

**UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF FLORIDA
ORLANDO DIVISION**

JOHN DOE I, JOHN DOE II, and JOHN DOE III,	)	
	)	
	)	
<i>Plaintiffs,</i>	)	Case No. 6:25-cv-219-GAP-
	)	DCI
v.	)	
	)	
PARVIZ SABETI,	)	
	)	
<i>Defendant.</i>	)	

DECLARATION OF PARVIZ SABETI

I, Parviz Sabeti, declare as follows:

1. Plaintiffs have claimed that I have not denied their false allegations against me. Plaintiffs’ Opposition to Defendant’s Motion for Reconsideration (D.E. 60) (“Opp’n”) at 16. This is incorrect. *See* Defs’ Mot. to Dismiss (D.E. 40) at 1; Defs’ Mot. to Dismiss First Am. Compl. (D.E. 59) at 2.

2. As it relates to social media, I have never had a social media account and have never posted on a social media platform.

3. I know Shahin Nejad (Nezhad) ([@NejadNezhad](#)) (D.E. 61-1 at 30), and Plaintiffs have misconstrued Mr. Nejad’s post on X. The post, as translated by Plaintiffs, is provided below. It is clear from the post that “they’re dead” is a reference to myself and other Iranians who served under the Shah’s

administration before the Iranian Revolution in 1979, and is not a reference to Plaintiffs, D.E. 61-1 at 30:

- a. Undoubtedly, the complaint against His Excellency Parviz Sabeti is an attack on Aryamehr and on Pahlavism. The wave of Iranian nationalism and monarchism has peaked, and filing a complaint against the most well-known figure of SAVAK is a foolish attempt by the leftist and Islamist terrorists of the 1960s and 70s to drain the energy of the true fighters against the Islamic Republic. Once again, the same nonsense about bears, ceiling fans, kebabs, and pulled nails!!! These people won't stop harassing Iran and Iranians until they're dead. We will not hold back in supporting Mr. Sabeti.

4. I met Mr. Nejad approximately fifteen years ago. He is a political activist for the Iranian Renaissance movement. In the fifteen years I have known him, I met him only once in person. I speak to him a few times a year. The only conversation I had with him about this case was when I expressed my disagreement with a social media post by Shahram Makoui (@ShahramMakoui48) (ECF 61-1 at 28), which had been shown to me by others.

5. I, once again, deny having any relationship with, being affiliated with, or coordinating in any way with the user identified as, @ShahramMakoui48 (ECF 61-1 at 28), Dr. A Shahram Makoui. I have previously explained that on one occasion, I spoke very briefly with him by phone. *See* D.E. 55-1 ¶ 33. This conversation came about when I told Mr. Nejad, during a phone call, that I was upset about Makoui's post, and Mr. Nejad, who knew Makoui, thought it would be more impactful to tell him directly so he

added Makoui to the call. (Mr. Nejad is the “intermediary” I referred to in my previous declaration. D.E. 55-1 ¶ 33.) The call was short and only lasted a few minutes. The purpose of that call was for me to tell him that his post about this case was highly inappropriate and to ask him to stop stoking political strife about this case. That’s what I did. He said he understood and apologized. We otherwise have never spoken or interacted.

6. Bijan Farhoodi (@bijann) (D.E. 61-3 at 4) first reached out to me when he was a reporter for the Voice of America. Mr. Farhoodi lives in the United Kingdom, and I have never met him in person. I have only spoken to him twice by phone. When news broke of the lawsuit, prior to my being served, Mr. Farhoodi reached out to me for comment. I informed Mr. Farhoodi that I had not seen the complaint and other filings yet, but that from the news stories, it appeared the lawsuit was politically motivated.

7. Except for those three individuals (@ShahramMakoui48, Mr. Nejad, and Mr. Farhoodi), I do not personally know any of the social media users whose posts Plaintiffs have presented to the Court:

- a. I do not know, nor have I ever heard of Babel (@babbell1400) (D.E. 61-1 at 4).
- b. I do not know, nor have I ever heard of آزادی   (@Hemase Azadi) (D.E. 61-1 at 5).

- c. I do not know, nor have I ever heard of Alexi base.eth (Ø,G) (@WilliamDeLarge6) (D.E. 61-1 at 6).
- d. I do not know, nor have I ever heard of Alireza (@stillalirez) (D.E. 61-1 at 6).
- e. I do not know, nor have I ever heard of Mojibdl (@mojibdl1) (D.E. 61-1 at 8).
- f. I do not know, nor have I ever heard of EternalIran (@phoenixxxxxx2022) (D.E. 61-1 at 9).
- g. I do not know, nor have I ever heard of   عاشق پهلوی   (@FaryadAzad88778) (D.E. 61-1 at 13).
- h. I do not know, nor have I ever heard of تيرداد المجوسي (@magustyrdat) (D.E. 61-1 at 14).
- i. I do not know, nor have I ever heard of MF (@MFarahani) (D.E. 61-1 at 16).
- j. I do not know, nor have I ever heard of   ٢ (@IranyAshka94837) (D.E. 61-1 at 17).
- k. I do not know, nor have I ever heard of King of Persia (@MorgheSaharkhan) (D.E. 61-1 at 18).
- l. I do not know, nor have I ever heard of Malamadre (@rdaya12) (D.E. 61-1 at 19).

- m. I do not know, nor have I ever heard of Elanion (@Elani0n) (D.E. 61-1 at 20).
- n. I do not know, nor have I ever heard of Saeed (@Saeed31314009) (D.E. 61-1 at 21).
- o. I do not know, nor have I ever heard of Kaveh Shahrooz (@kshahrooz) (D.E. 61-1 at 22).
- p. I do not know, nor have I ever heard of moh (@moh1625659) (D.E. 61-1 at 23).
- q. I do not know, nor have I ever heard of EFZi (@EFZiiii) (D.E. 61-1 at 24).
- r. I do not know, nor have I ever heard of carl (@CarlMeril1970) (D.E. 61-1 at 25).
- s. I do not know, nor have I ever heard of Raha Bahreini (@RahaBahreini) (D.E. 61-1 at 26).
- t. I do not know, nor have I ever heard of 🚩 RustCole ● (@DarkSecretCosmo) (D.E. 61-1 at 27).
- u. I do not know, nor have I ever heard of Mehdi Hajati (@MehdiHajati) (D.E. 61-1 at 32).
- v. I do not know, nor have I ever heard of SAVAK 🦋 (@DRSAVAKI) (D.E. 61-1 at 34).

- w. I do not know, nor have I ever heard of  PERSIA (@PersiaTheGreat0) (D.E. 61-3 at 9).
- x. I do not know, nor have I ever heard of رستم خندان (@yelling_fish) (D.E. 61-3 at 12).
- y. I do not know, nor have I ever heard of Reza (@Reza563783461) (D.E. 61-3 at 14).
- z. I do not know, nor have I ever heard of Kaveh Taheri  (@MrJournaliste) (D.E. 61-4 at 3).
- aa. I do not know, nor have I ever heard of M.R.Reza (@DrMRReza) (D.E. 61-4 at 5).
- bb. I do not know, nor have I ever heard of کیسه (@baba_kiseh) (D.E. 61-4 at 7).
- cc. I do not know, nor have I ever heard of Richard Presland (@richarap524) (D.E. 61-4 at 7).
- dd. I do not know, nor have I ever heard of  (@nevermind10123) (D.E. 61-5 at 2).
- ee. I do not know, nor have I ever heard of Koorosh Farhadpour  (@Kfarhadpour) (D.E. 61-6 at 2).
- ff. I do not know, nor have I ever heard of Shahriar Nikbin (@shahnikbin) (D.E. 61-6 at 2).

gg. I do not know, nor have I ever heard of پاسبان (ajan_iran) (D.E. 61-6 at 2).

hh. I do not know, nor have I ever heard of Ho03in4 (D.E. 61-3 at 6).

ii. I do not know, nor have I ever heard of Safkar_.saeed (D.E. 61-3 at 6).

jj. I do not know, nor have I ever heard of aliasghar._777 (D.E. 61-3 at 6).

kk. I do not know Lawdan Bazargan (@LawdanBazargan) (D.E. 61-1 at 3). However, I have heard of this person previously as she is a vocal, political activist and has been critical of me in the past. I have not communicated with this person, directly or indirectly.

ll. I do not know Shadi Sadr (@ShadiSadr) (D.E. 61-1 at 12). However, I have heard of this person previously as she is a vocal, political activist and has been critical of me in the past. I have not communicated with this person, directly or indirectly.

mm. I do not know Kambiz Ghafouri (@KhambizGhafouri) (D.E. 61-1 at 26). However, I have heard of this person previously as he is a vocal, political activist and has been critical of me in the past. I have not communicated with this person, directly or indirectly.

nn. I do not know Morteza Esmailpour, (D.E. 61 at 4). However, I have heard of this person previously. He is a politically active and vocal monarchist. I have not communicated with this person, directly or indirectly.

8. I do not know, nor have I ever heard of Amirhossein Moradi (moradiamirhossein18@gmail.com), an email user identified by Plaintiffs at 61-8 at 2.

DATED: June 16, 2025

/s/ Parviz Sabeti*
Parviz Sabeti

* I certify that I have the signed original of this document that is available for inspection during normal business hours by the court or a party to this action.

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