

**FILED**  
JAMES J. VILT, JR. - CLERK  
AUG - 3 2022  
U.S. DISTRICT COURT  
WEST'N. DIST. KENTUCKY

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF KENTUCKY  
AT LOUISVILLE

UNITED STATES OF AMERICA )  
 )  
 v. )  
 )  
 )  
 )  
 BRETT HANKISON, )  
 )  
 Defendant. )

No. 3:22-CR-84-RGJ  
18 U.S.C. § 242

**INDICTMENT**

THE GRAND JURY CHARGES:

Introduction

At times material to this Indictment:

1. Breonna Taylor was a 26-year-old woman from Louisville, Kentucky, who as of March 12-13, 2020, had lived for several years in a two-bedroom apartment at 3003 Springfield Drive, Apartment 4.

2. K.W. was a 28-year-old man from Louisville, Kentucky, who had a personal relationship with Taylor. On or around March 12-13, 2020, K.W. was staying with Taylor at 3003 Springfield Drive, Apartment 4.

3. C.N., then a 24-year-old woman; Z.F., then a three-year-old boy; and C.E., then a 28-year-old man, lived next door to Taylor, at 3003 Springfield Drive, Apartment 3.

4. **BRETT HANKISON** was a Louisville Metro Police Department (LMPD) detective who had worked at LMPD for approximately 17 years.

5. On March 12, 2020, LMPD's Place-Based Investigations Unit (PBI) obtained warrants to search five properties as part of a narcotics investigation. These properties included Taylor's home at 3003 Springfield Drive, Apartment 4.

6. Seven LMPD officers executed the search warrant at Taylor's home at approximately 12:45 a.m. on March 13, 2020.

7. When officers broke down the door to Apartment 4, K.W. immediately fired one shot with a handgun that he lawfully possessed. Two LMPD officers in the doorway immediately returned fire into Taylor's apartment with their service weapons. **BRETT HANKISON** then moved from the doorway to the side of the apartment and fired ten more shots through a window and a sliding glass door, both of which were covered with blinds and curtains.

Paragraphs 1 through 7 are hereby incorporated by reference into the counts set forth below.

THE GRAND JURY FURTHER CHARGES:

COUNT ONE  
*(Deprivation of Rights Under Color of Law)*

On or about March 13, 2020, in the Western District of Kentucky, **BRETT HANKISON**, while acting under color of law, willfully deprived Breonna Taylor and K.W. of the right, secured and protected by the Constitution and laws of the United States, to be free from unreasonable seizures. Specifically, during a seizure of Breonna Taylor and K.W. by officers executing a search warrant, and after there was no longer a lawful objective justifying the use of deadly force, **BRETT HANKISON** fired five shots through a bedroom window that was covered with blinds and a blackout curtain. The offense involved the use of a dangerous weapon and an attempt to kill.

All in violation of Title 18, United States Code, Section 242.

THE GRAND JURY FURTHER CHARGES:

COUNT TWO  
*(Deprivation of Rights Under Color of Law)*

On or about March 13, 2020, in the Western District of Kentucky, **BRETT HANKISON**, while acting under color of law, willfully deprived C.N., Z.F., and C.E. of the right, secured and protected by the Constitution and laws of the United States, to be free from the deprivation of liberty without due process of law, which includes the right to be free from an officer's use of unjustified force that shocks the conscience. Specifically, after there was no longer a lawful objective justifying the use of deadly force, **BRETT HANKISON** fired five bullets into the living room of Apartment 4 through a sliding glass door that was covered with blinds and a curtain. Multiple bullets traveled through the wall of Apartment 4 and into Apartment 3, endangering C.N., Z.F., and C.E. The offense involved the use of a dangerous weapon and an attempt to kill.

All in violation of Title 18, United States Code, Section 242.

A TRUE BILL:

**Redacted**

KRISTEN CLARKE  
ASSISTANT ATTORNEY GENERAL  
CIVIL RIGHTS DIVISION

MICHAEL J. SONGER  
ANNA GOTFRYD  
TRIAL ATTORNEYS  
CIVIL RIGHTS DIVISION

ZACHARY DEMBO  
ASSISTANT U.S. ATTORNEY  
EASTERN DISTRICT OF KENTUCKY

ATTORNEYS FOR THE UNITED STATES, ACTING UNDER  
AUTHORITY CONFERRED BY 28 U.S.C. § 515