

1 DEBRA W. YANG  
United States Attorney  
2 Central District of California  
312 North Spring Street  
3 Los Angeles, California 90012

4 R. ALEXANDER ACOSTA  
Assistant Attorney General  
5 Civil Rights Division  
U.S. Department of Justice  
6 950 Pennsylvania Ave., NW  
Washington, D.C. 20530-6018

7  
8 UNITED STATES DISTRICT COURT  
9 NORTHERN DISTRICT OF CALIFORNIA  
10 SAN FRANCISCO DIVISION  
11

12 UNITED STATES OF AMERICA,	)	No.
	)	
13 Plaintiff,	)	VIOLATION:
	)	Title 18, United States Code, Section
14 v.	)	1519 - Falsifying Records in a Federal
	)	Investigation
15 CHARLES JACKSON,	)	
	)	SAN FRANCISCO VENUE
16 Defendant.	)	
	)	

17  
18 INDICTMENT

19 THE GRAND JURY CHARGES:

20 At all times relevant to this Indictment:

- 21 1. The United States Federal Protective Service (“FPS”) was a federal law enforcement  
22 agency.  
23 2. The Federal Protective Service had jurisdiction on federal property and on streets adjacent  
24 to federal property.  
25 3. Defendant CHARLES JACKSON was an FPS special agent.  
26 4. Peter Taoy (“Taoy”) and John Haire (“Haire”) were FPS police officers.

27 ///

28 ///

1           5. The San Francisco Federal Building was located at 450 Golden Gate Avenue, San  
2 Francisco, California (“the Federal Building”). Taoy and Haire were assigned to patrol the  
3 Federal Building as well as other federal property in San Francisco.

4           6. Jeffrey Petri (“Petri”) was a registered owner of a Mercedes-Benz automobile (“Petri’s  
5 car”).

6           7. On or about February 15, 2003, the FPS assigned defendant CHARLES JACKSON to  
7 investigate an incident in which Taoy claimed that Petri had attempted to assault him with his car  
8 following a vehicle pursuit.

9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28



1 FPS, the United States Attorney's Office for the Northern District of California, and a Federal  
2 Magistrate-Judge in connection with Petri's arrest and detention.

3 All in violation of Title 18, United States Code, Section 1519, a Class B Felony.

4 The Grand Jury further alleges that defendant CHARLES JACKSON substantially interfered  
5 with the administration of justice.

6 The Grand Jury further alleges that defendant CHARLES JACKSON abused a position of  
7 trust that he held as an FPS Special Agent, and did so in a manner that significantly facilitated the  
8 commission of the offense.

9 DATED: \_\_\_\_\_, 2004, at San Francisco, California.

10 A TRUE BILL

11

12 \_\_\_\_\_  
FOREPERSON, GRAND JURY

13 DEBRA W. YANG  
14 United States Attorney  
15 United States Attorney's Office  
312 North Spring Street  
Los Angeles, California 90012

16 By: \_\_\_\_\_  
17 Steven D. Clymer  
Special Assistant United States Attorney  
Chief, Criminal Division

18 R. ALEXANDER ACOSTA  
19 Assistant Attorney General  
Civil Rights Division  
20 U.S. Department of Justice  
950 Pennsylvania Ave., NW  
21 Washington, D.C. 20530-6018

22 By: \_\_\_\_\_  
23 Jerrob Duffy  
Trial Attorney  
Criminal Section

24

25

26

27

28