Comments:

SEALED BY ORDER OF THE COURT

DEFENDANT INFORMATION RELATIVE TO A CRIMINAL ACTION - IN U.S. DISTRICT COURT				
BY: COMPLAINT INFORMATION INDICTMENT SUPERSEDING	Name of District Court, and/or Judge/Magistrate Location NORTHERN DISTRICT OF CALIFORNIA			
OFFENSE CHARGED - SOPERSEDING	OAKLAND DIVISION			
Count One: 18 U.S.C. § 371 (Conspiracy to Commit Bribery Concerning Programs Receiving Federal Funds) Minor				
Count Two: 18 U.S.C. §§ 666(a)(2), 2 (Paying a Bribe and Aiding and Abetting) Misde means	- DAVID SANSON			
PENALTY: Count One Count Two - 5 years' imprisonment - \$250,000 fine - 3 years' supervised release - \$100 special assessment - Forfeiture - Selont Two - 10 years' imprisonment - \$250,000 fine - 3 years' supervised release - \$100 special assessment - Forfeiture	CR 25 0090 YGR			
	DEFENDANT			
PROCEEDING Name of Complaintant Agency, or Person (& Title, if any) Federal Bureau of Investigation	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			
person is awaiting trial in another Federal or State Court, give name of court	2) Is a Fugitive			
this person/proceeding is transferred from another district per (circle one) FRCrp 20, 21, or 40. Show District	3) Son Bail or Release from (show District) APR 3 2025 IS IN CUSTODY 4) On this charge NORTHERN DISTRICT OF CALIFORNIA			
this is a reprosecution of charges previously dismissed which were dismissed on motion of: U.S. ATTORNEY DEFENSE	5) On another conviction			
this prosecution relates to a pending case involving this same defendant prior proceedings or appearance(s) before U.S. Magistrate regarding this defendant were recorded under	Has detainer Yes If "Yes" give date filed DATE OF Month/Day/Year ARREST Or if Arresting Agency & Warrant were not			
Name and Office of Person Furnishing Information on this form Patrick D. Robbins	DATE TRANSFERRED Month/Day/Year TO U.S. CUSTODY			
Name of Assistant U.S. Attorney (if assigned) Other U.S. Agency Thomas R. Green	This report amends AO 257 previously submitted			
PROCESS: ADDITIONAL INFORMATION OR COMMENTS				
☐ SUMMONS ☐ NO PROCESS* ☒ WARRANT	Bail Amount: No Bail			
If Summons, complete following: Arraignment Initial Appearance	* Where defendant previously apprehended on complaint, no new summons or warrant needed, since Magistrate has scheduled arraignment			
Defendant Address:	The second seco			
	Date/Time: Before Judge:			

SEALED BY ORDER OF THE COURT

DEFENDANT INFORMATION RELATIVE TO A CRIMINAL ACTION - IN U.S. DISTRICT COURT				
BY: COMPLAINT INFORMATION INDICTMENT	Name of District Court, and/or Judge/Magistrate Location			
OFFENSE CHARGED SUPERSEDING	April 100 April			
Count One: 18 U.S.C. § 371 (Conspiracy to Commit Bribery Concerning Programs Receiving Federal Funds) Minor	C DEFENDANT - U.S			
Count Two: 18 U.S.C. §§ 666(a)(2), 2 (Paying a Bribe and Aiding and Abetting) Misde mean	TRENT SANSON			
PENALTY: Count One -5 years' imprisonment -\$250,000 fine -3 years' supervised release -\$100 special assessment -Forfeiture - Count Two - 10 years' imprisonment - \$250,000 fine - 3 years' supervised release - \$100 special assessment - Forfeiture - Forfeiture	DISTRICT COURT NUMBER CR 25 0090 DEFENDANT			
PROCEEDING	IS NOT IN CUSTODY			
Name of Complaintant Agency, or Person (& Title, if any) Federal Bureau of Investigation	Has not been arrested, pending outcome this proceeding. 1) X If not detained give date any prior summons was served on above charges			
person is awaiting trial in another Federal or State Court, give name of court	2) S a Fugitive			
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 this prosecution relates to a pending case involving this same defendant prior proceedings or appearance(s) before U.S. Magistrate regarding this	6) Awaiting trial on other charges If answer to (6) is "Yes", show name of institution Has detainer Yes If "Yes" give date			
defendant were recorded under	Or if Arresting Agency & Warrant were not			
Name and Office of Person Furnishing Information on this form Patrick D. Robbins	DATE TRANSFERRED Month/Day/Year TO U.S. CUSTODY			
□ U.S. Attorney □ Other U.S. Agency				
Name of Assistant U.S. Attorney (if assigned) Thomas R. Green	This report amends AO 257 previously submitted			
PROCESS: ADDITIONAL INF	ORMATION OR COMMENTS ————————————————————————————————————			
SUMMONS NO PROCESS* WARRANT	Bail Amount: No Bail			
If Summons, complete following: Arraignment Initial Appearance	* Where defendant previously apprehended on complaint, no new summons or			
Defendant Address:	warrant needed, since Magistrate has scheduled arraignment			
	Date/Time: Before Judge:			
Comments:				

SEALED BY ORDER OF THE COURT

United States District Court

FILED

APR 3 2025

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

FOR THE NORTHERN DISTRICT OF CALIFORNIA

VENUE: OAKLAND

UNITED STATES OF AMERICA,

V.

DAVID SANSON, and TRENT SANSON,

CR 25 0090 YGR

DEFENDANT(S).

INDICTMENT

18 U.S.C. § 371 – Conspiracy;
18 U.S.C. § 666(a)(2) – Bribery Concerning Programs Receiving Federal Funds,
18 U.S.C. § 2 – Aiding and Abetting;
18 U.S.C. § 981(a)(1)(C) and 28 U.S.C. § 2461(c) – Forfeiture Allegation

Hon. Donna M. Ryu, U.S. Chief Magistrate Judge

Foreman

Filed in open court this 3rd day of

April, 2025

April, 2025

Clerk

Bail, \$ Arrest Warrants

OF THE COURT

PATRICK D. ROBBINS (CABN 152288) Acting United States Attorney

APR 3 2025

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

UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA

OAKLAND DIVISION

1	UNITED STATES OF AMERICA,) CASE NO.
2	Plaintiff,	CR 25 0090
3	· v .) VIOLATION: 18 U.S.C. § 371 – Conspiracy;
- 1	DAVID SANSON, and TRENT SANSON,) 18 U.S.C. § 666(a)(2) – Bribery Concerning) Programs Receiving Federal Funds, 18 U.S.C. § 2 –
5	Defendants.) Aiding and Abetting;
6	Defendants.) 18 U.S.C. § 981(a)(1)(C) and 28 U.S.C. § 2461(c) –) Forfeiture Allegation
7		
8) OAKLAND VENUE

INDICTMENT

The Grand Jury charges:

At all times relevant to this Indictment:

Overview

1. Beginning on a date unknown to the grand jury but no later than on or about May 29, 2024, and continuing through at least June 20, 2024, the defendants, DAVID SANSON and TRENT SANSON, owners of a home building and development company (the "Development Company") located within the Northern District of California, engaged in a bribery scheme wherein they bribed a councilmember of the City of Antioch (the "Councilmember"). The scheme involved an offer of \$10,000 in exchange for favorable treatment for one of the Development Company's building projects,

INDICTMENT

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the Aviano project. TRENT SANSON and DAVID SANSON bribed the Councilmember during videorecorded meetings, including a meeting at which TRENT SANSON offered the \$10,000 bribe to the Councilmember and a subsequent meeting at which DAVID SANSON gave the Councilmember a travel coffee mug branded with the Development Company's logo and name containing \$5,000 in cash.

2. The Councilmember reported the incidents to the Federal Bureau of Investigation ("FBI"), and the meetings with TRENT SANSON and DAVID SANSON were recorded at the direction of the FBI.

Relevant Individuals, Entities, and Terms

- 3. The Development Company is based in Concord, California, and has a number of development projects underway in Antioch and the neighboring areas.
- David Sanson ("D. SANSON") is the owner and Chief Executive Officer of the 4. Development Company.
- Trent Sanson ("T. SANSON") is D. SANSON's son and the Vice President of the Development Company.
- 6. The Aviano project ("Aviano") is a multi-phase 533-unit residential development project, approved by the City of Antioch and built by the Development Company. One of those building phases is described as Phase 3 of Aviano.
- 7. The City of Antioch is a municipality located in the Northern District of California. Antioch is governed by a mayor and four city councilmembers that collectively comprise a five-person council. Each Councilmember is an agent of the City of Antioch. Among other things, Councilmembers can have matters placed on the council agenda and then vote on those matters, such as the completion of construction projects in Antioch.
- Antioch received more than \$10,000 in benefits from federal programs during the 8. relevant one-year period, including the 2023-2024 fiscal year from July 1, 2023, to June 30, 2024.
- 9. An independent expenditure ("IE") is an expenditure for a communication, such as an advertisement, that: (1) expressly advocates for the election or defeat of a clearly identified political candidate; and (2) is not made in consultation or cooperation with, or at the request or suggestion of any candidate, or his or her authorized committees or agents, or a political party committee or its agents.

10. A Political Action Committee ("PAC") is a committee organized for the purpose of raising and spending money to elect and defeat candidates.

Background Regarding the Aviano Development Project in June 2024

- 11. In or around June 2024, staff within the Antioch Engineering and Development Services Division indicated that the Development Company had not completed all of the public infrastructure improvements that were required of the Development Company. Accordingly, the Antioch Engineering and Development Services Division maintained that Phase 3 of Aviano should not be deemed complete or approved by the City Council until those improvements were completed. As a result, the Antioch government had not approved the release of bonds secured for the development project.
- 12. T. SANSON and D. SANSON, however, contended that their company had completed all work required in connection with Phase 3 of the Aviano development project, and they wanted the Antioch Engineering and Development Services Division to affirm completion and release the bonds associated with the project.
- 13. Unable to persuade the Antioch Engineering and Development Services Division that their company had satisfied its obligations and release the bond, T. SANSON reached out to the Councilmember to intervene.

May 29, 2024: T. SANSON Contacts the Councilmember to Meet Regarding Aviano

14. On or about May 29, 2024, T. SANSON contacted the Councilmember via iMessage. T. SANSON stated he wanted to discuss issues that the Development Company was facing with the Antioch "Engineering department" on a number of projects, including Phase 3 of Aviano. T. SANSON and the Councilmember agreed to meet on June 12, 2024, to discuss the items raised by T. SANSON.

June 12, 2024: T. SANSON Bribes the Councilmember

15. On or about June 12, 2024, T. SANSON met with the Councilmember and stated that he wanted the Councilmember to place on the Antioch City Council agenda, and vote in favor of, the following item: "A tract acceptance for Phase 3 at Aviano to release the completion and guarantee bonds" T. SANSON asked the Councilmember for the Councilmember's assistance and vote in the hopes that the Antioch City Council would approve release of the bond and effectively override the Antioch Engineering and Development Services Division's position that further work was required by

the Development Company to complete its obligations on Phase 3 of Aviano.

16. In exchange for the Councilmember's actions, T. SANSON told the Councilmember that he spoke with his father, D. SANSON, in advance of the meeting, and D. SANSON was "willing" to pay the Councilmember \$10,000. T. SANSON stated, "[Y]ou're not going to see anything directly, but Dave will be doing something for you[.]" T. SANSON then added, "I don't know if it's an IE or through a PAC because we . . . can give to a PAC and then the PAC isn't limited, you know what I mean?" Shortly thereafter, T. SANSON reiterated, "I'm pretty sure we'll go through one of the PACs." T. SANSON ultimately told the Councilmember that he'd check with D. SANSON to determine if they could pay \$5,000 to the Councilmember's IE account and \$5,000 in cash. T. SANSON stated that the split "sounds fair." The Councilmember informed the FBI of the bribe offer by T. SANSON.

June 20, 2024: D. SANSON Pays the Bribe Initiated by T. SANSON

17. On or about June 20, 2024, D. SANSON met with the Councilmember. During the meeting, D. SANSON told the Councilmember, "Anyways, Trent called me and told me that he met with you last week, and I told him OK let me take care of it. I don't want you involved." D. SANSON thanked the Councilmember for meeting with him, stating, "I know it was last minute, but this had to be done in person." D. SANSON informed the Councilmember that he'd been in touch with the political consultant running the Councilmember's IE, stating, "[T]hat's all still on track for round two. We did it during the primary, and now for the general – we're back committed to supporting you and all that. So, I just want you to know that's happening – that it's not just a false commitment or anything like that; and then Trent told me you needed a little extra shot." D. SANSON then handed the Councilmember a travel coffee mug branded with the Development Company insignia, which contained \$5,000 in cash. The Councilmember informed D. SANSON that he had a detailed conversation with T. SANSON, and that he understood what D. SANSON and T. SANSON were asking him to do. D. SANSON replied,

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"Yeah – Phase 3," and reiterated, "the project has been finished." The Councilmember informed the FBI of D. SANSON's bribe and gave the money to the FBI.







COUNT ONE:

(18 U.S.C. § 371 - Conspiracy)

- 18. Paragraphs 1 to 17 are hereby re-alleged and incorporated by reference as if fully set forth herein.
- 19. Beginning on an unknown date, but no later than May 29, 2024, and continuing through at least on or about June 20, 2024, in the Northern District of California and elsewhere, the defendants,

DAVID SANSON, and TRENT SANSON,

did knowingly and intentionally conspire with each other and others, known and unknown to the Grand Jury, to commit offenses against the United States, namely to commit bribery of an official of a local government that received funds under a federal program in violation of Title 18, United States Code, Section 666(a)(2).

20. It was a further part and an object of the conspiracy that D. SANSON, T. SANSON, and others known and unknown to the Grand Jury, directly and indirectly, would and did corruptly give, offer, and agree to give a thing of value to the Councilmember, intending to influence the Councilmember in connection with any business, transaction, or series of transactions involving a thing of value of \$5,000 or more before the City of Antioch, which, in a one-year period, received benefits in excess of \$10,000 under a federal program involving a grant, contract, subsidy, loan, guarantee,

insurance, and other form of federal assistance, in violation of 18, United States Code, Section 666(a)(2).

- 21. To further the conspiracy and effect the objects thereof, D. SANSON, T. SANSON, and others, known and unknown to the Grand Jury, committed the following overt acts, each in the Northern District of California:
 - a. On or about May 29, 2024, T. SANSON contacted the Councilmember via iMessage and stated he wanted to discuss issues that the Development Company was facing with the Antioch "Engineering department" on a number of projects, including Phase 3 of Aviano.
 - b. On or about June 12, 2024, T. SANSON met with the Councilmember and during the course of their meeting, explained that he and D. SANSON were willing to pay the Councilmember \$10,000 in exchange for the Councilmember's efforts to place on the Antioch City Council agenda, and vote in favor of, "[a] tract acceptance for Phase 3 at Aviano to release the completion and guarantee bond "
 - c. On or about June 20, 2024, D. SANSON paid the Councilmember \$5,000 in cash in furtherance of the bribery scheme.

All in violation of Title 18, United States Code, Section 371.

(18 U.S.C. §§ 666(a)(2), 2 – Bribery Concerning Programs Receiving Federal COUNT TWO: Funds and Aiding and Abetting)

- 22. Paragraphs 1 to 21 are hereby re-alleged and incorporated by reference as if fully set forth herein.
- 23. Beginning on an unknown date, but no later than May 29, 2024, and continuing through at least on or about June 20, 2024, in the Northern District of California and elsewhere, the defendants,

DAVID SANSON, and TRENT SANSON

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aided and abetted each by the other, corruptly gave, offered, and agreed to give anything of value to any person, with intent to influence or reward an agent of a local government, to wit, the City of Antioch, in connection with any business, transaction, or series of transactions involving a thing of value of \$5,000 or more before the City of Antioch, which, in a one-year period, received benefits in excess of \$10,000

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under a federal program involving a grant, contract, subsidy, loan, guarantee, insurance, and other form of federal assistance. Specifically, D. SANSON and T. SANSON gave, offered, and agreed to give, including but not limited to, (1) \$5,000 in cash and (2) a \$5,000 campaign payment to an Antioch City Councilmember with the intent to influence (1) the Councilmember's efforts to add an item to the City Council agenda regarding Phase 3 of the Aviano project and (2) the Councilmember's vote on a prospective City Council agenda item related to the completion of Phase 3 of the Aviano project.

All in violation of 18, United States Code, Sections 666(a)(2) and 2.

FORFEITURE ALLEGATION:

(18 U.S.C. § 981 and 28 U.S.C. § 2461)

- 24. The allegations contained in this Indictment are re-alleged and incorporated by reference for the purpose of alleging forfeiture pursuant to Title 18, United States Code, Section 981 and Title 28, United States Code, Section 2461.
 - 25. Upon conviction for any offense set forth above in this Indictment, the defendants,

DAVID SANSON, and TRENT SANSON.

shall forfeit to the United States, pursuant to Title 18, United States Code, Section 981(a)(1)(C) and Title 28, United States Code, Section 2461(c), any and all property, real or personal, constituting or derived from proceeds obtained directly and indirectly as the result of the violation, including but not limited to a forfeiture money judgment.

If any of the property described above, as a result of any act or omission of the defendant:

- a. cannot be located upon exercise of due diligence;
- b. has been transferred or sold to, or deposited with, a third party;
- c. has been placed beyond the jurisdiction of the court;
- d. has been substantially diminished in value; or
- has been commingled with other property which cannot be divided without difficulty,

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

All pursuant to Title 18, United States Code, Section 981, Title 28, United States Code,

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1	Section 2461, and Federal Rule of C	Criminal Procedure 32.2.
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3	DATED: April 3, 2025	A TRUE BILL.
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6		FOREPERSON
7 8	PATRICK D. ROBBINS Acting United States Attorney	
9	7.7	
10	THOMAS R. GREEN	
11	BENJAMIN K. KLEINMAN Assistant United States Attorneys	
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UNITED STATES DISTRICT COURT NORTHERN DISTRICT OF CALIFORNIA NORTHERN DISTRICT OF CALIFORNIA

CLERK, U.S. DISTRICT COURT

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: CASE NUMBER: CR 25 0090 USA v. David Sanson and Trent Sanson CR Is This Case Under Seal? Yes ✓ No **Total Number of Defendants:** 1 2-7 1 8 or more Does this case involve ONLY charges Yes No V under 8 U.S.C. § 1325 and/or 1326? SF Venue (Per Crim. L.R. 18-1): OAK / SJ Is this a potential high-cost case? Yes No V Is any defendant charged with Yes No V a death-penalty-eligible crime? Is this a RICO Act gang case? Yes No Assigned AUSA (Lead Attorney): Thomas R. Green Date Submitted: 4/3/2025 Comments:

Co-counsel: Benjamin K. Kleinman