

United States District Court

FOR THE
NORTHERN DISTRICT OF CALIFORNIA

VENUE: OAKLAND

FILED

Aug 16 2023

Mark B. Busby
CLERK, U.S. DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO

UNITED STATES OF AMERICA,

V.

TIMOTHY ALLEN MANLY WILLIAMS

DEFENDANT(S).

INDICTMENT

18 U.S.C. § 1519 – Destruction, Alteration, and Falsification of Records in Federal Investigations;

18 U.S.C. § 1512(c)(2) – Obstruction of Official Proceedings;

18 U.S.C. § 242 – Deprivation of Rights Under Color of Law

A true bill.

/s/ Foreperson of the Grand Jury

Foreman

Filed in open court this 16th day of

August.

Brittany Sims

Brittany Sims, Clerk

Lisa J. Cisneros Bail, \$ NO BAIL

Hon. Magistrate Judge Lisa J. Cisneros

1 ISMAIL J. RAMSEY (CABN 189820)
United States Attorney

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CLERK, U.S. DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO

8 UNITED STATES DISTRICT COURT
9 NORTHERN DISTRICT OF CALIFORNIA
10 OAKLAND DIVISION

11 UNITED STATES OF AMERICA,) CASE NO. 4:23-cr-00267 YGR
12 Plaintiff,)
13 v.) VIOLATIONS:
14 TIMOTHY ALLEN MANLY WILLIAMS,) 18 U.S.C. § 1519 – Destruction, Alteration, and
15 Defendant.) Falsification of Records in Federal Investigations;
16) 18 U.S.C. § 1512(c)(2) – Obstruction of Official
17) Proceedings;
18) 18 U.S.C. § 242 – Deprivation of Rights Under Color
19) of Law
20) OAKLAND VENUE

18 INDICTMENT

19 The Grand Jury charges:

20 Introductory Allegations

21 At all times relevant to this Indictment:

22 1. The Antioch Police Department (“APD”) was the police department for the city of
23 Antioch, located in the Northern District of California. The APD and its officers were charged with the
24 duty of enforcing the laws of the State of California in accordance with the Constitution and laws of the
25 United States. APD formed the Problem-Oriented Policing (POP) team in approximately July 2020 and
26 disbanded it in approximately October 2021.

27 2. Timothy Allen MANLY WILLIAMS (“MANLY”) was a police officer with the APD in
28 the city of Antioch, California. While at APD, MANLY’s assignments included being a member of the

INDICTMENT

1 POP team.

2
3 COUNT ONE: (18 U.S.C. § 1519 – Destruction, Alteration, and Falsification of Records in
4 Federal Investigations)

5 3. Paragraphs 1 and 2 of this Indictment are re-alleged and incorporated as if fully set forth
6 here.

7 4. On or about March 23, 2021, MANLY was working on a wiretap operation related to a
8 gang-related murder that occurred in Antioch, and which was being investigated by APD with
9 assistance from federal agencies, including the Federal Bureau of Investigation. A judge of the Superior
10 Court of Contra Costa County authorized wiretaps on several telephone lines and Instagram accounts.
11 One of those telephone lines was for a number ending in -0869 (“TT-09”), which was used by a target of
12 the wiretap. As discussed below, while MANLY was assigned to monitor the wiretap, he called TT-09
13 using his (MANLY’s) personal telephone, and took steps to prevent that call from being recorded and to
14 prevent accurate records of the call from being created.

15 5. Shortly after 9:00 p.m. on March 23, 2021, while on duty as a monitor in the wire room,
16 MANLY dialed TT-09 using his own mobile phone (*i.e.*, his personal telephone, not the telephone
17 issued to him by the police department). Prior to dialing TT-09, MANLY dialed “*67.” The call
18 connected with audio for approximately 14 seconds.

19 6. In his capacity as a wire room monitor, after dialing the target’s number MANLY acted
20 to ensure the call was “minimized” and classify the call as “non-pertinent.” During a typical wiretap,
21 the investigative team attempts to limit the monitoring of non-pertinent conversations by ceasing
22 monitoring during part or all of a non-pertinent conversation, a process referred to as “minimizing.” A
23 call is not recorded by the wiretap equipment while minimized, so its audio cannot be recovered for
24 evidentiary purposes. Here, MANLY ensured that his call to TT-09 was minimized and not recorded.

25 7. After his call to TT-09 was complete and had already disconnected, MANLY then
26 activated monitoring on that line for approximately 19 seconds.

27 8. For the call synopsis concerning the monitoring of TT-09, which MANLY was required
28 to complete as part of the wire logs, MANLY wrote: “No audio, Manly #6102.” On a duplicate entry,

1 he wrote: “Incoming call no answer. Manly #6102.” “6102” was MANLY’s badge number.

2 9. On or about March 23, 2021, in the Northern District of California, the defendant,

3 TIMOTHY ALLEN MANLY WILLIAMS,

4 did knowingly alter, destroy, mutilate, conceal, cover up, falsify, and make a false entry in any record,
5 document, and tangible object, to wit, wiretap records of TT-09 in the wiretap authorized by Contra
6 Costa County Superior Court number 21-002 on or about March 19, 2021, with the intent to impede,
7 obstruct, and influence the investigation and proper administration of any matter within the jurisdiction
8 of the Federal Bureau of Investigation, an agency of the United States, and in relation to or
9 contemplation of any such matter or case, in violation of Title 18, United States Code, Section 1519.

10
11 COUNT TWO: (18 U.S.C. § 1512(c)(2) – Obstruction of Official Proceedings)

12 10. Paragraphs 1 through 8 of this Indictment are re-alleged and incorporated as if fully set
13 forth here.

14 11. On or about March 23, 2021, in the Northern District of California, the defendant,

15 TIMOTHY ALLEN MANLY WILLIAMS,

16 did corruptly obstruct and impede, or attempt to obstruct and impede, an official proceeding, to wit, a
17 federal grand jury investigation in the Northern District of California involving the wiretap authorized
18 by Contra Costa County Superior Court number 21-002 on or about March 19, 2021, in violation of
19 Title 18, United States Code, Section 1512(c)(2).

20
21 COUNT THREE: (18 U.S.C. § 242 – Deprivation of Rights Under Color of Law)

22 12. Paragraphs 1 and 2 of this Indictment is re-alleged and incorporated as if fully set forth
23 here.

24 13. Victim-1 was a resident of Antioch, California.

25 14. On or about May 6, 2021, Victim-1 used his cellular telephone to attempt to record the
26 aftermath of an incident involving an Antioch police officer deploying a police dog in the course of
27 arresting another person. MANLY was on duty and present at the scene and observed Victim-1
28 attempting to use his telephone to record. MANLY seized the telephone from Victim-1 and destroyed it.

