

Treasury Designates Illicit Russia–Iran Oil Network Supporting the Assad Regime, Hizballah, and HAMAS

November 20, 2018

WASHINGTON – Today, the U.S. Department of the Treasury’s Office of Foreign Assets Control (OFAC) is designating nine targets in an international network through which the Iranian regime, working with Russian companies, provides millions of barrels of oil to the Syrian government. The Assad regime, in turn, facilitates the movement of hundreds of millions of U.S. dollars (USD) to the Islamic Revolutionary Guard Corps-Qods Force (IRGC-QF) for onward transfer to HAMAS and Hizballah. U.S. sanctions prohibit material support to the Government of Syria, including shipments of oil to Syrian government-controlled ports, as well as material support to designated terrorist groups.

“Today we are acting against a complex scheme Iran and Russia have used to bolster the Assad regime and generate funds for Iranian malign activity,” said Treasury Secretary Steven Mnuchin. “Central Bank of Iran officials continue to exploit the international financial system, and in this case even used a company whose name suggests a trade in humanitarian goods as a tool to facilitate financial transfers supporting this oil scheme. We are issuing an Advisory today identifying the grave risks to the maritime community if they participate in shipping oil to the Government of Syria. The United States is committed to imposing a financial toll on Iran, Russia, and others for their efforts to solidify Assad’s authoritarian rule, as well as disrupt the Iranian regime’s funding of terrorist organizations.”

Today’s designations target critical actors in this scheme, including Syrian national **Mohammad Amer Alchwiki (Alchwiki)** and his Russia-based company, **Global Vision Group**. Alchwiki and his company are central to (1) the delivery of oil from Iran to Syria, and (2) the transfer of funds to the IRGC-QF’s lethal proxies. Today’s designations also highlight the important role that Central Bank of Iran (CBI) officials play in facilitating this scheme.

Throughout the Syrian Civil War, the Iranian regime has continued to provide military and financial support to the Assad regime, enabling it to commit mass atrocities against the Syrian people. The Iranian regime also continues to fund terrorism, providing hundreds of millions of dollars to its regional proxies and U.S.-designated terrorist organizations, HAMAS, and Lebanese

Hizballah (Hizballah), further destabilizing the region. All the while, Iranian citizens suffer from their government's neglect and corruption, including through a lack of stable food and water supplies, electricity, and other essential needs.

“The Iranian regime continues to prioritize spending money on fomenting terror over supporting its own people,” said Undersecretary for Terrorism and Financial Intelligence, Sigal Mandelker. “This is yet another example of the regime using the proceeds of millions of barrels of its oil to fund terrorists and the murderous Assad regime to the detriment of its own people. The United States will aggressively seek to impose sanctions against any party involved in shipping oil to Syria, or seeking to evade our sanctions on Iranian oil. Shipping companies, insurers, vessel owners, managers, and operators should all be aware of the grave consequences of engaging in sanctionable conduct involving Iranian oil shipments.”

U.S. sanctions prohibit material support to the Assad regime and U.S.-designated terrorist groups, including the IRGC-QF, HAMAS, and Hizballah. All assets subject to U.S. jurisdiction of the individuals and entities added to the Specially Designated Nationals List (SDN List), and of any other entities blocked by operation of law as a result of their ownership by a sanctioned party, are frozen, and U.S. persons are generally prohibited from dealings with them.

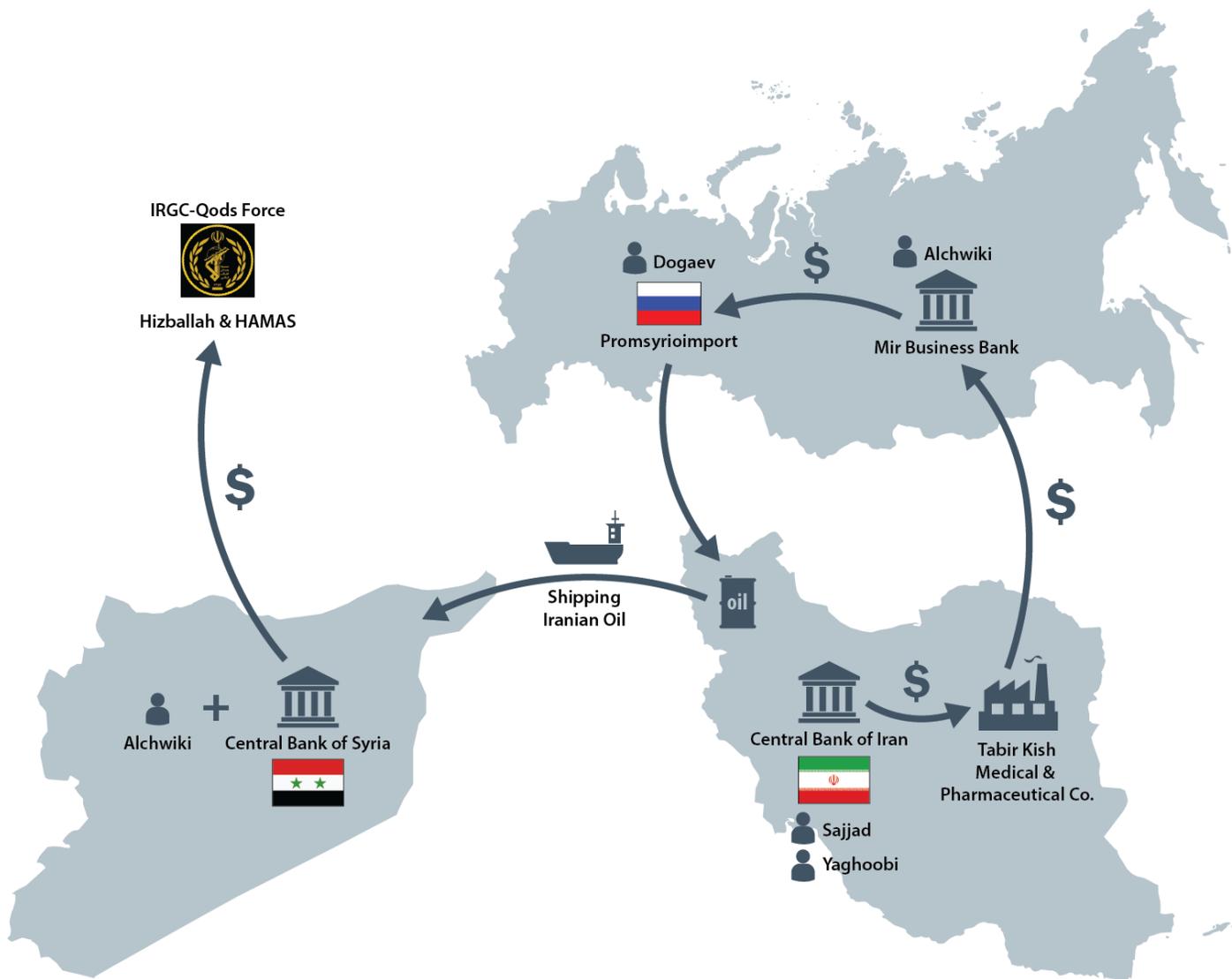
RUSSIAN AND IRANIAN GOVERNMENTS FACILITATION OF OIL SHIPMENTS TO ASSAD

Using an array of mechanisms designed to obfuscate their activities, Alchwiki's Russia-based Global Vision Group coordinates with the National Iranian Oil Company (NIOC) to remit payment for oil being shipped to Syria.

Global Vision Group does this by working with state-owned Russian company **Promsyrioimport**, a subsidiary of the Russian Ministry of Energy (Minenergo), to facilitate shipments of Iranian oil from NIOC to Syria. To deliver the oil from Iran to the Syrian regime, Global Vision Group uses a number of vessels, many of which have been insured by European companies. Since at least 2014, vessels carrying Iranian oil have switched off the Automatic Identification System (AIS) onboard before delivering oil to Syria, as a means of concealing the true destination and recipient of this Iranian oil.

Today, OFAC is issuing an **Advisory**  to the maritime community regarding the sanctions risks of shipping oil to the Government of Syria, including a non-exhaustive list of vessels that have delivered oil to Syria since 2016.

To assist Syria in paying Russia for this oil, Iran sends funds to Russia through Alchwiki and Global Vision Group. To conceal its involvement in these transactions, the CBI makes these payments to **Mir Business Bank** using Iran-based **Tadbir Kish Medical and Pharmaceutical Company (Tadbir Kish)**. Despite the reference to humanitarian goods in Tadbir Kish's name, the company has repeatedly been used to facilitate illicit transfers in support of this oil scheme. Following the CBI's transfer of funds from Tadbir Kish to Global Vision Group in Russia, Global Vision Group transfers payment to Russia state-owned Promsyrioimport to pay for the oil. Mir Business Bank was designated on November 5, 2018, pursuant to Executive Order (E.O.) 13224, and is a wholly-owned subsidiary of Iran's Bank Melli, which was designated for acting as conduit for payments to IRGC-QF.



Visual Depiction of the Alchwiki Network

CBI senior officials play a critical role in this arrangement. **Rasul Sajjad**, CBI's International Department Director, and **Hossein Yaghoobi**, CBI's Vice Governor for International Affairs, have both assisted in facilitating Alchwiki's transfers. **Andrey Dogaev**, First Deputy Director of Promsyrimport, has worked closely with Yaghoobi to coordinate the sale of Iranian crude to the Government of Syria.



Photo of Mohammad Amer Alchwiki and Andrey Dogaev

Through this scheme, Promsyrimport, working with Global Vision Group, has exported millions of barrels of Iranian oil into Syria. This scheme has also funneled millions of dollars between the CBI and Alchwiki's Mir Business Bank account in Russia.



Alchwiki posing in Moscow

ALCHWIKI WORKING IN TANDEM WITH IRGC-OF TO PROVIDE FUNDS TO HIZBALLAH AND HAMAS

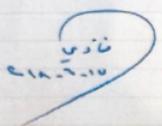
In addition to the scheme above, Alchwiki also acts as a critical conduit for the transfer of hundreds of millions of USD banknotes to Iranian proxies in the Levant, including U.S.-designated foreign terrorist organizations and specially designated global terrorist groups Hizballah and HAMAS. Using the Central Bank of Syria, Alchwiki coordinates the transfers with Hizballah official Muhammad Qasir, who heads the Hizballah unit responsible for facilitating the transfer of weapons, technology, and other support from Syria to Lebanon. OFAC designated Qasir on May 15, 2018, for acting for or on behalf of Hizballah.

To: MR-R. Sajjad
 Director international Dept.

Regarding your crediting the
 Account of the CBS number: 83
 95
 in the CBI, I am Mr. Fadi and
 Mr. MHD Amer Alchwiki we
 confirming that the amount of
 (63) M. sixty three million USD
 has been counted and received by
 US on 17/04/2018

Mr Fadi

Mr. MHD-Amer
 Al-chwiki





A letter from Alchwiki and Muhammad Qasir, a.k.a. Mr. Fadi, to Rasoul Sajjad of CBI confirming receipt of U.S. \$63 million (left), and Alchwiki posing with stacks of USD (right)

Senior CBI officials played a key role in this scheme, working with their counterparts in Syria and Alchwiki to facilitate transfer of foreign currency to Hizballah, and together have coordinated the transfer of millions of dollars through this network. Specifically, CBI Official, Hossein Yaghoobi, who also has a history of working with Hizballah in Lebanon, has coordinated financial transfers intended for Hizballah with the IRGC-QF and Hizballah personnel.

Muhammad Qasim al-Bazzal, a Hizballah member and associate of Qasir, is being designated for his support to Hizballah.

DESIGNATION BASES AND AUTHORITIES

Mohamed Amer Alchwiki is being designated pursuant to E.O. 13582 for (1) having materially assisted, sponsored, or provided financial, material, or technological support for, or goods or services in support of the Central Bank of Syria, an entity identified as meeting the definition of the Government of Syria, which is blocked under E.O. 13582 and (2) having acted or purported to act for or on behalf of Global Vision Group. Alchwiki is also being designated pursuant to E.O. 13224 for assisting in, sponsoring, or providing financial, material, or technological support for, or financial or other services to or in support of Hizballah and IRGC-QF.

Global Vision Group is being designated pursuant to E.O. 13582 for having materially assisted, sponsored, or provided financial, material, or technological support for, or goods or services in support of, Syria's Baniyas Refinery Company and the Central Bank of Syria, entities identified as meeting the definition of the Government of Syria. Global Vision Group is also being designated pursuant to E.O. 13224.

Promsyrioimport is being designated pursuant to E.O. 13582 for having materially assisted, sponsored, or provided financial, material, or technological support for, or goods or services in support of the Syrian Company for Oil Transport (SCOT), an entity identified as meeting the definition of the Government of Syria, which is blocked under E.O. 13582.

Andrey Dogaev is being designated pursuant to E.O. 13582 for having acted or purported to act, for or on behalf of directly or indirectly, Promsyrioimport.

Mir Business Bank is being designated pursuant to E.O. 13582 for having materially assisted, sponsored, or provided financial, material, or technological support for, or goods or services in support of Global Vision Group.

Tadbir Kish Medical and Pharmaceutical Company is being designated pursuant to E.O. 13582 for having materially assisted, sponsored, or provided financial, material, or technological support for, or goods or services in support of Global Vision Group.

Rasul Sajjad and Hossein Yaghoobi are being designated pursuant to E.O. 13224 for assisting in, sponsoring, or providing financial, material, or technological support for, or financial or other services to or in support of the IRGC-QF.

Muhammad Qasim al-Bazzal is being designated pursuant to E.O. 13224 for acting for or on behalf of Hizballah.

[Identifying information on the individuals and entities designated today.](#)

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