

NSD UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

-----X  
UNITED STATES OF AMERICA

- v. -

RAFAT AMIROV,  
a/k/a "Farkhaddin Mirzoev,"  
a/k/a "Рим,"  
a/k/a "Rome,"  
POLAD OMAROV,  
a/k/a "Araz Aliyev,"  
a/k/a "Novruz Novruzzade,"  
a/k/a "Polad Qaqa,"  
a/k/a "Haci Qaqa,"  
ZIALAT MAMEDOV,  
a/k/a "Ziko,"  
a/k/a "Ruslan Novruzzade,"  
RUHOLLAH BAZGHANDI,  
a/k/a "Roohollah Azimi,"  
FNU LNU,  
a/k/a "Haj Taher,"  
HOSSEIN SEDIGHI, and  
SEYED MOHAMMAD FOROUZAN,  
  
Defendants.

**SEALED SUPERSEDING  
INDICTMENT**

S8 22 Cr. 438 (CM)

-----X  
**BACKGROUND**

1. The Government of the Islamic Republic of Iran ("Iran") is actively targeting nationals of the United States and its allies living in countries around the world for kidnapping and/or execution, in order to repress and silence dissidents critical of the Iranian regime. As part of that campaign of terror, for at least approximately several years, the Government of Iran has attempted to assassinate, on U.S. soil, a victim (the "Victim") residing in New York City. The Victim is a prolific journalist, author, human rights activist, and prominent

critic of the Iranian regime. Through her public works, the Victim has publicized the Government of Iran's human rights abuses; discriminatory treatment of women; suppression of democratic participation and expression; and use of arbitrary imprisonment, torture, and execution to target its political opponents; and has sought to mobilize public opinion in Iran and around the world to bring about changes to the regime's laws and practices, including in connection with the continuing protests against the regime across Iran.

2. Because of the Victim's criticism of the Government of Iran, in approximately 2020 and 2021, an Iranian government intelligence service plotted to kidnap the Victim from within the United States for rendition to Iran and likely execution. In July 2021, following an investigation of that plot, an indictment returned by a grand jury in the Southern District of New York was unsealed charging an Iranian intelligence officer and three Iranian intelligence assets with kidnapping conspiracy and other offenses based on their participation in the plot against the Victim. *See United States v. Farahani, et al.*, 21 Cr. 430 (RA). As alleged in that indictment, between at least June 2020 and 2021, the defendants conducted online research regarding the Victim's residence, hired a New York private investigator under false pretenses to procure photographs and video surveillance of the Victim and the Victim's home and household members on numerous occasions, and researched routes of exfiltration out of New York and to Venezuela and Iran.

3. During the period from approximately July 2021, when the *Farahani* plot was exposed, through at least in or about 2022, RUHOLLAH BAZGHANDI, a/k/a "Roohollah Azimi," FNU LNU, a/k/a "Haj Taher" (herein, "HAJ TAHER"), HOSSEIN SEDIGHI, and SEYED MOHAMMAD FOROUZAN, the defendants, and collectively referred to herein as the

“Bazghandi Network,” continued to research, monitor, and target the Victim, in furtherance of the Government of Iran’s targeting efforts.

4. As part of this effort, members of the Bazghandi Network also researched the individuals they contracted to carry out the murder of the Victim, including RAFAT AMIROV, a/k/a “Farkhaddin Mirzoev,” a/k/a “Рим,” a/k/a “Rome,” the defendant, who, as set forth below, was a leader of an Eastern European criminal organization (the “Organization”) with ties to Iran who, in 2022, was enlisted to assassinate the Victim in the United States. The members of the Organization, including AMIROV, POLAD OMAROV, a/k/a “Araz Aliyev,” a/k/a “Novruz Novruzzade,” a/k/a “Polad Qaqa,” a/k/a “Haci Qaqa,” and ZIALAT MAMEDOV, a/k/a “Ziko,” a/k/a “Ruslan Novruzzade,” the defendants, engage in a variety of criminal activity in the United States and abroad, including theft, extortion, assault, kidnapping, and murder. The members of the Organization identify themselves as “Thieves-in-Law” or as followers of Thieves-in-Law; frequently refer to each other as “Oğru,” or “Thief,” in Azeri; and mark themselves as members of the Organization with tattoos of eight-pointed stars and the use of symbols of eight-pointed stars in photographs, videos, and elaborate portrait cakes of members of the Organization.

5. The Organization’s participation in the murder-for-hire plot was directed by RAFAT AMIROV, a/k/a “Farkhaddin Mirzoev,” a/k/a “Рим,” a/k/a “Rome,” the defendant, a leader of the Organization who resides in Iran and who was tasked with targeting the Victim by individuals in Iran. AMIROV directed POLAD OMAROV, a/k/a “Araz Aliyev,” a/k/a “Novruz Novruzzade,” a/k/a “Polad Qaqa,” a/k/a “Haci Qaqa,” the defendant, a member of the Organization who was residing in Eastern Europe. OMAROV, in turn, together with ZIALAT MAMEDOV, a/k/a “Ziko,” a/k/a “Ruslan Novruzzade,” a member of the Organization and close associate of OMAROV’s, directed and collaborated with Khalid Mehdiyev, a co-conspirator not named as a

defendant herein ("Mehdiyev"), who was residing in Yonkers, New York, to carry out the plot against the Victim. AMIROV and OMAROV arranged for the payment of \$30,000 in cash to Mehdiyev and, after Mehdiyev confirmed to OMAROV that he had received the payment, OMAROV in turn confirmed the payment to MAMEDOV. Immediately following the payment, Mehdiyev procured an AK-47-style assault rifle for carrying out the murder. At AMIROV's, OMAROV's, and MAMEDOV's instructions, Mehdiyev covertly surveilled the Victim and members of the Victim's family; took photographs and videos of the Victim's residence in Brooklyn and the surrounding neighborhood; and devised schemes to lure the Victim out of the Victim's house. For example, as Mehdiyev provided real-time updates to OMAROV and MAMEDOV from a location outside the Victim's residence, MAMEDOV directed Mehdiyev to conduct surveillance from a location where the Victim would not be able to see him, and encouraged Mehdiyev not to delay carrying out the murder. Mehdiyev's participation in the plot was disrupted when he was arrested near the Victim's home in July 2022 while in possession of the assault rifle, which had an obliterated serial number. At the time of the arrest, Mehdiyev, at the direction of AMIROV and OMAROV, was preparing imminently to execute the attack on the Victim. Following Mehdiyev's arrest, OMAROV and MAMEDOV continued to communicate with Mehdiyev, and updated each other and AMIROV as to the status of the plot against the Victim while Mehdiyev was in prison; and, in turn, AMIROV communicated with SEYED MOHAMMAD FOROUZAN, the defendant, about the Victim. In the months that followed Mehdiyev's arrest, FOROUZAN, HOSSEIN SEDIGHI, and HAJ TAHER, the defendants, communicated with one another about payment for the murder plot, and continued to monitor the Victim.



## **PRIOR IRANIAN GOVERNMENT PLOTS AGAINST THE VICTIM**

6. In recent years, the Government of Iran has targeted dissidents around the world, such as the Victim, who oppose the regime's violations of human rights, suppression of democratic participation and freedom of expression, and corruption. The Iranian government has sought to repress such opposition to the regime by targeting dissidents for harassment, intimidation, incarceration, kidnapping, and death. The Victim has long been a target of the Government of Iran. For example:

a. In approximately 2018, Iranian government officials attempted to induce relatives of the Victim, who reside in Iran, to invite the Victim to travel to a third country, for the apparent purpose of having the Victim arrested or detained and transported to Iran for imprisonment. Iranian government officials offered to pay the Victim's relatives in exchange for their invitation to the Victim, but the Victim's relatives did not accept the offer.

b. On or about July 29, 2019, the Chief of the Revolutionary Courts in Iran publicly stated that anyone who sent videos considered against the regime, in particular videos contrary to the Government of Iran's criminal laws mandating that women and girls wear head coverings in public, to the Victim was committing the crime of cooperating with a hostile foreign government and would be sentenced from one to 10 years' imprisonment.

c. In approximately September 2019, a relative of the Victim was arrested by Iranian government officials on charges purportedly based on the relative's association with the Victim. The Victim's relative was later sentenced to eight years' imprisonment.

d. In approximately 2020 and 2021, as described *supra* ¶ 3, an Iranian government intelligence service plotted to kidnap the Victim from within the United States for

rendition to Iran and likely execution, in order to silence the Victim, which resulted in criminal charges in this District. *See United States v. Farahani, et al.*, 21 Cr. 430 (RA) (S.D.N.Y.).

#### **THE ISLAMIC REVOLUTIONARY GUARD CORPS (“IRGC”)**

7. The IRGC is an Iranian military and counterintelligence agency under the authority of Iran’s Supreme Leader and is composed of ground, naval, and air forces, as well as other components—such as IRGC’s Intelligence Organization (“IRGC-IO”); an internal militia, the Basij; and an external operations force, the IRGC-Qods Force (“IRGC-QF”).

8. On or about October 13, 2017, the U.S. Department of the Treasury, Office of Foreign Assets Control (“OFAC”), designated the IRGC as a Specially Designated Global Terrorist under Executive Order No. 13224, relating to global terrorism, for its key role in supporting Iran’s involvement in international terrorism. In its announcement, OFAC noted that the IRGC “has played a central role to Iran becoming the world’s foremost state sponsor of terror.”

9. On or about April 15, 2019, the U.S. Secretary of State designated the IRGC as an FTO under Section 219 of the INA. In announcing the designation, the State Department noted that:

The IRGC FTO designation highlights that Iran is an outlaw regime that uses terrorism as a key tool of statecraft and that the IRGC, part of Iran’s official military, has engaged in terrorist activity or terrorism since its inception 40 years ago. The IRGC has been directly involved in terrorist plotting; its support for terrorism is foundational and institutional, and it has killed U.S. citizens.

10. On or about April 27, 2023, the U.S. Secretary of State designated IRGC-IO as a Specially Designated Global Terrorist under Executive Order No. 14078—the first such use of that authority—relating to hostage-taking and the wrongful detention of U.S. nationals abroad. On the same date, and concurrently with the U.S. Secretary of State’s designation of IRGC-IO, OFAC designated four senior IRGC-IO officials, including RUHOLLAH

BAZGHANDI, a/k/a “Roohollah Azimi,” the defendant, in connection with his involvement with the detention of foreign prisoners held in Iran.

### **THE BAZGHANDI NETWORK DEFENDANTS**

11. RUHOLLAH BAZGHANDI, a/k/a “Roohollah Azimi,” the defendant, is an IRGC Brigadier General who previously served as chief of an IRGC-IO counterintelligence department. As set forth above, *see supra* ¶ 10, BAZGHANDI was first designated, by OFAC, on or about April 27, 2023. In announcing that designation, OFAC stated that BAZGHANDI worked on behalf of the IRGC-IO in several capacities, including his involvement in assassination plots against journalists, Israeli citizens, and others deemed enemies of Iran, as well as his participation in the detention of foreign prisoners held in Iran and involvement in IRGC-IO’s operations in Syria. BAZGHANDI was designated by OFAC for a second time on or about June 1, 2023, this time under Executive Order No. 13224, specifically for his participation in IRGC-IO’s lethal targeting operations. In announcing the designation, OFAC noted that:

Since its inception in 2009, the IRGC-IO has established itself as a domestic and international unit focused on targeting journalists, activists, dual Iranian nationals, and others who oppose the abuses and human rights violations perpetrated by the Iranian regime. Former IRGC-IO Counterespionage Department Chief [Ruhollah] Bazghandi (Bazghandi) has been involved in planning and overseeing IRGC-IO operations in Iraq and Syria as well as lethal operations against Israeli nationals. Bazghandi has also been involved in plots to assassinate journalists and Israeli nationals in Istanbul.

12. Shortly after the charges relating to the *Farahani* plot were unsealed, RUHOLLAH BAZGHANDI, a/k/a “Roohollah Azimi,” the defendant, searched for information relating to the plot by an Iranian intelligence service to kidnap the Victim, and watched a video titled, “The Islamic Republic of Iran plans to transfer [the Victim] to Iran” and a second video titled “A report into the details of the Intelligence Ministry’s plot to kidnap [the Victim].”



13. In addition to his efforts to target the Victim, RUHOLLAH BAZGHANDI, a/k/a “Roohollah Azimi,” the defendant, also has monitored the GOI’s lethal targeting of other perceived enemies of Iran, including, for example, Ruhollah Zam. In October 2019, Iranian national Ruhollah Zam, a resident of France with refugee status, was lured by Iranian intelligence services to leave France. While travelling abroad, Zam was captured by Iranian intelligence services. In a broadcast on Iranian state-owned television on or about October 14, 2019, the IRGC issued a statement announcing that its agents had captured Zam and returned him to Iran, and described Zam’s capture as a “complex operation using intelligence deception.” Zam was thereafter imprisoned in Iran and executed by the Iranian Government in December 2020. In the image on the right, below, BAZGHANDI (left, red circle) is pictured next to Qasem Soleimani (center), a senior IRGC official who was killed by a U.S. drone strike in Baghdad on or about January 3, 2020, and Javad Ghaffari (right), an IRGC-Qods Force (“IRGC-QF”) commander who commanded forces in Syria.



14. In connection with the murder-for-hire plot, RUHOLLAH BAZGHANDI, a/k/a “Roohollah Azimi,” the defendant, communicated with HAJ TAHER, the defendant. In turn,



Haj Taher communicated about the plot with Hossein Sedighi, the defendant, and Seyed Mohammad Forouzan, the defendant. Haj Taher, Sedighi, and Forouzan communicated about providing payment for the murder, and, prior to and following the arrest of Mehdiyev in or about July 2022, each of Haj Taher, Sedighi, and Forouzan searched for information relating to the plot, including about the Victim, Mehdiyev's arrest, and about Rafat Amirov, the defendant.

15. Like Ruhollah Bazghandi, a/k/a "Roohollah Azimi," the defendant, the other members of the Bazghandi Network, Haj Taher, Hossein Sedighi, and Seyed Mohammad Forouzan, the defendants, also have connections to the Government of Iran.

a. Haj Taher is based in Qom, Iran. Using his electronic accounts, Haj Taher has searched for numerous individuals and events connected to the IRGC. For example, on or about January 19, 2023, Haj Taher searched, in Farsi, for "Sardar<sup>1</sup>] Javad Ghaffari"—who is pictured above with Bazghandi and Qasem Soleimani—and viewed a social media page titled, "The Removal of the Commander of the IRGC in Syria," which refers to Ghaffari's dismissal as the commander of Iran's forces in Syria; on or about January 3, 2023, Haj Taher searched, in Farsi, for "Sardar Rabbani," which refers to Mahdi Rabbadi, an IRGC Brigadier General; and, on January 19, 2023, Haj Taher searched, in Farsi, for Sardar Ammar Zadehi, which refers to Mohammad Reza Zahedi, a senior commander in the IRGC-QF, who was designated on or about August 3, 2010 by OFAC under Executive Order No. 13224, in connection with his activities as the commander of IRGC-QF in Lebanon, who played a key role in Iran's support to Hizballah.<sup>2</sup> Like Bazghandi, Haj Taher also searched for materials related to

---

<sup>1</sup> "Sardar" is Farsi for a high-level military rank and can be translated as Commander.

<sup>2</sup> Hizballah, a designated Foreign Terrorist Organization, is a Lebanon-based Shia Islamic organization with political, social, and terrorist components. Hizballah was founded in the early

Ruhollah Zam, the Iranian dissident who, in or about October 2019, was captured by the IRGC in Iraq and later executed in Iran. For example, on or about February 16, 2021, HAJ TAHER watched two videos regarding Zam and his execution; on or about May 4, 2022, HAJ TAHER searched, in Farsi, for “Ruhollah Zam”; and, on or about November 12, 2022, HAJ TAHER watched a video, twice, with the title, “Rohullah Zam Why He Went to Iraq and How He Was Arrested.”

b. SEDIGHI has saved in his contact lists a phone number for “Khatib Minister of Intelligence,” which refers to Esmail Khatib. Khatib has been the head of Iran’s Ministry of Intelligence and Security (“MOIS”) since approximately August 2021. On or about September 9, 2022, Khatib was designated by OFAC under Executive Order No. 13694, in connection with his activities on behalf of MOIS, including directing several networks of cyber threat actors involved in cyber espionage and ransomware attacks in support of Iran’s political goals. On or about September 22, 2022, Khatib was designated by OFAC a second time, this time pursuant to Executive Order No. 13553, in connection with his activities on behalf of MOIS, and, in particular, his involvement in the death of a 22 year-old in Iran who was arrested, detained, and later killed for allegedly wearing a hijab improperly.

c. FOROUZAN has represented himself to have been a member of the Basij, a voluntary auxiliary division of the IRGC. For example, in an email dated on or about January 12, 2015, FOROUZAN wrote, among other things, “from the first year of guidance to the pre-university level, I was the head of the regional council, an active member of the Basij and a member of the Council of the Islamic Association.” A photograph of FOROUZAN is below.

---

1980s with support from Iran after the 1982 Israeli invasion of Lebanon, and its mission includes establishing a fundamentalist Islamic state in Lebanon.



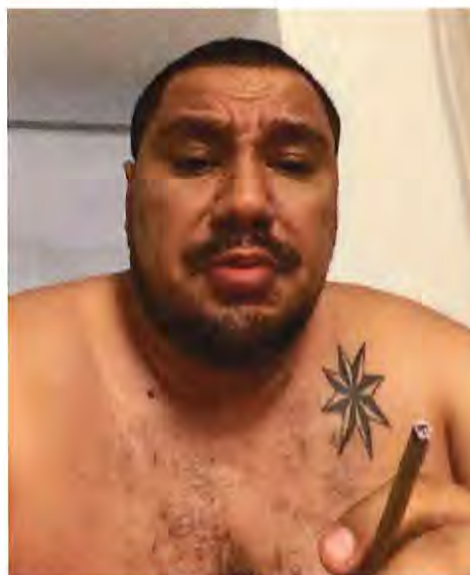
**THE ORGANIZATION DEFENDANTS**

16. RAFAT AMIROV, a/k/a “Farkhaddin Mirzoev,” a/k/a “Рим,” a/k/a “Rome,” the defendant, is a citizen of Azerbaijan and Russia and a leader in the Organization. At all times relevant to the charges in this Indictment, AMIROV resided in Iran. Photographs of AMIROV, who uses false identification documents in other names, are below. In connection with the murder-for-hire plot, AMIROV received targeting information about the Victim from other individuals in Iran and communicated it to POLAD OMAROV, a/k/a “Araz Aliyev,” a/k/a “Novruz Novruzzade,” a/k/a “Polad Qaqa,” a/k/a “Haci Qaqa,” the defendant; received reports from OMAROV about efforts to surveil and target the Victim; arranged for a payment of \$30,000 in cash to Mehdiyev in New York City to buy an assault rifle and carry out the murder; and continued to communicate with OMAROV following Mehdiyev’s arrest regarding Mehdiyev’s arrest and the murder plot.





17. POLAD OMAROV, a/k/a “Araz Aliyev,” a/k/a “Novruz Novruzzade,” a/k/a “Polad Qaqa,” a/k/a “Haci Qaqa,” the defendant, is a citizen of Georgia and also holds a leadership position in the Organization. At all times relevant to the charges in this Indictment, OMAROV resided in Eastern Europe, including Slovenia and the Czech Republic. Photographs of OMAROV, who uses false identification documents in other names, are below. In connection with the murder-for-hire plot, OMAROV received targeting information about the Victim and directions about the plot from RAFAT AMIROV, a/k/a “Farkhaddin Mirzoev,” a/k/a “Рим,” a/k/a “Rome,” the defendant; communicated targeting information about the Victim and directions about the plot to Mehdiyev and ZIALAT MAMEDOV, a/k/a “Ziko,” a/k/a “Ruslan Novruzzade,” the defendant; received reports from Mehdiyev and MAMEDOV about surveillance and targeting of the Victim; communicated such reports and information about surveillance and targeting of the Victim to MAMEDOV and AMIROV; assisted AMIROV in arranging for a payment of \$30,000 in cash to Mehdiyev in New York City to buy an assault rifle and carry out the murder; and continued to communicate with AMIROV, Mehdiyev, and MAMEDOV following Mehdiyev’s arrest regarding Mehdiyev’s arrest and the murder plot.



18. Mehdiyev is a citizen of Azerbaijan, a resident of Yonkers, New York, and a member of the Organization. Photographs of Mehdiyev, who uses bank cards and credit cards in the names of others, are below, including, on the left, a selfie that Mehdiyev took outside the Victim's residence (the "Residence") in Brooklyn while conducting surveillance in furtherance of the murder plot. In connection with the murder-for-hire plot, Mehdiyev received targeting information about the Victim and directions about the plot from POLAD OMAROV, a/k/a "Araz Aliyev," a/k/a "Novruz Novruzzade," a/k/a "Polad Qaqa," a/k/a "Haci Qaqa," and ZIALAT MAMEDOV, a/k/a "Ziko," a/k/a "Ruslan Novruzzade," the defendants; conducted surveillance of the Victim and the Victim's household; communicated reports and information about surveillance and targeting of the Victim to OMAROV and MAMEDOV; received a payment of \$30,000 in cash in furtherance of the plot; procured an AK-47-style assault rifle to carry out the murder; and



continued to provide information to OMAROV and MAMEDOV regarding the plot against the Victim and his imprisonment following his arrest.



19. ZIALAT MAMEDOV, a/k/a “Ziko,” a/k/a “Ruslan Novruzzade,” the defendant, is a citizen of Georgia, and a member of the Organization. At all times relevant to the charges in this Indictment, MAMEDOV resided in Eastern Europe, including Slovenia and the Czech Republic. Photographs of MAMEDOV, who uses false identification documents in other names, are below. In connection with the murder-for-hire plot, MAMEDOV communicated with POLAD OMAROV, a/k/a “Araz Aliyev,” a/k/a “Novruz Novruzzade,” a/k/a “Polad Qaqa,” a/k/a “Haci Qaqa,” the defendant, and Mehdiyev about Mehdiyev’s receipt of the \$30,000 payment, and his acquisition and possession of the AK-47-style assault rifle and surveillance of the Victim in furtherance of the murder-for-hire plot. MAMEDOV also instructed Mehdiyev in connection with Mehdiyev’s surveillance of the Victim, and encouraged Mehdiyev not to delay carrying out the murder. MAMEDOV further communicated with Mehdiyev following Mehdiyev’s arrest and provided information about Mehdiyev’s arrest and imprisonment to OMAROV.





### THE MURDER-FOR-HIRE PLOT

20. Following the failure of the July 2021 plot to kidnap or kill the Victim, and the public unsealing of criminal charges against an Iranian intelligence officer and three Iranian intelligence assets, *see Farahani*, 21 Cr. 430 (RA), members of the Bazghandi Network, including RUHOLLAH BAZGHANDI, a/k/a “Roohollah Azimi,” HAJ TAHER, HOSSEIN SEDIGHI, and SEYED MOHAMMAD FOROUZAN, the defendants, continued efforts to monitor and target the Victim. Beginning in at least July 2022, members of the Organization enlisted by the Government of Iran to target the Victim, RAFAT AMIROV, a/k/a “Farkhaddin Mirzoev,” a/k/a “Рим,” a/k/a “Rome,” POLAD OMAROV, a/k/a “Araz Aliyev,” a/k/a “Novruz Novruzzade,” a/k/a “Polad Qaqa,” a/k/a “Haci Qaqa,” and ZIALAT MAMEDOV, a/k/a “Ziko,” a/k/a “Ruslan Novruzzade,” the defendants, plotted to murder the Victim. During this period, the Bazghandi Network monitored the Victim and the effort to assassinate the Victim. After Mehdiyev was arrested, on or about July 28, 2022, as detailed *supra*, AMIROV continued to discuss the Victim with OMAROV, MAMEDOV, and FOROUZAN. In turn, FOROUZAN communicated about the Victim with other members of the Bazghandi Network. Following the arrests of AMIROV,

OMAROV, and MAMEDOV in January 2022, the Bazghandi Network continued to target the Victim.

**The Bazghandi Network Continues Efforts to Monitor and Target the Victim  
After the July 2021 Kidnapping Plot Fails**

a. Approximately three days after the *Farahani* indictment was unsealed, *see supra* ¶ 2, BAZGHANDI watched a YouTube video, with a title in Farsi, which translates to “The Islamic Republic of Iran plans to transfer [the Victim] to Iran.”<sup>3</sup> Subsequently, in or about July 2021 and again in or about February 2022, BAZGHANDI watched additional videos online that referenced the Victim and the Government of Iran’s efforts to kill or kidnap the Victim.

b. On or about June 6, 2022, FOROUZAN conducted Internet searches for various aliases used by AMIROV, including “ogru rafet” as well as for other individuals connected to the Organization. Additionally, also on or about June 6, 2022, FOROUZAN conducted approximately 34 image searches, in Farsi, for the Victim’s name, and also searched the Victim’s Wikipedia page.

c. Between on or about June 9, 2022 and July 21, 2022, BAZGHANDI exchanged approximately 10 electronic communications with HAJ TAHER. In these communications, they exchanged messages, photographs, and website URLs.

d. On or about July 11, 2022, HAJ TAHER conducted a Google search, in Farsi, which translates to “dollar price today.” A few days later, on or about July 14, 2022, HAJ

---

<sup>3</sup> BAZGHANDI, HAJ TAHER, SEDIGHI, and FOROUZAN communicated, and conducted Internet searches primarily in Farsi. AMIROV, OMAROV, MEHDIYEV, and MAMEDOV communicated primarily in Azeri Turkic. Descriptions of those electronic communications and Internet searches in this Indictment reflect draft English translations of those communications. Throughout this Indictment, all communications are described in substance and in part, and quoted text appears as in the original messages, including any typographical and grammatical errors, except where alterations are indicated.

TAHER conducted another search, also in Farsi, which translates from Farsi to “New York clock difference with Iran,” *i.e.*, the difference between the time in Iran and that in New York. In the weeks that followed, HAJ TAHER conducted additional searches relating to the time differences between New York and Iran, and between Istanbul, Turkey and Tehran, Iran.

e. SEDIGHI sent two screenshots, dated on or about July 13, 2022, of a Google search for a business located approximately one tenth of a mile from the Victim’s residence in Brooklyn, New York, which, as described below, Mehdiyev surveilled at AMIROV’s and OMAROV’s direction, as part of the murder-for-hire plot.

f. Over the ensuing weeks, from on or about July 13, 2022 through Mehdiyev’s arrest on or about July 28, 2022—during which AMIROV, OMAROV, and Mehdiyev plotted to murder the Victim, *see infra*—and in the days following Mehdiyev’s arrest, members of the Bazghandi Network regularly conducted Internet searches for variations of the Victim’s name, the Victim’s spouse’s name, the local time in New York, the Victim’s employer, and videos and news articles about the Victim. Those searches included, for example, “Assassination of [Victim]” on or about July 14, 2022, “[the Victim’s employer] offices in Brooklyn” on or about July 28, 2022, and “The Story of the Abduction of [the Victim]” on or about July 31, 2022.

g. Additionally, and as detailed below, *see supra* ¶¶ 20(mm) – (oo), in or about September and October 2022, HAJ TAHER, SEDIGHI, and FOROUZAN exchanged explicit electronic communications about payment for the murder of the Victim. In particular, saved in HAJ TAHER’s Google account is a message, dated on or about October 4, 2022, from SEDIGHI, addressed to FOROUZAN, stating, in part, “Hello Seyed, this is addressed to you, your masters and your mafia. If until Saturday this does not get concluded, then there is nothing left between us to discuss and it will be out of our hands. You must return the deposit amount,



otherwise the consequences will affect all of you. Until Saturday then. With thanks, Sedighi.” This message post-dated Mehdiyev’s arrest on or about July 28, 2022 and pre-dated the arrests of AMIROV, OMAROV, and MAMEDOV in or about January 2023.

#### **AMIROV Identifies the Victim as the Target**

h. On or about July 13, 2022, AMIROV sent OMAROV electronic communications, addressing OMAROV as “Brother,” with (i) images of the Victim’s Residence from an Internet maps service; (ii) the message “New York”; (iii) the address of the Residence; and (iv) two photographs of the Victim. The images AMIROV sent to OMAROV were forwards, meaning that AMIROV had received them from another sender. The images of the Residence show the time and battery level in Farsi numbers, consistent with the tasking originating from within Iran. After receiving the targeting package, OMAROV subsequently informed AMIROV that “they will send me pictures in 2-3 hours from there.” OMAROV further informed AMIROV that “I have sent them, they are on their way,” referring to having sent Mehdiyev to the Residence, as described below.

i. Also on or about July 13, 2022, the same day that AMIROV forwarded the images described above, and before AMIROV forwarded those images to OMAROV, FOROUZAN conducted Internet searches, including images searches, relating to the Victim.

#### **OMAROV Tasks Mehdiyev with Carrying Out the Murder**

j. On or about July 13, 2022, after receiving the targeting directive from AMIROV, OMAROV sent Mehdiyev photographs of the Victim, the address of the Residence, and images of the Residence that OMAROV had received from AMIROV. Mehdiyev thereafter travelled from Yonkers to Brooklyn, where he took photographs and a video showing

the Residence, which he sent to OMAROV. OMAROV then forwarded these photographs and video to AMIROV.

**AMIROV, OMAROV, and MAMEDOV Arrange a Cash Payment to Mehdiyev**

k. After receiving Mehdiyev's initial surveillance images and video, AMIROV and OMAROV arranged a delivery of \$30,000 in cash to Mehdiyev. On or about July 15, 2022, Mehdiyev sent OMAROV a phone number used by Mehdiyev and the driver's license and name of another individual, who would help Mehdiyev collect the money. OMAROV sent this information to AMIROV.

l. On or about July 18, 2022, AMIROV sent OMAROV a phone number for the person from whom Mehdiyev would collect the money. OMAROV sent the number to Mehdiyev, who then travelled to Brooklyn and collected approximately \$30,000 in cash.

m. Mehdiyev sent OMAROV a photograph of the cash, consisting of several rubber-banded bundles of U.S. currency. OMAROV then informed AMIROV that the cash had been picked up. AMIROV replied, "Let God help him, Amen, God willing!"

n. On or about July 18 and 19, 2022, after collecting the \$30,000 cash payment, Mehdiyev sent approximately \$10,000 to OMAROV's romantic partner in Eastern Europe, using money transfer offices located in the Bronx, New York.

o. On or about August 1, 2022, OMAROV sent MAMEDOV the photograph of cash that OMAROV had received from Mehdiyev on or about July 18, 2022.

**Mehdiyev Procures an AK-47-Style Assault Rifle**

p. On or about July 19, 2022, Mehdiyev acquired an AK-47-style Norinco assault rifle with an obliterated serial number. The morning of on or about July 20, 2022,

Mehdiyev sent a message to one of his housemates: “I bought this thing[,] you’d lose your mind if you saw it 🚫🚫🚫🚫🚫🚫 War machine[,] fuck 🚫🚫🚫🚫”<sup>4</sup>

q. On or about July 23, 2022, Mehdiyev sent MAMEDOV a video taken on the front porch of Mehdiyev’s Yonkers residence, showing the assault rifle located inside a suitcase and displaying two loaded magazines of ammunition. Still images from the video are shown below. MAMEDOV forwarded the video to OMAROV that same day.



**Mehdiyev Surveils the Victim and  
the Defendants Scheme to Lure the Victim Out**

r. Between approximately July 20 and 28, 2022, Mehdiyev travelled repeatedly between his Yonkers residence and Brooklyn to surveil the Victim, the Victim’s household members, and the Victim’s Residence. During these surveillance missions, Mehdiyev photographed and videoed the Residence and provided OMAROV reports on the activities of the

---

<sup>4</sup> This message was in Turkish, and the description in this Indictment reflects a draft English translation.



Victim, which OMAROV in turn communicated to AMIROV. The defendants also schemed ways to draw the Victim out of the Residence to carry out the assassination.

s. On or about July 22, 2022, Mehdiyev sent a message to MAMEDOV stating, "I'm here my brother all is quiet I'm walking around," referring to the area near the Victim's Residence. MAMEDOV responded, "May God bring luck to your work."

t. Later on or about July 22, 2022, Mehdiyev messaged MAMEDOV that "I'm close to the place now brother I'm getting even closer." MAMEDOV responded, "Ok my brother dear don't let her out of your sight[.] Let's not delay it my brother dear," referring to not delaying the planned assassination of the Victim.

u. On or about the morning of July 23, 2022, OMAROV instructed Mehdiyev to "Say God's name and go after your business." Mehdiyev replied that he was leaving to go to the Residence and, approximately two-and-a-half hours later, sent OMAROV Google Maps images of the neighboring house to the Victim's Residence. OMAROV sent the pictures to AMIROV, who replied, "God willing we will hear some good news."

v. On or about the next morning, July 24, 2022, MAMEDOV sent Mehdiyev a message telling him to wake up. Mehdiyev responded, "I'm awake brother I'm going out." Later that day, MAMEDOV messaged Mehdiyev asking how he was doing, and Mehdiyev responded, "Thankfully my brother I'm here waiting," referring to the area near the Victim's Residence.

w. Also on or about the morning of July 24, 2022, OMAROV sent a message to Mehdiyev asking where Mehdiyev was. Mehdiyev responded, "at the crime scene." OMAROV responded, "Ok. You are a man!" Mehdiyev also sent OMAROV the message, "We

blocked it from both sides, it will be a show once she steps out of the house.” OMAROV forwarded this message to AMIROV, who replied, “God willing.”

x. On or about July 25, 2022, Mehdiyev sent MAMEDOV a photograph of the Victim’s Residence. MAMEDOV and Mehdiyev then discussed the target of the murder plot, the Victim. MAMEDOV asked Mehdiyev, “Can that whore see you out of the window?” Mehdiyev responded, “She would need to look really attentively.” MAMEDOV instructed Mehdiyev: “Stand in a spot so that no matter how she looks she wouldn’t be able to see you my brother.”

y. Mehdiyev subsequently returned to the Residence to await an opportunity to carry out the murder. On or about July 26, 2022, Mehdiyev and OMAROV exchanged messages about strategies to bring the Victim to the front door of the Residence, including proposals to ask for flowers from the Victim’s garden, but Mehdiyev reported that the Victim did not come to the door. On or about July 27, 2022, AMIROV sent OMAROV intelligence about the Victim’s activities that AMIROV obtained from a separate source, reporting that “she was talking on the phone from 5:40 till 5:50 in the morning, Iranian time, by the door.”

z. Later on July 27, 2022, OMAROV assured AMIROV, referring to the murder plot, that “[t]his matter is going to be over today, brother. I told them to make a birthday present for me. I pressured them . . . .” AMIROV sent OMAROV an image of two hands pressed together in prayer, as well as links to the Victim’s social media accounts and screenshots of a live stream that the Victim was conducting on a messaging application.

aa. On or about July 28, 2022, Mehdiyev returned to the Victim’s Residence. Mehdiyev sent OMAROV a video recording from inside the car Mehdiyev was driving, showing a suitcase in the back seat. In the video, Mehdiyev pulled the front flap of the



suitcase open to display the AK-47-style assault rifle. Mehdiyev sent the video to OMAROV with a caption stating, “we are ready.” OMAROV forwarded the video to AMIROV, who replied that Mehdiyev should “keep the car clean,” apparently meaning that Mehdiyev should not conduct the shooting of the Victim inside of, or from the inside of, the car in order to prevent forensic evidence of the murder.

bb. On or about July 28, 2022, prior to Mehdiyev’s arrest, HAJ TAHER searched for the “[the Victim’s employer] offices in Brooklyn.”

#### **Mehdiyev Is Arrested with the Assault Rifle**

cc. That day, on or about July 28, 2022, the Victim observed suspicious activity near the Residence and left the area. Mehdiyev left the area approximately 15 minutes later. While driving away, Mehdiyev was stopped by New York City Police Department (“NYPD”) officers after a traffic violation. Inside Mehdiyev’s car, NYPD officers found the assault rifle, two ammunition magazines, and approximately 66 rounds of ammunition, which are shown below, as well as approximately \$1,100 in cash and a black ski mask. Mehdiyev was arrested and publicly charged with a federal firearms offense.



dd. After Mehdiyev's arrest, he was detained pending trial and held at a federal detention center. Mehdiyev obtained a contraband cellphone and used it to communicate with OMAROV and MAMEDOV, among others. Mehdiyev sent to MAMEDOV a photograph of his prisoner identification card and a video of his prison cell as proof of his arrest, and asked for money to buy food and cigarettes.

ee. On or about August 1, 2022, FOROUZAN searched for a video titled, in Farsi, "Khamenei's envoy to [the Victim], who was caught by the American police[.]" and, on or about August 4, 2022, both FOROUZAN and SEDIGHI watched a video with the title, "Who wants to steal [the Victim]." Between on or about August 3 and August 4, 2022, SEDIGHI watched videos with titles in Farsi that translate to, "The Last Details of the Assassination of [the Victim] and "Gunman arrested in front of [the Victim's] home."

ff. On or about August 3, 2022, MAMEDOV sent OMAROV a message referring to Mehdiyev and stating that "he went to kill the journalist." OMAROV then forwarded that message to AMIROV.

gg. On or about August 7, 2022, AMIROV and OMAROV exchanged messages about press coverage of Mehdiyev's arrest. AMIROV wrote to OMAROV, "He has become popular, brother." OMAROV responded, "I hope he will not make trouble for me."

#### **The Bazghandi Network Monitors the Victim and the Fallout of Mehdiyev's Arrest**

hh. On or about August 11, 2022, HAJ TAHER conducted Google searches related to the Government of Iran's earlier effort to kidnap and/or kill the Victim, which was publicly exposed in approximately July 2021, *see Farahani*, 21 Cr. 430 (RA). On that date, HAJ TAHER searched, in Farsi, for "the kidnapping of [the Victim]," as well as for Niloufar Bahadorifar, a U.S.-based co-conspirator who was charged as part of the *Farahani* prosecution.



Additionally, HAJ TAHER viewed an image of a wanted poster made by the Federal Bureau of Investigation for Mahmoud Khazein, another of the charged *Farahani* co-conspirators. In addition to searching for information about the *Farahani* co-conspirators relating to the July 2021 kidnapping plot, on or about August 21, 2022, HAJ TAHER conducted numerous searches for variations of “ogru rafet”—referencing AMIROV and “ogru,” a term the Organization Defendants frequently used to refer to one another—which returned results that included photographs of AMIROV.

ii. On or about August 13, 2022, FOROUZAN conducted Internet searches which, in Farsi, translate to “Khalid Mahdiov’s Court ruling,” and viewed a social media post by the Victim, in which the Victim discusses Mehdiyev’s arrest.

**AMIROV and FOROUZAN Continue to Communicate about the Victim and AMIROV’s Travel Plans to and from Iran**

jj. On or about September 17, 2022, AMIROV and FOROUZAN had a phone call which lasted for approximately six minutes. Approximately five minutes later, FOROUZAN sent an image to AMIROV. Less than a minute later, AMIROV forwarded to OMAROV a message containing a screen capture of the Victim’s face taken from a video stream of an online appearance by the Victim, which occurred near the time the image was forwarded. That message was the only image file exchanged between AMIROV and OMAROV on September 17, 2022. AMIROV had phone calls with both FOROUZAN and OMAROV following the image exchanges on or about September 17, 2022.

kk. On or about September 21, 2022, AMIROV and FOROUZAN exchanged approximately seven phone calls. During the overlapping time period, FOROUZAN sent an image file to AMIROV. That was the only image file AMIROV received on that date prior to, shortly after receiving it from FOROUZAN, forwarding to OMAROV a four-part composite

image, pictured below in redacted form, including a still image of Mehdiyev on the Victim's porch, shortly before he intended to murder the Victim; a cover of a news publication depicting the Victim, with the headline, "'Terror' Plot in B'klyn"; a still image from a media interview the Victim which appended Farsi text; and a screenshot of a web service purporting to monitor a web site containing information about the charges against Mehdiyev in this District.



11. In addition to these communications with AMIROV, FOROUZAN's electronic accounts also contain other information relating to AMIROV. For example, FOROUZAN's contact list included multiple entries for AMIROV, as well as for another co-conspirator not named herein ("CC-1"); additionally, FOROUZAN also saved to an electronic account a number of photographs that appear to be travel documents—including airplane tickets

to and from Imam Khomeini International Airport, the primary airport of Tehran—in the names of “Farkhaddin Mirzoev,” one of AMIROV’s aliases, and CC-1.

**The Bazghandi Network Continues to its Efforts to Target the Victim**

mm. On or about September 27, 2022, SEDIGHI sent an electronic message, in Farsi, which is saved in an email account used by HAJ TAHER, asking whether HAJ TAHER received a number used by FOROUZAN on the electronic messaging system WhatsApp, and stating, “If they contact them directly, it is much better[.]”

nn. On or about October 4, 2022, SEDIGHI sent an electronic message, in Farsi, that read, “Hello Seyed, this is addressed to you, your masters and your mafia. If until Saturday this does not get concluded, then there is nothing left between us to discuss and it will be out of our hands. You must return the deposit amount, otherwise the consequences will affect all of you. Until Saturday then. With thanks, Sedighi.” This message, addressed to [Seyed] FOROUZAN and signed by SEDIGHI, was sent to HAJ TAHER. The Saturday following October 4, 2022, was October 8, 2022. On or about October 7, 2022, HAJ TAHER conducted a Google search, in Farsi, for the Victim’s name.

oo. On or about October 9, 2022, SEDIGHI sent an electronic message to HAJ TAHER, in Farsi, which read, “Hello Haj Taher, thank you for taking this load off of my shoulders for the time being, because I have not had a peaceful day due to your money. I don’t want to be in your debt.” Later that day, also on or about October 9, 2022, HAJ TAHER responded, writing to SEDIGHI, in Farsi, “Hello, don’t worry, our load is on your shoulders. I am sorry. May God be kind to you and yours.”



pp. The image below, picturing AMIROV inside a mosque, has a modified date of on or about October 17, 2022, and was saved to one of FOROUZAN's electronic accounts:



#### **AMIROV and OMAROV are Arrested and the Murder-for-Hire Plot Is Exposed Publicly**

qq. On or about January 4, 2023, authorities in the Czech Republic arrested OMAROV and MAMEDOV. On or about January 26, 2023, AMIROV was taken into custody in the Southern District of New York. On or about January 27, 2023, Indictment S4 22 Cr. 438 (CM) was unsealed, publicly charging AMIROV, OMAROV, and Mehdiyev for their roles in the plot to assassinate the Victim.

#### **The Bazghandi Network Continues to Target the Victim**

rr. In the months following the arrests of AMIROV, OMAROV, and MAMEDOV, and the public exposure of the Organization's plot, at the direction of the Government of Iran, to assassinate the Victim, members of the Bazghandi Network continued to monitor the prosecution of the Organization defendants and continued to target the Victim. For example, on or about January 28, 2023, the day after charges against AMIROV, OMAROV, and Mehdiyev relating to the murder-for-hire plot were unsealed, BAZGHANDI searched for a phrase,



in Farsi, which translates to, “The moment of the arrest of the accused [the Victim].” Approximately two months later, between on or about March 8 through 11, 2023, HAJ TAHER conducted Internet searches for the Victim’s family members; on or about March 15, 2023, SEDIGHI sent an image of the Victim’s address; and, on or about May 1, 2023, BAZGHANDI conducted an Internet search, in Farsi, for, “a person in the house of [the Victim] movie,” and, on the same date, watched a video with the title, “A video of the arrested gunman in front of [the Victim’s] home in New York received by [the Victim’s employer].”

### **STATUTORY ALLEGATIONS**

#### **COUNT ONE** **(Murder-For-Hire)**

The Grand Jury charges:

21. The allegations contained in paragraphs 1 through 20 of this Indictment are repeated and realleged as if fully set forth herein.

22. From at least in or about July 2022, up to and including in or about January 2023, in the Southern District of New York and elsewhere, and in an offense begun and committed in Iran, Azerbaijan, Georgia, Slovenia, and elsewhere out of the jurisdiction of any particular State or district of the United States, RAFAT AMIROV, a/k/a “Farkhaddin Mirzoev,” a/k/a “Рим,” a/k/a “Rome,” POLAD OMAROV, a/k/a “Araz Aliyev,” a/k/a “Novruz Novruzzade,” a/k/a “Polad Qaqa,” a/k/a “Haci Qaqa,” ZIALAT MAMEDOV, a/k/a “Ziko,” a/k/a “Ruslan Novruzzade,” RUHOLLAH BAZGHANDI, a/k/a “Roohollah Azimi,” HAJ TAHER, HOSSEIN SEDIGHI, and SEYED MOHAMMAD FOROUZAN, the defendants, and others known and unknown, at least one of whom was first brought to and arrested in the Southern District of New York, knowingly traveled in and caused another to travel in interstate and foreign commerce, and used and caused another to use a facility of interstate and foreign commerce, with intent that a murder be committed

in violation of the laws of the State of New York or the United States as consideration for the receipt of and as consideration for a promise or agreement to pay anything of pecuniary value, and aided and abetted the same, to wit, (i) AMIROV, OMAROV, and MAMEDOV used cellphones and electronic messaging applications to communicate with each other in furtherance of a plot for Mehdiyev to kill the Victim in New York City in exchange for a cash payment to Mehdiyev arranged by AMIROV, OMAROV, and MAMEDOV, and (ii) BAZGHANDI, HAJ TAHER, SEDIGHI, and FOROUZAN conducted Internet searches for the Victim and for various aliases used by AMIROV, searched for the price of dollars in the United States and the time difference between New York and Iran, and discussed payment for the plot to assassinate the Victim.

(Title 18, United States Code, Sections 1958, 3238, and 2.)

**COUNT TWO**  
**(Conspiracy to Commit Murder-for-Hire)**

The Grand Jury further charges:

23. The allegations contained in paragraphs 1 through 20 of this Indictment are repeated and realleged as if fully set forth herein.

24. From at least in or about July 2022, up to and including in or about January 2023, in the Southern District of New York and elsewhere, and in an offense begun and committed in Iran, Azerbaijan, Georgia, Slovenia, and elsewhere out of the jurisdiction of any particular State or district of the United States, RAFAT AMIROV, a/k/a “Farkhaddin Mirzoev,” a/k/a “Рим,” a/k/a “Rome,” POLAD OMAROV, a/k/a “Araz Aliyev,” a/k/a “Novruz Novruzzade,” a/k/a “Polad Qaqa,” a/k/a “Haci Qaqa,” ZIALAT MAMEDOV, a/k/a “Ziko,” a/k/a “Ruslan Novruzzade,” RUHOLLAH BAZGHANDI, a/k/a “Roohollah Azimi,” HAJ TAHER, HOSSEIN SEDIGHI, and SEYED MOHAMMAD FOROUZAN, the defendants, and others known and unknown, at least one of whom was first brought to and arrested in the Southern District of New York, intentionally

and knowingly did combine, conspire, confederate, and agree together and with each other to commit murder-for-hire, in violation of Title 18, United States Code, Section 1958.

25. It was a part and an object of the conspiracy that RAFAT AMIROV, a/k/a “Farkhaddin Mirzoev,” a/k/a “Рим,” a/k/a “Rome,” POLAD OMAROV, a/k/a “Araz Aliyev,” a/k/a “Novruz Novruzzade,” a/k/a “Polad Qaqa,” a/k/a “Haci Qaqa,” ZIALAT MAMEDOV, a/k/a “Ziko,” a/k/a “Ruslan Novruzzade,” RUHOLLAH BAZGHANDI, a/k/a “Roohollah Azimi,” HAJ TAHER, HOSSEIN SEDIGHI, and SEYED MOHAMMAD FOROUZAN, the defendants, and others known and unknown, would and did knowingly travel in and cause others to travel in interstate and foreign commerce, and would and did use and cause another to use a facility of interstate and foreign commerce, with intent that a murder be committed in violation of the laws of the State of New York or the United States as consideration for the receipt of and as consideration for a promise or agreement to pay anything of pecuniary value, to wit, BAZGHANDI, HAJ TAHER, SEDIGHI, FOROUZAN, AMIROV, OMAROV, and MAMEDOV agreed that Mehdiyev would kill the Victim in exchange for payment, and used cellphones and electronic messaging applications to communicate in furtherance of the scheme.

(Title 18, United States Code, Sections 1958 and 3238.)

**COUNT THREE**  
**(Money Laundering Conspiracy)**

The Grand Jury further charges:

26. The allegations contained in paragraphs 1 through 20 of this Indictment are repeated and realleged as if fully set forth herein.

27. From at least in or about July 2022, up to and including in or about January 2023, in the Southern District of New York and elsewhere, and in an offense begun and committed in Iran, Azerbaijan, Georgia, Slovenia, and elsewhere out of the jurisdiction of any particular State



or district of the United States, RAFAT AMIROV, a/k/a "Farkhaddin Mirzoev," a/k/a "Рим," a/k/a "Rome," POLAD OMAROV, a/k/a "Araz Aliyev," a/k/a "Novruz Novruzzade," a/k/a "Polad Qaqa," a/k/a "Haci Qaqa," and ZIALAT MAMEDOV, a/k/a "Ziko," a/k/a "Ruslan Novruzzade," the defendants, and others known and unknown, at least one of whom was first brought to and arrested in the Southern District of New York, intentionally and knowingly did combine, conspire, confederate, and agree together and with each other to commit money laundering, in violation of Title 18, United States Code, Section 1956.

28. It was further a part and an object of the conspiracy that RAFAT AMIROV, a/k/a "Farkhaddin Mirzoev," a/k/a "Рим," a/k/a "Rome," POLAD OMAROV, a/k/a "Araz Aliyev," a/k/a "Novruz Novruzzade," a/k/a "Polad Qaqa," a/k/a "Haci Qaqa," and ZIALAT MAMEDOV, a/k/a "Ziko," a/k/a "Ruslan Novruzzade," the defendants, and others known and unknown, in an offense involving and affecting interstate and foreign commerce, knowing that the property involved in certain financial transactions represented the proceeds of some form of unlawful activity, would and did conduct and attempt to conduct such financial transactions which in fact involved the proceeds of specified unlawful activity, to wit, the proceeds of the murder-for-hire offenses charged in Counts One and Two of this Indictment, knowing that the transactions were designed in whole and in part to conceal and disguise the nature, location, source, ownership, and control of the proceeds of said specified unlawful activity, in violation of Title 18, United States Code, Section 1956(a)(1)(B)(i).

29. It was further a part and an object of the conspiracy that RAFAT AMIROV, a/k/a "Farkhaddin Mirzoev," a/k/a "Рим," a/k/a "Rome," POLAD OMAROV, a/k/a "Araz Aliyev," a/k/a "Novruz Novruzzade," a/k/a "Polad Qaqa," a/k/a "Haci Qaqa," and ZIALAT MAMEDOV, a/k/a "Ziko," a/k/a "Ruslan Novruzzade," the defendants, and others known and

unknown, would and did transport, transmit, and transfer, and attempt to transport, transmit, and transfer, monetary instruments and funds to a place in the United States from and through a place outside the United States, and to a place outside the United States from and through a place in the United States, in amounts exceeding \$10,000, with the intent to promote the carrying on of specified unlawful activity, to wit, the murder-for-hire offenses charged in Counts One and Two of this Indictment, in violation of Title 18, United States Code, Section 1956(a)(2)(A).

30. It was further a part and an object of the conspiracy that RAFAT AMIROV, a/k/a "Farkhaddin Mirzoev," a/k/a "Рим," a/k/a "Rome," POLAD OMAROV, a/k/a "Araz Aliyev," a/k/a "Novruz Novruzzade," a/k/a "Polad Qaqa," a/k/a "Haci Qaqa," and ZIALAT MAMEDOV, a/k/a "Ziko," a/k/a "Ruslan Novruzzade," the defendants, and others known and unknown, would and did transport, transmit, and transfer, and attempt to transport, transmit, and transfer, a monetary instrument and funds from a place in the United States to and through a place outside the United States and to a place in the United States from and through a place outside the United States, in amounts exceeding \$10,000, knowing that the monetary instrument and funds involved in the transportation, transmission, and transfer represented the proceeds of some form of unlawful activity and knowing that such transportation, transmission, and transfer was designed in whole and in part to conceal and disguise the nature, location, source, ownership, and control of the proceeds of specified unlawful activity, to wit, the murder-for-hire offenses charged in Counts One and Two of this Indictment, in violation of Title 18, United States Code, Section 1956(a)(2)(B)(i).

(Title 18, United States Code, Sections 1956(h), (f).)

**COUNT FOUR**  
**(Attempted Murder in Aid of Racketeering)**

The Grand Jury further charges:

31. The allegations contained in paragraphs 1 through 20 of this Indictment are repeated and realleged as if fully set forth herein.

**The Enterprise**

32. At all times relevant to this Indictment, RAFAT AMIROV, a/k/a "Farkhaddin Mirzoev," a/k/a "Рим," a/k/a "Rome," POLAD OMAROV, a/k/a "Araz Aliyev," a/k/a "Novruz Novruzzade," a/k/a "Polad Qaqa," a/k/a "Haci Qaqa," and ZIALAT MAMEDOV, a/k/a "Ziko," a/k/a "Ruslan Novruzzade," the defendants, and others known and unknown, were affiliated with *Vory v Zakone*, also known as the Thieves-in-Law or "Russian Mob," a criminal group. The defendants and others formed a group (the "Organization") that engaged in, among other things, acts involving murder, assault, extortion, kidnapping, robbery, and arson. The *Vory v Zakone* at times directed and participated in some of the criminal activities of the Organization. The Organization operated in the Southern District of New York and elsewhere.

33. At all times relevant to this Indictment, the Organization, including its leadership, membership, and associates, constituted an "enterprise," as that term is defined in Title 18, United States Code, Section 1959(b)(2), that is, a group of individuals associated in fact that engaged in, and the activities of which affected, interstate and foreign commerce. The enterprise constituted an ongoing organization whose members functioned as a continuing unit for a common purpose of achieving the objectives of the enterprise.

34. At all times relevant to this Indictment, RAFAT AMIROV, a/k/a "Farkhaddin Mirzoev," a/k/a "Рим," a/k/a "Rome," POLAD OMAROV, a/k/a "Araz Aliyev," a/k/a "Novruz Novruzzade," a/k/a "Polad Qaqa," a/k/a "Haci Qaqa," and ZIALAT MAMEDOV,



a/k/a "Ziko," a/k/a "Ruslan Novruzzade," the defendants, were members and associates of the Organization and participated in unlawful and other activity in furtherance of the conduct of the Organization's affairs.

#### Purposes of the Enterprise

35. The purposes of the Organization included, but were not limited to, the following:

a. Enriching the members and associates of the Organization through, among other things, extortion, kidnapping, murder, money laundering, and bank fraud.

b. Preserving, enhancing, promoting, and protecting the power, territory, and financial profits of the Organization through acts involving murder, assaults, robberies, kidnapping, extortion, arson, other acts of violence, intimidation and other threats of physical and economic harm.

#### Means and Methods of the Enterprise

36. Among the means and methods by which members and associates of the Organization conducted and participated in the conduct of the affairs of the Organization included, but were not limited to, the following:

a. Members and associates of the Organization generated money for the Organization, its members, and its associates through various criminal activities including, but not limited to, acts involving murder, assaults, robberies, kidnapping, extortion, arson, money laundering and bank fraud.

b. Members and associates of the Organization enhanced, preserved, promoted and protected the power and financial profits of the Organization through violence, intimidation and threats of physical and economic harm.

c. Members and associates of the Organization engaged in conduct designed to prevent detection of their identities, their illegal activities and the location of proceeds of those activities.

37. At all times relevant to this Indictment, the Organization, through its members and associates, engaged in racketeering activity, as that term is defined in Title 18, United States Code, Sections 1961(1) and 1959(b)(1), namely acts involving murder in violation of New York state law, namely New York Penal Law Sections 125.25 (murder), 20.00 (aiding and abetting), 110.00 (attempt), 105.15 (conspiracy) and acts indictable under Title 18, United States Code, Sections 956 (conspiracy to kill, kidnap, maim, or injure persons or damage property in a foreign country), 1951 (relating to interference with commerce, robbery, or extortion), 1956 (relating to laundering of monetary instruments), 1344 (relating to financial institution fraud), and 956(a)(1) (relating to conspiracy to murder, kidnap, or maim persons abroad).

Attempted Murder in Aid of Racketeering

38. From in or about June 2022 through in or about July 2022, in the Southern District of New York and elsewhere, RAFAT AMIROV, a/k/a "Farkhaddin Mirzoev," a/k/a "Рим," a/k/a "Rome," POLAD OMAROV, a/k/a "Araz Aliyev," a/k/a "Novruz Novruzzade," a/k/a "Polad Qaqa," a/k/a "Haci Qaqa," and ZIALAT MAMEDOV, a/k/a "Ziko," a/k/a "Ruslan Novruzzade," the defendants, and others known and unknown, as consideration for the receipt of, and as consideration for a promise and agreement to pay, a thing of pecuniary value from the Organization, and for the purpose of gaining entrance to and maintaining and increasing position in the Organization, an enterprise engaged in racketeering activity, attempted to murder the Victim,

and aided and abetted the same in violation of New York Penal Law, Sections 125.25(1), 110.00, and 20.00.

(Title 18, United States Code, Sections 1959(a)(5) and 2.)

**COUNT FIVE**

**(Firearm Use, Carrying, and Possession During and in Relation to Attempted Murder)**

The Grand Jury further charges:

39. The allegations contained in paragraphs 1 through 20 of this Indictment are repeated and realleged as if fully set forth herein.

40. From in or about June 2022 up to in or about July 2022, in the Southern District of New York and elsewhere, RAFAT AMIROV, a/k/a “Farkhaddin Mirzoev,” a/k/a “Рим,” a/k/a “Rome,” POLAD OMAROV, a/k/a “Araz Aliyev,” a/k/a “Novruz Novruzzade,” a/k/a “Polad Qaqa,” a/k/a “Haci Qaqa,” and ZIALAT MAMEDOV, a/k/a “Ziko,” a/k/a “Ruslan Novruzzade,” the defendants, during and in relation to a crime of violence for which each may be prosecuted in a court of the United States, namely, the attempted murder in aid of racketeering offense charged in Count Five of this Indictment, knowingly used and carried a firearm, and in furtherance of such crime, possessed a firearm, and aided and abetted the use, carrying, and possession of a firearm.

(Title 18, United States Code, Sections 924(c)(1)(A)(i) and 2.)

**COUNT SIX**

**(Conspiracy to Violate the International Emergency Economic Powers Act)**

The Grand Jury further charges:

41. The allegations contained in paragraphs 1 through 20 of this Indictment are repeated and realleged as if fully set forth herein.



### **The International Emergency Economic Powers Act**

42. The International Emergency Economic Powers Act (“IEEPA”), codified at Title 50, United States Code, Sections 1701 to 1708, confers upon the President authority to deal with unusual and extraordinary threats to the national security and foreign policy of the United States. Section 1705 provides, in part, that “[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 title.” 50 U.S.C. § 1705(a).

43. Beginning with Executive Order No. 12170, issued on November 14, 1979, the President has found that “the situation in Iran constitutes an unusual and extraordinary threat to the national security, foreign policy and economy of the United States” and declared “a national emergency to deal with that threat.”

### **The Iranian Transactions and Sanctions Regulations**

44. On March 15 and May 6, 1995, the President issued Executive Orders Nos. 12957 and 12959, prohibiting, among other things, the exportation, reexportation, sale, or supply, directly or indirectly, to Iran of any goods, technology, or services from the United States or by a United States person, and on August 19, 1997, issued Executive Order No. 13059 clarifying the previous orders (collectively, the “Executive Orders”). The Executive Orders authorized the United States Secretary of the Treasury to promulgate rules and regulations necessary to carry out the Executive Orders. Pursuant to this authority, the Secretary of the Treasury promulgated the Iranian Transactions Regulations (renamed in 2013 the Iranian Transactions and Sanctions Regulations, or “ITSR”), implementing the sanctions imposed by the Executive Orders.

45. Title 31, Code of Federal Regulations, Section 560.204 of the ITSR prohibits, among other things, the exportation, reexportation, sale, or supply, directly or indirectly, from the United States, or by a United States person, of goods, technology, or services to Iran or

the Government of Iran (with certain limited exceptions), including the exportation, reexportation, sale, or supply of goods, technology, or services to a third country knowing that such goods, technology, or services are intended for Iran or the Government of Iran, without a license from OFAC.

46. The ITSR further prohibit transactions that evade or avoid, have the purpose of evading or avoiding, cause a violation of, or attempt to violate the ITSR. *See* 31 C.F.R. § 560.203.

### **The Global Terrorism Sanctions Regime**

47. On September 23, 2001, the President issued Executive Order No. 13224, providing that all property and interests in property in the United States of persons determined to have committed or to pose a significant risk of committing acts of terrorism that threaten U.S. nationals or the national security, foreign policy, or economy of the United States, or determined to act for or on behalf of such persons or to assist in, sponsor, or provide financial, material, or technological support for, or financial or other services to or in support of, such acts of terrorism or such persons (Specially Designated Global Terrorists, “SDGT”) is blocked. Executive Order No. 13224 authorized the United States Secretary of the Treasury to promulgate rules and regulations necessary to carry out the Executive Order. Pursuant to this authority, the Secretary of the Treasury promulgated the Global Terrorism Sanctions Regulations (“GTSR”), implementing the sanctions imposed by the Executive Order.

48. Title 31, Code of Federal Regulations, Section 594.201(a) of the GTSR provides, in relevant part:

[P]roperty and interests in property of [SDGTs] that are in the United States, that hereafter come within the United States, or that hereafter come within the possession or control of U.S. persons, including their overseas branches, are blocked and may not be



transferred, paid, exported, withdrawn or otherwise dealt in . . . .

49. Section 594.205 of the GTSR further prohibits attempts and conspiracies to violate or to evade the prohibitions of the GTSR.

50. As alleged above, *see supra* ¶ 9, IRGC-IO has been designated an SDGT pursuant to Executive Order No. 14078.

51. As alleged above, *see supra* ¶¶ 9, 10, RUHOLLAH BAZGHANDI, a/k/a “Roohollah Azimi,” the defendant, has been designated as a Specially Designated National, pursuant to Executive Order Nos. 13224 and 14078.

#### **Statutory Allegations**

52. From at least in or about July 2022, up to and including in or about January 2023, in the Southern District of New York and elsewhere, and in an offense begun and committed in Iran, Azerbaijan, Georgia, Slovenia, and elsewhere out of the jurisdiction of any particular State or district of the United States, RUHOLLAH BAZGHANDI, a/k/a “Roohollah Azimi,” HAJ TAHER, HOSSEIN SEDIGHI, and SEYED MOHAMMAD FOROUZAN, the defendants, and others known and unknown, at least one of whom is expected to be first brought to and arrested in the Southern District of New York, knowingly and willfully combined, conspired, confederated, and agreed together and with each other to violate, and to cause a violation of, licenses, orders, regulations, and prohibitions issued under the IEEPA.

53. It was a part and an object of the conspiracy that RUHOLLAH BAZGHANDI, a/k/a “Roohollah Azimi,” HAJ TAHER, HOSSEIN SEDIGHI, and SEYED MOHAMMAD FOROUZAN, the defendants, and others known and unknown, would and did provide and cause others to provide services to Iran and to the Government of Iran from the United States and by U.S. persons, without first obtaining the required approval of OFAC, and to evade the requirements of U.S. law with respect to the provision of services to Iran and to the Government



of Iran from the United States and by U.S. persons, in violation of Executive Order Nos. 12959, 13059, and 13224; Part 31 of the Code of Federal Regulations, Sections 560.203, 560.204, and 560.205; and Part 31 of the Code of Federal Regulations, Sections 594.201, 594.204, and 594.205.

(Title 18, United States Code, Section 3238;  
Title 50, United States Code, Section 1705;  
Executive Orders 12959, 13059, & 13224; Title 31, Code of Federal Regulations, Sections  
560.203, 560.204, 560.205, 594.201, 594.204, & 594.205.)

### **FORFEITURE ALLEGATIONS**

54. As a result of committing the murder-for-hire offenses alleged in Counts One and Two of this Indictment, RAFAT AMIROV, a/k/a “Farkhaddin Mirzoev,” a/k/a “Рим,” a/k/a “Rome,” POLAD OMAROV, a/k/a “Araz Aliyev,” a/k/a “Novruz Novruzzade,” a/k/a “Polad Qaqa,” a/k/a “Haci Qaqa,” ZIALAT MAMEDOV, a/k/a “Ziko,” a/k/a “Ruslan Novruzzade,” RUHOLLAH BAZGHANDI, a/k/a “Roohollah Azimi,” HAJ TAHER, HOSSEIN SEDIGHI, and SEYED MOHAMMAD FOROUZAN, the defendants, shall forfeit to the United States, pursuant to Title 18, United States Code, Section 981(a)(1)(C) and Title 28, United States Code, Section 2641, all property, real and personal, which constitutes or is derived from proceeds traceable to said offenses, including but not limited to a sum of money in United States currency representing the amount of proceeds traceable to the commission of said offenses.

55. As a result of committing the money laundering offense alleged in Count Three of this Indictment, RAFAT AMIROV, a/k/a “Farkhaddin Mirzoev,” a/k/a “Рим,” a/k/a “Rome,” POLAD OMAROV, a/k/a “Araz Aliyev,” a/k/a “Novruz Novruzzade,” a/k/a “Polad Qaqa,” a/k/a “Haci Qaqa,” and ZIALAT MAMEDOV, a/k/a “Ziko,” a/k/a “Ruslan Novruzzade,” the defendants, shall forfeit to the United States, pursuant to Title 18, United States Code, Section 982(a)(1), all property, real and personal, involved in the money laundering offense and all property traceable to such property, including but not limited to, a sum of money representing the

amount of property that was involved in the money laundering offense or is traceable to such property.

56. As a result of committing the firearms offenses alleged in Counts Four and Five of this Indictment, RAFAT AMIROV, a/k/a “Farkhaddin Mirzoev,” a/k/a “Рим,” a/k/a “Rome,” POLAD OMAROV, a/k/a “Araz Aliyev,” a/k/a “Novruz Novruzzade,” a/k/a “Polad Qaqa,” a/k/a “Haci Qaqa,” and ZIALAT MAMEDOV, a/k/a “Ziko,” a/k/a “Ruslan Novruzzade,” the defendants, shall forfeit to the United States, pursuant to Title 18, United States Code, Section 924(d) and Title 28, United States Code, Section 2461(c), all firearms and ammunition involved and used in the commission of said offense, including but not limited to the following: (i) a Norinco AK-47-style assault rifle with two ammunition clips; and (ii) approximately 66 rounds of ammunition.

57. As a result of committing the IEEPA offense charged in Count Six of this Indictment, RUHOLLAH BAZGHANDI, a/k/a “Roohollah Azimi,” HAJ TAHER, HOSSEIN SEDIGHI, and SEYED MOHAMMAD FOROUZAN, the defendants, shall forfeit to the United States, pursuant to Title 18, United States Code, Section 981(a)(1)(C) and Title 28, United States Code, Section 2641, all property, real and personal, which constitutes or is derived from proceeds traceable to said offenses, including but not limited to a sum of money in United States currency representing the amount of proceeds traceable to the commission of said offenses.

#### Substitute Assets Provision

58. If any of the above-described forfeitable property, as a result of any act or omission of the defendants:


- a) cannot be located upon the exercise of due diligence;
- b) has been transferred or sold to, or deposited with, a third person;
- c) has been placed beyond the jurisdiction of the Court;

- d) has been substantially diminished in value; or
- e) has been commingled with other property which cannot be subdivided without difficulty;

it is the intent of the United States, pursuant to Title 21, United States Code, Section 853(p) and Title 28, United States Code, Section 2461(c), to seek forfeiture of any other property of the defendants up to the value of the above forfeitable property.

(Title 18, United States Code, Sections 924, 981, and 982;  
Title 21, United States Code, Section 853; and  
Title 28, United States Code, Section 2461.)

  
FOREPERSON

  
DAMIAN WILLIAMS  
United States Attorney