

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

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

OFFENSE CHARGED

26 U.S.C. § 7201 - Tax Evasion
18 U.S.C. § 1341 - Mail Fraud

- [] Petty
[] Minor
[] Misdemeanor
[X] Felony

PENALTY: • Imprisonment: 20 years
• Fine: \$250,000
• Supervised Release: 3 years
• Special Assessment: \$100
• Forfeiture: Of stolen money or property
• Restitution: Mandatory

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

NORTHERN DISTRICT OF CALIFORNIA
OAKLAND DIVISION

FILED

Feb 26 2025

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

DEFENDANT - U.S.

HOWARD SOLOMON

DISTRICT COURT NUMBER

4:25-cr-00054-YGR

PROCEEDING

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

IRS- Criminal Investigations

[] 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 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)

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 [X] NO PROCESS* [] WARRANT

Bail Amount: _____

If Summons, complete following:

[] Arraignment [] Initial Appearance

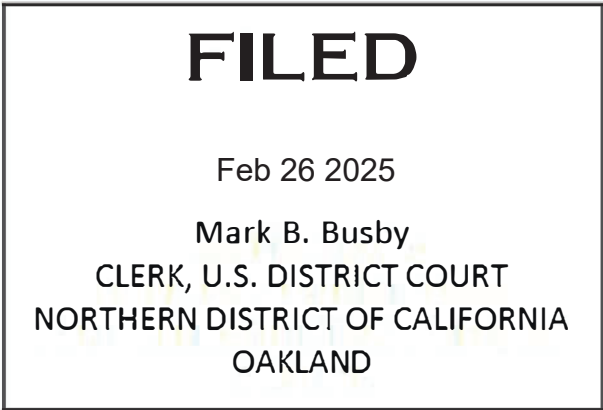
* Where defendant previously apprehended on complaint, no new summons or warrant needed, since Magistrate has scheduled arraignment

Defendant Address: _____

Date/Time: _____ Before Judge: _____

Comments: Defendant is represented by Randy Sue Pollack, who has agreed to accept service of the Information and have

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



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

10 UNITED STATES OF AMERICA,)	CASE NO. 4:25-cr-00054-YGR
11 Plaintiff,)	<u>VIOLATIONS:</u>
12 v.)	18 U.S.C. § 1341 – Mail Fraud
13 HOWARD SOLOMON,)	26 U.S.C. § 7201 – Tax Evasion
14 Defendant.)	OAKLAND VENUE
15)	
16)	

17 INFORMATION

18 The United States Attorney charges:

19 Introductory Allegations

20 At all times relevant to this Information:

21 1. Defendant Howard SOLOMON (“SOLOMON”) resided in the Northern District of
22 California.

23 2. The East Oakland Boxing Association (“EOBA”) was a non-profit organization
24 providing internship, mentoring, programming and services, including boxing lessons and coaching, to
25 children in East Oakland. According to its website, EOBA was founded in 1987 and seeks to create a
26 secure and enriching environment that inspires Oakland’s youth to thrive in education, health and
27 wellness, and community engagement. According to its website, EOBA has provided 18,900 hours of
28 academic programming, 9,450 hours of enrichment programming and 7,126 hour of youth boxing

1 coaching in the past year, including serving 150 children daily in summer programming.

2 3. SOLOMON was employed as the Executive Director of the EOBA from at least 2017
3 until approximately April 2021. SOLOMON’s duties as Executive Director at EOBA included:
4 managing daily operations, soliciting contributions/fundraising, program management, oversight of the
5 organization’s budget and finances, staff management, community outreach, and much more.
6 SOLOMON was a signatory to EOBA bank accounts during his tenure at EOBA and had unfettered
7 access to EOBA’s operating bank accounts and debit cards directly linked to those accounts. As the
8 Executive Director of the EOBA and personal responsible for its finances and bank accounts,
9 SOLOMON owed fiduciary duties to EOBA.

10 Scheme to Defraud

11 4. Beginning on a date unknown, but by some point in 2017 and continuing until
12 approximately April 2021, in the Northern District of California, and elsewhere, SOLOMON knowingly
13 devised, intended to devise, and carried out a scheme and artifice to obtain money and property by
14 means of materially false and fraudulent pretenses, representations, and promises, and by omission and
15 concealment of material facts.

16 5. During his tenure as the Executive Director of the EOBA, SOLOMON engaged in a
17 scheme to embezzle money and property from EOBA. In furtherance of his scheme, SOLOMON made
18 numerous false statements and concealed his scheme from EOBA by engaging in the acts listed below:

19 a. transferring EOBA funds from known EOBA bank accounts he was provided
20 access to at the outset of his tenure as the Executive Director of the EOBA into various other
21 accounts he alone had access to, and without the knowledge of members of the EOBA Board of
22 Directors;

23 b. embezzling money from EOBA accounts to make numerous purchases of
24 personal items from Amazon, including purchasing over \$100,000 worth of goods via his
25 personal Amazon account using debit cards linked to EOBA accounts;

26 c. falsely claiming that Amazon purchases for personal use were different items for
27 EOBA, often describing or categorizing such purchases with generic descriptions such as
28 “program supplies,” “summer program supplies,” “direct program expenses,” or “cleaning

1 supplies;”

2 d. embezzling a \$50,000 donation to EOBA made in connection with a December
3 2019 appearance by Stephen Curry and Ayesha Curry on the Ellen DeGeneres Show for a
4 segment known as “Ellen’s Greatest Night of Giveaways,” in which the Currys delivered various
5 gifts to EOBA and a \$50,000 donation check was made out to EOBA, which SOLOMON
6 deposited into a personal account without the knowledge of EOBA staff or board members;

7 e. embezzling money from EOBA accounts to pay for a vacation rental property for
8 personal use, and claiming that the expenses associated with the vacation rental property were
9 business expenses; and

10 f. embezzling EOBA funds to pay for a Ford Explorer in 2017 that SOLOMON
11 used for personal use, and then trading the Ford Explorer into a car dealer in Dublin, California,
12 in March 2021, which credited SOLOMON \$24,000 towards his purchase of a Cadillac
13 Escalade, which SOLOMON registered in his name and used for personal use.

14 COUNT ONE: (18 U.S.C. § 1341 – Mail Fraud)

15 6. The allegations contained in paragraphs 1 through 5 of this Information are hereby re-
16 alleged and incorporated herein by reference.

17 7. Beginning on an unknown date but no later than in 2017, and continuing through in or
18 about April 2021, in the Northern District of California and elsewhere, the defendant,

19 HOWARD SOLOMON,

20 did knowingly devise and intend to devise a scheme, artifice, and plan to defraud as to a material
21 matter, and to obtain money and property by means of materially false and fraudulent pretenses,
22 representations, and promises, and by omissions and concealment of material facts and, for the
23 purpose of executing such scheme or artifice and attempting to do so, did cause matter to be
24 delivered by the United States Postal Service and private and commercial interstate carriers,
25 including by purchasing a queen size bed and a cooling gel memory foam mattress with EOBA funds
26 for approximately \$1,381.11, including taxes and shipping fees, via the Amazon website on or about
27 August 18, 2020, knowing that the bed and mattress would be shipped to his home in Oakland,
28 California, with the bed and mattress in fact delivered to his home via United Parcel Service on or

1 about August 19, 2020.

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

3 COUNT TWO: (26 U.S.C. § 7201 – Tax Evasion – 2018)

4 8. The allegations contained in paragraphs 1 through 5 of this Information are hereby re-
5 alleged and incorporated herein by reference.

6 9. From in or about January 2018, through in or about January 28, 2019, in the Northern
7 District of California and elsewhere, the defendant,

8 HOWARD SOLOMON,

9 a resident of the Northern District of California, owing more federal income tax than was declared due
10 on his federal income tax returns, and knowing this fact, did willfully and knowingly attempt to evade
11 and defeat income tax due and owing by him to the United States of America, for the calendar year
12 2018, by committing the following affirmative acts, among others:

13 a. preparing and causing to be prepared, and signing and causing to be signed, and
14 filing and causing to be filed with the Internal Revenue Service a false and fraudulent U.S.
15 Individual Income Tax Return, Form 1040, in the name of the defendant, for tax year 2018,
16 which was submitted to the Internal Revenue Service;

17 b. reporting, and causing to be reported that his taxable income for the calendar year
18 2018 was \$0, and that the amount of tax due and owing was \$275, when in fact, as defendant
19 knew, defendant had joint taxable income for the calendar year 2018 that was greater than the
20 amount reported on the tax return, and as a result of such additional taxable income, there was
21 additional tax due and owing to the United States of America; and

22 c. reporting, and causing to be reported that he owned and operated multiple sole
23 proprietorship businesses that had various expenses and losses, expenses and losses that he knew
24 to be false or inflated, and expenses and losses defendant reported or caused to be reported in
25 order to understate income on his U.S. Individual Income Tax Return, Form 1040.

26 All in violation of Title 26, United States Code, Section 7201.

27 COUNT THREE: (26 U.S.C. § 7201 – Tax Evasion – 2019)

28 10. The allegations contained in paragraphs 1 through 5 of this Information are hereby re-

1 alleged and incorporated herein by reference.

2 11. From in or about January 2019, through in or about January 31, 2020, in the Northern
3 District of California and elsewhere, the defendant,

4 HOWARD SOLOMON,

5 a resident of the Northern District of California, owing more federal income tax than was declared due
6 on his federal income tax returns, and knowing this fact, did willfully and knowingly attempt to evade
7 and defeat income tax due and owing by him to the United States of America, for the calendar year
8 2019, by committing the following affirmative acts, among others:

9 a. preparing and causing to be prepared, and signing and causing to be signed, and
10 filing and causing to be filed with the Internal Revenue Service a false and fraudulent U.S.
11 Individual Income Tax Return, Form 1040, in the name of the defendant, for tax year 2019,
12 which was submitted to the Internal Revenue Service;

13 b. reporting, and causing to be reported that his taxable income for the calendar year
14 2019 was \$84,278, and that the amount of tax due and owing was \$11,716, when in fact, as
15 defendant knew, defendant had joint taxable income for the calendar year 2019 that was greater
16 than the amount reported on the tax return, and as a result of such additional taxable income,
17 there was additional tax due and owing to the United States of America; and

18 c. reporting, and causing to be reported that he owned and operated multiple sole
19 proprietorship businesses that had various expenses and losses, expenses and losses that he knew
20 to be false or inflated, and expenses and losses defendant reported or caused to be reported in
21 order to understate income on his U.S. Individual Income Tax Return, Form 1040.

22 All in violation of Title 26, United States Code, Section 7201.

23 COUNT FOUR: (26 U.S.C. § 7201 – Tax Evasion – 2020)

24 12. The allegations contained in paragraphs 1 through 5 of this Information are hereby re-
25 alleged and incorporated herein by reference.

26 13. From in or about January 2020, through in or about February 11, 2021, in the Northern
27 District of California and elsewhere, the defendant,

28 HOWARD SOLOMON,

1 a resident of the Northern District of California, owing more federal income tax than was declared due
2 on his federal income tax returns, and knowing this fact, did willfully and knowingly attempt to evade
3 and defeat income tax due and owing by him to the United States of America, for the calendar year
4 2020, by committing the following affirmative acts, among others:

5 a. preparing and causing to be prepared, and signing and causing to be signed, and
6 filing and causing to be filed with the Internal Revenue Service a false and fraudulent U.S.
7 Individual Income Tax Return, Form 1040, in the name of the defendant, for tax year 2020,
8 which was submitted to the Internal Revenue Service;

9 b. reporting, and causing to be reported that his taxable income for the calendar year
10 2020 was \$84,255, and that the amount of tax due and owing was 8,309, when in fact, as
11 defendant knew, defendant had joint taxable income for the calendar year 2020 that was greater
12 than the amount reported on the tax return, and as a result of such additional taxable income,
13 there was additional tax due and owing to the United States of America; and

14 c. reporting, and causing to be reported that he owned and operated multiple sole
15 proprietorship businesses that had various expenses and losses, expenses and losses that he knew
16 to be false or inflated, and expenses and losses defendant reported or caused to be reported in
17 order to understate income on his U.S. Individual Income Tax Return, Form 1040.

18 All in violation of Title 26, United States Code, Section 7201.

19 COUNT FIVE: (26 U.S.C. § 7201 – Tax Evasion – 2021)

20 14. The allegations contained in paragraphs 1 through 5 of this Information are hereby re-
21 alleged and incorporated herein by reference.

22 15. From in or about January 2021, through in or about January 28, 2022, in the Northern
23 District of California and elsewhere, the defendant,

24 HOWARD SOLOMON,

25 a resident of the Northern District of California, owing more federal income tax than was declared due
26 on his federal income tax returns, and knowing this fact, did willfully and knowingly attempt to evade
27 and defeat income tax due and owing by him to the United States of America, for the calendar year
28 2021, by committing the following affirmative acts, among others:

1 a. preparing and causing to be prepared, and signing and causing to be signed, and
2 filing and causing to be filed with the Internal Revenue Service a false and fraudulent U.S.
3 Individual Income Tax Return, Form 1040, in the name of the defendant, for tax year 2021,
4 which was submitted to the Internal Revenue Service;

5 b. reporting, and causing to be reported that his taxable income for the calendar year
6 2021 was \$92,873, and that the amount of tax due and owing was \$14,359, when in fact, as
7 defendant knew, defendant had joint taxable income for the calendar year 2021 that was greater
8 than the amount reported on the tax return, and as a result of such additional taxable income,
9 there was additional tax due and owing to the United States of America; and

10 c. reporting, and causing to be reported that he owned and operated multiple sole
11 proprietorship businesses that had various expenses and losses, expenses and losses that he knew
12 to be false or inflated, and expenses and losses defendant reported or caused to be reported in
13 order to understate income on his U.S. Individual Income Tax Return, Form 1040.

14 All in violation of Title 26, United States Code, Section 7201.

15
16 DATED: February 26, 2025

PATRICK D. ROBBINS
Acting United States Attorney

17
18 */s/ Thomas R. Green*
THOMAS R. GREEN
Assistant United States Attorney
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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

FILED
Feb 26 2025
Mark B. Busby
CLERK, U.S. DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
OAKLAND

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. HOWARD SOLOMON,

CASE NUMBER:

CR 4:25-cr-00054-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: 2/26/2025

Comments: