



4. Pursuant to that authority, the Department of Commerce (“DOC”) reviews and controls the export of certain items, including commodities, software, and technologies, from the United States to foreign countries through the Export Administration Regulations (“EAR”), 15 C.F.R. §§ 730-774. In particular, the EAR restrict the export of items that could make a significant contribution to the military potential of other nations or that could be detrimental to the foreign policy or national security of the United States. The EAR impose licensing and other requirements for items subject to the EAR to be lawfully exported from the United States or lawfully re-exported from one foreign destination to another. “Export” is defined in the EAR as an “actual shipment or transmission out of the United States.” 15 C.F.R. § 734.13(a)(1).

5. The most sensitive items subject to EAR controls are identified on the Commerce Control List, or “CCL,” published at 15 C.F.R. part 774, Supp. No. 1. Items on the CCL are categorized by Export Control Classification Number (“ECCN”), each of which has export control requirements depending on destination, end use, and end user.

6. Pursuant to ECRA, “[i]t shall be unlawful for a person to violate, attempt to violate, conspire to violate, or cause a violation of this part or of any regulation, order, license, or other authorization issued under this part,” and, “[a] person who willfully commits, willfully attempts to commit, or willfully conspires to commit, or aids or abets in the commission of, an unlawful act described in subsection (a) shall” be guilty of a crime. 50 U.S.C. § 4819.

7. At all times relevant to this indictment, rifle barrels for automatic and semi-automatic rifles chambered in .50 caliber and smaller were subject to the EAR and classified as 0A501.c and cannot be exported from the United States without a license or written approval from the United States Government.

8. Defendant did not apply for or obtain an export license from the DOC to export firearm components listed on the CCL.

COUNT 1

(Smuggling Goods From the United States, 18 U.S.C. § 554)

The Grand Jury charges:

9. The factual allegations of Paragraphs 1 through 8 of this Indictment are realleged and incorporated by reference herein.

10. On or about and between April 1, 2022, to the date of Indictment, in the Northern District of Ohio, Defendant ABDULRAHMAN ZALAH did willfully, knowingly and fraudulently export and attempt to export and send more than fifty rifle barrels for automatic and semi-automatic rifles chambered in .50 caliber and smaller from the United States, contrary to the Export Control Reform Act (ECRA), 50 U.S.C. §§ 2801-4852, and the Export Administration Regulations (EAR), 15 C.F.R. §§ 730-744, a law and regulation of the United States, in violation of Title 18, United States Code, Section 554 to the Kingdom of Saudi Arabia.

A TRUE BILL.

Original document - Signatures on file with the Clerk of Courts, pursuant to the E-Government Act of 2002.