

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MICHIGAN

UNITED STATES OF AMERICA,

Case No. 20-cr-20594

Plaintiff,

Hon. Denise Page Hood

v.

AMIN HASANZADEH,

Defendant.

_____ /

**GOVERNMENT'S MOTION TO
DISMISS INDICTMENT WITHOUT PREJUDICE**

The government respectfully moves to dismiss the Indictment in this case, ECF No. 21, PageID.79, without prejudice. On September 14, 2023, President Joseph R. Biden signed an Executive Grant of Clemency with respect to Defendant Amin Hasanzadeh and the charges set forth in the Indictment. *See* Exhibit 1. Because the full pardon is conditioned on a number of terms, the government moves that the charges be dismissed without prejudice. The government further requests that, as a result of the dismissal without prejudice, the defendant be released from pretrial supervision upon the termination of this action.

Respectfully submitted,

DAWN N. ISON
United States Attorney

s/ Douglas C. Salzenstein
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s/ Adam P. Barry
Adam P. Barry
Trial Attorney
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CERTIFICATE OF SERVICE

I hereby certify that on September 21, 2023, I filed the foregoing using the Court's CM/ECF system, which will send notice to all registered parties.

s/Douglas C. Salzenstein
Assistant U.S. Attorney

EXHIBIT 1

Executive Grant of Clemency

JOSEPH R. BIDEN, JR.

President of the United States of America

TO ALL TO WHOM THESE PRESENTS SHALL COME, GREETING:

BE IT KNOWN, THAT THIS DAY, I, JOSEPH R. BIDEN, JR., PRESIDENT OF THE UNITED STATES, PURSUANT TO MY POWERS UNDER ARTICLE II, SECTION 2, CLAUSE 1, OF THE CONSTITUTION, AFTER CONSIDERING THE APPLICATION FOR EXECUTIVE CLEMENCY, HAVE GRANTED UNTO

AMIN HASANZADEH

A FULL PARDON

FOR THOSE OFFENSES charged in an indictment (Docket No. 2:20-cr-20594) filed in the United States District Court for the Eastern District of Michigan on December 16, 2020, for violations of Parts 560.203, 560.204, and 560.418, Title 31, Code of Federal Regulations; and Section 1705, Title 50, United States Code (**Counts One through Eight**); and Section 853(p), Title 21, and Section 2461(c), Title 28, United States Code (**Forfeiture Count**).

I CONDITION THE PARDON UPON THE FOLLOWING TERMS:

- (1) the said AMIN HASANZADEH shall not commit any additional crime against the United States or in violation of the laws of the United States subsequent to the acceptance of this Pardon;
- (2) the said AMIN HASANZADEH shall waive and release any all claims, demands, rights, and causes of action of whatsoever kind and nature against the United States of America, its agents, servants, and employees;
- (3) the said AMIN HASANZADEH shall waive any and all claims to funds already seized as part of the prosecution of offenses subject to this Pardon; and
- (4) the said AMIN HASANZADEH shall not accept or otherwise receive any financial benefit directly or indirectly, in any manner or amount, from any book, movie, or other publication or production, in any form or media, about his situation;

IF AT ANY TIME the said AMIN HASANZADEH violates one or more of the aforementioned terms, as determined by me in my complete discretion (or by a future President in his or her complete discretion), this Pardon may be voided in its entirety.

THIS GRANT SHALL BECOME EFFECTIVE only upon the delivery and presentment of a certified copy of this document, electronic or hard copy, to the said AMIN HASANZADEH.

IN TESTIMONY WHEREOF, I have hereunto signed my name and caused the seal of the Department of Justice to be affixed.



Done at the City of Washington this 14th
day of September in the year of our Lord
Two thousand and Twenty-three and of the
Independence of the United States the Two
hundred and Forty-eighth.

A handwritten signature in black ink, appearing to read "Joseph R. Biden, Jr.", written in a cursive style.

JOSEPH R. BIDEN, JR.
PRESIDENT