



**U.S. Department of Justice**

*United States Attorney  
Southern District of New York*

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The Silvio J. Mollo Building  
One Saint Andrew's Plaza  
New York, New York 10007

November 7, 2016

**SUBMITTED BY ECF AND HAND**

The Honorable Richard M. Berman  
United States District Court Judge  
Daniel Patrick Moynihan Courthouse  
500 Pearl Street  
New York, New York 10007

**Re: *United States v. Reza Zarab, a/k/a "Riza Sarraf," et al.*  
S2 15 Cr. 867 (RMB)**

Dear Judge Berman:

The Government writes to notify the Court that the grand jury has today returned a second superseding indictment (the "Indictment") in this case. A copy of the Indictment, docketed as S2 15 Cr. 867, is attached to this letter. The Indictment charges Mohammad Zarab, a/k/a "Can Sarraf," a/k/a "Kartalsmd," with using the U.S. financial system to conduct transactions on behalf of the Government of Iran and other Iranian entities, which were barred by United States sanctions; laundering funds in connection with those illegal transactions; and defrauding several financial institutions by concealing the true nature of these transactions. The Indictment further alleges that the three defendants previously charged with the same offenses in the two preceding indictments in this case—Reza Zarab, Camelia Jamshidy, and Hossein Najafzadeh—participated in financial transactions for the benefit of Mahan Air, an Iranian airline sanctioned for providing services for the Iranian Qods Force and Hizballah.

The Government respectfully requests that the Court schedule an arraignment for the defendant Reza Zarab on the new Indictment at the Court's earliest convenience. All of the discovery pertaining to the new overt acts alleged in the Indictment has previously been produced to the defendant, so the Government does not believe that any change to the previously-set schedule in this case will be required.

Respectfully submitted,

PREET BHARARA  
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Cc: All counsel of record (via ECF)