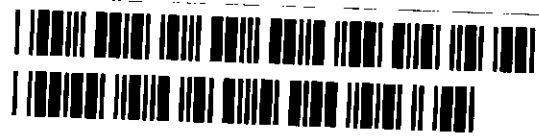


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08-CR-00251-INFO

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JUL 17 2008

AT SEATTLE
CLERK U.S. DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
DEPUTY
UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

UNITED STATES OF AMERICA,

Plaintiff,

v.

TOMOAKI IISHIBA,

Defendant.

CR08 0251 MJP

INFORMATION
(Felony)

THE UNITED STATES ATTORNEY CHARGES THAT:

COUNT 1

(Conspiracy to Smuggle Goods from the United States)


Beginning in or before 2006, and continuing through and including February 2008, in the Western District of Washington, and elsewhere, TOMOAKI IISHIBA and other persons known and unknown, knowingly and intentionally did conspire to fraudulently and knowingly export from the United States, contrary to laws and regulations of the United States, merchandise, articles, and objects, namely, EoTech 553 holographic night vision compatible firearm sights; EoTech 550 firearm sights; and other firearms parts, including upper receivers modified for Airsoft, and scopes; in violation of Title 18, United States Code, Section 554(a).

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1 During the conspiracy, TOMOAKI IISHIBA committed numerous overt acts in
2 furtherance of the conspiracy, including purchasing sixty EoTech 553 sights from a
3 business known as Optics Planet, and mailing the sights to coconspirators in Japan
4 without first obtaining an export license.

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

6 DATED this 16th day of July, 2008.

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8 
9 JEFFREY C. SULLIVAN
United States Attorney

10
11 
12 ROBERT WESTINGHOUSE
Assistant United States Attorney

13
14 
15 TODD GREENBERG
Assistant United States Attorney