

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA

CASE NO. **16-20803 CR-BLOOM**

18 U.S.C. § 371
50 U.S.C. §§ 1705(a) & (c)
18 U.S.C. § 554(a)
13 U.S.C. § 305
18 U.S.C. § 1001(a)(2)
18 U.S.C. § 1956(h)
18 U.S.C. § 2
18 U.S.C. § 981(a)(1)
19 U.S.C. § 1595a(d)

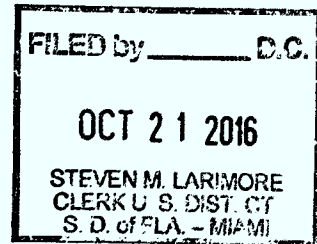
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UNITED STATES OF AMERICA

vs.

ALI CABY,
a/k/a "Alex Caby,"
ARASH CABY,
a/k/a "Axel Caby,"
MARJAN CABY,
ADIB ZENO,
RIZK ALI,
AMMAR AL MOUNAJED,
ZHELYAZ ANDREEV,
MIHAELA NENOVA,
LYUBKA HRISTOVA,
ISKREN GEORGIEV,
IVAN SERGIEV,
and
SYRIAN ARAB AIRLINES,
a/k/a "Syrian Air,"

Defendants.



INDICTMENT

The Grand Jury charges that:

GENERAL ALLEGATIONS

At times material to this Indictment:

The Companies

1. AW-TRONICS, LLC, and Arrowtronic, LLC, were limited liability companies in the State of Florida that operated as the same company. AW-TRONICS, LLC, a/k/a “Arrowtronic” (AW-TRONICS), maintained offices in Miami, Florida, and Sofia, Bulgaria, and was engaged in the business of selling aircraft parts.

2. **SYRIAN ARAB AIRLINES**, a/k/a “**Syrian Air**” (**SYRIAN ARAB AIRLINES**), was an airline company owned and controlled by the government of Syria.

The Defendants

3. **ALI CABY**, a/k/a “**Alex Caby**” (**ALI CABY**), was a managing member and registered agent of AW-TRONICS in charge of the Sofia office.

4. **ARASH CABY**, a/k/a “**Axel Caby**” (**ARASH CABY**), was a managing member and registered agent of AW-TRONICS in charge of the Miami office.

5. **MARJAN CABY** was an employee of AW-TRONICS who worked in the Miami office as an internal auditor who dealt with export compliance.

6. **ADIB ZENO (ZENO)** was a materials and logistics manager for **SYRIAN ARAB AIRLINES**.

7. **RIZK ALI (ALI)** was a materials and logistics manager for **SYRIAN ARAB AIRLINES**.

8. **AMMAR AL MOUNAJED (AL MOUNAJED)** was a regional manager for **SYRIAN ARAB AIRLINES** in Dubai, United Arab Emirates.

9. **ZHELYAZ ANDREEV (ANDREEV)** was an employee of AW-TRONICS in the Sofia office.

10. **LYUBKA HRISTOVA (HRISTOVA)** was an employee of AW-TRONICS in the Sofia office.

11. **MIHAELA NENOVA (NENOVA)** was an employee of AW-TRONICS in the Sofia office.

12. **ISKREN GEORGIEV (GEORGIEV)** was an employee of AW-TRONICS in the Sofia office.

13. **IVAN SERGIEV (SERGIEV)** was an employee of AW-TRONICS in the Sofia office.

The Statutes and Regulations

IEEPA, the EAR, and the CCL

14. Under the International Emergency Economic Powers Act (“IEEPA”), 50 U.S.C. §§ 1701-07, the President of the United States was granted authority to deal with unusual and extraordinary threats to the national security and foreign policy of the United States. Under IEEPA, the President may declare a national emergency through Executive Orders that have the full force and effect of law.

15. IEEPA also empowers the U.S. Department of Commerce (“DOC”) to issue regulations governing exports. Initially, the Export Administration Act (“EAA”), 50 App. U.S.C. §§ 2401-2420, regulated the export of goods, technology, and software from the United States. Pursuant to the provisions of the EAA, the DOC promulgated the Export Administration Regulations (“EAR”), 15 C.F.R. §§ 730-774, which contain additional restrictions on the export of goods outside of the United States, consistent with the policies and provisions of the EAA. *See* 15 C.F.R. § 730.02. Although the EAA lapsed on August 17, 2001, pursuant to the authority

provided to the President under IEEPA, the President issued Executive Order 13222, which declared a national emergency with respect to the unusual and extraordinary threat to the national security, foreign policy, and economy of the United States in light of the expiration of the EAA. Accordingly, pursuant to IEEPA, the President ordered that the EAR's provisions remain in full force and effect despite the expiration of the EAA. Presidents have issued annual Executive Notices extending the national emergency declared in Executive Order 13222 from the time period covered by that Executive Order through the present. *See, e.g.*, 80 Fed. Reg. 52587 (Aug. 8, 2016). Under IEEPA, it is a crime to willfully violate any regulation promulgated thereunder, including the EAR. *See* 50 U.S.C. § 1705.

16. Pursuant to its authority derived from IEEPA, the DOC reviewed and controlled the export of certain items, including goods, software, and technologies, from the United States to foreign countries through the EAR. In particular, the EAR restricted 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 imposed 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. The most sensitive items subject to EAR controls were identified on the Commerce Control List, or "CCL," published at 15 C.F.R. Part 774, Supp. No. 1. Items on the CCL were categorized by Export Control Classification Number ("ECCN"), each of which has export controls requirements depending on destination, end use, and end user.

17. Under the EAR, the export of items subject to the EAR that will transit or be transshipped through a country or countries, en route to a new country, are deemed to be exports to the new country. 15 C.F.R. § 734.2(b)(6).

18. Pursuant to IEEPA Section 1705(a), “[i]t shall be unlawful for a person to violate, attempt to violate, conspire to violate, or cause a violation of any license, order, regulation, or prohibition issued under this chapter,” and pursuant to Section 1705(c), “[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) of this section shall” be guilty of a crime.

United States Sanctions Against Syria

19. Pursuant to IEEPA, the President and the executive branch have issued orders and regulations governing and prohibiting certain transactions with Syria by U.S. persons or involving U.S.-origin goods.

20. The President signed the Syria Accountability and Lebanese Sovereignty Restoration Act of 2003 (Pub. L. 108-175, codified as a note to 22 U.S.C. § 2151) (“the SAA”) in December 2003. Section 5(a)(1) of the SAA requires the President to prohibit the export to Syria of all items on the CCL and to impose two or more of six additional sanctions, as set forth in Section 5(a)(2)(A)-(F) of the SAA.

21. On May 11, 2004, the President issued Executive Order 13338, declaring that “the actions of the Government of Syria, in supporting terrorism, continuing its occupation of Lebanon, pursuing weapons of mass destruction and missile programs, and undermining United States and international efforts with respect to the stabilization and reconstruction of Iraq,

constitute an unusual and extraordinary threat to the national security, foreign policy, and economy of the United States.” The Executive Order imposes U.S. sanctions against Syria, including a broad prohibition on the export and re-export to Syria of items subject to the EAR, and provides that “the Secretary of Commerce shall not permit the exportation or re-exportation to Syria of any product of the United States,” except for food and medicine, and that “[n]o other agency of the United States Government shall permit the exportation or re-exportation to Syria of any product of the United States.” The Executive Order also prohibits any “transaction by a United States person or within the United States that evades or avoids, has the purpose of evading or avoiding, or attempts to violate any of the prohibitions set forth” in the order. In accordance with Executive Order 13338, the U.S. Department of Commerce, Bureau of Industry and Security (DOC/BIS), implemented sanctions on Syria by issuing General Order No. 2 to Supplement No. 1 to Part 736 (“General Order No. 2”) and corresponding regulations (15 C.F.R. Part 746.9), restricting exports and re-exports to Syria of all items subject to the EAR other than food and certain medicine.

22. With certain limited exceptions not relevant here, U.S. Sanctions against Syria prohibit, among other things, the export, re-export, sale, or supply, directly or indirectly, of goods from the United States or by a United States person wherever located, to Syria or the Government of Syria without prior authorization from the Secretary of State or the Secretary of Commerce.

SYRIAN ARAB AIRLINES’ Designation as a Specially Designated National

23. On May 16, 2013, pursuant to Executive Order 13224, the Department of the Treasury’s Office of Foreign Assets Control (OFAC) listed **SYRIAN ARAB AIRLINES** as a

Specially Designated National. As a Specially Designated National, **SYRIAN ARAB AIRLINES**' assets are blocked and U.S. persons are generally prohibited from dealing with it. An OFAC license is required to export to Syria any items subject to the EAR, which necessarily includes all items on the CCL. 31 C.F.R. § 594.204.

24. OFAC listed **SYRIAN ARAB AIRLINES** as a Specially Designated National due to its illegal actions on behalf of Iran's Islamic Revolutionary Guard Corps (IRGC). The IRGC used **SYRIAN ARAB AIRLINES** cargo flights to transport weapons and ammunition to Syria. Hizbollah, a Lebanese terrorist organization, helped facilitate these **SYRIAN ARAB AIRLINES** shipments for IRGC to aid the crackdown against Syria's civilian population.

Export and Shipping Records (EEI, SED and AES)

25. The DOC required the filing of electronic export information (EEI), previously the Shipper's Export Declaration (SED), through the Automated Export System (AES) pursuant to Title 13, United States Code, Section 305 and Foreign Trade Regulations (FTR), Title 15, Code of Federal Regulations, Part 30. The purpose of these requirements was to strengthen the United States government's ability to prevent the export of certain items to unauthorized destinations and end users because the AES aids in targeting, identifying, and when necessary confiscating suspicious or illegal shipments prior to exportation. 15 C.F.R. § 30.1(b). The AES was administered by the Department of Homeland Security (DHS), Customs and Border Protection (CBP).

26. With exceptions not relevant to the exports at issue in this Indictment, EEI was required to be filed for, among other things, the export of commodities valued over \$2,500. EEI was required to contain, among other things, the names and addresses of the parties to the

transaction; the description, quantity, and value of the items exported; the ultimate consignee (end user); and the ultimate country of destination. 15 C.F.R. § 30.6(a).

The Exported Items Listed on the CCL

27. As discussed above, the CCL listed the most sensitive items subject to EAR controls and categorized them by ECCN. Each ECCN category had export controls requirements depending on destination, end use, and end user. As discussed above, Executive Order 13338 and subsequent DOC/BIS regulations prohibit exports to Syria of all items subject to the EAR (other than food and certain medicine), including all items listed on the CCL.

28. Micro switches, Part Number (PN) 6763-01860, were installed on flow control valves used on Airbus A319/320/321 jetliner aircraft. These items were classified on the CCL under ECCN 9A991.d (parts and components specifically designed for aircraft).

29. Lighted indicators, PN 900VR02S3D41AQW, were used in the cockpit panels of ATR aircraft. These items classified on the CCL under ECCN 9A991.d (parts and components specifically designed for aircraft).

30. Fault switches, PN 120VK01N0GB315, were used in the instrument panels on ATR aircraft. These items were classified on the CCL under ECCN 7A994 (certain navigation direction finding equipment, airborne communication equipment, all aircraft inertial navigation systems).

31. Fuel temperature transmitters, PN 8316-103-00-10, were probes or sensors used in ATR aircraft. These items were classified on the CCL under ECCN 9A991.d (parts and components specifically designed for aircraft).

32. Push-pull cable propeller power, PN 4297515, was used in ATR aircraft. This

item was classified on the CCL under ECCN 9A991.d (parts and components specifically designed for aircraft).

33. None of the defendants ever applied for or obtained a DOC or OFAC license to export any of the above-listed CCL items to Syria or to **SYRIAN ARAB AIRLINES**.

34. Tactical air navigation accessory unit, PN T-1401, was an electronic device used to test and service air-to-air, ground-to-air, and inverse tactical air navigation airborne equipment. This item was classified on the CCL under ECCN 3A611.a (military electronics equipment) on December 30, 2014. This item is discussed in this Indictment in connection with its export to China. As of December 30, 2014, this ECCN category required a DOC license to be exported to China.

COUNT 1

**Conspiracy to Export Items in Violation of IEEPA and to Defraud the United States
(18 U.S.C. § 371)**

1. The allegations in Paragraphs 1 through 33 of the General Allegations are incorporated and realleged by reference in this Count.

2. Beginning as early as in or around September 2013, the exact date being unknown to the Grand Jury, and continuing through in or around June 2015, in Miami-Dade County, in the Southern District of Florida, and elsewhere, the defendants,

**ALI CABY,
a/k/a “Alex Caby,”
ARASH CABY,
a/k/a “Axel Caby,”
MARJAN CABY,
ADIB ZENO,
RIZK ALI,
AMMAR AL MOUNAJED,
ZHELYAZ ANDREEV,
MIHAELA NENOVA,**

**LYUBKA HRISTOVA,
ISKREN GEORGIEV,
and
SYRIAN ARAB AIRLINES,
a/k/a “Syrian Air,”**

did knowingly and willfully combine, conspire, confederate, and agree with each other and with others known to the Grand Jury to (1) export and cause the exportation of goods indirectly from the United States to Syria without first having obtained the required licenses from DOC, in violation of Title 50, United States Code, Sections 1701-1706, and Title 15, Code of Federal Regulations, Part 746.9(a); (2) export and cause the exportation of goods indirectly from the United States to SDN **SYRIAN ARAB AIRLINES** without first having obtained the required licenses from OFAC, in violation of Title 50, United States Code, Sections 1701-1706, and Title 31, Code of Federal Regulations, Part 594.204; and (3) defraud the United States government, namely DOC and OFAC, by interfering with and obstructing a lawful government function by deceit, craft, trickery, and dishonest means.

PURPOSE AND OBJECT OF THE CONSPIRACY

3. The purpose and object of the conspiracy was to unlawfully export goods from the United States through transshipment points to Syria and to **SYRIAN ARAB AIRLINES**, and in doing so evade the prohibitions and licensing requirements of IEEPA and detection by the United States government.

MANNER AND MEANS OF THE CONSPIRACY

The manner and means by which the defendants and their co-conspirators sought to accomplish the objects of the conspiracy included, among others, the following:

4. The co-conspirators would use electronic mail (email) accounts and other

forms of communication to communicate with each other between the United States, Bulgaria, United Arab Emirates (UAE), and Syria.

5. Some of the co-conspirators would purchase from United States vendors CCL-listed items for export to Syria.

6. Some of the co-conspirators would conceal the true destination of CCL-listed items and other items by shipping the goods without a license from the United States to Bulgaria or UAE and then reexporting the goods to Syria.

7. Some of the co-conspirators would provide materially false, misleading, and incomplete information such as electronic export information (EEI) and SEDs in AES records, and other documents to conceal the illegal exports.

8. Some of the co-conspirators would arrange for payment for the illegal exports using third-party companies to transfer payments between the co-conspirators.

OVERT ACTS

In furtherance of this conspiracy, and to accomplish its purpose and object, at least one of the conspirators committed or caused to be committed, in the Southern District of Florida and elsewhere, at least one of the following overt acts, among others:

Transaction Set 1: September–October 2013

1. On or about September 9, 2013, **ZENO** from **SYRIAN ARAB AIRLINES** sent **ANDREEV** at AW-TRONICS an order for “3 bat chg switch,” PN 120VK01N0GB315, “2 light chart holder[s],” PN 10-62A, and “4 a/c wide generator bearing,” PN RSY20032-2, in Purchase Order (PO) 13035.

2. On or about September 9, 2013, **GEORGIEV** at AW-TRONICS sent Proforma

Invoice (PI) 002061 to **ZENO** for the items requested in PO 13035.

3. On or about September 11, 2013, **ZENO** sent **ANDREEV** a request for quote (RFQ) for “1 push-pull cable propeller power,” PN 4297515, and “1 Aileron Lock Actuator,” PN VL005030B, in RFQ 13032.

4. On or about September 17, 2013, **ANDREEV** sent PI 002068 to **ZENO** for the items requested in RFQ 13032.

5. On or about October 22, 2013, **ANDREEV** sent Invoice 004436, dated October 7, 2013, to **ZENO** for the items requested in RFQ 13032.

6. On or about October 22, 2013, **ANDREEV** sent Invoice 006050, dated October 15, 2013, to **ZENO** for the items requested in PO 13035.

Syrian Air’s Payment to AW-Tronics for Transaction Set 1

7. On or about September 26, 2013, **ZENO** sent an email to **ANDREEV** with an attachment from **SYRIAN ARAB AIRLINES** to a travel agency in the UAE authorizing the transfer of \$28,328.26 to AW-TRONICS for POs 13032 and 13035.

8. On or about October 1, 2013, **ZENO** caused a payment of \$28,328.20 to be made via telegraphic transfer deposit to AW-TRONICS through a travel agency in the UAE on behalf of **SYRIAN ARAB AIRLINES** for POs 13032 and 13035.

9. On or about October 7, 2013, **ALI CABY** received a copy of an email between an employee of AW-TRONICS and **NENOVA** confirming the payment of \$28,319.86 to AW-TRONICS for PIs 002061 and 002068, which correspond to POs 13032 and 13035.

Shipments of Transaction Set 1 Items from AW-Tronics to Syrian Air

10. On or about October 14, 2013, an employee of AW-TRONICS sent an email to

AW-TRONICS in Miami indicating that “2 light chart holder[s],” PN 10-62A, from PO 005954 and “1 bat chg switch,” PN 120VK01N0GB315, from PO 005994 should have arrived at the AW-TRONICS warehouse in Miami and that both POs “are for SyrianAir.”

11. On or about October 15, 2013, **HRISTOVA** sent an email to AW-TRONICS in Miami copying **NENOVA** and **GEORGIEV** concerning POs 005954 and 005994 and instructing it to ship the parts to **SYRIAN ARAB AIRLINES** in Dubai and bill “SYRIAN AIR Damascus Syria.”

12. On or about October 16, 2013, AW-TRONICS paid \$1,800.00 to a Pompano Beach, Florida, vendor with Check No. 3313 from an HSBC bank account for the “2 light chart holder[s].”

13. In or around October 2013, **NENOVA** signed a Destination/End Use Statement provided to the Pompano Beach vendor for the “light chart holder[s]” and falsely listed the destination country as “USA.”

14. On or about October 21, 2013, AW-TRONICS paid \$250.00 to a Memphis, Tennessee, vendor with Check No. 3330 from the HSBC bank account for the “1 bat chg switch.”

15. In or around October 2013, AW-TRONICS shipped to **SYRIAN ARAB AIRLINES** via DHL the “1 push-pull cable propeller power” referenced in Invoice 004436.

16. In or around October 2013, AW-TRONICS shipped a package to **SYRIAN ARAB AIRLINES** in Dubai describing the contents as “Light Switch” and declaring a value of \$3,600.00.

17. On or about October 21, 2013, **ANDREEV** sent an email to **ZENO** stating, “The

parts are in Dubai since last four days. These are the two DHL Tracking numbers for the two shipments – 5822005884, 5982375254. Now you can contact [a cargo company], so they can export the parts to your location.”

18. On or about November 17, 2013, **AL MOUNAJED** from **SYRIAN ARAB AIRLINES** authorized a cargo company to ship the light chart holders, the push-pull cable propeller power, and the battery charge switch from Dubai to Damascus, Syria.

Transaction Set 2: September 2013–February 2014

19. On or about October 24, 2013, **ZENO** from **SYRIAN ARAB AIRLINES** sent **ANDREEV** at AW-TRONICS an order for “1 Valve (Pressure Valve),” PN 3214958-1, in PO 13036.

20. On or about October 24, 2013, **ANDREEV** sent PI 002127 to **ZENO** for the item requested in PO 13036.

21. On or about November 28, 2013, **ZENO** sent **ANDREEV** an order for “6 Light Indicator,” PN 900VR02S3D41AQW, and “3 Fuel Temp Transmeter,” PN 8316-103-00-10, in PO 13048.

22. On or about November 28, 2013, **ANDREEV** sent PI 002177 to **ZENO** for the items listed in PO 13048.

23. On or about December 1, 2013, **ZENO** sent an email to **ANDREEV** indicating that payment for PO 13036 would be made on December 3, 2013, by the “agent in abo dhabi” and attaching a fax from **SYRIAN ARAB AIRLINES** confirming an upcoming \$7,495.00 payment to AW-TRONICS for PO 13036.

Syrian Air's Payment to AW-Tronics for Transaction Set 2

24. On or about December 4, 2013, AW-TRONICS received a \$7,495.00 payment from a travel agency on behalf of **SYRIAN ARAB AIRLINES** via wire transfer for PO 13036.

Shipments of Transaction Set 2 Items from AW-Tronics to Syrian Air

25. On or about February 11, 2014, an employee of AW-TRONICS, sent an email to a Cedar Rapids, Iowa, vendor containing as an attachment PO 006672 for the "3 Fuel Temp Transmeter."

26. On or about February 11, 2014, AW-TRONICS paid \$2,985.00 to the Cedar Rapids vendor with a charge to an American Express account registered in the name of **ALI CABY**.

27. On or about February 11, 2014, an employee of AW-TRONICS sent PO 006676 to a Pompano Beach, Florida, vendor for the "6 Light Indicator" in an email copying **MARJAN CABY**.

28. On or about February 19, 2014, AW-TRONICS paid \$3,240.00 to the Pompano Beach vendor with Check No. 3862 from the HSBC bank account for the "6 Light Indicator."

29. On or about February 11, 2014, **NENOVA** asked **ARASH CABY** in an email whether AW-TRONICS could sign a U.S. vendor's end-use certification form for the "light indicator" despite the form's warning that export to Syria was prohibited, and **ARASH CABY** replied that it "should be fine to go."

30. On or about February 17, 2014, an employee of AW-TRONICS sent Invoice 006661 to **ZENO** at **SYRIAN ARAB AIRLINES** for the "6 Light Indicator" and the "3 Fuel Temp Transmeter."

31. On or about February 13, 2014, AW-TRONICS in Miami shipped a package via DHL to **SYRIAN ARAB AIRLINES** in Dubai to the attention of **ZENO** with a description of “Light Indicator Temp Transmet” valued at \$8,875.00.

Transaction Set 3: February–March 2014

32. On or about January 12, 2014, **ZENO** from **SYRIAN ARAB AIRLINES** sent **ANDREEV** at AW-TRONICS an order for “5 Microw Switch,” PN 6763-01860, in PO 14002.

33. On or about February 23, 2014, **ALI** from **SYRIAN ARAB AIRLINES** sent **ANDREEV** an updated PO 14002A for the “5 Microw Switch.”

34. On or about February 24, 2014, an employee of AW-TRONICS sent PO 006746 to a Miramar, Florida, vendor for the “5 Microw Switch.”

35. On or about February 26, 2014, AW-TRONICS in Miami received 4 micro-switches from the Miramar vendor, and on or about March 4, 2014, it received the one remaining micro-switch.

36. On or about February 25, 2014, AW-TRONICS paid \$3,386.00 to the Miramar vendor with Check No. 3914 from the HSBC bank account, and on or about March 5, 2014, it paid \$851.00 to the Miramar vendor with Check No. 3959 from the same account.

37. On or about February 27, 2014, **HRISTOVA** sent Invoice 006711 to **ALI** and **ANDREEV** for the “4 Microw Switch,” with an email regarding the shipment stating “Invoice 006711/PO# 14002A-K-CM. Parts were shipped from our office in USA with DHL AWB# 18 8849 5291.”

38. On or about March 5, 2014, AW-TRONICS in Miami prepared Invoice 006757 for its Sofia, Bulgaria, office for the “1 Microw Switch.”

39. On or about March 10, 2014, AW-TRONICS in Sofia prepared Invoice 4879 to **SYRIAN ARAB AIRLINES** in the amount of \$1240.00 for the “1 Microw Switch.”

40. On or about March 5, 2014, **HRISTOVA** emailed Invoice 006757 to **ALI CABY, ARASH CABY, and MARJAN CABY.**

41. On or about March 24, 2014, **ANDREEV** emailed Invoice 4879 to **ALI** copying **NENOVA.**

42. On or about March 5, 2014, after the shipment of the “4 Microw Switch” had been stopped by the United States Customs Service presenting its delivery to **SYRIAN ARAB AIRLINES, HRISTOVA** sent an email to **ALI CABY, ARASH CABY, MARJAN CABY, NENOVA, and GEORGIEV** stating:

Our shipping instructions for BG PO#006746, part#6763-01860 1 piece, with UPS tr#1Z8X183X 7276789957 for today. Please, ship out parts to our address in Sofia: ArrowTronic LTD 51 AleksandarMalinovblvd, office 9B Sofia, 1712 Bulgaria contact person: Lyubka Hristova Logistic Department.....ship via DHL on account 951942017 worldwide express service/next day delivery by air/ US invoice 006757 was created. Please, verify part#, condition, EASA FORM 1 and ship to Bulgaria to avoid issues with delivery to Dubai. BR Lyubka Hristova.

43. On or about March 5, 2014, **MARJAN CABY** sent an email to **ALI CABY, ARASH CABY, NENOVA, HRISTOVA, and GEORGIEV** titled “Our shipping instruction for BG PO# 006746, part# 6763-01860 1 piece” and stating:

Please note that NOTHING WILL BE SHIPPED TO CLIENTS IN THE MIDDLE FROM THE USA OFFICE. WE HAVE TO SEND TO BG THEN TO CLIENT. COUNTRIES: ISRAEL, IRAQ, EMIRATES, SYRIA, SAUDI ARABIA, LYBIA, YEMMEN, KUWAIT ETC... We will have are [sic] packages stopped by the US Customs and Border Control. We have a case like this for the same client. Thank you, Marjan Caby, AW-Tronics Headquarters, New World Tower, 100 Biscayne Blvd. Suite 1315, Miami-FL-33132 email: marjan.caby@awtronsics.com, phone: 1 786 228 7365 ext 3500, cell 1 305 989 5919, fax 1 786 693 8743, website www.awtronsics.com.

Shipments of Transaction Set 3 Items from AW-Tronics to Syrian Air

44. On or about March 6, 2014, AW-TRONICS shipped a package via DHL from its Miami office to **HRISTOVA** in Sofia with a description of the contents as “Switch Micro” and a value of \$890.00.

45. On or about March 6, 2014, **MARJAN CABY** sent an email to **NENOVA** copying **ARASH CABY** titled “Tracking Numbers for BG from US” and stating: “Arrowtronic BG/Syrian Air: Shipping to BG AWB 3643366731 DHL Invoice 006757.”

46. On or about March 24, 2014, **ANDREEV** sent an email to **ALI** copying **NENOVA** and stating: “[W]e have shipped 1 pcs of PN6763-01860, Microwswitch...The DHL AWB is 81 6527 9124. The part is on the customs in Dubai.”

47. On or about April 13, 2014, **AL MOUNAJED** authorized a third-party cargo company to transship the “1 Microw Switch” from Dubai to Damascus, Syria.

All in violation of Title 18, United States Code, Section 371; Title 50, United States Code, Sections 1705(a) and (c); Executive Order 13338; Title 15, Code of Federal Regulations, Part 746.9(a); and Title 31, Code of Federal Regulations, Part 594.204.

COUNTS 2-7

**Export and Attempted Export of Goods in Violation of the Syria Sanctions
(50 U.S.C. §§ 1705(a) & (c))**

1. Paragraphs 1 through 33 of the General Allegations are restated and realleged as if fully set forth herein.

2. On or about the dates listed below, in Miami-Dade County, in the Southern District of Florida, and elsewhere, the defendants listed below as to each Count, did knowingly and willfully export and attempt to export and cause to export goods, as described in each Count

below, from the United States indirectly to Syria, without having first obtained the required licenses from DOC:

COUNT	APPROX. DATE	DEFENDANTS	GOODS
2	October 15, 2013	ALI CABY, a/k/a "Alex Caby," ARASH CABY, a/k/a "Axel Caby," ADIB ZENO, AMMAR AL MOUNAJED, ZHELYAZ ANDREEV, MIHAELA NENOVA, LYUBKA HRISTOVA, ISKREN GEORGIEV, SYRIAN ARAB AIRLINES, a/k/a "Syrian Air"	One (1) "Bat. Char." Fault Switch, Part No. 120VK01N0GB315
3	October 21, 2013	ALI CABY, a/k/a "Alex Caby," ARASH CABY, a/k/a "Axel Caby," ADIB ZENO, AMMAR AL MOUNAJED, ZHELYAZ ANDREEV, ISKREN GEORGIEV, SYRIAN ARAB AIRLINES, a/k/a "Syrian Air"	One (1) Push-Pull Cable Propeller Power, Part No. 4297515

COUNT	APPROX. DATE	DEFENDANTS	GOODS
4	February 13, 2014	<p style="text-align: center;">ALI CABY, a/k/a "Alex Caby," ARASH CABY, a/k/a "Axel Caby," MARJAN CABY, ADIB ZENO, RIZK ALI, ZHELYAZ ANDREEV, ISKREN GEORGIEV, LYUBKA HRISTOVA, and SYRIAN ARAB AIRLINES, a/k/a "Syrian Air"</p>	<p style="text-align: center;">Three (3) "Fuel Temp." Transmitters/Sensors, Part No. 8316-103-00-10</p>
5	February 13, 2014	<p style="text-align: center;">ALI CABY, a/k/a "Alex Caby," ARASH CABY, a/k/a "Axel Caby," MARJAN CABY, ADIB ZENO, ZHELYAZ ANDREEV, LYUBKA HRISTOVA, MIHAELA NENOVA, and SYRIAN ARAB AIRLINES, a/k/a "Syrian Air"</p>	<p style="text-align: center;">Six (6) Light Indicators, Part No. 900VR02S3D41AQW</p>
6	February 27, 2014	<p style="text-align: center;">ALI CABY, a/k/a "Alex Caby," ARASH CABY, a/k/a "Axel Caby," MARJAN CABY, RIZK ALI, AMMAR AL MOUNAJED, ZHELYAZ ANDREEV, LYUBKA HRISTOVA, and SYRIAN ARAB AIRLINES, a/k/a "Syrian Air"</p>	<p style="text-align: center;">Four (4) Micro Switches, Part No. 6763-01860</p>

COUNT	APPROX. DATE	DEFENDANTS	GOODS
7	March 6, 2014	ALI CABY, a/k/a "Alex Caby," ARASH CABY, a/k/a "Axel Caby," MARJAN CABY, RIZK ALI, AMMAR AL MOUNAJED, ZHELYAZ ANDREEV, LYUBKA HRISTOVA, and SYRIAN ARAB AIRLINES, a/k/a "Syrian Air"	One (1) Micro Switch, Part No. 6763-01860

In violation of Title 50, United States Code, Sections 1705(a) and (c); Title 15, Code of Federal Regulations, Part 746.9(a); and Title 18, United States Code, Section 2.

COUNT 8
Conspiracy to Defraud the United States
(18 U.S.C. § 371)

1. Paragraphs 1, 3-5, 11, 13-18, 25-27 and 34 of the General Allegations are restated and realleged as if fully set forth herein.

2. Beginning as early as in or around September 2014, the exact date being unknown to the Grand Jury, and continuing through in or around July 2015, in Miami-Dade County, in the Southern District of Florida, and elsewhere, the defendants,

**ARASH CABY,
a/k/a "Axel Caby,"
MARJAN CABY,
MIHAELA NENOVA,
and
IVAN SERGIEV,**

did knowingly and willfully combine, conspire, confederate, and agree with each other and with others known to the Grand Jury to defraud the United States for the purpose of impeding, impairing, obstructing, and defeating the lawful Government functions of DOC and DHS in the enforcement of laws and regulations prohibiting submission of false and misleading information in the SED and AES, namely, Title 13, United States Code, Section 305.

PURPOSE AND OBJECT OF THE CONSPIRACY

3. The purpose and object of the conspiracy was to unlawfully defraud and mislead DOC and DHS about the ultimate destination of goods in order to export the goods from the United States through a transshipment point to China.

MANNER AND MEANS OF THE CONSPIRACY

The manner and means by which the defendants and their co-conspirators sought to accomplish the purpose and object of the conspiracy included, among others, the following:

4. The co-conspirators would use email accounts and other forms of communication to communicate with each other between the United States and Bulgaria.

5. Some of the co-conspirators would conceal the true destination of the purchased goods by transshipping the goods from the United States to Bulgaria with the intent to ultimately reexport the goods to China.

6. Some of the co-conspirators provided false, misleading, and incomplete information, such as electronic export information (EEI) in AES records, end-use statements, and other documents.

OVERT ACTS

In furtherance of this conspiracy, and to accomplish its purpose and object, at least one of

the conspirators committed or caused to be committed, in the Southern District of Florida and elsewhere, at least one of the following overt acts, among others:

1. On or about September 25, 2014, an aviation technology company in Chengdu, China, sent a sales contract to **NENOVA** to order a tactical air navigation accessory unit, PN T-1401, for \$9,800.00.

2. On or about September 26, 2014, **NENOVA** sent to the aviation technology company in Chengdu, China, PIs 2957 and 2958 for the sale of the tactical air navigation accessory unit.

3. On or about September 29, 2014, and November 17, 2014, **ARASH CABY** and **NENOVA** obtained proof of payment from the aviation technology company in Chengdu, China, for PIs 2957 and 2958.

4. On or about October 9, 2014, **NENOVA** signed an end-use statement for the United States vendor of the tactical air navigation accessory unit falsely stating that the final destination of the goods was "USA."

5. On or about October 15, 2014, **SERGIEV** sent an email to **NENOVA** forwarding another email from the United States vendor stating that the equipment "is ITAR controlled and requires an export license from State Department if exported." (The "ITAR" is the International Traffic in Arms Regulation, 22 C.F.R. §§ 120-130, a U.S. regulation listing "defense articles" for which a State Department license is required for export from the United States.)

6. On or about November 5, 2014, **SERGIEV** sent an email to an employee of AW-TRONICS in Miami requesting that a letter be sent to the United States vendor falsely stating

that the equipment would not be exported outside the United States.

7. On or about November 5, 2014, **ARASH CABY** sent an email stating “Good job guys” to employees of AW-TRONICS for submitting the letter to the United States vendor falsely stating that the equipment would not be exported outside of the United States.

8. On or about November 18, 2014, after the United States vendor shipped the tactical air navigation accessory unit to AW-TRONICS in Miami, an AW-TRONICS employee sent an email to **MARJAN CABY**, **ARASH CABY**, and **ALI CABY** providing instructions for its shipment to Sofia.

9. On or about November 19, 2014, **MARJAN CABY** filed EEI/SED falsely stating that the country of ultimate designation for the tactical air navigation accessory unit was Bulgaria.

10. On or about November 24, 2014, **NENOVA** sent an email to the aviation technology company in Chengdu, China, confirming the shipment of the tactical air navigation unit from Bulgaria to China.

11. On or about December 8, 2014, **NENOVA** received an email from the aviation technology company in Chengdu, China, stating “I have received your equipment.”

12. On or about June 29, 2015, **NENOVA** sent an email to **ARASH CABY** titled “PO to [vendor] for the Aeroflex T-1401 – End user form” and stating:

As you are aware this Taylor guy you are in contact with wants us to fill in End User form for the export license. . [.] Anyway, I have an End user form from my client but he is in China and the item is restricted to be sold outside USA. Last time Ivan and Julian ‘made’ an End user form stating that the Aeroflex will not be exported so we need to do the same thing this time.

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

COUNT 9
Smuggling of Goods
(18 U.S.C. § 554(a))

On or about November 19, 2014, in Miami-Dade County, in the Southern District of Florida, and elsewhere, the defendants,

ARASH CABY,
a/k/a “Axel Caby,”
MARJAN CABY,
MIHAELA NENOVA,
and
IVAN SERGIEV,

did knowingly and fraudulently export and send and attempt to export and send from the United States indirectly to China an article, object, and merchandise, that is, a tactical air navigation accessory unit, PN T-1401, contrary to law and regulations of the United States, namely, Title 13, United States Code, Section 305; in violation of Title 18, United States Code, Sections 554(a) and 2.

COUNT 10
Filing False or Misleading Electronic Export Information
(13 U.S.C. § 305)

On or about November 19, 2014, in Miami-Dade County, in the Southern District of Florida, and elsewhere, the defendants,

MARJAN CABY

did knowingly submit and cause the submission of false and misleading electronic export information (EEI) through the Automated Export System (AES), by stating that the country of ultimate destination of a shipment of a tactical air navigation accessory unit, PN T-1401, was Bulgaria, when in truth and in fact, and as the defendants then and there well knew, the country

of ultimate destination of the shipment was not Bulgaria, in violation of Title 13, United States Code, Section 305, and Title 18, United States Code, Section 2.

COUNT 11
False Statements
(18 U.S.C. § 1001(a)(2))

On or about July 2, 2014, in Miami-Dade County, in the Southern District of Florida, in a matter within the jurisdiction of DOC, an agency of the executive branch of the Government of the United States, the defendant,

MARJAN CABY,

did knowingly and willfully make a false, fictitious, and fraudulent statement and representation as to a material fact during an interview with Special Agents of the DOC, in that she represented that she did not know anything about a company named “Arrowtronic,” when in truth and in fact, and as the defendant then and there well knew, she did know a company named “Arrowtronic,” in violation of Title 18, United States Code, Section 1001(a)(2).

COUNT 12
False Statements
(18 U.S.C. § 1001(a)(2))

On or about November 10, 2015, in Miami-Dade County, in the Southern District of Florida, in a matter within the jurisdiction of the Federal Bureau of Investigation (FBI), an agency of the executive branch of the Government of the United States, the defendant,

ALI CABY,
a/k/a “Alex Caby,”

did knowingly and willfully make a false, fictitious, and fraudulent statement and representation as to a material fact during an interview with Special Agents of the FBI, in that he represented

that AW-TRONICS did not deal with Syria, when in truth and in fact, and as the defendant then and there well knew, AW-TRONICS did deal with Syria, in violation of Title 18, United States Code, Section 1001(a)(2).

COUNT 13
Conspiracy to Commit Money Laundering
(18 U.S.C. § 1956(h))

Beginning as early as in or around September 2013, the exact date being unknown to the Grand Jury, and continuing through on or about November 26, 2013, in Miami-Dade County, in the Southern District of Florida, and elsewhere, the defendants,

ALI CABY,
a/k/a “Alex Caby,”
and
ARASH CABY,
a/k/a “Axel Caby,”

did knowingly combine, conspire, confederate, and agree with each other, and with others known to the Grand Jury, to transmit and transfer funds to a place in the United States from and through a place outside the United States, knowing that the funds represented the proceeds of some form of unlawful activity and knowing that such transfer was designed in part to conceal and disguise the nature, location, source, ownership and control of the proceeds of a specified unlawful activity, namely, a conspiracy to violate IEEPA as alleged in Count 1 of this Indictment, and with the intent to promote the carrying on of the same specified unlawful activity, in violation of Title 18, United States Code, Section 1956(a)(2)(A) and (B)(i); all in violation of Title 18, United States Code, Section 1956(h).

FORFEITURE ALLEGATIONS

1. The allegations of this Indictment are re-alleged and by this reference fully

incorporated herein for the purpose of alleging forfeiture to the United States of America of property in which one or more of the defendants **ALI CABY**, a/k/a “**Alex Caby**,” **ARASH CABY**, a/k/a “**Axel Caby**,” **MARJAN CABY**, **ADIB ZENO**, **RIZK ALI**, **AMMAR AL MOUNAJED**, **ZHELYAZ ANDREEV**, **MIHAELA NENOVA**, **LYUBKA HRISTOVA**, **ISKREN GEORGIEV**, **IVAN SERGIEV**, and **SYRIAN ARAB AIRLINES**, a/k/a “**Syrian Air**,” have an interest.

2. Upon conviction of a violation of Title 50, United States Code, Section 1705(a), a conspiracy to commit such violation, or Title 18, United States Code, Section 554, as alleged in this Indictment, the defendant so convicted shall forfeit to the United States the following property:

- a. any property, real and personal, which constitutes or is derived from proceeds traceable to such violation, pursuant to Title 18, United States Code, Section 981(a)(1)(C); and
- b. any merchandise exported or sent from the United States or attempted to be exported or sent from the United States contrary to law, or the proceeds or value thereof, and property used to facilitate the exporting or sending of such merchandise, the attempted exporting or sending of such merchandise, or the receipt, purchase, transportation, concealment, or sale of such merchandise prior to exportation, pursuant to Title 19, United States Code, Section 1595a(d).

3. Upon conviction of a violation of Title 13, United States Code, Section 305, as alleged in this Indictment, the defendant so convicted shall forfeit to the United States the following property pursuant to Title 13, United States Code, Section 305(a)(3):

- a. any interest in, security of, claim against, or property or contractual rights of any kind in the goods or tangible items that were the subject of the violation;
- b. any interest in, security of, claim against, or property or contractual rights of any kind in tangible property that was used in the export or attempt to export that was the subject of the violation; and
- c. any property constituting, or derived from, any proceeds obtained directly or indirectly as a result of the violation.

4. Upon conviction of a violation of Title 18, United States Code, Section 1956, as alleged in this Indictment, the defendant so convicted shall forfeit to the United States any property, real or personal, involved in such violation, or any property traceable to such property, pursuant to Title 18, United States Code, Section 982(a)(1).

5. The property subject to forfeiture includes a forfeiture money judgment in a sum of money equal in value to: any property constituting or derived from any proceeds traced to or obtained as a result of the violations, any goods or tangible items that were the subject of the violations, any tangible property that was used in the export or attempt to export, any property used to facilitate the exporting or sending of merchandise that was the subject of the violations, or the attempt thereof, or the receipt, purchase, transportation, concealment, or sale of such

merchandise prior to exportation, and any property involved in the money laundering violation, or any property traceable to such property.

All pursuant to Title 13, United States Code, Section 305(a)(3), Title 18, United States Code, Sections 981(a)(1)(C) and 982(a)(1), Title 19, United States Code, Section 1595a(d), the procedures set forth at Title 21, United States Code, Section 853, and Title 28, United States Code, Section, 2461(c).

A TRUE BILL ^

FOREPERSON → _____



WIFREDO A. FERRER
UNITED STATES ATTORNEY



RICARDO A. DEL TORO
ASSISTANT UNITED STATES ATTORNEY

UNITED STATES OF AMERICA

CASE NO. _____

vs.

CERTIFICATE OF TRIAL ATTORNEY*

ALI CABY,
 a/k/a "Alex Caby," et al.,

Defendants. /

Superseding Case Information:

Court Division: (Select One)

X Miami Key West
 FTL WPB FTP

New Defendant(s) Yes No
 Number of New Defendants _____
 Total number of counts _____

I do hereby certify that:

1. I have carefully considered the allegations of the indictment, the number of defendants, the number of probable witnesses and the legal complexities of the Indictment/Information attached hereto.
2. I am aware that the information supplied on this statement will be relied upon by the Judges of this Court in setting their calendars and scheduling criminal trials under the mandate of the Speedy Trial Act, Title 28 U.S.C. Section 3161.
3. Interpreter: (Yes or No) No
 List language and/or dialect _____
4. This case will take 15 days for the parties to try.
5. Please check appropriate category and type of offense listed below:

(Check only one)	(Check only one)
I 0 to 5 days <u> </u>	Petty <u> </u>
II 6 to 10 days <u> </u>	Minor <u> </u>
III 11 to 20 days <u> X </u>	Misdem. <u> </u>
IV 21 to 60 days <u> </u>	Felony <u> X </u>
V 61 days and over <u> </u>	


6. Has this case been previously filed in this District Court? (Yes or No) No

If yes: Judge: Case No. _____
 (Attach copy of dispositive order)
 Has a complaint been filed in this matter? (Yes or No) No
 If yes: Magistrate Case No. _____
 Related Miscellaneous numbers: _____
 Defendant(s) in federal custody as of _____
 Defendant(s) in state custody as of _____
 Rule 20 from the District of _____

Is this a potential death penalty case? (Yes or No) No

7. Does this case originate from a matter pending in the Northern Region of the U.S. Attorney's Office prior to October 14, 2003? Yes X No

8. Does this case originate from a matter pending in the Central Region of the U.S. Attorney's Office prior to September 1, 2007? Yes X No



 RICARDO A. DEL TORO
 ASSISTANT UNITED STATES ATTORNEY
 Florida Bar No. 957585

*Penalty Sheet(s) attached

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA

PENALTY SHEET

Defendant's Name: ALI CABY, a/k/a "Alex Caby"

Case No: _____

Count #: 1

Conspiracy to Violate IEEPA and to Defraud the United States

Title 18, United States Code, Section 371

***Max. Penalty:** 5 years' imprisonment, 3 years' supervised release, \$250,000 fine

Counts #: 2-7

Export and Attempted Export to an Embargoed Country

Title 50, United States Code, Section 1705

*** Max. Penalty:** 20 years' imprisonment, 5 years' supervised release, \$1,000,000 fine

Count #: 12

False Statement

Title 18, United States Code, Section 1001(a)(2)

***Max. Penalty:** 5 years' imprisonment, 3 years' supervised release, \$250,000 fine

Count #: 13

Conspiracy to Commit Money Laundering

Title 18, United States Code, Section 1956(h)

***Max. Penalty:** 20 years' imprisonment, 5 years' supervised release, \$1,000,000 fine

***Refers only to possible term of incarceration, does not include possible fines, restitution, special assessments, parole terms, or forfeitures that may be applicable.**

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA

PENALTY SHEET

Defendant's Name: ARASH CABY, a/k/a "Axel Caby"

Case No: _____

Count #:1

Conspiracy to Violate IEEPA and to Defraud the United States

Title 18, United States Code, Section 371

***Max. Penalty:** 5 years' imprisonment, 3 years' supervised release, \$250,000 fine

Counts #: 2-7

Export and Attempted Export to an Embargoed Country

Title 50, United States Code, Section 1705

*** Max. Penalty:** 20 years' imprisonment, 5 years' supervised release, \$1,000,000 fine

Count #: 8

Conspiracy to Defraud the United States

Title 18, United States Code, Section 371

***Max. Penalty:** 5 years' imprisonment, 3 years' supervised release, \$250,000 fine

Count #: 9

Smuggling of Goods

Title 18, United States Code, Section 554(a)

***Max. Penalty:** 10 years' imprisonment, 3 years' supervised release, \$250,000 fine

***Refers only to possible term of incarceration, does not include possible fines, restitution, special assessments, parole terms, or forfeitures that may be applicable.**

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA

PENALTY SHEET

Defendant's Name: ARASH CABY, a/k/a "Axel Caby"

Case No: _____

Count #: 13

Conspiracy to Commit Money Laundering _____

Title 18, United States Code, Section 1956(h) _____

***Max. Penalty:** 20 years' imprisonment, 5 years' supervised release, \$1,000,000 fine

***Refers only to possible term of incarceration, does not include possible fines, restitution, special assessments, parole terms, or forfeitures that may be applicable.**

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA

PENALTY SHEET

Defendant's Name: MARJAN CABY

Case No: _____

Count #: 1

Conspiracy to Violate IEEPA and to Defraud the United States

Title 18, United States Code, Section 371

***Max. Penalty: 5 years' imprisonment, 3 years' supervised release, \$250,000 fine**

Counts #: 4-7

Export and Attempted Export to an Embargoed Country

Title 50, United States Code, Section 1705

*** Max. Penalty: 20 years' imprisonment, 5 years' supervised release, \$1,000,000 fine**

Count #: 8

Conspiracy to Defraud the United States

Title 18, United States Code, Section 371

***Max. Penalty: 5 years' imprisonment, 3 years' supervised release, \$250,000 fine**

Count #:9

Smuggling of Goods

Title 18, United States Code, Section 554(a)

***Max. Penalty: 10 years' imprisonment, 3 years' supervised release, \$250,000 fine**

***Refers only to possible term of incarceration, does not include possible fines, restitution, special assessments, parole terms, or forfeitures that may be applicable.**

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA

PENALTY SHEET

Defendant's Name: MARJAN CABY

Case No: _____

Count #: 10

Submission of False or Misleading Information

Title 13, United States Code, Section 305

***Max. Penalty: 5 years' imprisonment, 3 years' supervised release, \$250,000 fine**

Count #: 11

False Statement

Title 18, United States Code, Section 1001(a)(2)

***Max. Penalty: 5 years' imprisonment, 3 years' supervised release, \$250,000 fine**

***Refers only to possible term of incarceration, does not include possible fines, restitution, special assessments, parole terms, or forfeitures that may be applicable.**

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA

PENALTY SHEET

Defendant's Name: ADIB ZENO

Case No: _____

Count #: 1

Conspiracy to Violate IEEPA and to Defraud the United States

Title 18, United States Code, Section 371

***Max. Penalty: 5 years' imprisonment, 5 years' supervised release, \$250,000 fine**

Counts #: 2-5

Export and Attempted Export to an Embargoed Country

Title 50, United States Code, Section 1705

*** Max. Penalty: 20 years' imprisonment, 5 years' supervised release, \$1,000,000 fine**

***Refers only to possible term of incarceration, does not include possible fines, restitution, special assessments, parole terms, or forfeitures that may be applicable.**

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA**

PENALTY SHEET

Defendant's Name: RIZK ALI

Case No: _____

Count #: 1

Conspiracy to Violate IEEPA and to Defraud the United States

Title 18, United States Code, Section 371

***Max. Penalty: 5 years' imprisonment, 3 years' supervised release, \$250,000 fine**

Counts #: 4, 6-7

Attempted Export to an Embargoed Country

Title 50, United States Code, Section 1705

*** Max. Penalty: 20 years' imprisonment, 5 years' supervised release, \$1,000,000 fine**

***Refers only to possible term of incarceration, does not include possible fines, restitution, special assessments, parole terms, or forfeitures that may be applicable.**

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA

PENALTY SHEET

Defendant's Name: AMMAR AL MOUNAJED

Case No: _____

Count #: 1

Conspiracy to Violate IEEPA and to Defraud the United States

Title 18, United States Code, Section 371

***Max. Penalty: 5 years' imprisonment, 3 years' supervised release, \$250,000 fine**

Counts #: 2-3, 6-7

Export and Attempted Export to an Embargoed Country

Title 50, United States Code, Section 1705

*** Max. Penalty: 20 years' imprisonment, 5 years' supervised release, \$1,000,000 fine**

***Refers only to possible term of incarceration, does not include possible fines, restitution, special assessments, parole terms, or forfeitures that may be applicable.**

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA

PENALTY SHEET

Defendant's Name: ZHELYAZ ANDREEV

Case No: _____

Count #: 1

Conspiracy to Violate IEEPA and to Defraud the United States

Title 18, United States Code, Section 371

*Max. Penalty: 5 years' imprisonment, 3 years' supervised release, \$250,000 fine

Counts #: 2-7

Export and Attempted Export to an Embargoed Country

Title 50, United States Code, Section 1705

* Max. Penalty: 20 years' imprisonment, 5 years' supervised release, \$1,000,000 fine

***Refers only to possible term of incarceration, does not include possible fines, restitution, special assessments, parole terms, or forfeitures that may be applicable.**

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA

PENALTY SHEET

Defendant's Name: MIHAELA NENOVA

Case No: _____

Count #: 1

Conspiracy to Violate IEEPA and to Defraud the United States

Title 18, United States Code, Section 371

***Max. Penalty:** 5 years' imprisonment, 3 years' supervised release, \$250,000 fine

Counts #: 2,5

Export and Attempted Export to an Embargoed Country

Title 50, United States Code, Section 1705

*** Max. Penalty:** 20 years' imprisonment, 5 years' supervised release, \$1,000,000 fine

Count #: 8

Conspiracy to Defraud the United States

Title 18, United States Code, Section 371

***Max. Penalty:** 5 years' imprisonment, 3 years' supervised release, \$250,000 fine

Count #: 9

Smuggling of Goods

Title 18, United States Code, Section 554(a)

***Max. Penalty:** 10 years' imprisonment, 3 years' supervised release, \$250,000 fine

***Refers only to possible term of incarceration, does not include possible fines, restitution, special assessments, parole terms, or forfeitures that may be applicable.**

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA

PENALTY SHEET

Defendant's Name: LYUBKA HRISTOVA

Case No: _____

Count #: 1

Conspiracy to Violate IEEPA and to Defraud the United States

Title 18, United States Code, Section 371

***Max. Penalty:** 5 years' imprisonment, 3 years' supervised release, \$250,000 fine

Counts #: 2, 4-7

Export and Attempted Export to an Embargoed Country

Title 50, United States Code, Section 1705

*** Max. Penalty:** 20 years' imprisonment, 5 years' supervised release, \$1,000,000 fine

***Refers only to possible term of incarceration, does not include possible fines, restitution, special assessments, parole terms, or forfeitures that may be applicable.**

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA

PENALTY SHEET

Defendant's Name: ISKREN GEORGIEV

Case No: _____

Count #: 1

Conspiracy to Violate IEEPA and to Defraud the United States

Title 18, United States Code, Section 371

***Max. Penalty:** 5 years' imprisonment, 3 years' supervised release, \$250,000 fine

Counts #: 2-4

Export and Attempted Export to an Embargoed Country

Title 50, United States Code, Section 1705

*** Max. Penalty:** 20 years' imprisonment, 5 years' supervised release, \$1,000,000 fine

***Refers only to possible term of incarceration, does not include possible fines, restitution, special assessments, parole terms, or forfeitures that may be applicable.**

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA

PENALTY SHEET

Defendant's Name: IVAN SERGIEV

Case No: _____

Count #: 8

Conspiracy to Defraud the United States

Title 18, United States Code, Section 371

***Max. Penalty: 5 years' imprisonment, 3 years' supervised release, \$250,000 fine**

Count #: 9

Smuggling of Goods

Title 18, United States Code, Section 554(a)

***Max. Penalty: 5 years' imprisonment, 3 years' supervised release, \$250,000 fine**

***Refers only to possible term of incarceration, does not include possible fines, restitution, special assessments, parole terms, or forfeitures that may be applicable.**

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA

PENALTY SHEET

Defendant's Name: SYRIAN ARAB AIRLINES, a/k/a "Syrian Air"

Case No: _____

Count #: 1

Conspiracy to Violate IEEPA and to Defraud the United States

Title 18, United States Code, Section 371

***Max. Penalty:** \$250,000 fine

Counts #: 2-7

Export and Attempted Export to an Embargoed Country

Title 50, United States Code, Section 1705

*** Max. Penalty:** \$1,000,000 fine

***Refers only to possible term of incarceration, does not include possible fines, restitution, special assessments, parole terms, or forfeitures that may be applicable.**