



**IN THE CIRCUIT COURT OF JACKSON COUNTY, MISSOURI
AT KANSAS CITY**

POLICE NO. :	KC19087616
PROSECUTOR NO. :	095459110 (Brummett)
PROSECUTOR NO. :	095459111 (Prichard)
OCN :	
OCN :	

STATE OF MISSOURI,)	
)	PLAINTIFF,
vs.)	
)	
MATTHEW G. BRUMMETT)	
)	CASE NO. 2016-CR02341
DOB: 02/14/1983)	
Race/Sex: W/M)	
SSN: XXX-XX-XXXX)	
)	
And)	
)	CASE NO. 2016-CR02344
CHARLES W. PRICHARD)	
)	DIVISION 8
DOB: 11/13/1972)	
Race/Sex: W/M)	
SSN: XXX-XX-XXXX)	
)	
)	DEFENDANTS.

SUPERSEDING INDICTMENT

**In the Circuit Court of Jackson County, Missouri, at Kansas City, March Term, 2020.
In Division Number 8 thereof, designated by the rules of said Court as Criminal Division A.**

Count I. Assault - 3rd Degree (565.054-002Y20171399.0)

The Grand Jurors of the County of Jackson, State of Missouri, charge that defendants, in violation of Section 565.054, RSMo, committed the **Class E Felony of Assault in the Third Degree**, punishable upon conviction under Sections 558.002 and 558.011, RSMo, in that on or about May 24, 2019, in the County of Jackson, State of Missouri, defendant Matthew G. Brummett and defendant Charles W. Prichard, acting purposefully in concert with each other, knowingly caused physical injury to Bryan Hill, aka Breona Hill or aka Briya Hill by slamming her face against the concrete sidewalk, kneeling her in the face, torso, and ribs, and forcefully bending her arms over her head while her hands were handcuffed and she was laying on her stomach.

The range of punishment for a class E felony is imprisonment in the custody of the Missouri Department of Corrections for a term of years not less than two (2) years and not to exceed four (4) years; or by imprisonment for a special term not to exceed one (1) year in the county jail or other authorized penal institution; or by a fine not to exceed ten thousand dollars (\$10,000); or by both imprisonment and a fine. If money or property has been gained through the commission of the crime, any fine imposed may be not more than double the amount of the offender's gain from the commission of the crime.

Wherefore this Indictment supersedes any Complaint, Information, or Indictment previously filed in the Associate Circuit Court.

A TRUE BILL



FOREPERSON

**JEAN PETERS BAKER
PROSECUTING ATTORNEY
FOR THE COUNTY OF JACKSON,
STATE OF MISSOURI, by**

A handwritten signature in cursive script, appearing to read "Jean Peters Baker".

Received this ____ day of _____, 2020.

SUMMONS TO ISSUE. BOND TO REMAIN AS PREVIOUSLY SET. SPECIAL CONDITIONS SHALL REMAIN IN EFFECT.

WARRANT TO ISSUE. BOND SET AS FOLLOWS: \$ _____.

CIRCUIT COURT JUDGE

WITNESSES:

1. Federal Bureau of Investigation's Agent Michael J. Hartwig, 1300 Summit St., Kansas City, MO 64106
2. Bryan Hill, Prosecuting Atty. Office, 415 E 12th St, Floor 11, Kansas City, MO 64106
3. Angeleic Huth, Prosecuting Atty. Office, 415 E 12th St, Floor 11, Kansas City, MO 64106
4. Michal Huth, Prosecuting Atty. Office, 415 E 12th St, Floor 11, Kansas City, MO 64106
5. Dominique L. Kizine, Prosecuting Atty. Office, 415 E 12th St, Floor 11, Kansas City, MO 64106
6. Eric D Lee, Prosecuting Atty. Office, 415 E 12th St, Floor 11, Kansas City, MO 64106
7. DET Dawn M. Phipps, 1125 Locust, Kansas City, MO 64106
8. SGT Venasa L. Ray, 1125 Locust, Kansas City, MO 64106
9. Roderick E. Reed, Prosecuting Atty. Office, 415 E 12th St, Floor 11, Kansas City, MO 64106
10. Kris Wade, Prosecuting Atty. Office, 415 E 12th St, Floor 11, Kansas City, MO 64106

**IN THE CIRCUIT COURT OF JACKSON COUNTY, MISSOURI
AT KANSAS CITY**

In re: Criminal Record Number: 19-87616 Division 8

Supplemental Evidence Presented and Factual Findings in Support of Indictment

On July 10, 2020 and July 24, 2020, the March 2020 Jackson County Grand Jury re-convened to hear additional evidence concerning the May 24, 2019 arrest of Bryan Hill, a.k.a. Breona or a.k.a. Briya by Defendants Matthew Brummett and Charles Prichard. Based on this review, there is probable cause to believe that Defendants knowingly caused physical injury to Ms. Hill.

I. Evidence Presented

We received additional testimony from Kris Wade and reviewed videos and recorded statements.

II. Supplemental Factual Findings

Following the May 15, 2020 indictment, two witnesses contacted the Jackson County Prosecutor's office to provide information concerning this case. These witnesses were then interviewed.

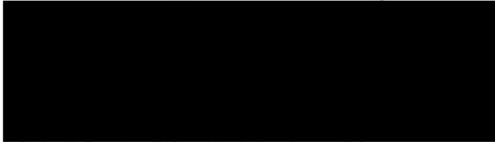
One of the witnesses was working as the lead Kansas City, Missouri Police Department (KCPD) defensive tactics instructor from their Regional Police Academy in the early summer of 2019. During that time, this witness was asked by the KCPD to provide an opinion on the force used by Defendants as shown on the cell phone footage posted in media reports of Ms. Hill's arrest. The opinion given by this witness was that there were various issues with the force used by Defendants, including the handling of Ms. Hill's face and neck and the way in which her arms were forcibly moved. That opinion was supported by this witness's Captains and Major who indicated there were other issues including the knee to Ms. Hill's neck, forceful pushing of her head to the ground, and standing on her hip. The combined position was that the majority of the Defendants' actions were not justified. After this, the witness reported that the Defendants were made to go through re-training to address to these issues.

In this same time period, another witness, a former KCPD officer, who also formerly served as the lead defensive tactics instructor for the KCPD, viewed the media reports concerning Ms. Hill's arrest. This former instructor then contacted a member of the KCPD's command staff to say that there were issues with Defendants' conduct, including the general opinion that the way in which Ms. Hill's neck and face were

handled and the way in which her arms were driven over her head could not be defended when placed against Ms. Hill's actions.

We also received additional information about Ms. Hill's physical state after she left the hospital. Kris Wade testified to meeting Ms. Hill days after the arrest. At that time, she observed Ms. Hill's right eye to be swollen and the injuries to her face were still present. Also, Ms. Wade noted that Ms. Hill was slow to move or turn her upper body or move her arms. Ms. Wade also noted that Ms. Hill would "wince" or struggle to move her arms. This testimony is similar to the statements provided by Roderick Reed who noted that he saw Ms. Hill "three weeks to a month" after the incident and, even then, Ms. Hill's face still showed evidence of bruising and she still complained of pain to her body, including her shoulders.

Submitted by the March 2020 Jackson County Grand Jury,



Grand Jury Foreperson