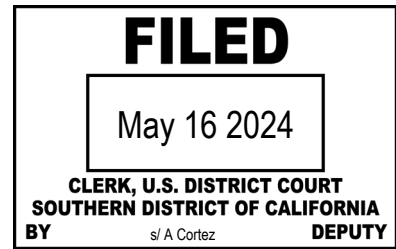


ORDERED UNSEALED on 05/17/2024 s/ melindajw



~~SEALED~~

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF CALIFORNIA

October 2022 Grand Jury

UNITED STATES OF AMERICA,

Plaintiff,

v.

AARON RICHARD RUSSELL,

Defendant.

Case No. '24 CR1015W

I N D I C T M E N T

Title 18, U.S.C., Sec. 242 -
Deprivation of Rights Under Color
of Law; Title 18, U.S.C.,
Sec. 924(c)(1)(A)(i) and (iii) -
Use and Discharge of a Firearm
During and in Relation to a Crime
of Violence

The grand jury charges:

At all relevant times:

1. Defendant AARON RICHARD RUSSELL was a deputy at the San Diego County Sheriff's Department
2. N.B. was a 36-year-old man living in Southern California.
3. On or about the afternoon of May 1, 2020, California Parks Police Officers arrested N.B. and transported him to the San Diego Central Jail located at the intersection of Front Street and B Street in downtown San Diego, California.
4. As officers arrived at the Central Jail with N.B. in the backseat of a Parks Police vehicle, N.B. escaped from the vehicle and ran north on Front Street away from officers.

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1 5. A Parks Police officer chased behind N.B., who was unarmed.

2 6. As N.B. ran away and without first issuing N.B. a warning to
3 stop, defendant AARON RICHARD RUSSELL fired two shots at N.B. using his
4 duty weapon, then paused briefly and fired three more shots at N.B. from
5 behind.

6 7. One or more of the shots hit N.B. in the back and caused him
7 to fall to the ground.

8 8. After defendant AARON RICHARD RUSSELL fired five shots, he
9 holstered his weapon, put his lunch container on the ground, and put on
10 a face mask before approaching N.B. as he lay on the ground.

11 9. Defendant AARON RICHARD RUSSELL did not issue any warnings to
12 the other officers on scene, either before or after he fired.

13 10. During the foot pursuit of N.B., the two Parks Police officers
14 who brought N.B. to the jail and a second sheriff's deputy who was
15 standing close to defendant AARON RICHARD RUSSELL were all carrying
16 weapons on their belts, but they did not draw their weapons or fire any
17 shots during the incident.

18 11. The shots fired by defendant AARON RICHARD RUSSELL resulted
19 in N.B.'s death.

20 Paragraphs 1 through 11 are hereby incorporated by reference into
21 the charge as set forth below.

22 Count 1

23 On or about May 1, 2020, within the Southern District of California,
24 defendant AARON RICHARD RUSSELL, while acting under color of law as a
25 deputy with the San Diego County Sheriff's Department, willfully
26 deprived N.B. of the right, secured and protected by the Constitution
27 and the laws of the United States, to be free from an unreasonable
28 seizure, which includes the right to be free from a law enforcement

1 officer using unreasonable force, by shooting N.B. multiple times when
2 there was no lawful justification to use deadly force. The offense
3 included the use of a dangerous weapon and resulted in N.B.'s death; all
4 in violation of Title 18, United States Code, Section 242.

5 Count 2


6 On or about May 1, 2020, in the Southern District of California,
7 defendant AARON RICHARD RUSSELL, during and in relation to a crime of
8 violence for which the defendant may be prosecuted in a court of the
9 United States, namely, the offense charged in Count One of this
10 Indictment, did knowingly use and discharge a firearm; in violation of
11 Title 18, United States Code, Section 924(c)(1)(A)(i) and (iii).

12 DATED: May 16, 2024.

13 A TRUE BILL:

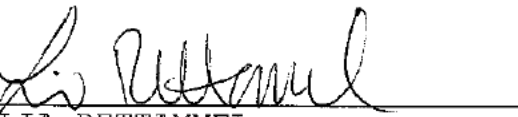


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26 By: 
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