

DEFENDANT INFORMATION RELATIVE TO A CRIMINAL ACTION - IN U.S. DISTRICT COURT

BY: [] COMPLAINT [] INFORMATION [X] INDICTMENT [] SUPERSEDING

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

NORTHERN DISTRICT OF CALIFORNIA OAKLAND DIVISION

OFFENSE CHARGED

Count One: 18 U.S.C. § 371 (Conspiracy to Commit Bribery Concerning Programs Receiving Federal Funds) [] Petty [] Minor
Count Two: 18 U.S.C. §§ 666(a)(2), 2 (Paying a Bribe and Aiding and Abetting) [] Misdemeanor [X] Felony

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

DEFENDANT - U.S.

DAVID SANSON

DISTRICT COURT NUMBER

CR 25 0090 YGR

PROCEEDING

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

Federal Bureau of Investigation

[] 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: SHOW DOCKET NO.

[] U.S. ATTORNEY [] DEFENSE

[] 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 Patrick D. Robbins

[X] U.S. Attorney [] Other U.S. Agency

Name of Assistant U.S. Attorney (if assigned) Thomas R. Green

DEFENDANT

IS NOT IN CUSTODY

Has not been arrested, pending outcome this proceeding. 1) [X] If not detained give date any prior summons was served on above charges

2) [] Is a Fugitive

3) [] Is on Bail or Release from (show District)

FILED APR 3 2025

IS IN CUSTODY

4) [] On this charge CLERK, U.S. DISTRICT COURT NORTHERN DISTRICT OF CALIFORNIA

5) [] On another conviction [] Federal [] State

6) [] 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* [X] 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:

Date/Time: Before Judge:

Comments:

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

NORTHERN DISTRICT OF CALIFORNIA OAKLAND DIVISION

DEFENDANT - U.S.

TRENT SANSON

DISTRICT COURT NUMBER

CR 25 0090 YGR

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FILED

APR 3 2025

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

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Date/Time: Before Judge:

Comments:

SEALED BY ORDER
OF THE COURT

United States District Court

FOR THE
NORTHERN DISTRICT OF CALIFORNIA

VENUE: OAKLAND

FILED

APR 3 2025 *AR*

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

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

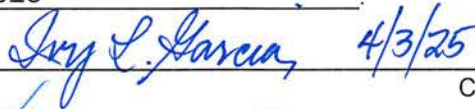
A true bill.




Foreman

Filed in open court this 3rd day of

April, 2025



Clerk



Bail, \$ Arrest Warrants

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

SEALED BY ORDER
OF THE COURT

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

FILED

APR 3 2025

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

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

11 UNITED STATES OF AMERICA,

12 Plaintiff,

13 v.

14 DAVID SANSON, and
TRENT SANSON,

15 Defendants.

) CASE NO.

CR 25 0090

YGR

) VIOLATION:

) 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

) OAKLAND VENUE

18
19 INDICTMENT

20 The Grand Jury charges:

21 At all times relevant to this Indictment:

22 Overview

23 1. Beginning on a date unknown to the grand jury but no later than on or about May 29,
24 2024, and continuing through at least June 20, 2024, the defendants, DAVID SANSON and TRENT
25 SANSON, owners of a home building and development company (the “Development Company”)
26 located within the Northern District of California, engaged in a bribery scheme wherein they bribed a
27 councilmember of the City of Antioch (the “Councilmember”). The scheme involved an offer of
28 \$10,000 in exchange for favorable treatment for one of the Development Company’s building projects,

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

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

8 Relevant Individuals, Entities, and Terms

9 3. The Development Company is based in Concord, California, and has a number of
10 development projects underway in Antioch and the neighboring areas.

11 4. David Sanson ("D. SANSON") is the owner and Chief Executive Officer of the
12 Development Company.

13 5. Trent Sanson ("T. SANSON") is D. SANSON's son and the Vice President of the
14 Development Company.

15 6. The Aviano project ("Aviano") is a multi-phase 533-unit residential development project,
16 approved by the City of Antioch and built by the Development Company. One of those building phases
17 is described as Phase 3 of Aviano.

18 7. The City of Antioch is a municipality located in the Northern District of California.
19 Antioch is governed by a mayor and four city councilmembers that collectively comprise a five-person
20 council. Each Councilmember is an agent of the City of Antioch. Among other things,
21 Councilmembers can have matters placed on the council agenda and then vote on those matters, such as
22 the completion of construction projects in Antioch.

23 8. Antioch received more than \$10,000 in benefits from federal programs during the
24 relevant one-year period, including the 2023-2024 fiscal year from July 1, 2023, to June 30, 2024.

25 9. An independent expenditure ("IE") is an expenditure for a communication, such as an
26 advertisement, that: (1) expressly advocates for the election or defeat of a clearly identified political
27 candidate; and (2) is not made in consultation or cooperation with, or at the request or suggestion of any
28 candidate, or his or her authorized committees or agents, or a political party committee or its agents.

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

3 Background Regarding the Aviano Development Project in June 2024

4 11. In or around June 2024, staff within the Antioch Engineering and Development Services
5 Division indicated that the Development Company had not completed all of the public infrastructure
6 improvements that were required of the Development Company. Accordingly, the Antioch Engineering
7 and Development Services Division maintained that Phase 3 of Aviano should not be deemed complete
8 or approved by the City Council until those improvements were completed. As a result, the Antioch
9 government had not approved the release of bonds secured for the development project.

10 12. T. SANSON and D. SANSON, however, contended that their company had completed all
11 work required in connection with Phase 3 of the Aviano development project, and they wanted the
12 Antioch Engineering and Development Services Division to affirm completion and release the bonds
13 associated with the project.

14 13. Unable to persuade the Antioch Engineering and Development Services Division that
15 their company had satisfied its obligations and release the bond, T. SANSON reached out to the
16 Councilmember to intervene.

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

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

22 June 12, 2024: T. SANSON Bribes the Councilmember

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

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

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

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

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

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1 “Yeah – Phase 3,” and reiterated, “the project has been finished.” The Councilmember informed the
2 FBI of D. SANSON’s bribe and gave the money to the FBI.



11
12 COUNT ONE: (18 U.S.C. § 371 – Conspiracy)

13 18. Paragraphs 1 to 17 are hereby re-alleged and incorporated by reference as if fully set
14 forth herein.

15 19. Beginning on an unknown date, but no later than May 29, 2024, and continuing through
16 at least on or about June 20, 2024, in the Northern District of California and elsewhere, the defendants,

17 DAVID SANSON, and
18 TRENT SANSON,

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

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

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

3 21. To further the conspiracy and effect the objects thereof, D. SANSON, T. SANSON, and
4 others, known and unknown to the Grand Jury, committed the following overt acts, each in the Northern
5 District of California:

- 6 a. On or about May 29, 2024, T. SANSON contacted the Councilmember via iMessage and
7 stated he wanted to discuss issues that the Development Company was facing with the
8 Antioch “Engineering department” on a number of projects, including Phase 3 of Aviano.
9 b. On or about June 12, 2024, T. SANSON met with the Councilmember and during the
10 course of their meeting, explained that he and D. SANSON were willing to pay the
11 Councilmember \$10,000 in exchange for the Councilmember’s efforts to place on the
12 Antioch City Council agenda, and vote in favor of, “[a] tract acceptance for Phase 3 at
13 Aviano to release the completion and guarantee bond”
14 c. On or about June 20, 2024, D. SANSON paid the Councilmember \$5,000 in cash in
15 furtherance of the bribery scheme.

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

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

19 22. Paragraphs 1 to 21 are hereby re-alleged and incorporated by reference as if fully set
20 forth herein.

21 23. Beginning on an unknown date, but no later than May 29, 2024, and continuing through
22 at least on or about June 20, 2024, in the Northern District of California and elsewhere, the defendants,

23 DAVID SANSON, and
24 TRENT SANSON

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

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

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

8 FORFEITURE ALLEGATION: (18 U.S.C. § 981 and 28 U.S.C. § 2461)

9 24. The allegations contained in this Indictment are re-alleged and incorporated by reference
10 for the purpose of alleging forfeiture pursuant to Title 18, United States Code, Section 981 and Title 28,
11 United States Code, Section 2461.

12 25. Upon conviction for any offense set forth above in this Indictment, the defendants,

13 DAVID SANSON, and
14 TRENT SANSON,

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

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

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

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

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

1 Section 2461, and Federal Rule of Criminal Procedure 32.2.

2

3 DATED: April 3, 2025

A TRUE BILL.

4


FOREPERSON

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7 PATRICK D. ROBBINS
Acting United States Attorney

8

9

/s/ _____

10 THOMAS R. GREEN
11 BENJAMIN K. KLEINMAN
Assistant United States Attorneys

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SEALED BY ORDER
OF THE COURT

FILED

APR 3 2025

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

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. David Sanson and Trent Sanson

CASE NUMBER:

CR CR 25 009r
YGR

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): Thomas R. Green

Date Submitted: 4/3/2025

Comments:

Co-counsel: Benjamin K. Kleinman