

FILED
IN CLERKS OFFICE

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS 2018 JAN 25 PM 2: 07

UNITED STATES OF AMERICA)	Criminal No. 18-cr-00003-MGM
)	
v.)	18 U.S.C. § 242 – Deprivation of Rights
)	Under Color of Law (Count One)
CHRISTOPHER M. ROEDER,)	
)	18 U.S.C. § 1519 – Falsification of
Defendant.)	a Document (Count Two)

INDICTMENT

The Grand Jury charges:

COUNT ONE: Title 18, United States Code, Section 242 – Deprivation of Rights Under Color of Law

On or about April 3, 2017, in Hampshire County, in the District of Massachusetts, and elsewhere,

CHRISTOPHER M. ROEDER,

defendant herein, then an officer with the Hadley Police Department, while acting under color of law, did willfully deprive a male arrestee of the right, secured and protected by the Constitution and laws of the United States, to be free from an unreasonable seizure, which includes the right to be free from the use of unreasonable force by a law enforcement officer; specifically, the defendant struck the arrestee in the face without legal justification while the arrestee was seated on a bench in the Hadley Police Department booking area. The offense resulted in bodily injury to the arrestee.

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

COUNT TWO: Title 18, United States Code, Section 1519 – Falsification of a Document

On or about April 3, 2017, in Hampshire County, in the District of Massachusetts, and elsewhere,

CHRISTOPHER M. ROEDER,

defendant herein, acting with the intent to impede, obstruct, and influence the investigation and proper administration of a matter within the jurisdiction of the Federal Bureau of Investigation (FBI), an agency of the United States, and acting in relation to and in contemplation of such matter, knowingly falsified and made a false entry in a record and document, namely, a police report. Specifically, Defendant ROEDER wrote a police report in which he described his interaction with the male arrestee in the police department booking area and falsely wrote that: (1) the arrestee made an obscene comment towards Defendant ROEDER after the arrestee had been instructed to turn his head to complete the booking photograph process; (2) after Defendant ROEDER instructed the arrestee to sit down, the arrestee sat down “slowly” and then, when Defendant ROEDER tried to handcuff the arrestee, the arrestee attempted to stand again; (3) Defendant ROEDER used his right hand to attempt to gain control of the arrestee’s left arm while ordering the arrestee to stop resisting; and (4) Defendant ROEDER had no alternative options to delivering an elbow strike directly to the bridge of the arrestee’s nose in order to gain the arrestee’s compliance. In fact, however, as Defendant ROEDER knew: (1) the arrestee did not make an obscene comment towards Defendant ROEDER after being instructed to turn his head to complete the booking photograph process; (2) the arrestee immediately sat down and did not attempt to stand after Defendant ROEDER’s instruction that the arrestee sit down; (3) Defendant ROEDER did not use his right hand to attempt to gain control of the arrestee’s left arm while ordering the arrestee to stop resisting; and (4) Defendant ROEDER did not need to strike the arrestee in the face with an

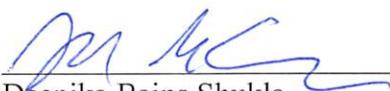
elbow.

All in violation of Title 18, United States Code, Section 1519.

A TRUE BILL



FOREPERSON OF THE GRAND JURY



Deepika Bains Shukla
Assistant U.S. Attorney

Timothy Visser
Trial Attorney, U.S. Department of Justice

DISTRICT OF MASSACHUSETTS:

Returned into the District Court by the Grand Jurors and filed on January 25, 2018.



DEPUTY CLERK OF THE COURT 12:15pm