

SEALED BY ORDER
OF THE COURT

AO 257 (Rev. 6/78)

DEFENDANT INFORMATION RELATIVE TO A CRIMINAL ACTION - IN U.S. DISTRICT COURTBY: ☐ COMPLAINT ☐ INFORMATION ☒ INDICTMENT
☐ SUPERSEDING**OFFENSE CHARGED**

See attached sheet.

- ☐ Petty
☐ Minor
☐ Misdemeanor
☒ Felony

PENALTY: See attached sheet.

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

NORTHERN DISTRICT OF CALIFORNIA

OAKLAND DIVISION

DEFENDANT - U.S.

Paul Raymond Flood

DISTRICT COURT NUMBER

CR-24-0268

FILED
MAY 16 2024
CLERK, U.S. DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

DEFENDANT

HSG

PROCEEDING

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

DOJ-OIG

☐ 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 ☐ DEFENSESHOW
DOCKET NO.☐ this prosecution relates to a pending case involving this same defendantMAGISTRATE
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 Ismail J. Ramsey

☒ U.S. Attorney ☐ Other U.S. Agency

Name of Assistant U.S.

Attorney (if assigned)

AUSA Anne C. Hsieh

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 charges2) ☐ Is a Fugitive3) ☐ Is on Bail or Release from (show District)**IS IN CUSTODY**4) ☐ On this charge5) ☐ On another conviction☐ Federal ☐ State6) ☐ Awaiting trial on other charges

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

Has detainer been filed? ☐ Yes ☐ No

If "Yes" give date filed

DATE OF
ARREST

Month/Day/Year

Or... if Arresting Agency & 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: No Bail

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: Before Judge:

Comments:

PENALTY SHEET ATTACHMENT

United States v. Paul Raymond Flood

Count One: 18 U.S.C. § 2261A(2)(B) – Cyberstalking

- *Maximum Penalties:*

- Imprisonment: 5 years
- Fine: \$250,000
- Supervised Release: 3 years
- Special Assessment: \$100
- Restitution

Counts Two and Three: 18 U.S.C. § 1512(b)(2) and (b)(3) – Witness Tampering by Intimidation, Corrupt Persuasion, or Deception/Misleading Conduct

- *Maximum Penalties:*

- Imprisonment: 20 years
- Fine: \$250,000
- Supervised Release: 3 years
- Special Assessment: \$100
- Restitution
- Forfeiture

Count Four: 18 U.S.C. § 1512(d) – Witness Tampering by Harassment

- *Maximum Penalties:*

- Imprisonment: 3 years
- Fine: \$250,000
- Supervised Release: 1 year
- Special Assessment: \$100
- Restitution
- Forfeiture

Count Five: 18 U.S.C. § 1510 - Obstruction of Criminal Investigation by Bribery

- *Maximum Penalties:*

- Imprisonment: 5 years
- Fine: \$250,000
- Supervised Release: 3 years
- Special Assessment: \$100
- Restitution
- Forfeiture

SEALED BY ORDER
OF THE COURT

United States District Court

FOR THE
NORTHERN DISTRICT OF CALIFORNIA

VENUE: OAKLAND

FILED
MAY 16 2024
CLERK, U.S. DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,

V.

PAUL RAYMOND FLOOD

CR-24-0268

HSG

DEFENDANT(S).

INDICTMENT

18 U.S.C. § 2261A(2)(B) (Cyberstalking)
18 U.S.C. § 1512(b)(2) and (b)(3) (Witness Tampering by Intimidation, Threats,
Corrupt Persuasion, Misleading Conduct)
18 U.S.C. § 1512(d) (Witness Tampering by Harassment;
18 U.S.C. § 1510(a) (Obstruction of a Criminal Investigation by Bribery)
18 U.S.C. § 981(a)(1)(C) & 28 U.S.C. § 2461 (Criminal Forfeiture)

A true bill.

/s/ Foreperson of the Grand Jury
Foreman

Filed in open court this 16th day of

May, 2024

Jury L. Garcia 5/16/24
Clerk

Bail, \$ No Bail

Donna M. Ryu 5/16/24
HON. DONNA M. RYU, Chief Magistrate Judge

SEALED BY ORDER
OF THE COURT

FILED

MAY 16 2024

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

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

OAKLAND DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

v.

PAUL RAYMOND FLOOD,

Defendant.

CASE NO.

CR-24-0268

VIOLATIONS:

18 U.S.C. § 2261A(2)(B) – Cyberstalking;

18 U.S.C. §§ 1512(b)(2) and (b)(3) – Witness

Tampering by Intimidation, Threats, Corrupt
Persuasion, and Misleading Conduct;

18 U.S.C. § 1512(d) – Witness Tampering by
Harassment;

18 U.S.C. § 1510(a) – Obstruction of a Criminal
Investigation by Bribery

18 U.S.C. § 981(a)(1)(C) & 28 U.S.C. § 2461 –
Criminal Forfeiture

OAKLAND VENUE

INDICTMENT

The Grand Jury charges:

Introductory Allegations

At all times relevant to this Indictment:

1. From 2007 through 2019, defendant PAUL RAYMOND FLOOD (“FLOOD”) was employed as a Special Agent with the Federal Bureau of Investigation (“FBI”) and worked and resided in the Northern District of California.

2. In or around early October 2018, FLOOD met an individual referred herein to as Victim-

INDICTMENT

1 ("V-1"). At the time, V-1 was a first-year law student who resided in the Northern District of California. V-1 was interested in a future career as an FBI agent and asked her brother (herein referred to as "B-1") if he knew anyone who could provide her more information on the matter. B-1 referred V-1 to FLOOD, whom B-1 knew due to B-1's prior contacts with law enforcement.

3. At first, FLOOD responded professionally to V-1's request for advice on joining the FBI. Within a few weeks of meeting her, however, FLOOD began to make unwelcome romantic advances toward V-1. When V-1 tried to decline and ignore FLOOD's advances, FLOOD began engaging in a harassing and intimidating course of conduct toward V-1, as further described below. FLOOD's course of conduct escalated during varying periods over the next year and continued even after V-1 reported FLOOD to law enforcement in June 2019.

Cyberstalking

4. Beginning in or around October 2018 and continuing until at least in or about October 2019, in the Northern District of California, FLOOD, with the intent to harass, intimidate, and place under surveillance with intent to harass and intimidate, V-1, used the mail, an interactive computer service, an electronic communication service, an electronic communication system of interstate commerce, and other facilities of interstate and foreign commerce, to engage in a course of conduct, described further below, that caused, attempted to cause, and would reasonably be expected to cause substantial emotional distress to V-1.

5. Flood's course of conduct included, amongst other acts, the following:

a. In mid-October 2018, FLOOD told V-1 that he wanted to give her a diamond ring for her upcoming birthday. After V-1 repeatedly declined FLOOD's offer, and then stopped responding to him, FLOOD ordered B-1 to deliver the gift to his sister. Upon receiving the ring, V-1 immediately messaged FLOOD to tell him she did not want it. FLOOD told V-1 to keep it or sell it, but when V-1 did not respond again, FLOOD continued to text and call her from multiple numbers on a repeated basis.

b. V-1 tried ignoring FLOOD's texts and calls, blocked his numbers, and begged him on several occasions to stop and to leave her and her family alone. Despite her efforts, FLOOD persisted in repeatedly calling and texting V-1 using different numbers and messaging applications for periods of time over the course of the next year. Whenever V-1 blocked FLOOD's number, he would

1 create new numbers to contact her. Between mid-October 2018 through September 2019, FLOOD
2 created and used at least 79 different numbers to contact V-1.

3 c. FLOOD also sent repeated communications to B-1, telling B-1 to have his sister
4 call or unblock FLOOD. FLOOD often pressured B-1 to intervene by reminding B-1 of FLOOD's
5 influence over B-1's pending deportation proceedings and the family's criminal matters. FLOOD's
6 conduct led to multiple arguments between V-1 and B-1 on how to handle the situation. As FLOOD's
7 course of conduct escalated, V-1 wanted to report FLOOD to get him to stop. B-1 strongly objected,
8 fearing FLOOD's power to retaliate against him and other family members. As a result, V-1 agreed not
9 to report FLOOD initially.

10 d. FLOOD's incessant and unprompted messages to V-1 widely ranged in topic. For
11 example, between late October through mid-December 2018, FLOOD sent texts demanding V-1 talk to
12 him, asking her to explain why she had gone silent, accusing her of acting "like such a bitch towards me
13 when I was nothing but nice," informing her the ring he gave her was a family heirloom and telling her
14 to return it if she would not speak to him, apologizing and providing lengthy explanations for his
15 behavior, and fluctuating between professions of love and derogatory insults.

16 e. FLOOD also sent messages demonstrating that he was surveilling V-1 and her
17 family by sharing unsolicited information that he obtained through law enforcement channels about their
18 activities and whereabouts. For example, in October 2018, amidst a string of unanswered messages
19 from FLOOD to V-1, FLOOD asked, "You're in LA? Maybe that's why you won't respond." V-1 had
20 not informed FLOOD of her location at the time. In November 2018, FLOOD provided V-1 unsolicited
21 flight status updates and details regarding V-1's father's international travel, which FLOOD obtained via
22 law enforcement channels. In or around May 2019, during an Oakland Police Department ("OPD") visit
23 pertaining to one of V-1's brothers, FLOOD randomly called V-1 from an unrecognized number and
24 asked her about OPD and V-1's brother.

25 f. On several occasions, FLOOD threatened to visit V-1 in person if she did not
26 respond to him, and sometimes followed through. For example:

27 i. In or around late October 2019, FLOOD sent V-1 several messages that he would
28 come by with flowers or to retrieve the ring he had given her, such as: "Do I need

1 to ask [B-1] to ask you if it's OK to come by tomorrow," "WTF? I gave you a
 2 \$7K ring and didn't ask for anything in return, can you at least say something to
 3 me?" and "I'll swing by with flowers in about 30 minutes."

4 ii. On May 31, 2019, FLOOD texted V-1, "Please have a conversation and stop
 5 blocking me or I'll come to [V-1's family's business], you can get me fired, and I
 6 put a bullet in my head."

7 iii. On June 2, 2019, FLOOD texted V-1, "I'm going start dropping off white roses at
 8 your doorstep every day. Please don't call police," then, "Sorry didn't have all
 9 white and had to buy mix." When V-1 responded, "Stay the fuck away from me,"
 10 he replied "Forever?" When she responded, "You're a fucking maniac! I'm
 11 blocking this shit too!," he proceeded to text her from other numbers.

12 iv. In early June, FLOOD went to V-1's residence and knocked on her door while
 13 she hid inside the home. FLOOD eventually departed, leaving flowers and a
 14 diamond ring on her doorstep.

15 g. In the month between May 22, 2019, until about June 22, 2019, FLOOD used at
 16 least 32 different numbers to contact V-1 while she repeatedly tried to block him. During this period,
 17 FLOOD again used multiple tactics to try to bait V-1 to talk to him, which included claiming that her
 18 brothers were being targeted by law enforcement and sharing law enforcement sensitive information
 19 with V-1 to support his claims. For example:

20 i. On or about May 30, 2019, FLOOD sent V-1 a series messages via WhatsApp,
 21 including: "Fuck. I want to stop your brother but can't say anything," "If I tell
 22 you, you tell your brother and they talk about me. I'm fucked but want to help."
 23 When V-1 finally asked, "What are you talking about?," FLOOD named one of
 24 V-1's brothers, and stated, "Tell him to stop doing anything illegal." After V-1
 25 responded, "Wtf are you talking about," "No one is doing anything illegal," "Get
 26 away from us!" and blocked FLOOD, he created new numbers and continued to
 27 send V-1 similar texts about her brothers.

28 ii. On June 6, 2019, FLOOD texted V-1, "Look. You need to see something. You

1 know that I would help your family because of you. I'm really worried about your
2 brothers using my name if they get into trouble or telling anyone else," then
3 texted, "people are gunning for them." In response, V-1 told FLOOD he was
4 lying and blocked him. FLOOD then texted her with a new number and shared
5 the name of an individual who FLOOD claimed was "gonna save himself and
6 fuck up your brothers." When V-1 blocked FLOOD again, he used another
7 number to send her a screenshot of a law enforcement email to support his claims,
8 and told her, "If you want to see rest, you can" and "Meet somewhere and you can
9 see." FLOOD continued this pattern until June 11, 2019, by which point he had
10 sent V-1 multiple screenshots of documents containing confidential and sensitive
11 information pertaining to law enforcement targets.

12 6. On or about June 21, 2019, V-1 finally reported FLOOD's conduct to both federal and
13 local law enforcement. Shortly thereafter, FLOOD was suspended from duty with FBI, and the U.S.
14 Department of Justice Office of the Inspector General (DOJ-OIG) opened a law enforcement
15 investigation into FLOOD's criminal conduct. A federal grand jury in the Northern District of
16 California also opened an investigation. By early July 2019, FLOOD was aware of the pending
17 investigations against him.

18 7. Immediately following V-1's report, FLOOD continued to text and call V-1, again
19 creating new numbers to contact her every time she blocked him. For example, between June 23 and
20 July 1, 2019, FLOOD used at least 16 different numbers to contact V-1.

21 8. In his communications beginning on or around June 21, 2019, FLOOD employed various
22 means to pressure, harass, intimidate, and persuade V-1 to help him by not providing statements or
23 testimony in the investigations against him. This included: blaming and guiltting V-1 for ruining his life
24 and career by reporting him; threatening to commit suicide if V-1 did not help him; offering V-1 various
25 bribes to help him; and similarly pressuring B-1 to persuade V-1 to help FLOOD. As a result, V-1
26 experienced significant guilt from FLOOD, B-1, and other family members regarding her decision to
27 report FLOOD and its potential consequences to her family.

28 9. FLOOD also claimed to V-1 that, because of the sensitive information he had shared with

1 V-1 in his messages to her, DOJ-OIG would hold her liable as his co-conspirator if she testified or
2 cooperated with their investigation. FLOOD told V-1 that the best way to avoid further trouble was for
3 them to marry so that V-1 could invoke the spousal privilege if she was called to testify against him.

4 10. By early July 2019, FLOOD was able to persuade V-1 to help him obstruct the pending
5 investigations against him. Consequently, V-1 evaded multiple attempts by DOJ-OIG investigators to
6 contact her for an interview and to serve her with a federal grand jury subpoena in July 2019. For
7 example, on July 10, 2019, when two DOJ-OIG agents attempted to serve V-1 with a grand jury
8 subpoena outside V-1's residence, V-1 ran away from the agents and fled in her vehicle. V-1 also hired
9 an attorney to represent her in the DOJ-OIG investigation, and FLOOD agreed to reimburse V-1 for the
10 attorney's fees.

11 11. By mid-July 2019, FLOOD also persuaded V-1 to agree to his plan of entering a sham
12 marriage so that V-1 could avoid testifying against him in future proceedings. As part of the scheme,
13 FLOOD told V-1 he would buy her an engagement ring, and they should shop for the ring together in a
14 store with security cameras so there would be video evidence to make their marriage look legitimate.
15 On or about July 17, 2019, FLOOD took V-1 to a jewelry store in San Francisco, where he bought her
16 an engagement ring that cost approximately \$17,000. On July 18, 2019, V-1 left the country on a family
17 vacation for the next three months.

18 12. During V-1's overseas trip, FLOOD continued to contact V-1 to ensure she was still
19 willing to help him with the DOJ-OIG investigation. FLOOD's conduct included asking her regularly if
20 she had heard any updates from her attorney regarding the investigation, as well as sending V-1 money
21 transfers as part of their agreement for her to help him.

22 13. At times when V-1 stopped responding, however, FLOOD would resume his pattern of
23 sending V-1 repeated and harassing texts, which included threats to commit suicide if she did not talk to
24 him or agree to help him. For example, on or about July 27, 2019, FLOOD sent V-1 a series of texts
25 threatening suicide, such as: "You killed me. Pray to fucking Allah you don't call in my death when you
26 return nobody will find me for months," "You ruined my life and killed me. At least your mother never
27 killed anyone," "Keep blocking me. I'll just make new numbers all day. Watch me kill myself. Probably
28 fun for you," and "I'm dead because of you." FLOOD also sent V-1 a photograph of himself holding a

1 gun to his head and the message, “video chat now if you want to see a former FBI agent and non-
2 believer commit suicide.” V-1 immediately notified one of her brothers back home, who contacted local
3 law enforcement for help.

4 14. FLOOD also engaged in insulting language and defamatory accusations toward and about
5 V-1, particularly when she was not responsive or seemed no longer willing to help him. For example,
6 on or about July 27, 2019, FLOOD texted B-1, claiming that V-1 had sex with FLOOD and another
7 person, knowing that the claim was false and particularly slanderous to V-1 due to her strict religious
8 beliefs. When V-1 confronted FLOOD in response, he apologized for the lie. At various times, FLOOD
9 called V-1 derogatory names, such as “bitch,” “scammer,” “slut,” and “evil cunt,” and made insulting
10 references to her religion. For instance, in a text on September 10, 2019, Flood wrote, “How would you
11 feel about finding a loving God instead of the Muslim monster of death that asks you to destroy the lives
12 of non believers? Your God turned you into a monster but you can change.”

13 15. In early September 2019, V-1 returned from her overseas trip and initially told FLOOD
14 that she was still willing to proceed with the sham marriage plan. However, when V-1 did not follow
15 through, FLOOD quickly resumed his harassing conduct. On or about September 9, 2019, FLOOD sent
16 a series of escalating messages and expressed his intent to come by her house, despite her repeated
17 warnings that she would “call the cops” if he did. On or about September 10, 2019, FLOOD arrived at
18 V-1’s home, refused to leave, and was arrested by local police.

19 16. At the time of FLOOD’s arrest, V-1 decided that she was no longer willing to put up with
20 FLOOD’s conduct or help him as she had previously agreed. On or about September 10, 2019, V-1
21 returned DOJ-OIG’s calls and agreed to an interview. Within the next few weeks, V-1 also filed for a
22 state restraining order against FLOOD.

23 17. After his arrest and the restraining order, FLOOD continued to contact V-1. For
24 example, the morning after his arrest on September 10, 2019, FLOOD texted V-1, “I’m coming to your
25 house to talk, let me know if it’s an issue.” Flood also continued to claim to V-1 that she would get in
26 trouble if she talked to DOJ-OIG investigators. In a handwritten letter to V-1 postmarked September 14,
27 2019, FLOOD wrote: “San Leandro PD turned my phone over to DOJ. There were conversations about
28 you helping me avoid jail with DOJ. They may threaten you with that if they talk to you.”

18. FLOOD's repeated violations of the state restraining order eventually led to another arrest by state law enforcement on or about October 15, 2019, and subsequent misdemeanor charges in Alameda County.

COUNT ONE: (18 U.S.C. § 2261A(2)(B) – Cyberstalking)

19. Paragraphs 1 through 18 of this Indictment are re-alleged and incorporated as if fully set forth here.

20. Beginning in or around October 2018 and continuing until at least in or about October 2019, in the Northern District of California, the defendant,

PAUL RAYMOND FLOOD,

with the intent to harass, intimidate, and place under surveillance with intent to harass and intimidate, another person, namely: Victim-1 ("V-1"), used the mail, an interactive computer service, an electronic communication service, an electronic communication system of interstate commerce, and other facilities of interstate and foreign commerce, to engage in a course of conduct that caused, attempted to cause, and would reasonably be expected to cause substantial emotional distress to a person, namely: V-1.

All in violation of Title 18, United States Code, Section 2261A(2)(B).

Witness Tampering and Obstruction

21. Between on or about June 21, 2019, through in or about October 2019, FLOOD engaged in a course of conduct to intimidate, threaten, corruptly persuade, and engage in misleading conduct toward V-1, with the intent to hinder, delay, and prevent V-1 from communicating to DOJ-OIG investigators, and to cause V-1 to withhold testimony from an official proceeding, which included, but is not limited to, the following:

a. FLOOD's communications and actions that caused B-1 and V-1 to fear that FLOOD would retaliate against their family, or commit harm to himself or others, if V-1 did not help FLOOD in obstructing the pending investigation and proceedings against him;

b. FLOOD's attempts to bribe V-1 into helping him with offers and payments of money and material things (such as a Corvette, jewelry, and his house);

c. FLOOD's misleading and intimidating claims to V-1 that she would be held criminally liable if she cooperated in the investigations against him; and

d. FLOOD's efforts to persuade V-1 to engage in a deceptive scheme that involved entering into a sham marriage and taking steps to make it appear legitimate, so that V-1 could invoke the spousal privilege and withhold testimony at pending and future official proceedings against FLOOD.

COUNT TWO: (18 U.S.C. § 1512(b)(2) – Witness Tampering by Intimidation, Threats, Corrupt Persuasion, and Misleading Conduct)

22. Paragraphs 1 through 18 and 21 of this Indictment are re-alleged and incorporated as if fully set forth here.

23. Between on or about June 21, 2019, and continuing through on or about September 14, 2019, in the Northern District of California, the defendant,

PAUL RAYMOND FLOOD,

did knowingly intimidate, threaten, and corruptly persuade another person, namely: Victim-1, and attempt to intimidate, threaten, and corruptly persuade Victim-1, and engage in misleading conduct toward Victim-1, with the intent to cause and induce Victim-1 to withhold testimony from an official proceeding, namely: a federal grand jury proceeding in the Northern District of California,

All in violation of Title 18, United States Code, Section 1512(b)(2).

COUNT THREE: (18 U.S.C. § 1512(b)(3) – Witness Tampering by Intimidation, Threats, Corrupt Persuasion, or Misleading Conduct)

24. Paragraphs 1 through 18 and 21 of this Indictment are re-alleged and incorporated as if fully set forth here.

25. Between on or about June 21, 2019, and continuing through on or about September 14, 2019, in the Northern District of California, the defendant,

PAUL RAYMOND FLOOD,

did knowingly intimidate, threaten, and corruptly persuade another person, namely: Victim-1, and attempt to intimidate, threaten, and corruptly persuade Victim-1, and engage in misleading conduct toward Victim-1, with the intent to hinder, delay, and prevent Victim-1 from communicating to a law enforcement officer, namely: Special Agents of the U.S. Department of Justice Office of Inspector General, information related to the commission or possible commission of a Federal offense,

All in violation of Title 18, United States Code, Section 1512(b)(3).

1 COUNT FOUR: (18 U.S.C. § 1512(d) – Witness Tampering by Harassment)

2 26. Paragraphs 1 through 18 and 21 of this Indictment are re-alleged and incorporated as if
3 fully set forth here.

4 27. Between on or about June 21, 2019 through in or about October 2019, in the Northern
5 District of California, the defendant,

6 PAUL RAYMOND FLOOD,

7 did intentionally harass another person, namely: Victim-1, and did thereby hinder, delay, prevent, and
8 dissuade V-1 from attending and testifying in an official proceeding, namely: a federal grand jury
9 proceeding in the Northern District of California, and attempted to do so,

10 All in violation of Title 18, United States Code, Section 1512(d).

11 COUNT FIVE: (18 U.S.C. § 1510(a) – Obstruction of Criminal Investigation by Bribery)

12 28. Paragraphs 1 through 18 and 21 of this Indictment are re-alleged and incorporated as if
13 fully set forth here.

14 29. Between on or about July 16, 2019, through on or about September 14, 2019, in the
15 Northern District of California, the defendant,

16 PAUL RAYMOND FLOOD,

17 by means of bribery, did willfully endeavor to obstruct, delay, and prevent another person, namely:
18 Victim-1, from communicating information relating to a violation of criminal statute of the United
19 States to criminal investigators with the U.S. Department of Justice Office of the Inspector General.

20 All in violation of Title 18, United States Code, Section 1510(a).

21 FORFEITURE ALLEGATION: (18 U.S.C. § 981(a)(1)(C) and 28 U.S.C. § 2461 – Criminal
22 Forfeiture)

23 30. The allegations in paragraphs 1 through 29 are re-alleged and incorporated by reference
24 for the purpose of alleging forfeiture pursuant to Title 18, United States Code, Sections 981(a)(1)(C) and
25 Title 28, United States Code, Section 2461(c).

26 31. Upon conviction of the offenses alleged in Counts Two through Five, the defendant,

27 PAUL RAYMOND FLOOD,

28 shall forfeit to the United States pursuant to Title 18, United States Code, Sections 981(a)(1)(C) and Title

28, United States Code, Section 2461, any property, real or personal, which constitutes or is derived from proceeds traceable to said violations, including but not limited to a sum of money equal to the total proceeds from the commission of said offense.

32. If, as a result of any act or omission of the defendant, any of said property;

a. cannot be located upon the exercise of due diligence;

b. has been transferred or sold to or deposited with a third person;

c. has been placed beyond the jurisdiction of the Court;

d. has been substantially diminished in value; or

e. has been commingled with other property, which cannot be divided without difficulty;

the United States shall be entitled to forfeiture of substitute property, pursuant to Title 21, United States Code, Section 853(p), as incorporated by Title 18, United States Code, Section 982(b)(1), and Title 28, United States Code, Section 2461(c).

All pursuant to Title 18, United States Code, Sections 981(a)(1)(C) and Title 28, United States Code, Section 2461.

DATED:

A TRUE BILL.


FOREPERSON

ISMAIL J. RAMSEY
United States Attorney


ANNE C. HSIEH
Assistant United States Attorney

SEALED BY ORDER
OF THE COURTUNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

FILED

MAY 16 2024

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

CRIMINAL COVER SHEET

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. Paul Raymond Flood

CASE NUMBER:

CR

CR-24-0268

HSG

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): Anne C. Hsieh

Date Submitted:

Comments: