

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

- - - - - X

UNITED STATES OF AMERICA

: INDICTMENT

- v. -

: **12 CRIM 830**

ALIREZA MOAZAMI GOUDARZI,
a/k/a "Mikel Scofield,"
a/k/a "Saeed Ebrahimi,"
a/k/a "Sebastian Wilson,"
a/k/a "Richard Bocher,"
a/k/a "Mike Brown,"

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Defendant.

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COUNT ONE

(Conspiracy to Violate the International Emergency Economic Powers Act ("IEEPA"))

The Grand Jury charges:

1. From at least in or about October 2010, up to and including on or about October 24, 2012, in the Southern District of New York and elsewhere, ALIREZA MOAZAMI GOUDARZI, a/k/a "Mikel Scofield," a/k/a "Saeed Ebrahimi," a/k/a "Sebastian Wilson," a/k/a "Richard Bocher," a/k/a "Mike Brown," the defendant, and others known and unknown, unlawfully, willfully, and knowingly did combine, conspire, confederate, and agree together and with each other to violate, and to cause a violation of, licenses, orders, regulations, and prohibitions issued under the International Emergency Economic Powers Act, Title 50, United States Code, Sections 1701 to 1707 and Title 31, Code of Federal Regulations, Sections 560.203 and 560.204 (collectively, "IEEPA").

2. It was a part and an object of the conspiracy that ALIREZA MOAZAMI GOUDARZI, a/k/a "Mikel Scofield," a/k/a "Saeed Ebrahimi," a/k/a "Sebastian Wilson," a/k/a "Richard Bocher," a/k/a "Mike Brown," the defendant, and others known and unknown, would and did export, re-export, cause to be exported and re-exported, sell, and supply, directly and indirectly, from the United States, goods, technology, and services, to wit, aircraft parts supplied by companies in the United States, to customers located in Iran, without obtaining the required approval of the Office of Foreign Assets Control, within the United States Department of Treasury, in violation of Title 50, United States Code, Sections 1701 to 1707 and Title 31, Code of Federal Regulations, Sections 560.203 and 560.204.

Overt Acts

3. In furtherance of the conspiracy and to effect the illegal object thereof, ALIREZA MOAZAMI GOUDARZI, a/k/a "Mikel Scofield," a/k/a "Saeed Ebrahimi," a/k/a "Sebastian Wilson," a/k/a "Richard Bocher," a/k/a "Mike Brown," the defendant, and others known and unknown, committed the following overt acts, in the Southern District of New York and elsewhere:

a. In or about October 2010, GOUDARZI sent an email to a United States based supplier seeking to purchase United States goods in violation of the embargo on shipment of goods to Iran.

b. In or about February 2011, a coconspirator not named as a defendant herein ("CC-1") wired approximately \$3,500 from a bank located in the United Kingdom to an undercover bank account located in Manhattan, New York in order to purchase certain aircraft parts.

c. In or about May 2011, CC-1 communicated via email and telephone with a law enforcement agent acting in an undercover capacity who represented himself to be an aircraft parts supplier regarding purchasing parts for an attack helicopter.

d. On or about August 2, 2012, GOUDARZI sent an email to a law enforcement agent acting in an undercover capacity who represented himself to be an aircraft parts supplier regarding purchasing parts for a J85-21 engine.

e. In or about September 2012, GOUDARZI caused approximately \$1,500 to be wired from a bank located in the United Kingdom to an undercover bank account located in Manhattan, New York in order to purchase certain aircraft parts.

f. On or about October 24, 2012, in Kuala Lumpur, Malaysia, GOUDARZI met with a law enforcement agent acting in an undercover capacity who represented himself to be an aircraft parts supplier in order for GOUDARZI to purchase parts for a J85-21 engine.

(Title 50, United States Code, Section 1705)

COUNT TWO

(Conspiracy to Violate the Arms Export Control Act ("AECA"))

The Grand Jury further charges:

4. From at least in or about October 2010, up to and including on or about October 24, 2012, in the Southern District of New York and elsewhere, ALIREZA MOAZAMI GOUDARZI, a/k/a "Mikel Scofield," a/k/a "Saeed Ebrahimi," a/k/a "Sebastian Wilson," a/k/a "Richard Bocher," a/k/a "Mike Brown," the defendant, and others known and unknown, willfully and knowingly combined, conspired, confederated, and agreed together and with each other to commit offenses against the United States, to wit, to violate Title 22, United States Code, Sections 2778(b)(2) and (c), and Title 22, Code of Federal Regulations, Sections 120.17 and 121.1.

5. It was a part and an object of the conspiracy that ALIREZA MOAZAMI GOUDARZI, a/k/a "Mikel Scofield," a/k/a "Saeed Ebrahimi," a/k/a "Sebastian Wilson," a/k/a "Richard Bocher," a/k/a "Mike Brown," the defendant, and others known and unknown, would and did export and cause to be exported from the United States defense articles designated on the United States Munitions List without having first obtained a license or other written authorization for such export from the Department of State, in violation of Title 22, United States Code, Sections 2778(b)(2) and (c), and Title 22, Code of Federal Regulations, Sections 120.17 and 121.1.

Overt Acts

6. In furtherance of the conspiracy and to effect the illegal object thereof, ALIREZA MOAZAMI GOUDARZI, a/k/a "Mikel Scofield," a/k/a "Saeed Ebrahimi," a/k/a "Sebastian Wilson," a/k/a "Richard Bocher," a/k/a "Mike Brown," the defendant, and others known and unknown, committed the overt acts listed in paragraphs 3(c)-(f), above, in the Southern District of New York and elsewhere.

(Title 18, United States Code, Section 371.)

COUNT THREE
(Attempt to Violate AECA)

The Grand Jury further charges:

7. From in or about August 2012, up to and including on or about October 24, 2012, in the Southern District of New York and elsewhere, ALIREZA MOAZAMI GOUDARZI, a/k/a "Mikel Scofield," a/k/a "Saeed Ebrahimi," a/k/a "Sebastian Wilson," a/k/a "Richard Bocher," a/k/a "Mike Brown," the defendant, wilfully and knowingly did attempt to export and cause to be exported from the United States components, parts, accessories, attachments, and associated equipment specifically designed or modified for military aircraft engines; to wit, GOUDARZI attempted to export parts for J85-21 military aircraft engines from the United States to Malaysia, for the purpose of conveying them to Iran, without having first obtained a license or other written authorization for such export from the Department of

State.

(Title 22, United States Code, Sections 2778(b)(2) and (c),
and Title 22, Code of Federal Regulations,
Sections 120.17 and 121.1.)

COUNT FOUR
(Conspiracy to Commit Money Laundering)

The Grand Jury further charges:

8. From at least in or about October 2010, up to and including on or about October 24, 2012, in the Southern District of New York and elsewhere, ALIREZA MOAZAMI GOUDARZI, a/k/a "Mikel Scofield," a/k/a "Saeed Ebrahimi," a/k/a "Sebastian Wilson," a/k/a "Richard Bocher," a/k/a "Mike Brown," the defendant, and others known and unknown, intentionally and knowingly did combine, conspire, confederate, and agree together and with each other to violate Title 18, United States Code, Section 1956(a)(2)(A).

9. It was a part and an object of the conspiracy that ALIREZA MOAZAMI GOUDARZI, a/k/a "Mikel Scofield," a/k/a "Saeed Ebrahimi," a/k/a "Sebastian Wilson," a/k/a "Richard Bocher," a/k/a "Mike Brown," the defendant, and others known and unknown, would and did transport, transmit, and transfer, and attempt to transport, transmit, and transfer, a monetary instrument and funds to a place in the United States from or through a place outside the United States with the intent to promote the carrying on of specified unlawful activity, to wit, export control violations involving violations of the Iranian Transaction

Regulations ("ITR"), 31 C.F.R. Part 560, and shipment of items controlled on the United States Munitions List established under section 38 of the Arms Export Control Act, Title 22, United States Code, Section 2778.

(Title 18, United States Code, Section 1956(h).)

COUNT FIVE
(Money Laundering)

The Grand Jury further charges:

10. On or about February 2, 2011, in the Southern District of New York and elsewhere, ALIREZA MOAZAMI GOUDARZI, a/k/a "Mikel Scofield," a/k/a "Saeed Ebrahimi," a/k/a "Sebastian Wilson," a/k/a "Richard Bocher," a/k/a "Mike Brown," the defendant, did transport, transmit, and transfer, and attempt to transport, transmit, and transfer, a monetary instrument and funds to a place in the United States from or through a place outside the United States, or did cause another so to do, with the intent to promote the carrying on of specified unlawful activity, to wit, GOUDARZI caused \$3,500 to be sent via wire transfer from the United Kingdom to Manhattan, New York in order to purchase goods for shipment to Iran in violation of the International Emergency Economic Powers Act, Title 50, United States Code, Sections 1701 to 1707, and the Iranian Transaction Regulations ("ITR"), 31 C.F.R. Part 560.

(Title 18, United States Code, Sections 1956(a)(2)(A) and 2)

COUNT SIX
(Money Laundering)

The Grand Jury further charges:

11. On or about September 5, 2012, in the Southern District of New York and elsewhere, ALIREZA MOAZAMI GOUDARZI, a/k/a "Mikel Scofield," a/k/a "Saeed Ebrahimi," a/k/a "Sebastian Wilson," a/k/a "Richard Bocher," a/k/a "Mike Brown," the defendant, did transport, transmit, and transfer, and attempt to transport, transmit, and transfer, a monetary instrument and funds to a place in the United States from or through a place outside the United States, or did cause another so to do, with the intent to promote the carrying on of specified unlawful activity, to wit, GOUDARZI caused \$1,500 to be sent via wire transfer from the United Kingdom to Manhattan, New York in order to purchase goods controlled on the United States Munitions List for shipment to Iran in violation of the International Emergency Economic Powers Act, Title 50, United States Code, Sections 1701 to 1707, the Iranian Transaction Regulations ("ITR"), 31 C.F.R. Part 560, and the Arms Export Control Act, Title 22, United States Code, Section 2778.

(Title 18, United States Code, Sections 1956(a)(2)(A) and 2)

FORFEITURE ALLEGATION

12. As a result of committing the IEEPA and AECA offenses charged in Counts One, Two, and Three of this Indictment, ALIREZA MOAZAMI GOUDARZI, a/k/a "Mikel Scofield,"

a/k/a "Saeed Ebrahimi," a/k/a "Sebastian Wilson," a/k/a "Richard Bocher," a/k/a "Mike Brown," the defendant, 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, all property that constitutes or is derived from proceeds traceable to the commission of the offenses charged in Counts One, Two, and Three.

13. As a result of committing the money laundering offenses charged in Counts Four, Five, and Six of this Indictment, ALIREZA MOAZAMI GOUDARZI, a/k/a "Mikel Scofield," a/k/a "Saeed Ebrahimi," a/k/a "Sebastian Wilson," a/k/a "Richard Bocher," a/k/a "Mike Brown," the defendant, shall forfeit to the United States, pursuant to Title 18, United States Code, Section 982(a)(1), all property, real and or personal, involved in such offenses, and any property traceable to such property.

Substitute Assets Provision

14. If any of the forfeitable property described in paragraphs 12 and 13 above, as a result of any act or omission of the defendant:

- 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 subdivided without difficulty;

it is the intent of the United States, pursuant to Title 18, United States Code, Section 982(b), Title 21, United States Code, Section 853(p), and Title 28, United States Code, Section 2461, to seek forfeiture of any other property of said defendant up to the value of the above forfeitable property.

(Title 18, United States Code, Sections 981(a)(1)(c) and 982(a)(1) and (b); Title 21, United States Code, Section 853; and Title 28, United States Code, Section 2461.)



PREET BHARARA
United States Attorney

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Defendant.

INDICTMENT

12 Cr.

(18 U.S.C. §§ 2, 371, 1956;
22 U.S.C. § 2778(b)(2) and (c);
50 U.S.C. § 1705;
22 C.F.R. §§ 120.17 and 121.1;
31 C.F.R. §§ 560.203, 560.204.)

PREET BHARARA
United States Attorney.
