

Presented to the Court by the foreman of the Grand Jury in open Court, in the presence of the Grand Jury and FILED in the U.S. DISTRICT COURT at Seattle, Washington.

January 31 2018  
WILLIAM M. McCOOL, Clerk  
By *[Signature]* Deputy

UNITED STATES DISTRICT COURT FOR THE WESTERN DISTRICT OF WASHINGTON AT SEATTLE

UNITED STATES OF AMERICA,  
Plaintiff,  
v.  
PAUL STUART BRUNT and  
RAWND KHALEEL ALDALAWI,  
Defendant.

NO. **CR18-025 JLR**  
INDICTMENT

The Grand Jury charges that:

**COUNT 1**  
**(Conspiracy to Violate the Arms Export Control Act)**

Beginning at a time unknown, but not later than October 5, 2016, and continuing until on or about November 27, 2017, at Bellevue, within the Western District of Washington, and elsewhere, PAUL STUART BRUNT, RAWND KHALEEL ALDALAWI, and other persons known and unknown, knowingly and intentionally did conspire to willfully export defense articles designated on the United States Munitions List, International Traffic in Arms Regulations, from the United States to Turkey and Iraq, without having obtained from the United States Department of State a license or written approval for the export of these defense articles, in violation of the Arms Export Control Act, Title 22, United States Code, Section 2778(b)(2), and Title 22, Code of

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1 Federal Regulations, Sections 121.1, 123.1, and 127.1(a), and also did conspire to  
2 commit the offense of Smuggling Goods From the United States, in violation of Title 18,  
3 United States Code, Section 554.

4 **A. Background Law**

5 1. The Arms Export Control Act (“AECA”) generally prohibits, without the  
6 appropriate license, the export of defense articles and defense services, which are  
7 designated by the President. *See* 22 U.S.C. § 2778(b)(2). The AECA provides for  
8 criminal penalties for willful violations of the Act. *See* 22 U.S.C. § 2278(c).

9 2. The Department of State, exercising for the President the above authority  
10 under the AECA, has promulgated the International Traffic in Arms Regulations  
11 (“ITAR”), 22 C.F.R. § 120.1 *et seq.* These regulations include the Munitions List, which  
12 consists of categories of defense articles and services that cannot be exported without a  
13 license issued by the Department of State’s Directorate of Defense Trade Controls  
14 (“DDTC”). *See* 22 C.F.R. §§ 121.1, 123.1, 127.1.

15 3. Category I of the Munitions List includes firearms and their components.  
16 As a result, the export of firearms and/or their components generally requires an export  
17 license issued by the DDTC.

18 4. Title 15, Code of Federal Regulations, Section 30.6 provides that a shipper  
19 exporting items must provide the accurate value and description of the items that were  
20 shipped.

21 **B. Manner and Means of the Conspiracy**

22 5. It was part of the conspiracy that PAUL STUART BRUNT, RAWND  
23 KHALEEL ALDALAWI, and other persons known and unknown, purchased a variety of  
24 firearms and vehicles.

25 6. It was part of the conspiracy that PAUL STUART BRUNT, RAWND  
26 KHALEEL ALDALAWI, and other persons known and unknown, plotted to hide the  
27 firearms in the vehicles for the purpose of smuggling the firearms to Kurdish forces in  
28 Iraq.

1 7. It was part of the conspiracy that PAUL STUART BRUNT, RAWND  
2 KHALEEL ALDALAWI, and other persons known and unknown, completed Customs  
3 forms that falsely described the exports as containing only vehicles.

4 8. It was part of the conspiracy that PAUL STUART BRUNT, RAWND  
5 KHALEEL ALDALAWI, and other persons known and unknown, exported the hidden  
6 firearms on multiple occasions, with the intention that they be given to Kurdish forces in  
7 Iraq.

8 **C. Overt Acts in Furtherance of the Conspiracy**

9 9. During and in furtherance of the conspiracy, within the Western District of  
10 Washington and elsewhere, one or more of the conspirators committed one or more of the  
11 following overt acts, among others:

12 a. On April 14, 2017, PAUL BRUNT purchased a Sig Sauer pistol,  
13 model 1911, .45 caliber, at a gun show in Monroe, Washington, for the purpose of later  
14 attempting to export the firearm to Kurdish forces in Iraq without the required export  
15 license.

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

17 **COUNT 2**  
18 **(Arms Export Control Act)**

19 On or about February 23, 2017, at Bellevue, within the Western District of  
20 Washington, and elsewhere, PAUL STUART BRUNT and RAWND KHALEEL  
21 ALDALAWI did willfully export from the United States defense articles designated on  
22 the United States Munitions List, International Traffic in Arms Regulations, namely  
23 firearms, defense articles covered by Category I of the United States Munitions List,  
24 without having obtained from the United States Department of State, a license or written  
25 approval for the export of the defense articles.

26 All in violation of Title 22, United States Code, Section 2778(b)(2) and (c), Title  
27 22, Code of Federal Regulations, Sections 121.1, 123.1, 126.1, and 127.1(a), and Title 18,  
28 United States Code, Section 2.

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**COUNT 3**  
**(Arms Export Control Act)**

On or about September 14, 2017, at Bellevue, within the Western District of Washington, and elsewhere, PAUL STUART BRUNT and RAWND KHALEEL ALDALAWI did willfully export from the United States defense articles designated on the United States Munitions List, International Traffic in Arms Regulations, namely firearms, defense articles covered by Category I of the United States Munitions List, without having obtained from the United States Department of State, a license or written approval for the export of the defense articles.

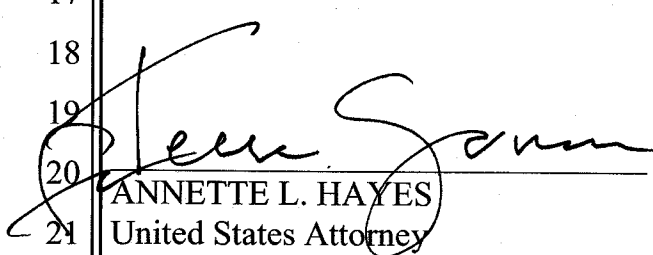
All in violation of Title 22, United States Code, Section 2778(b)(2) and (c), Title 22, Code of Federal Regulations, Sections 121.1, 123.1, 126.1, and 127.1(a), and Title 18, United States Code, Section 2.


A TRUE BILL:

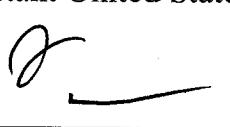
DATED: 1 - 31 - 2018

(Signature of Foreperson redacted pursuant to the policy of the Judicial Conference of the United States)

FOREPERSON

  
ANNETTE L. HAYES  
United States Attorney

  
TODD GREENBERG  
Assistant United States Attorney

  
THOMAS M. WOODS  
Assistant United States Attorney