

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF COLUMBIA

UNITED STATES OF AMERICA )  
 )  
 v. ) No. 1:22-mj-76 (GMH)  
 )  
 ARIAN TAHERZADEH & )  
 HAIDER ALI, )  
 )  
 Defendants. )

**CLARIFICATION AND SUPPLEMENT TO GOVERNMENT’S SUPPLEMENTAL  
MEMORANDUM IN SUPPORT OF MOTION FOR DETENTION**

Consistent with the Government’s commitment to providing the Court and Defendants relevant information on an ongoing basis, the Government provides the following clarification with respect to the three firearms cases described earlier today in the Government’s Supplemental Memorandum in Support of Motion for Detention, and provides additional evidence in support of the information previously provided regarding the Defendants’ association with an M4 rifle.

First, as the Government described in its supplemental motion, on Friday, Witness 3 received an unsolicited package in the mail, with a return address of USSP and the Defendants’ apartment building, that, when opened, revealed firearms cases that appeared to correspond to a P365 9MM Sig Sauer, a P365 XL 9MM Sig Sauer 9MM, and a Glock 19 Generation 4 9MM—none of which were firearms recovered in the searches undertaken in this investigation (ECF No. 11 at 8).

When Witness 3 reported the package to the FBI on Friday, he had not fully opened it or reviewed its contents. At that time, Witness 3 speculated that the package could contain kitchen items including Pyrex containers and bottles of alcohol that he had left behind at Penthouse 5, the rent-free apartment that Taherzadeh provided to him, when he moved out in January 2022. The

FBI took possession of the package and did not open it and review its contents until back at an FBI facility.

Today, shortly after the Government filed its supplemental motion, the FBI spoke again to Witness 3. When Witness 3 learned for the first time from the FBI what the box had contained, he stated that the firearms cases and cigars might have been items that he had left behind in Penthouse 5. Accordingly, to confirm whether the cases belonged to Witness 3, FBI agents met Witness 3 at his apartment late this evening as soon as he returned from out-of-state travel and examined Witness 3's firearms. The three firearms cases that were mailed to Witness 3 last week correspond to three firearms that Witness 3 owns.

Notably, Witness 3 reports that after Witness 3 moved out of Penthouse 5 in January 2022, he saw Taherzadeh approximately once a week for dinner, including on April 1, 2022, and Taherzadeh never mentioned items that Witness 3 had left behind or made any attempts to return items to Witness 3 in that time period. Tellingly, only the gun cases and ammunition magazines, not the kitchen items, were sent to Witness 3 after Taherzadeh was inadvertently tipped off about a federal investigation. Accordingly, the Government continues to believe that the package that Witness 3 received represents efforts by Taherzadeh and/or Ali to secretly remove evidence of their criminal scheme from the apartment building.

Second, this evening, the FBI recovered an AR-15/M4 variant rifle that is believed to belong to Taherzadeh, and which matches the appearance of the rifle in the video of Taherzadeh at the gun range, wearing a shirt with a USSS patch, (*see* ECF 7 at 21) and also is similar to the description of the weapon that the former Marine reported seeing in connection with Taherzadeh's and Ali's attempts to recruit him for purported DHS operations (*see* ECF 11 at 7-8).



In addition, to clarify, the former Marine reported seeing—on multiple occasions— an M4 rifle and related, illegal firearms equipment in Taherzadeh’s apartment in the District of Columbia, where such a weapon, high-capacity ammunition magazines, and suppressor are prohibited.

Respectfully submitted,

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