

JWV/MSB: AUG. 2015
GJ#23

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ALABAMA
NORTHEASTERN DIVISION**

UNITED STATES OF AMERICA)
)
)
)
v.)
)
JUSTIN ADAM WATSON)

INDICTMENT

The Grand Jury charges:

COUNT ONE
Deprivation of Rights Under Color of Law
18 U.S.C. § 242

That on or about August 22, 2012, in Madison County, in the Northern District of Alabama, the defendant,

JUSTIN ADAM WATSON,

while acting under color of law, willfully deprived R.B., a person known to the Grand Jury, of the right, secured and protected by the Constitution and laws of the United States, to be free from unreasonable seizure of his person. Specifically, defendant **WATSON** willfully stopped and detained R.B. without probable cause and without reasonable suspicion.

All in violation of Title 18, United States Code, Section 242.

COUNT TWO
Deprivation of Rights Under Color of Law
18 U.S.C. § 242

That on or about August 22, 2012, in Madison County, in the Northern District of Alabama, the defendant,

JUSTIN ADAM WATSON,

while acting under color of law, physically assaulted R.B., a person known to the Grand Jury, and thereby willfully deprived R.B. of the right, secured and protected by the Constitution and laws of the United States, to be free from the use of unreasonable force. The offense resulted in bodily injury to R.B., and the offense included the use of a dangerous weapon.

All in violation of Title 18, United States Code, Section 242.

COUNT THREE
Obstruction of Justice – Corrupt Persuasion of a Witness
18 U.S.C. § 1512(b)(3)

That in or about August, 2012, in Madison County, in the Northern District of Alabama, the defendant

JUSTIN ADAM WATSON,

knowingly corruptly persuaded A.B., a person known to the grand jury, and

attempted to do so, with the intent to hinder, delay, and prevent the communication to a federal law enforcement officer and federal judge of information relating to the commission and possible commission of the federal offenses alleged in Counts One and Two. Specifically, defendant **WATSON** instructed A.B. to “Keep your mouth shut” about both a fight between defendant **WATSON** and R.B. and defendant **WATSON’S** subsequent efforts to identify and locate R.B.

All in violation of Title 18, United States Code, Section 1512(b)(3).

COUNT FOUR
Obstruction of Justice –Witness Intimidation
18 U.S.C. § 1512(b)(3)

That on or about August 22, 2012, and in or about 2014, in Madison County, in the Northern District of Alabama, the defendant,

JUSTIN ADAM WATSON,

knowingly intimidated, threatened, and corruptly persuaded J.C., a person known to the grand jury, and attempted to do so, with the intent to hinder, delay, and prevent the communication to a federal law enforcement officer and federal judge of information relating to the commission and possible commission of the federal offenses alleged in Counts One and Two. Specifically, after defendant **WATSON** admitted to J.C. on or about August 22, 2012, that he recognized R.B. from a

previous incident, he warned J.C. not to tell anyone.

In or about 2014, J.C. noticed that his head had been cut out of a photograph of deputies with the Madison County Sheriff's Office. When J.C. asked when **WATSON** had altered the photograph, defendant **WATSON** responded, "When did you go talk to the FBI?" In another incident in or about 2014, defendant **WATSON** pointed his unloaded handgun at the back of J.C.'s head and pulled the trigger.

All in violation of Title 18, United States Code, Section 1512(b)(3).

COUNT FIVE
Obstruction of Justice – Misleading Conduct
18 U.S.C. § 1512(b)(3)

That on or about December 12, 2012, in Madison County, in the Northern District of Alabama, the defendant,

JUSTIN ADAM WATSON,

knowingly engaged in misleading conduct toward another person with the intent to hinder, delay, and prevent the communication to a federal law enforcement officer and federal judge of information relating to the commission and possible commission of the federal offenses alleged in Counts One and Two. Specifically, defendant **WATSON** knowingly and intentionally misled a state court judge during a hearing in a criminal case when, under oath, he: (1) falsely denied seeing R.B.

prior to August 22, 2012; (2) falsely denied recognizing R.B. on August 22, 2012; (3) falsely denied seeing R.B. in any other incident prior to August 22, 2012; (4) falsely denied an encounter with R.B. prior to August 22, 2012; and (5) falsely denied an encounter with R.B. at Billy's Bar & Grill. In truth, as defendant **WATSON** then well knew, he had seen R.B. prior to the night of August 22, 2012. Further, defendant **WATSON** recognized, on or about August 22, 2012, that R.B. was the same man he previously had seen, encountered, and then fought with at Billy's Bar & Grill.

All in violation of Title 18, United States Code, Section 1512(b)(3).

A TRUE BILL

Foreperson of the Grand Jury

JOYCE WHITE VANCE
United States Attorney

/s/ electronic signature
MARY STUART BURRELL
Assistant United States Attorney
Northern District of Alabama
United States Attorney's Office

/s/ electronic signature
FORREST CHRISTIAN
Attorney Special Litigation Counsel
Civil Rights Division
United States Department of Justice