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FILED IN THE
U.S. DISTRICT COURT
EASTERN DISTRICT OF WASHINGTON

JUN 19 2009

JAMES R. LARSEN, CLERK
DEPUTY
SPOKANE, WASHINGTON

11 UNITED STATES DISTRICT COURT
12 EASTERN DISTRICT OF WASHINGTON

13 **CR-09-0088-FVS**

INDICTMENT

14 UNITED STATES OF AMERICA,

15 Plaintiff,

16 vs.

17 KARL F. THOMPSON, JR.,

18 Defendant.

Vio: 18 U.S.C. § 242
Deprivation of Rights
Under Color of Law
(Count 1)

18 U.S.C. § 1519
Falsification of Records in
a Federal Investigation
(Count 2)

21 The Grand Jury Charges:

23 **COUNT ONE**

24 On or about March 18, 2006, in the Eastern District of Washington, the
25 Defendant, **KARL F. THOMPSON, JR.**, then a police officer with the Spokane
26 Police Department, while acting under color of law, struck and repeatedly struck Otto
27 Zehm with a baton and tasered him, resulting in bodily injury to Otto Zehm, and
28 thereby willfully deprived Otto Zehm of a right preserved and protected by the

1 Constitution of the United States, namely, the right to be free from the unreasonable
2 use of force by one acting under color of law, all in violation of Title 18, United
3 States Code, Section 242.

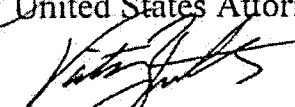
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5 COUNT TWO

6 Between on or about March 22, 2006, and on or about March 27, 2006, in the
7 Eastern District of Washington, the Defendant, **KARL F. THOMPSON, JR.**, then
8 a police officer with the Spokane Police Department, knowingly made a false entry
9 in a record and document, to wit: by making a false statement in an interview
10 recorded on March 22, 2006, a transcription of which was reviewed and signed by
11 **KARL F. THOMPSON, JR.** on March 27, 2006, with the intent to impede, obstruct
12 and influence, the investigation of a matter within the jurisdiction of a department and
13 agency of the United States, that is, the Federal Bureau of Investigation, and in
14 relation to and contemplation of such investigation, involving the violation of
15 constitutional rights described in Count One of this indictment, all in violation of
16 Title 18, United States Code, Section 1519.

17 DATED this 19 day of June, 2009.

18 A TRUE BILL

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21 
22 James A. McDevitt
23 United States Attorney

24 
25 Victor Boutros, Trial Attorney
26 United States Department of Justice
27 Civil Rights Division

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