

# United States District Court For The District of Columbia

UNITED STATES OF AMERICA

CRIMINAL COMPLAINT

V.

**HOSSEIN ALI KHOSHNEVISRAD** (DOB: 8/11/1953)  
a/k/a HASSAN ALI KHOSHNEVISRAD,  
a/k/a HOSSEIN ALI KHOSHNEVIS

CASE NUMBER: 08 - 483 11 011

(Name and Address of Defendant)

I, the undersigned complainant being duly sworn state the following is true and correct to the best of my knowledge and belief. From in or about November 2006 through in or about March 2008 in the District of Columbia and elsewhere, the defendant did commit the following four (4) criminal offenses, which are set forth in Attachment A and made a part hereof, (Track Statutory Language of Offense)

**See Attachment A,**

in violation of Title 50, United States Code, Section 1705; Title 31, Code of Federal Regulations, Section 560.204 and Title 18, United States Code, Section 2.

I further state that I am Special Agent David J. Poole, Office of Export Enforcement, U.S. Department of Commerce, and that this complaint is based on the following facts:

**See Attached Affidavit**

Continued on the attached sheet and made a part hereof:

Yes  No

  
AUSA, Denise Cheung (202) 307-2845

Sworn to before me and subscribed in my presence,



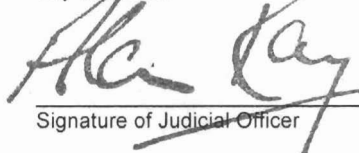
Signature of Complainant  
David J. Poole, Special Agent  
Office of Export Enforcement  
U.S. Department of Commerce

August 1, 2008  
Date

at Washington, D.C.  
City and State

**ALAN KAY**  
**U.S. MAGISTRATE JUDGE**

Name & Title of Judicial Officer

  
Signature of Judicial Officer

**Count One – Unlawful Export of U.S. Goods to Iran**

From in or about November 2006 through in or about March 2008 in the District of Columbia and elsewhere, **HOSSEIN ALI KHOSNEVISRAD a/k/a HASSAN ALI KHOSHNEVISRAD a/k/a HOSSEIN ALI KHOSHNEVIS** did willfully violate the Iranian Transactions Regulations (31 C.F.R. § 560.204), issued under the International Emergency Economic Powers Act, by exporting, selling, and supplying goods and by causing the export, sale, and supply of goods -- without a license or authorization obtained from the Office of Foreign Assets Control, U.S. Department of Treasury, located in Washington, D.C. -- from the United States to Iran and the Government of Iran, including helicopter engines in violation of Title 50, United States Code, Section 1705; Title 31, Code of Federal Regulations, Section 560.204; and Title 18, United States Code, Section 2.

**Count Two– Conspiracy to Unlawfully Export U.S. Goods to Iran**

From in or about November 2006 through in or about March 2008 in the District of Columbia and elsewhere, **HOSSEIN ALI KHOSNEVISRAD a/k/a HASSAN ALI KHOSHNEVISRAD a/k/a HOSSEIN ALI KHOSHNEVIS** did willfully conspire to violate regulations, the Iranian Transactions Regulations (31 C.F.R. § 560.204), issued under the International Emergency Economic Powers Act, by exporting, selling, and supplying goods and by causing the export, sale, and supply of goods -- without a license or authorization obtained from the Office of Foreign Assets Control, U.S. Department of Treasury, located in Washington, D.C. -- from the United States to Iran and the Government of Iran, including helicopter engines in violation of Title 50, United States Code, Section 1705; Title 31, Code of Federal Regulations, Section 560.204; and Title 18, United States Code, Section 2.

**Count Three – Unlawful Export of U.S. Goods to Iran**

From in or about April 19, 2006, through in or about February 2 2007 in the District of Columbia and elsewhere, **HOSSEIN ALI KHOSNEVISRAD a/k/a HASSAN ALI KHOSHNEVISRAD a/k/a HOSSEIN ALI KHOSHNEVIS** did willfully conspire to violate the Iranian Transactions Regulations (31 C.F.R. § 560.204), issued under the International Emergency Economic Powers Act, by exporting, selling, and supplying goods and by causing the export, sale, and supply of goods -- without a license or authorization obtained from the Office of Foreign Assets Control, U.S. Department of Treasury, located in Washington, D.C. -- from the United States to Iran and the Government of Iran, namely aerial cameras, in violation of Title 50, United States Code, Section 1705; Title 31, Code of Federal Regulations, Section 560.204; and Title 18, United States Code, Section 2.

#### **Count Four – Conspiracy to Unlawfully Export U.S. Goods to Iran**

From in or about April 19, 2006, through in or about February 2 2007 in the District of Columbia and elsewhere, **HOSSEIN ALI KHOSNEVISRAD a/k/a HASSAN ALI KHOSHNEVISRAD a/k/a HOSSEIN ALI KHOSHNEVIS** did willfully conspire to violate the Iranian Transactions Regulations (31 C.F.R. § 560.204), issued under the International Emergency Economic Powers Act, by exporting, selling, and supplying goods and by causing the export, sale, and supply of goods -- without a license or authorization obtained from the Office of Foreign Assets Control, U.S. Department of Treasury, located in Washington, D.C. -- from the United States to Iran and the Government of Iran, namely aerial cameras, in violation of Title 50, United States Code, Section 1705; Title 31, Code of Federal Regulations, Section 560.204; and Title 18, United States Code, Sections 371 and 2.