

FILED

MAY 18 2017 ✓

SUSAN Y. SOONG
CLERK, U.S. DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
OAKLAND

1 BRIAN J. STRETCH (CABN 163973)
2 United States Attorney

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8 UNITED STATES DISTRICT COURT
9 NORTHERN DISTRICT OF CALIFORNIA
10 SAN FRANCISCO DIVISION

RS

12 UNITED STATES OF AMERICA,

13 Plaintiff,

14 v.

15 REBECCA SOLOMON
16 a/k/a Rebecca Mori,

17 Defendant.

) CASE NO. CR17-00282

) VIOLATIONS: 18 U.S.C. § 1343 – Wire Fraud; 18
) U.S.C. §§ 981(a)(1)(C) and 28 U.S.C. § 2461(c) –
) Criminal Forfeiture

) SAN FRANCISCO VENUE

18
19 INDICTMENT

20 The Grand Jury charges:

21 INTRODUCTORY ALLEGATIONS

22 At all times relevant to this Indictment:

23 1. Defendant REBECCA SOLOMON resided in San Mateo, California.

24 2. SOLOMON maintained Citibank and other bank accounts at branches located in the
25 Northern District of California.

26 3. SOLOMON conducted business transactions with the individual M.F. and M.F.'s
27 husband, D.F. M.F. and D.F. resided in San Mateo County, California. SOLOMON presented herself
28 as "Rebecca Mori" to M.F. and D.F.

INDICTMENT

The Scheme to Defraud

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2 4. From in or about January 2013 through in or about April 2017, in the Northern District of
3 California and elsewhere, the defendant,

4 REBECCA SOLOMON
5 a/k/a Rebecca Mori,

6 and others, engaged in a scheme to defraud clients of money and property.

7 5. In furtherance of this scheme to defraud, in 2013, Co-Conspirator #1 convinced M.F. to
8 invest money with a "Rebecca Mori" for a real estate project in London, with a projected return of \$195
9 million. Thereafter, SOLOMON advised M.F. to invest money with SOLOMON's putative property
10 company, Mori Premier Properties. Between 2013 and 2016, M.F. invested more than \$4 million with
11 SOLOMON's property company, Mori Premier Properties. SOLOMON and Co-Conspirator #1 told
12 M.F. that her money was used for a purchase of 10 acres of land in London by a Japanese company,
13 Mori Real Estate. SOLOMON claimed that she was brokering the deal for Mori Real Estate, telling
14 M.F. that Mori Premier Properties would receive \$195 million in commissions when the project was
15 completed.

16 5. It was a further part of the scheme to defraud that SOLOMON instructed M.F. to wire
17 \$123,000, and M.F. complied with that request. The \$123,000 wire posted on September 4, 2015 to
18 Citibank account -7164 in the name of Mori Premier Properties, which account was controlled by
19 SOLOMON, Co-Conspirator #1, and Co-Conspirator #1's son. The wire was processed by Federal
20 Reserve computer servers in the state of Texas. Prior to M.F. wiring the funds, SOLOMON and Co-
21 Conspirator #1 falsely represented to M.F. that they would use the money for a real estate project in
22 London, with a projected return of \$195 million.

23 6. It was a further part of the scheme to defraud that SOLOMON instructed M.F. to wire
24 \$100,000, and M.F. complied with that request. The \$100,000 wire posted on November 10, 2016 to
25 Citibank account -7158 in the name of "Rebecca Mori." The wire was processed by Federal Reserve
26 computer servers in the state of Texas. Prior to M.F. wiring the funds, SOLOMON and Co-Conspirator
27 #1 falsely represented to M.F. that they would use the money for a real estate project in London, with a
28 projected return of \$195 million.

7. It was a further part of the scheme to defraud that, SOLOMON and Co-Conspirator #1 made false statements to M.F. and D.F. on various occasions, lulling M.F. and D.F. to believe that the funds were being used for a London project. For example, on or about January 22, 2017, SOLOMON and Co-Conspirator #1 met in person with M.F. and D.F. in San Mateo County, California. During this meeting, SOLOMON and Co-Conspirator #1 falsely represented to M.F. and D.F. that SOLOMON had in fact used their money for the London project. When M.F. asked for paperwork regarding the project, SOLOMON stated that she had left the paperwork in Tokyo.

8. It was a further part of the scheme to defraud that SOLOMON used M.F.'s and D.F.'s money for personal expenses, including luxury item purchases from Hermes, Tourneau, Viau Estate Jewelry, Neiman Marcus, Fox Jewelry, Michael Kors, Burberry, and Louis Vuitton.

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

9. Paragraphs 1 through 8 of this Indictment are hereby re-alleged and incorporated by reference as if set forth in full herein.

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

REBECCA SOLOMON
a/k/a Rebecca Mori,

having devised and intended to devise a scheme and artifice to defraud as to a material matter, and for obtaining money and property by means of material false and fraudulent pretenses, representations, and promises, and by concealment of material facts, did knowingly transmit and cause to be transmitted by means of wire communication in interstate commerce the following writings, signs, signals, pictures, and sounds for the purpose of executing such scheme and artifice, and attempting to do so.

<u>Count</u>	<u>Date</u>	<u>Wire Amount</u>
1	09/04/15	\$123,000
2	11/10/16	\$100,000

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

1 FORFEITURE ALLEGATION: 18 U.S.C. §§ 981(a)(1)(C) and 28 U.S.C. § 2461(c) – Criminal
2 Forfeiture

3 11. Paragraphs 1 through 10 of this Indictment are hereby re-alleged and incorporated by
4 reference as if set forth in full herein.

5 12. Upon conviction of any of the offenses alleged in Counts One through Two of this
6 Indictment, the defendant,

7 REBECCA SOLOMON
8 a/k/a Rebecca Mori,


9 shall forfeit to the United States of America pursuant to Title 18, United States Code, Section
10 981(a)(1)(C) and Title 28, United States Code, Section 2461(c), any property, real or personal, which
11 constitutes or is derived from proceeds traceable to the offense.

12 DATED: May 18, 2017

A TRUE BILL.

13
14 
15 FOREPERSON

16 BRIAN J. STRECTCH
17 United States Attorney

18 
19 BARBARA J. VALLIERE
20 Chief, Criminal Division

21 (Approved as to form: )
22 AUSA Chinhayi Coleman Cadet