

United States District Court

FOR THE
NORTHERN DISTRICT OF CALIFORNIA

VENUE: SAN JOSE

FILED
09 APR - 7 PM 3:53
CLERK: U.S. DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
EXHIBIT ROOM
RMW

CR 09 0357
UNITED STATES OF AMERICA,

v.

EVERTOP SERVICES SND BHD,
AMIR GHASEMI, MAJID KAKAVAND,
and ALEX RAMZI

HRL

DEFENDANT(S).

INDICTMENT

Conspiracy to Export Goods w/o a License (50 U.S.C. §§ 1702 & 1705 & 31 C.F.R. Parts 560.203 & 560.204); Exporting Goods w/o a License (50 U.S.C. §§ 1702 & 1705; 31 C.F.R. Parts 560.203 & 560.204; & 18 U.S.C. § 2); Conspiracy to Commit Money Laundering (18 U.S.C. § 1956(h)); Money Laundering (18 U.S.C. §§ 1956(a)(2) (A) & 2); Smuggling Goods (18 U.S.C. §§ 554 & 2); Conspiracy to Defraud the U.S. (18 U.S.C. § 371); False Statements (18 U.S.C. §§ 1001 & 2); & Forfeiture (50 U.S.C. app § 2410(g), 18 U.S.C. §§ 981 (a)(1)(C) & 982(a)(1), & 28 U.S.C. § 2461(c))

A true bill.

Arzeshmeh
Foreman

Filed in open court this 4-7 day of 2009

Simon Volt
Clerk

Arzeshmeh
Bail, \$ No bail

warrants as to
Ghasemi, Kakavand
and Ramzi

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RICHARD L. BAKER
CLERK U.S. DISTRICT COURT
SAN JOSE, CALIF.

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JOSEPH P. RUSSONIELLO (CABN 44332)
United States Attorney

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

RMW

SAN JOSE DIVISION

CR 09
No.

0357 HRL

UNITED STATES OF AMERICA,)
)
) Plaintiff,)
)
) v.)
)
) EVERTOP SERVICES SND BHD,)
) AMIR GHASEMI,)
) MAJID KAKAVAND, and)
) ALEX RAMZI,)
)
) Defendants.)

VIOLATIONS: Conspiracy to Export Goods Without a License (50 U.S.C. §§ 1702 and 1705 and 31 C.F.R. Parts 560.203 and 560.204); Exporting Goods Without a License (50 U.S.C. §§ 1702 and 1705; 31 C.F.R. Parts 560.203 and 560.204; and 18 U.S.C. § 2); Conspiracy to Commit Money Laundering (18 U.S.C. § 1956(h)); Money Laundering (18 U.S.C. §§ 1956(a)(2)(A) and 2); Smuggling Goods (18 U.S.C. §§ 554 and 2); Conspiracy to Defraud the United States (18 U.S.C. § 371); False Statements (18 U.S.C. §§ 1001 and 2); and Forfeiture (50 U.S.C. app § 2410(g), 18 U.S.C. §§ 981(a)(1)(C) and 982(a)(1), and 28 U.S.C. § 2461(c))

SAN JOSE VENUE

INDICTMENT

The Grand Jury charges:

At all times relevant to this Indictment:

INTRODUCTION

1. Defendant EVERTOP SERVICES SND BHD (hereinafter "EVERTOP SERVICES"), was a company that acted as an "electronic and electrical components and parts merchant." EVERTOP SERVICES purchased electronic equipment from companies in the

INDICTMENT

1 United States, and elsewhere, for customers in Iran. The registered business address for
2 EVERTOP was in Kuala Lumpur, Malaysia.

3 2. Defendant AMIR GHASEMI (hereinafter "GHASEMI"), was a citizen and
4 resident of Iran, and a Director of EVERTOP SERVICES.

5 3. Defendant MAJID KAKAVAND (hereinafter "KAKAVAND"), was a citizen and
6 resident of Iran, and a Director of EVERTOP SERVICES.

7 4. Defendant ALEX RAMZI (hereinafter "RAMZI"), was the Purchasing Supervisor
8 and Sales Representative for EVERTOP SERVICES.

9 5. The email address referred to herein as "EMAIL ADDRESS 1" was created on or
10 about January 10, 2006, and it was accessed primarily from Iran and Malaysia.

11 6. The email address herein referred to as "EMAIL ADDRESS 2" was created on or
12 about October 2, 2001, and it was frequently accessed from Iran.

13 7. A company herein referred to as "FREIGHT FORWARDER 1" was a freight
14 forwarder with offices in the United States and Kuala Lumpur, Malaysia, among other locations.

15 8. Iran Electronics Industry ("I.E.I.") was an organization located in Iran that offered
16 a diversified range of military products including electro-optics and lasers, communication
17 equipment, telecommunication security equipment, electronic warfare equipment, new and
18 refurbished radar tubes, and missile launchers. I.E.I. manufactured military tactical
19 communication systems and also electronic field telephones and switchboards. I.E.I. also
20 manufactured night vision systems and laser range finders in addition to binoculars and
21 periscopes.

22 9. Iran Communication Industries ("I.C.I.") was Iran's leading manufacturer of
23 military and civilian communication equipment and systems. I.C.I. offered tactical
24 communications and encryption systems that met a wide range of the Iranian military's
25 requirements.

26 The Iran Trade Embargo and the Iranian Transactions Regulations

27 10. The International Emergency Economic Powers Act ("IEEPA"), Title 50, United
28 States Code, Sections 1701-1706, authorizes the President of the United States ("the President")

1 to impose economic sanctions on a foreign country in response to an unusual or extraordinary
2 threat to the national security, foreign policy, or economy of the United States when the President
3 declares a national emergency with respect to that threat.

4 11. On March 15, 1995, the President issued Executive Order 12957 finding that "the
5 actions and policies of the Government of Iran constitute an unusual and extraordinary threat to
6 the national security, foreign policy, and economy of the United States," and declaring "a national
7 emergency to deal with that threat." Executive Order 12957, as expanded and continued by
8 Executive Orders 12959 and 13059, was in effect at all times relevant to this Indictment.

9 12. Executive Orders 12959 and 13059 (collectively, with Executive Order 12957,
10 "Executive Orders") impose economic sanctions, including a trade embargo, on Iran.
11 Specifically, the Executive Orders prohibit among other things, the exportation, reexportation,
12 sale or supply, directly or indirectly, to Iran of any goods, technology, or services from the United
13 States or by a United States person or within the United States that evades or avoids or has the
14 purpose of evading or avoiding, any prohibitions set forth in the Executive Orders.

15 13. The Executive Orders authorize the United States Secretary of Treasury, in
16 consultation with the United States Secretary of State, "to take such actions, including the
17 promulgation of rules and regulations, as may be necessary to carry out the purposes" of the
18 Executive Orders. Pursuant to this authority, the Secretary of Treasury promulgated the Iranian
19 Transactions Regulations, Title 31, Code of Federal Regulations, Part 560, implementing the
20 sanctions imposed by the Executive Orders.

21 14. The Iranian Transactions Regulations prohibit, among other things, the export,
22 reexport, sale or supply, directly or indirectly, of any goods, technology, or services from the
23 United States or by a United States person, wherever located, to Iran or the Government of Iran,
24 without prior authorization or license from the United States Department of Treasury, through
25 the Office of Foreign Assets Control. These regulations further prohibit any transactions that
26 evade or avoid or have the purpose of evading or avoiding any of the prohibitions contained in
27 the Iranian Transactions Regulations, including the unauthorized exportation of goods from the
28 United States to a third country if the goods are intended or destined for Iran.

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

3 16. At no time did the defendants, EVERTOP SERVICES, KAKAVAND,
4 GHASEMI, or RAMZI, apply for, receive, or possess a license or authorization from the Office
5 of Foreign Assets Control, United States Department of Treasury, to export goods, technology, or
6 services, of any description, to Iran.

7 Export and Shipping Records

8 17. Pursuant to United States law and regulation, exporters and shippers or freight
9 forwarders are required to file certain forms and declarations concerning exports of goods and
10 technology from the United States. Typically, those forms are filed electronically through the
11 Automated Export System ("AES") administered by the United States Department of Homeland
12 Security ("DHS"), Bureau of Customs and Border Protection. A Shipper's Export Declaration
13 ("SED") is an official document submitted to DHS in connection with export shipments from the
14 United States.

15 18. An essential and material part of the SED and AES, as well as other export filings,
16 is information concerning the end-user or ultimate destination of the export. The identity of the
17 end-user may determine whether the goods may be exported a) without any specific authorization
18 from the United States government; b) with the specific authorization or validated license from
19 the United States Department of Commerce, the United States Department of State, or the United
20 States Department of Treasury; or c) whether the goods may not be exported from the United
21 States.

22 19. The SED or AES is equivalent to a statement to the United States government that
23 the transaction occurred as described. The SED or AES is used by the United States Bureau of
24 Census to collect trade statistics and by the Bureau of Industry and Security, Department of
25 Commerce, for export control purposes.

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28 //

1 COUNT ONE: (Conspiracy to Export to an Embargoed Country) 50 U.S.C. §§ 1702 and 1705
2 and 31 C.F.R. Parts 560.203 and 560.204

3 20. The allegations in paragraphs 1 through 19 are incorporated and re-alleged by
4 reference in this Count.

5 21. Beginning as early as in or about January 2006, and continuing through the
6 present, in the Northern District of California and elsewhere, the defendants,

7 EVERTOP SERVICES,
8 AMIR GHASEMI,
9 MAJID KAKAVAND, and
10 ALEX RAMZI,

11 did knowingly and willfully combine, conspire, confederate, and agree with each other and with
12 others known and unknown to the Grand Jury, to commit offenses against the United States, that
13 is, to export and cause the exportation of goods, specifically, electronic equipment, from the
14 United States to Iran in violation of the embargo imposed upon that country by the United States,
15 without having first obtained the required licenses and authorizations from the Office of Foreign
16 Assets Control, United States Department of Treasury.

17 22. It was part of the conspiracy that GHASEMI and KAKAVAND
18 established the company EVERTOP SERVICES in Malaysia for the purpose of importing goods
19 from the United States and Europe and then exporting those goods to their customers in Iran.

20 23. It was further part of the conspiracy that EVERTOP SERVICES, GHASEMI,
21 KAKAVAND, and RAMZI caused electronic equipment to be exported from the United States
22 to individuals and entities in Iran without obtaining a license from the Office of Foreign Asset
23 Control, United States Department of Treasury.

24 24. It was further part of the conspiracy that GHASEMI, KAKAVAND, and RAMZI
25 all used EMAIL ACCOUNT 1 to conduct business on behalf of EVERTOP SERVICES, and
26 signed their names, "Amir," "Majid," and "Alex," respectively. GHASEMI, KAKAVAND, and
27 RAMZI used this email account to communicate with United States companies, FREIGHT
28 FORWARDER 1, and each other.

29 25. It was further part of the conspiracy that GHASEMI, KAKAVAND, and RAMZI
30 all used the email account EMAIL ACCOUNT 2 to conduct business on behalf of EVERTOP

1 SERVICES. GHASEMI, KAKAVAND, and RAMZI used this email account to communicate
2 with United States companies, FREIGHT FORWARDER 1, EVERTOP SERVICES' customers
3 in Iran, and each other.

4 26. It was further part of the conspiracy that EVERTOP SERVICES
5 and RAMZI contacted companies in the United States to purchase electronic items, such as
6 capacitors, resistors, sensors, connectors, measurement systems, reflectometers, and rivets.
7 During the procurement process, EVERTOP SERVICES and RAMZI sent emails with requests
8 for quote and purchase orders to companies in the United States.

9 27. It was further part of the conspiracy that during the procurement process,
10 EVERTOP SERVICES and RAMZI advised the United States companies that the end user for
11 the products was in Malaysia and that the products would not be transshipped to any third parties.

12 28. It was further part of the conspiracy that EVERTOP SERVICES, GHASEMI,
13 KAKAVAND, and RAMZI paid the United States companies for the products in United States
14 dollars by sending wire transfers directly to the accounts of the United States companies in the
15 United States.

16 29. It was further part of the conspiracy that EVERTOP SERVICES and RAMZI
17 intentionally concealed from the companies, shippers, and freight forwarders located in the
18 United States, the ultimate end-users or consignees of the items they purchased in the United
19 States.

20 30. It was further part of the conspiracy that EVERTOP SERVICES, KAKAVAND,
21 GHASEMI, and RAMZI caused United States companies and freight forwarders to include
22 materially false, misleading and incomplete information in documents, air waybills, and AES and
23 SED records.

24 31. It was further part of the conspiracy that EVERTOP SERVICES and RAMZI
25 advised the United States companies and the freight forwarders in the United States to ship the
26 items to EVERTOP SERVICES in Malaysia, care of FREIGHT FORWARDER 1.

27 32. It was further part of the conspiracy that EVERTOP SERVICES, GHASEMI, and
28 KAKAVAND sent Commercial Invoices to FREIGHT FORWARDER 1 that included the name

1 of the Iranian company that was the customer for the goods, an itemized list of the items to be
2 shipped to Iran, and a price in Euros or United States dollars.

3 33. It was further part of the conspiracy that EVERTOP SERVICES, GHASEMI, and
4 KAKAVAND directed FREIGHT FORWARDER 1 and caused FREIGHT FORWARDER 1 to
5 ship the items received from the United States companies to EVERTOP SERVICES' customers
6 in Iran, via IranAir. In all, EVERTOP SERVICES, GHASEMI, KAKAVAND, and RAMZI
7 re-exported more than 30 shipments of goods, valued at over \$1,187,212.00 that originated in the
8 United States to Iran.

9 34. In furtherance of the conspiracy and to effect the objects thereof, within the
10 Northern District of California and elsewhere, the defendants EVERTOP SERVICES,
11 GHASEMI, KAKAVAND, RAMZI, and others, did commit and cause to be committed the
12 following overt acts, among others:

13 OVERT ACTS

14 a. On or about February 26, 2006, KAKAVAND sent an email to an individual in
15 Malaysia seeking assistance in finding an employee for a company that he recently established in
16 Malaysia that traded in "electronic and electrical components and parts." KAKAVAND stated
17 that his company "mostly import[s] goods from USA and Europe and then export them to our
18 customers in Middle East and South East Asia."

19 b. On or about February 27, 2006, KAKAVAND sent an email to an individual in
20 Malaysia in which he stated that he and GHASEMI are the two directors for "a small private
21 company" that is established in Malaysia "for the sake of shipment purposes only."

22 c. On or about April 24, 2006, KAKAVAND sent an email to RAMZI in which he
23 described a "very difficult meeting" that he had with "ICI." KAKAVAND explained that "[t]hey
24 need the urgent items as urgently as possible. So it seems as if there is no way out except for
25 doing what they need. We have to be very much in a hurry. I have promised them to ship out
26 two orders of evertop within next 3 weeks." He also conveyed an "urgent inquiry" for items from
27 two specified United States companies, and asked RAMZI to have an offer for these items within
28 the week.

1 New Jersey Company Shipment

2 d. On or about December 12, 2006, RAMZI signed his name, "Alex," on a NEW
3 JERSEY COMPANY Export End User Form that listed, among other things, the end user for PO
4 06-16-ET-121 as EVERTOP SERVICES in Malaysia. By signing the form, RAMZI certified
5 that, "no item purchased from [EVERTOP SERVICES] will be exported or Reexported diverted
6 or transshipped via any embargoed countries."

7 e. On or about March 8, 2007, EVERTOP SERVICES and RAMZI caused NEW
8 JERSEY COMPANY to file an SED that indicated that "EVERTOP K LINE," located in
9 Malaysia, was the ultimate consignee for \$7,046 worth of resistors and capacitors being shipped
10 from New Jersey to Malaysia, and that for each of the items being shipped, no license was
11 required.

12 f. On March 14, 2007, KAKAVAND sent an email to FREIGHT FORWARDER 1
13 advising them to ship the items on the attached invoice (INV-06121.pdf), which included the
14 1000 capacitors and 400 resistors that EVERTOP SERVICES had purchased from NEW
15 JERSEY COMPANY, along with other items, to I.E.I. in Shiraz, Iran. KAKAVAND instructed
16 FREIGHT FORWARDER 1 to send the items via IranAir.

17 Alabama Company Shipment

18 g. On or about January 25, 2007, EVERTOP SERVICES and RAMZI responded to
19 an email from ALABAMA COMPANY entitled, "Re: Purchase Order Ref No.
20 06-15-ET-133-[ALABAMA COMPANY]," that said, "Please tell me the country that will be the
21 final destination for the items on this order." RAMZI responded, "We will use this equipment
22 for our projects in Malaysia."

23 h. In or about December 2007, KAKAVAND directed FREIGHT FORWARDER 1
24 to ship the "LPSR" from ALABAMA COMPANY on the first available Iran Air flight, and
25 indicated that the shipment was "very urgent."

26 i. On or about January 3, 2008, EVERTOP SERVICES and RAMZI caused
27 ALABAMA COMPANY to issue an SED for a shipment of \$91,000 worth of electrical
28 spectrometers and spectrographs to EVERTOP SERVICES, indicating that the ultimate

1 destination for these goods was Malaysia and that no license was required to ship them.

2 j. On or about January 3, 2008, EVERTOP SERVICES issued a Commercial
3 Invoice (INV-15-06133-2) to I.C.I. in Tehran, Iran, for one "LPSR-300 Spectro Reflectometer,"
4 valued at 88,000 Euros and one "Solar Absorptance Reference Puck Option" valued at 850
5 Euros.

6 Florida Company Shipment

7 k. On or about July 20, 2007, EVERTOP SERVICES and RAMZI caused FLORIDA
8 COMPANY to file an SED that indicated that EVERTOP SERVICES, located in Malaysia, was
9 the ultimate consignee for a shipment of \$117,460 worth of fixed capacitors being shipped from
10 FLORIDA COMPANY to Malaysia, and that no license was required for the shipment.

11 l. On or about July 23, 2007, EVERTOP SERVICES issued a Commercial Invoice
12 (INV-15-07204-2) to I.C.I. in Tehran, Iran, for, among other items, 3500 capacitors with a value
13 of 118,930 Euros.

14 California Company 1 Shipment

15 m. On or about November 15, 2007, EVERTOP SERVICES sent a wire transfer of
16 \$16,960.00 from its account at Maybank in Malaysia, to CALIFORNIA COMPANY 1's bank
17 account at Greater Bank N.A., located in San Jose, California.

18 n. On or about November 17, 2007, EVERTOP SERVICES and GHASEMI caused
19 CALIFORNIA COMPANY 1, located in Morgan Hill, California, to file an SED indicating that
20 EVERTOP SERVICES, located in Malaysia, was the ultimate consignee for \$17,000 worth of
21 pressure measurement instruments being shipped from Alaska to Malaysia, and that no license
22 was required for the shipment.

23 o. In or about November 2007, GHASEMI sent an email to FREIGHT
24 FORWARDER 1 entitled "RE: ACS and [CALIFORNIA COMPANY 1] shipment" in which he
25 advised that "We are in a hurry for below parts. Please kindly send =arts if AWBs aren't ready."

26 p. On or about November 22, 2007, EVERTOP SERVICES and GHASEMI caused
27 a freight forwarder to send the sensors purchased from CALIFORNIA COMPANY 1 to Farazeh
28 Tajhiz Gostar in Iran.

1 California Company 2

2 q. On or about December 3, 2007, EVERTOP SERVICES and RAMZI sent a
3 Purchase Order (07-15-ET-254-APS) to CALIFORNIA COMPANY 2, located in Campbell,
4 California, for 41,900 Radial Connectors with three product numbers: R114 186 000, R141 082
5 000, and R210 160 020, with a proposed purchase price of \$50,000.

6 r. On or about January 16, 2008, EVERTOP SERVICES and RAMZI sent a wire
7 transfer of \$51,425.00 from EVERTOP SERVICES' account at Maybank in Malaysia to
8 CALIFORNIA COMPANY 2's Wells Fargo bank account in Campbell, California.

9 s. On or about January 26, 2008, EVERTOP SERVICES and RAMZI caused
10 CALIFORNIA COMPANY 2 to file an SED indicating that EVERTOP SERVICES, located in
11 Malaysia, was the ultimate consignee for \$51,430 worth of electric resistor parts being shipped
12 from Los Angeles, California to Malaysia, and that no license was required for the shipment.

13 California Company 3

14 t. On or about January 9, 2008, RAMZI sent an email to CALIFORNIA
15 COMPANY 3, located in Milpitas, California, attaching a purchase order (PO #
16 07-15-ET-258-EPS) for inductors. RAMZI also stated that the payment for the shipment of these
17 items would be "Cash Prior to Shipment" which will be sent by wire transfer.

18 u. On or about January 17, 2008, RAMZI sent an email referencing Purchase Order
19 Ref No. 07-15-ET-258-EPS, to CALIFORNIA COMPANY 3, attaching an end-use statement
20 signed, "Alex," dated January 17, 2008, certifying in pertinent part that EVERTOP SERVICES
21 will not "use, transfer, export, re-export, resell or otherwise dispose of any items purchased from
22 [CALIFORNIA COMPANY 3] to any destination, end-user or for any end use prohibited by the
23 laws of the United States" and that EVERTOP SERVICES does not "ship to any countries that
24 are against US laws."

25 v. On or about March 7, 2008, EVERTOP SERVICES and RAMZI wired \$17,855
26 from their account at Maybank in Malaysia, to CALIFORNIA COMPANY 3's California Bank
27 and Trust account in Fremont, California.

28 w. On or about March 29, 2008, EVERTOP SERVICES and RAMZI caused

1 CALIFORNIA COMPANY 3 to file an SED indicating that the ultimate consignee for the
 2 shipment of \$17,875 worth of Inductors being shipped from California to Malaysia, was
 3 EVERTOP SERVICES in Malaysia, and that no license was required for the shipment.

4 x. On or about April 7, 2008, KAKAVAND sent an email to FREIGHT
 5 FORWARDER 1 attaching a Commercial Invoice for I.C.I., that included, among other items,
 6 2,500 inductors, with a total value of 16,500 Euros, and advising FREIGHT FORWARDER 1 to
 7 ship the items on the "first available Iran Air flight." In his email, KAKAVAND indicated that
 8 the inductors were from [CALIFORNIA COMPANY 3].

9 All in violation of in violation of Title 50, United States Code, Sections 1702 and 1705;
 10 and Title 31, Code of Federal Regulations, Parts 560.203 and 560.204.

11
 12 COUNTS TWO THROUGH FOUR: (Exports To an Embargoed Country) 50 U.S.C. §§ 1702
 and 1705 and 31 C.F.R. Parts 560.203 and 560.204 and 18 U.S.C. § 2

13
 14 35. On or about the dates listed as to each count below, in the Northern District of
 15 California and elsewhere, the defendants,

16 EVERTOP SERVICES,
 17 AMIR GHASEMI,
 MAJID KAKAVAND, and
 ALEX RAMZI,

18 did knowingly and willfully violate the embargo against Iran by exporting and causing to export
 19 goods, and attempting to export and cause to be exported goods, as described more fully below,
 20 from the United States to Iran, without first obtaining the required licenses and authorizations
 21 from the Office of Foreign Assets Control, United States Department of the Treasury.

22

COUNT	DATES	GOODS	CALIFORNIA COMPANY NO.
TWO	August 19, 2007 to November 27, 2007	Pressure Sensors	1
THREE	December 3, 2007 to February 5, 2008	Radiall Connectors	2
FOUR	January 9, 2008 to July 2, 2008	Inductors	3

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27 All in violation of Title 50, United States Code, Sections 1702 and 1705; Title 31, Code
 28 of Federal Regulations, Parts 560.203 and 560.204, and Title 18, United States Code, Section 2.

1 COUNT FIVE: (Conspiracy to Commit Money Laundering) 18 U.S.C. §§ 1956(a)(2)(A) and (h)

2 36. The factual allegations contained in paragraphs 1 through 19, and 22 through 34
3 are incorporated and re-alleged by reference in this Count.

4 37. From on or about January 2006, through the present, in the Northern District of
5 California, and elsewhere, the defendants,

6 EVERTOP SERVICES,
7 AMIR GHASEMI,
8 MAJID KAKAVAND, and
9 ALEX RAMZI,

10 did knowingly combine, conspire, and agree with each other and with other persons known and
11 unknown to the Grand Jury to commit offenses against the United States in violation of Title 18,
12 United States Code, Section 1956, specifically, to transmit and transfer funds, specifically, over
13 \$86,240.00, from a place outside the United States to a place in the United States with the intent
14 to promote the carrying on of specified unlawful activity, specifically, willfully exporting goods
15 from the United States to Iran without a license in violation of Title 50, United States Code,
16 Sections 1702 and 1705; Title 31, Code of Federal Regulations, Parts 560.203 and 560.204, and
17 knowingly and fraudulently smuggling goods from the United States in violation of Title 18,
18 United States Code, Section 554.

19 All in violation of Title 18, United States Code, Sections 1956(a)(2)(A) and (h).

20 COUNTS SIX THROUGH EIGHT: (Money Laundering) 18 U.S.C. §§ 1956(a)(2)(A) and 2

21 38. On or about the dates listed as to each count below, in the Northern District of
22 California and elsewhere, the defendants,

23 EVERTOP SERVICES,
24 AMIR GHASEMI,
25 MAJID KAKAVAND, and
26 ALEX RAMZI,

27 and others, did transmit and transfer and attempt to transmit and transfer funds, as described
28 more fully below for each count, from a place outside the United States, that is Malaysia, to a
place in the United States, that is California, with the intent to promote the carrying on of
specified unlawful activity, that is, willfully exporting goods from the United States to Iran

1 without a license in violation of Title 50, United States Code, Sections 1702 and 1705; Title 31,
 2 Code of Federal Regulations, Parts 560.203 and 560.204 and knowingly and fraudulently
 3 smuggling goods from the United States in violation of Title 18, United States Code, Section
 4 554.

COUNT	DATE	AMOUNT	CALIFORNIA COMPANY NO.
SIX	November 15, 2007	\$16,960.00	1
SEVEN	January 16, 2008	\$51,425.00	2
EIGHT	March 7, 2008	\$17,855.00	3

9 In violation of Title 18, United States Code, Sections 1956(a)(2)(A) and 2.

10
 11 COUNTS NINE THROUGH ELEVEN: (Smuggling Goods) 18 U.S.C. §§ 554 and 2

12 39. On or about the dates listed as to each count below, in the Northern District of
 13 California and elsewhere, the defendants,

14 EVERTOP SERVICES,
 15 AMIR GHASEMI,
 MAJID KAKAVAND, and
 16 ALEX RAMZI,

17 and others, did knowingly and fraudulently export and send, and attempt to export and send from
 18 the United States, merchandise, articles, and objects described more fully below, contrary to the
 19 laws and regulations of the United States, specifically, Title 50, United States Code, Sections
 20 1702 and 1705, and Title 31, Code of Federal Regulations, Parts 560.203 and 560.204.

COUNT	DATES	ITEMS	CALIFORNIA COMPANY NO.
NINE	August 19, 2007 to November 27, 2007	Pressure Sensors	1
TEN	December 3, 2007 to February 5, 2008	Radiall Connectors	2
ELEVEN	January 9, 2008 to July 2, 2008	Inductors	3

25 All in violation of Title 18, United States Code, Sections 554 and 2.

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1 COUNT TWELVE: (Conspiracy to Defraud the United States) 18 U.S.C. § 371

2 40. The allegations in paragraphs 1 through 19 and 22 through 34 are incorporated
3 and re-alleged by reference in this Count.

4 41. Beginning as early as in or about January 2006, and continuing through the
5 present, in the Northern District of California and elsewhere, the defendants,

6 EVERTOP SERVICES,
7 MAJID KAKAVAND,
8 AMIR GHASEMI, and
9 ALEX RAMZI,

10 did knowingly and willfully combine, conspire, confederate, and agree with each other and with
11 others known and unknown to the Grand Jury, to commit offenses against the United States,
12 specifically, to defraud the Department of the Treasury and the United States government by
13 interfering with and obstructing a lawful government function, that is, the enforcement of laws
14 and regulations prohibiting the export and supply of goods from the United States to Iran without
15 authorization or a license, by deceit, craft, trickery, and dishonest means in violation of Title 18,
16 United States Code, Section 371.

17 COUNTS THIRTEEN THROUGH FIFTEEN: (False Statements) 18 U.S.C. §§ 1001 and 2

18 42. The allegations in paragraphs 17 through 19 are incorporated and re-alleged by
19 reference in this Count.

20 43. Beginning as early as in or about January 2006, and continuing through the
21 present, in the Northern District of California and elsewhere, the defendants,

22 EVERTOP SERVICES,
23 MAJID KAKAVAND,
24 AMIR GHASEMI, and
25 ALEX RAMZI,

26 in a matter within the jurisdiction of the United States Department of Commerce and the United
27 States Department of Census, did knowingly and willfully cause to be falsified, concealed, and
28 covered up, by trick, scheme, and device, material facts, and caused to be made false, fictitious,
and fraudulent statements and representations as to a material fact, and caused to be made and
used a false writing and document knowing the same to contain false, fictitious and fraudulent

1 entry, by causing the maintenance for inspection by the United States Department of Commerce
 2 and the United States Department of Census, false and fictitious shipping documents, including
 3 air waybills, Automated Export System records, and Shipper's Export Declarations, which stated
 4 that 1) no license was required ("NLR"), and 2) the ultimate consignee was an entity located in
 5 Malaysia, as described more fully below for each count, when the defendants there and then
 6 knew that these statements were false, the ultimate destination for the goods was Iran, and a
 7 license was required for the shipment.

COUNT	DATE	ULTIMATE CONSIGNEE	CALIFORNIA COMPANY NO.
THIRTEEN	November 17, 2007	Evertop Svcs Sdn Bhd C/K-line Log M'sia, Lot C24 203 Jalan Bukit Bintag Kuala Lumpur, 55100 MY	1
FOURTEEN	January 26, 2008	Evertop Services Sdn Bhd Suite 33-01, 33fl, Menara Keck Seng Kuala Lumpur, 55100 MY	2
FIFTEEN	March 29, 2008	Evertop Services Sdn Bhd C/O KLine Logistics Sdn Bhd Lot C24, Malaysia Airlines Klia Free Trade Zone, Sepang, 64000 MY	3

17 In violation of Title 18, United States Code, Sections 1001 and 2.

18
 19 **FORFEITURE ALLEGATION ONE:** (Export Forfeiture) 50 U.S.C. app § 2410(g)

20 44. The factual allegations contained in Counts One through Four of this Indictment
 21 are re-alleged and by this reference fully incorporated herein for the purpose of alleging forfeiture
 22 pursuant to the provisions of Title 50, United States Code, app Section 2410(g).

23 45. Upon a conviction of any of the offenses alleged in Counts One through Four, the
 24 defendants,

25 EVERTOP SERVICES,
 26 MAJID KAKAVAND,
 27 AMIR GHASEMI, and
 28 ALEX RAMZI,

shall forfeit to the United States, pursuant to Title 50, United States Code, app Section 2410(g),

1 any property that was the subject of the export violations, any property that was used in the
2 export or attempted export violations, and any property which constitutes or is derived from any
3 proceeds obtained directly or indirectly as a result of the export violations, including but not
4 limited to all funds and bank accounts which facilitated the offenses.

5 46. If any of the property described above, as a result of any act or omission of the
6 defendants:

- 7 a. cannot be located upon the exercise of due diligence;
- 8 b. has been transferred or sold to, or deposited with, a third party;
- 9 c. has been placed beyond the jurisdiction of the court;
- 10 d. has been substantially diminished in value; or
- 11 e. has been commingled with other property which cannot be divided without
12 difficulty;

13 the United States shall be entitled to forfeiture of substitute property pursuant to Title 18, United
14 States Code, Section 1963.

15 All pursuant to Title 50, United States Code, app Section 2410(g).

16 FORFEITURE ALLEGATION TWO: (Money Laundering Forfeiture) 18 U.S.C. § 982(a)(1)

17 47. The factual allegations contained in Counts Five through Eight of this Indictment
18 are re-alleged and by this reference fully incorporated herein for the purpose of alleging forfeiture
19 pursuant to the provisions of Title 18, United States Code, Section 982(a)(1).

20 48. Upon a conviction of any of the offenses alleged in Counts Five through Eight, the
21 defendants,

22 EVERTOP SERVICES,
23 MAJID KAKAVAND,
24 AMIR GHASEMI, and
ALEX RAMZI,

25 shall forfeit to the United States, pursuant to Title 18, United States Code, Section 982(a)(1), all
26 right, title, and interest in property, real and personal, involved in said violation.

27 49. If, as a result of any act or omission of the defendants, any of said property

- 28 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 which cannot be divided without difficulty;

the United States shall be entitled to forfeiture of substitute property pursuant to Title 21, United States Code, Section 853(p), as incorporated by Title 18, United States Code, Section 982(b)(1).

All in violation of Title 18, United States Code, Section 982.

FORFEITURE ALLEGATION THREE: (Forfeiture of Proceeds of Smuggled Goods)
18 U.S.C. § 981(a)(1)(C) and 28 U.S.C. § 2461(c)

50. The factual allegations contained in Counts Nine through Eleven of this Indictment are re-alleged and by this reference fully incorporated herein for the purpose of alleging forfeiture pursuant to the provisions of Title 18, United States Code, Section 981(a)(1)(C) and Title 28, United States Code, Section 2461(c).

51. Upon a conviction of any of the offenses alleged in Counts Nine through Eleven, the defendants,

EVERTOP SERVICES,
MAJID KAKAVAND,
AMIR GHASEMI, and
ALEX RAMZI,

shall forfeit to the United States, pursuant to Title 18, United States Code, Section 981(a)(1)(C) and Title 28, United States Code, Section 2461(c), any property constituting, or derived from proceeds obtained, directly or indirectly, as a result of the smuggling offenses.

52. If any of the property described above, 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 which cannot be divided without difficulty;

1 the United States shall be entitled to forfeiture of substitute property pursuant to Title
2 21, United States Code, Section 853(p), incorporated by Title 18, United States Code, Section
3 981(b) and Title 28, United States Code, Section 2461(c).

4 All pursuant to Title 18, United States Code, Section 981(a)(1)(C), and Title 28, United
5 Stated Code, Section 2461(c).

6 DATED:

A TRUE BILL.

7
8 4/7/09

Joseph P. Russoniello
9
10 FOREPERSON

11 JOSEPH P. RUSSONIELLO
12 United States Attorney

Brian J. Stretch
13 BRIAN J. STRETCH
14 Chief, Criminal Division

(Approved as to form: *CKelly*)
15 AUSA Kelly

AO 257 (Rev. 8/78)

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

BY: COMPLAINT INFORMATION INDICTMENT
 SUPERSEDING

OFFENSE CHARGED

See Attached Sheet

- Petty
- Minor
- Misdemeanor
- Felony

PENALTY:

See Attached Sheet

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

NORTHERN DISTRICT OF CALIFORNIA

SAN JOSE DIVISION

DEFENDANT - U.S.

▶ EVERTOP SERVICES SND BHD

DISTRICT COURT NUMBER

CR 09

0357 HRL

RMW

DEFENDANT

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

This report amends AO 257 previously submitted

PROCEEDING

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

United States Department of Commerce

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 JOSEPH P. RUSSONIELLO

U.S. Attorney Other U.S. Agency

Name of Assistant U.S. Attorney (if assigned)

CANDACE KELLY

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:

Δ 1

ATTACHMENT TO PENALTY SHEET

CRIMINAL VIOLATIONS AND MAXIMUM PENALTIES

EVERTOP SERVICES SND BHD

Count One Conspiracy to Export Goods Without a License: 50 U.S.C. §§ 1702 and 1705, and 31 C.F.R. Parts 560.203 and 560.204.

MAXIMUM PENALTIES: \$1,000,000 fine, 3 years of supervised release, \$100 special assessment

Counts Two through Four

Exporting Goods Without a License: 50 U.S.C. §§ 1702 and 1705, 31 C.F.R. Parts 560.203 and 560.204, and 18 U.S.C. § 2.

MAXIMUM PENALTIES: \$1,000,000 fine, 3 years of supervised release, \$100 special assessment.

Count Five

Conspiracy to Commit Money Laundering: 18 U.S.C. §§ 1956(a)(2)(A) and (h).

MAXIMUM PENALTIES: \$500,000 fine or twice the value of the monetary instrument involved in the transactions, 3 years of supervised release, \$100 special assessment

Counts Six Through Eight

Money Laundering: 18 U.S.C. §§ 1956(a)(2)(A) and 2.

MAXIMUM PENALTIES: \$500,000 fine or twice the value of the monetary instrument involved in the transactions, 3 years of supervised release \$100 special assessment

Counts Nine through Eleven

Smuggling Goods: 18 U.S.C. §§ 554 and 2.

MAXIMUM PENALTIES: \$250,000 fine, 3 years of supervised release, \$100 special assessment

Δ

Count Twelve

Conspiracy to Defraud the United States: 18 U.S.C. § 371.

MAXIMUM PENALTIES: \$250,000 fine, 3 years of supervised release, \$100 special assessment

Counts Thirteen through Fifteen

False Statements: 18 U.S.C. §§ 1001 and 2.

MAXIMUM PENALTIES: \$250,000 fine, 3 years of supervised release, \$100 special assessment

AO 257 (Rev. 6/78)

09 APR 11 11:00 AM
U.S. DISTRICT COURT
SAN JOSE, CA

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

SAN JOSE DIVISION

OFFENSE CHARGED

See Attached Sheet

- Petty
- Minor
- Misdemeanor
- Felony

PENALTY:

See Attached Sheet

DEFENDANT - U.S.

AMIR GHASEMI

DISTRICT COURT NUMBER

RMW

CR 09

0357

DEFENDANT

HRL

IS NOT IN CUSTODY

- 1) Has not been arrested, pending outcome this proceeding. 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

PROCEEDING

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

United States Department of Commerce

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 JOSEPH P. RUSSONIELLO

U.S. Attorney Other U.S. Agency

Name of Assistant U.S. Attorney (if assigned)

CANDACE KELLY

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: _____

A2

ATTACHMENT TO PENALTY SHEET

CRIMINAL VIOLATIONS AND MAXIMUM PENALTIES

AMIR GHASEMI

Count One Conspiracy to Export Goods Without a License: 50 U.S.C. §§ 1702 and 1705, and 31 C.F.R. Parts 560.203 and 560.204.

MAXIMUM PENALTIES: 20 years in prison, \$1,000,000 fine, 3 years of supervised release, \$100 special assessment

Counts Two through Four

Exporting Goods Without a License: 50 U.S.C. §§ 1702 and 1705, 31 C.F.R. Parts 560.203 and 560.204, and 18 U.S.C. § 2.

MAXIMUM PENALTIES: 20 years in prison, \$1,000,000 fine, 3 years of supervised release, \$100 special assessment

Count Five

Conspiracy to Commit Money Laundering: 18 U.S.C. §§ 1956(a)(2)(A) and (h).

MAXIMUM PENALTIES: 20 years in prison, \$500,000 fine or twice the value of the monetary instrument involved in the transactions, 3 years of supervised release, \$100 special assessment

Counts Six Through Eight

Money Laundering: 18 U.S.C. §§ 1956(a)(2)(A) and 2.

MAXIMUM PENALTIES: 20 years in prison, \$500,000 fine or twice the value of the monetary instrument involved in the transactions, 3 years of supervised release \$100 special assessment

Counts Nine through Eleven

Smuggling Goods: 18 U.S.C. §§ 554 and 2.

MAXIMUM PENALTIES: 10 years in prison, \$250,000 fine, 3 years of supervised release, \$100 special assessment

Count Twelve

Conspiracy to Defraud the United States: 18 U.S.C. § 371.

MAXIMUM PENALTIES: 5 years in prison, \$250,000 fine, 3 years of supervised release, \$100 special assessment

Counts Thirteen through Fifteen

False Statements: 18 U.S.C. §§ 1001 and 2.

MAXIMUM PENALTIES: 5 years in prison (8 years if the offense involves international or domestic terrorism), \$250,000 fine, 3 years of supervised release, \$100 special assessment

AO 257 (Rev. 6/78)

00 APR 11 11 53 AM '09
MAILED
FBI

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
SAN JOSE DIVISION

OFFENSE CHARGED

See Attached Sheet

- Petty
- Minor
- Misdemeanor
- Felony

PENALTY:

See Attached Sheet

DEFENDANT - U.S.

MAJID KAKAVAND

DISTRICT COURT NUMBER

RMW

CR 09 0357 HRL
DEFENDANT

PROCEEDING

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

United States Department of Commerce

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

This report amends AO 257 previously submitted

Name and Office of Person

Furnishing Information on this form JOSEPH P. RUSSONIELLO

U.S. Attorney Other U.S. Agency

Name of Assistant U.S. Attorney (if assigned)

CANDACE KELLY

ADDITIONAL INFORMATION OR COMMENTS

PROCESS:

SUMMONS NO PROCESS* WARRANT

if Summons, complete following:

Arraignment Initial Appearance

Defendant Address:

Bail Amount: _____

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

Date/Time: _____ Before Judge: _____

Comments:

Δ3

ATTACHMENT TO PENALTY SHEET
CRIMINAL VIOLATIONS AND MAXIMUM PENALTIES

MAJID KAKAVAND

Count One Conspiracy to Export Goods Without a License: 50 U.S.C. §§ 1702 and 1705, and 31 C.F.R. Parts 560.203 and 560.204.

MAXIMUM PENALTIES: 20 years in prison, \$1,000,000 fine, 3 years of supervised release, \$100 special assessment

Counts Two through Four

Exporting Goods Without a License: 50 U.S.C. §§ 1702 and 1705, 31 C.F.R. Parts 560.203 and 560.204, and 18 U.S.C. § 2.

MAXIMUM PENALTIES: 20 years in prison, \$1,000,000 fine, 3 years of supervised release, \$100 special assessment

Count Five

Conspiracy to Commit Money Laundering: 18 U.S.C. §§ 1956(a)(2)(A) and (h).

MAXIMUM PENALTIES: 20 years in prison, \$500,000 fine or twice the value of the monetary instrument involved in the transactions, 3 years of supervised release, \$100 special assessment

Counts Six Through Eight

Money Laundering: 18 U.S.C. §§ 1956(a)(2)(A) and 2.

MAXIMUM PENALTIES: 20 years in prison, \$500,000 fine or twice the value of the monetary instrument involved in the transactions, 3 years of supervised release \$100 special assessment

Counts Nine through Eleven

Smuggling Goods: 18 U.S.C. §§ 554 and 2.

MAXIMUM PENALTIES: 10 years in prison, \$250,000 fine, 3 years of supervised release, \$100 special assessment

Count Twelve

Conspiracy to Defraud the United States: 18 U.S.C. § 371.

MAXIMUM PENALTIES: 5 years in prison, \$250,000 fine, 3 years of supervised release, \$100 special assessment

Counts Thirteen through Fifteen

False Statements: 18 U.S.C. §§ 1001 and 2.

MAXIMUM PENALTIES: 5 years in prison (8 years if the offense involves international or domestic terrorism), \$250,000 fine, 3 years of supervised release, \$100 special assessment

AO 257 (Rev. 6/78)

FILED
APR 7 2009
FBI

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
SAN JOSE DIVISION

OFFENSE CHARGED
See Attached Sheet
 Petty
 Minor
 Misdemeanor
 Felony
PENALTY: See Attached Sheet

DEFENDANT - U.S.
ALEX RAMZI
DISTRICT COURT NUMBER
CR 09 0357
DEFENDANT

RMW
HRL

PROCEEDING
Name of Complainant Agency, or Person (& Title, if any)
United States Department of Commerce
 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 }

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 JOSEPH P. RUSSONIELLO
 U.S. Attorney Other U.S. Agency

Name of Assistant U.S. Attorney (if assigned) CANDACE KELLY

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:

DF

ATTACHMENT TO PENALTY SHEET

CRIMINAL VIOLATIONS AND MAXIMUM PENALTIES

ALEX RAMZI

Count One Conspiracy to Export Goods Without a License: 50 U.S.C. §§ 1702 and 1705, and 31 C.F.R. Parts 560.203 and 560.204.

MAXIMUM PENALTIES: 20 years in prison, \$1,000,000 fine, 3 years of supervised release, \$100 special assessment

Counts Two through Four

Exporting Goods Without a License: 50 U.S.C. §§ 1702 and 1705, 31 C.F.R. Parts 560.203 and 560.204, and 18 U.S.C. § 2.

MAXIMUM PENALTIES: 20 years in prison, \$1,000,000 fine, 3 years of supervised release, \$100 special assessment

Count Five

Conspiracy to Commit Money Laundering: 18 U.S.C. §§ 1956(a)(2)(A) and (h).

MAXIMUM PENALTIES: 20 years in prison, \$500,000 fine or twice the value of the monetary instrument involved in the transactions, 3 years of supervised release, \$100 special assessment

Counts Six Through Eight

Money Laundering: 18 U.S.C. §§ 1956(a)(2)(A) and 2.

MAXIMUM PENALTIES: 20 years in prison, \$500,000 fine or twice the value of the monetary instrument involved in the transactions, 3 years of supervised release \$100 special assessment

Counts Nine through Eleven

Smuggling Goods: 18 U.S.C. §§ 554 and 2.

MAXIMUM PENALTIES: 10 years in prison, \$250,000 fine, 3 years of supervised release, \$100 special assessment

Δ4

Count Twelve

Conspiracy to Defraud the United States: 18 U.S.C. § 371.

MAXIMUM PENALTIES: 5 years in prison, \$250,000 fine, 3 years of supervised release, \$100 special assessment

Counts Thirteen through Fifteen

False Statements: 18 U.S.C. §§ 1001 and 2.

MAXIMUM PENALTIES: 5 years in prison (8 years if the offense involves international or domestic terrorism), \$250,000 fine, 3 years of supervised release, \$100 special assessment