

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

UNITED STATES OF AMERICA) No. 14 CR 134
)
 v.) Violations: Title 18, United States Code,
) Section 554(a); Title 50, United States Code,
 BILAL AHMED) Sections 1705(a) and (c)

COUNT ONE

The SPECIAL MARCH 2013 GRAND JURY charges:

1. At times material to this indictment:

a. The International Emergency Economic Powers Act (“IEEPA”), Title 50, United States Code, Sections 1701 *et. seq.*, granted the President of the United States the authority to deal with unusual and extraordinary threats to the national security, foreign policy, and economy of the United States.

b. The Export Administration Act of 1979 (“EAA”), Title 50 Appendix, United States Code, Sections 2401-2420, regulated the export of goods, technology, and software from the United States. Pursuant to the EAA, the U.S. Department of Commerce promulgated the Export Administration Regulations, Title 15, Code of Federal Regulations, Parts 730-774, which contained restrictions on the export of goods outside of the United States.

c. Although the EAA lapsed in August 2001, the President, pursuant to IEEPA, issued Executive Order 13222 on or about August 17, 2001, 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 EAA's expiration. Pursuant to IEEPA, the President, and subsequent Presidents, ordered that the Export Administration Regulations' provisions remain in full force and effect despite the expiration of the EAA.

d. In general, the Export Administration Regulations applied to goods, technology, and software that were "dual use" in nature, meaning that they had military and non-military applications. For various national security reasons, the Export Administration Regulations prohibited the export of certain goods and commodities to specific countries, absent permission from the U.S. Department of Commerce issued in the form of an export license. The U.S. Department of Commerce, Bureau of Industry and Security maintained the Commerce Control List, which consisted of general categories of goods that were controlled for export. Individual items within the Commerce Control List were identified by an Export Control Classification Number ("ECCN").

e. The FLIR HRC-U thermal imaging camera was on the Commerce Control List (assigned ECCN 6A003.b.4.a) for reasons of national security and regional stability, and required a license from the U.S. Department of Commerce, Bureau of Industry and Security for export from the United States to certain countries, including Pakistan.

f. Defendant BILAL AHMED was a United States citizen, a resident of Bolingbrook, Illinois, and the owner, president, and registered agent of

Trexim Corporation, which was located in Schaumburg, Illinois.

g. Neither defendant BILAL AHMED nor Trexim Corporation applied for or obtained a license from the U.S. Department of Commerce, Bureau of Industry and Security to export, from the United States to Pakistan, goods listed under ECCN 6A003.b.4.a, including a FLIR HRC-U thermal imaging camera.

2. On or about March 7, 2014, at Elk Grove Village, in the Northern District of Illinois, and elsewhere,

BILAL AHMED,

defendant herein, did knowingly and willfully attempt to export, from the United States to Pakistan, goods, namely, a FLIR HRC-U thermal imaging camera, without first having obtained the required license from the U.S. Department of Commerce, Bureau of Industry and Security;

In violation of Title 50, United States Code, Sections 1705(a) and (c), and Title 15, Code of Federal Regulations, Sections 736.2 and 764.2.

COUNT TWO

The SPECIAL MARCH 2013 GRAND JURY further charges:

1. Paragraph 1 of Count One is incorporated here.
2. On or about March 7, 2014, at Elk Grove Village, in the Northern District of Illinois, and elsewhere,

BILAL AHMED,

defendant herein, did fraudulently attempt to export and send from the United States to Pakistan, goods, namely, a FLIR HRC-U thermal imaging camera, contrary to the laws and regulations of the United States, that is, Title 50, United States Code, Sections 1705(a) and (c), and Title 15, Code of Federal Regulations, Sections 736.2 and 764.2;

In violation of Title 18, United States Code, Section 554(a).

A TRUE BILL:

FOREPERSON

UNITED STATES ATTORNEY