

UNITED STATES DISTRICT COURT

for the

Northern District of Ohio

FILED  
2017 JAN 13 PM 2:13

United States of America )

v. )

PARISA MOHAMADI, )  
aka "PARISA JAVIDI", )  
)  
)  
)  
)  
)

Case No.

CLERK U.S. DISTRICT COURT  
NORTHERN DISTRICT OF OHIO  
CLEVELAND  
1:17MJ4003

Defendant(s)

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of April 2011 to April 2012 in the county of Cuyahoga in the Northern District of Ohio, and elsewhere, the defendant(s) violated:

*Code Section*

*Offense Description*

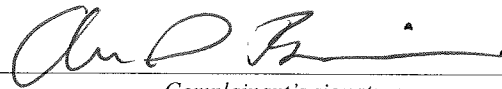
Title 50, United States Code,  
Section 1705(a) and (c) and 31  
C.F.R. Sections 560.203 and  
560.204

Conspiracy to Violate International Emergency Economic Powers Act

This criminal complaint is based on these facts:

SEE ATTACHED AFFIDAVIT

Continued on the attached sheet.



Complainant's signature

Aaron D. Burdine, Special Agent

Printed name and title

Sworn to before me and signed in my presence.

Date: 1-13-17



Judge's signature

City and state: Cleveland, Ohio

Jonathan D. Greenberg, U.S. Magistrate Judge

Printed name and title

1:17 MJ 4003

UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF OHIO

**AFFIDAVIT IN SUPPORT OF  
A CRIMINAL COMPLAINT**

1. I, Aaron D. Burdine, being duly sworn, depose and say:

2. I am a Special Agent with the U.S. Department of Homeland Security, Immigration and Customs Enforcement, Homeland Security Investigations (HSI), having served in that capacity for approximately fourteen years, to include its predecessor agency, the United States Customs Service. I am currently assigned to Homeland Security Investigations, Cleveland, Ohio (HSI Cleveland). I have received training, participated in and conducted investigations involving the violation of laws pertaining to the illegal export of goods, technology and services to Iran including violations pertaining to the International Emergency Economic Powers Act, 50 U.S.C. §§ 1701 & 1705, Aiding and Abetting, and Causing an Act to be Done, 18 U.S.C. § 2, False Statements, 18 U.S.C. § 1001, Smuggling Goods from the United States, 18 U.S.C. § 554, Submission of False or Misleading Information, 13 U.S.C. § 305, Prohibited Exportation, Reexportation, Sale or Supply of Goods, Technology, or Services to Iran, 31 C.F.R. Part 560, and Conspiracy, 18 U.S.C. § 371.

3. The statements in this affidavit are based in part on my personal investigation of this matter, as well as on information provided by other law enforcement agents. Because this affidavit is being submitted for the limited purpose of securing an arrest warrant, I have not included each and every fact known to me concerning this investigation. I have set forth only those facts that I believe are necessary to establish probable cause to believe PARISA

MOHAMADI has committed a violation of Title 50, United States Code, Section 1705(a) and (c) and 31 C.F.R. Sections 560.203 and 560.204, Conspiracy to Violate the International Emergency Economic Powers Act.

4. Beginning as early as in or about April 2011, the exact date being unknown, and continuing through at least in or about April 2012, in the Northern District of Ohio, Eastern Division, and elsewhere, MOHAMADI did knowingly and willfully combine, conspire, confederate, and agree with others known and unknown, to export and cause the exportation of goods from the United States and elsewhere to Iran in violation of the embargo imposed upon that country by the United States, without having first obtained the required licenses or authorizations from the Office of Foreign Assets Control, United States Department of Treasury, in violation of Title 50, United States Code, Section 1705(a) and (c) and 31 C.F.R. Sections 560.203 and 560.204.

5. MOHAMADI and her co-conspirators sought to accomplish the objects of the conspiracy through the following: MOHAMADI and others received orders from customers in Iran for specific products to be used in manufacturing, in the oil and gas industry and industries unknown; MOHAMADI and others intentionally failed to disclose or concealed that an Iranian customer was the true recipient of the products exported from the United States, Canada and other countries; in order to conceal from the United States government that materials were being sold to customers in Iran, MOHAMADI and others did purposefully and willfully falsely state or cause to be falsely stated that the United Arab Emirates (UAE) was the final end destination for goods ultimately destined for Iran; and MOHAMADI and others sold products to individuals

and entities in Iran without obtaining a license from the Office of Foreign Assets Control, United States Department of Treasury.

#### Background

6. Parisa MOHAMADI, aka Parisa Javidi (hereinafter "MOHAMADI"), is a naturalized U.S. Citizen, but was born in Iran. MOHAMADI has claimed both U.S. and Dutch citizenship. Record checks revealed MOHAMADI has had a U.S. address located in Calabasas, California and foreign addresses located in Amstelveen, Netherlands, Muscat, Oman and the United Arab Emirates (UAE). MOHAMADI has traveled under and been in possession of passports issued from Iran, the Netherlands, and the United States. According to analysis of MOHAMADI's emails and of government databases, MOHAMADI has an extensive international travel history, including travel into and out of Iran. MOHAMADI last traveled to the United States in or around April 2013. MOHAMADI has had numerous foreign bank accounts in multiple countries, including The Netherlands, the UAE, the United States, Azerbaijan, and Oman.

7. Intelligent Solutions FZCO is registered in the form of a Free Zone Company (FZCO) in the UAE. A Free Zone Establishment (FZE) or FZCO is a limited liability entity in the UAE governed by the rules and regulations of the Free Zone (FZ) in which it is established. For example, Jebel Ali Free Zone and Dubai Airport Free Zone are Free Zones in Dubai for conducting activities such as importing, exporting, manufacturing, processing, assembling, packaging, distribution, consolidation, storage and logistics.

8. At all times relevant to this affidavit, MOHAMADI, was the incorporator and principal of Intelligent Solutions. As a United States person, MOHAMADI is prohibited from

engaging in financial transactions involving Iran or the government of Iran or exporting goods to Iran, without the express approval of the Office of Foreign Assets Control, United States Department of Treasury.

The Iran Trade Embargo and the Iranian Transactions Regulations

9. The International Emergency Economic Powers Act ("IEEPA"), 50 U.S.C. § 1702(a)(1), gives the President of the United States broad authority to regulate exports and other international transactions in times of national emergency. IEEPA controls are triggered by an executive order declaring a national emergency based on an "unusual and extraordinary threat, which has its source in whole or substantial part outside the United States, to the national security, foreign policy, or economy of the United States." Executive orders issued pursuant to IEEPA may impose broad trade restrictions against a particular country that are more comprehensive than standard export controls, in that an embargo bars U.S. persons from engaging in a broad range of transactions involving the offending foreign government or its nationals, unless specific government authorization is obtained in advance.

10. On March 15, 1995, the President issued Executive Order 12957, which declared a national emergency with respect to Iran and the government of Iran. The executive order was issued based on presidential findings that the policies and actions of the government of Iran constitute a threat to the national security of the United States due to Iran's support of international terrorism and its attempts to acquire weapons of mass destruction.

11. On May 6, 1995, under executive IEEPA authority, the President issued Executive Order 12959, which declared a trade embargo against Iran, prohibiting the export from the United States to Iran of any goods, technology or services, with limited exceptions for

publications, other informational materials, and donated articles such as medical supplies intended to relieve human suffering. On August 17, 1997, the President reiterated and renewed the embargo by issuing Executive Order 13059, which remained in effect during the period of the instant offense.

12. The United States Department of the Treasury, Office of Foreign Assets Control, issued regulations implementing the executive order and trade embargo (the "Iranian Transactions Regulations" or "ITR"). See 31 C.F.R. § 560 et seq. In October 2012, the Treasury Department reissued and renamed the Iranian Transactions Regulations as the Iranian Transactions and Sanctions Regulations (the "ITSR"). The substantive provisions of the ITR were not changed by this action and remain in effect. These regulations prohibit the export of goods or services from the United States to Iran without obtaining a license from the Treasury Department. The ITSR further prohibit certain commercial transactions by United States persons that involve persons in Iran.

13. The Iranian Transactions and Sanctions Regulations impose, among others, the following prohibitions:

31 C.F.R. Section 560.203 – Evasions; attempts. Any transaction by any United States person or within the United States that evades or avoids, or has the purpose of evading or avoiding, or attempts to violate, any of the prohibitions contained in this part is hereby prohibited.

31 C.F.R. Section 560.204 - Prohibition of any sale or supply of any goods, technology, services to Iran or the Government of Iran. Except as otherwise authorized [by the Office of Foreign Assets Control], the exportation, . . . sale, or supply, directly or indirectly, from the United States, or by a United States person, wherever located, of any goods, technology, or services to Iran or the Government of Iran is prohibited.

31 C.F.R. Section 560.206 – Prohibited trade-related transactions with Iran; goods, technology, or services.

(a) Except as otherwise authorized pursuant to this part, and notwithstanding any contract entered into or any license or permit granted prior to May 7, 1995, no United States person, wherever located, may engage in any transaction or dealing in or related to: (1) Goods or services of Iranian origin or owned or controlled by the Government of Iran; or (2) Goods, technology, or services for exportation, reexportation, sale or supply, directly or indirectly, to Iran or the Government of Iran.

(b) For purposes of paragraph (a) of this section, the term transaction or dealing includes but is not limited to purchasing, selling, transporting, swapping, brokering, approving, financing, facilitating, or guaranteeing.

31 C.F.R. Section 560.208 – Prohibited Facilitation by United States persons of transactions by foreign persons. Except as otherwise authorized pursuant to this part, and notwithstanding any contract entered into or any license or permit granted prior to May 7, 1995, no United States person, wherever located, may approve, finance, facilitate, or guarantee any transaction by a foreign person where the transaction by that foreign person would be prohibited by this part if performed by a United States person or within the United States.

14. The Executive Orders and the Iranian Transactions and Sanctions Regulations were in effect at all times relevant to this affidavit.

15. Based on my training and experience, I understand that although there has been some limited relief from U.S. sanctions due to the Joint Comprehensive Plan of Action ("JCPOA"), none of that relief has affected the prohibitions at issue here. Since Implementation Day occurred on January 16, 2016, the ITSR was only minimally affected. It is possible to obtain, on a case-by-case basis, licenses for the export to Iran of certain items including commercial civil aviation aircraft, parts, and services for civilian end-users. Foreign entities that are owned or controlled by a U.S. person, which includes U.S. corporations, are permitted, via a general license, to engage in certain transactions involving Iran that do not involve U.S. goods, U.S. services, or U.S. persons. Also, certain Iranian entities and individuals have been removed

from OFAC's list of Specially Designated Nationals. Last, the U.S. has suspended certain so-called "secondary" economic and financial sanctions directed toward non-U.S. persons who were doing business with certain sectors of the Iranian economy. The JCPOA has no impact on the allegations set forth in this affidavit.

16. In August 2016, investigators conducted various export licensing checks with OFAC. According to OFAC, MOHAMADI has never applied for an export license to Iran.

Reports to the United States Government and the Automated Export System

17. Pursuant to U.S. law and regulation, exporters and shippers or freight forwarders are required to file certain forms and declarations concerning exports of goods and technology from the United States. Typically, those filings are completed through the submission of Electronic Export Information ("EEI") via the Automated Export System ("AES"). AES is administered by the U.S. Department of Homeland Security ("DHS"), Bureau of Customs and Border Protection. The EEI and accompanying materials are official documents submitted to the DHS in connection with export shipments from the United States.

18. An essential and material part of the EEI is information concerning the ultimate consignee and the country of ultimate destination of the export. In many cases, the identity of the ultimate consignee determines whether the goods may be exported a) without any specific authorization from the U.S. government; b) with the specific authorization or a validated license from the U.S. Department of the Treasury; or c) whether the goods may not be exported from the United States.

19. The EEI is equivalent to a statement to the United States government that the transaction occurred as described. The EEI is used by the United States Bureau of Census to



collect trade statistics and by the Bureau of Industry and Security, Department of Commerce, for export control purposes.

SOURCES OF INFORMATION

20. The information being revealed here came from one or more of the listed sources:

A. Individual A's Apple laptop computer and I-Phone – On November 14, 2012, Customs and Border Protection (CBP) conducted an outbound exam of Iranian citizen Individual A as he was departing Charlotte, NC, for Toronto, Canada. Individual A is the president of Company A, an industrial furnace manufacturer located in the Toronto, Canada area. The electronic devices were imaged and processed at HSI Cleveland.

B. MOHAMADI's Acer laptop computer – On April 12, 2013, HSI Los Angeles, CA conducted an outbound exam on MOHAMADI as she was departing the U.S. for Muscat, Oman. Business documents were observed on the computer and it was detained for processing. The laptop was imaged and processed at HSI Cleveland.

C. Email accounts intelligent.solutions.fze@gmail.com and info@intelligent-solutions.us – On January 31, 2014, HSI Cleveland executed search warrants on the two email accounts, recovering correspondence between MOHAMADI, subjects in Iran, and parts suppliers.

D. Email Account A and Email Account B – On July 10, 2014, HSI Cleveland executed search warrants on Email Account A and Email Account B, recovering correspondence between Individual B, Individual C, Company B and MOHAMADI. Individual B operates a business based in Cleveland, Ohio, Company C,

that procures industrial goods for customers. Company B is a Canadian business that engages in the procurement of industrial goods from suppliers in the United States on behalf of Iranian entities. Individual C works for Company B.

E. Company D - On July 16, 2014, HSI executed a search warrant at Company D, Solon, Ohio, and recovered miscellaneous business documents, to include sales, shipping, payment and correspondence documents between Company D, Company A, Individual A and MOHAMADI.

#### KNOWLEDGE OF EMBARGO ON IRAN

21. Several emails to and from MOHAMADI show that she had prior knowledge of the embargo and/or sanctions on Iran. For example, on August 29, 2010, MOHAMADI responded to an email with subject line, "Points to work out in the contract," that said: "Delivery: if destination not give in advance for the complete contract. There are restriction to sanction countries and according to Embargo Laws and it will be added in the contract." MOHAMADI responded in all bold: "I KNOW WHICH COUNTRIES ARE EMBARGO AND SANCTION AND WHICH COUNTRY WILL BE EMBARGO AND SANCTION, I AM AS SHIP OWNER, SO I KNOW HOW IS SHIPPING WORKS TO FIXED THE SHIPMENTS IN ADVANCE THUS DO NOT WORRY FOR THIS DELIVERY SCHEDULE, I NEVER SHOOT MY SELF."<sup>1</sup>

22. Similarly, on November 1, 2011, Individual D from Iranian Business A emailed MOHAMADI: "How are you. I am at the sanction solution and money transfer conference in the university. So far I we doing it like no one does, very happy to be here, of course I am the youngest here, and and we do it like no one. That's what separate us from the others." MOHAMADI

responded: “Good to hear that we are the best but off course in knew that already.” This was followed by three smiley faces.

### TRANSACTIONS

23. Review of evidence collected from the sources described above revealed MOHAMADI’s involvement over a period of several years with others in numerous shipments of goods from the United States and elsewhere to Iran, including goods obtained from sources in the Northern District of Ohio. Review of this evidence shows that MOHAMADI was involved in at least approximately 70 potential or completed transactions involving Iran with an estimated value of over \$3,000,000 between 2010 and 2012. These transactions include the following:

24. Ferro Silicon Titanium

A. On April 18, 2011, Individual D from Iranian Business A placed an order with Individual E for two metric tons of Ferro Silicon Titanium. This order was forwarded by Individual E to Intelligent Solutions.

B. On April 19, 2011, MOHAMADI emailed a supplier requesting a quote for 2 metric tons of Ferro Silicon Titanium powder to be delivered to the UAE.

C. On April 23, 2011, Individual D emailed MOHAMADI: “About the Fe Si Ti, we want the destination to be Iran, but if the company you are purchasing the material is in UK then they wont export the material directly to Iran and even if they do, government wont let any material come in from the UK, so I think we have to think of something for this matter.”

MOHAMADI responded this same date: “Regarding the Ferro Silicon, We again arrange shipment from UAE as we do with all our orders so you don’t have to worry about any delivery

---

<sup>1</sup> Any misspellings or grammatical mistakes in quotations from emails in this affidavit are quoted here as written in

problems what so ever.”

D. On April 25, 2011, MOHAMADI responded to an email from Individual F, Operations Supervisor for Company E, a shipping company, requesting details about the Ferro Silicon shipment. She wrote: “Quantity is 2000KG, coming from UK going to our Usual destination. All docs will be changed under our import Code and will be resent to Iran with new invoice and it must be documented as product going from UAE not UK. The shipment value is from UK to UAE is 36000 USA and from UAE to Iran is 18000 USD.”

E. On April 26, 2011, MOHAMADI emailed Individual D with the subject line “No funds received yet.” She wrote: “I have not yet received any news from the funds and neither [Individual E].” On April 27, 2011, Individual D responded: “Sorry for the inconvenience but as you know this is Iran and things are a little bit slow here I am assuring you that we transfer the money yesterday morning and it must be there maximum by tomorrow or at least that what the exchange office promise me.” This same date MOHAMADI responded: “No problem, I was just concerned because we get funds delivered to us within 2-3 hours. Please in the future use our transfer people so that the funds will be transferred in 2 hours not 3 days. We have many facilities in Iran that make life much easier.”

F. On April 27, 2011, a Sales Contract was generated by the supplier for Intelligent Solutions for 2 metric tons of Ferro Silico Titanium 45% with a price of \$36,000. An electric funds request was generated by MOHAMADI through Abu Dhabi Commercial Bank for \$36,000 to be transferred into the supplier’s account.

G. On July 26, 2011, INTELLIGENT SOLUTIONS received an invoice from

---

the source email.

Company E for shipping charges of 4,569 Arab Emirates Dirham (\$1,243) to ship Ferro Silicon Titanium from Rotherham, England to Bandar Abbas, Iran on May 29, 2011.

25. Electric Power Supply

A. Individual D emailed MOHAMADI to follow up on a phone conversation they had regarding furnaces. He stated they were looking for a large Inductotherm brand induction furnace and spare parts. MOHAMADI found a melting furnace electric power supply available from Company A in Canada who had one on consignment with Company D, Solon, Ohio. The invoiced value of the power supply was \$15,000. When arranging for the pick-up of the power supply, MOHAMADI told Individual F of Company E to invoice the goods at \$5,000.

B. On June 4, 2011, MOHAMADI emailed Individual F asking for a quote for a machine part "to be delivered to our destination" from Solon, Ohio. On June 9, 2011, Individual F provided two options. Option 1 was first leg from USA to UAE by air for \$4,820 and second leg from UAE to Iran by sea for \$450. Option 2 was first leg from USA to UAE by sea for \$2,845 and second leg from UAE to Iran by sea for \$450. MOHAMADI then emailed the estimated shipping costs to Individual D, telling him that Option 1 would be \$6,060 and Option 2 would be \$3,800.

C. On June 27, 2011, Company F, a shipping company, picked up the power supply at Company D for transport to the port of New York. On July 9, 2011, the power supply was shipped to the United Arab Emirates. The Electronic Export Information (EEI), ITN: X20110708045114, was filed listing the U.S. Principal party as Company D, Solon, OH; the ultimate consignee as Intelligent Solutions, Dubai, AE; the point of origin as Ohio; the country of ultimate destination as United Arab Emirates; the product description as Electric Power Supply

Unit; and the value as \$5,500 with No License Required. As explained above, the EEI falsely listed the value of the shipment and its ultimate destination.

26. Power Supply Units

A. On September 26, 2011 MOHAMADI arranged for the shipment of two power transformers, one power supply and a rectifier cabinet from Company A to Iranian Business A in Iran. In an email to Company F, MOHAMADI stated: "Please note that the shipment is in the Customs in Canada right now and it needs to be picked up as soon as possible. Further more it should be handled the same as the first shipment, so has to be exported to US for example and get shipped from NY to UAE please." On October 4, 2011, an employee of Company F emailed MOHAMADI: "[President of Company A] said induction equipment for foundries. However I am going to call it kitchen equipment. Is that correct?" MOHAMADI responded, "Yes just use the Kitchen equipment."

B. The Power Supply Units were exported from the port of Baltimore on October 17, 2011. The Electronic Export Information (EEI), ITN: X20111014076170, was filed listing the U.S. Principal party as Company D, Solon, OH; the ultimate consignee as a freight company in Dubai; the country of ultimate destination as United Arab Emirates; the product description as Power Transformer and Spare Parts; and the value as \$14,500. This item was listed as No License Required.

C. MOHAMADI emailed Individual D that the shipping charges for the above two shipments of "kitchen equipment" would cost \$43,000 for ocean freight from Solon, Ohio to Jebel Ali, UAE, and then from Jebel Ali to Bandar Abbas, Iran.

27. Parts for Electrical Panels

A. On November 2, 2011, Intelligent Solutions FZCO filed an EEI, ITN: X20111102061378 for the export of \$55,798 worth of component parts. Intelligent Solutions listed itself as the U.S. Principal Party of interest with a Cleveland, Ohio address. The ultimate consignee was listed on the EEI as Central Freight Systems in the UAE. The point of origination was Ohio and the country of ultimate destination was the UAE. These items were listed as No License Required. According to email traffic these goods were purchased by Company C, Cleveland, OH for Company B, Toronto, Canada, who provided it to Intelligent Solutions. Intelligent Solutions in turn shipped it to Iranian Business B, a company located in Iran.

B. In an email between MOHAMADI and Individual G of Iranian Business B, Individual G wrote: "For some of our files I have to deliver the cargo directly to cline. In this regard is it possible to give real name of our client from the time you are shipping the package from Dubai? This client is NIOC (oil governmental company in Iran) and they do not accept released cargoes from custom, they have to release it themselves, therefore is it possible for you to mention their name as consignee of the packages?"

C. MOHAMADI responded to Individual G:

We wont send any shipments without your advise. The shipments sent to you we have sent you an email before shipment and asked you where to send them and I was told to send them both to you by [Individual C]. (of [Company B]) PLEASE NOTE: Furthermore we DO NOT ADDRESS ANY PACKAGES TO OF THE government offices in your destination. We only deliver to individuals and private companies only. The delivery of goods from you to your client would be your responsibly internally and we do not interfere with that.

Please note these actions are for our safety and the safety of our systems and we can not bring this to any kind of danger what so ever.

Please arrange with your clients to received the shipments from you.

28. Parts for Electrical Panels (2)

A. On December 6, 2011, Intelligent Solutions FZCO filed an EEI, ITN: X20111206064769 for the export of \$31,569 worth of component parts. Intelligent Solutions listed itself as the U.S. Principal Party of interest with a Brook Park, Ohio address. The ultimate consignee was listed on the EEI as Central Freight Systems in the UAE. The point of origination was Ohio and the country of ultimate destination was the UAE. These items were listed as No License Required. According to email traffic these goods were purchased by Company C, Cleveland, OH with invoice number X2342, for Company B, who in turn provided it to Intelligent Solutions. Intelligent Solutions then shipped it to Iranian Business B in Iran.

B. On December 17, 2011, Individual G emailed MOHAMADI: "Today I received the arrival notice from the shipping agency in Iran, would you please let me know about the original BL?<sup>2</sup> To get the release note from courier I have to give them the original BL."

C. On April 8, 2012, MOHAMADI emailed Individual F and another employee of Company E: "My client have called me yesterday and told me that the agent in Iran told them that they never have received an email request to release the following shipments to IRANOL . BL No. 100611000118 and BL No. 100611000134. ... They are telling me that they are in lots of trouble and I need to know what is going on. [Individual F] told me that he has sent this request already. Why is the agent in Iran not receiving one simple email." BL No. 100611000134 was for Parts for Electrical Panels. According to public source information, IRANOL is an oil refinery in Iran.

29. Foxboro Masoneilan Valve Positioners

---

<sup>2</sup> "BL" stands for "Bill of Lading."



A. On June 28, 2011, Company B placed an order with Company C, Cleveland, Ohio for ten (10) Masoneilan Electropneumatic Valve Positioners valued at \$36,710. On February 21, 2012, Mohammad Individual C of Company B emailed MOHAMADI instructing her to pick up the Masoneilan parts from Company C operated by Individual B and located in Cleveland, Ohio.

B. For this shipment, MOHAMADI utilized Company F (Los Angeles, CA) as the freight forwarding company. Investigators obtained emails from Company F which included an email exchange dated February 21, 2012, between MOHAMADI and Company F. During the series of emails, MOHAMADI, instructed Company F to arrange the pickup of a package from Individual B. MOHAMADI described the weight (94 lbs.), and the dimensions (30"x30"x23"). Company F also provided investigators with an Intelligent Solutions commercial invoice, #X1744-AV51, dated February 29, 2012, listing Company E, Jebel Ali Free Zone, Dubai, United Arab Emirates telephone: 97148838600 Ext 206. The invoice described ten (10) valve positioners at a unit price of \$250 with a total price of \$2,500 USD. The invoice listed the business address as PO Box 71645, Dubai, United Arab Emirates, Cell: +97 155 9226841.

C. On February 22, 2012, MOHAMADI emailed Individual G of Iranian Business B requesting consignee information. Individual G responded: "The client of this file is very important same as X2342, therefore as soon as the part arrived Dubai, please do not forget to arrange the BL condition before sending." Individual G stated that the consignee was in Tehran, Iran and further provided, "It is very important to have the DHL tracking number before arrival of the parcel to Iran, in case DHL releases the parcel from Iran Custom, we have to send it back to UAE and again too Iran because our client have to release the parts itself."

D. On February 29, 2012, MOHAMADI provided an invoice to Company E for 10

Valve Positioners with a total value of \$2,500.

E. On March 1, 2012, an EEI, ITN: X20120301049381 was filed with the U.S. Principal Party (USPPI) being Intelligent Solutions FZCO, Brook Park, Ohio, and the ultimate consignee being Company E, Dubai, UAE. The point of origin was Ohio and the country of ultimate destination was the UAE. The stated value of the Valve Positioners was listed as \$2,500 and that no license was required.

F. On March 5, 2012, the shipment of electropneumatic valve positioners used in the oil and gas industry was detained<sup>3</sup> by U.S Customs and Border Protection (CBP), Chicago, Illinois at the request of the Office of Export Enforcement (OEE). The OEE request was based on a foreign company (Intelligent Solutions) being listed as the U.S. Principal Party in Interest for the shipment. The shipment contained the following documents: [Company F], Los Angeles, CA 90045 Air Waybill # 22116954 / Master # 157-73548650, dated 3/5/2012, which listed the shipper's name as: Intelligent Solutions FZCO 19697 Holland Road/Jebel Ali Free Zone PO Box 24313, Brook Park, OH 44142 Attn: [Individual B]. The consignee's name was listed as: [Company E], Jebel Ali Free Zone, Dubai, United Arab Emirates / telephone 97148838600 Ext 206. The Air Waybill listed the dimension as 30x30x23, and "valve positioners" as the nature and quantity of goods. Company F cargo manifest # 157-73548650, dated 3/5/2012, listed Company E (Consignee) Jebel Ali Free Zone, Dubai, United Arab Emirates as the consignee and listed the cargo description as "valve positioners" and the shipper as Intelligent Solutions FZCO

---

<sup>3</sup> The U.S. Customs and Border Protection (CBP) Seized Asset Management and Enforcement Procedures Handbook (SAMEPH) references "detention" as withholding release of property pending review for admissibility or proper importation or exportation. Merchandise can be detained for clarification of underlying issues such as end user and/or licensing. Due process of law requires that the government provide a notice of detention. A detention can evolve into a seizure. In that event, the notice of detention becomes part of the seizure documentation.

19697 Holland Road, Brook Park, Ohio 44142 Attn: [Individual B].

G. On March 7, 2012, Individual B provided OEE with a commercial invoice #X1744-AV51, dated February 23, 2012, listing ten (10) Masoneilan electropneumatic valve positioners with a unit cost of \$3,671.00 and total cost of \$36,710.00 USD.

H. Based on post-detention review of the shipping documents contained within the shipment and documents provided by Individual B and Company F, it appears that MOHAMADI and Intelligent Solutions undervalued the shipment by declaring the value as \$2,500, which constitutes a violation of the Federal Trade Regulations, 15 CFR 30 § 758.1. In order to obtain the valves from the U.S. manufacturer, Individual B also had to complete an end-use statement providing the intended end-use, end-user, and country of destination of the valves, as well as acknowledging that diversion of the valves is contrary to U.S. law. Individual B submitted the end-use form stating the end-user was Qatar General Petroleum for use in Qatar. During an interview with Individual B on March 27, 2012, Individual B advised OEE agents that he had spoken to MOHAMADI, who told him the end user was Intelligent Solutions and the valve positioners were destined for use in trade shows in Iraq and Oman.

I. Company F provided investigators with an additional email exchange dated March 23, 2012. During the series of emails, MOHAMADI provided Company F clarification regarding master number 157-733548650. MOHAMADI advised that the “merchandise are not sold yet to any end user” and that the “company purchases different oil product from small refineries in Iraq meanwhile we are have been working on some projects in Erbil Iraq to work on some of the small refineries to help them to up grade there factories for better production of there product.” MOHAMADI further advised: “We then further sale these product to European and

Asian countries such as Thailand.”

J. On July 10, 2012, CBP Chicago, Illinois officially seized the shipment of valve positioners (CBP seizure # 2012SZ009205301) originally detained on behalf of OEE on March 5, 2012, which was destined for Company E, located in Dubai, UAE.

K. In September 2012, the CBP Fines, Penalties, and Forfeiture Office sent Intelligent Solutions a notice of seizure (CBP seizure # 2012SZ009205301) to the Brook Park, Ohio address. The mailing was returned and CBP contacted Individual B because his name and contact information was listed on the air waybill. Individual B advised CBP to contact and forward the notice of seizure to Parisa MOHAMADI with Intelligent Solutions, located in Dubai, UAE.

L. Prior to the seizure U.S. Department of Commerce, Bureau of Industry and Security asked that MOHAMADI complete a Form BIS-711, Statement by Ultimate Consignee and Purchaser. On April 9, 2012, MOHAMADI signed this form stating that Intelligent Solutions was the ultimate consignee and that the items were to “be used in exhibition and trade show in order to get further consultation contracts orders in the middle east in Iraq and Oman.” MOHAMADI described the nature of business of the ultimate consignee as “consulting and trading in oil product in Iraq and Metal,” and the business relationship with the U.S. exporter as: “If any orders from our oil suppliers and refineries our US exporter will be our main supplier.” MOHAMADI’s statements regarding the location of the end user were inconsistent with the emails described above indicating the ultimate destination of the valves was Iran.

### **Conclusion**

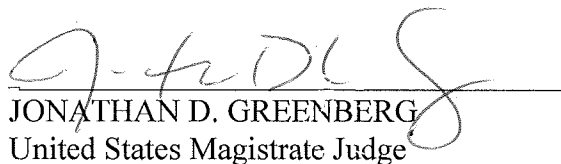
30. Based on the facts set forth herein, and on my experience and training in

investigating cases involving violations of federal law, I submit there is probable cause to believe that Parisa MOHAMADI, a United States person, has violated Title 50, United States Code, Section 1705(a) and (c) and 31 C.F.R. Sections 560.203 and 560.204 by conspiring to export and to cause to be exported goods directly or indirectly to Iran without the required United States Department of Treasury licenses.



Aaron D. Burdine, Special Agent  
Homeland Security Investigations

SUBSCRIBED and SWORN  
before me this 13<sup>th</sup> day of January, 2017



JONATHAN D. GREENBERG  
United States Magistrate Judge