UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA

Case No. 25-CR-1024 EMC

THE UNITED STATES OF AMERICA, )

)

v. )

)

OMNITECH SOLUTIONS, INC., )

a Delaware corporation, and )

RICHARD HAYES, )

an individual, )

)

Defendants. )

INDICTMENT

The Grand Jury charges:

COUNT ONE:

From in or about January 2022 through in or about March 2025, in the Northern District of California and elsewhere, the defendants OMNITECH SOLUTIONS, INC., and RICHARD HAYES, knowingly and willfully combined, conspired, confederated, and agreed to commit honest services fraud, in violation of Title 18, United States Code, Section 1346, by depriving OmniTech shareholders of their right to the honest services of its officers and employees through bribery and kickback schemes.

COUNT TWO:

On or about July 15, 2023, in the Northern District of California, the defendants knowingly caused OmniTech to submit false financial statements to the Securities and Exchange Commission, omitting material liabilities in excess of $14 million, thereby violating Title 15, United States Code, Sections 78j(b) and 78ff, and SEC Rule 10b-5.