# Treasury Targets Procurement Networks Supporting Iran's Missile Proliferation Programs

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WASHINGTON – Today, the U.S. Department of the Treasury Office of Foreign Assets Control (OFAC) targeted two Iranian regime-linked networks pursuant to Executive Order (E.O.) 13382 for engaging in covert procurement activities benefitting multiple Iranian military organizations. One network, led by Hamed Dehghan, has used a Hong Kong-based front company to evade U.S. and international sanctions and facilitate tens of millions of dollars' worth of proliferation activities targeting U.S. technology and electronic components, for persons related to the Islamic Revolutionary Guard Corps (IRGC) and the Iranian regime's missile program. The second network, led by Seyed Hossein Shariat, has procured various aluminum alloy products on behalf of components entities owned or controlled by Iran's Ministry of Defense and Armed Forces Logistics (MODAFL).

"As the Iranian regime attempts to use complex schemes to hide its efforts to bolster its WMD program, the U.S. government will continue to thwart them at every turn," said Treasury Under Secretary for Terrorism and Financial Intelligence Sigal Mandelker. "We urge governments worldwide to recognize the extraordinary lengths to which the regime in Tehran will go to conceal its behavior, and to ensure that their companies and financial institutions are not facilitating Iran's proliferation activities."

### **DEHGHAN NETWORK**

Today's designations, which was the culmination of Treasury's close collaboration with the Federal Bureau of Investigation, target critical actors in this scheme, including two Iranian nationals, Hamed Dehghan and Hadi Dehghan. Since 2017 alone, these actors have used a network of intermediary companies, including a Hong Kong-based front company, to facilitate more than ten million dollars' worth of proliferation-related transactions.

Hamed Dehghan is the chief executive officer and chairman of Pishtazan Kavosh Gostar Boshra, LLC (PKGB), which has played a central role in this procurement network. He also has served as the general manager and chairman of the board of Ebtekar Sanat Ilya, another company

leveraged by the network. Hamed Dehghan, his company Ebtekar Sanat Ilya, and Hadi Dehghan have procured more than one million dollars' worth of military-grade electronic components for Rastafann Engineering Company (Rastafann), and have had multiple other Iranian military clientele. Rastafann was designated on October 13, 2017, pursuant to E.O. 13382 for having provided support to the IRGC and Naval Defence Missile Industry Group. The IRGC and Naval Defence Missile Industry Group were themselves designated pursuant to E.O. 13382 in 2007 and 2010, respectively.

Ebtekar Sanat Ilya's customers also include the Iran Aircraft Manufacturing Industrial Company (HESA), Shahid Bakeri Industrial Group (SBIG), and Shahid Hemmat Industrial Group (SHIG), all of which are designated pursuant to E.O. 13382. The European Union and the United Nations have both designated SBIG and SHIG. HESA is designated by the European Union. OFAC designated HESA pursuant to E.O. 13382 on September 17, 2008, for being owned or controlled by Iran's Ministry of Defense and Armed Forces Logistics (MODAFL) and having provided support to the IRGC.

Also designated today are Shaghayegh Akhaei, who is the general manager and a member of the board of directors of PKGB, and Mahdi Ebrahimzadeh, who has helped Hamed Dehghan with his business procuring electronic components.

# HONG KONG-BASED FRONT COMPANY

Green Industries (Hong Kong) Limited is owned or controlled by Hamed Dehghan, who has used it as a front company to purchase and attempt to purchase export-controlled military end-use equipment from U.S. suppliers for Iranian entities designated by OFAC for their involvement in the Iranian regime's weapons of mass destruction proliferation activities. The company Shafagh Senobar Yazd served as a consignee in Iran for Hamed Dehghan's procurement network. Both companies, Green Industries (Hong Kong) Limited and Shafagh Senobar Yazd are designated pursuant to E.O. 13382.

Hamed Dehghan, Hadi Dehghan, and Ebtekar Sanat Ilya are designated pursuant to E.O. 13382 for having provided, or attempted to provide, financial, material, technological, or other support for, or goods or services in support of, Rastafann.

PKGB and Ebtekar Sanat Ilya are designated pursuant to E.O. 13382 for being owned or controlled by Hamed Dehghan. Mahdi Ebrahimzadeh and Green Industries (Hong Kong) Limited are designated pursuant to E.O. 13382 for providing, or attempting to provide, financial, material, technological or other support for, or goods or services in support of, Hamed

Dehghan. Shafagh Senobar Yazd is designated pursuant to E.O. 13382 for being owned or controlled by, or having acted or purported to act for or on behalf of, directly or indirectly, Hamed Dehghan. Shaghayegh Akhaei is designated pursuant to E.O. 13382 for acting for or on behalf of PKGB.

#### **SHARIAT NETWORK**

OFAC also designated Asre Sanat Eshragh Company and its owner and general manager Seyed Hossein Shariat, pursuant to E.O. 13382. Since at least 2016, Asre Sanat Eshragh Company has procured large amounts of aluminum alloy products for multiple Iranian entities, including Iran Electronic Industries (IEI) and Iran Aviation Industries Organization (IAIO). IEI and IAIO were designated pursuant to E.O. 13382 on September 17, 2008, and December 12, 2013, respectively, for being owned or controlled by MODAFL. IEI has been listed by the European Union and the Japanese government as an entity of concern for proliferation relating to missiles and nuclear weapons, and has also been sanctioned by the governments of Australia, Canada, Norway, and Switzerland. IAIO has been sanctioned by the European Union as an entity linked to Iran's proliferation-sensitive nuclear activities or Iran's development of nuclear weapon delivery systems. MODAFL was designated pursuant to E.O. 13382 in 2007.

The NSG is a multilateral export control regime that seeks to prevent nuclear proliferation by controlling the export of materials, equipment, and technology that can be used to manufacture nuclear weapons. Under United Nations Security Council Resolution 2231 (2015), which endorsed the Joint Comprehensive Plan of Action, the sale, supply, or transfer to Iran of NSG-controlled items is prohibited except cases where the UN Security Council provides advance case-by-case approval, with very narrow exceptions that do not apply in the case of Asre Sanat Eshragh Company.

Asre Sanat Eshragh Company is designated pursuant to E.O. 13382 for having provided, or attempted to provide, financial, material, technological, or other support for, or goods or services in support of IEI. Seyed Hossein Shariat is designated pursuant to E.O. 13382 for acting or purporting to act for or on behalf of, directly or indirectly, Asre Sanat Eshragh Company.

## **SANCTIONS IMPLICATIONS**

As a result of today's action, all property and interests in property of these individuals that are in the United States or in the possession or control of U.S. persons must be blocked and reported to OFAC. OFAC's regulations generally prohibit all dealings by U.S. persons or within (or transiting) the United States that involve any property or interests in property of blocked or designated persons.

In addition, persons that engage in certain transactions with the persons designated today may themselves be exposed to designation. Furthermore, any foreign financial institution that knowingly facilitates a significant transaction or provides significant financial services for any of the individuals designated today could be subject to U.S. correspondent account or payable-through sanctions.

Identifying information on the entities designated today.

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