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United States Attorney

**FILED**

Aug 14 2025

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

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN JOSE DIVISION

UNITED STATES OF AMERICA,	)	CASE NO. <b>CR 25-00252-EKL (NC)</b>
	)	
Plaintiff,	)	VIOLATIONS:
	)	18 U.S.C. § 1343 – Wire Fraud;
v.	)	18 U.S.C. § 1957 – Money Laundering;
	)	18 U.S.C. § 981(a)(1)(C) and 28 U.S.C. § 2461(c), 18
MONIQUE MARIE DODSON,	)	U.S.C. §§ 982(a)(1) – Forfeiture Allegation
	)	
Defendant.	)	

I N F O R M A T I O N

The United States Attorney charges:

Introductory Allegations

At all times relevant to this Information:

1. Defendant Monique Marie Dodson (“DODSON”) resided in the Northern District of California. DODSON was the controller for Company A from in or about 2019 to in or about December 2023.

2. DODSON maintained several personal bank accounts, including Wells Fargo accounts ending 8568 (DA 8568) and 1681 (DA 1681). DODSON was the sole signatory for DA 8568 and 1681. DODSON maintained a Bank of America account ending in 1967 (DA 1967). DODSON maintained a U.S. Bank account ending in 6223 (DA 6223).

1 DODSON and her partner were listed on bank statements for DA 1967 and DA 6223. DODSON  
2 also maintained a U.S. Bank account ending in 7981 (DA 7981). DODSON is the only person listed on  
3 the account statements and application for DA 7981.

4 3. Company A was a private civil contracting construction company organized under the  
5 laws of the State of California and headquartered in Salinas, California. Company A built highways and  
6 other concrete structures, installed septic systems, handled industrial waste, and operated rock quarries.

7 4. Company A maintained a bank account at Santa Cruz County Bank (SCCB) ending in  
8 0582 (SCCB 0582).

9 5. SCC Bank processed all electronic account transactions, including wire transactions,  
10 through computer servers located in Madison, Wisconsin.

11 The Scheme to Defraud

12 6. Beginning as early as on or about October 1, 2021, and continuing to on or about  
13 November 10, 2023, DODSON conducted approximately 136 unauthorized wire transfers from SCCB  
14 0582 to her personal accounts (DA 8568, DA 1681, DA 1967, and DA 7981) totaling approximately  
15 \$8,579,647.48. These transfers are detailed below and were characterized by DODSON as payment for  
16 materials for Company A, but in reality, DODSON was conducting monetary transfers from Company  
17 A's bank account to DODSON's personal account for her personal use and enrichment. This was not  
18 authorized by Company A.

19 7. On or about October 1, 2021 and October 19, 2021, DODSON conducted two  
20 unauthorized wire transfers totaling approximately \$50,000 from SCCB 0582 to her personal bank  
21 accounts.

22 8. From on or about February 4, 2022, to on or about December 30, 2022, DODSON  
23 conducted 42 unauthorized wire transfers from SCCB 0582 to her personal bank accounts totaling  
24 approximately \$2,068,989.89.

25 9. From on or about January 3, 2023 to November 10, 2023, DODSON conducted 92  
26 unauthorized wire transfers from SCCB 0582 to her personal bank accounts totaling approximately  
27 \$6,460,657.59.

10. In furtherance of her scheme and artifice to defraud, DODSON used a variety of means and methods, including false and fraudulent representations, promises, and omissions and concealment of material facts, as described below. DODSON did so for the purpose of concealing the unauthorized transfers to avoid detection and facilitate future transfers.

11. On more than one occasion, DODSON intercepted paper bank statements mailed by SCC Bank to Company A. These paper bank statements documented the unauthorized wire transfers DODSON made from SCCB 0582 to DODSON's personal accounts. The bank statements listed DODSON's name in the wire transfer descriptions. After intercepting the paper bank statements, DODSON destroyed the paper bank statements for the purpose of concealing her conduct.

12. On more than one occasion, DODSON downloaded SCC Bank statements via the internet and modified the bank statements by removing her name from wire transfer descriptions so that Company A would be unaware that DODSON was the true beneficiary of the wire transfers. DODSON saved these bank statements in Company A's records.

13. DODSON further concealed the unauthorized wire transfers by manipulating Company A's accounting journal. DODSON reconciled the unauthorized transferred monies by falsely listing them in Company A's expense accounts in the accounting journal. These actions gave the appearance of legitimate spending by Company A, when in truth and in fact, the entries were false, and no such expenditures were made by Company A.

COUNTS ONE THROUGH SIX: (18 U.S.C. § 1343 – Wire Fraud)

14. Paragraphs 1 through 13 of this Information are re-alleged and incorporated as if fully set forth here.

15. Beginning as early as on or about October 1, 2021, and continuing through on or about November 10, 2023 in the Northern District of California and elsewhere, the defendant,

MONIQUE MARIE DODSON,  
knowingly and with the intent to defraud participated in, devised, and intended to devise a scheme and artifice to defraud as to a material matter, and to obtain money and property by means of materially false and fraudulent pretenses, representations, and promises, and by means of omission and concealment of material facts.

16. On or about the dates set forth below, in the Northern District of California and elsewhere, for the purpose of executing the aforementioned scheme and artifice to defraud and attempting to do so, the defendant,

MONIQUE MARIE DODSON,

did knowingly transmit and cause to be transmitted in interstate and foreign commerce, by means of a wire communication, certain writings, signs, signals, pictures, and sounds, specifically identified below:

Count	Approx. Date	Description of Wire
1	October 1, 2021	Interstate wire transfer of \$25,000 from DCCA 0582 to DA 8568.
2	October 19, 2021	Interstate wire transfer of \$25,000 from DCCA 0582 to DA 1681.
3	November 28, 2022	Interstate wire transfer of \$97,067.74 from DCCA 0582 to DA 1681.
4	December 28, 2022	Interstate wire transfer of \$97,067.74 from DCCA 0582 to DA 1681.
5	August 14, 2023	Interstate wire transfer of \$80,812.50 from DCCA 0582 to DA 1967.
6	August 18, 2023	Interstate wire transfer of \$86,146.13 from DCCA 0582 to DA 7981.

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

**COUNT SEVEN:** (18 U.S.C. § 1957 – Money Laundering)

17. Paragraphs 1 through 16 of this Information are re-alleged and incorporated as if fully set forth here.

18. On or about September 12, 2023, in the Northern District of California, and elsewhere, the defendant,

MONIQUE MARIE DODSON,

did knowingly engage in a monetary transaction by, through, and to a financial institution, in affecting interstate and foreign commerce, in criminally derived property of a value greater than \$10,000, that is, the wiring of \$15,553.19 to purchase a 2023 Suzuki GSXR motorcycle, such property having been derived from a specified unlawful activity, that is, Wire Fraud.

1 All in violation of Title 18, United States Code, Section 1957.

2 FORFEITURE ALLEGATION: (18 U.S.C. § 981(a)(1)(C) and 28 U.S.C. § 2461(c), 18 U.S.C.  
3 §§ 982(a)(1), (2))

4 19. The allegations contained in this Information are re-alleged and incorporated by reference  
5 for the purpose of alleging forfeiture pursuant to Title 18, United States Code, Section 981(a)(1)(C) and  
6 Title 28, United States Code, Section 2461(c), and Title 18, United States Code, Sections 982(a)(1), (2).

7 20. Upon conviction for Counts One through Six of this Information, the defendant,  
8  
9 MONIQUE MARIE DODSON,  
10 shall forfeit to the United States, pursuant to Title 18, United States Code, Section 981(a)(1)(C), and  
11 Title 28, United States Code, Section 2461(c), all property, real or personal, constituting, or derived  
12 from proceeds the defendant obtained directly and indirectly, as the result of those violations, including  
13 but not limited to the following: a sum of money equal to \$8,579,647.48 in United States currency,  
14 which represents the amount of proceeds obtained as a result of the offense charged in Counts One  
15 through Six.

16 21. Upon conviction for Count Seven of this Information, the defendant,  
17  
18 MONIQUE MARIE DODSON,  
19 shall forfeit to the United States, pursuant to Title 18, United States Code, Section 982(a)(1) all property,  
20 real or personal, involved in such offense, and any property traceable to such property, including but not  
21 limited to the following: a sum of money equal to the total value of property involved in the  
22 commission of said offense.

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

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

1 the United States of America shall be entitled to forfeiture of substitute property pursuant to Title 21,  
2 United States Code, Section 853(p), as incorporated by Title 28, United States Code, Section 2461(c).  
3 All pursuant to Title 18, United States Code, Section 981(a)(1)(C), Title 28, United States Code, Section  
4 2461(c), Title 18, United States Code, Sections 982(a)(1), (2), and Federal Rule of Criminal Procedure  
5 32.2.

6 DATED: 8/14/25 \_\_\_\_\_

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7  
8 Neal Hong  
NEAL C. HONG  
9 Assistant United States Attorney