

AAS:MAA  
F. #2021R00963

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NEW YORK  
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UNITED STATES OF AMERICA

I N D I C T M E N T

- against -

Cr. No. 1:22-cr-00033(EK)(MMH)  
(T. 50, U.S.C., §§ 1705(a) and 1705(c);  
T. 18, U.S.C., §§ 981(a)(1)(C) and  
3551 et seq.; T. 21, U.S.C., § 853(p); T.  
28, U.S.C., § 2461(c))

KAMBIZ ATTAR KASHANI,  
  
Defendant.

-----X

THE GRAND JURY CHARGES:

CONSPIRACY TO VIOLATE THE  
INTERNATIONAL EMERGENCY ECONOMIC POWERS ACT

1. In or about and between February 2019 and June 2021, both dates being approximate and inclusive, within the Eastern District of New York and elsewhere, the defendant KAMBIZ ATTAR KASHANI, together with others, did knowingly and willfully conspire to cause the export, re-export, sale and supply, directly and indirectly, of goods, technology and services, to wit: two subscriptions to a proprietary computer software program; several fixed attenuators; two subscriptions to operating software; six power supplies; and several storage systems, from the United States to Iran and the Government of Iran, without having first obtained the required licenses or other authorization from the U.S. Department of the Treasury’s Office of Foreign Assets Control, contrary to Title 50, United States Code, Section 1705 and Title 31, Code of Federal Regulations, Sections 560 et seq.

(Title 50, United States Code, Sections 1705(a) and 1705(c); Title 18, United States Code, Sections 3551 et seq.)

CRIMINAL FORFEITURE ALLEGATION

2. The United States hereby gives notice to the defendant that, upon his conviction of the offense charged herein, the government will seek forfeiture in accordance with Title 18, United States Code, Section 981(a)(1)(C) and Title 28, United States Code, Section 2461(c), which require any person convicted of such offense to forfeit any property, real or personal, constituting, or derived from, proceeds obtained directly or indirectly as a result of such offense.

3. If any of the above-described forfeitable property, 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

divided without difficulty;

it is the intent of the United States, pursuant to Title 21, United States Code, Section 853(p),

to seek forfeiture of any other property of the defendant up to the value of the forfeitable property described in this forfeiture allegation.

(Title 18, United States Code, Section 981(a)(1)(C); Title 21, United States Code, Section 853(p); Title 28, United States Code, Section 2461(c))

A TRUE BILL

  
\_\_\_\_\_  
FOREPERSON

  
\_\_\_\_\_  
BREON PEACE  
UNITED STATES ATTORNEY  
EASTERN DISTRICT OF NEW YORK

F#: 2021R00963  
FORM DBD-34  
JUN. 85

No. \_\_\_\_\_

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**UNITED STATES DISTRICT COURT**

EASTERN *District of* NEW YORK

CRIMINAL DIVISION

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THE UNITED STATES OF AMERICA

vs.

KAMBIZ ATTAR KASHANI,

Defendant.

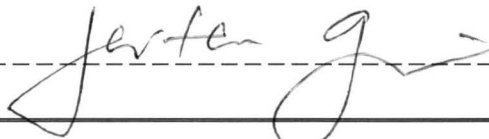
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**INDICTMENT**

(T. 50, U.S.C. §§ 1705(a) and 1705(c); T. 18, U.S.C. §§ 981(a)(1)(C) and 3551 et seq.; T. 21, U.S.C. § 853(p); T. 28, U.S.C. § 2461(c))

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*A true bill.*



Foreperson

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Filed in open court this \_\_\_\_\_ day,

of \_\_\_\_\_ A.D. 20 \_\_\_\_\_

Clerk

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Bail, \$ \_\_\_\_\_

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*Alexander A. Solomon and Meredith A. Arfa,  
Assistant U.S. Attorneys (718) 254-7000*

**INFORMATION SHEET**

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NEW YORK

- 1. Title of Case: United States v. Kambiz Attar Kashani
- 2. Related Magistrate Docket Number(s): N/A 1:22-mj-00031-VMS-2
- 3. Arrest Date: 1/13/2022 **1:22-cr-00033(EK)(MMH)**
- 4. Nature of offense(s):  Felony  
 Misdemeanor
- 5. Related Cases - Title and Docket No(s). (Pursuant to Rule 50.3.2 of the Local E.D.N.Y. Division of Business Rules): N/A
- 6. Projected Length of Trial: Less than 6 weeks   
More than 6 weeks
- 7. County in which crime was allegedly committed: Kings County  
(Pursuant to Rule 50.1(d) of the Local E.D.N.Y. Division of Business Rules)
- 8. Was any aspect of the investigation, inquiry and prosecution giving rise to the case pending or initiated before March 10, 2012.<sup>1</sup>  Yes  No
- 9. Has this indictment/information been ordered sealed?  Yes  No
- 10. Have arrest warrants been ordered?  Yes  No
- 11. Is there a capital count included in the indictment?  Yes  No

BREON PEACE  
United States Attorney

By: /s/ Meredith A. Arfa  
Meredith A. Arfa  
Assistant U.S. Attorney  
(718) 254-6025

<sup>1</sup> Judge Brodie will not accept cases that were initiated before March 10, 2012.