

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

UNITED STATES OF AMERICA	:	Crim No.: 22-cr-133 (CKK)
	:	
	:	
v.	:	VIOLATIONS:
	:	
ARIAN TAHERZADEH	:	18 U.S.C. § 371
	:	(Conspiracy)
	:	
Defendant.	:	7 D.C. Code § 2506.01(b)
	:	(Unlawful Possession of a Large Capacity
	:	Ammunition Feeding Device)
	:	
	:	22 D.C. Code 3531
	:	(Voyeurism)

SUPERSEDING INFORMATION

The United States Attorney for the District of Columbia charges that:

GENERAL ALLEGATIONS

At all times material to this Information, on or about the times stated below:

Introduction

1. ARIAN TAHERZADEH was a 40-year-old resident of the District of Columbia.
2. United States Special Police LLC (USSP) was a Washington, D.C., limited liability company, with a registered address associated with a residence maintained and controlled by TAHERZADEH. TAHERZADEH was the beneficial owner of USSP.
3. On USSP's website, USSP was described as a private law enforcement, investigative, and protective service headquartered in Washington, D.C. The website stated that USSP can provide law enforcement, protective services, and investigative services within a contracted jurisdiction. TAHERZADEH and Haider Ali represented themselves to law enforcement and others as agents and investigators with USSP.

4. USSP was not associated or affiliated in any way with the United States Government, nor has it ever done business with the United States Government, or the District of Columbia including the United States Department of Homeland Security, and the District of Columbia Metropolitan Police Department (MPD).

5. TAHERZADEH and Ali were not, and have never been, employees of the United States Government or the District of Columbia.

6. The Crossing, Carver Apartments, and Sonnet were Apartment complexes in the District of Columbia. The Crossing was located at 949 First Street SE. Carver Apartments was located at 211 Elm Street NW, and Sonnet was located at 1441 U Street NW.

COUNT ONE
(Conspiracy)

7. The allegations contained in paragraphs 1 through 6 are realleged as fully set forth herein.

8. Beginning as early as February 2020, and continuing as late as, April 6, 2022, in the District of Columbia and elsewhere, the defendant,

ARIAN TAHERZADEH,

with Haider Ali, and others known and unknown, did knowingly conspire, confederate, and agree together and with each other to:

(a) falsely assume and pretend to be officers and employees acting under the authority of the United States, and any department, agency and officer thereof, and acted as such, and in such pretended character demanded and obtained money, papers, documents and things of value; that is, TAHERZADEH falsely acted as if he was an authorized agent and employee of the Department of Homeland Security and other federal and District of Columbia agencies to recruit other individuals to fabricated law enforcement positions, and pretended to be an agent and

employee of the Department of Homeland Security and the D.C. Metropolitan Police Department to obtain things of value from The Crossing, Carver Apartments, and Sonnet apartment complexes, all in violation of 18 U.S.C. § 912; and

(b) devise and intend to devise a scheme to defraud and to obtain money and property by means of materially false and fraudulent pretenses, representations, and promises; that is, TAHERZADEH used a false affiliation with Department of Homeland Security and other federal and District of Columbia agencies to obtain things of value from The Crossing, Carver Apartments and Sonnet apartment complexes, all in violation of 18 U.S.C. § 1343.

Purpose of the Conspiracy

9. It was a purpose of the conspiracy for TAHERZADEH to ingratiate himself with members of federal law enforcement and the defense community.

10. It was another purpose of the conspiracy for TAHERZADEH to enrich himself by obtaining property by fraudulent pretenses including through a false affiliation with the federal law enforcement community.

Manner and Means

11. TAHERZADEH, Ali, and Subject 1, together with others known and unknown, carried out the conspiracy by the following manner and means, among others:

- a. self-identified as investigators, analysts, and agents with the USSP, and identified USSP as part of the United States Department of Homeland Security and affiliated with other federal and local law enforcement agencies;
- b. used a false affiliation with law enforcement to obtain leases as well as special access, benefits, and treatment for several luxury apartments in USSP's name;

- c. obtained paraphernalia with the insignias of and firearms, including handguns and assault rifles, used by federal law enforcement agencies;
- d. provided members of the United States Secret Service with, among other things, rent-free apartments, free garage parking spaces, iPhones, surveillance systems, a drone, a flat screen television, a computer monitor, gun safes for storing an assault rifle, a generator, and law enforcement paraphernalia; and
- e. offered to purchase and provide an assault rifle, valued at approximately \$2,000, to a USSS Special Agent assigned to the protective detail of the First Lady of the United States.

Overt Acts

12. TAHERZADEH, and Ali, together with others known and unknown, carried out the conspiracy via the following acts:

13. On November 20, 2020, USSP, Suspect 1, and TAHERZADEH, on behalf of USSP, executed a lease for three units at The Crossing. The lease was executed by USSP, using the name United States Special Police 1. USSP represented to The Crossing's agents that the company was acting under the authority of the MPD and federal law enforcement agencies, including, but not limited to, DHS and USSS. USSP received special access, benefits, and treatment due to their alleged affiliation with federal law enforcement.

14. In or about December 2020, Ali told the manager of the parking garage located at The Crossing that he needed five parking spots for government vehicles and that he was on a special assignment at the White House. The manager, who had been notified that United States Special Police Officers were to become residents of the complex, agreed to provide him with the parking spots with the understanding that the bill would be paid by the federal government.

15. By May 2021, USSP’s parking bill had not been paid. In May 2021, Ali contacted the parking manager in a three-way call with “Kevin Fuller,” who Ali introduced to be his direct supervisor at United States Special Police, but was in, fact, TAHERZADEH. TAHERZADEH, using the false name “Kevin Fuller” assured the manager that the payment for parking would soon be arriving. USSP never paid for the parking.

16. In May 2021, TAHERZADEH and Ali recruited a person to be “deputized” through Metropolitan Police Department (MPD) as a special police officer to assist TAHERZADEH and ALI in purported investigative work for the Department of Homeland Security. In May 2021, Ali provided the recruit with information and fee requirements for a shooting certification course. In furtherance of the recruitment efforts, Ali took the recruit to a firearms range in Upper Marlboro, Maryland to shoot a qualification course and receive a certificate.

17. On June 28, 2021, at the behest of TAHERZADEH, the recruit went to the MPD headquarters in Judiciary Square to be fingerprinted but was told that he did not have an appointment.

18. In July 2021, Ali accompanied the recruit to MPD headquarters so that the recruit could be fingerprinted. At the main check-in desk, Ali showed an MPD employee a fraudulent law enforcement badge and was able to bypass security and the recruit was fingerprinted without being screened.

(In violation of Title 18, United States Code, Section 371)

COUNT TWO
(Unlawful Possession of a Large Capacity Ammunition Feeding Device)

On April 6, 2022, within the District of Columbia,

ARIAN TAHERZADEH

did possess a large capacity ammunition feeding device—that is, five (5) Sig Sauer magazines.

(In Violation of D.C. Code § 7-2506.01(b))

COUNT THREE
(Voyeurism)

Between May 27, 2021, and May 30, 2021, within the District of Columbia,

ARIAN TAHERZADH

did unlawfully electronically record, without the express and informed consent of A.B., A.B., who was engaging in sexual activity.

(In Violation of D.C. Code § 22-3531(c)(1)(C))

A TRUE BILL:

FOREPERSON



ATTORNEY FOR THE UNITED STATES
IN AND FOR THE DISTRICT OF COLUMBIA