

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA**

**Holding a Criminal Term
Grand Jury Sworn in on May 5, 2015**

UNITED STATES OF AMERICA	:	CRIMINAL NO.
	:	
v.	:	Grand Jury Original
	:	
MAHAN AIR,	:	
	:	VIOLATIONS:
KRAL HAVACILIK IC VE DIS TICARET SIRKETI, d/b/a KRAL AVIATION,	:	18 U.S.C. § 371 (Conspiracy)
	:	
TOUFAN AMIRI LARIJANI also known as: TOUFAN LARIJANI	:	50 U.S.C. § 1705 (International Emergency Economic Powers Act Violations)
	:	
PEYMAN AMIRI LARIJANI, also known as: PAYMEN LARIJANI,	:	31 C.F.R. Part 560 (Iranian Transactions Regulations)
	:	
JAVAD RAJABI,	:	
	:	
ARZU SAGSOZ,	:	31 C.F.R. Part 594 (Global Terrorism Sanctions Regulations)
	:	
MEHDI BAHRAMI,	:	
	:	
AND	:	
	:	15 C.F.R. Parts 730-774 (Export Administration Regulations)
GHODRATOLLAH ZAREI,	:	
	:	
Defendants.	:	18 U.S.C. § 1956 (Money Laundering)
	:	
	:	18 U.S.C. § 2 (Aiding and Abetting)
	:	
	:	18 U.S.C. § 981(a)(1)(C) 28 U.S.C. § 2461(c)

: 18 U.S.C. § 982(a)(1)
: 21 U.S.C. § 853(p)
: (Criminal Forfeiture)
:

INDICTMENT

The Grand Jury charges that:

COUNT ONE

(Conspiracy)

At all times material to this Indictment:

A. Introduction

The Defendants

1. Defendant **MAHAN AIR** was a private Iranian passenger airline located in Tehran, Iran, and organized under the laws of Iran.

2. Defendant **KRAL HAVACILIK IC VE DIS TICARET SIRKETI**, doing business as **KRAL AVIATION**, was a company which brokered aircraft parts and related goods on behalf of foreign customers. Defendant **KRAL AVIATION** was registered in the Republic of Turkey with a mailing address of Florya Senlikkoy Mh. Gumus Sk. Sırlın Vlia No: 3/1, 1 Bakukoy-Istanbul, Turkey and a physical address at EGS Business Park, Ataturk CAD, Blok ln.12 B2 Blok K.6. D.234, Bakirkoy, Istanbul, Turkey.

3. Defendant **TOUFAN AMIRI LARIJANI**, also known as **TOUFAN LARIJANI**, was a citizen of Iran and resident of Turkey. Defendant **TOUFAN AMIRI LARIJANI** was the general manager of Defendant **KRAL AVIATION**.

4. Defendant **PEYMAN AMIRI LARIJANI**, also known as **PAYMEN LARIJANI**, was a citizen of Iran and resident of Turkey. Defendant **PEYMAN AMIRI LARIJANI** was the operations manager of Defendant **KRAL AVIATION**.

5. Defendant **JAVAD RAJABI** was a citizen of Iran. Defendant **JAVAD RAJABI** was the commercial manager of Defendant **KRAL AVIATION**.

6. Defendant **ARZU SAGSOZ** was a citizen of Turkey. Defendant **ARZU SAGSOZ** was responsible for purchasing and logistics of Defendant **KRAL AVIATION**.

7. Defendant **MEHDI BAHRAMI** was a citizen of Iran and resident of Turkey. Defendant **MEHDI BAHRAMI** was the Vice President (Europe) for Defendant **MAHAN AIR**.

8. Defendant **GHODRATOLLAH ZAREI** was a citizen of Iran. Defendant **GHODRATOLLAH ZAREI** was the Director of Technical Logistics for Defendant **MAHAN AIR**.

The Iran Trade Embargo and the Iranian Transactions Regulations

9. The International Emergency Economic Powers Act (“IEEPA”), 50 U.S.C. §§ 1701-1706, authorizes the President of the United States (“the President”) to impose economic sanctions on a foreign country in response to an unusual or extraordinary threat to the national security, foreign policy or economy of the United States when the President declares a national emergency with respect to that threat.

10. On March 15, 1995, the President issued Executive Order No. 12957, finding that “the actions and policies of the Government of Iran constitute an unusual and extraordinary threat to the national security, foreign policy, and economy of the United States” and declaring “a national emergency to deal with that threat.” Executive Order No. 12957, as expanded and continued by Executive Orders Nos. 12959 and 13059, was in effect at all times relevant to this Indictment.

11. Executive Orders Nos. 12959 and 13059 (collectively, with Executive Order No. 12957, “Executive Orders”) imposed economic sanctions, including a trade embargo, on

Iran. The Executive Orders prohibited, among other things, the exportation, reexportation, sale, or supply, directly or indirectly, to Iran of any goods, technology, or services from the United States or by a United States person. The Executive Orders also prohibited any transaction by any United States person or within the United States that evaded or avoided, or had the purpose of evading or avoiding, any prohibition set forth in the Executive Orders.

12. The Executive Orders authorized the United States Secretary of the Treasury, in consultation with the United States Secretary of State, “to take such actions, including the promulgation of rules and regulations, as may be necessary to carry out the purposes” of the Executive Orders. Pursuant to this authority, the Secretary of the Treasury, through the Office of Foreign Assets Control (“OFAC”), promulgated the Iranian Transactions Regulations (“ITR”), 31 C.F.R. Part 560, implementing the sanctions required by the Executive Orders.¹

13. Specifically, absent permission from OFAC in the form of a license, the ITR prohibited, among other things:

- a. The exportation, reexportation, sale, or supply, directly or indirectly, from the United States, or by a United States person, wherever located, of any goods, technology, or services to Iran or the Government of Iran, including the exportation, reexportation, sale, or supply of any goods, technology, or services to a person in a third country undertaken with knowledge or reason to know that such goods, technology, or services are intended specifically for supply, trans-shipment, or reexportation, directly or indirectly, to Iran or the Government of Iran (31 C.F.R. § 560.204);
- b. The reexportation from a third country, directly or indirectly, by a person other

¹ On October 22, 2012, the Department of the Treasury’s Office of Foreign Assets Control renamed the “Iranian Transactions Regulations” as the “Iranian Transactions and Sanctions Regulations” (“ITSR”) and reissued them in their entirety. The conduct described herein was unlawful both under the ITR and the renamed ITSR.

than a United States person, of any goods, technology, or services that have been exported from the United States, if: (a) such reexportation is undertaken with knowledge or reason to know that the reexportation is intended specifically for Iran or the Government of Iran, and (b) the exportation of such goods, technology, or services, was subject to export license application requirements under any United States regulations (31 C.F.R. § 560.205); and

- c. Any transaction by any United States person or within the United States that evades or avoids, or has the purpose of evading or avoiding, or attempts to violate, any of the prohibitions contained in the ITR (31 C.F.R. § 560.203).

14. OFAC also administers and enforces economic and trade sanctions based on U.S. foreign policy and national security goals against targeted foreign countries and regimes, terrorists, international narcotics traffickers, those engaged in activities related to the proliferation of weapons of mass destruction, and other threats to the national security, foreign policy or economy of the United States. As part of its enforcement efforts, OFAC publishes a list of individuals and companies owned or controlled by, or acting for or on behalf of, targeted countries. It also lists individuals, groups, and entities, such as terrorists and narcotics traffickers designated under programs that are not country-specific. Collectively, such individuals and companies are called "Specially Designated Nationals" or "SDNs." Their assets are blocked and U.S. persons are generally prohibited from dealing with them. *See* 31 C.F.R. Part 594 (Global Terrorism Sanctions Regulations).

15. The Executive Orders and the Iranian Transactions Regulations and the Global Terrorism Sanctions Regulations were in effect at all times relevant to this Indictment.

The Export Administration Regulations

16. The United States Department of Commerce (“DOC”), located in the District of Columbia, was responsible for reviewing and controlling the export of certain goods and technologies from the United States to foreign countries. The Export Administration Act (“EAA”), 50 U.S.C. §§ 4601-4623, authorized the Department of Commerce to prohibit or curtail the export of any goods and technology as necessary, to protect, among other things, the national security and foreign policy of the United States. The Department of Commerce, through the Bureau of Industry and Security (“BIS”), implemented that authority through the Export Administration Regulations (“EAR”), 15 C.F.R. Parts 730-774. Although the EAA had lapsed, the EAR continued to be in effect under the provisions of IEEPA by virtue of Executive Order 13222 (August 17, 2001), as extended by successive Presidential notices, the most recent being on August 4, 2016. *See, e.g.*, 81 Fed. Reg. 52,587 (Aug. 8, 2016).

17. Through the EAR, BIS reviewed and controlled the export from the United States to foreign countries of certain U.S. items. 15 C.F.R. §§ 734.2-.3. In particular, BIS placed restrictions on the export and reexport of items that it determined could make a significant contribution to the military potential or nuclear proliferation of other nations or that could be detrimental to the foreign policy or national security of the United States. Under the EAR, such restrictions depended on several factors, including the technical characteristics of the item, the destination country, the end user, and the end use.

18. The most sensitive items subject to EAR controls were identified on the Commerce Control List, or “CCL,” set forth in Title 15, Code of Federal Regulations, Part 774, Supplement Number 1. Items listed on the CCL were categorized by Export Control Classification Number (“ECCN”), each of which had associated export control requirements

above and beyond the destination, end use, and end user based license requirements which may apply to items that are subject to the EAR but not categorized on the CCL. Reexported U.S.-origin commercial aircraft engines were both subject to the EAR and classified under ECCN 9A991. Commodities controlled by ECCN 9A991 were restricted from export or reexport to prohibited destinations, including Iran, without the authorization of the U.S. Government in the form of an export license. These restrictions were based on both the ITR and the “Anti-Terrorism” policy control associated with items classified under ECCN 9A991. A license was required for the export or reexport of any item subject to Anti-Terrorism control reasons to Iran based on the Secretary of State having designated Iran as “a country whose Government has repeatedly provided support for acts of international terrorism.” See 15 C.F.R. § 742.8

19. A Temporary Denial Order (“TDO”) is an administrative order issued under the authorities of the EAR and signed by the Assistant Secretary of Commerce for Export Enforcement when presented with evidence demonstrating the need to “temporarily deny export privileges when such an order is necessary in the public interest to prevent the occurrence of an imminent violation.” 15 C.F.R. § 764.6(c) Any named parties to the TDO, which further encompass any related parties, agents, representatives or those acting for or on their behalf, were broadly prohibited from directly or indirectly participating “in any way” in a transaction involving U.S.-origin commodities or those subject to the EAR.

20. The EAR made it unlawful to attempt conduct prohibited by, or contrary to, or refrain from engaging in any conduct required by, the EAR. It is also unlawful to violate any order, license or authorization issued thereunder; to cause, aid, abet, solicit, attempt, or conspire to commit a violation of the EAR, or any order, license, or authorization issued thereunder. The EAR prohibited the ordering, buying, removing, concealing, storing, use, sale, loan, disposition, transfer, transport, financing, forwarding, or other servicing, in whole or in part, of any item

exported or to be exported from the United States, that is subject to the EAR, with knowledge that a violation of the EAR, or any order, license, or authorization issued thereunder, has occurred. *See* 15 C.F.R. § 764.2(a)-(e).

Iranian Entities

21. Defendant **MAHAN AIR** operated multiple U.S.-origin aircraft. On March 17, 2008, the Department of Commerce, located within the District of Columbia, signed a Temporary Denial Order (“TDO”) denying defendant **MAHAN AIR**'s export privileges. The TDO broadly prohibited **MAHAN AIR** and/or other persons or companies acting for or on **MAHAN AIR**'s behalf, directly or indirectly, from participating in any export transaction. This TDO has been successively renewed, the latest renewal of which occurred on July 7, 2016. On October 12, 2011, OFAC added defendant **MAHAN AIR** to the OFAC SDN list pursuant to Executive Order 13224 for providing financial, material and technological support to the Islamic Revolutionary Guard Corps-Qods Force (“IRGC-QF”). The SDN designation limited defendant **MAHAN AIR**'s ability to engage in U.S. dollar transactions, and prohibited any goods, technology, or services from being exported, reexported, sold or supplied, directly or indirectly, from the United States to a SDN. *See* 31 C.F.R. § 594.204.

22. The conduct alleged in this Indictment began outside of the jurisdiction of any particular State or district, and later occurred within the District of Columbia and elsewhere, and is therefore within the venue of the United States District Court for the District of Columbia, as provided by Title 18, United States Code, Sections 3237(a) and 3238.

B. The Conspiracy

23. Beginning in or around April 2012 through in or about September 2012, within the District of Columbia and elsewhere, defendants **MAHAN AIR**, **KRAL AVIATION**,

TOUFAN AMIRI LARIJANI, PEYMAN AMIRI LARIJANI, JAVAD RAJABI, ARZU SAGSOZ, MEHDI BAHRAMI, and GHODRATOLLAH ZAREI did knowingly combine, conspire, confederate and agree with others known and unknown to the Grand Jury, to commit offenses against the United States, and to defraud the United States, more particularly:

- A. to export, attempt to export, and cause the export of aircraft engines, from the United States to Iran in violation of the embargo imposed upon that country by the United States, and to provide services within the United States to an SDN, to wit, defendant **MAHAN AIR**, without having first obtained the required licenses or authorizations from the OFAC, United States Department of the Treasury, located in the District of Columbia, in violation of Title 50, United States Code, Sections 1702 and 1705; and Title 31, Code of Federal Regulations, §§ 560.203 through 560.205 and §§ 594.204 and 594.205; and
- B. to defraud the Department of the Treasury and the Department of Commerce by interfering with and obstructing a lawful government function, that is, the enforcement of laws and regulations prohibiting the export or supply of goods from the United States to Iran and to restricted parties without authorization or a license, by deceit, craft, trickery, and dishonest means, in violation of Title 18, United States Code, Section 371.

Objects of the Conspiracy

- 24. The objects of the conspiracy were:
 - A. to acquire U.S.-origin aircraft engines to supply to defendant **MAHAN AIR** in Iran;

- B. to conceal from United States companies and the United States government that the U.S.-origin aircraft engines were destined for defendant **MAHAN AIR** in Iran;
- C. to make financial profit for defendants and other conspirators; and
- D. to evade the regulations, prohibitions, and licensing requirements of the IEEPA, the ITR, and the EAR.

Manner and Means of the Conspiracy

25. The conspirators would and did use the following manner and means, among others, to accomplish the objects of the conspiracy:

- A. Defendants **TOUFAN AMIRI LARIJANI, PEYMAN AMIRI LARIJANI, JAVAD RAJABI, ARZU SAGSOZ**, acting as agents of Defendant **KRAL AVIATION**, and Defendants **MEHDI BAHRAMI**, and **GHODRATOLLAH ZAREI**, acting on behalf of defendant **MAHAN AIR** in Iran, and other conspirators used e-mail accounts and other forms of communication to communicate with co-conspirators.
- B. Defendant **KRAL AVIATION** wired money from accounts outside of the United States to accounts of companies in the United States as payment for the purchased aircraft engine.
- C. Defendants **MAHAN AIR, KRAL AVIATION, TOUFAN AMIRI LARIJANI, PEYMAN AMIRI LARIJANI, JAVAD RAJABI, ARZU SAGSOZ, MEHDI BAHRAMI**, and **GHODRATOLLAH ZAREI**, and other conspirators intentionally concealed from companies, shippers, and freight forwarders located in the United States the ultimate end-user of the

purchased aircraft engine.

D. Defendants **MAHAN AIR, KRAL AVIATION, TOUFAN AMIRI LARIJANI, PEYMAN AMIRI LARIJANI, JAVAD RAJABI, ARZU SAGSOZ, MEHDI BAHRAMI,** and **GHODRATOLLAH ZAREI** and other conspirators caused shipment of the aircraft engine to be made from the United States, with the express purpose of then reexporting the aircraft engine from Turkey to Iran.

E. Defendants **MAHAN AIR, KRAL AVIATION, TOUFAN AMIRI LARIJANI, PEYMAN AMIRI LARIJANI, JAVAD RAJABI, ARZU SAGSOZ, MEHDI BAHRAMI,** and **GHODRATOLLAH ZAREI** and other conspirators caused the aircraft engine to be exported from the United States to an entity in Iran without obtaining a license or other authorization from the United States Department of the Treasury, Office of Foreign Assets Control, or the United States Department of Commerce, Bureau of Industry and Security.

Overt Acts

26. In furtherance of this conspiracy, and to accomplish its purposes and objects, at least one of the conspirators committed or caused to be committed, in the District of Columbia, and elsewhere, at least one of the following overt acts, among others:

- (1) In or about April 2012, **JAVAD RAJABI** joined **KRAL AVIATION** as Commercial Director. **RAJABI** and **KRAL AVIATION** requested a meeting with **MAHAN AIR** officials, including **MEHDI BAHRAMI** for the purpose of discussing on-going business between **KRAL AVIATION**

and **MAHAN AIR**.

- (2) On or about June 6, 2012 **GHODRATOLLAH ZAREI** sent an email to **JAVAD RAJABI** and copied **MEHDI BAHRAMI**, indicating to **KRAL AVIATION** that **MAHAN AIR** was interested in ESN 517621.
- (3) On or about June 9, 2012, **GHODRATOLLAH ZAREI** sent an email to **JAVAD RAJABI**, copying **MEHDI BAHRAMI**, **TOUFAN AMIRI LARIJANI**, and **PEYMAN AMIRI LARIJANI**, and indicated that **MAHAN AIR** had transferred funds to **KRAL AVIATION**'s account and that **MAHAN AIR** had technically accepted ESN 517621.
- (4) On or about June 9, 2012, **JAVAD RAJABI** sent an email to **GHODRATOLLAH ZAREI**, copying **MEHDI BAHRAMI**, **TOUFAN AMIRI LARIJANI**, and **PEYMAN AMIRI LARIJANI**, and confirmed receipt of the funds transferred from **MAHAN AIR** to **KRAL AVIATION**'s account.
- (5) On or about June 14, 2012, **JAVAD RAJABI** sent an email to **GHODRATOLLAH ZAREI**, **TOUFAN AMIRI LARIJANI**, and **PEYMAN AMIRI LARIJANI**, copying **MEHDI BAHRAMI**, seeking the name of the company **MAHAN AIR** wished to be placed on the transaction documents for ESN 517621.
- (6) On or about June 16, 2012, **GHODRATOLLAH ZAREI** sent an email to **JAVAD RAJABI**, **TOUFAN AMIRI LARIJANI**, and **PEYMAN AMIRI LARIJANI**, copying **MEHDI BAHRAMI**, and indicated that the purported buyer would be "AAL Co in Turkey," a reference to Asian

Aviation Logistics (“AAL”).

- (7) On or about June 18, 2012, **TOUFAN AMIRI LARIJANI**, acting on behalf of **KRAL AVIATION**, signed a Letter of Intent (“LOI”) with U.S. Company A in Miami, Florida, the owner of ESN 517261, for the purchase of ESN 517621 for \$810,000.
- (8) On or about June 19, 2012, **KRAL AVIATION** caused a wire transfer in the amount of \$100,000 to be made from a financial institution in Turkey to a trust account at a financial institution in the United States, as a down payment for the purchase of ESN 517621.
- (9) On or about June 21, 2012, **JAVAD RAJABI** sent an email to **GHODRATOLLAH ZAREI**, **TOUFAN AMIRI LARIJANI**, and **PEYMAN AMIRI LARIJANI**, referencing “our meeting in Mahan Tower.” **RAJABI** included the ESNs of nine additional U.S.-origin aircraft engines of similar make and model to ESN 517621, for the purpose of soliciting additional business from **MAHAN AIR**.
- (10) On or about July 2, 2012, **MEHDI BAHRAMI** sent an email to **TOUFAN AMIRI LARIJANI**, asking **TOUFAN AMIRI LARIJANI** to review the draft Letter of Intent for the purchase of ESN 517621 by AAL from **KRAL AVIATION**.
- (11) On or about July 7, 2012, Co-Conspirator A, whose identity is known to the grand jury, sent an email to **TOUFAN AMIRI LARIJANI**, **JAVAD RAJABI**, and **ARZU SAGSOZ** discussing the technical inspection of ESN 517621, and other U.S.-origin aircraft engines, and indicating that

ESN 517621 was suitable for purchase.

- (12) On or about July 8, 2012, **JAVAD RAJABI** sent an email to **MEHDI BAHRAMI**, **GHODRATOLLAH ZAREI**, **TOUFAN AMIRI LARIJANI**, and **PEYMAN AMIRI LARIJANI** to discuss the final technical acceptance by **MAHAN AIR** of ESN 517621 and to conclude the process to purchase ESN 517621 from the United States.
- (13) On or about July 8, 2012, **JAVAD RAJABI** sent an email to **GHODRATOLLAH ZAREI**, copying **MEHDI BAHRAMI**, **TOUFAN AMIRI LARIJANI**, and **PEYMAN AMIRI LARIJANI**, which included technical review comments on ESN 517621 by Co-Conspirator A.
- (14) On or about July 11, 2012, **PEYMAN AMIRI LARIJANI** prepared an invoice for the purchase of ESN 517621 for \$1,060,000, less a \$75,000 down payment, which stated that ESN 517621 was to be purchased by **AAL**.
- (15) On or about July 19, 2012, **TOUFAN AMIRI LARIJANI** executed an Equipment Sales Agreement for ESN 517621 on behalf of **KRAL AVIATION**. **TOUFAN AMIRI LARIJANI** agreed that **KRAL** would not violate U.S. sanctions or export law in this transaction.
- (16) On or about July 19, 2012, **PEYMAN AMIRI LARIJANI** emailed **MEHDI BAHRAMI** and **GHODRATOLLAH ZAREI**, copying **JAVAD RAJABI**, **TOUFAN AMIRI LARIJANI**, and other **MAHAN AIR** officials. **PEYMAN AMIRI LARIJANI** attached an invoice to **MAHAN AIR** for travel expenses incurred by **KRAL AVIATION**

related to the inspection of ESN 517621 in the United States.

- (17) On or about July 20, 2012, **JAVAD RAJABI** sent an email to **MEHDI BAHRAMI** and **GHODRATOLLAH ZAREI**, which included photographs showing that ESN 517621 was ready to be exported from the United States.
- (18) On or about July 20, 2012, **KRAL AVIATION** caused a wire transfer in the amount of \$710,000 to be made from a financial institution in Turkey into a trust account at a financial institution in the United States, which represented the outstanding balance due to Company A for the purchase of ESN 517621.
- (19) On or about July 20, 2012, **ARZU SAGSOZ** sent an email to a U.S. freight forwarder that informed the U.S. freight forwarder that **KRAL AVIATION** had made its payment to Company A and directed the U.S. freight forwarder to load the engine onto a cargo aircraft for export to **KRAL AVIATION** in Turkey.
- (20) On or about July 24, 2012, **JAVAD RAJABI** emailed a copy of the Air Way Bill for ESN 517621 to **GHODRATOLLAH ZAREI** and **MEHDI BAHRAMI** indicating that it would arrive in Istanbul by July 31 and two other engines were ready for shipment awaiting payment.

(Conspiracy to Export U.S. Goods to Iran and Provide Services to an SDN and to Defraud the United States and the U.S. Department of the Treasury and the U.S. Department of Commerce in violation of Title 18, United States Code, Section 371, Title 50, United States Code, Section 1705, Title 31, Code of Federal Regulations, Sections 560.203 through 560.205; and 594.204 and 594.205.)

COUNT TWO

(Unlawful Exports and Attempted Exports to Embargoed Country and Provision of Services to an SDN)

27. The allegations in Paragraphs 1 through 22 of this Indictment are incorporated and realleged by reference herein.

28. In or about July 2012, in the District of Columbia, and elsewhere, defendants **MAHAN AIR, KRAL AVIATION, TOUFAN AMIRI LARIJANI, PEYMAN AMIRI LARIJANI, JAVAD RAJABI, ARZU SAGSOZ, MEHDI BAHRAMI,** and **GHODRATOLLAH ZAREI**, did knowingly and willfully violate the embargo against Iran by exporting and attempting to export and causing to be exported a U.S.-origin aircraft engine, ESN 517621, from the United States to Iran without having first obtained the required authorization and license from the Office of Foreign Assets Control, United States Department of the Treasury, located in the District of Columbia.

(Unlawful Export and Attempted Export to Embargoed Country and Provision of Services to an SDN, in violation of Title 50, United States Code, Sections 1702 and 1705; Title 31, Code of Federal Regulations, Sections 560.203 through 560.205 and 594.204 and 594.205; and Title 18, United States Code, Section 2)

COUNT THREE

(Willful Violation of a Denial Order)

29. The allegations in Paragraphs 1 through 22 of this Indictment are incorporated and re-alleged by reference herein.

30. Between in or about April 2012 through in or about September 2012 as to each count herein, in the District of Columbia, and elsewhere, defendants **MAHAN AIR, KRAL AVIATION, TOUFAN AMIRI LARIJANI, PEYMAN AMIRI LARIJANI, JAVAD RAJABI, ARZU SAGSOZ, MEHDI BAHRAMI, and GHODRATOLLAH ZAREI**, willfully violated a denial order issued by the Department of Commerce, located in the District of Columbia, by carrying on negotiations with others on behalf of a prohibited entity in Iran, namely **MAHAN AIR**, concerning the buying, receiving, using, selling, and delivering of U.S.-origin aircraft engine, ESN 517621, which is a U.S.-origin commodity subject to the Export Administration Regulations.

(Willful Violation of Denial Order, in violation of Title 50, United States Code, Section 1705; and Title 15, Code of Federal Regulations, Section 764.2(a), (b), (k); **Aiding and Abetting and Causing an Act to be Done**, in violation of Title 18, United States Code, Section 2.)

COUNT FOUR

(Conspiracy to Commit Money Laundering)

31. The allegations in Paragraphs 1 through 22 of this Indictment are incorporated and re-alleged by reference herein.

32. Beginning as early as in or around April 2012, the exact date being unknown to the Grand Jury, and continuing through at least September 2012, within the District of Columbia and elsewhere, the defendants, **MAHAN AIR, KRAL AVIATION, TOUFAN AMIRI LARIJANI, PEYMAN AMIRI LARIJANI, JAVAD RAJABI, ARZU SAGSOZ, MEHDI BAHRAMI, and GHODRATOLLAH ZAREI**, did knowingly and willfully combine, conspire, confederate and agree together and with other persons both known and unknown to the Grand Jury, to violate:

Title 18, United States Code, Section 1956(a)(2)(A), that is, to transport, transmit, and transfer, and attempt to transport, transmit, and transfer, funds, to a place in the United States from and through a place outside the United States, that is Turkey, with the intent to promote the carrying on of specified unlawful activity, to wit, an offense relating to violations of the Export Administration Act and the International Emergency Economic Powers Act; and

Title 18, United States Code, Section 1956(a)(2)(B)(i), that is, to transport, transmit, and transfer, and attempt to transport, transmit, and transfer, funds, to a place in the United States from and through a place outside the United States, that is Turkey, knowing that these funds represented the proceeds of some form of unlawful activity, to wit, an offense relating to violations of the Export Administration Act and the International Emergency Economic Powers Act, and knowing that the transportation, transmission, and transfer were designed in whole and in part to conceal and disguise the nature, the location, the source, the ownership, and the control of the proceeds of specified unlawful activity;

all in violation of Title 18, United States Code, Section 1956(h).

(Conspiracy to Commit Money Laundering, in violation of Title 18, United States Code, Section 1956)

FORFEITURE ALLEGATION

1. Upon conviction of any of the offenses alleged in Counts One through Three of this Indictment, defendants shall forfeit to the United States any property, real or personal, which constitutes, or is derived from proceeds traceable to these offenses, pursuant to Title 18, United States Code, Section 981(a)(1)(C) and Title 28, United States Code, Section 2461(c). The United States will also seek a forfeiture money judgment for a sum

of money equal to the value of any property, real or personal, which constitutes, or is derived from proceeds traceable to these offenses.

2. Upon conviction of the offense alleged in Count Four of this Indictment, the defendants shall forfeit to the United States any property, real or personal, involved in this offense, or any property traceable to such property pursuant to Title 18, United States Code, Section 982(a)(1). The United States will also seek a forfeiture money judgment for a sum of money equal to the value of any property, real or personal, involved in this offense, and any property traceable to such property.
3. If any of the property described above as being subject to forfeiture, as a result of any act or omission of the defendants:
 - A. cannot be located upon the exercise of due diligence;
 - B. has been transferred or sold to, or deposited with, a third party;
 - C. has been placed beyond the jurisdiction of the Court;
 - D. has been substantially diminished in value; or
 - E. has been commingled with other property that cannot be divided without difficulty;

the defendants shall forfeit to the United States any other property of the defendants, up to the value of the property described above, pursuant to Title 21, United States Code, Section 853(p).

(Criminal Forfeiture, pursuant to Title 18, United States Code, Section 981(a)(1)(C), Title 28, United States Code, Section 2461(c), Title 18, United States Code, Section 982(a)(1), and Title 21, United States Code, Section 853(p)).

A TRUE BILL

FOREPERSON

Channing D. Phillips / KK

Attorney of the United States in
and for the District of Columbia