

AO 257 (Rev. 8/78)

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

BY: COMPLAINT INFORMATION INDICTMENT
 SUPERSEDING

OFFENSE CHARGED

- Petty
 - Minor
 - Misdemeanor
 - Felony
- 18 U.S.C. § 1349 - Conspiracy to Commit Bank Fraud
 18 U.S.C. § 1344(1), (2) - Bank Fraud
 18 U.S.C. § 510(b) - Receipt of U.S. Treasury Check with Forged Endorsement or Signature
 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

- PENALTY:**
- Maximum 30 years imprisonment
 - Maximum \$1,000,000 fine
 - Maximum 5 years supervised release
 - \$100 special assessment
 - Forfeiture
 - Restitution

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

NORTHERN DISTRICT OF CALIFORNIA
 OAKLAND DIVISION

DEFENDANT - U.S.

FRANCHESCA CALAGUI

DISTRICT COURT NUMBER

CR 25 0025 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.

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) Cynthia Johnson

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)

FILED

JAN 30 2025

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

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: 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:

AO 257 (Rev. 6/78)

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
OAKLAND DIVISION

OFFENSE CHARGED

- 18 U.S.C. § 1349 - Conspiracy to Commit Bank Fraud Petty
- 18 U.S.C. § 1344(1), (2) - Bank Fraud Minor
- 18 U.S.C. § 510(b) - Receipt of U.S. Treasury Check with Forged Endorsement or Signature Misdemeanor
- 18 U.S.C. § 2 - Aiding and Abetting Felony
- 18 U.S.C. § 981(a)(1)(C) and 28 U.S.C. § 2461(c) - Forfeiture Allegation Felony

PENALTY: • Maximum 30 years imprisonment
• Maximum \$1,000,000 fine
• Maximum 5 years supervised release
• \$100 special assessment
• Forfeiture
• Restitution

DEFENDANT - U.S.

DONDRE GRAY
DISTRICT COURT NUMBER
CR 25 0025 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

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 U.S. Attorney Other U.S. Agency

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

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FILED
JAN 30 2025

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

IS IN CUSTODY

4) On this charge

5) On another conviction } Federal State

6) Awaiting trial on other charges
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DATE OF ARREST Month/Day/Year

Or... if Arresting Agency & Warrant were not

DATE TRANSFERRED TO U.S. CUSTODY Month/Day/Year

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Defendant Address:

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Date/Time: _____ Before Judge: _____

Comments:

United States District Court

FOR THE
NORTHERN DISTRICT OF CALIFORNIA

VENUE: OAKLAND

UNITED STATES OF AMERICA,
v.

FRANCESCA CALAGUI and
DONDRE GRAY,

FILED
JAN 30 2025
CLERK, U.S. DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

CR 25 0025

DEFENDANT(S).

YGR

INDICTMENT

118 U.S.C. § 1349 - Conspiracy to Commit Bank Fraud
18 U.S.C. § 1344(1), (2) - Bank Fraud
18 U.S.C. § 510(b) – Receipt of U.S. Treasury Check with Forged Endorsement or
Signature
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.

/s/ Foreperson of the Grand Jury

Foreman

Filed in open court this 30th day of

January 2025

Karen L. Hom
Kandis Westmore
Clerk
1/30/2025

Bail, \$ Arrest Warrant

Hon. Kandis A. Westmore, U.S. Magistrate Judge



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

FILED
JAN 30 2025
CLERK, U.S. DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

8 UNITED STATES DISTRICT COURT
9 NORTHERN DISTRICT OF CALIFORNIA

YGR

10 OAKLAND DIVISION

CR 25 0025

11 UNITED STATES OF AMERICA,

12 Plaintiff,

13 v.

14 FRANCESCA CALAGUI and
DONDRE GRAY,

15 Defendants.

) CASE NO.

) VIOLATIONS:

) 18 U.S.C. § 1349 - Conspiracy to Commit Bank Fraud

) 18 U.S.C. § 1344(1), (2) - Bank Fraud

) 18 U.S.C. § 510(b) – Receipt of U.S. Treasury Check
with Forged Endorsement or Signature

) 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 Introductory Allegations

22 At all times relevant to this Indictment:

23 1. Defendant FRANCESCA CALAGUI resided in the in the Northern District of
24 California and was a Part-Time Associate Banker at JP Morgan Chase Bank (“Chase Bank”) in the
25 Northern District of California on or about May 12, 2022 through on or about March 30, 2023.

26 2. Defendant DONDRE GRAY resided in the in the Northern District of California on or
27 about May 12, 2022 through on or about March 30, 2023.
28

INDICTMENT

1 3. JP Morgan Chase Bank (“Chase Bank”) is a financial institution, as that term is defined
2 in Title 18 U.S.C. § 20 and 31 U.S.C. § 5312(a)(2), the deposits of which were insured by the Federal
3 Deposit Insurance Corporation (“FDIC”).

4 Object of the Conspiracy and Scheme to Commit Bank Fraud

5 4. On or about May 12, 2022, through on or about March 30, 2023, in the Northern District
6 of California, the defendants unlawfully, willfully, and knowingly devised a scheme and artifice to
7 commit bank fraud by means of materially false and fraudulent pretenses, representations, promises, and
8 omissions as more particularly set forth herein.

9 5. CALAGUI and GRAY conspired together to obtain stolen U.S. Treasury checks, to
10 recruit others to falsely make or forge endorsements or signatures on those stolen U.S. Treasury checks
11 and give them to Chase Bank teller CALAGUI to cash and obtain money for the defendants own
12 personal enrichment.

13 6. It was part of the scheme that CALAGUI and GRAY exploited CALAGUI’s position and
14 knowledge as a Chase Bank teller to subvert the bank’s check cashing policy to knowingly cash forged
15 U.S. Treasury checks for non-Chase Bank customers.

16 Manner and Means of the Conspiracy

17 7. CALAGUI, GRAY, and others unknown to the Grand Jury, used various means and
18 methods to accomplish this scheme, including, but not limited to:

- 19 a. Coordinating via text message, phone, and other means to discuss the details and
20 execution of the scheme.
- 21 b. Obtaining stolen checks of individuals residing in, among other places, the Southern
22 and Central Districts of California, who were not previously known to have lived in
23 the Northern District of California or previously known to the defendants.
- 24 c. Recruiting and paying unknown coconspirators a fee to fraudulently sign and cash the
25 stolen U.S. Treasury checks at Chase Bank’s Deer Valley Branch location and with
26 bank teller CALAGUI.
- 27 d. CALAGUI knowingly cashing U.S. Treasury checks for non-Chase Bank customers
28 that did not comply with Chase Bank’s check cashing policy, including but not

1 limited to cashing U.S. Treasury checks for non-Chase Bank customers, not verifying
2 valid forms of identification, signatures, or required Chase accounts with sufficient
3 funds.

- 4 e. Defendants keeping or depositing the proceeds in their respective personal Chase
5 bank accounts for their own personal enrichment.

6 Overt Acts in Furtherance of the Conspiracy

7 8. In furtherance of the conspiracy and to affect the objects of the conspiracy, the following
8 overt acts, among others, were committed in the Northern District of California:

- 9 a. On or about October 4, 2022, GRAY and CALAGUI had a conversation via text
10 messaging that details the ongoing conspiracy. Initially in the conversation, GRAY
11 states to CALAGUI, "I definitely don't wanna scam with chase since you work
12 there." CALAGUI responds "I do not care if u scam us lmao". GRAY then elaborates
13 on how he conducts the Treasury Check conspiracy scheme with runners. An illegal
14 check runner is a person who gets paid to enter a bank with a fraudulent check, cash
15 it, and return the proceeds to the person who employed the runner. GRAY
16 specifically states that he uses female runners because he only needs to pay them a
17 smaller cut, while male runners demand a higher portion of the proceeds.
- 18 b. On or about October 17, 2022, in violation of Chase Bank check cashing policy for
19 non-Chase Bank customers, CALAGUI knowingly cashed two U.S. Treasury Checks
20 written to two different payees but negotiated by the same customer. Additionally, the
21 identification numbers that CALAGUI input did not match the payees listed.
- 22 c. On or about May 12, 2022, through on or about March 30, 2023, as a Chase Bank
23 teller, CALAGUI accepted and cashed at least 339 forged checks totaling
24 approximately \$857,000.
- 25 d. GRAY opens two Chase bank accounts during the scheme, one on June 12, 2022
26 (account ending in 1612), and another on September 18, 2022 (account ending in
27 9119).
- 28 e. During the conspiracy, on or about May 12, 2022, through on or about March 30,

2023, the defendants deposited approximately \$71,000 of cash deposits from the scheme to GRAY’s Chase Bank accounts ending in 1612 and 9119.

- f. On October 13, 2022, in a text message between GRAY and CALAGUI, GRAY tells CALAGUI, “My bank accounts show I bring in so much more than I make at footlocker.”
- g. During the conspiracy, CALAGUI deposited approximately \$15,000 of cash deposits from the scheme into her Chase Bank account ending in 6149 (opened in 2020).
- h. On March 15, 2023 in text messages that were sent two weeks before CALAGUI went on maternity leave on March 30, 2023, CALAGUI tells GRAY, “Yes the more money the more comfortable I can feel. That’s why I gotta come in and make as much as I can.”
- i. In the last two weeks of the scheme, March 15 – 30, 2023, just before going on maternity leave, CALAGUI cashed more than \$190,000 in Treasury checks, more than 25% of the estimated total obtained from the approximately 10-month scheme.

COUNT ONE: (18 U.S.C. § 1349 – Conspiracy to Commit Bank Fraud)

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

10. On or about May 12, 2022, through on or about March 30, 2023, in the Northern District of California, the defendants,

FRANCHESCA CALAGUI and
DONDRE GRAY

and others unknown to the Grand Jury, did knowingly conspire to devise and intend to devise a scheme and artifice to defraud Chase Bank, a financial institution, as to a material matter, and to obtain money and property under the custody and control of Chase Bank by means of materially false and fraudulent pretenses, representations, and promises, and by the concealment of material facts, , in violation of Title 18 U.S.C. §§ 1344(1),(2) and 2.

All in violation of Title 18 U.S.C. § 1349.

COUNTS TWO THROUGH SIX: (18 U.S.C. §§ 1344(1), (2) - Bank Fraud; and 18 U.S.C. § 2 - Aiding and Abetting)

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

3 12. On or about May 12, 2022, through on or about March 30, 2023, in the Northern District
 4 of California, the defendants,

5
 6 FRANCHESCA CALAGUI and
 DONDRE GRAY

7 and others unknown to the Grand Jury, aiding and abetting one another, did knowingly and with the
 8 intent to defraud, devise and execute, and attempt to execute, a material scheme and artifice to defraud
 9 Chase Bank as to a material matter, and to obtain money and property under the custody and control of
 10 Chase Bank by means of materially false and fraudulent pretenses, representations, and promises and by
 11 the concealment of material facts.

12 Execution of the Scheme

13 13. On or about the dates set forth in the counts below, in the Northern District of California,
 14 for the purpose of executing the scheme and artifice referred to above, and attempting to do so, the
 15 defendants conducted or caused to be conducted the following financial transactions, among others:

16

COUNT	Check Type	Issue Date	Amount	Transacted Date	Transacted Amount
TWO	US Treasury	10/19/2022	\$4,872.00	10/26/2022	\$ 4,872.00
THREE	US Treasury	11/04/2022	\$4,912.10	12/12/2022	\$ 4,912.10
FOUR	US Treasury	11/04/2022	\$4,982.81	12/13/2022	\$ 4,982.81
FIVE	US Treasury	03/17/2023	\$4,893.00	03/29/2023	\$ 4,893.00
SIX	US Treasury	03/17/2023	\$4,741.00	03/29/2023	\$ 4,741.00

17
18
19
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23 All in violation of Title 18 U.S.C. §§ 1344(1), (2) and 2.

24 COUNTS SEVEN THROUGH ELEVEN: (18 U.S.C. § 510(b) – Receipt of U.S. Treasury Check with
 25 Forged Endorsement or Signature)

26 14. Paragraphs 1 through 8 of this Indictment are re-alleged and incorporated as if fully set
 27 forth here.

1 15. On or about May 12, 2022, through on or about March 30, 2023, in the Northern District
2 of California, defendant,

3 FRANCHESCA CALAGUI

4 did unlawfully and with knowledge that the U.S. Treasury check was stolen or bore a falsely made or
5 forged endorsement or signature, bought, sold, exchanged, received, delivered, retained, or concealed
6 any such Treasury check of the United States, as described below for each count:

COUNT	Check Type	Issue Date	Amount	Transacted Date	Transacted Amount
7 SEVEN	US Treasury	10/19/2022	\$4,872.00	10/26/2022	\$ 4,872.00
8 EIGHT	US Treasury	11/04/2022	\$4,912.10	12/12/2022	\$ 4,912.10
9 NINE	US Treasury	11/04/2022	\$4,982.81	12/13/2022	\$ 4,982.81
10 TEN	US Treasury	03/17/2023	\$4,893.00	03/29/2023	\$ 4,893.00
11 ELEVEN	US Treasury	03/17/2023	\$4,741.00	03/29/2023	\$ 4,741.00

12 All in violation of Title 18 U.S.C. §§ 510(b)

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

14 16. Paragraphs 1 through 15 of this Indictment, including all subparts, are re-alleged and
15 incorporated as if fully set forth here for the purpose of alleging forfeiture pursuant to Title 18, United
16 States Code, Section 981(a)(1)(C) and Title 28, United States Code, Section 2461(c).

17 17. Upon conviction for any of the offenses set forth in this Indictment, the defendants,

18 FRANCHESCA CALAGUI and
19 DONDRE GRAY

20 shall forfeit to the United States, pursuant to Title 18, United States Code, Section 981(a)(1)(C) and
21 Title 28, United States Code, Section 2461(c), all property, real or personal, constituting, or derived
22 from proceeds the defendant obtained directly and indirectly, as the result of those violations, including
23 but not limited to money and property taken by the defendants, and/or a forfeiture money judgment.
24

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

26 a. cannot be located upon exercise of due diligence;
27
28

- 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
- e. 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).

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

DATED: January 30, 2025

A TRUE BILL.



FOREPERSON

ISMAIL J. RAMSEY
United States Attorney

/s/ Cynthia Johnson
CYNTHIA JOHNSON
Special Assistant United States Attorney



FILED

JAN 30 2025

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

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:

USA v. FRANCESCA CALAGUI and DONDRE GRAY

CASE NUMBER:

CR

CR 25 0025

Is This Case Under Seal?

Yes No

Total Number of Defendants:

1 2-7 8 or more

YGR

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): Cynthia Johnson

Date Submitted: 1/30/2025

Comments: