

**FILED**  
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Mark B. Busby  
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NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO

1 THOMAS A. COLTHURST (CABN 99493)  
Attorney for the United States  
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7 UNITED STATES DISTRICT COURT  
8 NORTHERN DISTRICT OF CALIFORNIA  
9 SAN FRANCISCO DIVISION

11 UNITED STATES OF AMERICA, ) CASE NO. CR23-00418VC  
12 Plaintiff, )  
13 v. ) VIOLATIONS:  
14 BAHMAN GHASSEMZADEH, ) 18 U.S.C. § 1349– Conspiracy to Commit Honest  
15 Defendant. ) Services Wire Fraud;  
16 ) 18 U.S.C. § 981(a)(1)(C) and 28 U.S.C. § 2461(c) –  
17 ) Criminal Forfeiture  
18 )  
19 ) SAN FRANCISCO VENUE  
20 )  
21 )  
22 )

19 I N F O R M A T I O N

20 The United States Attorney charges:

21 I n t r o d u c t o r y A l l e g a t i o n s

22 At times relevant to this Information:

23 1. Defendant BAHMAN GHASSEMZADEH is a civil engineer who, beginning in 2012,  
24 was employed at a San Francisco-based construction and building planning and design firm that drafted  
25 construction plans, advised on construction projects, and helped clients obtain approvals and permits for  
26 construction projects.

27 2. Co-conspirator SIAVASH TAHBAZOF founded and ran the planning and design firm.  
28 TAHBAZOF also owned and managed a separate construction company that oversaw construction of

INFORMATION

1 residential and commercial buildings in the San Francisco bay area.

2 3. Co-conspirator REZA KHOSHNEVISAN worked with TAHBAZOF, beginning in the  
3 late 1990s. In or around 2003, KHOSHNEVISAN entered into a partnership with TAHBAZOF where  
4 each owned 50 percent of the planning and design firm.

5 4. Co-conspirator RODOLFO PADA was a building plans engineer in the Plan Review  
6 Services department of the San Francisco Department of Building Inspection (“DBI”), employed at DBI  
7 from 1984 until on or about September 2017. PADA’s responsibilities included reviewing and  
8 approving building and construction plans submitted to DBI for approval

9 5. Co-conspirator CYRIL YU was a building plans engineer in the Plan Review Services  
10 department of DBI, employed there from on or about January 2014 until on or about February 2021.  
11 YU’s responsibilities included reviewing and approving building plans submitted to DBI for approval.

12 6. Co-Conspirator BERNARD CURRAN was a building inspector at DBI. He began at  
13 DBI in 2005, and in 2009, was promoted to Senior Building Inspector. CURRAN was employed at DBI  
14 until 2020. His duties included conducting physical inspections of buildings and construction sites in  
15 San Francisco and issuing approvals if the work had been properly completed.

16 7. DBI is a regulatory city agency in San Francisco responsible for overseeing enforcement  
17 of building, electrical, plumbing, and housing codes for the City of San Francisco’s more than 200,000  
18 commercial and residential buildings. Contractors and builders submit construction plans to DBI for  
19 approval and permitting. The plans are required to be inspected by a permit issuer before being  
20 approved to check and insure that the proposed construction meets city codes and regulations.

21 8. TAHBAZOF, KHOSHNEVISAN and GHASSEMZADEH regularly submitted building  
22 plans to DBI for building permits and inspection approvals.

23 The Honest Services Fraud Scheme

24 9. Beginning on a date unknown, but no later than January 2014, and continuing until on or  
25 about February 2021 in the Northern District of California and elsewhere, defendant  
26 GHASSEMZEDA, knowingly and with the intent to defraud, participated in, devised, and intended to  
27 devise a scheme and artifice to defraud the public of its right to the honest services of PADA, YU,  
28

1 CURRAN, and others, through the payment of bribes and kickbacks.

2 10. The objectives of the scheme to defraud were, among other objectives, to expedite  
3 approval of building permits and inspections for TAHBAZOF, KHOSHNEVISAN,  
4 GHASSEMZADEH, their companies, and their clients, in exchange for personal financial benefits to  
5 PADA, YU, CURRAN, and others, including, but not limited to, cash payments, free meals and drinks,  
6 and other benefits.

7 Means and Methods

8 11. In furtherance of the scheme, and to affect the objects thereof, in the Northern District of  
9 California and elsewhere, GHASSEMZADEH, TAHBAZOF, KHOSHNEVISAN, PADA, YU,  
10 CURRAN, and others known and unknown to the grand jury, used the following manner and means in  
11 an effort to defraud the citizens of the City and County of San Francisco of their right to the honest  
12 services of PADA, YU, and CURRAN, and the San Francisco DBI:

- 13 a. Beginning no later than January 2014, and continuing through at least September 2017,  
14 GHASSEMZADEH joined a conspiracy with TAHBAZOF and KNOSHNEVISAN to  
15 pay bribes to PADA. GHASSEMZADEH would regularly take PADA to lunch and for  
16 drinks. GHASSEMZADEH also paid cash bribes to PADA of between \$1,200 and  
17 \$1,700 each time, all in return for PADA expediting and approving permits for building  
18 projects for GHASSEMZADEH's company and its clients. TAHBAZOF often  
19 reimbursed GHASSEMZADEH for the bribe payments.  
20  
21 b. Starting no later than 2014, defendant GHASSEMZADEH provided financial payments  
22 to CURRAN, through TAHBAZOF, in connection with, and as a reward for the  
23 inspections that CURRAN conducted for GHASSEMZADEH and TAHBAZOF's  
24 companies or clients. GHASSEMZADEH and TAHBAZOF paid CURRAN  
25 approximately \$1,500 for each inspection CURRAN conducted.  
26  
27 c. Beginning no later than December 2017 and continuing through at least February 2021,  
28 GHASSEMZADEH offered and paid bribes to YU in the form of cash, free meals,

1 drinks, and other benefits in return for YU issuing permits for plans submitted to DBI by  
2 TAHBAZOF, KHOSHNEVISAN, and GHASSEMZADEH.

3 12. The defendant and other members of the conspiracy concealed the scheme and  
4 conspiracy from the City of San Francisco and DBI by concealing and not disclosing the cash payments,  
5 meals, gifts, and other benefits. Had the scheme been known by DBI, it had a natural tendency to  
6 influence, and was capable of influencing, the actions of DBI. Specifically, If DBI had known about the  
7 bribe payments made by TAHBAZOF, KHOSHNEVISAN, and GHASSEMZADEH, all individuals  
8 with business before DBI, to PADA, YU, and CURRAN, they would not have allowed PADA, YU, or  
9 CURRAN to issue permits or inspection approvals for TAHBAZOF, KHOSHNEVISAN, or  
10 GHASSEMZADEH's building plans and projects.

11 COUNT ONE: (18 U.S.C. § 1349 – Conspiracy to Commit Honest Services Wire Fraud)

12 13. Beginning at an unknown date, but as early as in or about January 2014 and continuing  
13 through in or about February 2021, in the Northern District of California and elsewhere, the defendant,  
14 BAHMAN GHASSEMZADEH  
15 did knowingly and intentionally conspire with TAHBAZOF, KHOSHNEVISAN, PADA, YU,  
16 CURRAN, and others, known and unknown to the United States Attorney, to commit honest services  
17 wire fraud; that is, having devised and intending to devise a material scheme and artifice to defraud the  
18 City and County of San Francisco (the "City"), and the citizens of San Francisco of their right to the  
19 honest and faithful services of the Department of Building Inspections (DBI) through bribery,  
20 kickbacks, and the concealment of material information, to transmit and cause to be transmitted by  
21 means of wire communication in interstate commerce writings, signs, signals, pictures and sounds for  
22 the purpose of executing such scheme and artifice, in violation of Title 18, United States Code, Sections  
23 1343 and 1346. All in violation of Title 18, United States Code, Section 1349.

24 FORFEITURE ALLEGATION: (18 U.S.C. § 981(a)(1)(C) and 28 U.S.C. § 2461(c))

25 14. The allegations contained in this Information are re-alleged and incorporated by reference  
26 for the purpose of alleging forfeiture pursuant to Title 18, United States Code, Section 981(a)(1)(C) and  
27 Title 28, United States Code, Section 2461(c).  
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1 15. Upon conviction for the offense set forth in this Information, the defendant,

2 BAHMAN GHASSEMZADEH

3 shall forfeit to the United States, pursuant to Title 18, United States Code, Section 981(a)(1)(C) and  
4 Title 28, United States Code, Section 2461(c), all property, real or personal, constituting, or derived  
5 from proceeds the defendant obtained directly and indirectly, as the result of those violations.

6 If any of the property described above, as a result of any act or omission of the defendant:

- 7 a. cannot be located upon exercise of due diligence;  
8 b. has been transferred or sold to, or deposited with, a third party;  
9 c. has been placed beyond the jurisdiction of the court;  
10 d. has been substantially diminished in value; or  
11 e. has been commingled with other property which cannot be divided without  
12 difficulty,

13 the United States of America shall be entitled to forfeiture of substitute property pursuant to Title 21,  
14 United States Code, Section 853(p), as incorporated by Title 28, United States Code, Section 2461(c).

15 All pursuant to Title 18, United States Code, Section 981(a)(1)(C), Title 28, United States Code,  
16 Section 2461(c), and Federal Rule of Criminal Procedure 32.2.

17  
18 DATED: November 9, 2023 \_\_\_\_\_

THOMAS A. COLTHURST  
Attorney for the United States

19  
20 /s/ David J. Ward  
DAVID J. WARD  
Assistant United States Attorney  
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