

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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UNITED STATES OF AMERICA : SUPERSEDING INFORMATION

- v. - : S1 11 Cr. 897 (JFK)

MANSSOR ARBABSIAR, :  
a/k/a "Mansour Arbabsiar," :

Defendant. :

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COUNT ONE

FOREIGN TRAVEL AND USE OF INTERSTATE AND FOREIGN COMMERCE  
FACILITIES IN THE COMMISSION OF MURDER-FOR-HIRE

The United States Attorney charges:

1. From at least in or about the spring of 2011, up to and including September 29, 2011, in the Southern District of New York and elsewhere, MANSSOR ARBABSIAR, a/k/a "Mansour Arbabsiar," the defendant, willfully and knowingly traveled in foreign commerce and used, and caused another to use, a facility of interstate and foreign commerce, to wit, bank wire transfers to an account in the United States from foreign entities, with the intent that a murder be committed in violation of the laws of the United States, to wit, Title 18, United States Code, Section 1116, as consideration for the receipt of, and as consideration for a promise and agreement to pay anything of pecuniary value, as those terms are defined in Title 18, United States Code, Section 1958(b), to wit, ARBABSIAR caused to be

wired approximately \$100,000 into the United States, as partial consideration for the murder of the Ambassador to the United States of Saudi Arabia.

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

COUNT TWO

CONSPIRACY TO ENGAGE IN FOREIGN TRAVEL AND USE INTERSTATE AND FOREIGN COMMERCE FACILITIES IN THE COMMISSION OF MURDER-FOR-HIRE

The United States Attorney further charges:

2. From at least in or about the spring of 2011, up to and including in or about October 2011, in the Southern District of New York and elsewhere, MANSSOR ARBABSIAR, a/k/a "Mansour Arbabsiar," the defendant, and others known and unknown, willfully and knowingly combined, conspired, confederated and agreed together and with each other to violate Title 18, United States Code, Section 1958.

3. It was a part and an object of the conspiracy that MANSSOR ARBABSIAR, a/k/a "Mansour Arbabsiar," the defendant, and others known and unknown, would and did travel in foreign commerce, cause another to travel in foreign commerce, and use the facilities of interstate and foreign commerce, to wit, bank wire transfers to an account in the United States from foreign entities, with the intent that a murder be committed in violation of the laws the United States, to wit, Title 18, United States Code, Section 1116, as consideration for the

receipt of, and as consideration for a promise and agreement to pay anything of pecuniary value, to wit, ARBABSIAR and others known and unknown, agreed that \$100,000 would be wired into the United States as partial consideration for the murder of the Ambassador to the United States of Saudi Arabia.

Overt Acts

4. In furtherance of the conspiracy and to effect the illegal object thereof, MANSSOR ARBABSIAR, a/k/a "Mansour Arbabsiar," the defendant, and others known and unknown, committed the following overt acts, among others, in the Southern District of New York and elsewhere:

a. On or about August 1, 2011, ARBABSIAR caused an overseas wire transfer of approximately \$49,960 to be sent by a foreign entity from a bank located in a foreign country to an undercover bank account (the "UC Bank Account") maintained by the Federal Bureau of Investigation. Before reaching the UC Bank Account, the funds were transferred through a bank in Manhattan, New York.

b. On or about August 9, 2011, ARBABSIAR caused an overseas wire transfer of approximately \$49,960 to be sent by a foreign entity from a bank located in a foreign country to the UC Bank Account. Before reaching the UC Bank Account, the funds were transferred through a bank in Manhattan, New York.

(Title 18, United States Code, Section 1958.)

COUNT THREE

CONSPIRACY TO COMMIT AN ACT OF TERRORISM  
TRANSCENDING NATIONAL BOUNDARIES

The United States Attorney further charges:

5. From at least in or about the spring of 2011, up to and including September 29, 2011, in the Southern District of New York and elsewhere, MANSSOR ARBABSIAR, a/k/a "Mansour Arbabsiar," the defendant, and others known and unknown, willfully and knowingly combined, conspired, confederated and agreed together and with each other to commit an offense against the United States, to wit, to violate Title 18, United States Code, Sections 2332b(a)(1)(A), (a)(1)(B), (b)(1)(A) and (b)(1)(B).

6. It was a part and an object of the conspiracy that MANSSOR ARBABSIAR, a/k/a "Mansour Arbabsiar," the defendant, and others known and unknown, would kill and maim persons within the United States and would create a substantial risk of serious bodily injury to others by destroying and damaging structures, conveyances and other real and personal property within the United States, in violation of the laws of a State and the United States, including Title 18, United States Code, Section 1116, in circumstances in which facilities of interstate and foreign commerce would be used in furtherance of the offense, including bank wire transfers to an account in the

United States from foreign entities, and in which the offense would obstruct, delay and affect interstate and foreign commerce, to wit, ARBABSIAR, during meetings outside the United States, agreed with others to hire persons to kill the Ambassador to the United States of Saudi Arabia, while the Ambassador was in the United States.

Overt Acts

7. In furtherance of the conspiracy and to effect the illegal object thereof, MANSSOR ARBABSIAR, a/k/a "Mansour Arbabsiar," the defendant, and others known and unknown, committed in the Southern District of New York and elsewhere, the acts set forth in Paragraph 4 of this Information, which are fully incorporated by reference herein, among others.

(Title 18, United States Code, Section 371.)

FORFEITURE ALLEGATION

8. As a result of committing one or more of the offenses alleged in Counts One and Two of this Information, MANSSOR ARBABSIAR, a/k/a "Mansour Arbabsiar," the defendant, shall forfeit to the United States, pursuant to 18 U.S.C. § 981(a)(1)(c) and 28 U.S.C. § 2461, all property, real and personal, that constitutes or is derived from proceeds traceable to the commission of the offenses.

Substitute Asset Provision

9. If any of the above-described forfeitable property, as a result of any act or omission of the defendant:
- 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 28 U.S.C. 2461(c) to seek forfeiture of any other property of MANSSOR ARBABSIAR, a/k/a "Mansour Arbabsiar," the defendant, up to the value of the above forfeitable property.

(Title 18, United States Code, Section 981;  
Title 21, United States Code, Section 853  
Title 28, United States Code, Section 2461)

Preet Bharara  
PREET BHARARA  
United States Attorney

Form No. USA-33s-274 (Ed. 9-25-58)

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SOUTHERN DISTRICT OF NEW YORK

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UNITED STATES OF AMERICA

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Defendant.

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INFORMATION

18 U.S.C. §§ 1958,  
371, and 2

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PREET BHARARA  
United States Attorney.