

COUNT ONE

CONSPIRACY TO VIOLATE THE INTERNATIONAL EMERGENCY ECONOMIC POWERS ACT

Count One forms the backbone of the false allegations. Obvious OFAC-style falsifications, manipulations, contradictions, and sickening repetition aim to confuse the reader and obstruct the facts. The US government used 19 pages to drum up the false and already defeated old Bout stories which had been tried and proven wrong in the courts in [Belgium](#) and [Thailand](#). ([See all original documents at Victor Bout website](#))

In an attempt to invent a case, at this time the United States government went way beyond the usual manipulation and falsification; **the US government lied about material facts, lied about events, and lied about dates**; thus [legally invalidating the indictment](#) which was built upon a collection of invented circumstances that were based on undisputable falsehood, misrepresentation of material facts, and perjury. *Here are some examples:*

If you pay attention to the underlined details in Paragraph-8 of the indictment you notice that all of the information there is lies. Chichakli was not among the individuals sanctioned by the UN on March 16, 2004. *Why the US government is lying about the date?* Because they wanted to invent a reason that should create an illusion of association between Chichakli and Samar Air which was created in 2004 as you see in [Paragraph 24](#) and [25](#) of the indictment.

Clear and undisputable evidence exposing the lies

Exposing the lies is simple and easy, here are some examples:

- Compare the date the US government falsified in [Paragraph-8](#) of the indictment to the actual day of sanctions appearing in the UN document for the travel ban and which was imposed on Richard Chichakli two years after the date mentioned in the indictment as seen in the UN report SC/8569
- Also compare the date the US government falsified in [Paragraph-9](#) of the indictment to the actual day of sanctions appearing in the UN document for the assets freeze and which was also imposed on Richard Chichakli at the request of the Bush regime two years after the date mentioned in the indictment as seen in the UN report SC/8570
- Look at the names of companies the US government falsely included in [Paragraph-9](#) of the indictment, none of these companies were listed in the alleged UN sanctions; worse than that, several of these companies did not even exist in 2004

US GOVERNMENT LIES FROM PAGE-8 OF THE INDICTMENT

8. On March 16, 2004, the United Nations Security Council Committee, pursuant to United Nations resolution 1521, approved a list of individuals subject to the travel restrictions imposed by that resolution. Both VIKTOR BOUT, a/k/a "Boris," a/k/a "Victor Anatoliyevich Bout," a/k/a "Victor But," a/k/a "Viktor Budd," a/k/a "Viktor Butt," a/k/a "Viktor Bulakin," a/k/a "Vadim Markovich Aminov" and RICHARD AMMAR CHICHAKLI, a/k/a "Robert Cunning," a/k/a "Raman Cedorov," the defendants, were among those individuals included on the travel ban list promulgated by the United Nations Security Council at that time.

UNDISPUTABLE FACTS FROM THE UN RECORDS

01/12/2005



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SECURITY COUNCIL COMMITTEE ON LIBERIA UPDATES TRAVEL BAN LIST

On 30 November 2005, the Security Council Committee established pursuant to resolution 1521 (2003) concerning Liberia decided to add the following two individuals to the list of persons subject to the travel restrictions imposed by paragraph 4 (a) of resolution 1521 (2003) and renewed by paragraph 1 (a) of resolution 1579 (2004) (the Travel Ban List):

CHICHAKLI, Richard Ammar

NAYDO, Valeriy

The revised list is reproduced in full below. Alternate spellings of names and alternate dates of birth are included in parenthesis. The latest version of the list can also be accessed on the Internet at the following URL:

[http:// www.un.org/Docs/sc/committees/Liberia3/1521_list.htm](http://www.un.org/Docs/sc/committees/Liberia3/1521_list.htm)

Reference: <http://www.un.org/News/Press/docs/2005/sc8569.doc.htm>

US GOVERNMENT LIES FROM PAGE-9 OF THE INDICTMENT

9. Shortly thereafter, on June 14, 2004, the United Nations Security Council Committee also placed VIKTOR BOUT, a/k/a "Boris," a/k/a "Victor Anatoliyevich Bout," a/k/a "Victor But," a/k/a "Viktor Budd," a/k/a "Viktor Butt," a/k/a "Viktor Bulakin," a/k/a "Vadim Markovich Aminov" and RICHARD AMMAR CHICHAKLI, a/k/a "Robert Cunning," a/k/a "Raman Cedorov," the defendants, on the asset freeze list that had been established as part of resolution

UNDISPUTABLE FACTS FROM THE UN RECORDS



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SECURITY COUNCIL COMMITTEE ON LIBERIA UPDATES ASSETS FREEZE LIST

On 30 November 2005, the Security Council Committee established pursuant to resolution 1521 (2003) concerning Liberia decided to add the following individual: individuals and entities subject to the measures imposed by paragraph 1 of resolution 1532 (2004) (the Assets Freeze List):

Individuals:

CHICHAKLI, Richard Ammar

NAYDO, Valeriy

Entities:

Abidjan Freight
Airbas Transportation FZE
Air Cess
Air Zory
ATC, Ltd.
Bukavu Aviation Transport
Business Air Services
Centrafican Airlines
Central African Development Fund
CET Aviation Enterprise (FZE)
Chichackli & Associates, PLLC
Continue Professional Education, Inc
Daytona Pools, Inc.
DHH Enterprises, Inc

IB of America Holdings, Inc.
Irbis Air Company
Moldtransavia, SRL
Nordic, Ltd.
Odessa Air
Orient Star Corporation
Richard A. Chichakli, P.C.
Rockman Ltd.
San Air General Trading FZE
Santa Cruz Imperial Airlines
Southbound, Ltd.
Trans Aviation Global Group, Inc.
Transavia Network
Vial Companv

Reference: <http://www.un.org/News/Press/docs/2005/sc8570.doc.htm>

The mumbo-jumbo of an absolutely unrelated data and events goes on for 20 pages before the indictment expresses the alleged crime in Paragraph 21 which reads:

21. Pursuant to Section 206 of IEEPA, Title 50, United States Code, Section 1705, a willful violation of "any license, order, or regulation" issued under IEEPA is a crime.

Now **here's the bottom-line and the answer to why the government lied about the dates** in particular. Of course the answer will also require another set of lies, and this time about an alleged creation of a company in Tajikistan in 2004 as seen in Paragraph-24 and 25

24. The United Nations and OFAC sanctions described above, imposed beginning in early 2004, exposed much of the network of companies owned and operated by VIKTOR BOUT, a/k/a "Boris," a/k/a "Victor Anatoliyevich Bout," a/k/a "Victor But," a/k/a "Viktor Budd," a/k/a "Viktor Butt," a/k/a "Viktor Bulakin," a/k/a "Vadim Markovich Aminov," the defendant, and made it difficult for both BOUT and RICHARD AMMAR CHICHAKLI, a/k/a "Robert Cunning," a/k/a "Raman Cedorov," the defendant, to do business within their existing corporate structure. Accordingly,

This is why the US Government lies and falsifies the dates: Chichakli was not sanctioned by the UN in 2004 as falsely stated in the indictment, nor OFAC sanctions were imposed early 2004 as also falsely stated, but in 2005 as you see below:



DEPARTMENT OF THE TREASURY
WASHINGTON, D.C. 20220

BLOCKING NOTICE

APR 22 2005

FAC No. LB-238092

Richard A. Chichakli
811 S. Central Expressway Ste 210
Richardson, TX 75080

Dear Mr. Chichakli:

You are hereby notified that you have been identified as a Specially Designated National ("SDN") effective April 26, 2005, at 8:00 a.m. EDT, pursuant to Executive

The indictment fabricated lies that are built upon falsehood and intentional deception and forgery. It is unreal that the government could go this low and could commit such crime in a further attempt to cover the previous crimes committed by the US government officials through unlawful persecution, perjury, theft, and attempted bribery. The US government went out of its way to cover up its previous lies and to protect its criminal officials; thus it failed, and shall always be known as a failed criminal regime regardless. The proof of its new criminal persecution against innocent cannot be better manifested than what is provided in the [examples](#) above.

As to the indictment, Paragraph-25 lays further lies and groundless assumptions as the government went on to invent a story about Richard having allegedly created a secret airline in Tajikistan in 2004, and for which he sent money from numerous companies, he also allegedly secretly created around the world; of course to counter the invented sanctions that supposedly existed since 2004 as falsely stated by the United States government. ***But, is it remotely possible this is just a mistake, an error rather than a deliberate crime and obstruction of justice? Not a chance,*** the US government stated the exact day the UN sanctions imposed to US Federal court in its previous testimony as seen below:

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35. On December 1, 2005, the United Nations Security Council Sanctions Committee on Liberia added Mr. Chichakli and his companies to the Liberia asset freeze list, thereby imposing an obligation on all U.N. Member States to take steps to freeze Mr. Chichakli's assets.

.....

I declare under penalty of perjury that the foregoing is true and correct.

Executed this 8th day of December, 2006.



ADAM J. SZUBIN
Director
Office of Foreign Assets Control
Department of the Treasury

Make no mistake about the indictment, the United States government deliberately and criminally lied collectively and individually about whatever stated in that defective indictment.