

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF KENTUCKY
AT LOUISVILLE

FILED
JAMES J. VILT JR.,
CLERK
5/18/2022
U.S. DISTRICT COURT
WESTERN DISTRICT OF KENTUCKY

UNITED STATES OF AMERICA

INFORMATION

v.

NO. 3:22-cr-47-BJB
18 U.S.C. § 241

BRYAN ANDREW WILSON
CURT FLYNN

The United States Attorney Charges:

At times relevant to this Information:

1. The Louisville Metro Police Department (“LMPD”) was an agency of the Commonwealth of Kentucky which had the primary responsibility of providing police services within geographical boundaries of Jefferson County, Kentucky. The LMPD Ninth Mobile Division was a specialized division within the LMPD with a primary mission of addressing violent crime in Louisville Metro by focusing on hot spots of violent criminal activity, identifying and arresting the worst offenders and addressing gang activity that the Ninth Mobile Division encountered.

2. Detective **BRYAN ANDREW WILSON** joined the LMPD in August 2011 and became a Detective in the Ninth Mobile Division in July 2016.

3. Detective **CURT FLYNN** joined the LMPD in November 2010 and became a Detective in the Ninth Mobile Division in October 2017.

4. The John Doe and Jane Doe victims referenced below are individuals present in the geographic area in which the Ninth Mobile Division operated.

COUNT 1
(Conspiracy Against Rights)

Beginning no later than August 2018 and continuing through in or about September 2019, in the Western District of Kentucky, Jefferson County, Kentucky, the defendants, **BRYAN ANDREW WILSON** and **CURT FLYNN**, willfully combined, conspired, and agreed with one another and with other individuals known and unknown to the United States Attorney, to injure, oppress, threaten, and intimidate John Does and Jane Does in the free exercise and enjoyment 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 arbitrary force used by a police officer that serves no legitimate governmental purpose.

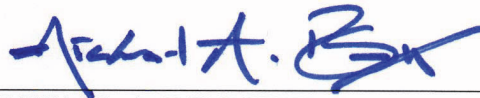
Manner and Means of the Conspiracy

It was part of the manner and means of the conspiracy that the defendants, **BRYAN ANDREW WILSON** and **CURT FLYNN**, along with others known and unknown, while on duty with the Ninth Mobile Division, dressed in clothing identifying them as LMPD officers, and driving unmarked LMPD vehicles, assaulted and attempted to assault civilian John Does and Jane Does in the following manner:

- a. LMPD Detectives in the Ninth Mobile Unit usually rode two or three to a car, and frequently conducted their patrols during the evening and nighttime hours;
- b. **BRYAN ANDREW WILSON**, **CURT FLYNN**, and others known and unknown would obtain large beverages from local gas stations and other establishments and bring those beverages into their cars;
- c. **BRYAN ANDREW WILSON**, **CURT FLYNN**, and others known and unknown would identify a civilian John Doe or Jane Doe walking in the geographic area of the Ninth Mobile Division on the sidewalk or near the street;

- d. At various points **BRYAN ANDREW WILSON** and/or **CURT FLYNN** would announce on the police radio words to the effect of, “someone was thirsty” or “thirsty fam;”
- e. **BRYAN ANDREW WILSON** and/or **CURT FLYNN** would instruct the driver of the unmarked LMPD vehicle in which they were riding to slow down and drive closer to the sidewalk or the edge of the street and then **BRYAN ANDREW WILSON** or **CURT FLYNN** would throw the beverage, including the container and/or its contents, at the John Doe or Jane Doe;
- f. On many occasions the John Doe or Jane Doe was hit with the beverage and, on at least one occasion, a civilian, John Doe, was knocked down to the ground from the impact of being hit with the beverage and container;
- g. The driver of the unmarked LMPD vehicle—**BRYAN ANDREW WILSON**, **CURT FLYNN**, and others known and unknown—would then accelerate the car and flee the scene;
- h. **BRYAN ANDREW WILSON** and **CURT FLYNN** would record or instruct others to record their actions on video using their cell phones. These recordings were sometimes made from inside the car from which the beverage was thrown, and sometimes from an LMPD car following closely behind the car from which the beverage was thrown; and
- i. **BRYAN ANDREW WILSON** would subsequently display these videos to other members of the Ninth Mobile Unit.

In violation of Title 18, United States Code, Section 241.



MICHAEL A. BENNETT
UNITED STATES ATTORNEY

MAB:DRW:SMZ

UNITED STATES OF AMERICA v. **BRYAN ANDREW WILSON** and **CURT FLYNN**

PENALTIES

Count 1: NM 10 yrs./\$250,000/both/NM 3 yrs. Supervised Release

NOTICE

ANY PERSON CONVICTED OF AN OFFENSE AGAINST THE UNITED STATES SHALL BE SUBJECT TO SPECIAL ASSESSMENTS, FINES, RESTITUTION & COSTS.

SPECIAL ASSESSMENTS

18 U.S.C. § 3013 requires that a special assessment shall be imposed for each count of a conviction of offenses committed after November 11, 1984, as follows:

Misdemeanor:	\$ 25 per count/individual	Felony:	\$100 per count/individual
	\$125 per count/other		\$400 per count/other

FINES

In addition to any of the above assessments, you may also be sentenced to pay a fine. Such fine is due immediately unless the court issues an order requiring payment by a date certain or sets out an installment schedule. You shall provide the United States Attorney's Office with a current mailing address for the entire period that any part of the fine remains unpaid, or you may be held in contempt of court. 18 U.S.C. § 3571, 3572, 3611, 3612

Failure to pay fine as ordered may subject you to the following:

1. **INTEREST** and **PENALTIES** as applicable by law according to last date of offense.

For offenses occurring after December 12, 1987:

No **INTEREST** will accrue on fines under \$2,500.00.

INTEREST will accrue according to the Federal Civil Post-Judgment Interest Rate in effect at the time of sentencing. This rate changes monthly. Interest accrues from the first business day following the two week period after the date a fine is imposed.

PENALTIES of:

10% of fine balance if payment more than 30 days late.

15% of fine balance if payment more than 90 days late.

2. Recordation of a **LIEN** shall have the same force and effect as a tax lien.
3. Continuous **GARNISHMENT** may apply until your fine is paid.

18 U.S.C. §§ 3612, 3613

If you **WILLFULLY** refuse to pay your fine, you shall be subject to an **ADDITIONAL FINE** of not more than the greater of \$10,000 or twice the unpaid balance of the fine; or **IMPRISONMENT** for not more than 1 year or both. 18 U.S.C. § 3615

RESTITUTION

If you are convicted of an offense under Title 18, U.S.C., or under certain air piracy offenses, you may also be ordered to make restitution to any victim of the offense, in addition to, or in lieu of any other penalty authorized by law. 18 U.S.C. § 3663

APPEAL

If you appeal your conviction and the sentence to pay your fine is stayed pending appeal, the court shall require:

1. That you deposit the entire fine amount (or the amount due under an installment schedule during the time of your appeal) in an escrow account with the U.S. District Court Clerk, or
2. Give bond for payment thereof.

18 U.S.C. § 3572(g)

PAYMENTS

If you are ordered to make payments to the U.S. District Court Clerk's Office, certified checks or money orders should be made payable to the Clerk, U.S. District Court and delivered to the appropriate division office listed below:

LOUISVILLE: Clerk, U.S. District Court
106 Gene Snyder U.S. Courthouse
601 West Broadway
Louisville, KY 40202
502/625-3500

BOWLING GREEN: Clerk, U.S. District Court
120 Federal Building
241 East Main Street
Bowling Green, KY 42101
270/393-2500

OWENSBORO: Clerk, U.S. District Court
126 Federal Building
423 Frederica
Owensboro, KY 42301
270/689-4400

PADUCAH: Clerk, U.S. District Court
127 Federal Building
501 Broadway
Paducah, KY 42001
270/415-6400

If the court finds that you have the present ability to pay, an order may direct imprisonment until payment is made.