

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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UNITED STATES OF AMERICA :

- v. - :

SEALED INDICTMENT

TAJ EVERLY, :

22 Cr. 580)

Defendant. :

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COUNT ONE

(Falsification of Records)

The Grand Jury charges:

1. At all relevant times, TAJ EVERLY, the defendant, was a correction officer employed by the New York State Department of Corrections and Community Supervision ("DOCCS") at Green Haven Correctional Facility ("Green Haven"), a state prison located in Stormville, New York.

2. On or about May 28, 2020, TAJ EVERLY, the defendant, assaulted an inmate ("Inmate-1") at Green Haven. Specifically, EVERLY was stationed near the H Block end gate at Green Haven. As Inmate-1 approached the end gate, EVERLY approached and punched Inmate-1 without provocation, causing both EVERLY and Inmate-1 to fall to the ground.

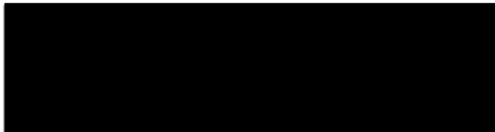
3. After the assault, TAJ EVERLY, the defendant, attempted to conceal the circumstances of the assault so that it would appear that the use of force against Inmate-1 was warranted.

In particular, EVERLY falsely reported on a DOCCS "Use of Force" form that Inmate-1 threw an "unprovoked punch, hitting [EVERLY] on the left shoulder/neck area", and that, in response, EVERLY "instinctively [] threw one right hand punch hitting [Inmate-1] in the face" and "then immediately applied a body hold and took [Inmate-1] to the ground."

Statutory Allegation

4. On or about May 28, 2020, in the Southern District of New York, TAJ EVERLY, the defendant, knowingly altered, destroyed, mutilated, concealed, covered up, falsified, and made a false entry in a record, document, and tangible object with the intent to impede, obstruct, and influence the investigation and proper administration of a matter within the jurisdiction of a department and agency of the United States, to wit, EVERLY falsified a use of force report with the intent to impede the investigation of the assault of Inmate-1, an inmate at Green Haven Correctional Facility, which investigation fell within the jurisdiction of the United States Attorney's Office for the Southern District of New York and the Federal Bureau of Investigation.

(Title 18, United States Code, Section 1519.)



Damian Williams
DAMIAN WILLIAMS
United States Attorney

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TAJ EVERLY,

Defendant.

SEALED INDICTMENT

22 Cr. 55()

(18 U.S.C. § 1519.)

DAMIAN WILLIAMS

United States Attorney.

A TRUE BILL

