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REDACTED

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

UNITED STATES OF AMERICA,

Plaintiff,

v.

AMIR HOSSEIN ARDEBILI,

a/k/a Amir Ahkami,

a/k/a Alex Dave

Defendant.

: **REDACTED**
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: Cr. A. No. 07-155
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INDICTMENT

The Grand Jury for the District of Delaware charges that:

COUNT I

From in or about May, 2006, to on or about October 2, 2007, in the District of Delaware and elsewhere, defendant **Amir Hossein Ardebili, a/k/a Amir Ahkami, a/k/a Alex Dave,** knowingly and willfully attempted to export from the United States to the Islamic Republic of Iran, and caused the attempted sale to the Islamic Republic of Iran, and caused the attempted supply to the Islamic Republic of Iran of MAPCGM0003 micro-chip phase shifters, without the required authorization from the Office of Foreign Asset Control, Department of the Treasury, having first been obtained, in violation of Title 50, United States Code, Sections 1702 and 1705(b), and Title 18, United States Code, Section 2, and Title 31, Code of Federal Regulations, Section 560.

COUNT II

On or about July 25, 2007, in the District of Delaware, defendant **Amir Hossein Ardebili, a/k/a Amir Ahkami, a/k/a Alex Dave,** did knowingly and willfully transmit and

transfer funds, that is, \$2,980, from a place outside the United States, that is the Islamic Republic of Iran, to a place in the United States, that is Delaware, with the intent to promote the carrying on of specified unlawful activity, that is, the attempt to export from the United States to the Islamic Republic of Iran, and causing the attempted sale to, and causing the attempted supply to the Islamic Republic of Iran of MAPCGM0003 micro-chip phase shifters, in violation of Title 18, United States Code, Sections 1956(a)(2)(A) and 2.

COUNT III

From in or about May 2006, to on or about October 2, 2007, in the District of Delaware and elsewhere, defendant **Amir Hossein Ardebili**, a/k/a Amir Ahkami, a/k/a Alex Dave, knowingly and willfully attempted to export and send, and attempted to cause the export from the United States to the Islamic Republic of Iran, MAPCGM0003 micro-chip phase shifters, without the required authorization from the Office of Foreign Asset Control, Department of the Treasury, having first been obtained, in violation of Title 50, United States Code, Sections 1702 and 1705(b), and Title 18, United States Code, Section 2, and Title 31, Code of Federal Regulations, Section 560, all in violation of Title 18, United States Code, Sections 554 and 2.

COUNT IV

From in or about May, 2006, to on or about October 2, 2007, in the District of Delaware and elsewhere, defendant **Amir Hossein Ardebili**, a/k/a Amir Ahkami, a/k/a Alex Dave, did knowingly and willfully attempt to export from the United States to the Islamic Republic of Iran, and cause the attempted sale to the Islamic Republic of Iran, and cause the attempted supply to the Islamic Republic of Iran of Digital Air Data Computers (DADC-107), without the required authorization from the Office of Foreign Asset Control, Department of the Treasury, having first been obtained, in violation of Title 50, United States Code, Sections 1702 and 1705(b), and Title

18, United States Code, Section 2, and Title 31, Code of Federal Regulations, Section 560.

COUNT V

From in or about May 2006, to on or about October 2, 2007, in the District of Delaware and elsewhere, defendant **Amir Hossein Ardebili, a/k/a Amir Ahkami, a/k/a Alex Dave**, knowingly and willfully attempted to export and attempted to cause the export from the United States to the Islamic Republic of Iran, a defense article, that is, Digital Air Data Computers (DADC-107), which is designated as a defense article on the United States Munitions List, without the required license or written authorization from the Department of State, Directorate of Defense Trade Control, having first been obtained for such export, in violation of Title 22, United States Code, Sections 2778 (b)(2) and 2778(c), and Title 18, United States Code, Section 2, and Title 22, Code of Federal Regulations, Sections 121.1, 123.1, and 127.1(a)(1).

COUNT VI

From in or about May 2006, to on or about October 2, 2007, in the District of Delaware and elsewhere, defendant **Amir Hossein Ardebili, a/k/a Amir Ahkami, a/k/a Alex Dave**, knowingly and willfully attempted to export and send, and attempted to cause the export from the United States to the Islamic Republic of Iran, Digital Air Data Computers (DADC-107), which is designated as a defense article on the United States Munitions List, without the required license or written authorization from the Department of State, Directorate of Defense Trade Control, having first been obtained for such export, in violation of Title 22, United States Code, Sections 2778 (b)(2) and 2778(c), and Title 22, Code of Federal Regulations, Sections 121.1, 123.1, and 127.1(a)(1), all in violation of Title 18, United States Code, Sections 554 and 2.

COUNT VII

From in or about May 2006, to on or about October 2, 2007, in the District of Delaware and

elsewhere, defendant **Amir Hossein Ardebili, a/k/a Amir Ahkami, a/k/a Alex Dave**, did knowingly and intentionally combine, conspire and confederate and agree with others both known and unknown to knowingly and willfully export and attempt to export, and cause to export from the United States to the Islamic Republic of Iran, MAPCGM0003 micro-chip phase shifters, without the required authorization from the Office of Foreign Asset Control, Department of the Treasury, having first been obtained, in violation of Title 50, United States Code, Sections 1702 and 1705(b), and Title 18, United States Code, Section 2, and Title 31, Code of Federal Regulations, Section 560, and Title 18, United States Code, Section 554(a). In furtherance of the conspiracy and to achieve the objects thereof, the defendant **Amir Hossein Ardebili, a/k/a Amir Ahkami, a/k/a Alex Dave**, committed and caused to be committed the following overt act, among others, in the District of Delaware and elsewhere: on or about July 25, 2007, the defendant did knowingly transmit and transfer funds, that is, \$2,980, from the Islamic Republic of Iran to the United States.

All in violation of Title 18 United States Code, Section 371.

COUNT VIII

From in or about May 2006, to on or about October 2, 2007, in the District of Delaware and elsewhere, defendant **Amir Hossein Ardebili, a/k/a Amir Ahkami, a/k/a Alex Dave**, did knowingly and intentionally combine, conspire and confederate and agree with others both known and unknown to knowingly and willfully export and attempt to export from the United States to the Islamic Republic of Iran, a defense article, that is Digital Air Data Computers (DADC-107), which is designated as a defense article on the United States Munitions List, without the required license or written authorization from the Department of State, Directorate of Defense Trade Control, having first been obtained for such export, in violation of Title 22, United States Code,

Sections 2778(b)(2) and 2778(c), Title 22, Code of Federal Regulations, Sections 121.1, 123.1, and 127.1(a)(1), and Title 18, United States Code, Section 554. In furtherance of the conspiracy and to achieve the objects thereof, the defendant **Amir Hossein Ardebili, a/k/a Amir Ahkami, a/k/a Alex Dave**, committed and caused to be committed the following overt act, among others, in the District of Delaware and elsewhere: on or about October 1, 2007, the defendant did knowingly travel to Tbilisi, Republic of Georgia.

All in violation of Title 18 United States Code, Section 371.

COUNT IX

From in or about May 2006, to on or about October 2, 2007, in the District of Delaware and elsewhere, defendant **Amir Hossein Ardebili, a/k/a Amir Ahkami, a/k/a Alex Dave**, did knowingly and intentionally combine, conspire and confederate and agree with others both known and unknown to knowingly and willfully export and attempt to export from the United States to the Islamic Republic of Iran, Digital Air Data Computers (DADC-107), without the required authorization from the Office of Foreign Asset Control, Department of the Treasury, having first been obtained, in violation of Title 50, United States Code, Sections 1702 and 1705(b), and Title 18, United States Code, Section 2, and Title 31, Code of Federal Regulations, Section 560, and Title 18, United States Code, Section 554. In furtherance of the conspiracy and to achieve the objects thereof, the defendant **Amir Hossein Ardebili, a/k/a Amir Ahkami, a/k/a Alex Dave**, committed and caused to be committed the following overt act, among others, in the District of

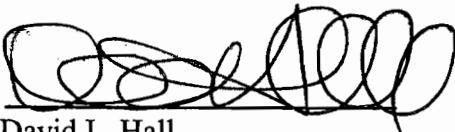
Delaware and elsewhere: on or about October 1, 2007, the defendant did knowingly travel to Tbilisi, Republic of Georgia.

All in violation of Title 18 United States Code, Section 371.

A TRUE BILL:

Foreperson

COLM F. CONNOLLY
United States Attorney

By: 
David L. Hall
Assistant United States Attorney

Dated: November 15, 2007

to the indictment in this case.
to the indictment in this case.
to the indictment in this case.
to the indictment in this case.

Dated this _____ day of _____, 2007.

Def.

Clerk