

1 BENJAMIN B. WAGNER
United States Attorney
2 MICHELLE RODRIGUEZ
Assistant U.S. Attorney
3 501 I Street, Suite 10-100
Sacramento, CA 95814
4 (916) 554-2700

5
6
7
8 IN THE UNITED STATES DISTRICT COURT
9 EASTERN DISTRICT OF CALIFORNIA
10

11 UNITED STATES OF AMERICA,)
12) CR NO.
13 Plaintiff,) VIOLATIONS: 18 U.S.C. §
14) 1512(b)(1) and (b)(2)(B) -
15 v.) Tampering with a Witness, Victim,
16) or Informant (3 Counts); 18 U.S.C.
17 JOHN GERALD POLAND,) § 1512(c)(1) and (2) - Obstruction
18 Defendant.) of Official Proceeding
19)
20)
21)
22)
23)
24)
25)
26)
27)
28)

19
20 I N D I C T M E N T

21 COUNT ONE: [18 U.S.C. § 1512(b)(1) and (b)(2)(B) - Tampering
22 with a Witness, Victim, or Informant]

23 The Grand Jury charges: T H A T

24 JOHN GERALD POLAND,
25 defendant herein, on or about June 29, 2011, in the State and Eastern
26 District of California, did knowingly intimidate, threaten, and
27 corruptly persuade witness V.C., and engage in misleading conduct
28 toward witness V.C., and attempt to do so, with intent to influence,

1 delay, and prevent the testimony of V.C. in an official proceeding,
2 and to cause and induce witness V.C. to alter, destroy, mutilate, and
3 conceal an object, including a cellular telephone, with the intent to
4 impair the object's integrity and availability for use in an official
5 proceeding, to wit a federal drug trafficking investigation of T.G.U.
6 in violation of Title 18, United States Code, Sections 1512(b)(1) and
7 (b)(2)(B).

8 COUNT TWO: [18 U.S.C. § 1512(b)(1) and (b)(2)(B) - Tampering
9 with a Witness, Victim, or Informant]

10 The Grand Jury further charges: T H A T

11 JOHN GERALD POLAND,

12 defendant herein, between on or about October 18, 2011 and on or
13 about November 21, 2011, in the State and Eastern District of
14 California, did knowingly intimidate, threaten, and corruptly
15 persuade witness V.C., and engage in misleading conduct toward
16 witness V.C., and attempt to do so, with intent to influence, delay,
17 and prevent the testimony of V.C. in an official proceeding, and to
18 cause and induce witness V.C. to alter, destroy, mutilate, and
19 conceal an object, including electronic records, telephone records,
20 and his gifts to her, with the intent to impair the object's
21 integrity and availability for use in an official proceeding, to wit
22 a federal drug trafficking investigation of T.G.U. and a federal
23 investigation of defendant Poland for violations of Title 18, United
24 States Code, Sections 245, 1512, 2232, and 2251; all in violation of
25 Title 18, United States Code, Sections 1512(b)(1) and (b)(2)(B).

26 COUNT THREE: [18 U.S.C. § 1512(b)(1) and (b)(2)(B) - Tampering
27 with a Witness, Victim, or Informant]

28 The Grand Jury further charges: T H A T

JOHN GERALD POLAND,

1 defendant herein, between on or about November 29, 2011 and on or
2 about December 20, 2011, in the State and Eastern District of
3 California, did knowingly intimidate, threaten, and corruptly
4 persuade witness A.W., and engage in misleading conduct toward
5 witness A.W., and attempt to do so, with intent to influence, delay,
6 and prevent the testimony of victim A.W. in an official proceeding,
7 and to cause and induce victim A.W. to alter, destroy, mutilate, and
8 conceal an object, including records, notes, and his gifts to her,
9 with the intent to impair the object's integrity and availability for
10 use in an official proceeding, to wit a federal investigation of
11 defendant Poland for violations of Title 18, United States Code,
12 Sections 245, 1512, and 2251; all in violation of Title 18, United
13 States Code, Sections 1512(b)(1) and (b)(2)(B).

14 COUNT FOUR: [18 U.S.C. § 1512(c)(1) and (2) - Obstruction of
15 Official Proceeding]

16 The Grand Jury further charges: T H A T


17 JOHN GERALD POLAND,

18 defendant herein, between on or about June 29, 2011 and December 20,
19 2011, in the State and Eastern District of California, did corruptly
20 alter, destroy, mutilate, and conceal a record, document, and other
21 object with the intent to impair the object's integrity and
22 availability for use in an official proceeding, and did otherwise
23 obstruct, influence, and impede an official proceeding, to wit a
24 federal drug trafficking investigation of T.G.U. and a federal
25 investigation of defendant Poland for violations of Title 18, United
26 States Code, Sections 245, 1512, 2232, and 2251, and attempt to do
27 so, by destroying evidence, by using a GPS jamming device, by using
28 an internet facility to conceal communications, and by providing

1 incomplete and false statements, all in violation of Title 18, United
2 States Code, Sections 1512(c)(1) and (2).

3
4 A TRUE BILL.

5
6 _____
FOREPERSON

7 
8 _____
BENJAMIN B. WAGNER
9 United States Attorney

10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28