

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**

26 U.S.C. § 7201 - Attempt to Evade and Defeat the Payment of Tax

- Petty
- Minor
- Misdemeanor
- Felony

PENALTY: 26 U.S.C. § 7201 - 5 years prison, \$250,000 fine, 3 years supervised release, \$100 assessment

DEFENDANT - U.S.

JACK CARLO ISAACS

DISTRICT COURT NUMBER

OR 16 168  
 2016 APR 21 AM 10:30  
 CLERK OF DISTRICT COURT  
 N.D. DIST. OF CA.  
 FILED JD

**PROCEEDING**

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

INTERNAL REVENUE SERVICE

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 re prosecution 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

**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

Name and Office of Person Furnishing Information on this form BRIAN J. STRETCH

U.S. Attorney  Other U.S. Agency

Name of Assistant U.S. Attorney (if assigned) Cynthia Stier, AUSA, Tax Div.

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: \_\_\_\_\_

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BRIAN J. STRETCH (CABN 163973)  
Acting United States Attorney

FILED  
2016 APR 21 A 10:30  
SUPERIOR COURT  
CLERK, U.S. DISTRICT COURT  
NO. DIST. OF CAL.

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
OAKLAND DIVISION

JD

UNITED STATES OF AMERICA,

Plaintiff,

v.

JACK CARLO ISAACS,

Defendant.

CASE NO. **CR 16 168**

VIOLATION: 26 U.S.C. § 7201 – Attempt to Evade  
and Defeat the Payment of Tax

OAKLAND VENUE

INFORMATION

The United States Attorney charges:

On or about September 26, 2012, and continuing to April 2, 2013, in the District of Northern  
California and elsewhere, the defendant,

JACK CARLO ISAACS,

a resident of Oakland, California, and owner and operator of Isaacs Dental Inc., did willfully attempt to  
evade and defeat the payment of his federal income tax liabilities, due and owing to the United States of  
America, for the periods and in amounts identified below:

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Tax Period	Tax Form	Date of Assessment	Unpaid Balance of Tax as of September 26, 2012.	Unpaid Balance of Interest as of September 26, 2012
2002	1040	11/15/07	\$ 35,128	\$31,924.02
2003	1040	02/25/08	\$ 47,313	\$14,083.90
2005	1040	11/06/06	\$ 6,418	\$ 346.62
2009	1040	11/15/10	\$ 31,692	\$ 780.48
2010	1040	11/14/11	\$ 41,739	\$ 933.06
2011	1040	11/12/12	\$ 9,013	\$ 0.00
Total			\$171,303	\$ 48,068.08

by committing various affirmative acts of evasion, including:

1. Sending Bank of America check #854, bank account No. xxxx-01942, in the amount of \$414,300, to the IRS on September 26, 2012, to be applied to his income tax liabilities for tax years 2003, 2005, 2009 and 2010, when he then and there knew that there were insufficient funds in that bank account to pay these tax liabilities and that, in fact, he had closed bank account No. xxxx-01942.

2. Sending Bank of America check #106, bank account No. xxxx-52605, in the amount of \$9,122, to the IRS on November 9, 2012, to be applied to his income tax liabilities for tax year 2011 when he then and there knew that there were insufficient funds in that bank account to pay the tax liability and that, in fact, he had closed bank account No. xxxx-52605.

3. Sending nine (9) fake money orders to the IRS on March 8, 2013, purporting to pay his income tax liabilities for 2002, 2003, 2005, 2009, 2010 and 2011, when he knew these money orders were fake.

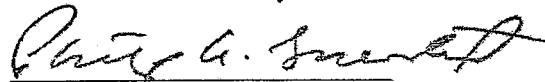
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1 - 4. Sending a fake money order to the IRS on April 2, 2013, in the amount of \$1,212,338.13  
2 purporting to pay the outstanding balance of his income tax liability.

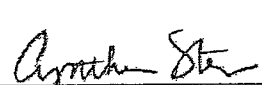
3 All in violation of Title 26, United States Code, Section 7201.

4 BRIAN I. STRETCH  
5 United States Attorney

6 Dated: 4/21/16

  
7 PHILIP A. GUENTERT  
8 Deputy Chief, Criminal Division.

9 Approved as to Form

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11 CYNTHIA STIER  
12 Assistant United States Attorney  
13 Tax Division  
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