

**FILED**

May 24 2022

CLERK, U.S. DISTRICT COURT  
SOUTHERN DISTRICT OF CALIFORNIA  
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**SEALED**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF CALIFORNIA

July 2021 Grand Jury

UNITED STATES OF AMERICA,

Plaintiff,

v.

KARIM ARABI (1),  
SHEIDA ALAN (2),  
aka Sheida Arabi,  
SANJIV TANEJA (3),  
ALI AKBAR SHOKOUHI (4),

Defendants.

Case No. '22 CR1152 W

I N D I C T M E N TTitle 18, U.S.C., Sec. 1349 -  
Wire Fraud Conspiracy; Title 18,  
U.S.C., Sec. 1343 - Wire Fraud;  
Title 18, U.S.C., Sec. 1956(h) -  
Conspiracy to Launder Monetary  
Instruments; Title 18, U.S.C.,  
Sec. 1957 - Engaging in Monetary  
Transactions in Property Derived  
From Specified Unlawful Activity;  
Title 18, U.S.C., Secs.  
981(a)(1)(C), 982(a)(1), and  
982(b), and Title 28, U.S.C., Sec.  
2461(c) - Criminal Forfeiture

The grand jury charges, at all relevant times:

Introductory Allegations

1. Defendant KARIM ARABI ("KARIM") was an engineer working in the technology industry and specializing in the "Design for Test" (or "DFT") field of the microchip sector. Defendant KARIM was employed by Victim Company as a Vice President of Engineering from 2007 to 2012 and as a Vice President of Research and Development from 2013 to 2016. As a Victim Company employee, defendant KARIM was bound by agreements

1 generally providing that intellectual property he created during his  
2 period of employment would belong to Victim Company.

3       2. Defendant SHEIDA ALAN, aka Sheida Arabi, ("SHEIDA") was  
4 KARIM's younger sister, residing in Vancouver, British Columbia, Canada.  
5 From 2014 to 2016, defendant SHEIDA pursued a master's degree at  
6 University 1 in British Columbia, Canada, where she studied under a  
7 professor (Individual 1) to whom defendant KARIM had introduced her. At  
8 all times material to this indictment, defendant SHEIDA's studies  
9 related to subjects generally relevant to inkjet printing and not to the  
10 DFT field.

11       3. Defendant SANJIV TANEJA was a technology executive whom  
12 defendant KARIM hand-picked to serve as Chief Executive Officer ("CEO")  
13 of Abreezio, LLC ("Abreezio"). Following Victim Company's acquisition  
14 of Abreezio, defendant TANEJA was briefly employed at Victim Company  
15 from approximately October 2015 to May 2016.

16       4. Defendant ALI AKBAR SHOKOUHI was an entrepreneur, investor,  
17 and business advisor. He was employed at Victim Company as a Vice  
18 President of Engineering from approximately 2011 to 2014. Defendant  
19 SHOKOUHI funded Abreezio's initial development through entities that  
20 defendant SHOKOUHI controlled, including Company 1 and Company 2.  
21 Defendant SHOKOUHI also arranged to provide clerical and financial  
22 services support to Abreezio through Company 1, whose staff provided  
23 financial services to Abreezio. Defendant SHOKOUHI also controlled  
24 Company 3, which provided additional support to Abreezio during its  
25 formation and development.

26       5. Abreezio was a newly-formed technology startup company based  
27 in Sunnyvale, California. Defendants KARIM, TANEJA, SHOKOUHI and others  
28 created Abreezio as a vehicle to commercialize new DFT technology

1 provisionally patented by defendant KARIM while he worked for Victim  
2 Company. Even though defendant KARIM was intimately involved in  
3 Abreezio's formation and development, defendant KARIM never disclosed  
4 his DFT technology or the patents to Victim Company, and indeed  
5 Abreezio's principals, including defendant TANEJA, concealed defendant  
6 KARIM's connections with Abreezio from Victim Company throughout the  
7 marketing and due diligence processes leading to Abreezio's sale to  
8 Victim Company.

9       6. Victim Company was a large multinational technology company  
10 based in San Diego, California. Among other things, Victim Company  
11 specialized in microchip design, testing, and optimization, and  
12 therefore stood to benefit substantially from incremental improvements  
13 in the DFT field.

14       7. Company 1 was a technology services company controlled by  
15 defendant SHOKOUHI and others, based in San Diego, California.

16       8. Company 2 was a technology investment company controlled by  
17 defendant SHOKOUHI and others, based in San Diego, California.

18       9. Company 3 was a technology staffing and services company  
19 controlled by defendant SHOKOUHI and others, based in San Diego,  
20 California.

21       10. Company 4 was a Canadian technology services company, based  
22 in British Columbia, Canada. Company 4 was controlled by Individual 2,  
23 who was defendant KARIM's former colleague.

24       11. On October 30, 2015, Victim Company finalized a deal to  
25 purchase Abreezio and its DFT technology for approximately \$150 million.  
26 As part of the purchase price, Victim Company paid over \$91 million to  
27 defendant SHEIDA, over \$10 million to defendant TANEJA, and over \$24  
28

1 million combined to Company 2 and Company 3, which were controlled by  
2 defendant SHOKOUHI.

3 Count 1

4 Wire Fraud Conspiracy

5 18 U.S.C. § 1349

6 [All Defendants]

7 12. The foregoing paragraphs are hereby incorporated by reference  
8 as if fully stated herein.

9 13. Beginning no later than October 2014, and continuing up to at  
10 least June 2018, within the Southern District of California and  
11 elsewhere, defendants KARIM ARABI ("KARIM"), SHEIDA ALAN, aka Sheida  
12 Arabi, ("SHEIDA"), SANJIV TANEJA, and ALI AKBAR SHOKOUHI knowingly and  
13 intentionally conspired with each other and others known and unknown to  
14 the grand jury, to commit wire fraud, that is to knowingly devise a  
15 material scheme and artifice to defraud and to obtain money and property  
16 by means of materially false and fraudulent pretenses, representations,  
17 and promises, and by intentional concealment and omission of material  
18 facts, and in executing said scheme, caused writings, signs, signals,  
19 and sounds to be transmitted by means of wire in interstate commerce;  
20 in violation of Title 18, United States Code, Section 1343.

21 14. It was the purpose of the conspiracy that defendants KARIM,  
22 SHEIDA, TANEJA, and SHOKOUHI would and did fraudulently obtain tens of  
23 millions of dollars from Victim Company by selling it valuable DFT  
24 technology nominally owned by new technology start-up Abreezio, LLC  
25 ("Abreezio") while concealing from Victim Company that the technology  
26 had been provisionally patented by defendant KARIM, and originally  
27 developed by and in close association with defendant KARIM, who was then  
28 a Victim Company employee, and also to conceal from Victim Company the



1 role of defendant SHOKOUHI and one of defendant SHOKOUHI's companies  
2 (Company 1) in Abreezio's funding and development.

3 15. To execute the scheme, defendants KARIM, SHEIDA, TANEJA, and  
4 SHOKOUHI used the following manner and means, among others:

5 a. It was a part of the conspiracy that defendant KARIM  
6 would and did file and cause to be filed provisional patents for  
7 Abreezio's core DFT technology, falsely listing defendant SHEIDA as its  
8 true inventor while concealing his own primary role;

9 b. It was a further part of the conspiracy that defendant  
10 SHEIDA would and did attempt to assist defendant KARIM in the patent  
11 filing process, despite knowing that she had no real connection to the  
12 technology being patented as her supposed invention;

13 c. It was a further part of the conspiracy that defendants  
14 KARIM and TANEJA would and did create, and defendant KARIM would and did  
15 use, multiple email accounts containing defendant SHEIDA's name so that  
16 defendant KARIM could impersonate defendant SHEIDA and send emails  
17 purporting to be her;

18 d. It was a further part of the conspiracy that defendant  
19 TANEJA would and did send deceptive emails nominally to defendant SHEIDA  
20 but in truth to email accounts controlled and used by defendant KARIM,  
21 as defendant TANEJA well knew, to make it appear that defendant SHEIDA  
22 was an active participant in Abreezio's formation and development;

23 e. It was a further part of the conspiracy that defendant  
24 KARIM would respond to these emails, signing email messages as defendant  
25 SHEIDA and occasionally forwarding documents supposedly signed by  
26 defendant SHEIDA, all in an effort to falsely portray defendant SHEIDA  
27 as an active participant in Abreezio's formation and development;

1 f. It was a further part of the conspiracy that defendant  
2 KARIM would and did plan with his former colleague, Individual 2, to use  
3 a third-party holding company (later transitioned to Abreezio) as a  
4 vehicle for the intellectual property rights to defendant KARIM's new  
5 DFT technology, specifically in order to market it to Victim Company;

6 g. It was a further part of the conspiracy that defendant  
7 KARIM would and did engage Individual 2's technology development company  
8 (Company 4) to further refine and monetize the DFT technology before  
9 marketing it to Victim Company, and would select Individual 2 to serve  
10 as Abreezio's Chief Technology Officer;

11 h. It was a further part of the conspiracy that defendant  
12 KARIM would and did plan with Individual 2 to put Individual 1, defendant  
13 SHEIDA's advisor and professor at University 1, on Abreezio's board of  
14 directors to lend it credibility as a legitimate independent firm;

15 i. It was a further part of the conspiracy that defendant  
16 KARIM would and did select Abreezio's business name and recruit and  
17 retain defendant TANEJA as Abreezio's CEO, while planning with defendant  
18 TANEJA to hide defendant KARIM's role in Abreezio from Victim Company  
19 and falsely portray to Victim Company that Abreezio's core technology  
20 was defendant SHEIDA's invention;

21 j. It was a further part of the conspiracy that defendants  
22 TANEJA, SHOKOUHI and KARIM, and others, would and did attend regular  
23 operations meetings to discuss the formation and development of Abreezio  
24 without involving defendant SHEIDA in any way;

25 k. It was a further part of the conspiracy that defendants  
26 TANEJA, SHOKOUHI and KARIM would and did regularly refer to defendant  
27 KARIM as "Sheida" in connection with planning meetings and calls in  
28 order to mask defendant KARIM's role in the formation and development

1 of Abreezio, and to falsely portray defendant SHEIDA as involved in that  
2 process;

3           1. It was a further part of the conspiracy that defendant  
4 KARIM would and did provide defendant TANEJA with sensitive internal  
5 information about Victim Company's existing DFT technology, which  
6 Abreezio's DFT technology would replace or supplant, in order to fine-  
7 tune Abreezio's marketing pitch;

8           m. It was a further part of the conspiracy that defendant  
9 KARIM would and did provide feedback to defendant TANEJA about Abreezio's  
10 marketing materials and about specific persons at Victim Company to  
11 contact as part of Abreezio's pitch, writing from an email account  
12 purportedly used by defendant SHEIDA and which defendant KARIM in truth  
13 used to impersonate her;

14           n. It was a further part of the conspiracy that defendant  
15 SHOKOUHI would and did provide seed funding and staff support to Abreezio  
16 from other companies that defendant SHOKOUHI controlled, including  
17 Company 1, Company 2, and Company 3;

18           o. It was a further part of the conspiracy that defendants  
19 SHOKOUHI, TANEJA and KARIM, and others, would and did conceal or minimize  
20 the role of both defendant SHOKOUHI and Company 1 in Abreezio's formation  
21 and development to avoid scrutiny from Victim Company's due diligence  
22 staff, in part because Victim Company had flagged conflict of interest  
23 issues with defendant SHOKOUHI and Company 1 roughly a year earlier; for  
24 example, Company 1 would route its funding through Company 2 to obscure  
25 Company 1's involvement in Abreezio;

26           p. It was a further part of the conspiracy that defendant  
27 SHEIDA would and did legally change her name from "Sheida Arabi" to  
28



1 "Sheida Alan" as part of the scheme in order to further mask her  
2 connection with defendant KARIM;

3 q. It was a further part of the conspiracy that defendant  
4 KARIM would and did alter copies of patent documents to remove original  
5 references to "Sheida Arabi" and replace them with references to "Sheida  
6 Alan" following defendant SHEIDA's legal name change, all in an effort  
7 to further conceal defendant KARIM's connection to defendant SHEIDA and  
8 Abreezio;

9 r. It was a further part of the conspiracy that defendant  
10 TANEJA would and did prepare backdated patent assignment documents to  
11 make it appear that defendant SHEIDA had signed them months earlier, and  
12 would and did provide signed, backdated documents to Victim Company;

13 s. It was a further part of the conspiracy that defendants  
14 TANEJA, SHOKOUHI, and KARIM would and did coordinate responses to  
15 questions asked during Victim Company's due diligence inquiries to hide  
16 the role of defendant KARIM, defendant SHOKOUHI and Company 1 in  
17 Abreezio's formation, funding and development;

18 t. It was a further part of the conspiracy that defendant  
19 SHEIDA would and did sign a notarized patent assignment agreement for  
20 the patent to Abreezio's core technology, knowing that she had no real  
21 connection to the technology being represented as her supposed  
22 invention;

23 u. It was a further part of the conspiracy that defendants  
24 TANEJA, SHEIDA, and others would and did misrepresent to Victim Company  
25 in documents for its purchase of Abreezio that Abreezio was the sole and  
26 exclusive owner of its technology, and that everyone involved in the  
27 creation and development of Abreezio's intellectual property had been  
28 truthfully disclosed, all while knowing and concealing that defendant

1 KARIM was intimately involved in that process, which would have allowed  
2 Victim Company to assert its own claim to Abreezio's intellectual  
3 property, had it known the truth;

4 v. It was a further part of the conspiracy that defendants  
5 SHEIDA and KARIM would and did cause the preparation and submission of  
6 false and misleading discovery responses in civil litigation brought  
7 against them by Victim Company following the Abreezio sale; and

8 w. It was a further part of the conspiracy that defendants  
9 KARIM and SHEIDA would and did prepare and cause to be prepared a  
10 falsified handwritten notebook purportedly documenting SHEIDA's  
11 contemporaneous research notes concerning DFT technology, and cause  
12 copies of the notebook to be produced in discovery in civil litigation  
13 brought by Victim Company.

14 16. In further of this scheme, defendants KARIM, SHEIDA, TANEJA,  
15 and SHOKOUHI committed the following overt acts, among others:

16 a. On or about October 20, 2014, defendant KARIM's former  
17 colleague, Individual 2, emailed defendant KARIM to discuss their joint  
18 plan to use a dormant outside company (the "Holding Company") to develop  
19 defendant KARIM's technology and market it to "large semiconductor  
20 companies like [Victim Company]"; according to the email, part of the  
21 arrangement would involve making defendant KARIM or one of his family  
22 members significant shareholders in the Holding Company;

23 b. On or about December 2, 2014, Individual 2 emailed  
24 defendant KARIM to discuss the corporate structure of the Holding  
25 Company; Individual 2 emphasized the need to think about "the appearance  
26 of control from an investor/acquirer due diligence point of view," adding  
27 that "[an] independent investor, with [] even a small i[n]vestment, who  
28 could take a board role, would be very helpful" for this purpose;



1 c. On or about December 9, 2014, defendant KARIM emailed  
2 Individual 2 and suggested Individual 1 for a board seat on the Holding  
3 Company, adding that Individual 1 was supervising defendant SHEIDA in  
4 her graduate studies; in response, Individual 2 cautioned defendant  
5 KARIM against having defendant SHEIDA work on related technology at  
6 University 1 because University 1 might try to assert intellectual  
7 property rights in SHEIDA's work;

8 d. On or about December 15, 2014, using a San Diego-based  
9 IP address, defendant KARIM caused to be submitted an "Info Sheet" for  
10 a provisional patent for technology related to the DFT field listing  
11 "Sheida Arabi" as the purported sole inventor and main contact, but  
12 bearing defendant KARIM's personal email address and defendant KARIM's  
13 telephone number as defendant SHEIDA's contact information;

14 e. On or about December 17, 2014, defendant KARIM created a  
15 Google email account ("sheida.arabi1@gmail.com") for the purpose of  
16 impersonating defendant SHEIDA (the "First SHEIDA Sham Account");  
17 defendant KARIM created the First SHEIDA Sham Account from the same San  
18 Diego-based IP address that he had used to submit the "Info Sheet" for  
19 the provisional patent on December 15, 2014;

20 f. In approximately December 2014, using one of her personal  
21 email accounts, defendant SHEIDA forwarded to defendant KARIM several  
22 emails associated with the provisional patent registration process,  
23 seeking defendant KARIM's guidance to facilitate the filings under  
24 defendant SHEIDA's name even though she had no real connection to the  
25 technology being patented as her supposed invention; in one email,  
26 defendant SHEIDA wrote to defendant KARIM, "What I need to send ??? I  
27 don not [sic] have any idea";  
28

1 g. On or about December 22, 2014, defendant KARIM caused to  
2 be filed a provisional patent application for DFT technology with the  
3 U.S. Patent and Trademark Office ("USPTO"); the application identified  
4 "Sheida Arabi" as the inventor, applicant, and filer, and provided the  
5 First SHEIDA Sham Account as defendant SHEIDA's supposed email contact;

6 h. On or about December 28, 2014, defendant KARIM caused to  
7 be filed a second provisional patent application for related DFT  
8 technology to the USPTO, identifying "Sheida Arabi" as the inventor, and  
9 providing the First SHEIDA Sham Account as defendant SHEIDA's supposed  
10 email contact;

11 i. On or about January 21, 2015, defendant KARIM emailed  
12 Individual 2 to inform him that defendant KARIM was close to finalizing  
13 an agreement with defendant TANEJA for defendant TANEJA to serve as CEO  
14 of the Holding Company;

15 j. On or about January 23, 2015, defendant SHOKOUHI emailed  
16 defendants KARIM and TANEJA to invite them and Individual 2 to an  
17 operations meeting to discuss the formation and organization of the  
18 Holding Company, including plans to engage with Victim Company (and  
19 other customers); defendant KARIM replied to confirm the time for the  
20 first telephone meeting, copying Individual 2 at defendant SHOKOUHI's  
21 request; defendant SHEIDA was not invited or even copied on either  
22 message;

23 k. On or about January 29, 2015, defendant KARIM emailed  
24 defendants TANEJA and SHOKOUHI and Individual 2 to suggest a series of  
25 names for the Holding Company, including Abreezio, which was eventually  
26 selected; defendant SHEIDA was not copied;

27 l. On or about February 3, 2015, after arranging to set up  
28 Abreezio email accounts for himself, defendant SHOKOUHI, and

1 Individual 2, defendant TANEJA texted defendant KARIM that he was  
2 "[a]ssuming you will continue to use your Hotmail (better for O  
3 reasons)," clarifying a moment later "O - optics";

4 m. On or about February 3, 2015, defendant TANEJA arranged  
5 to set up an Abreezio email account nominally for defendant SHEIDA  
6 ("sheida@abreezio.com") (the "SHEIDA Abreezio Account") but sent the  
7 activation instructions to the First SHEIDA Sham Account and texted  
8 defendant KARIM to alert him that defendant TANEJA was setting up an  
9 account "for your sister";

10 n. Shortly thereafter, on or about February 3, 2015,  
11 defendant KARIM texted defendant TANEJA "Just activated the google  
12 account. It shows Verification in progress";

13 o. On or about February 24, 2015, defendant TANEJA emailed  
14 Individual 3, who was then a high-level employee at Victim Company and  
15 was in fact defendant KARIM's former supervisor, to introduce Abreezio;  
16 defendant TANEJA described Abreezio as "an angel-funded Silicon Valley  
17 based design IP start-up" and requested a meeting to showcase its  
18 "groundbreaking technology";

19 p. On or about February 25, 2015, defendant TANEJA texted  
20 defendant KARIM asking for help to prepare the "quantifiable benefit"  
21 portion of Abreezio's presentation to Victim Company; specifically,  
22 defendant TANEJA asked defendant KARIM for the "numbers" for the  
23 comparable technology that Victim Company was then using, so that the  
24 Abreezio team would know "the 'threshold' we need to cross at [Victim  
25 Company]" which would "help us calibrate our positioning going in";

26 q. On or about March 3, 2015, defendant KARIM provided  
27 feedback on Abreezio marketing material circulated by defendant TANEJA,  
28 using the First SHEIDA Sham Account;



1           r. On or about March 4, 2015, defendant TANEJA and  
2 Individual 2 made a formal pitch on behalf of Abreezio to Victim Company  
3 staff;

4           s. On or about March 11 and March 13, 2015, defendant TANEJA  
5 emailed copies of Abreezio's operating agreement to the First SHEIDA  
6 Sham Account and the SHEIDA Abreezio Account; on or about March 13,  
7 2015, defendant TANEJA texted defendant KARIM "couple of updates in  
8 Inbox. Thanks!";

9           t. On or about March 12, 2015; September 21, 2015;  
10 October 5, 2015; and October 13, 2015, defendant SHOKOUHI caused  
11 Company 1 to provide hundreds of thousands of dollars of funding to  
12 Abreezio, in each case funneling the money through Company 2 to obscure  
13 its true source from Company 1;

14           u. On or about March 20, 2015, defendant TANEJA made another  
15 formal pitch on behalf of Abreezio to Victim Company staff, including  
16 Individual 3 (KARIM's former supervisor); later that evening, defendant  
17 TANEJA texted defendant KARIM "Thanks again to your technical prowess  
18 'genius,' creative innovation and guidance, we made [a] great impression  
19 yesterday!"; to keep up the false appearance that Abreezio's technology  
20 was really invented by defendant SHEIDA, defendant KARIM responded,  
21 "Thanks Sanjiv! I am quite proud of my sister and what she has  
22 accomplished.";

23           v. On or about May 27, 2015, defendant TANEJA emailed  
24 defendant SHOKOUHI, Individual 2, and the SHEIDA Abreezio Account with  
25 subject "call-in number for our 5pm call" and dial-in information for a  
26 conference call; the SHEIDA Abreezio Account replied "Will call in a few  
27 minutes"; at 5:12 p.m., defendant KARIM called the dial-in number listed  
28

1 in defendant TANEJA's email from defendant KARIM's personal telephone  
2 number;

3 w. On or about July 15, 2015, defendant SHEIDA legally  
4 changed her name from "Sheida Arabi" to "Sheida Alan" with British  
5 Columbia authorities in Canada, in part to further enable Abreezio and  
6 its principals to disguise from Victim Company any connection between  
7 Abreezio and defendant KARIM;

8 x. On or about September 19, 2015, defendant KARIM created  
9 a second Google account ("sheida.alan@gmail.com") for the purpose of  
10 impersonating SHEIDA (the "Second SHEIDA Sham Account") and to avoid use  
11 of SHEIDA's original surname "Arabi" in order to further distance  
12 defendant KARIM from Abreezio; defendant KARIM created the Second SHEIDA  
13 Sham Account from the same San Diego-based IP address that he had used  
14 to create the First SHEIDA Sham Account on December 17, 2014, and to  
15 submit the "Info Sheet" for the provisional patent on December 15, 2014;

16 y. On or about September 21, 2015, the Second SHEIDA Sham  
17 Account emailed defendant TANEJA altered versions of the provisional  
18 patent applications that defendant KARIM had submitted in December 2014,  
19 which had been doctored to remove a reference to "Sheida Arabi" and  
20 replace it with "Sheida Alan," and to remove the reference to the First  
21 SHEIDA Sham Account and replace it with the Second SHEIDA Sham Account;

22 z. On or about September 23, 2015, defendant TANEJA emailed  
23 defendant SHOKOUHI to suggest creating an Abreezio email account for  
24 Individual 4, a key employee of Company 1 who had been providing  
25 financial support to Abreezio; in order to continue to conceal  
26 Company 1's role in Abreezio's development, defendant SHOKOUHI emailed  
27 that "We can't use [Individual 4's] name since [Victim Company] knows  
28



1 she works for [Company 1]. She talk[s] to [Victim Company] on regular  
2 bas[i]s";

3           aa. On or about September 24, 2015, defendant TANEJA emailed  
4 the Second SHEIDA Sham Account to ask "Sheida" to sign a patent  
5 assignment agreement which had been backdated to February 17, 2015, over  
6 the name "Sheida Alan"; later that evening, the Second SHEIDA Sham  
7 Account responded, attaching a backdated signed patent assignment  
8 agreement bearing the signature "Sheida" (with no last name) over the  
9 typed signature line "Sheida Alan";

10           bb. On or about October 19, 2015, in response to a question  
11 from Victim Company's due diligence staff about Company 2's ownership  
12 and its connections to Abreezio's management or staff, defendant TANEJA  
13 replied (after consultation with the Second SHEIDA Sham Account) that  
14 Company 2 was "a bunch of private money including [an Abreezio board  
15 member] and his friends from [other named companies]," assuring Victim  
16 Company that there was no connection between Company 2 and any of  
17 Abreezio's employees or management; in the email, defendant TANEJA did  
18 not mention any connection between Company 2 and either defendant  
19 SHOKOUHI or Company 1;

20           cc. On or about October 26, 2015, defendant SHEIDA signed a  
21 notarized patent assignment agreement concerning the Abreezio DFT  
22 technology patents in Burnaby, British Columbia, Canada, using the name  
23 "Sheida Alan";

24           dd. On or about October 26, 2015, the Second SHEIDA Sham  
25 Account sent a fictitious resumé for defendant SHEIDA to defendant  
26 TANEJA, which contained numerous false statements about defendant  
27 SHEIDA's qualifications, including invented work and academic history  
28 both relevant to DFT technology; in the cover email for the fictitious

1 resumé, "Sheida" further stated that she had not signed any assignments  
2 of intellectual property rights with University 1 as part of her graduate  
3 work;

4 ee. On or about October 30, 2015, defendants TANEJA and SHEIDA  
5 and others signed a Unit Purchase Agreement for Victim Company's purchase  
6 of Abreezio, in which they falsely represented that they had made no  
7 intentional misrepresentations in connection with the relevant patent  
8 applications, and that Abreezio had not misrepresented or failed to  
9 disclose any facts in any application that would constitute fraud or an  
10 intentional misrepresentation with respect to such an application;  
11 defendants TANEJA and SHEIDA and others also represented in the agreement  
12 that they had truthfully disclosed everyone involved in the conception,  
13 creation, and development of Abreezio's intellectual property, even  
14 though nowhere in the process did anyone disclose defendant KARIM's  
15 involvement;

16 ff. On or about October 30, 2015, defendants KARIM, SHEIDA,  
17 TANEJA and SHOKOUHI caused Victim Company to issue a combination of wire  
18 transfers totaling over \$150 million (USD) to themselves, their  
19 associates, and entities that they controlled, in exchange for Victim  
20 Company's purchase of Abreezio;

21 gg. On or about November 1, 2015, in a further effort to  
22 create a fake paper trail substantiating defendant SHEIDA's involvement  
23 in Abreezio, defendant TANEJA emailed the Second SHEIDA Sham Account,  
24 thanking "Sheida" for her "breakthrough technology contributions" and  
25 volunteering to "look you up if my future travels bring me to BC/Canada";

26 hh. On or about January 16, 2018, as part of civil litigation  
27 filed by Victim Company against defendants KARIM, SHEIDA, and TANEJA  
28 arising out of the Abreezio purchase, defendant KARIM caused to be served

1 on counsel for Victim Company responses to interrogatories which  
2 included, in response to the question "Describe your role in the  
3 formation, operation, and sale of Abreezio LLC," the false and misleading  
4 statements "Mr. Arabi introduced his sister Sheida Alan to his long-  
5 time acquaintance Sanjiv Taneja, which introduction ultimately led to  
6 the formation of Abreezio, LLC. However, Mr. Arabi otherwise had no role  
7 in the formation, operation or sale of Abreezio, LLC."; and

8 ii. On or about June 22, 2018, defendants KARIM and SHEIDA  
9 caused to be produced in civil litigation a copy of a notebook supposedly  
10 prepared by defendant SHEIDA and bearing internal dates from  
11 September 17, 2012 to December 27, 2013, although in truth many of the  
12 notes in the notebook were copied verbatim without attribution from  
13 sources published long after the dates reflected in the notebook.

14 All in violation of Title 18, United States Code, Section 1349.

15 **Counts 2-5**

16 **Wire Fraud**

17 **18 U.S.C. § 1343**

18 17. Paragraphs 1 through 11 are hereby incorporated by reference  
19 as if fully stated herein.

20 18. Beginning no later than October 2014, and continuing up to and  
21 including June 22, 2018, within the Southern District of California and  
22 elsewhere, defendants KARIM ARABI ("KARIM"), SHEIDA ALAN, aka Sheida  
23 Arabi, ("SHEIDA"), SANJIV TANEJA, and ALI AKBAR SHOKOUHI did knowingly,  
24 with the intent to defraud, devise a material scheme and artifice to  
25 defraud and for obtaining money and property by means of materially  
26 false and fraudulent pretenses, representations, and promises, and  
27 intentional concealment and omission of material facts.



19. As part of the scheme to defraud, defendants KARIM, SHEIDA, TANEJA, and SHOKOUHI utilized the Manner and Means described in paragraphs 13 through 16 above, which are hereby realleged and incorporated by reference as if fully stated herein.

#### Execution of Scheme by Wire Communications

20. On or about October 30, 2015, within the Southern District of California and elsewhere, defendants KARIM ARABI ("KARIM"), SHEIDA ALAN, aka Sheida Arabi, ("SHEIDA"), SANJIV TANEJA, and ALI AKBAR SHOKOUHI, for the purpose of executing the aforesaid scheme and artifice to defraud, did transmit and cause to be transmitted by wire communications in interstate and foreign commerce, certain writings, signs, signals, and sounds in the form of transfers of money as more particularly described below:

Count	Defendant	Sending Bank	Recipient/ Receiving Bank	Approx. Amount (USD)
2	KARIM & SHEIDA	Bank of America	Canadian Imperial Bank of Commerce	\$91,854,370.93
3	SHOKOUHI	Bank of America	Bank of America Beneficiary: Company 2	\$14,352,245.46
4	TANEJA	Bank of America	Bank of America	\$10,046,571.82
5	SHOKOUHI	Bank of America	Bank of America Beneficiary: Company 3	\$10,046,571.82

All in violation of Title 18, United States Code, Sections 1343 and 2, and *Pinkerton v. United States*, 328 U.S. 640 (1946).

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Count 6

Conspiracy to Launder Monetary Instruments

18 U.S.C. § 1956(h)

[KARIM & SHEIDA]

21. Paragraphs 1 through 11 are hereby incorporated by reference as if fully stated herein.

22. Beginning on a date unknown to the grand jury but no later than August 21, 2015, and continuing up to and including at least April 1, 2021, in the Southern District of California and elsewhere, defendants KARIM ARABI ("KARIM"), and SHEIDA ALAN, aka Sheida Arabi, ("SHEIDA") did knowingly conspire together and with others known and unknown to the grand jury to commit offenses against the United States in violation of Title 18, United States Code, Sections 1956 and 1957, to wit:

a. to knowingly conduct and attempt to conduct financial transactions affecting interstate and foreign commerce, which involved the proceeds of specified unlawful activity, that is, wire fraud, knowing that the transactions were designed in whole or in part to conceal and disguise the nature, location, source, ownership, and control of the proceeds of specified unlawful activity, and that while conducting and attempting to conduct such financial transactions, knew that the property involved in the financial transactions represented the proceeds of some form of unlawful activity, in violation of Title 18, United States Code, Section 1956(a)(1)(B)(i); and

b. to knowingly engage and attempt to engage in monetary transactions, by, through and to a financial institution, affecting interstate and foreign commerce, in criminally derived property of a value greater than \$10,000, such property having been derived from a



1 specified unlawful activity, that is, wire fraud; in violation of Title  
2 18, United States Code, Section 1957.

3 23. It was the purpose of the conspiracy for defendants KARIM and  
4 SHEIDA to launder the proceeds of wire fraud, and thereby enrich  
5 themselves and their associates.

6 24. To accomplish the objectives of the conspiracy, defendants  
7 KARIM and SHEIDA used the following manner and means, among others:

8 a. Defendant SHEIDA would and did open a dedicated bank  
9 account at Canadian Imperial Bank of Commerce ("CIBC") in the name  
10 "Sheida Alan" (the "Holding Account") to be used to receive over \$91  
11 million in wire fraud proceeds from Victim Company;

12 b. Defendant SHEIDA would and did receive approximately  
13 \$91,854,370.93 (USD) of wire fraud proceeds from Victim Company in the  
14 Holding Account;

15 c. Within less than three months, defendant SHEIDA would and  
16 did empty the Holding Account by transferring its entire balance to  
17 another CIBC account and closing the Holding Account the same day;

18 d. Defendant SHEIDA would and did form a Canadian real  
19 estate investment company, Avante North Ventures, Inc. ("Avante"), to  
20 further conceal and distribute the proceeds of wire fraud, including by  
21 investing them in valuable real estate in British Columbia;

22 e. Defendant SHEIDA would and did transfer \$4 million from  
23 Avante to a company controlled by defendant KARIM and later justify the  
24 transfer as a business-to-business loan under a supposed promissory note  
25 requiring no repayments for a period of up to five years;

26 f. Defendant SHEIDA would and did coordinate with defendant  
27 KARIM about the purchase, carrying, and disposition of real estate,  
28 including by email;

1 g. In consultation with defendant KARIM, defendant SHEIDA  
2 would and did purchase multiple parcels of Canadian real estate worth  
3 tens of millions of Canadian dollars;

4 h. In consultation with defendant KARIM, defendant SHEIDA  
5 would and did liquidate certain pieces of real property to provide  
6 partial repayment to Victim Company as part of defendants KARIM and  
7 SHEIDA's civil settlement with Victim Company from a civil lawsuit Victim  
8 Company filed against defendants KARIM and SHEIDA arising out of the  
9 Abreezio transaction.

10 All in violation of Title 18, United States Code, Section 1956(h).

11  
12 Count 7

13 Engaging in Monetary Transactions in Property Derived From

14 Specified Unlawful Activity

15 18 U.S.C. § 1957

16 [TANEJA]

17 25. Paragraphs 1 through 11 are hereby incorporated by reference  
18 as if fully stated herein.

19 26. On or about July 19, 2018, within the Southern District of  
20 California and elsewhere, defendant SANJIV TANEJA did knowingly engage  
21 in a monetary transaction by, through, and to a financial institution,  
22 affecting interstate and foreign commerce, in criminally derived  
23 property of a value greater than \$10,000.00, to wit: a wire transfer in  
24 the amount of \$1,550,679.70 sent from Ally Bank account ending in x8694  
25 to Ally Bank account ending in x4404, such property having been derived  
26 from specified unlawful activity, that is, wire fraud in violation of  
27 Title 18, United States Code, Section 1343, in which defendant TANEJA  
28

1 participated in the transfer of the proceeds from the Southern District  
2 of California to another district.

3 All in violation of Title 18, United States Code, Section 1957.

4 Count 8

5 Engaging in Monetary Transactions in Property Derived From  
6 Specified Unlawful Activity

7 18 U.S.C. § 1957

8 [SHOKOUHI]

9 27. Paragraphs 1 through 11 are hereby incorporated by reference  
10 as if fully stated herein.

11 28. On or about May 31, 2017, within the Southern District of  
12 California, defendant ALI AKBAR SHOKOUHI did knowingly engage in a  
13 monetary transaction by, through, and to a financial institution,  
14 affecting interstate and foreign commerce, in criminally derived  
15 property of a value greater than \$10,000.00 and which was derived from  
16 specified unlawful activity, that is, wire fraud in violation of Title  
17 18, United States Code, Section 1343, to wit: a sale of 10,000 shares  
18 of stock (stock symbol LXRK) held by E\*TRADE account ending in '0394 for  
19 \$136,008.08.

20 All in violation of Title 18, United States Code, Section 1957.

21 CRIMINAL FORFEITURE

22 29. The allegations contained in Counts 1 through 8 of this  
23 Indictment are hereby realleged and incorporated by reference for the  
24 purpose of alleging forfeiture to the United States pursuant to Title  
25 18, United States Code, Sections 981(a)(1)(C), 982(a)(1), and 982(b),  
26 and Title 28, United States Code, Section 2461(c).

27 30. Upon conviction of one and more of the offenses in violation  
28 of Title 18, United States Code, Sections 1349 and 1341 set forth in

1 Counts 1 through 5 of this Indictment, defendants KARIM ARABI ("KARIM"),  
2 SHEIDA ALAN, aka "Sheida Arabi," ("SHEIDA"), SANJIV TANEJA, and ALI  
3 AKBAR SHOKOUHI shall forfeit to the United States of America, pursuant  
4 to Title 18, United States Code, Section 981(a)(1)(C), and Title 28,  
5 United States Code, Section 2461(c), all property, real and personal,  
6 which constitutes or is derived from proceeds of the offenses and all  
7 property traceable to such property.

8 31. Upon conviction of the offense in violation of Title 18, United  
9 States Code, Section 1956(h) as set forth in Count 6 defendants KARIM  
10 ARABI ("KARIM") and SHEIDA ALAN, aka Sheida Arabi, ("SHEIDA") shall  
11 forfeit to the United States pursuant to Title 18, United States Code,  
12 Section 982(a)(1) all property involved in the offense. The property  
13 to be forfeited includes, but is not limited to: residential real  
14 property located at 1520 Vinson Creek Road, West Vancouver, British  
15 Columbia, Canada.

16 32. Upon conviction of the offense in violation of Title 18,  
17 United States Code, Section 1957 as set forth in Count 7 defendant SANJIV  
18 TANEJA shall forfeit to the United States pursuant to Title 18, United  
19 States Code, Section 982(a)(1) all property involved in the offense.

20 33. Upon conviction of the offense in violation of Title 18, United  
21 States Code, Section 1957 forth in Count 8 defendant ALI AKBAR SHOKOUHI  
22 shall forfeit to the United States pursuant to Title 18, United States  
23 Code, Section 982(a)(1) all property involved in the offense.

24 34. If any of the property described above, as a result of any act  
25 or omission of the defendants:

- 26 a. cannot be located upon the exercise of due diligence;
- 27 b. has been transferred or sold to, or deposited with, a  
28 third party;



1  
2 c. has been placed beyond the jurisdiction of the court;

3 d. has been substantially diminished in value; or

4 e. has been commingled with other property that cannot be  
5 divided without difficulty, the United States of America shall be  
6 entitled to forfeiture of substitute property pursuant to Title 18,  
7 United States Code, Section 982(b) and Title 28, United States Code,  
8 Section 2461(c).


9 All pursuant to Title 18, United States Code, Sections 981(a)(1)(C) and  
10 982(a)(2)(B), and Title 28, United States Code, Section 2461(c).

11 DATED: May 24, 2022.

12 A TRUE BILL:  
13  
14

15 RANDY S. GROSSMAN  
16 United States Attorney

17 By:

  
18 NICHOLAS W. PILCHAK  
19 MEGHAN E. HEESCH  
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