

UNITED STATES DISTRICT COURT
DISTRICT OF CONNECTICUT

2012 OCT 14 P 12:18

Grand Jury H-11-1

UNITED STATES OF AMERICA : Criminal No. 3:12CR _____
:
v. :
: VIOLATIONS:
: 18 U.S.C. § 242 [Deprivation of Rights]
EVAN COSSETTE : 18 U.S.C. § 1519 [Obstruction of Justice]

INDICTMENT

The Grand Jury charges:

BACKGROUND

At all times relevant to this indictment:

1. The defendant EVAN COSSETTE ("COSSETTE") was an officer with the Meriden Police Department. COSSETTE has been a police officer since he was certified in March 2009.
2. On May 1, 2010, COSSETTE responded with another officer to a reported hit-and-run incident. Upon identifying P.T., an individual whose identity is known to the Grand Jury, as the driver likely involved in the hit-and-run incident, the officers attempted to arrest P.T. Although P.T., who was intoxicated, initially refused to comply with commands from COSSETTE and another officer, P.T. was eventually handcuffed and placed under arrest.
3. COSSETTE transported P.T. to the Meriden Police Department without assistance, while two other Meriden Police officers remained at the scene of the incident.
4. Upon arriving at the Meriden Police Department, COSSETTE escorted a compliant and handcuffed P.T. from the squad car to the holding cell.

5. Once inside the holding cell, COSSETTE firmly shoved the compliant and handcuffed P.T., causing P.T. to fall backwards and strike his head on a cement cell bench. P.T. suffered a deep cut and trauma to his head that required medical attention.

6. P.T. lost consciousness, but regained it prior to the arrival of paramedics.

7. Upon arriving at the Meriden Police Department and in an effort to gain important patient medical information, a first responder, whose identity is known to the Grand Jury, interviewed COSSETTE, who falsely told the first responder that P.T. had not lost consciousness.

8. Ambulance and fire department personnel transported P.T. to Midstate Medical Center for further treatment.

9. On May 2, 2010, COSSETTE prepared and submitted an official police report detailing the investigation, apprehension, and arrest of P.T. as well as P.T.'s subsequent injuries and ultimate transportation to Midstate Medical Center.

10. In his arrest report, COSSETTE falsely claimed that the following events transpired at the Meriden Police Department: "[P.T.] remained uncooperative and immediately spun around when I placed him in the cell. [P.T.] invaded my personal space and I became fearful that he would again attempt to engage me in a physical altercation and possibly head butt me. I ordered [P.T.] to get back three or four times, which was witnessed by Ofc. [G]. [P.T.] ignored my verbal commands and advanced on me so I gave him a firm push back."

COUNT ONE

(Deprivation of Rights: Unreasonable Force)

11. The allegations in paragraphs 1 through 10 are realleged and incorporated by reference into Count One.

12. On or about May 1, 2010, in the District of Connecticut, COSSETTE, while acting under color of law, did assault P.T., which resulted in P.T.'s bodily injury, willfully depriving P.T. of the right, secured and protected by the Constitution and laws of the United States to be free from the use of unreasonable force by a law enforcement officer, that is, COSSETTE shoved P.T., who was handcuffed, thereby causing P.T. to fall backwards and strike his head on a cement cell bench in the Meriden Police Department holding cell, which resulted in a deep cut and trauma to P.T.'s head.

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

COUNT TWO
(Obstruction: False Report)

13. The allegations in paragraphs 1 through 10 are realleged and incorporated by reference into Count Two.

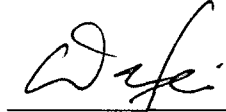
14. On or about May 1, 2010, in the District of Connecticut, COSSETTE, in relation to and in contemplation of a matter within the jurisdiction of the Federal Bureau of Investigation, an agency of the United States, did knowingly falsify a document and make material false entries in a document with the intent to impede, obstruct, and influence the investigation of that matter, that is, COSSETTE made false and misleading statements, as well as material omissions, in his report relating to the arrest and processing of P.T. in order to cover up and create a false justification for his assault upon P.T.

In violation of Title 18, United States Code, Section 1519.

A TRUE BILL

15/
FOREPERSON

UNITED STATES OF AMERICA



DAVID B. FEIN
UNITED STATES ATTORNEY



PAUL H. McCONNELL
ASSISTANT UNITED STATES ATTORNEY