

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF MISSOURI  
EASTERN DIVISION

**FILED**

AUG - 5 2020

U. S. DISTRICT COURT  
EASTERN DISTRICT OF MO  
ST. LOUIS

UNITED STATES OF AMERICA,

Plaintiff,

v.

ELLIS CARROLL BROWN III,

Defendant.

**4:20CR380 RWS/SPM**

**INDICTMENT**

**General Allegations**

The Grand Jury charges that:

At all times relevant to this Indictment:

1. The St. Ann Police Department ("SAPD") was a law enforcement agency in the Eastern District of Missouri;
2. Among other functions, the SAPD was responsible for investigating crimes occurring in St. Ann, Missouri;
3. Members of the SAPD also assisted other municipal police departments located in and around St. Louis County on an "as needed" basis;
4. Defendant ELLIS BROWN was employed by the SAPD as a police officer;
5. Defendant ELLIS BROWN was sworn to uphold the United States Constitution, as well as the laws of the State of Missouri.

**COUNT ONE**  
**[18 U.S.C. §242]**

6. Paragraphs 1-5 of the General Allegations are incorporated by reference in this count.
7. On or about April 9, 2019, within the Eastern District of Missouri, the defendant,

**ELLIS CARROLL BROWN III,**

while acting under color of law, willfully deprived S.K. of the right to be free from unreasonable seizure, a right secured and protected by the Constitution and laws of the United States, which right includes the right to be free from the use of unreasonable force. In so doing, the defendant repeatedly kicked S.K. while S.K. was compliant and not posing a physical threat to anyone. This offense resulted in bodily injury to S.K. and included the use of a dangerous weapon, to wit: shod feet.

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

A TRUE BILL.

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FOREPERSON

JEFFREY B. JENSEN  
United States Attorney

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