

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF LOUISIANA

FELONY

INDICTMENT FOR DEPRIVATION OF RIGHTS UNDER COLOR
OF LAW, OBSTRUCTION OF A FEDERAL INVESTIGATION,
OBSTRUCTION OF JUSTICE AND FALSE STATEMENTS

UNITED STATES OF AMERICA

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CRIMINAL DOCKET NO.

v.

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SECTION:

MELVIN WILLIAMS and
MATTHEW DEAN MOORE

*

VIOLATION: 18 U.S.C. § 242
18 U.S.C. § 1001
18 U.S.C. § 1519

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The Grand Jury charges that:

INTRODUCTION

At all times relevant to this Indictment:

1. Defendants **MELVIN WILLIAMS** and **MATTHEW DEAN MOORE** were officers with the New Orleans Police Department (NOPD).
2. On July 30, 2005, defendants **WILLIAMS** and **MOORE** encountered Raymond Robair while they were on patrol on or around Dumaine Street in New Orleans, Louisiana.
3. Defendants **WILLIAMS** and **MOORE** took Robair into police custody on Dumaine Street.

4. Defendants **WILLIAMS** and **MOORE** transported Robair to the Medical Center of Louisiana at New Orleans (Charity Hospital), where they failed to tell medical personnel that Robair had been struck by defendant **WILLIAMS**.

5. Robair was pronounced dead at Charity Hospital on July 30, 2005.

6. An autopsy conducted after the defendants submitted their incident report showed that Raymond Robair had suffered fractured ribs and a ruptured spleen.

7. In or about August 2005, NOPD began investigating Robair's death, with assistance from the Federal Bureau of Investigation (FBI).

8. Each of these allegations is hereby referenced and incorporated into each of and every count of the indictment.

COUNT 1

(Deprivation of Rights Under Color of Law)

On or about July 30, 2005, in the Eastern District of Louisiana, defendant, **MELVIN WILLIAMS**, while acting under color of law, kicked Raymond Robair and struck him with a police baton, willfully depriving him 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. The offense involved the use of a dangerous weapon and resulted in bodily injury to, and the death of, Raymond Robair; all in violation of Title 18, United States Code, Section 242.

COUNT 2

(Obstruction of a Federal Investigation)

On or about July 30, 2005, in the Eastern District of Louisiana, defendants, **MELVIN WILLIAMS** and **MATTHEW DEAN MOORE**, in relation to and in contemplation of a matter within the jurisdiction of the Federal Bureau of Investigation (FBI), an agency of the United States, aided and abetted one another in knowingly making a false entry in a record and document with intent to impede, obstruct, and influence the investigation and proper administration of the matter within federal jurisdiction. That is, defendants **WILLIAMS** and **MOORE** submitted an NOPD incident report falsely describing a "medical incident" involving an unknown subject on Dumaine Street on July 30, 2005. Specifically, defendants **WILLIAMS** and **MOORE** included in their report a false description of the circumstances surrounding the injuries that Raymond Robair suffered while in the custody of the defendants; all in violation of Title 18, United States Code, Sections 1519 and 2.

COUNT 3

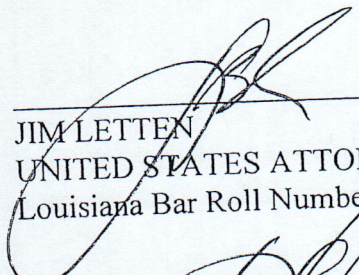
(False Statement)

On or about March 11, 2010, and again on or about March 16, 2010, in the Eastern District of Louisiana, defendant, **MATTHEW DEAN MOORE**, knowingly and willfully made materially false statements and representations in a matter within the jurisdiction of the FBI, an agency of the executive branch of the United States, when he told FBI agents investigating the death of Raymond Robair that defendant **MELVIN WILLIAMS** never hit or kicked Robair. In truth and in fact, as

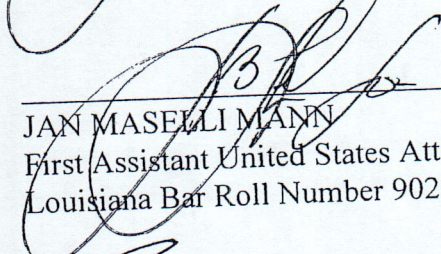
defendant MOORE then well knew, defendant WILLIAMS kicked Robair and hit him with a baton on or about July 30, 2005; all in violation of Title 18, United States Code, Section 1001.

A TRUE BILL:

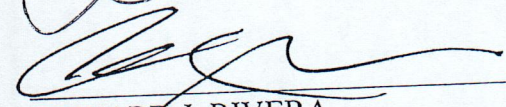
FOREPERSON



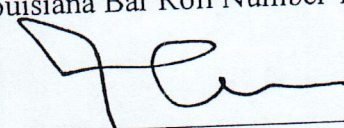
JIM LETTEN
UNITED STATES ATTORNEY
Louisiana Bar Roll Number 8517



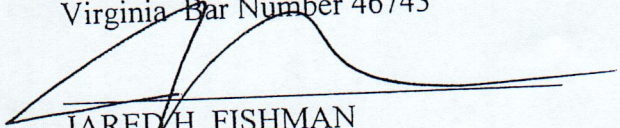
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New Orleans, Louisiana
July 29, 2010