

UNITED STATES DISTRICT COURT
MIDDLE DISTRICT OF GEORGIA
VALDOSTA DIVISION

UNITED STATES OF AMERICA	:	INDICTMENT	7:20-cr-54
	:		
v.	:	CRIMINAL NO.	
	:		
PATRICK SHARPE and	:	VIOLATIONS:	
JAMAL SCOTT,	:	18 U.S.C. § 2	
	:	18 U.S.C. § 241	
Defendants.	:	18 U.S.C. § 242	
	:	18 U.S.C. § 1001	

THE GRAND JURY CHARGES THAT:

General Allegations

At all times relevant to this Indictment:

1. The Valdosta State Prison (“VSP”) was a prison facility operated by the Georgia Department of Corrections (“GDOC”) and located in the city of Valdosta in Lowndes County, Georgia, in the Middle District of Georgia.
2. VSP housed incarcerated inmates in several separate buildings located on the grounds of the prison. It was possible to walk outside on the grounds of VSP to move from one building to another. The Segregation Unit was located in the “E” building at VSP. Correctional officers at VSP placed inmates in Segregation for various reasons, including for misbehavior. In the yard just outside of E building were cages in which correctional officers could confine inmates temporarily. Between the E building wall and the cages was a narrow, alleyway-like space that was not equipped with, or within view of, video security cameras.
3. A “Code 3” was a radio call out used by correctional officers at VSP to indicate that a correctional officer was in trouble and required immediate assistance.

4. **PATRICK SHARPE** was employed by the GDOC and worked as a correctional officer at VSP. In approximately October 2018, **PATRICK SHARPE** was promoted to the rank of Sergeant. As a Sergeant, his job responsibilities included supervising other correctional officers.
5. **JAMAL SCOTT** and **BRIAN FORD** were employed by GDOC as correctional officers at VSP.
6. **F.G.** was an inmate incarcerated at VSP on or about December 29 to 30, 2018.
7. **M.B.** was an inmate incarcerated at VSP on or about September 24, 2018.
8. Each of these allegations is hereby re-alleged, referenced, and incorporated into each count of this Indictment.

COUNT ONE

(Conspiracy Against Rights 18 U.S.C. § 241)

From on or about December 29, 2018, and continuing through on or about December 30, 2018, in Lowndes County, in the Middle District of Georgia, the defendants

PATRICK SHARPE and JAMAL SCOTT,

willfully combined, conspired, and agreed with each other and with Brian Ford, not charged herein, and another supervisory officer known to the grand jury, to injure, oppress, threaten, and intimidate inmate F.G. in the free exercise and enjoyment of rights and privileges secured to him by the Constitution and laws of the United States, namely the right to be free from cruel and unusual punishment by a person acting under color of law, which includes the right to be free from the use of excessive force by a correctional officer.

Purpose of the Conspiracy

The purpose of the conspiracy was to physically assault and intimidate inmate F.G. as punishment for F.G.'s earlier interaction with a female correctional officer that the Defendants believed was inappropriate.

Overt Acts

In furtherance of the conspiracy, and to accomplish its objectives, one or more members of the conspiracy committed the following overt acts, among others, in the Middle District of Georgia:

1. On or about December 29-30, 2018, **PATRICK SHARPE, JAMAL SCOTT**, Brian Ford, and other correctional officers escorted inmate F.G., who was handcuffed, toward Segregation in E building.
2. On or about December 29-30, 2018, during the escort of F.G., **PATRICK SHARPE** made statements instructing another correctional officer or officers to use physical force on F.G.
3. On or about December 29-30, 2018, **PATRICK SHARPE, JAMAL SCOTT**, Brian Ford, and other correctional officers took inmate F.G. to the alleyway between E building and the cages, out of view of any security cameras.
4. On or about December 29-30, 2018, **PATRICK SHARPE** instructed the correctional officers to begin the assault of inmate F.G.
5. On or about December 29-30, 2018, **PATRICK SHARPE** instructed the correctional officers to avoid striking inmate F.G. in his face.
6. On or about December 29-30, 2018, after receiving **PATRICK SHARPE's** instruction to begin the assault, **JAMAL SCOTT** and Brian Ford each struck inmate F.G. multiple times with their hands while F.G. was handcuffed, causing bodily injury.

7. On or about December 29-30, 2018, **PATRICK SHARPE** stood by and watched the correctional officers assault inmate F.G., despite having the opportunity to intervene.

All in violation of Title 18, United States Code, Section 241.

COUNT TWO

(Deprivation of Rights Under Color of Law: 18 U.S.C. § 242; 18 U.S.C. §2)

On or about December 29, 2018, and continuing through on or about December 30, 2018, in Lowndes County, in the Middle District of Georgia, the defendants

PATRICK SHARPE and JAMAL SCOTT,

while acting under color of law and while aiding and abetting one another and Brian Ford, not charged herein, willfully deprived inmate F.G. of the right, secured and protected by the Constitution and laws of the United States, to be free from cruel and unusual punishment, which includes the right to be free from the use of excessive force by a correctional officer. Specifically, Defendant **SHARPE** instructed Defendants **SCOTT** and Ford to assault inmate F.G., and Defendants **SCOTT** and Ford assaulted F.G. by striking F.G. in the body while F.G. was handcuffed and compliant. This offense resulted in bodily injury to inmate F.G.

In violation of Title 18, United States Code, Sections 242 and 2.

COUNT THREE

(Deprivation of Rights Under Color of Law: 18 U.S.C. § 242)

On or about September 24, 2018, in Lowndes County, in the Middle District of Georgia, the defendant,

PATRICK SHARPE,

while acting under color of law, willfully deprived inmate M.B. of the right, secured and protected by the Constitution and laws of the United States, to be free from cruel and unusual punishment, which includes the right to be free from the use of excessive force by a correctional officer.

Specifically, Defendant **SHARPE** assaulted inmate M.B. by striking M.B. in the face and head with handcuffs wrapped around his fist. This assault resulted in bodily injury to M.B. and included the use, attempted use, and threatened use of a dangerous weapon (handcuffs).

In violation of Title 18, United States Code, Section 242.

COUNT FOUR

(False Statements to a Federal Agency: 18 U.S.C. § 1001)

On or about July 30, 2020, in the Middle District of Georgia, the defendant,

PATRICK SHARPE,

did willfully and knowingly make a materially false, fictitious, and fraudulent statement and representation as to a material fact in a matter within the jurisdiction of the Federal Bureau of Investigation, an agency of the executive branch of the Government of the United States. Specifically, Defendant **SHARPE** told Special Agents with the FBI (1) that Defendant **SHARPE** never put handcuffs over his fist and never hit inmate M.B. in the face and head; and (2) that M.B. sustained injuries from landing on his head when Defendant **SHARPE**, together with correctional officer M.M., took inmate M.B. to the ground because M.B. was irate and noncompliant. Those statements and representations were false because, as Defendant **SHARPE** then and there knew, Defendant **SHARPE** had placed handcuffs over his fist and hit inmate M.B. in the face and head with the handcuffed-wrapped fist; inmate M.B. sustained injuries as a result of Defendant **SHARPE**'s strikes, not from being taken to the ground; and inmate M.B. was compliant at the time Defendant **SHARPE** struck M.B. in the face and head.

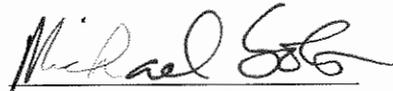
In violation of Title 18, United States Code, Section 1001.

A TRUE BILL.

s/ Foreperson of the Grand Jury
FOREPERSON OF THE GRAND JURY

PRESENTED BY:

CHARLES E. PEELER
UNITED STATES ATTORNEY

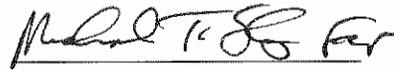


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Filed in open court this 10 day of Dec, A.D. 2020



Deputy Clerk