

Approved: Stephen A. Miller
STEPHEN A. MILLER
Assistant United States Attorney

Before: HONORABLE GABRIEL W. GORENSTEIN
United States Magistrate Judge
Southern District of New York

06 MAG 1187

UNITED STATES OF AMERICA : SEALED COMPLAINT
- v - : Violation of
: 18 U.S.C. § 371
: & 50 U.S.C. § 1705
JAVED IQBAL,
a/k/a "John Iqbal," :
Defendant. : COUNTY OF OFFENSE:
NEW YORK

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SOUTHERN DISTRICT OF NEW YORK, ss.:

CHARLES VILLANI, being duly sworn, deposes and says that he is an Investigator with the United States Attorney's Office, Southern District of New York, and charges as follows:

COUNT ONE
(Conspiracy to Violate the International
Emergency Economic Powers Act)

1. From at least in or about February 2006, up to and including at least in or about July 2006, in the Southern District of New York and elsewhere, JAVED IQBAL, a/k/a "John Iqbal," the defendant, and others known and unknown, unlawfully, willfully, and knowingly did combine, conspire, confederate, and agree together and with each other to commit offenses against the United States, to wit, to violate Section 1705(b) of Title 50, United States Code.

2. It was a part and an object of the conspiracy that JAVED IQBAL, a/k/a "John Iqbal," the defendant, a United States person, and others, unlawfully, willfully, and knowingly violated IEEPA, and the regulations promulgated thereunder, in violation of Section 1705(b) of Title 50, United States Code.

Overt Acts

3. In furtherance of the charged conspiracy and to effect the illegal object thereof, the following overt acts, among others, were committed in the Southern District of New York and elsewhere:

a. On or about January 19, 2005, JAVED IQBAL, a/k/a "John Iqbal," the defendant, obtained a license from the Federal Communication Commission that, among other things, permitted him to broadcast satellite television transmissions to customers.


b. On or about June 7, 2006, in a conversation with a confidential informant (the "CI") at the offices of HDTV Ltd. in Brooklyn, IQBAL offered to provide the CI with access to Al-Manar television broadcasts.

c. On or about July 14, 2006, IQBAL caused a contractor to install a satellite television system in an apartment in Manhattan for the purpose of, among other things, viewing Al-Manar satellite television broadcasts.

(Title 18, United States Code, Section 371.)


4. The bases for my knowledge and for the foregoing charges are, in part, set forth in the attached Affidavit in Support of Arrest and Search Warrants, which is incorporated by reference herein.

WHEREFORE, deponent prays that the above-named individual be arrested, and imprisoned or bailed, as the case may be.



CHARLES VILLANI
INVESTIGATOR
UNITED STATES ATTORNEY'S OFFICE
SOUTHERN DISTRICT OF NEW YORK

Sworn to before me this _____
th day of August, 2006. **AUG 22 2006**



UNITED STATES MAGISTRATE JUDGE
SOUTHERN DISTRICT OF NEW YORK

GABRIEL W. GORENSTEIN
UNITED STATES MAGISTRATE JUDGE
SOUTHERN DISTRICT OF NEW YORK