



U.S. Department of Justice

United States Attorney  
Southern District of New York

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The Silvio J. Mollo Building  
One Saint Andrew's Plaza  
New York, New York 10007

June 5, 2020

Via ECF

The Honorable Alison J. Nathan  
United States District Judge  
Southern District of New York  
500 Pearl Street  
New York, New York 10007

**Re: *United States v. Ali Sadr Hashemi Nejadin*, 18 Cr. 224 (AJN)**

Dear Judge Nathan:

The Government respectfully submits the enclosed application for an order of *nolle prosequi* of the Indictments filed in this case against Ali Sadr Hashemi Nejadin (“Sadr”) and Bahram Karimi. The Court is familiar with disclosure-related issues that arose during the March 2020 trial as well as in pre- and post-trial motion practice, including with respect to pretrial suppression litigation. In light of those issues; our recognition that Sadr would have pursued different investigative, litigation, and trial strategies had the disclosures been made; the need for continued litigation about suppression issues and the potential for suppression of evidence; and the resources that would be required to address all of these issues and to proceed with the prosecution, the Government has determined that it would not be in the interests of justice to further prosecute this case.

Should the Court desire any further information, I will be available to respond.

Respectfully submitted,

/s/

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GEOFFREY S. BERMAN  
United States Attorney

Enclosure

Cc: Defense Counsel (via ECF)