

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

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3 UNITED STATES OF AMERICA .
Plaintiff, .
4 vs. . Docket No. CR 17-46-RBW
5 KASSIM TAJIDEEN . Washington, D.C.
December 6, 2018
6 Defendant. .
7x 2:32 p.m.

8 TRANSCRIPT OF PLEA HEARING
9 BEFORE THE HONORABLE SENIOR JUDGE REGGIE B. WALTON
10 UNITED STATES DISTRICT JUDGE

11 APPEARANCES:

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1 APPEARANCES: [Cont'd]

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Official Court Reporter
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P R O C E E D I N G S

THE DEPUTY CLERK: Your Honor, this afternoon, this is matter of United States versus Kassim Tajideen. This is Criminal Record 17-46. Ask the parties to step forward and identify yourselves for the record, please.

MR. GILLICE: Good afternoon, your Honor, Tom Gillice on behalf of the United States, along with Joseph Palazzo from the Money Laundering Asset Recovery Section of the Department of Justice, and Jacqueline Barkett, a special assistant U.S. Attorney in my office.

THE COURT: Good afternoon.

MR. TAYLOR: Bill Taylor with Bill Murphy, Steven Herman.

THE COURT: Says he can hear?

MR. TAYLOR: Yes. Interpreter device is working.

THE COURT: Counsel want to identify themselves, defense.

MR. MURPHY: William Murphy also for the defendant, Mr. Tajideen.

MR. TAYLOR: I think I already did, but it's Bill Taylor for Mr. Tajideen.

THE COURT: I guess before we proceed I should ask Mr. Tajideen if he has any difficulty understanding the interpreter?

THE DEFENDANT: It's clear.

1 THE COURT: I had a couple of questions before we
2 proceed. One of those related to the waiver of appellate
3 rights. And a concern I had in reference to the extent of
4 that waiver; namely, the waiver of the, the waiver of a
5 statute if it's determined that that statute is
6 unconstitutional, and also waiver of the provision that if
7 the conduct doesn't fall within the statute that
8 nonetheless, there would be a waiver of any appellate
9 challenge in reference to that.

10 The concern I have regarding the constitutional
11 waiver I just don't understand how if somebody has allegedly
12 committed a crime that it's ultimately determined to be
13 unconstitutional, how that constitutional challenge can be
14 waived, and that's in fact inconsistent with the next
15 provision regarding collateral attack where the right to
16 challenge the unconstitutionality of a statute is reserved.

17 So I don't know why that conflict exists. And I
18 guess I just have a philosophical difficulty in
19 understanding how somebody can be found guilty of an offense
20 that ultimately is determined to be unconstitutional, or is
21 determined that their conduct fail or falls outside of the
22 scope of the applicable statute.

23 MR. GILLICE: If I may, your Honor?

24 THE COURT: Yes.

25 MR. GILLICE: Section D, Appellate Rights says

1 that the client agrees to waive the right to appeal, and
2 claim that the statute to which he is pleading guilty is
3 unconstitutional. Also we, agrees to waive an appeal to
4 claim that the committed conduct does not fall within the
5 scope of the statute. It's slightly different from the
6 challenge attack provision which says that he will waive any
7 right to challenge the sentence in other fashions, but
8 serves his right if a court later finds that the conduct to
9 which he is pleading guilty does not fall within the advent
10 of the statute.

11 So the difference being, if for example, a court
12 in another jurisdiction or the DC Circuit court in
13 responding to an appellate by another person were to find
14 that some particularity of what the defendant is pleading to
15 did not fall within the advent of the IEEPA statute or the
16 conspiracy statute then he would be able to argue that in an
17 appeal later on.

18 But he himself cannot raise that issue hereafter.

19 THE COURT: Okay.

20 MR. TAYLOR: These two paragraphs, the waiver of
21 the appeal rights and collateral attack, are designed to be
22 consistent with each other. If a defendant is convicted or
23 pleads guilty to an offense and the judge enters a judgment
24 of conviction then he cannot appeal that conviction on any
25 ground. He waives his rights to appeal except for

1 sentencing issues may be concerned.

2 We acknowledge that limitation of what he could
3 appeal to the Court of Appeals from. However, we preserved
4 his right to attack this conviction in the event that the
5 Court of Appeals or the Supreme Court determined that the
6 statute under which he was prosecuted was unconstitutional.
7 In other words, the waiver doesn't preclude him from
8 attacking on the basis of a subsequent development of law.

9 THE COURT: I understand. With that understanding
10 I agree that its appropriate.

11 MR. GILLICE: Your Honor, if I may just one more
12 thing before we commence with the entry of the plea?

13 THE COURT: Yes.

14 MR. GILLICE: At the close of the plea proceeding,
15 your Honor, we intend to ask the Court for permission to
16 file the plea agreement itself in a redacted form on the
17 public record. There is only one redaction from the plead
18 agreement, and so I'd ask the Court avoid mentioning that
19 paragraph on the public record. It's on page 12. It is
20 Subparagraph L of Section 9.

21 THE COURT: Okay.

22 MR. GILLICE: It contains routing information,
23 your Honor, for the forfeiture payment, and so we will ask
24 the Court to agree that that for secure purposes should be
25 --

1 THE COURT: Routing -- I'm sorry, this is on page
2 12?

3 MR. GILLICE: Page 12, it discusses the manner in
4 which the forfeiture judgment would be paid, the parties
5 through whom it would be paid.

6 THE COURT: Right. Where's the routing
7 information?

8 MR. GILLICE: Well, just the names of the parties
9 and the specifics that are listed there.

10 THE COURT: Any objection?

11 MR. TAYLOR: No, we asked for it.

12 THE COURT: Very well. Now is it anticipated that
13 he would be sentenced today?

14 MR. GILLICE: No, your Honor.

15 THE COURT: Okay. I didn't think that was the
16 case. Okay. And at what point do you all anticipate coming
17 back before me for sentencing?

18 MR. GILLICE: We preliminarily discussed a date in
19 January. What needs to happen between now and then, of
20 course, the Court needs to accept the guilty plea or
21 indicate that it would accept it, and the defense counsel
22 need to file a motion to withdraw its appeal. The D.C.
23 Circuit would need to act on that motion to withdraw the
24 appeal, and then the Court will have full jurisdiction then
25 to finally accept the plea and enter a sentence.

1 THE COURT: I assume the Court of Appeals will
2 grant that request, but what if they opted not to, then all
3 we would do here would be null and void, right?

4 MR. GILLICE: Technically, that's correct. The
5 D.C. Circuit has granted the defendant, the defendant's
6 unopposed motion for a limited remand to this Court for the
7 Court to hold this hearing?

8 THE COURT: They did?

9 MR. TAYLOR: Yes, but not for you to enter a final
10 judgment, so that's, he's right.

11 THE COURT: So I would only go through the plea
12 colloquy, but not enter a judgment until at some point
13 later?

14 MR. TAYLOR: Correct.

15 THE COURT: Okay.

16 MR. TAYLOR: And --

17 THE COURT: I've never had this happened before,
18 but --

19 MR. TAYLOR: Well, I've never done anything like
20 this, but I'm sure that it's, we've touched all the right
21 bases. The think that we are requesting the Court to do as
22 an initial matter is to approve the plea agreement. The
23 time of sentencing is driven by the financial transaction
24 that needs to occur to comply with his agreement in this, in
25 that paragraph which is being redacted. That's not

1 something that can happen quickly. So, and the plea -- and
2 the agreement says that by agreement of the parties
3 sentencing will not occur until after that money has been
4 delivered to the appropriate place.

5 So we need six weeks I think to get that done.
6 But in order to do that we need the Court to approve the
7 plea agreement and to enter what we're going to submit to
8 you tomorrow is a consent judgment of forfeiture.

9 THE COURT: Well if the government's confident
10 that I am aware of any prior criminal history that he has
11 that would be obviously my main concern. And if the
12 government is satisfied that what has been provided to me in
13 that regard is all that's out there then it would seem to me
14 that the agreement would be fair in reference to the term of
15 incarceration coupled with the amount of money he would have
16 to pay by way of the forfeiture.

17 MR. GILLICE: Your Honor, the defendant has no
18 criminal history in the United States. Has one prior
19 conviction in Belgium. The court may recall from our
20 detention hearing in which he was convicted of an offense
21 which the name escapes me right now, but it had to do with
22 inaccurate statements on documents, so in essence forged
23 documents and that conviction was in --

24 MR. TAYLOR: 2003.

25 MR. GILLICE: -- 2003.

1 THE COURT: Well, I mean, if the government is
2 confident that that's the only criminal history that he has
3 then it would seem to me that what has been agreed to by the
4 parties pursuant to 11(C)(1)(c) would be reasonable.

5 MR. TAYLOR: Thank you, your Honor.

6 MR. GILLICE: Thank you, your Honor.

7 THE COURT: Okay. So I don't think then I need to
8 cover in my colloquy with him at this time those provisions
9 that relate to 11(C)(1)(c) in regards to if I did not agree
10 to the agreement, so I don't think I need to cover those
11 provisions.

12 MR. TAYLOR: We agree.

13 THE COURT: Okay. Place him under oath.

14 Thereupon,

15 KASSIM TAJIDEEN

16 having been first duly sworn by the Deputy Clerk, was
17 examined and testified, as follows:

18 THE DEFENDANT: Yes.

19 THE COURT: Okay. Counsel, I assume you've
20 thoroughly reviewed with your client the government's plea
21 letter dated November 23rd, 2018, and you're confident he
22 understands the provisions set forth therein, that you also
23 reviewed with him the Statement of Facts and that he agrees
24 to those facts, also the elements of the offense, also the
25 various penalties that he faces, and also there's a Consent

1 Order of Forfeiture, and I assumed you've reviewed that with
2 him also?

3 MR. TAYLOR: I have, your Honor.

4 THE COURT: And you're confident he understands
5 all that information?

6 MR. TAYLOR: I am confident he understands, yes.

7 BY THE COURT:

8 Q Mr. Tajideen, you should understand that now that
9 you've been placed under oath that anything that you say to
10 me in response to the questions I'm going to ask you could
11 be used against you at some later time if you were charged
12 with perjury or for making a false statement. Do you
13 understand that?

14 A Yes, I do.

15 Q And do you understand what perjury means? That means
16 making a false statement after you've been placed under
17 oath?

18 A Yes, I do.

19 Q And understanding how any statements you make to me
20 could be used against, do you want to respond to my
21 questions?

22 A Yes.

23 Q How old are you sir?

24 A Sixty-three.

25 Q And how far did you go in school?

1 A Grade five.

2 Q Excuse me?

3 A Grade five.

4 Q And your home language is what? What language do you
5 speak?

6 A Arabic.

7 Q And the schooling that you received that was in Arabic?

8 A Yes.

9 Q And you're not having any difficulty understanding the
10 interpretation being provided to you today?

11 A Everything is clear.

12 Q Now have you ever been treated for any type of mental
13 illness or emotional disturbance?

14 A No.

15 Q Have you recently had any alcohol, any type of
16 medication or anything else that's affecting your ability to
17 understand what's going on here today?

18 A No.

19 Q Now I have before me this document, which is a letter
20 from the government's lawyer to your lawyer, setting forth
21 the terms of the plea agreement in this case. It is a 17
22 page document. And on the 17th page of the document I see
23 what appears to be your signature. Did you sign this
24 document?

25 A Yes.

1 Q And did you review the document with your lawyer before
2 you signed it?

3 A Yes.

4 Q And do you feel that you understand everything that's
5 in this document?

6 A Yes.

7 Q And do you need anymore time to review it with your
8 lawyer before we proceed?

9 A No.

10 Q Okay. I'm going to review the document with you to
11 make sure that we have the same understanding as to what
12 this agreement is. As I understand sir, you will plead
13 guilty to Count 11 of the superseding indictment which
14 charges you with conspiracy to launder monetary instruments,
15 which a violation of Title 18, of the United States Code,
16 Section 1956(h). Is that, in fact, what you're prepared to
17 plead guilty to today, sir?

18 A Yes.

19 Q Okay. I'm going to review with you the penalties that
20 you potentially face in this case. As far as prison is
21 concerned under this statute you could be sentenced up to 20
22 years in prison. Do you understand that?

23 A Yes.

24 Q As far as a fine, you could be required to pay a fine
25 of up to \$5,000, or two times the value of any property that

1 was involved in the illegal transactions that you're
2 pleading guilty to. Do you understand that?

3 MR. TAYLOR: May I, your Honor, you said five
4 thousand.

5 BY THE COURT:

6 Q \$500,000, I'm sorry. Do you understand that?

7 A Yes.

8 Q And in reference to any monetary or money obligation I
9 would impose in this case if you were given an opportunity
10 to pay that over time, and if you didn't pay it on time then
11 you could be required to pay penalties and interest
12 regarding late payments. Do you understand that?

13 A I understand.

14 Q And you're agreeable with that?

15 A Yes.

16 Q Now if you are required to serve a prison sentence once
17 you're released from prison, I could require that you be
18 under the visitation of our probation department for up to
19 three years. Do you understand that?

20 A Yes.

21 Q Also, I could require under the United States
22 Sentencing Guidelines that you pay for the cost of your
23 incarceration, if you are incarcerated, and then if you're
24 on supervision in the community the cost of your
25 supervision. Do you understand that?

1 In other words, it cost money to have somebody in
2 prison, and the taxpayers have to pay for that. If that
3 person is in the community being supervised it cost money
4 for that supervision. And again the taxpayers have to pay
5 for that. So if you are put in prison or if you're on
6 supervision in the community I could, if I found that you
7 could pay for those costs, I could require that you pay for
8 the cost of your incarceration and for the cost of your
9 supervision in the community.

10 Do you understand that?

11 A Yes.

12 Q I also must require that you pay to the court what is
13 called a special assessment, and that has to be in the
14 amount of \$100, and you have to pay that before you're
15 sentenced. Do you understand that?

16 A Yes.

17 Q There also is a forfeiture provision in this case, and
18 there also -- is this Consent Order of Forfeiture is that
19 operable? Or was there something else going to be
20 submitted?

21 MR. TAYLOR: That will be --

22 THE COURT: It will be something else presented?

23 MR. TAYLOR: We would like to file a motion
24 tomorrow to ask you to sign that order and place it under
25 seal for the same reasons that --

1 THE COURT: The same order?

2 MR. TAYLOR: Same order. We wanted you to see it,
3 but we would ask that it not be placed on the public record
4 but that it be sealed and we'll file such an application, a
5 joint application tomorrow.

6 THE COURT: Okay.

7 BY THE COURT:

8 Q Now in reference to the forfeiture provision, I
9 understand sir, that you are agreeing to the forfeiture
10 which is set forth in the forfeiture provision of the
11 superseding indictment that you're pleading guilty to; is
12 that right?

13 A Yes.

14 Q And as I understand, sir, that forfeiture that you're
15 agreeing to is a money judgment in the amount of
16 \$50 million; is that right, sir?

17 A Yes.

18 Q And that you will satisfy that money obligation as set
19 forth in the superseding indictment; is that right?

20 A Yes.

21 Q And the payment of that \$50 million would be that
22 amount minus any credit that you're entitled to under
23 Section G of the 11th provision of this agreement and as I
24 understand that amounts to \$4,521,033.59; is that right,
25 sir?

1 A Yes.

2 Q And therefore that would leave a balance of
3 \$45,478,966.41; is that right?

4 THE INTERPRETER: Sir, your Honor, I did not get
5 the number.

6 THE COURT: \$45,478,966.41.

7 THE DEFENDANT: Yes.

8 BY THE COURT:

9 Q And did you have an opportunity to look at page 12 and
10 11 of this agreement which sets forth those amounts of money
11 that you're entitled to a credit for?

12 A Yes.

13 Q And you agree that those amounts are accurate?

14 A Yes.

15 Q Now understanding the -- well, also I could require
16 that you pay restitution in this case which would be any
17 loss of money that occurred as a result of your conduct. Do
18 you understand that?

19 A Yes.

20 Q However, the government is not asking me to impose any
21 type of restitution obligation. Do you understand that?

22 A Yes.

23 Q Now the government has indicated what they believe your
24 prior criminal history is. And it would not qualify you as
25 a career criminal, but I still have to advise you that if it

1 were determined that you had been convicted in the past of
2 two or more either crimes of violence or felony drug
3 convictions that you would then qualify as a career
4 criminal. And if you qualified as a career criminal then
5 the sentence I could impose could be greater than what I
6 have already indicated. In fact, under certain
7 circumstances it could mean you incarcerated for the rest of
8 your life without the possibility of ever being released.
9 Do you understand that?

10 A Yes.

11 Q Understanding everything I've indicated to you in
12 reference to the potential penalties that you face by
13 pleading guilty in this case, do you still want to enter a
14 plea of guilty?

15 A Yes.

16 MR. TAYLOR: With respect, your Honor, I don't
17 believe you asked him about the five years.

18 THE COURT: Five years.

19 MR. TAYLOR: The agreed upon.

20 BY THE COURT:

21 Q Oh, I'll get to that. I haven't gotten to the
22 1(c)(1)(C) provision yet. Now in consideration of your
23 pleading guilty to the offense I've indicated I understand
24 the government has agreed not to prosecute you civilly or
25 criminally for money violations in furtherance of the

1 specific, unlawful activity of violating the International
2 Emergency Economic Powers Act that occurred during the
3 period of the conspiracy as set forth in the Statement of
4 Offense, or for such legal violations during the same period
5 set forth in the Statement of Facts. Is that also your
6 understanding?

7 A Yes.

8 Q I also understand that the government will request that
9 I dismiss the remaining counts of the superseding indictment
10 in this case with prejudice at the time of your sentencing.
11 Do you understand that?

12 A Yes.

13 Q However, I understand that you agree that the United
14 States has evidence supporting those charges that are being
15 dismissed. Do you agree to that?

16 A Yes.

17 Q Now the government does expressly reserve the right to
18 prosecute you for any crime of violence whether it's a crime
19 of violence under the United States Code or the District of
20 Columbia code, if in fact you committed such a crime of
21 violence prior to or after you signed this agreement. Do
22 you understand that?

23 A Yes.

24 Q However, the government does represent that it is not
25 aware that you've engaged in any type of crime of violence.

1 Do you understand that?

2 A Yes.

3 Q Now I understand that after you have entered your plea
4 of guilty to the offense you're pleading guilty to in this
5 case that your wife, Huda Hussein Saad, and that your four
6 children will not be prosecuted criminally or civilly by the
7 government for any International Emergency Economic Powers
8 Act violations, or money laundering offenses in furtherance
9 of those violations that occurred or occurring during the
10 time set forth in the Statement of Offense. Nor for
11 conspiracy to defraud the United States during that same
12 period of time as set forth in the superseding indictment.
13 Is that also your understanding?

14 A Yes.

15 Q And I understand that you understand that the agreement
16 not to prosecute only applies to persons and companies set
17 forth in Section III of this agreement on page 2 and 3. And
18 so that I don't butcher the names of the company I'll have
19 counsel for the record indicate what the name of those
20 companies are.

21 MR. TAYLOR: Shall I do it?

22 THE COURT: Either one.

23 MR. TAYLOR: International cross trade company.

24 THE DEFENDANT: Yes.

25 MR. TAYLOR: Sicam Limited, Epsilon Trading FZE,

1 Ovlas Trading SA, Golfrate Holdings, Angola Limitada, Afri
2 Belg Comercio E Industria, LDA; All Commerce-Angola, LDA;
3 Chirang Commercial, LDA; Massabia, LDA; Muteba Distribuicao,
4 S.A.; Afrimex SAL Off-shore; Al Massar Real Estate Company;
5 Delhamiyeh Development Company a/k/a DeldiCo; Delhamiyeh
6 Rural Club; Elissar General Trading, LLC; Galaxy Flame
7 Trading SAL Off-Shore; Societe Rifiyeh pour l'Amelioration
8 Immobiliers SARL, a/k/a Company for Rural Property
9 Development; Impex International Limited; Grupo Arosfran
10 Empreendimento e Participacoes SARL; Ovlas Trading SA SAL
11 Off-Shore; FozKudia Industrial, LDA; Cogimbo; Cedar Man SAL
12 Off-shore; Murex Investment and Development SAL Off-Shore;
13 Oriental International Limited (RAK Off-shore); and Tanit
14 Plastics Limited, LDA.

15 BY THE COURT:

16 Q Now sir, is that your understanding of the companies
17 that are covered by this agreement?

18 A Yes.

19 Q And I didn't mention the name of your four children who
20 are also subject to this agreement, and I should indicate
21 their names on the record. Those four children I understand
22 are Ali Kassim Tajideen, Mohamad Kassim Tajideen, Hussen
23 Kassim Tajideen, Sylvana Kassim Tajideen; is that correct,
24 those are the four children we're talking about?

25 A Sylvana.

1 Q Okay.

2 A Yes.

3 Q Now there is an agreement that you've reached along
4 with your lawyers and the government regarding what the
5 appropriate sentence is in this case. It's being
6 recommended to me under what is called Rule 11 (C) (1) (c) of
7 the Federal Rules of Criminal Procedure. And that agreement
8 provides that you would be sentenced to a term of 60 months
9 incarceration, minus any time that you're entitled to
10 receive while you were detained pending your sentencing and
11 also what is called good time credit you would receive based
12 upon your good behavior while you're incarcerated, or any
13 other reduction that you're entitled to.

14 Is that also your understanding, sir?

15 A Yes.

16 Q And there's an agreement that once you serve that
17 sentence that you would not be required to serve a period of
18 either supervised release or probation. Is that also your
19 understanding?

20 A Yes.

21 Q And as I indicated before that there also would be a
22 forfeiture of a money judgment in amount of \$50 million, and
23 that has to be paid before you're sentenced. Is that also
24 your understanding?

25 A Yes.

1 Q Also there is an agreement as I indicated before that
2 there would not be a fine imposed.

3 A Yes.

4 Q Also there is an agreement that the government will not
5 seek to have you pay restitution as a part of your sentence.
6 Is that also your understanding?

7 A Yes.

8 Q And those are the only agreements that you have with
9 the government about what your sentence should be?

10 A Yes.

11 Q Now I also understand that both you and the government
12 have reserved your right to describe fully both orally and
13 in writing to me the nature and seriousness of your
14 misconduct including any misconduct not described in the
15 charge that you're pleading guilty to. Is that also your
16 understanding?

17 A Yes.

18 Q I also understand that you and the government agree
19 that the factual basis underlying the Office of Foreign
20 Assets Controls designation of you is not relevant for the
21 purpose of the sentencing in this case. Is that your
22 understanding?

23 A Yes.

24 Q I also understand the government has previously
25 informed you and your lawyers and is informing me now that

1 at sentencing it does not intend to prove or argue that you
2 supported Hezbollah or terrorism or any other facts that
3 allegedly supported your designation as a designated, I'm
4 sorry, as a specially designated global terrorist by the
5 United States Department of Treasury, Forfeiture Assets
6 Control. Is that your understanding?

7 A Yes.

8 Q Therefore, any arguments made by the government about
9 sentencing shall not include any such allegations. Do you
10 understand that?

11 A Yes.

12 Q Also I understand that any arguments that you or your
13 lawyers make regarding sentencing will not seek to refute
14 the factual basis for the Office of Foreign Assets Control
15 designation; is that right?

16 A Yes.

17 Q I also understand that you and the government agree
18 that the Office of Foreign Assets Control designation of you
19 as a Specially Designated Global Terrorist was not enforced
20 at the time of the conduct described in the superseding
21 indictment and the Statement of Facts, and that the
22 existence alone of said designation without regard to its
23 factual basis supports the guilty plea that you're entering
24 in this case. Do you agree to that?

25 MR. TAYLOR: Respectfully, your Honor, I believe I

1 heard you say was not enforced. The agreement is tentative
2 that it was enforced.

3 BY THE COURT:

4 Q Okay. You understand that change that it was enforced?

5 A Yes.

6 Q And you agree to that?

7 A Yes.

8 Q And is there an agreement that I would proceed to your
9 sentencing without receiving a presentence report. And
10 based upon the government's agreement to proceed in that
11 manner and their representation about what your criminal
12 history is I would agree to do that. Do you understand
13 that?

14 A Yes.

15 Q And also I understand that you appreciate that your
16 lawyers will provide to the extent necessary any additional
17 information needed for your designation by the Federal
18 Bureau of Prisons or classification by the Federal Bureau of
19 Prisons. Do you understand that? Do you understand that,
20 sir?

21 MR. TAYLOR: I don't think the interpreter got
22 your --

23 BY THE COURT:

24 Q That if there's additional information the Bureau of
25 Prisons needs regarding your designation and classification

1 your lawyers are agreeing they will provide that information
2 to the Bureau of Prisons. Do you understand that?

3 A Yes.

4 THE COURT: You wanted to say something, have
5 somebody from probation here.

6 MS. MOSES-GREGORY: Thank you, Judge, Renee
7 Moses-Gregory on behalf of probation. For the record, your
8 Honor, based on the sentence that the defendant has agreed
9 to, we as a practice if there is no presentence report
10 completed we do a supplemental report to the Bureau of
11 Prisons, and we conduct an interview as if we were preparing
12 a presentence report.

13 THE COURT: And how long will it take for you to
14 do that?

15 MS. MOSES-GREGORY: It's something that's done
16 after sentencing.

17 THE COURT: It's done after sentencing?

18 MS. MOSES-GREGORY: Yes, your Honor. So we would
19 want -- I don't know how quickly the defendant would be
20 transferred or designated, but we would want to interview
21 him as soon as possible.

22 THE COURT: Okay. Well, we'll have to obviously
23 let you know when the sentencing will be. I'm not sure
24 exactly when that will be. The party indicated about six
25 weeks from now?

1 MR. TAYLOR: We were looking for January 18th,
2 your Honor, if that's agreeable with you.

3 THE COURT: I know I have some time I have to be
4 in Pittsburgh in trial. Let me see, January 18th you said?

5 MR. TAYLOR: Yes.

6 THE COURT: That is available. I assume I might
7 be in Pittsburgh, but hopefully not. We'd have to do it at
8 two o'clock.

9 MS. MOSES-GREGORY: And your Honor, I do not know
10 where he's being housed, the defendant right now, we can do
11 the interview prior --

12 MR. TAYLOR: Stafford jail, Stafford, Virginia.

13 MR. GILLICE: Rappahannock.

14 THE COURT: That's a good distance from here.

15 MS. MOSES-GREGORY: Your Honor, our marshal
16 service is very accommodating, and we could send a request
17 and ask that --

18 THE COURT: He be brought up?

19 MR. TAYLOR: We're happy to coordinate with the
20 probation department.

21 THE COURT: Okay.

22 MS. MOSES-GREGORY: Thank you, your Honor.

23 BY THE COURT:

24 Q Thank you. Now sir, to the extent there's been an
25 agreement between you your lawyers and the government

1 regarding what should be said or not said or what should be
2 done in reference to your sentencing those agreements only
3 apply at the time of your sentencing and they do not apply
4 if there are any proceedings that would take place after
5 you're sentenced either before me or before the Federal
6 Bureau of Prisons. Do you understand that?

7 A Yes.

8 MR. TAYLOR: May I, your Honor. There's a
9 provision in this agreement that provides that in the event
10 Mr. Tajideen petitions to the Bureau of Prisons for transfer
11 --

12 THE COURT: I haven't gotten to that yet.

13 MR. TAYLOR: -- to Belgium that this is a post
14 sentencing matter in which the government is bound as a term
15 of the contract under certain circumstances.

16 THE COURT: Okay. I was going to go over that, I
17 hadn't gotten there yet.

18 BY THE COURT:

19 Q Now I also understand that the government will not
20 object to your request of me for recommendation that you be
21 designated to serve your sentence by the United States
22 Bureau of Prisons at a minimum security institution, or to
23 be, or to a specified institution that you and your lawyers
24 select that meets your particular needs as long as that
25 institution is at least a minimum security institution

1 affiliated with the United States Bureau of Prisons. Is
2 that also your understanding, sir?

3 A Yes.

4 Q Also I understand that the government is not opposing a
5 request to the Federal Bureau of Prisons that you be
6 permitted to serve your sentence in a facility in the
7 kingdom of Belgium pursuant or under International Prisoner
8 Transfer program, if and only if, the government receives
9 assurances from the government of Belgium that the length of
10 your incarceration will not be reduced beyond any reduction
11 you're entitled to receive as calculated by the United
12 States Bureau of Prisons.

13 Do you understand that, sir?

14 A Yes.

15 Q Also, you should understand that the government once
16 you're sentenced is not obligated after the sentence is
17 imposed to request that that sentence be reduced. Do you
18 understand that?

19 A Yes.

20 Q I also understand that the government is going to
21 request that you be detained pending your sentencing. I
22 understand that you will not object to that request provided
23 that you continue to be detained at the Rappahannock
24 Regional jail pending your sentencing. Is that also your
25 understanding?

1 A Yes.

2 Q Now there are a number of waivers that you've agreed
3 to. I'll cover some of those now and some later. But one
4 of the waiver or rights that you're giving up is what is
5 called a waiver of venue in the United States, if somebody
6 is accused of committing a crime, then they have a right to
7 have their case tried or held in a particular location in
8 the United States. I understand that you're waiving or
9 giving up any challenge that you could make that that is not
10 appropriately here in the District of Columbia. Is that
11 right?

12 A Yes.

13 Q You're also waiving what is called a statute of
14 limitation offense, and in reference to most criminal
15 offenses there is what is called a statute of limitations,
16 which means that a person has to be charged with a crime
17 within a certain period of time after they committed that
18 crime. If they are charged with that crime after that time
19 has expired then the person can say it's too late to charge
20 me, and if they can show that's right then the charges would
21 have to be dismissed. Do you understand that?

22 A Yes.

23 Q I understand that you're waiving our giving up that
24 right, which means if at the time you signed this agreement
25 there were other criminal offenses you could be charged

1 with, and if for some reason this guilty plea went away and
2 if at that later time the government was seeking to charge
3 you with those offenses you would not be able to say it's
4 too late to charge me with those offenses because it was not
5 too late at the time you signed this agreement.

6 Do you understand that?

7 A Yes.

8 Q Now you're waiving a number of trial rights, and I'll
9 cover most of those later. One of the rights you have is
10 the right to receive information from the government about
11 your case. To the extent that they haven't already provided
12 that information to you, I understand that you're giving up
13 your right or waiving your right to receive that information
14 from the government in the future; is that right, sir?

15 A Yes.

16 Q Now normally when somebody is going to plead guilty and
17 if they have discussions with the government about their
18 case and tell the government things about their case, trying
19 to negotiate a plea, and then when they come into a plea
20 hearing like this they make further statements about their
21 case, if for some reason their guilty plea goes away
22 normally those statements they made negotiating with the
23 government and the statements they make before a judge at a
24 hearing like this can't be used against them in future
25 criminal or civil cases. Do you understand that?

1 A Yes.

2 Q But I understand that you're giving up that right, so
3 if you did make any statements to the government negotiating
4 your plea with them, and if you make any statements here
5 today about your case if for some reason this guilty plea
6 goes away and then you're prosecuted for offenses related to
7 what was said those statements would be able to be used
8 against in the future. Do you understand that?

9 MR. TAYLOR: Respectfully, your Honor, that waiver
10 applies if he withdraws his plea or withdraws from the
11 agreement.

12 THE COURT: That's what I said if it goes away for
13 some reason.

14 MR. TAYLOR: Well, if he withdraws from the
15 agreement he has not waived the protections. I beg your
16 pardon. You read it correctly.

17 BY THE COURT:

18 Q You understand that, sir?

19 A Yes.

20 Q Understanding that, do you still want to plead guilty?

21 A Yes, I understand.

22 Q And understanding that, do you still want to plead
23 guilty?

24 A Yes.

25 Q Now I don't think this is going to be an issue because

1 I would expect that we're going to go to sentencing sometime
2 in the near future, sometime in January, but you are under
3 this agreement giving up your right to a speedy sentencing.
4 You do have a right to a speedy sentence, which mean you
5 have to be sentenced within a reasonable period of time
6 after you've entered your plea of guilty. Do you understand
7 that?

8 A Yes.

9 Q Now you are giving up certain rights that you have
10 regarding an appeal. And the right to an appeal is the
11 right to take your case to a Higher Court to raise issues
12 about what took place in this court. Do you understand
13 that?

14 A Yes.

15 Q And the rights you're giving up you're giving up the
16 right to go to the Higher Court to say that the statute that
17 you're pleading guilty to is unconstitutional in violation
18 of the United States Constitution. Do you understand that?

19 A Yes.

20 Q And you're also giving up your right to go to the
21 Higher Court and to say to that court that the conduct you
22 engaged in is not covered by the statute that you're
23 pleading guilty to. Do you understand that?

24 A Yes.

25 Q And in reference to your sentencing you also are giving

1 up the following rights and that's the right to challenge
2 the term of your incarceration, the fine if there were a
3 fine, the forfeiture which you've agreed to, an award of
4 restitution which the government isn't requesting, and the
5 terms of conditions of your supervised release, but the
6 government is not requesting that you receive supervised
7 release. And the authority of me to set conditions of your
8 release, and also the manner in which your sentence was
9 imposed. Do you understand that?

10 A Yes.

11 Q However, you do keep the right because the law says I
12 can only give you a certain sentence. And if I gave you a
13 sentence above what the law permits you'd have a right to
14 take that to a Higher Court. And although it's not going to
15 apply here if the sentencing guidelines were applied, and I
16 gave you a sentence above the top of the sentencing
17 guidelines then you'd have a right also to take that issue
18 to the Higher Court. Do you understand that?

19 A Yes.

20 Q Also, if you were to take the position that your
21 lawyers had not provided to you appropriate legal
22 representation you would also still have a right to take
23 that issue to the Higher Court. Do you understand that?

24 A Yes.

25 Q I assume you all have explained to him the

1 circumstances regarding the Court of Appeals and what needs
2 to be done in reference to that. Do you think I need to
3 cover that with him?

4 MR. TAYLOR: I don't think so. We have explained
5 to him that if you indicate provisionally that you will
6 accept the plea then we will move the Court of Appeals to
7 dismiss the appeal in its entirety and remand the entire
8 case to you.

9 BY THE COURT:

10 Q Do you understand that? I have had a chance to look at
11 this plea agreement, to consider what the government says
12 your prior history is, to consider what the agreement is
13 regarding what the sentence should be and I do think that
14 the agreement is reasonable. And under those circumstances
15 absent me finding out some additional information, which I
16 assume will not be the case, I would agree to the plea
17 agreement that's been agreed to by you, your lawyer and the
18 government. Do you understand that?

19 A Yes.

20 Q And based upon that, your lawyers as I'm sure they have
21 told you, will go to a Court of Appeals where the case is
22 pending now and ask that the case be sent back to this
23 Court, so I can enter a final judgment regarding your
24 sentencing. Do you understand that?

25 A Yes.

1 Q Now a person who has pled guilty to a case under
2 certain circumstances can bring their case back to this
3 Court to challenge the sentence that they received. Do you
4 understand that?

5 A I understand.

6 Q Now I understand that you're giving up most of those
7 rights. However, if you were to discover what is called
8 newly discovered information, information that you didn't
9 know about at the time of your sentencing and that would
10 have an impact on your sentencing, then you would have a
11 right to bring that new information to me in support of
12 reducing your sentence. Do you understand that?

13 A Yes.

14 Q Also to the extent that the United States Court of
15 Appeals for the District of Columbia or the Supreme Court
16 would determine that the conduct that you engaged in is
17 conduct that's not covered by the statute that you pled
18 guilty to then you'd also have a right to bring that issue
19 back to me in support of your challenging your sentence. Do
20 you understand that?

21 A Yes.

22 Q Also, if you were to take the position that you had not
23 received appropriate representation from your lawyers you
24 have a right to bring that issue to me in support of
25 changing your sentence. Do you understand that?

1 A Yes.

2 Q Now although it really doesn't apply in this case, if
3 you were sentenced under the United States Sentencing
4 Guidelines, and those guidelines were changed to your
5 benefit then you'd have a right to bring that issue to me in
6 support of your sentence being reduced. Do you understand
7 that?

8 A Yes.

9 Q Now there are two federal laws that sometimes people
10 who are convicted of a crime or pled guilty to a crime will
11 use in order to try and find information about their case
12 after they've been sentenced. And one of those is the
13 Privacy Act and the other one is the Freedom of Information
14 Act. Do you understand that?

15 A Yes.

16 Q I understand that you're giving up your right to use
17 either one of those statutes to get additional information
18 about your case from the government after you're sentenced.
19 Do you agree to that?

20 A Yes.

21 Q And we've covered at least in part the restitution
22 obligation you have in this case. But you do have an
23 obligation as a part of this agreement to pay the
24 \$50 million restitution and it has to be paid before you're
25 sentenced. And it will be paid to the Clerk of the Court.

1 Do you understand that?

2 MR. TAYLOR: I think it's paid to United States
3 Marshals Service.

4 THE COURT: It says payment of restitution, if
5 any, shall be made to the Clerk of the Court under --

6 MR. TAYLOR: That's restitution. There is no
7 restitution.

8 THE COURT: I'm sorry, restitution. There is no
9 restitution, so I don't need to cover that.

10 BY THE COURT:

11 Q But in reference to -- you're right, in reference to
12 the forfeiture then that would be, you have an application
13 to pay that to the government before you're sentenced. Do
14 you understand that, sir?

15 A Yes.

16 Q And you agree that the information set forth in the
17 superseding indictment is sufficient justification for the
18 forfeiture in this case?

19 A Yes.

20 THE COURT: Is there anything else regarding the
21 restitution. There's a lot here, but it doesn't seem to
22 apply. As I understand he will make the arrangements to pay
23 the remainder of the restitution as otherwise is not already
24 collectible, and that he'll pay that before he's sentenced.

25 MR. TAYLOR: Not to be a pest, but you continue to

1 refer to it as restitution.

2 THE COURT: It's forfeiture. My fault.

3 MR. TAYLOR: Just so the record. Yes, we've been
4 through it thoroughly.

5 THE COURT: Anything else?

6 MR. GILLICE: I ask that the Court go through
7 Paragraph D in the Forfeiture Section XI(d).

8 MR. TAYLOR: Yes.

9 BY THE COURT:

10 Q Okay. Now I understand that you, sir, and the
11 government have agreed that if banking issues prevent funds
12 from being transferred by the date of the scheduled
13 sentencing that you and the government will jointly request
14 a delay in the scheduled sentencing date. Do you understand
15 that?

16 A Yes.

17 Q I understand that you and the government further agree
18 that if the transfer of funds described in reference to the
19 forfeiture is not accomplished prior to 180 days after you
20 enter your guilty plea before this Court, or any earlier
21 deadline that I set for the transfer of these funds that you
22 will be deemed to have breached or violated this agreement.
23 Do you understand that?

24 A Yes.

25 Q Also, in reference to the forfeiture in this case there

1 are certain constitutional rights under the United States
2 Constitution and also under the statutes of the United
3 States related to the forfeiture of property that you can
4 either argue before this Court or on appeal. I understand
5 that you're waiving or giving up any arguments you can make
6 regarding the forfeiture of the \$50 million either before
7 this Court or before a Higher Court; is that right?

8 A Yes.

9 Q I assumed since you don't live here and you've never
10 lived here that you are not going to oppose you being
11 deported or removed from this country and sent back to your
12 home country; is that right?

13 A Yes.

14 Q And because of the crime that you are pleading guilty
15 to you would have to be removed from this country after you
16 finished your sentence and sent back to your home country.
17 Do you understand that?

18 A Yes.

19 Q And you agree to that?

20 A Yes.

21 Q And understand that you are agreeing to a stipulated
22 order of the court for your removal under the United States
23 Code; is that correct?

24 A Yes.

25 Q And you are consenting to that order being executed and

1 you being removed from the country?

2 A Yes.

3 Q And under the United States Code you do have a right to
4 receive notice that the government is seeking your removal,
5 but I understand that you're giving up your right to receive
6 that notice; is that right?

7 A Yes.

8 Q And the United States I understand has sought and has
9 received permission from the secretary of the Department of
10 Homeland Security to seek your removal from the United
11 States. Do you understand that?

12 A Yes.

13 Q And you understand the government is requesting that I
14 make a finding that you have consented to your removal from
15 the country and that I will agree to that. Do you
16 understand that?

17 A Yes.

18 Q So you understand that you're not going to be taking
19 any position in support of you not being removed from the
20 United States once you finish your sentence. Do you
21 understand that?

22 A Yes.

23 Q And you're agreeable to fully cooperating with the
24 government regarding your removal from the country of the
25 United States. Do you understand that?

1 A Yes.

2 Q Now you do have an obligation to comply with all of the
3 terms and conditions of this agreement and you also have an
4 obligation not to commit any further criminal offenses
5 before you're sentenced. Do you understand that?

6 A Yes.

7 Q If you did not comply with the terms of this agreement
8 or if you committed a new crime there are certain
9 consequences and those are the following; number one, if you
10 violate or not comply with the agreement then the government
11 would be able to walk away from every promise they made to
12 you in this agreement. Do you understand that?

13 A Yes.

14 Q And even though they could walk away from their end of
15 the bargain you nonetheless, would be stuck with this
16 agreement. Do you understand that?

17 A Yes.

18 Q And to the extent that they've agreed not to prosecute
19 you for other criminal offenses that they agreed to dismiss
20 or not pursue, if you breach or violate the agreement then
21 they would be able to prosecute you for those offenses. Do
22 you understand that?

23 A Yes.

24 Q Also, any statements that you would have made to them
25 about this case or any information you provided to them or

1 evidence that you provided to them they would be able to use
2 that evidence against you in future criminal or civil cases
3 because you violated the agreement. Do you understand that?

4 A Yes.

5 Q And that would include any information that you may
6 have provided to them that you consider to be off the
7 record. Do you understand that?

8 A Yes.

9 Q Now if they took the position you violated this
10 agreement by not complying with the terms of the agreement
11 they only have to prove that violation by what is called a
12 preponderance of the evidence. Which means they only have
13 to show that it's more likely than not you violated the
14 agreement. And if they made that showing I would have to
15 conclude that you did violate the agreement and the
16 consequences I just explained would apply. Do you
17 understand that?

18 A Yes.

19 Q If they took the position that you committed a new
20 crime before you were sentenced and that was the basis for
21 the violation they would only have to show that violation by
22 what is called probable cause, which means they'd only have
23 to show it's more probable than not that you did in fact
24 commit the new crime. And again, if I find they made that
25 showing I would have to conclude that you did violate the

1 agreement and the consequences I've just explained would
2 apply. Do you understand that?

3 A Yes.

4 Q Now you should understand that nothing in this
5 agreement should be considered by you to permit you to
6 commit the crimes of perjury, to make false statements or
7 declarations, or to obstruct justice, or to protect you from
8 prosecution for any crimes not included within this
9 agreement committed by you after you signed this agreement.
10 Do you understand that?

11 A Yes.

12 Q And if you did anything of that nature that would be a
13 breach or violation of the agreement and the government
14 would be able to charge you with that conduct. Do you
15 understand that?

16 A Yes.

17 Q Now as I understand what you've been reviewing with you
18 this 17 page agreement, that this is the entire agreement
19 that you have with the government. Now I didn't explain to
20 you what would happen if I decided not to accept the
21 agreement, but I have decided to accept the agreement. So
22 besides those provisions related to that is there anything
23 else that you've agreed to with the government regarding
24 your guilty plea?

25 A No.

1 THE COURT: Is there anything else that government
2 counsel or defense counsel believe I need to cover with
3 Mr. Tajideen before we proceed further?

4 MR. GILLICE: Not from the plea agreement, no.

5 BY THE COURT:

6 Q Okay. Now sir, in order for the government to prove
7 you guilty of the offense that you're pleading guilty to
8 they would have to prove the following three things. One
9 they would have to prove that you conspired with one or more
10 other persons you understand that to commit the crime you're
11 pleading guilty to.

12 A Yes.

13 Q And they'd have to prove that you conspired with one or
14 other persons to commit international money laundering; that
15 is, to transport, transmit or transfer, or attempt to
16 transport, transmit, or transfer a money instrument or funds
17 from a place in the United States to or through a place
18 outside the United States, or to a place in the United
19 States from or through a place outside of the United States.
20 Do you understand that?

21 A Yes.

22 Q And they'd have to prove that you did that with the
23 intent to promote, the carrying on of a specific unlawful
24 activity here a violation of the International Emergency
25 Economic Powers Act, which is Title 15 of the United States

1 Code, Section 1701 to Section 1706. Do you understand that?

2 A Yes.

3 Q Now I have before me this document entitled *Statement*
4 *of Facts*. It is a six page document, and on the sixth page
5 I see what appears again to be your signature. Did you sign
6 this agreement, sir?

7 A Yes.

8 Q And did you review the document with your lawyer before
9 you signed it?

10 A Yes.

11 Q And do you understand everything that's in this
12 document?

13 A Yes.

14 Q And do you agree to everything that's in the document?

15 A Yes.

16 THE COURT: You and your lawyer can have a seat
17 for a minute. I'll have the government read into the record
18 or summarize what's in the document. Listen very carefully
19 to what he says because once he's finished I'll ask you some
20 questions.

21 MR. GILLICE: Your Honor -- Court's brief
22 indulgence.

23 Had this case gone to trial on Count 11 of the
24 superseding indictment, conspiracy to launder monetary
25 instruments in violation of 18 U.S.C. 1956(h), the

1 government would prove the following facts beyond a
2 reasonable doubt; first, on May 27, 2009, Kassim Tajideen
3 was designated and publicly listed as a specially designated
4 global terrorist or SDGT by the United States Department of
5 treasurer, Office of Foreign Assets Control or OFAC located
6 in the District of Columbia.

7 Kassim Tajideen maintains that his designation is
8 improper, even though he never provided financing or any
9 other support to any other terrorist organization or
10 Hezbollah. But Mr. Tajideen acknowledges that regardless of
11 this position his designation by OFAC and the prohibitions
12 on transactions attendant to it under the IEEPA and other
13 regulations, were in full force during the period of the
14 conspiracy as defined herein, and that other laws made it
15 unlawful for any person to violate, attempt to violate,
16 conspire to violate, or cause a violation of these
17 prohibitions.

18 At all times between May 27, 2009, and February 15
19 of 2018, Mr. Tajideen was aware of his status as an SDGT, as
20 well as the prohibitions against U.S. persons participating
21 in transactions with him.

22 At all relevant times during the conspiracy
23 period, Mr. Tajideen owned Sicam Limited of Angola and
24 international Cross Trade Limited or ICTC of the United Arab
25 Emirates.

1 At all relevant times during the conspiracy
2 period, Mr. Tajideen and at least five other individuals
3 under his leadership, including a person named Imad Hassoun,
4 were aware that because of his SDGT designation,
5 Mr. Tajideen's assets were blocked from entering or exiting
6 the United States, and that U.S. persons were legally
7 prohibited from transacting business with him or with
8 companies he owned without a license from OFAC.

9 During the conspiracy period, Mr. Tajideen, and
10 his co-conspirators conducted at least seven commercial
11 transactions with U.S. persons using ICTC to wire transfer
12 funds into the United States from the United Arab Emirates.
13 Commercial transactions were arranged through emails, text
14 messages and phone calls by Kassim Tajideen and by his
15 co-conspirators. These commercial transactions involve
16 purchases of commercial goods from U.S. persons not licensed
17 by OFAC, and constituting knowing, willful, criminal
18 violations of IEEPA by Mr. Tajideen.

19 During the conspiracy period, Mr. Tajideen and his
20 co-conspirators agreed and conspired to consummate these
21 transactions and other transactions by arranging
22 approximately 16 wire transfers of funds into the United
23 States originating outside the United States, and numerous
24 shipments of goods from America ports to places outside the
25 United States. Each wire transfer was intended to promote

1 an unlicensed transaction, which was a criminal IEEPA
2 violation.

3 During these transactions, Kassim Tajideen and his
4 co-conspirators took steps to conceal and mislead U.S.
5 persons regarding Mr. Tajideen's ownership of, and benefit
6 from, ICTC and Sicam.

7 During the conspiracy period, Mr. Tajideen and his
8 co-conspirators conspired to wire transfer money into or out
9 of the United States with the intent to promote unlicensed
10 transactions with U.S. persons, in violation of the business
11 prohibitions and blocking resolutions effected by OFAC
12 designation of Mr. Tajideen as an SDGT.

13 In furtherance of this conspiracy, Mr. Tajideen or
14 his co-conspirators caused a number of wire transfers of
15 funds into the United States from the United Arab Emirates,
16 on the dates shown, which total approximately \$5.56 million,
17 and are set forth in a table on page four of the Statement
18 of Facts.

19 Each of the listed wire transfers promoted
20 unlicensed transactions with U.S. persons that violated
21 IEEPA. Mr. Tajideen and his co-conspirators conducted wire
22 transfers totaling over \$50 million which promoted
23 violations of IEEPA.

24 In addition, had this case gone to trial the
25 government's evidence would have shown that during and in

1 furtherance of the conspiracy, Mr. Tajideen and his
2 co-conspirators, knowingly engaged in transactions outside
3 the United States, which involved transmissions of as much
4 as \$1 billion through the United States financial system
5 from places outside the U.S. which transmissions involved
6 the companies International Cross Trade Company and Epsilon
7 Trading FZE, of the United Arab Emirates. Mr. Tajideen
8 admits that he benefited from the transmissions referenced
9 in this paragraph.

10 In addition, had this case gone to trial,
11 Mr. Tajideen would have disputed the government's theories
12 seeking forfeiture of any funds or property other than those
13 based on the transactions specified in the superseding
14 indictment, which total approximately \$30 million.

15 BY THE COURT:

16 Q Okay. He can come back up. Mr. Tajideen, did you hear
17 what the prosecutor just read?

18 A Yes.

19 Q Do you agree with what he indicated?

20 A Yes.

21 Q Do you disagree with anything he said?

22 A No, no.

23 Q Okay. Now sir, you do have the absolute right to enter
24 a plea of not guilty in this case. By pleading not guilty
25 you would be forcing the government to take this case to

1 trial. During that trial the government would have the
2 burden of proving that you're guilty beyond a reasonable
3 doubt, and you also would have the right to have the help or
4 the assistance of a lawyer during your trial. Do you
5 understand that?

6 A Yes.

7 Q And do you understand that by entering a plea of guilty
8 that you're giving up all of those rights?

9 A Yes.

10 Q You also should understand that if you wanted to go to
11 trial in this case that you would have what is called the
12 right to a speedy trial. That means that the government has
13 an obligation to bring your case to trial within a
14 reasonable period of time after you were charged in this
15 case. If the government doesn't do that, then your lawyers
16 on your behalf, can request that these charges be dismissed
17 because you were not given your right to a speedy trial. Do
18 you understand that?

19 A Yes.

20 Q And do you understand that by entering a plea of guilty
21 that you're also giving up that right?

22 A Yes.

23 Q You also should understand that if you wanted to go to
24 trial in this case that you would have either the right to a
25 trial before a judge, which means the evidence would be

1 presented to me by the government, and they would have to
2 convince me beyond a reasonable doubt that you were guilty
3 of this crime in order for you to be convicted. In
4 addition, you would have the right to a trial before a jury,
5 which means that 12 people selected from the community would
6 hear the case, and the government would have to convince all
7 12 of those people beyond a reasonable doubt that you were
8 guilty of this crime that you're pleading guilty to before
9 you could be convicted. Do you understand that?

10 A Yes.

11 Q Now I have before me this document entitled *Waiver*
12 *Trial by Jury* with again seems to have your signature on it.
13 Did you sign this?

14 A Yes.

15 Q And did you review this with your lawyers before you
16 signed it?

17 A Yes.

18 Q And do you understand that by signing this document and
19 by entering a plea of guilty that you're giving up both your
20 right to a trial by a judge and your right to a trial before
21 a jury?

22 A Yes.

23 Q You also should understand that if you wanted to go to
24 trial in this case that during the trial the government
25 would have to bring into court those peoples who are

1 supposed to know something about this case. Each of those
2 individuals would have to take an oath to testify
3 truthfully. They'd have to testify with you present in the
4 courtroom. And after the government's lawyer finished
5 questioning those witnesses, your lawyer with your help,
6 would then have the right to cross-examine or question each
7 of those witnesses. Do you understand that?

8 A Yes.

9 Q And do you understand that by entering a plea of guilty
10 that you're also giving up those rights?

11 A Yes.

12 Q You also should understand that if you went to trial in
13 this case that during the trial you, yourself, would have
14 the right to bring into court witnesses who could testify to
15 help you. Do you understand that?

16 A Yes.

17 Q And if those people were not willing to voluntarily
18 come into court I could force them to appear. Do you
19 understand that?

20 A Yes.

21 Q Also you, yourself, would have the absolute right to
22 take the witness stand and testify in your own defense. Do
23 you understand that?

24 A Yes.

25 Q And do you understand that by entering a plea of guilty

1 that you're also giving up those rights?

2 A Yes.

3 Q You also should understand that if you went to trial in
4 this case that during the trial you would have what is
5 called the right or the privilege against
6 self-incrimination. That means that if you did not want to
7 testify during your trial no one could force you to do so.
8 You could sit there during the entire trial and say nothing.
9 And if you decided not to testify during your trial, I could
10 not say to myself as the judge and the jury could not say to
11 itself as the jury that merely because you were not
12 testifying and telling your side of the story must be some
13 indication that you're guilty. Do you understand that?

14 A Yes.

15 Q And do you understand that by entering a plea of guilty
16 you're also giving up that right?

17 A Yes.

18 Q And finally, you're giving the rights that I've
19 explained to you already regarding the rights you otherwise
20 would have on appeal except for the limited rights that I
21 told that you keep. Do you understand that?

22 A Yes.

23 Q Understanding the limited rights of appeal once you
24 enter a plea of guilty and understanding that you're giving
25 up all the other rights I just explained about pleading

1 guilty, do you still want to enter a plead of guilty?

2 A Yes.

3 Q Now besides what you and the government have agreed to
4 as to what your sentence should be in this case besides
5 those promises have any other promises been made to you
6 regarding me being lenient in order to what sentence you
7 should receive?

8 A No.

9 Q Has anybody threatened, forced, or coerced you to enter
10 this plea of guilty?

11 A No.

12 Q Whose decision is this to plead guilty yours or your
13 lawyer's?

14 A My decision.

15 Q And have you had an opportunity to fully discuss this
16 case with your lawyers?

17 A Yes.

18 Q And are you totally satisfied with the legal
19 representation they have provided to you?

20 A Yes.

21 Q Do you have any complaints you want to make about their
22 representation at this time?

23 A Yes.

24 Q Now are you entering this plea of guilty because you
25 are guilty?

1 A Yes.

2 Q And are you pleading guilty for any other reason other
3 than because you're guilty? Other than the agreement that
4 you've reached with the government about what sentence you
5 should receive, other than that agreement, are you pleading
6 guilty for any other reason other than because you are
7 guilty?

8 A No.

9 Q And do you think it's in your best interest to enter a
10 plea of guilty today?

11 A Yes.

12 THE COURT: Very well. I will defer accepting his
13 plea and entering a judgment of guilty until such time as
14 the Court of Appeals remands the case to me for the entry of
15 judgment. Anything other than coming back on the 18th of
16 January?

17 MR. TAYLOR: I think you have said on the record
18 that you accept the terms of the --

19 THE COURT: I do agree to the terms, but I can't
20 obviously accept his plea of guilty.

21 MR. TAYLOR: We will, we're comfortable
22 representing to the Court of Appeals that you have made that
23 determination as of now.

24 THE COURT: Right, you can make those
25 representations.

1 MR. TAYLOR: Thank you, your Honor.

2 THE COURT: Anything else?

3 MR. GILLICE: Yes, your Honor. With regard -- I
4 understand we've set the sentencing date for the 18th of
5 January at 2 p.m. The consent order of forfeiture, your
6 Honor, I think --

7 THE COURT: You're going to submit that tomorrow,
8 right?

9 MR. GILLICE: Correct. I would hand up a redacted
10 version or a version with the proposed redactions.

11 THE COURT: Just give it to my clerk.

12 MR. GILLICE: This is of the plea agreement that
13 was entered today such that that could be placed on the
14 public docket.

15 THE COURT: That's the redacted version?

16 MR. GILLICE: Yes, your Honor.

17 THE COURT: Then we'll actually give it to the
18 clerk then. I didn't know you wanted that a part of the
19 record.

20 MR. GILLICE: And so, your Honor, I guess we would
21 formally move to have that, the actual plea agreement
22 sealed. Published the redacted version on the record for
23 the reasons we discussed earlier.

24 THE COURT: I would do that, but I think it would
25 be prudent to submit something in writing to that effect.

1 MR. GILLICE: Very well.

2 THE COURT: Anything else?

3 MR. TAYLOR: No, your Honor, thank you.

4 THE COURT: If I don't see you beforehand have a
5 nice holiday.

6 [Thereupon, the proceedings adjourned at 4:09
7 p.m.]

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CERTIFICATE

I, Cathryn J. Jones, an Official Court Reporter for the United States District Court of the District of Columbia, do hereby certify that I reported, by machine shorthand, the proceedings had and testimony adduced in the above case.

I further certify that the foregoing 58 pages constitute the official transcript of said proceedings as transcribed from my machine shorthand notes.

In witness whereof, I have hereto subscribed my name, this the 13th day of December, 2018.

/s/_Cathryn J. Jones
Cathryn J. Jones, RPR
Official Court Reporter

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