

# United States District Court

FOR THE  
NORTHERN DISTRICT OF CALIFORNIA

VENUE: SAN FRANCISCO

UNITED STATES OF AMERICA,

V.

*CR18-390 VC*

GREGORY JAMES CHRISMAN,

DEFENDANT(S).

## SUPERSEDING INDICTMENT

18 U.S.C. § 1001(a)(2) – False Statement to Government Agency (Two Counts);  
18 U.S.C. § 1512(b)(1) – Witness Tampering;  
18 U.S.C. § 1512(c)(2) - Obstruction of Justice;  
18 U.S.C. § 401(3) - Contempt of Court

A true bill.

*[Signature]*

Foreman

Filed in open court this 24th day of

October 2019

*[Signature]*

Clerk

*[Signature]* Bail, \$ 110 process

**FILED**  
**OCT 24 2019**  
SUSAN Y. SOONG  
CLERK, U.S. DISTRICT COURT  
NORTH DISTRICT OF CALIFORNIA

**DEFENDANT INFORMATION RELATIVE TO A CRIMINAL ACTION - IN U.S. DISTRICT COURT**
 BY: ☐ COMPLAINT ☐ INFORMATION ☐ INDICTMENT  
☒ SUPERSEDING
**OFFENSE CHARGED**
 18 U.S.C. section 1001(a)(2) -- False Statement to  
 Government Agency (two counts)  
 18 U.S.C. section 1512(b)(1) -- Witness Tampering  
 18 U.S.C. section 1512(c)(2) -- Obstruction of Justice  
 18 U.S.C. section 401(3) -- Contempt of Court

☐ Petty  
☐ Minor  
☐ Misdemeanor  
☒ Felony

PENALTY: see attachment

Name of District Court, and/or Judge/Magistrate Location

NORTHERN DISTRICT OF CALIFORNIA

SAN FRANCISCO DIVISION

**DEFENDANT - U.S.**

GREGORY JAMES CHRISMAN

DISTRICT COURT NUMBER

CR 18-390 VC

 FILED  
 OCT 24 2019  
 SUSAN Y. SOONG  
 CLERK, U.S. DISTRICT COURT  
 NORTH DISTRICT OF CALIFORNIA
**PROCEEDING**

Name of Complainant Agency, or Person (&amp; Title, if any)

☐ person is awaiting trial in another Federal or State Court,  
 give name of court

☐ this person/proceeding is transferred from another district  
 per (circle one) FRCrp 20, 21, or 40. Show District

☐ this is a reprosecution of  
 charges previously dismissed  
 which were dismissed on motion  
 of:

☐ U.S. ATTORNEY ☐ DEFENSE
SHOW  
DOCKET NO.
☒ this prosecution relates to a  
 pending case involving this same  
 defendant
MAGISTRATE  
CASE NO.
☐ prior proceedings or appearance(s)  
 before U.S. Magistrate regarding this  
 defendant were recorded under

Name and Office of Person

Furnishing Information on this form DAVID L. ANDERSON

☒ U.S. Attorney ☐ Other U.S. Agency

Name of Assistant U.S.

Attorney (if assigned)

ALEX G. TSE

**IS NOT IN CUSTODY**

Has not been arrested, pending outcome this proceeding.

 1) ☐ If not detained give date any prior  
 summons was served on above charges
2) ☐ Is a Fugitive3) ☒ Is on Bail or Release from (show District)

NDCA

**IS IN CUSTODY**4) ☐ On this charge5) ☐ On another conviction
☐ Federal ☐ State
6) ☐ Awaiting trial on other charges

If answer to (6) is "Yes", show name of institution

 Has detainer ☐ Yes  
 been filed? ☐ No

 If "Yes"  
 give date  
 filed
DATE OF  
ARREST

Month/Day/Year

Or... if Arresting Agency &amp; Warrant were not

DATE TRANSFERRED  
TO U.S. CUSTODY

Month/Day/Year

☐ This report amends AO 257 previously submitted
**ADDITIONAL INFORMATION OR COMMENTS****PROCESS:**
☐ SUMMONS ☒ NO PROCESS\* ☐ WARRANT

Bail Amount: \_\_\_\_\_

If Summons, complete following:

☐ Arraignment ☐ Initial Appearance

Defendant Address:

 \* Where defendant previously apprehended on complaint, no new summons or  
 warrant needed, since Magistrate has scheduled arraignment

Date/Time: 10/29/19 at 10:30 a.m. Before Judge: Hon. J.S. Corley

Comments:

**ATTACHMENT TO PENALTY SHEET**

Counts 1 and 2 (each count):

18 U.S.C. § 1001(a)(2) – False Statements

Maximum 5 years imprisonment;

Maximum 3 years of supervised release

Maximum \$250,000 fine

Mandatory \$100 special assessment

Count 3:

18 U.S.C. § 1512(b)(1) – Witness Tampering

Maximum 20 years imprisonment and as much as 10 years consecutive term of imprisonment;

Maximum 3 years of supervised release

Maximum \$250,000 fine

Mandatory \$100 special assessment

Count 4:

18 U.S.C. § 1512(c)(1) -- Obstruction of Justice

Maximum 20 years of imprisonment

Maximum 3 years of supervised release

Maximum \$250,000 fine

Mandatory \$100 special assessment

Count 5:

18 U.S.C. § 401(3) – Contempt of Court

Maximum Imprisonment: Discretion of the Court

Maximum Fine: Discretion of the Court

Mandatory special assessment: \$100

DAVID L. ANDERSON (CABN 149604)  
United States Attorney

FILED  
2019 OCT 24 P 1:51  
SUSAN Y. SOONG  
CLERK, US DISTRICT COURT  
NO. DIST. OF CA.

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION

UNITED STATES OF AMERICA,	)	No. CR 18-390 VC
Plaintiff,	)	
v.	)	<u>VIOLATIONS:</u>
GREGORY JAMES CHRISMAN,	)	18 U.S.C. § 1001(a)(2) – False Statement to
Defendant.	)	Government Agency (Two Counts)
	)	18 U.S.C. § 1512(b)(1) – Witness Tampering
	)	18 U.S.C. § 1512(c)(2) – Obstruction of Justice
	)	18 U.S.C. § 401(3) – Contempt of Court
	)	SAN FRANCISCO VENUE

SUPERSEDING INDICTMENT

The Grand Jury charges:

COUNT ONE: (18 U.S.C. § 1001(a)(2) – False Statement to Government Agency)

On or about December 10, 2017, in the Northern District of California, the defendant,  
GREGORY JAMES CHRISMAN,  
did willfully and knowingly make a materially false, fictitious, and fraudulent statement and  
representations in a matter within the jurisdiction of the Federal Aviation Administration, an agency  
within the executive branch of the Government of the United States, specifically: his false statements on  
a Federal Aviation Administration Form 8500-8 indicating that: (1) he did not have and had never had a  
mental disorder of any sort (Question 18m), despite having represented to the United States Department

SUPERSEDING INDICTMENT

1 of Veterans Affairs that he had posttraumatic stress disorder and having received medical disability  
2 benefits as a result of that condition; and (2) he had never and did not currently receive medical  
3 disability benefits (Question 18y), despite having received service-related medical disability benefits  
4 from the Department of Veterans Affairs since 2011. All in violation of Title 18, United States Code,  
5 Section 1001(a)(2).

6 COUNT TWO: (18 U.S.C. § 1001(a)(2) – False Statement to Government Agency)

7 On or about June 24, 2018, in the Northern District of California, the defendant,  
8 GREGORY JAMES CHRISMAN,  
9 did willfully and knowingly make a materially false, fictitious, and fraudulent statements and  
10 representations in a matter within the jurisdiction of the Federal Aviation Administration, an agency  
11 within the executive branch of the Government of the United States, specifically his false statements on  
12 a Federal Aviation Administration Form 8500-8, indicating that: (1) he did not have and had never had  
13 a mental disorder of any sort (Question 18m), despite having represented to the United States  
14 Department of Veterans Affairs that he had posttraumatic stress disorder and having received service-  
15 related medical disability benefits as a result of that condition; and (2) he had never and did not currently  
16 receive medical disability benefits (Question 18y), despite having received service-related medical  
17 disability benefits from the Department of Veterans Affairs since 2011. All in violation of Title 18,  
18 United States Code, Section 1001(a)(2).

19 COUNT THREE: (18 U.S.C. § 1512 (b)(1) – Witness Tampering)

20 Beginning on or about January 7, 2019, and continuing through on or about January 14, 2019, in  
21 the Northern District of California, the defendant,

22 GREGORY JAMES CHRISMAN,  
23 did knowingly use intimidation, threaten and attempt to corruptly persuade another person with the  
24 intent to influence, delay or prevent the testimony of a person, to wit, W. B., M.D., in an official  
25 proceeding. All in violation of Title 18, United States Code, Sections 1512 (b)(1) and 3147.

26 COUNT FOUR: (18 U.S.C. § 1512 (c)(2)) – Obstruction of Justice)

27 Beginning on or about January 7, 2019, and continuing through on or about January 14, 2019, in  
28 the Northern District of California, the defendant,

GREGORY JAMES CHRISMAN,

willfully and knowingly corruptly influenced, obstructed, and impeded the due and proper administration of the law under which an official proceeding was being had and contemplated before a department and agency of the United States, namely the Department of Transportation and Federal Aviation Administration in violation of Title 18, United States Code, Section 1512(c)(2) and 3147.

COUNT FIVE: (18 U.S.C. § 401(3) – Contempt of Court)

Beginning on or about January 7, 2019, and continuing through on or about January 14, 2019, in the Northern District of California, the defendant,

GREGORY JAMES CHRISMAN,

did willfully disobey and resist a clear and definite lawful order, rule, decree, and command of a court of the United States of which defendant was aware, specifically, an order, rule, decree, and command issued by the United States District Court for the Northern District of California in criminal case number 18-390 VC, and did so with consciousness of guilt with respect to the charges of making false statements alleged in the Indictment in that case and which are now alleged as Counts One and Two of this Superseding Indictment. All in violation of Title 18, United States Code, Section 401(3).

DATED: 10/24/19

A TRUE BILL



FOREPERSON

DAVID L. ANDERSON  
United States Attorney



ALEX G. TSE  
Assistant United States Attorney

SUPERSEDING INDICTMENT

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA

CRIMINAL COVER SHEET

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**Instructions:** Effective November 1, 2016, this Criminal Cover Sheet must be completed and submitted, along with the Defendant Information Form, for each new criminal case.

CASE NAME:

USA v. GREGORY JAMES CHRISMAN

CASE NUMBER:

CR 18-390 VC

Is This Case Under Seal?

Yes No ☒

Total Number of Defendants:

1 ☒ 2-7 8 or more

Does this case involve ONLY charges  
under 8 U.S.C. § 1325 and/or 1326?

Yes No ☒

Venue (Per Crim. L.R. 18-1):

SF ☒ OAK SJ

Is this a potential high-cost case?

Yes No ☒

Is any defendant charged with  
a death-penalty-eligible crime?

Yes No ☒

Is this a RICO Act gang case?

Yes No ☒

Assigned AUSA

(Lead Attorney): AUSA ALEX G. TSE

Date Submitted: 10/24/19

Comments: