

FILED IN THE  
U.S. DISTRICT COURT  
EASTERN DISTRICT OF WASHINGTON  
  
JUN 19 2009  
  
JAMES R. LARSEN, CLERK  
DEPUTY  
SPOKANE, WASHINGTON

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11 UNITED STATES DISTRICT COURT  
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.


4  
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  
19  
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22   
James A. McDevitt  
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25 United States Department of Justice  
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