IN THE UNITED STATES DISTRICT COURT FOR THE
EASTERN DISTRICT OF VIRGINIA

Alexandria Division

UNITED STATES OF AMERICA v. RAYMOND RAHBAR JR., RYAN MACAULAY, *Defendants*.	Case No. 1:24-CR-180

GOVERNMENT'S MOTION TO DISMISS THE INDICTMENT AND THE REMAINING COUNTS OF THE SUPERSEDING INDICTMENT

The United States, by and through undersigned counsel, hereby moves this Honorable Court for an Order dismissing:

- As to defendant Raymond Rahbar, Jr.: Counts 1–11 of the Indictment, Dkt. 1; and Counts 2–11, 13–14 of the Superseding Indictment, Dkt. 38; and
- As to defendant Ryan Macaulay: Counts 1, 3, 5, and 8 of the Indictment, Dkt. 1.

On April 10, 2025, Defendant Rahbar pled guilty to Counts 1 and 12 of the Superseding Indictment. Dkts. 108, 109. Per the terms of the Plea Agreement, the Government agreed to dismiss the Indictment and the remaining counts of the Superseding Indictment at the conclusion of the defendant's sentencing hearing. Dkt. 109 at ¶ 7. On September 25, 2025, this Court sentenced the defendant to a total of 54 months incarceration. As such, the Government now moves this Court for an order dismissing Counts 1–11 of the Indictment, Dkt. 1; and Counts 2–11, 13–14 of the Superseding Indictment, Dkt. 38, as to Defendant Rahbar.

On April 15, 2025, Defendant Macaulay pled guilty to Counts 1, 5, 7, and 11 of the Superseding Indictment without a plea agreement. Dkts. 112, 113. On September 25, 2025, this Court sentenced the defendant to 24 months incarceration. The Government now moves this

Court for an order dismissing Counts 1, 3, 5, and 8 of the Indictment, Dkt. 1, as to Defendant Macaulay.

Respectfully submitted,

Lindsey Halligan
United States Attorney

By: /s/
Kristin S. Starr
Assistant United States Attorney

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Defendants.

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ORDER

This matter having come before the Court on the government's Motion to Dismiss the Indictment and the Remaining Counts of the Superseding Indictment and the Court having considered the motion, it is hereby

ORDERED that Counts 1–11 of the Indictment, Dkt. 1; and Counts 2–11, 13–14 of the Superseding Indictment, Dkt. 38; are dismissed as to defendant Raymond Rahbar, Jr., and

ORDERED that Counts 1, 3, 5, and 8 of the Indictment, Dkt. 1, are dismissed as to defendant Ryan Macaulay.

Date: _____
Alexandria, Virginia

_____

CERTIFICATE OF SERVICE

I hereby certify that, on September 25, 2025, I electronically filed the foregoing with the Clerk of Court using the CM/ECF system, which automatically generated a Notice of Electronic Filing to counsel of record in this case.

/s/
Kristin S. Starr
Assistant United States Attorney