

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF NEW YORK**

UNITED STATES OF AMERICA	:	
	:	
v.	:	CRIMINAL NO. 1:22-CR-33 (EK)
	:	
KAMBIZ ATTAR KASHANI	:	
	:	
Defendant.	:	

**DEFENDANT’S RESPONSE TO THE GOVERNMENT’S LETTER PROVIDING
ADDITIONAL INFORMATION REQUESTED BY THE COURT
AT DEFENDANT’S NOVEMBER 1, 2022 SENTENCING HEARING**

Defendant Kambiz Attar Kashani, by and through undersigned counsel, respectfully submits this Response to aid the Court in sentencing, which is currently scheduled for December 12, 2022. This submission supplements Defendant’s Memorandum in Support of Sentencing dated October 7, 2022, and is in response to the Government’s November 15, 2022 letter to the Court providing additional information as directed by the Court during Defendant’s November 1, 2022, sentencing hearing.

Specifically, this Response addresses the following: (1) whether UAE Company 1 had a legitimate business purpose as a certified SWIFT service bureau, and the Defendant’s role and responsibilities in connection with the provision of SWIFT services; (2) the U.S. export classification and use of the U.S.-origin goods and software exported to Iran as part of the charged conspiracy; and (3) potential forfeiture of the Defendant’s share ownerships in UAE Company 1 and UAE Company 2.

1. UAE Company 1 had a Legitimate Business Purpose as a Certified SWIFT Bureau

A. UAE Company 1 was a SWIFT Bureau During the Period of the Charged Conspiracy

As provided in the Stipulated Facts agreed to by the Defendant and the Government, UAE Company 1 was established in the UAE in or around 2011 with the specific purpose of providing SWIFT services to Iranian banks. As such, during the period of the charged conspiracy, UAE Company 1 was a certified SWIFT service bureau and provided SWIFT services to a number of Iranian and Iraqi banks pursuant to written agreements with them. In fact, the principal purpose and operations of UAE Company 1 were as a SWIFT bureau.

Until 2018, UAE Company 1 had agreements with and provided SWIFT services to 24 Iranian banks and two Iraqi banks that were on the SWIFT network. In late 2018, the Trump administration withdrew from the JCPOA (the nuclear agreement among Iran, U.S., and other world powers) and began significantly increasing U.S. sanctions on Iran. As a result, 12 of the 24 Iranian banks were removed from the SWIFT network and stopped receiving SWIFT services from UAE Company 1. However, the other 12 banks have remained on the SWIFT network and continue to receive SWIFT services from UAE Company 1.¹

The Iranian banking system has not been totally cut off from the international banking system, and several Iranian banks continue to engage in international transactions through the SWIFT system. While U.S. financial institutions and banks from several other countries may be prohibited under sanctions laws from maintaining correspondent account relations with Iranian banks, many other banks worldwide continue to transact with Iranian banks through the SWIFT network. In fact, the U.S. Treasury Department's Office of Foreign Assets Control (OFAC) has issued General Licenses L and 8A specifically authorizing certain transactions such as those

¹ Some of the removed banks still have SWIFT Business Identifier Codes, but their codes are inactive, and they no longer receive SWIFT services.

relating to the humanitarian exports of food, medicine, and medical devices to Iran, even if U.S.-origin, with sanctioned Iranian financial institutions, including the Central Bank of Iran.²

B. Duties and Responsibilities of Defendant as Technical Manager of UAE Company 1

The functioning of any SWIFT service bureau, including UAE Company 1, depends on the existence and operation of a technical infrastructure comprised of networks of various data centers, servers, and related equipment such as routers, switches, and firewalls to facilitate efficient, cost-effective, and secure transmission of information among financial institutions. UAE Company 1's principal business purpose was to build and operate this physical infrastructure, which was located in the UAE and Turkey, and to provide SWIFT services using the same.

As UAE Company 1's technical manager, the Defendant was responsible for building, operating, servicing, maintaining, and upgrading this infrastructure, as well as all technical issues relating to the same. The Defendant was responsible for working with SWIFT in connection with its annual audit and certification of UAE Company 1. Additionally, he was SWIFT's contact person at UAE Company 1, communicating as necessary by phone, through its online portal, and by email. Finally, the Defendant was the contact person for telecommunications companies that provided services to UAE Company 1 in connection with its activities relating to the provision of SWIFT services. Nearly all of the Defendant's work as an employee of UAE Company 1 concerned the foregoing duties and responsibilities, and related administrative tasks.

C. UAE Company 1's Primary Purpose was not to Circumvent U.S. Sanctions

SWIFT is a preeminent international organization based in Brussels with significant U.S. involvement. As such, it would not and does not engage in any activities in violation of U.S.,

² See https://home.treasury.gov/system/files/126/iran_gl8a.pdf and https://home.treasury.gov/system/files/126/iran_gll.pdf.

EU, or other international sanctions. SWIFT bureaus, including UAE Company 1, are subject to rigorous annual inspections by and certifications to SWIFT to ensure compliance with U.S. and international sanctions, among other requirements. As such, it would be rather perplexing if the organization were to certify UAE Company 1 as a SWIFT bureau for many consecutive years even though the business it conducted as a SWIFT bureau constituted only a minor part of its business which, according to the Government, was “primarily, if not solely, to illegally transship goods and technology from U.S. companies to end users in Iran.”

To the contrary, by providing SWIFT services to Iranian banks in accordance with SWIFT requirements in compliance with various international sanctions, including U.S. sanctions, UAE Company 1 and the Defendant were furthering the purpose of transparency in international financial transactions by Iranian banks and compliance thereof with U.S. and other sanctions.

It is asserted in the Government’s November 15, 2022, Submission that SWIFT cannot be operated out of Iran and that there are no SWIFT bureaus operating out of Iran. We respectfully point out this is exactly the reason why UAE Company 1 was established as a UAE entity and its physical operational infrastructure was located outside of Iran.

D. UAE Company 1 Continues to Operate as a SWIFT Bureau

The Defendant understands that UAE Company 1 remains in operation as a SWIFT service bureau and has provided SWIFT services to certain Iranian banks since the Defendant was arrested in January 2022. While the company’s operations appear to have been significantly disrupted as a result of the Defendant’s arrest and the apparent subsequent departure of its other employee in Dubai, UAE Company 1 has another 10-12 employees who do not physically work in the UAE office, as provided in the Stipulated Facts. According to the Government’s November 15, 2022, Submission, UAE Company 1’s old email domain has been replaced with a

new one that is currently active. The apparent expiration of the company's commercial license in Dubai on August 11, 2022, may have been caused by the disruption resulting from the Defendant's arrest but could be renewed, as was the case with its email domain. Finally, although UAE Company 1's website appears to have been disabled, a website is not required for functioning as a SWIFT bureau or providing SWIFT services.

Were it true that UAE Company 1 has not been in operation as a SWIFT Bureau since the Defendant's arrest, which we do not believe to be the case, that would in fact be confirmation of his personal role in running UAE Company 1 as a SWIFT bureau.

The Defendant does not know the current status of UAE Company 2.

2. U.S.-Origin Goods and Software Exported to Iran

In evaluating the nature and circumstances of the Defendant's offense conduct, the types of U.S.-origin products and technology exported to Iran and whether they are inherently sensitive or have military or dual use applications, as well as the volume of commerce involved, are important factors.

The U.S.-origin software, goods and technology allegedly exported to Iran were not particularly extensive in terms of the number or value of products. Moreover, they do not have specific military or dual-use applications, do not have specific utility or application in Iran's nuclear program, and are not otherwise inherently sensitive. Instead, according to the Government's November 15, 2022 Submission, these products appear to have been used to enable Iran Company 1 and its Iranian bank customers, including the Central Bank of Iran, to conduct their banking operations more efficiently, effectively, and securely.

A. Software Purchased from U.S. Company 1

The Defendant was involved in obtaining a subscription for an enterprise development program from U.S. Company 1 which was renewed for five years. The Defendant was also involved in renewing a second subscription for the same program for an additional year. As the Government appears to indicate in its November 15, 2022 Submission, this product is used for developing online and/or mobile banking applications.

Contrary to the Government's assertion in its November 15, 2022 Submission, this product's U.S. Export Control Classification Number (ECCN) is not 5A002.a, which is a hardware classification, but either 5D002 or 5D992.³ As a general indication that it is not viewed by the U.S. Government as a particularly sensitive product, if the program is classified as 5D992 and, depending on the end-use and end-user in Iran, it may, pursuant to OFAC General License D-2 (*General License with Respect to Certain Services, Software, and Hardware Incident to Communications*),⁴ be eligible for export to Iran without specific authorization from OFAC.

B. Open Source Software Purchased from U.S. Company 3

The Linux software in question is open source and as such it is not subject to U.S. export controls, except the proprietary version is likely classified as 5D992. As was the case with the Apple program discussed above, depending on the end-use and end-user in Iran, this software may be eligible for authorized exports to Iran pursuant to General License D-2.

³ [REDACTED] export classification website ([REDACTED]) shows all of its products as either EAR99, 5A992 or 5D992, but we do not have enough information about the program in question to determine its specific classification.

⁴ See https://home.treasury.gov/system/files/126/iran_gld2.pdf. Although issued on September 23, 2022, the predecessor authorization (General License D-1) was issued in 2014 and has been in effect for many years.

C. Attenuators Purchased from U.S. Company 2

According to the Government, the following [REDACTED] fixed attenuators were purchased and exported to Iran as part of the offense conduct:

- VAT-1+ Fixed SS Attenuator/SMA/RoHS
- VAT-2+ Fixed SS Attenuator/SMA/RoHS
- VAT-3+ Fixed SS Attenuator/SMA/RoHS
- VAT-5+ Fixed SS Attenuator/SMA/RoHS
- VAT-6+ Fixed SS Attenuator/SMA/RoHS
- VAT-8+ Fixed SS Attenuator/SMA/RoHS
- VAT-10+ Fixed SS Attenuator/SMA/RoHS
- VAT-15+ Fixed SS Attenuator/SMA/RoHS
- VAT-20+ Fixed SS Attenuator/SMA/RoHS
- ZFBT-282-1.5A+ BIAS TEE/SMA RoHS

The ECCN for all of these products is EAR99, which is the least restrictive classification under U.S. export control laws.

D. Power Supplies and Storage Systems Purchased from U.S. Company 4

According to the Government, the following [REDACTED] power supplies and storage systems were purchased and exported to Iran as part of the offense conduct:

- [REDACTED] with 2" [REDACTED] storage bay
- [REDACTED] with 1" [REDACTED] storage bay
- [REDACTED] - power supply

The [REDACTED] and [REDACTED] are remote storage solutions, which we believe are likely classified as ECCN 5A002, as indicated by the Government. However, the power supplies, as standalone items, would be classified as EAR99.

The Defendant was not personally and directly involved in the purchase or export to Iran of goods or software from U.S. Company 2, U.S. Company 3, or U.S. Company 4, and there is no indication to the contrary in the Complaint or any other submissions by the Government to the Court.

3. Forfeiture of Defendant's Share Ownerships in UAE Company 1 and UAE Company 2

The Defendant stands ready to forfeit all right, title, and interest he has in UAE Company 1 and UAE Company 2. As the Government is likely aware, however, such right, title and interest are worthless. The Defendant holds 20% of the shares of UAE Company 1 and 100% of the shares of UAE Company 2. He holds those shares, however, at the direction and on behalf of Iran Company 1.

Pursuant to a written irrevocable Power of Attorney, dated October 17, 2019, for the benefit of Iran Company 1, the Defendant expressly granted control over the shares in UAE Company 1 and UAE Company 2 to Iran Company 1. More specifically, the Power of Attorney: (i) authorizes Iran Company 1 to transfer all of the Defendant's shares in UAE Company 1 and UAE Company 2 to itself or any other natural or legal person of its choosing; (ii) grants Iran Company 1 full authority with respect to such shares; and (iii) authorizes Iran Company 1 to seize and liquidate the Defendant's assets inside or outside Iran in order to pay for any damages that Iran Company 1 may suffer as a result of his breach of the Power of Attorney.

In a related written Certificate of the same date, the Defendant acknowledges and agrees that (i) he is a shareholder of UAE Company 1 and UAE Company 2, (ii) all of the funds used for purchase of these shares and investment in the UAE Companies belong to Iran Company 1, (iii) he is acting on behalf of Iran Company 1 as a shareholder or officer of the UAE Companies, and (iv) all benefits, losses and profits that may accrue to him as a shareholder in the UAE Companies belong to Iran Company 1. The Defendant also agrees: (i) to transfer any documents and funds relating to his share ownership in the UAE Companies to Iran Company 1 or its designee upon Iran Company 1's request; (ii) that he will not be entitled to any payments for the

transfer of such shares; and (iii) not to transfer his shares in the UAE Companies to any natural or legal person other than as designated by Iran Company 1.

In or about 2012, the Defendant issued a similar Power of Attorney and Certificate for the benefit of the individual who owned the remaining 80% of the shares of UAE Company 1. Based on local legal and regulatory requirements, this Power of Attorney was registered at or about the time of its issuance in a Dubai court.

Copies of these powers of attorney and certificates were previously shared with the Government and are attached hereto as Exhibit 1, together with translations thereof.

4. Conclusion

Based on the foregoing, we continue to believe and respectfully submit that, as previously indicated in the Defendant's Sentencing Memorandum, a sentence of thirteen (13) months of incarceration, two years of supervised release, and a \$50,000 fine is sufficient, but not greater than necessary, to comply with the statutory provisions of 18 U.S.C. § 1705, as well as the statutory directives set forth in 18 U.S.C. § 3553(a).

Dated: November 22, 2022

Respectfully submitted,

By: /s/Babak Hoghooghi
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Facsimile: (202) 293-9035
wcoffield@bcr-dc.com

Attorneys for Defendant Kambiz Attar Kashani

CERTIFICATE OF SERVICE

I hereby certify that on the 22nd day of November 2022, I electronically filed the foregoing Defendant's Response supplementing its Memorandum in Support of Sentencing with the Clerk of Court using the CM/ECF System, causing it to be served upon all counsel of record.

/s/

Babak Hoghooghi-Esfanhani
Counsel for Defendant Kashani

EXHIBIT 1

*Copies of Power of Attorney, Certificates, and
Corresponding Translations into English*

Public Office No. 266 of Tehran
Deed ID: 139832151213000842

Certification code: 862065

By verifying the identity of the signatory/signatories under the document, all the levels mentioned in this document are with me

[logo]

This document has been registered in the electronic book of Notary Public Office No.266 of Tehran, under No.295524 dated 10/12/2019.

Official Document

The Judiciary

State Organization for Registration of Deeds and Properties

Registry Office 266, Tehran
- Seyed Abbas Tabatabayi
[office signature and seal]

Type of the Official Deed: Power of Attorney Notary

damad, West side, Madar Square, T foghali, Mellat bank,87N- Phone number: 22252638

The client			
1	Mr Kambiz Attarkashani		
National No. [REDACTED]	Name: Kambiz	Surname: Attarkashani	Father's name: Yadollah
Date of birth: [REDACTED]	Birth certificate No.: [REDACTED]	Place of issue: United States of America - Foreign Affairs	Tel No.: --
Address: [REDACTED]			Postal code: [REDACTED]
Attorney			
1	Informatics services company		
National No: 1010145520	Name: Name of the legal entity: Informatics services company, Limited liability company	Type of legal entity: Private	Date of Issue: 12.15.1993
Issue No.: 101605	Place of issue: Registration Office of Non-Commercial Companies and Institutions		Tel No.: --
Address: Tehran, Mirdamad, Madar square, Shah Nazari street, Nezam street, Khajavi intersection, Number 6			Postal code: 1111111111
Other Information			

Public Office No. 266 of Tehran
Deed ID: 139832151213000842

Certification code: 862065

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damad, West side, Madar Square, T foghali, Mellat bank,87N- Phone number: 22252638

Right of depositing the attorney: In addition to the necessary foreign contract, the client has deprived himself of the right to dismiss the lawyer.	Right of assigning power of attorney to others : Yes
Conditions & Legal Texts	
<p>Subject of the Power of Attorney: transfer of all the client's shares relating to his ownership in the companies Advance Banking Solution(Trading DMCC(ABS under the registration number: 1708JLT dated 06/08/2011 (June 8, 2011) and All Innovations DMCC under the registration number 169311DMCC dated (May 22, 2019) in Dubai at once and consecutively to himself or any natural or legal person in consideration for any price and any condition and any quantity and quality even if as a contribution at any price and with the right to refer to notary offices and sign related Papers and documents and related offices and the preparation and signing of official documents in all administrative, judicial and registries such as the company registration office, finance, courts of justice and also any responsible institution in the UAE against the claimant and signing the share books and obtaining the resulting shares From increasing the capital and obtaining the related profits including past, present, future and pre-emptive rights if it is assigned to the mentioned shares for attorney and any other natural or legal person and obtaining documents and deeds including originals and copies and taking all the steps and the financial and administrative formalities related to the subject of the power of attorney in such a way that there is no need for the presence and re-signing of the client and obtaining permission from him, the attorney has full authority regarding the shares of the above companies and is authorized to engage in any action that the shareholder may with respect to his shares, if the lawyer suffers losses as a result of the client not complying with the above, the lawyer has the full authority according to this power of attorney to take any movable and immovable property (except for all motor vehicles) belonging to the client. inside or outside of Iran, identify it, own it and transfer it officially and definitively to his name or to any person he deems appropriate and compensate his loss from the proceeds. In addition, the client deprived himself of the right to revoke this power of attorney.</p>	
Legal Expenses	
Registration fee at Rls.20,000-- Deposited via: Electronic payment/PcPos -Bill reference No.:51213629811144 - reference No.:17373549807 Date: 10.05.2019 - 11:21 - Amount: 724,000 - Card No:6104***0529	
Official deed electronic issuance expense at Rls.50,000 - Deposited via: Electronic payment/PcPos -Bill reference No.:51213629811144 - reference No.:17373549807 Date: 10.05.2019 - 11:21 - Amount: 724,000 - Card No:6104***0529	
Writing fee at Rls.500,000 -Deposited via: Electronic payment/PcPos -Bill reference No.:51213629811144 - reference No.:17373549807 Date: 10.05.2019 - 11:21 - Amount: 724,000 - Card No:6104***0529	
Additional papers fee at Rls.500,000 -Deposited via: Electronic payment/PcPos -Bill reference No.:51213629811144 - reference No.:17373549807 Date: 10.05.2019 - 11:21 - Amount: 724,000 - Card No:6104***0529	
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Total: Rls.724,000	

Kambiz Attarkashani [Fingerprint]

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-Any forgery in official documents will be subject to articles 522 and 523 of the Islamic Penal Code.

Public Office No. 266 of Tehran
Deed ID: 139832151213000842

Certification code: 862065

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The Judiciary

State Organization for Registration of Deeds and Properties

Registry Office 266, Tehran
- Seyed Abbas Tabatabayi
[office signature and seal]

Type of the Official Deed: Power of Attorney Notary

damad, West side, Madar Square, T foghali, Mellat bank,87N- Phone number: 22252638

headquarters			
1] Mr.Kambiz Attarkashani			
National No.:	Name:Kambiz	Surname:Attarkashani	Father's name:Yadollah
Date of birth:	Birth certificate No. [REDACTED]	Place of issue: United States of America -	Tel No.: -
Address: [REDACTED]			Postal code: [REDACTED]
Description: Passport number [REDACTED]			
Admitted specifications			
Admitted: affidavit			
Conditions & Legal Texts			
<p>Hereby, I (the above declarant) residing at the above address and the shareholder of the company Advance Banking Solution(Trading DMCC(ABS in Dubai under the registration number:LT1708 dated: 08.06.2011 (June 8, 2011) and the company All Innovations DMCC under the registration numberDMCC169311 in Dubai acknowledge and declare that all the funds related to the purchase of my shares and investment in the mentioned company belong to the Informatic Services Company with the national ID number 10101455520, the place of registration of Iran-Tehran (which will be called the client from now on), and in fact, I am the trustee and attorney of the Informatic Services Company in the mentioned companies, and according to the laws and regulations and according to the client's wishes and interests, I will perform duties as a shareholder, manager or in other capacities, in the above companies, and any and all salary, compensation, profits or losses accrued to me as a shareholder of these companies belongs to the client. In addition, I am committed upon client's request to transfer any shares, documents, deeds and funds in my possession to the client or any other person he designates, and in any case, I will not be paid any money for the transfer of shares. At the same time, I undertake not to transfer the said shares to any natural or legal person other than the person introduced by the client.</p>			
Legal Expenses			
Registration fee at Rls.20,000-- Deposited via: Electronic payment/PcPos -Bill reference No.:51213619811144 - reference No.:17373526600 Date: 10.05.2019 - 11:21 - Amount: 615,000 - Card No:6104***0529			
Official deed electronic issuance expense at Rls.50,000 - Deposited via: Electronic payment/PcPos -Bill reference No.:51213619811144 - reference No.:17373526600 Date: 10.05.2019 - 11:21 - Amount: 615,000 - Card No:6104***0529			
Writing fee at Rls.500,000 -Deposited via: Electronic payment/PcPos -Bill reference No.:51213619811144 - reference No.:17373526600 Date: 10.05.2019 - 11:21 - Amount: 615,000 - Card No:6104***0529			
VAT at Rls.45,000-Deposited via: Electronic payment/PcPos -Bill reference No.:51213619811144 - reference No.:17373526600 Date: 10.05.2019 - 11:21 - Amount: 615,000 - Card No:6104***0529			
Total: Rls. 615,00			

Kambiz Attarkashani [Fingerprint]

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-Any forgery in official documents will be subject to articles 522 and 523 of the Islamic Penal Code.



CERTIFICATION

TransPerfect is globally certified under the standards ISO 9001:2015, ISO 17100:2015, and ISO 18587:2017. This Translation Certificate confirms the included documents have been completed in conformance with the Quality Management System documented in its ISO process maps and are, to the best knowledge and belief of all TransPerfect employees engaged on the project, full and accurate translations of the source material.

File Name(s): Document 2

Source Language(s): Farsi

Target Language(s): English

Authorized Signature:

Hossam El Shamy

Hossam El Shamy (Oct 5, 2022 10:25 GMT+4)

Name: Hossam El Shamy

Title: Project Manager

Date: 05/10/2022

Reason for signature: I approve the accuracy of this document content as written

این سند در دفتر الکترونیک دفترخانه اسناد رسمی ۲۶۶ تهران تحت شماره ۲۰۵۵۲۲ مورخ ۱۳۹۸/۰۷/۱۳ ثبت شده است



شماره سند: ۱۳۹۸/۰۷/۱۳-۱۱:۲۱
تاریخ ثبت: ۱۳۹۸/۰۷/۱۳



سند رسمی
سند اقرارنامه غیرمالی

سر دفتر ۲۶۶ تهران - سند سند شایستگی
محل امضا و مهر دفترخانه
[Handwritten signature]

دفترخانه اسناد رسمی ۲۶۶ تهران
محل صدور سند رسمی در دفترخانه اسناد رسمی تهران
شماره: ۲۰۵۵۲۲ مورخ: ۱۳۹۸/۰۷/۱۳

آقای کامبیز عطاری کاشانی

نام پدر: پداله	نام خانوادگی: عطاری کاشانی	نام: [Redacted]	کلمه: [Redacted]
شماره تلفن: -	محل صدور شناسنامه: ایالات متحده آمریکا - امور خارجه	[Redacted]	[Redacted]
توضیحات: شماره پاسپورت B۹۶۱۲۸۱۵۱			

مشخصات مورد اقرار

مورد اقرار اقرارنامه

شرایط و متون حقوقی

بدینوسیله اینجانب (اقرار کننده فوق) ساکن نشانی فوق سهامدار شرکت (Advance Banking Solution Trading DMCC (ABS) در دومی به شماره ثبت: ۱۷۰۸ JLT مورخ ۲۰۱۱/۰۶/۰۸ (هشتم زون ۲۰۱۱) و شرکت All Innovations DMCC به شماره ثبت ۱۶۹۳۱۱ DMCC در دومی اعلام و اقرار می نماید که کلیه وجوه مربوط به خرید سهام اینجانب و سرمایه گذاری در شرکت مذکور متعلق به شرکت خدمات انفورماتیک به شناسه ملی ۱۰۱۰۱۴۵۵۲۰ محل ثبت ایران - تهران (که از این پس موکل خوانده میشود) میباشد و در واقع اینجانب امین و وکیل شرکت خدمات انفورماتیک در شرکت های یاد شده هستم و طبق قوانین و مقررات و مطلق حفره و صلاح موکل در شرکت های فوق به عنوان سهامدار، مدیر و یا سایر سمتها/عندالمورد انجام وظیفه مینمایم و کلیه حقوق و عواید و سود و زبانی که متوجه اینجانب به عنوان سهامدار شرکت مزبور میشود به موکل تعلق دارد. ضمناً اینجانب متعهد هستم که در صورت درخواست موکل هر گونه سهام اسناد و مدارک و وجوهی که نزد اینجانب میباشد را به موکل یا هر شخص دیگری که معین نماید انتقال دهم و به هر حال هیچ وجهی بابت انتقال سهام به اینجانب تعلق نخواهد گرفت. ضمناً تمهید می نمایم که سهام مذکور را به هیچ شخص حقیقی یا حقوقی غیر از شخصی که موکل معرفی مینماید منتقل ننمایم.

هزینه های قانونی

حق ثبت به مبلغ: ۳۰۰۰۰۰ ریال - شیوه پرداخت: پرداخت الکترونیک/PCPOS - شماره قسط: ۵۱۲۱۳۶۱۹۸۱۱۱۲۲ - شماره مرجع تراکنش: ۱۷۳۷۲۵۲۶۶۰۰ - تاریخ پرداخت: ۱۳۹۸/۰۷/۱۳-۱۱:۲۱ - مبلغ: ۶۱۵۰۰۰۰ - شماره کارت: ۶۱۰۴۰۰۰۰۵۲۹
حرفه صدور الکترونیک سند رسمی به مبلغ: ۵۰۰۰۰۰ ریال - شیوه پرداخت: پرداخت الکترونیک/PCPOS - شماره قسط: ۵۱۲۱۳۶۱۹۸۱۱۱۲۲ - شماره مرجع تراکنش: ۱۷۳۷۲۵۲۶۶۰۰ - تاریخ پرداخت: ۱۳۹۸/۰۷/۱۳-۱۱:۲۱ - مبلغ: ۶۱۵۰۰۰۰ - شماره کارت: ۶۱۰۴۰۰۰۰۵۲۹
حق التحریر به مبلغ: ۵۰۰۰۰۰ ریال - شیوه پرداخت: پرداخت الکترونیک/PCPOS - شماره قسط: ۵۱۲۱۳۶۱۹۸۱۱۱۲۲ - شماره مرجع تراکنش: ۱۷۳۷۲۵۲۶۶۰۰ - تاریخ پرداخت: ۱۳۹۸/۰۷/۱۳-۱۱:۲۱ - مبلغ: ۶۱۵۰۰۰۰ - شماره کارت: ۶۱۰۴۰۰۰۰۵۲۹
مالیات بر ارزش افزوده به مبلغ: ۴۵۰۰۰۰ ریال - شیوه پرداخت: پرداخت الکترونیک/PCPOS - شماره قسط: ۵۱۲۱۳۶۱۹۸۱۱۱۲۲ - شماره مرجع تراکنش: ۱۷۳۷۲۵۲۶۶۰۰ - تاریخ پرداخت: ۱۳۹۸/۰۷/۱۳-۱۱:۲۱ - مبلغ: ۶۱۵۰۰۰۰ - شماره کارت: ۶۱۰۴۰۰۰۰۵۲۹
جمع کل: ۶۱۵۰۰۰۰ ریال

نام و نام خانوادگی: [Redacted]

* شماره سند و اطلاعات امین این برگه پس از امضای الکترونیک توسط هر دو طرف درگاه سازمان ثبت اسناد و املاک کشور به نشانی www.ssaa.ir قابل تصدیق است * هر گونه حقین بر اسناد رسمی مسئول مواد ۳۲۱ و ۵۲۲ قانون مجازات اسلامی می باشد.

ردم تصدیق: ۸۲۲۰۴۵

این سند در دفتر الکترونیک دفترخانه اسناد رسمی ۲۶۶ تهران تحت شماره ۲۰۵۲۲ مورخ ۱۳۹۸/۰۷/۱۳ ثبت شده است



شناسه سند: ۱۳۹۸۳۳۱۵۱۳۱۳۰۰۰۸۲۲

با اجراء هیئت امضاء، گشوده، امضاء، گشوده، دلیل سند تمام مراتب مستطور در این سند برده و احجاب واقع شد



سند رسمی

سند وکالت نامه

دفترت اسناد رسمی ۲۶۶ تهران

شماره دفتر ثبت: تهران، میرداماد میدان مادر، خیابان نظامی، پلاک ۸۴ - تلفن: ۲۲۲۲۲۲۲۸

موکل

سردفتر ۲۶۶ تهران - سند عباس طاهستانی
محل اسناد و دفترخانه شماره ۲۶۶ تهران
[Handwritten signature and stamp]

نام پدر: پداله	نام خانوادگی: عطارکاشانی	نام کد	[Redacted]
شماره تلفن: —	محل صدور شناسنامه: ایالات متحده آمریکا - امور خارجه	[Redacted]	[Redacted]

توضیحات: شماره پاسپورت B۹۶۱۲۸۹۵۱

وکیل		شرکت خدمات انقورماتیک	۱
نام شخص حقوقی: شرکت خدمات انقورماتیک - شرکت با مسئولیت محدود	نوع شخص حقوقی: خصوصی	شناسه ملی: ۱۰۱۰۴۵۵۵۲۰	
شماره ثبت: ۱۰۱۶۰۵	محل ثبت: اداره ثبت شرکتها و موسسات غیر تجاری	تاریخ ثبت: ۱۳۷۲/۰۹/۲۴	
کد پستی: ۱۱۱۱۱۱۱۱۱	نشانی: تهران میرداماد میدان مادر خیابان شاه نثری خیابان نظامی تقاطع خواجهی شماره ۶		

مشخصات مورد وکالت	مورد وکالت وکالتنامه
سایر اطلاعات	حق عزل وکیل: موکل ضمن عقد خارج لازم، حق عزل وکیل را از خود سلب و ساقط نموده است. حق توکیل به غیر: دارد

مورد وکالت: اقدام به انتقال کلیه سهام موکل ناشی از سهم شرکت های Advance Banking Solution (Trading DMCC (ABS به شماره ثبت: ۱۷۰۸ LT مورخ ۲۰۱۱/۰۶/۰۸ (هشتم ژوئن ۲۰۱۱) و All Innovations DMCC به شماره ثبت ۱۶۹۳۱۱ DMCC مورخ (بیست و دوم می ۲۰۱۹) در دومی بصورت یکجا و متوالیاً به خود یا هر شخص حقیقی یا حقوقی در مقابل هر بهاء و هر شرط و هر کمیت و کیفیت ولو به صورت صلح به هر قیمت و با حق مراجعه به دفتر اسناد رسمی و امضاء ذیل اوراق و اسناد و دفاتر مربوط و تنظیم و امضاء اسناد رسمی مربوط در کلیه مراجع اداری، قضائی و اقتصادی از قبیل اداره ثبت شرکتها، دارائی، محاکم دادگستری و همچنین هر نهاد مسئول در کشور امارات در مقابل مدعی علیه و امضاء دفاتر سهام و اخذ سهام ناشی از افزایش سرمایه و اخذ سودهای متعلقه اعم از گذشته، حال، آینده و حق تقدم چنانچه به برگ سهام مذکور تعلق گیرد برای خود و هر شخص حقیقی و یا حقوقی دیگر و اخذ مدارک و اسناد اعم از اصل و رونوشت و کپی و انجام کلیه مراحل و تشریفات مالی و اداری مربوط به مورد وکالت به گونه ای که نیاز به حضور و امضاء مجدد موکل و کسب اجازه از وی نباشد وکیل دارای اختیارات نام در خصوص سهام شرکت های فوق بوده و مجاز به انجام هر اقدامی است که سهامدار در

• شناسه سند و اطلاعات امین این برگه، پس از امضای الکترونیک توسط سردفتر از طریق درگاه سازمان اسناد و املاک کشور به نشانی www.w5533.ir قابل تصدیق است
• هرگونه جعل در اسناد رسمی مسئول مواد ۵۲۱ و ۵۲۲ قانون مجازات اسلامی خواهد بود

رهر تصدیق ۸۴۲-۴۵

این سند در دفتر الکترونیک دفتر خانه اسناد رسمی ۲۶۶ تهران تحت شماره ۲۰۵۲۴ مورخ ۱۳۹۸/۷/۱۳ ثبت شده است



سند رسمی

سند وکالت نامه
محل خانه اسناد رسمی ۲۶۶ تهران

شماره دفتر: تهران - سروان/منطقه بری و مادر با فناوری ثبت ب ۸۷ - نقش: ۴۴۵۲۴۴۸

شماره سند ۱۳۹۸۳۲۱۵۱۲۱۳۰۰۰۸۴۲

با اقرار عیبت امینا، گنده لامناه گنده گان دین سه نام مراتب مستقر در این سند برد ایجاب واقع شد

سر دفتر ۲۶۶ تهران - سند مجلس طابقتی

محل اسناد و دفتر خانه

سید علی محمد طبیبی

۵۵

خصوص سهام خود دارا است. اجتناب در صورت عدم بایستگی موکل به موارد فوق زبانی متوجه وکیل گردد وکیل به موجب این وکالت نامه اختیار نام دارد که هر گونه اموال منقول و غیر منقول (باستثناء کلیه وسائط نقلیه موتوری) متعلق به موکل را در داخل و با خارج از ایران رأساً شناسایی، تملک و به نام خود و یا هر شخصی که صلاح بداند انتقال رسمی و قطعی داده و از این محل زیان خود را جبران نماید. ضمناً موکل ضمن عقد خارج لازم حق عزل وکیل را از خود سلب و ساقط نمود.

هزینه های قانونی

حق الثبت به مبلغ: ۲۰۰.۰۰۰ ریال - شیوه پرداخت: پرداخت الکترونیک/PCPOS - شماره قرض: ۵۱۲۱۳۶۲۹۸۱۱۱۴۴ - شماره مرجع تراکنش: ۱۷۳۷۳۵۴۹۸۰۷ - تاریخ پرداخت: ۱۳۹۸/۷/۱۳-۱۱:۲۱ - مبلغ: ۷۲۴۰۰۰ - شماره کارت: ۶۱۰۴۰۰۰۰۵۲۹
هریبه صدور الکترونیک سند رسمی به مبلغ: ۵۰۰.۰۰۰ ریال - شیوه پرداخت: پرداخت الکترونیک/PCPOS - شماره قرض: ۵۱۲۱۳۶۲۹۸۱۱۱۴۴ - شماره مرجع تراکنش: ۱۷۳۷۳۵۴۹۸۰۷ - تاریخ پرداخت: ۱۳۹۸/۷/۱۳-۱۱:۲۱ - مبلغ: ۷۲۴۰۰۰ - شماره کارت: ۶۱۰۴۰۰۰۰۵۲۹
حق التحریر به مبلغ: ۵۰۰.۰۰۰ ریال - شیوه پرداخت: پرداخت الکترونیک/PCPOS - شماره قرض: ۵۱۲۱۳۶۲۹۸۱۱۱۴۴ - شماره مرجع تراکنش: ۱۷۳۷۳۵۴۹۸۰۷ - تاریخ پرداخت: ۱۳۹۸/۷/۱۳-۱۱:۲۱ - مبلغ: ۷۲۴۰۰۰ - شماره کارت: ۶۱۰۴۰۰۰۰۵۲۹
حق التحریر اوراق اضافه به مبلغ: ۱۰۰۰.۰۰۰ ریال - شیوه پرداخت: پرداخت الکترونیک/PCPOS - شماره قرض: ۵۱۲۱۳۶۲۹۸۱۱۱۴۴ - شماره مرجع تراکنش: ۱۷۳۷۳۵۴۹۸۰۷ - تاریخ پرداخت: ۱۳۹۸/۷/۱۳-۱۱:۲۱ - مبلغ: ۷۲۴۰۰۰ - شماره کارت: ۶۱۰۴۰۰۰۰۵۲۹
مالیات بر ارزش افزوده به مبلغ: ۵۴.۰۰۰ ریال - شیوه پرداخت: پرداخت الکترونیک/PCPOS - شماره قرض: ۵۱۲۱۳۶۲۹۸۱۱۱۴۴ - شماره مرجع تراکنش: ۱۷۳۷۳۵۴۹۸۰۷ - تاریخ پرداخت: ۱۳۹۸/۷/۱۳-۱۱:۲۱ - مبلغ: ۷۲۴۰۰۰ - شماره کارت: ۶۱۰۴۰۰۰۰۵۲۹
جمع کل: ۷۲۴.۰۰۰ ریال



نامسر معز دانشی

• شماره سند و اطلاعات اصلی این برگه - در فضای الکترونیک توسط سر دفتر از طریق درگاه سازمان اسناد و املاک کشور به نشانی www.ssna.ir قابل تصدیق است
• هر گونه جعل در اسناد رسمی منتهی به مواد ۵۲۲ و ۵۲۴ قانون مجازات اسلامی می باشد.

POWER OF ATTORNEY

توكيل خاص

I, the undersigned, **KAMBIZ ATTAR KASHANI**, American national, and holder of passport No. [REDACTED] do hereby authorize **Mr. MOHSEN GHADERI**, American national, Passport No. [REDACTED] to act on my behalf to establish companies or establishment and open and to register it in Department of Economic Development, Immigration Department and Ministry of Labor or any government or non-government departments and to sign in front of Notary Public, or any other department on Memorandum of Association / Appointment of Local Service Agent / Civil Business Company or any amendments and to buy shares to establish company in my name from himself or any other company or to enter my name in existing license with his others and to register in my name in concerned authority in U.A.E. and to sell my shares from company owned by me to himself or any other party, and he has power to sign in amendment for memorandum of association and amendment for the share buying agreement, Partner adding or withdrawal / Name or Activity change or amendment for all changes in my licenses in front of Notary Public in United Arab Emirates and he have been authorized with all powers and right to run and operate and manage my companies on my behalf with all ministries, government or non-government departments, and on my behalf, he has right to open, close, and

أنا الموقع أدناه/كامبيز عطار كاشاني، أمريكي الجنسية وأحمل جواز سفر رقم: [REDACTED] وكنت السيد/محسن غديري، أمريكي الجنسية وأحمل جواز سفر رقم: [REDACTED] في أن يقوم مقامي وينوب عني لتأسيس شركات أو مؤسسات وفتحها وتسجيلها لدى دائرة التنمية الاقتصادية، دائرة الهجرة ووزارة العمل أو أي جهة حكومية أو غير حكومية، والتوقيع على عقد التأسيس/عقد تعيين وكيل خدمات/عقد شراكة أعمال مدنية أو ملحق عقد التأسيس/ملحق عقد بيع حصص أمام الكاتب العدل، أو أي جهة مختصة بذلك داخل دولة الإمارات العربية المتحدة، وله حق شراء الحصص باسمي لتأسيس شركة من نفسه أو من أي طرف آخر أو إدخال اسمي في شركة قائمة بشراكة معه أو مع الغير وتسجيلها لدى الدائرة المختصة باسمي وبيع حصصي في أي شركاتي لنفسها أو للغير، وللتوقيع على عقود ملحق لشراء الحصص/بيع الحصص لإدخال أو إخراج شركاء وتغيير اسم أو نشاط الشركة والتوقيع على ملحق عقد التأسيس لجميع التعديلات في رخصي أمام الكاتب العدل في دولة الإمارات العربية المتحدة، وإدارة وتشغيل شركاتي أو مؤسساتي نيابة عني بكافة صلاحياتي لدى جميع الوزارات والدوائر الحكومية أو غير الحكومية، وله الحق لفتح وإغلاق وتشغيل الحسابات البنكية باسم شركاتي أو مؤسساتي وتشغيل

[Handwritten signature]

التأسيس
شركة
التأسيس
شركة

DUBAI COURT NOTARY PUBLIC
TRUE COPY
No. [REDACTED]

operate the bank accounts in the name of my company's or establishments. Upon this I sign and request to attest the same from Notary Public as per rules.

الحسابات المفتوحة حاليا باسم شركاتي. وعليه اوقع واطلب توثيقه حسب الاصول من الكاتب العدل.

Principal:
KAMBIZ ATTAR KASHANI
Signature:

Kambiz Attar Kashani

الموكل:

كامبيز عطار كاشاني

Kambiz Attar Kashani



ناريخ ٢٠١١-١٢-٠٥ حضر امامي السيد / كامبيز عطار كاشاني وبعد العرف عليه وقع على المسند بحضوري حسب الاصول.

رقم الإصال ٣١٥٦٥٥

رقم المحرر ٢٠١١/١/١٦١٦٤٥

طوار ٧٩٩٦٨

الكاتب العدل

www.dc.gov.ae

