



**OFFICE OF THE STATE'S ATTORNEY  
COOK COUNTY, ILLINOIS**

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**POLICE INVOLVED DEATH DECISION MEMORANDUM**  
**DECEDENT: TURELL BROWN**

**I. OVERVIEW**

This matter involved the fatal shooting of Turell Brown by Chicago Police Officer Brandon Rambert. During the course of the investigation, investigators interviewed civilian and law enforcement witnesses and reviewed OEMC transmissions, photographs of the scene, police reports, medical records, the Cook County Medical Examiner Post-Mortem Report, the results of forensic examinations, video surveillance, and Body-Worn Camera (BWC) footage.

The Office of the Cook County State's Attorney, as the agency responsible for making criminal charging decisions under Illinois law for incidents that occur in Cook County, reviewed the evidence collected during the investigation to determine whether there was a good faith basis for filing criminal charges. After a thorough review, the Office has concluded that the evidence is insufficient to support criminal charges against Chicago Police Officer Brandon Rambert.

**II. STATEMENT OF FACTS**

The evidence presented at any criminal proceeding resulting from this incident would show as follows: On September 19, 2021, Turell Brown's girlfriend, who will be referred to as "Subject A," was in the basement of her building doing laundry. Brown and Subject A had an argument and Brown hit her with a laundry detergent container. Subject A pushed Brown back

and then Brown began to punch her all over her body. Brown then ran upstairs to the apartment and locked Subject A out of the apartment. Subject A then called Brown on his cell phone, and he eventually let her into the apartment. Once Subject A was in the apartment, Brown hit her again and then he pulled out a kitchen knife and began to pace with it in his hands. Subject A asked him what the knife was for, and Brown responded that it was for her or whoever.

Brown then went toward the back of the apartment and Subject A had the opportunity to call 911. She informed the dispatcher that Brown hit her and that he was armed with a knife. Officer Rambert and his partner were assigned to respond to the call. The officers arrived at Subject A's building, and they proceeded up the stairs to Subject A's apartment. When they knocked on the door, Subject A opened it and the two officers entered the apartment. Subject A told the officers what had occurred with Brown and told them that Brown was located in the back of the apartment and was still armed with a knife. Subject A told the officers that she wanted Brown out of her apartment and that she wanted to press charges against him.

Officer Rambert started walking toward the back of the apartment with his partner following him. As the officers approached the back bedroom, Brown told the officers to get back. The officers unholstered their firearms and retreated out of the apartment into the hallway. Brown came out of the bedroom holding two knives. He came to the doorway between the kitchen and the front room. He waved a knife in the officers' direction and then pointed it towards Subject A who was standing in the opposite corner of the front room.

While looking in Subject A's direction, Brown came through the doorway into the front room. He sidestepped along the wall toward the officers while reaching for the front door. As Brown attempted to reach the front door, Officer Rambert fired three shots from his handgun. Brown fell to the ground and dropped the knives. After kicking away the knives, Officer Rambert's partner began rendering aid to Brown. Another responding officer took Subject A out of the apartment. She told that officer, as well as people that she called on the phone, and CPD detectives, that she was afraid that Brown would try to hurt her if he was able to shut the door. Paramedics responded to the scene where they pronounced Brown deceased.

The officer involved shooting of Brown was captured on the Body Worn Cameras of Officer Rambert and his partner.

A Cook County Medical Examiner performed an autopsy on Brown and determined that the cause of death was multiple gunshot wounds and the manner of death was homicide.

### **III. LEGAL STANDARD**

In making any charging decision, the Office of the Cook County State's Attorney is bound by the Illinois Criminal Code in effect at the time of the incident. The Illinois Use of Force in Defense of Person statute provided in pertinent part:

A person is justified in the use of force against another when and to the extent that he reasonably believes that such conduct is necessary to defend himself or another against such other's imminent use of unlawful force. However, he is justified in the use of force which is intended or likely to cause death or great bodily harm only if he reasonably believes that such force is necessary to prevent imminent death or great bodily harm to himself or another, or the commission of a forcible felony.

720 ILCS 5/7-1(a) (West 2018).

The statute regarding an officer's use of force provided in pertinent part:

A peace officer . . . need not retreat or desist from efforts to make a lawful arrest because of resistance or threatened resistance to the arrest. He is justified in the use of any force which he reasonably believes to be necessary to affect the arrest and of any force which he reasonably believes to be necessary to defend himself or another from bodily harm while making the arrest. However, he is justified in using force likely to cause death or great bodily harm only when he reasonably believes that such force is necessary to prevent death or great bodily harm to himself or such other person, or when he reasonably believes both that: (1) Such force is necessary to prevent the arrest from being defeated by resistance or escape; and (2) the person to be arrested has committed or attempted a forcible felony which involves the infliction or threatened infliction of great bodily harm or is attempting to escape by use of a deadly weapon, or otherwise indicates that he will endanger human life or inflict great bodily harm unless arrested without delay.

720 ILCS 5/7-5(a) (West 2018).

### **IV. ANALYSIS AND CONCLUSION**

A criminal prosecution for either first- or second-degree murder would require proof beyond a reasonable doubt that the involved officer was not legally justified in using deadly force against Turell Brown. In other words, a judge or a jury would have to find that Officer Rambert's belief that he or others were in imminent danger of great bodily harm or death -- was not reasonable. In this case, however, the evidence shows that Officer Rambert did have a

reasonable belief that Brown put Officer Rambert and others in imminent danger of great bodily harm or death.

The analysis for making a charging decision must look at whether the decision by Officer Rambert to use deadly force was reasonable under the totality of the circumstances. The evidence in this case establishes that Officer Rambert and his partner were dispatched to the residence of Subject A, who had told the 911 dispatch operator that Brown had hit her and was wielding a knife.

The evidence supports that Officer Rambert reasonably believed that Brown would have inflicted great bodily harm on Subject A had Brown been able to close the apartment door. First, the dispatcher stated over the radio that Subject A said that her boyfriend had just battered her and was armed with a knife. When the officers arrived, Subject A informed the officers that Brown had punched her multiple times and that he was still armed with the knife. As Brown became visible to the officers, he was captured on BWC footage holding two knives. Upon seeing the knives, the officers gave Brown verbal commands to drop them. Instead, Brown waved the knives in the officers' direction telling them to get back. Then, while he was standing in the doorway, Brown pointed one of the knives in Subject A's direction. Shortly after he pointed the knife in Subject A's direction, Brown moved toward the front door attempting to close it.

At that point, Brown had already punched Subject A and threatened her with the knife. While armed with two knives, which are deadly weapons, he was trying to close the door to defeat his arrest. Thus, it was not unreasonable for Officer Rambert to believe that Subject A, a victim of domestic violence who called 911 to report Brown, would be in danger of great bodily harm from Brown if she was trapped in the apartment with him. In fact, Subject A herself believed that she would be in danger if Brown was able to close the door. She saw Brown give her a "nasty look" and nod in her direction before he reached for the door. She also told multiple people immediately after the incident that she was afraid of what Brown would do to her if he closed the apartment door.

Based on the evidence reviewed in this matter and the applicable legal standards, the evidence is insufficient to support the filing of criminal charges as the use of deadly force by Officer Rambert against Turell Brown was reasonable under the totality of the circumstances.

Therefore, the Cook County State's Attorney's Office will not pursue criminal charges in this case.

Pursuant to policies and legislation enacted at the urging of State's Attorney Foxx, after making its declination determination, the State's Attorney's Office referred the review of the case to the Office of the Illinois State's Attorneys Appellate Prosecutor (ILSAAP) for an additional review. ILSAAP has reviewed the case and on June 6, 2023 concurred that no criminal charges are appropriate.

This conclusion is based entirely on the relevant criminal laws and standards of proof in Illinois and does not limit administrative action by the Chicago Police Department or civil actions where less stringent laws, rules, and legal standards of proof apply. The Office expresses no opinion regarding the propriety or likelihood of success of any such actions.