

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF COLUMBIA**

**Holding a Criminal Term  
Grand Jury Sworn in on July 9, 2018**

<b>UNITED STATES OF AMERICA</b>	:	<b>CRIMINAL NO.</b>
	:	
<b>v.</b>	:	<b>Grand Jury Original</b>
	:	
	:	<b>VIOLATIONS:</b>
	:	
<b>MAHMOUD REZA ELYASSI,</b>	:	<b>18 U.S.C. § 371</b>
<b>(a/k/a MAHMOUD REZA ELYASI)</b>	:	<b>(Conspiracy to Defraud United States</b>
	:	<b>and to Violate the International</b>
<b>Defendant.</b>	:	<b>Emergency Economic Powers Act)</b>
	:	
	:	<b>18 U.S.C. § 1956</b>
	:	<b>(Money Laundering Conspiracy)</b>
	:	
	:	<b>FORFEITURE:</b>
	:	<b>18 U.S.C. § 981(a)(1)(C)</b>
	:	<b>18 U.S.C. § 982(a)(1)</b>
	:	<b>21 U.S.C. § 853(p)</b>
	:	<b>28 U.S.C. § 2461(c)</b>
	:	

**INDICTMENT**

The Grand Jury charges that:

**COUNT ONE**

**GENERAL ALLEGATIONS**

At all times material to this Indictment:

1. Defendant MAHMOUD REZA ELYASSI (“ELYASSI”) was an Iranian national who ordinarily resided in Iran. ELYASSI controlled Company C-1 and Company C-2, both of which conducted their business operations in Iran. Company C-1 was a customer of Standard Chartered Bank’s (“SCB” or “the Bank”) branch office in Dubai (“SCB Dubai”) from around

December 2006 through February 2011. Company C-2 was a customer of SCB Dubai from around February 2011 through September 2011. Both Company C-1 and Company C-2 conducted U.S. dollar financial transactions through the United States using their accounts at SCB Dubai.

2. SCB was headquartered in London, United Kingdom, with branch offices around the world including in the United Arab Emirates (“UAE”) and in New York, NY. The Bank’s branch office in New York provided wholesale banking services, including U.S. dollar clearing services for international wire transactions.

3. Person A worked at SCB’s branch office in Dubai (“SCB Dubai”) as a Relationship Manager from 2007 through 2014. As a relationship manager, Person A was the main point of contact between the bank and numerous small and medium enterprise (“SME”) companies that were in his portfolio. Person A interacted with his customers frequently: answering questions, conducting research, and representing the customer’s interests to other SCB components (e.g., the foreign exchange desk).

4. Person B worked at SCB Dubai from approximately 2008 to 2014, as a Treasury Sales Manager (i.e., a foreign exchange sales manager). Person B serviced the needs of the SME customers for SCB Dubai, including encouraging and helping to facilitate foreign exchange transactions. Treasury Sales Managers partnered with Relationship Managers to develop customer relationships.

5. The United States Department of the Treasury, Office of Foreign Assets Control (“OFAC”), which is located in the District of Columbia, among other things, administers and enforces economic and trade sanctions against certain foreign countries, including Iran, and entities associated with those countries.