

# United States District Court

FOR THE  
NORTHERN DISTRICT OF CALIFORNIA

VENUE: SAN FRANCISCO

UNITED STATES OF AMERICA,

V.

CHRISTINA ANN MOBLEY

DEFENDANT(S).

<p><b>FILED</b></p> <p>Feb 05 2025</p> <p>Mark B. Busby CLERK, U.S. DISTRICT COURT NORTHERN DISTRICT OF CALIFORNIA SAN FRANCISCO</p>
--


## INDICTMENT


18 U.S.C. § 1341 – Mail Fraud;  
18 U.S.C. § 1343 – Wire Fraud.

\_\_\_\_\_  
A true bill.

\_\_\_\_\_  
/s/ Foreperson of the Grand Jury  
Foreman

\_\_\_\_\_  
Filed in open court this 5th day of  
February, 2025

\_\_\_\_\_  
  
Clerk

\_\_\_\_\_  
  
Bail, \$ No Process  
Hon. Laurel Beeler, U.S. Magistrate Judge

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

**FILED**  
  
Feb 05 2025  
  
Mark B. Busby  
CLERK, U.S. DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO

3  
4  
5  
6  
7  
8 UNITED STATES DISTRICT COURT  
9 NORTHERN DISTRICT OF CALIFORNIA  
10 SAN FRANCISCO DIVISION

11 UNITED STATES OF AMERICA, ) CASE NO. CR25-00030 CRB  
12 Plaintiff, )  
13 v. ) VIOLATIONS:  
14 CHRISTINA ANN MOBLEY, ) 18 U.S.C. § 1341 – Mail Fraud;  
a/k/a “Kris Mobley,” ) 18 U.S.C. § 1343 – Wire Fraud;  
15 Defendant. ) 18 U.S.C. § 981(a)(1)(C) and 982; 28 U.S.C. § 2461 –  
16 ) Forfeiture Allegation  
17 ) SAN FRANCISCO VENUE  
18 )

18 INDICTMENT

19 The Grand Jury charges:

20 Introductory Allegations

21 At all times relevant to this Indictment:

22 1. The defendant, CHRISTINA ANN MOBLEY, resided in Fortuna, California, and served  
23 as the business manager for a construction company (the “Victim Company”) based in Fortuna,  
24 California. MOBLEY had been employed by the Victim Company starting in the early 1990s and was  
25 employed by the Victim Company into 2025. In 2019 or 2020, the bookkeeper for Victim Company  
26 retired, and MOBLEY assumed that person’s responsibilities. MOBLEY managed the Victim  
27 Company’s accounting and bookkeeping including preparing and entering accounting entries into the  
28 firm’s accounting software. MOBLEY also assisted with bill payments, payroll taxes, employee health

INDICTMENT

1 benefits, government contracts, and a variety of other tasks. MOBLEY was a trusted employee of the  
2 Victim Company, and she was considered a valuable member of the team running the company.

3 2. The Victim Company maintained a bank account at Umpqua Bank, ending in 9019  
4 (“Umpqua account x9019”). The Victim Company had several business credit cards through Umpqua  
5 for its employees. The Victim Company also held a business credit card at Capital One, account ending  
6 in 8851.

7 3. MOBLEY maintained at least two personal credit card accounts at Capital One, accounts  
8 ending in 2811 and 6943 (“Capital One account x2811” and “Capital One account x6943”).

9 4. Beginning not later than in or about January 2022 and continuing at least until in or about  
10 November 2024, MOBLEY executed a scheme to defraud the Victim Company of more than \$500,000  
11 for the benefit of MOBLEY.

12 5. This scheme took the form of writing checks from the Victim’s company account at  
13 Umpqua Bank and sending them through the United States mail to Capital One. Instead of having those  
14 checks applied to the Victim Company’s business credit card account at Capital One, MOBLEY  
15 directed Capital One to apply those checks to one or both of her personal credit card accounts at Capital  
16 One.

17 6. The scheme to defraud also involved MOBLEY issuing Automated Clearing House  
18 (“ACH”) electronic payments from the Victim Company’s bank account at Umpqua to Capital One.  
19 However, instead of having those ACH payments applied to the Victim Company’s business credit card  
20 account, MOBLEY sent those payments to her personal credit card accounts at Capital One.

21 7. The scheme to defraud also included MOBLEY issuing ACH electronic payments from  
22 the Victim Company’s bank account at Umpqua to an additional credit card company, Credit One Bank.  
23 The Victim Company had no credit cards through Credit One Bank. MOBLEY had a credit card  
24 account at Credit One Bank, and she used the ACH payments from the Victim Company’s bank account  
25 at Umpqua to make payments to that credit card account.

26 8. The scheme to defraud also included MOBLEY’s use of the Victim Company’s business  
27 credit card at Capital One for personal expenses. These included cash advances at casinos, airfare and  
28 hotel expenses for personal travel, and other non-business expenses that were not authorized by the

1 Victim Company.

2 9. The scheme to defraud also involved MOBLEY issuing checks to herself from the Victim  
3 Company’s bank account at Umpqua. The Victim Company had several blank, pre-signed checks in its  
4 office to pay for unexpected expenses in the absence of the Victim Company’s owners. MOBLEY took  
5 blank checks and issued them to herself. These checks MOBLEY issued were unauthorized by the  
6 Victim Company and were unknown to the Victim Company’s owners.

7 10. The scheme to defraud also involved MOBLEY falsely adding vacation time to herself in  
8 the Victim Company’s payroll system. MOBLEY directed another employee of the Victim Company to  
9 cash out the value of some of that vacation time and issue payment for it to MOBLEY.

10 11. The scheme to defraud also included MOBLEY issuing payroll checks to herself.  
11 MOBLEY caused payroll checks to be issued to her for hours that exceeded her regular hours as well as  
12 duplicate payroll checks and checks that were unrelated to her regular payroll.

13 12. The scheme to defraud also included MOBLEY issuing bonus payments to herself that  
14 exceeded bonus payments authorized by the owners of the Victim Company.

15 COUNTS ONE THROUGH THREE: (18 U.S.C. § 1341– Mail Fraud)

16 13. The factual allegations in Paragraphs 1 through 12 of this Indictment are re-alleged and  
17 incorporated herein as if set forth in full.

18 14. Beginning no later than in or about January 2022, and continuing through in or about July  
19 2023, in the Northern District of California, and elsewhere, the defendant,

20 CHRISTINA ANN MOBLEY,

21 with the intent to defraud, devised and willfully participated in, with knowledge of its fraudulent nature,  
22 the above-described scheme and artifice to defraud and obtain money by materially false and fraudulent  
23 pretenses, representations, and promises.

24 The Scheme and Artifice to Defraud

25 15. In furtherance of the scheme and artifice to defraud, MOBLEY used a variety of means  
26 and methods, including the following:

27 16. As part of the scheme to defraud, MOBLEY obtained checks from the Victim Company’s  
28 account at Umpqua, Umpqua account x9019. MOBLEY filled out the payee line of those checks to

1 Capital One. MOBLEY directed Capital One to apply funds from those checks to MOBLEY’s personal  
 2 credit cards at Capital One, Capital One accounts x2811 and x6943.

3 17. As part of the scheme to defraud, between in or about January 2022 and continuing  
 4 through in or about July 2023, MOBLEY caused at least 15 checks totaling approximately \$67,100 to be  
 5 issued from the Victim Company’s account at Umpqua, sent through the mail, and applied to her  
 6 personal credit card accounts held at Capital One.

7 18. MOBLEY issued the checks drawn on the Victim Company’s account knowing that the  
 8 payments were not authorized by the company or its owners and that they exceeded the amounts she was  
 9 legitimately owed by the company for her salary and expenses.

10 Execution of the Scheme

11 19. On or about the dates set forth in the separate counts below, in the Northern District of  
 12 California and elsewhere, the defendant,

13 CHRISTINA ANN MOBLEY,

14 for the purpose of executing the above scheme and artifice to defraud, and attempting to do so, did  
 15 knowingly place or caused to be placed in an authorized depository for mail matter, to be sent and  
 16 delivered by the United States Postal Service, according to the directions thereon, an envelope  
 17 containing mail matter, that is, the checks listed below, each of which represents a separate count of the  
 18 Indictment:

COUNT	DATE	TRANSACTION	AMOUNT
ONE	11/14/2022	Check 64673 for \$5,475.00 from Victim Company’s Umpqua account mailed to MOBLEY’s credit card account at Capital One.  MOBLEY directed payment of \$3,200 to Capital One account x2811 and \$2,275 to Capital One account x6943	\$5,475.00
TWO	4/20/2023	Check 66864 for \$5,662.46 from Victim Company’s Umpqua account mailed to MOBLEY’s credit card account at Capital One.  MOBLEY directed payment of \$3,541.11 to Capital One account x2811 and \$2,121.35 to Capital One account x6943	\$5,662.46

COUNT	DATE	TRANSACTION	AMOUNT
THREE	7/27/2023	Check 1884 for \$4,727.03 from the Victim Company’s account mailed to MOBLEY’s credit card account at Capital One.  MOBLEY directed payment of \$2,333.51 to Capital One account x2811 and \$2,393.52 to Capital One account x6943	\$4,727.03

Each in violation of Title 18, United States Code, Section 1341.

COUNTS THREE THROUGH TEN: (18 U.S.C. § 1343 – Wire Fraud)

20. The factual allegations in Paragraphs 1 through 19 of this Indictment are re-alleged and incorporated herein as if set forth in full.

21. Beginning no later than on or about August 9, 2022, and continuing through on or about November 6, 2024, in the Northern District of California, and elsewhere, the defendant,

CHRISTINA ANN MOBLEY,

with the intent to defraud, devised and willfully participated in, with knowledge of its fraudulent nature, the above-described scheme and artifice to defraud and obtain money by materially false and fraudulent pretenses, representations, and promises.

The Scheme and Artifice to Defraud

22. In furtherance of the scheme and artifice to defraud, MOBLEY used a variety of means and methods, including the following:

23. As part of the scheme to defraud, MOBLEY directed Victim Company’s account at Umpqua, Umpqua account x9019, to issue Automated Clearing House (“ACH”) electronic payments to Capital One. However, instead of having those ACH payments applied to the Victim Company’s business credit card account, MOBLEY sent those payments to one her personal credit card accounts, Capital One accounts x2811 and x6943.

24. As part of the scheme to defraud, between as early as August 2022 and continuing through November 2024, MOBLEY issued approximately 107 ACH payments totaling approximately \$299,700 from the Victim Company’s account at Umpqua to her personal credit card accounts at Capital One.

25. MOBLEY caused the ACH payments to be made from the Victim Company’s Umpqua

1 account knowing that the payments were not authorized by the company or its owners and that they  
 2 exceeded the amounts she was legitimately owed by the company for her salary and expenses.

3 Execution of the Scheme

4 26. On or about the dates set forth in the separate counts below, in the Northern District of  
 5 California and elsewhere, the defendant,

6 CHRISTINA ANN MOBLEY,

7 for the purpose of executing the scheme and artifice referred to above, and attempting to do so, did  
 8 knowingly transmit and cause to be transmitted in interstate and foreign commerce, by means of a wire  
 9 communication, certain writings, signs, signals, pictures, and sounds; specifically, Automated Clearing  
 10 House (“ACH”) electronic payments from Umpqua Bank to Capital One, which transmitted to and from  
 11 interstate commerce and which took the form of the following financial transactions, among others, on  
 12 or about the following dates, each transaction constituting a separate Count of this Indictment:

COUNT	DATE	TRANSACTION	AMOUNT
FOUR	8/9/2022	\$3,344.86 ACH payment from the Victim Company’s Umpqua Bank account to MOBLEY’s Capital One account x2811	\$3,344.86
FIVE	11/1/2023	\$2,645.38 ACH payment from the Victim Company’s Umpqua Bank account to MOBLEY’s Capital One account x6943	\$2,645.38
SIX	11/6/2023	\$3,301.89 ACH payment from the Victim Company’s Umpqua Bank account to MOBLEY’s Capital One account x2811	\$3,301.89
SEVEN	11/10/2023	\$2,754.48 ACH payment from the Victim Company’s Umpqua Bank account to MOBLEY’s Capital One account x6943	\$2,754.48
EIGHT	12/28/2023	\$2,011.84 ACH payment from the Victim Company’s Umpqua Bank account to MOBLEY’s Capital One account x6943	\$2,011.84
NINE	1/22/2024	\$3,548.71 ACH payment from the Victim Company’s Umpqua Bank account to MOBLEY’s Capital One account x2811	\$3,548.71
TEN	11/1/2024	\$3,413.68 ACH payment from the Victim Company’s Umpqua Bank account to MOBLEY’s Capital One account x2811	\$3,413.68

28 Each in violation of Title 18, United States Code, Section 1343.

1 FORFEITURE ALLEGATION: (18 U.S.C. § 981(a)(1)(C) and 982; 28 U.S.C. § 2461(c))

2 The allegations contained in this Indictment are re-alleged and incorporated by reference for the  
3 purpose of alleging forfeiture pursuant to Title 18, United States Code, Section 981(a)(1)(C) and Title  
4 28, United States Code, Section 2461(c).

5 Upon conviction for any of the offenses set forth in this Indictment, the defendant,

6 CHRISTINA ANN MOBLEY,

7 shall forfeit to the United States, pursuant to Title 18, United States Code, Section 981(a)(1)(C) and  
8 Title 28, United States Code, Section 2461(c), all property, real or personal, constituting, or derived  
9 from proceeds the defendant obtained directly and indirectly, as the result of those violations.

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

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

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

19 All pursuant to Title 18, United States Code, Section 981(a)(1)(C), Title 28, United States Code,  
20 Section 2461(c), and Federal Rule of Criminal Procedure 32.2.

21 DATED: February 05, 2025

A TRUE BILL.

22  
23 \_\_\_\_\_  
24 /s/ \_\_\_\_\_  
FOREPERSON

25 ISMAIL J. RAMSEY  
26 United States Attorney

27 /s/ Kevin J. Barry

28 \_\_\_\_\_  
KEVIN J. BARRY  
Assistant United States Attorney



Feb 05 2025

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

**UNITED STATES 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:**

**CASE NUMBER:** CR25-00030 CRB

USA v. CHRISTINA ANN MOBLEY

CR

**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):** Kevin J. Barry

**Date Submitted:** February 5, 2025

**Comments:**

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

BY:  COMPLAINT  INFORMATION  INDICTMENT  
 SUPERSEDING

**OFFENSE CHARGED**

18 U.S.C. § 1341 – Mail Fraud  
18 U.S.C. § 1343 – Wire Fraud

- Petty
- Minor
- Misdemeanor
- Felony

**PENALTY:** • 20 years' imprisonment  
• \$250,000 fine, or twice the amount of gain or loss  
• 3 years' supervised release  
• Forfeiture  
• Restitution; • \$100 special assessment

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

NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION

**DEFENDANT - U.S.**

CHRISTINA ANN MOBLEY

DISTRICT COURT NUMBER  
CR25-00030 CRB

**PROCEEDING**

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

FBI

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 ISMAIL J. RAMSEY

U.S. Attorney  Other U.S. Agency

Name of Assistant U.S. Attorney (if assigned)

Kevin J. Barry

**DEFENDANT**

**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 Fugitive
  - 3)  Is on Bail or Release from (show District)

**IS IN CUSTODY**

- 4)  On this charge
  - 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\*  WARRANT

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

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: