Treasury Designates Vast Network of IRGC-QF Officials and Front Companies in Iraq, Iran

March 26, 2020

WASHINGTON – The U.S. Department of the Treasury's Office of Foreign Assets Control (OFAC) today designated 20 Iran- and Iraq-based front companies, senior officials, and business associates that provide support to or act for or on behalf of the Islamic Revolutionary Guards Corps-Qods Force (IRGC-QF) in addition to transferring lethal aid to Iranian-backed terrorist militias in Iraq such as Kata'ib Hizballah (KH) and Asa'ib Ahl al-Haq (AAH). Among other malign activities, these entities and individuals perpetrated or supported: smuggling through the Iraqi port of Umm Qasr; money laundering through Iraqi front companies; selling Iranian oil to the Syrian regime; smuggling weapons to Iraq and Yemen; promoting propaganda efforts in Iraq on behalf of the IRGC-QF and its terrorist militias; intimidating Iraqi politicians; and using funds and public donations made to an ostensibly religious institution to supplement IRGC-QF budgets. The terrorist militias supported by the Iranian regime such as KH and AAH have continued to engage in attacks on U.S. and Coalition forces in Iraq.

"Iran employs a web of front companies to fund terrorist groups across the region, siphoning resources away from the Iranian people and prioritizing terrorist proxies over the basic needs of its people," said Treasury Secretary Steven T. Mnuchin. "The United States maintains broad exceptions and authorizations for humanitarian aid including agriculture commodities, food, medicine, and medical devices to help the people of Iran combat the coronavirus."

Today's designations were taken pursuant to Executive Order (E.O.) 13224, as amended, which targets terrorists and those providing support to or acting for or on behalf of designated terrorists or supporting acts of terrorism.

RECONSTRUCTION ORGANIZATION OF THE HOLY SHRINES IN IRAQ

The **Reconstruction Organization of the Holy Shrines in Iraq** (ROHSI) is an IRGC-QF-controlled organization based in Iran and Iraq whose leadership was appointed by the late IRGC-QF Commander Qassem Soleimani. Though ostensibly a religious institution, ROHSI has

transferred millions of dollars to the Iraq-based **Bahjat al Kawthar Company for Construction and Trading Ltd**, also known as **Kosar Company**, another Iraq-based entity under the IRGC-QF's control. Kosar Company has served as a base for Iranian intelligence activities in Iraq, including the shipment of weapons and ammunition to Iranian-backed terrorist militia groups.

Additionally, Kosar Company has received millions of dollars in transfers from the Central Bank of Iran, which was designated pursuant to E.O. 13224 in September 2019 for its financial support of the IRGC-QF and Lebanese Hizballah. Both the IRGC-QF and Hizballah have been designated by the U.S. Department of State as Foreign Terrorist Organizations under section 219 of the Immigration and Nationality Act.

In addition, IRGC-QF officials have used ROHSI's funds to supplement IRGC-QF budgets, likely embezzling public donations intended for the construction and maintenance of Shiite shrines in Iraq.

ROHSI and Kosar Company are being designated pursuant to E.O. 13224 for being owned, controlled, or directed by, directly or indirectly, the IRGC-QF.

OFAC is also designating **Mohammad Jalal Maab**, the current head of ROHSI, who was personally appointed to the position by former IRGC-QF Commander Soleimani. Jalal Maab succeeded **Hassan Pelarak**, an IRGC-QF officer and co-owner of Kosar Company, who was selected by Soleimani to serve as his special assistant on an IRGC-QF-led committee focused on sanctions evasions activity. Pelarak also worked with IRGC-QF officials to transfer missiles, explosives, and small arms to Yemen, intensifying the Yemeni conflict and exacerbating one of the world's worst humanitarian catastrophes.

Mohammad Jalal Maab is being designated pursuant to E.O. 13224 for being a leader or official of ROHSI. Hassan Pelarak is being designated pursuant to E.O. 13224 for having acted or purported to act for or on behalf of, directly or indirectly, the IRGC-QF.

Alireza Fadakar, another co-owner of Kosar Company, has worked in Iraq on behalf of the IRGC-QF for several years and is an IRGC-QF commander in Najaf, Iraq. Muhammad al-Ghorayfi is an IRGC-QF affiliate and employee of Kosar Company who provides administrative support to Fadakar and has facilitated the travel of IRGC-QF officials between Iraq and Iran.

Alireza Fadakar is being designated pursuant to E.O. 13224 for having acted or purported to act for or on behalf of, directly or indirectly, the IRGC-QF. Muhammad al-Ghorayfi is being designated pursuant to E.O. 13224 for having materially assisted, sponsored, or provided

financial, material, or technological support for, or goods or services to or in support of, Alireza Fadakar.

Masoud Shoustaripousti, another co-owner of Kosar Company, has worked in Iraq on behalf of the IRGC-QF for several years and has laundered money for the group. Shoushtaripousti worked with Mashallah Bakhtiari, who used Kosar Company to launder money and worked with officials at the Baghdad-based branch of Iran's Bank Melli to deposit funds for the IRGC-QF in Iraq. OFAC designated Bank Melli in November 2018, pursuant to E.O. 13224, for acting as a conduit for payments to the IRGC-QF which also used Bank Melli to dispense funds to Iranian-backed terrorist groups in Iraq.

Masoud Shoustaripousti is being designated pursuant to E.O. 13224 for having acted or purported to act for or on behalf of, directly or indirectly, the IRGC-QF. Mashallah Bakhtiari is being designated pursuant to E.O. 13224 for having materially assisted, sponsored, or provided financial, material, or technological support for, or goods or services to or in support of, the IRGC-QF.

AL KHAMAEL MARITIME SERVICES

Separately, OFAC is taking action against **Al Khamael Maritime Services (AKMS)**, an Iraq-based company operating out of Umm Qasr port in which the IRGC-QF has a financial interest. The IRGC-QF leveraged Shiite militia group contacts to evade Iraqi government inspection protocol at Umm Qasr port and has charged foreign companies and vessels fees for services at its terminal at the port. AKMS also worked to sell Iranian-origin petroleum products in contravention of U.S. sanctions against the Iranian regime.

AKMS is being designated pursuant to E.O. 13224 for being owned, controlled, or directed by, directly or indirectly, the IRGC-QF.

OFAC is also designating **Hasan Saburinezhad**, also known as Engineer Morteza, who is involved in the finances of AKMS. As a representative of AKMS, Saburinezhad worked to facilitate the entry of Iranian shipments into Iraqi ports for the benefit of the IRGC-QF. Saburinezhad is also involved in IRGC-QF financial and economic activities between Iran, Iraq, and Syria, including smuggling activities along the Syria/Iraq border. Saburinezhad also runs smuggling routes to help Iraqi terrorist group KH and the IRGC-QF smuggle goods into Iraq from Iran, and has assisted KH in funding the acquisition and transfer of goods out of Iran.

Saburinezhad is the Managing Director and a member of the board of directors of **Mada'in Novin Traders** (MNT), an Iran- and Iraq-based company associated with multiple IRGC-QF officials, including **Vali Gholizadeh**, who has worked with Saburinezhad for the benefit of both AKMS and MNT.

Hasan Saburinezhad is being designated pursuant to E.O. 13224 for having acted or purported to act for or on behalf of, directly or indirectly, the IRGC-QF. Mada'in Novin Traders is being designated pursuant to E.O. 13224 for being owned, controlled, or directed by, or to have acted or purported to act for or on behalf of, directly or indirectly, Saburinezhad. Gholizadeh is being designated pursuant to E.O. 13224 for being a leader or official of Mada'in Novin Traders.

OFAC is also designating **Mohammed Saeed Odhafa Al Behadili**, the Managing Director of AKMS, and **Ali Hussein Falih Al-Mansoori**, also known as Seyyed Rezvan, the company's deputy managing director and head of its board of directors. Additionally, as of 2018, Al Behadili was focused on facilitating shipments and business transactions to circumvent U.S. sanctions against the Iranian regime. Al-Mansoori has worked with IRGC-QF officials on business issues related to AKMS.

Mohammed Saeed Odhafa Al Behadili is being designated pursuant to E.O. 13224 for having acted or purported to act for or on behalf of, directly or indirectly, AKMS. Ali Hussein Falih Al-Mansoori is being designated pursuant to E.O. 13224 for being a leader or official of AKMS.

Sayyed Reza Musavifar, who is responsible for the accounts and finances of AKMS, has worked with the IRGC-QF to transfer money to terrorist militias, including KH and Lebanese Hizballah. In 2014, Musavifar transferred the equivalent of millions of dollars of foreign currency to senior IRGC-QF officials.

Musavifar is a part owner of **Middle East Saman Chemical Company**, an Iran-based company that maintained an account at Rashed Exchange, an Iran-based exchange house used to convert currency for the IRGC-QF that was designated in May 2018 for being owned or controlled by Mohammadreza Khedmati, an individual designated for support to the IRGC-QF.

Sayyed Reza Musavifar is being designated pursuant to E.O. 13224 for having materially assisted, sponsored, or provided financial, material, or technological support for, or goods or services to or in support of, the IRGC-QF. Middle East Saman Chemical Company is being designated pursuant to E.O. 13224 for being owned, controlled, or directed by, or to have acted or purported to act for or on behalf of, directly or indirectly, Sayyed Reza Musavifar.

Additionally, **Ali Farhan Asadi** is being designated pursuant to E.O. 13224 for having acted or purported to act for or on behalf of, directly or indirectly, AKMS.

SAYYED YASER MUSAVIR AND MEHDI GHASEMZADEH

IRGC-QF official **Sayyed Yaser Musavir** has been deployed to Iraq extensively since early 2014 in support of the IRGC-QF, and he has coordinated operations between the group and Iraqi terrorist militia group officials. In 2019, Musavir coordinated with IRGC-QF officials to sell Iranian petroleum products to Syria. In 2018, Musavir coordinated propaganda efforts with AAH on behalf of senior IRGC-QF officials. AAH was designated in January 2020 by the U.S. Department of State as a Foreign Terrorist Organization under section 219 of the Immigration and Nationality Act and as Specially Designated Global Terrorist (SDGT) pursuant to E.O. 13224.

Sayyed Yaser Musavir is being designated pursuant to E.O. 13224 for having acted or purported to act for or on behalf of, directly or indirectly, the IRGC-QF.

Mehdi Ghasemzadeh is an IRGC-QF official and is being designated pursuant to E.O. 13224 for having acted or purported to act for or on behalf of, directly or indirectly, the IRGC-QF.

SHAYKH 'ADNAN AL-HAMIDAWI

Shaykh 'Adnan Al-Hamidawi is a Special Operations Commander for KH who in 2019 planned to intimidate Iraqi politicians who did not support the removal of U.S. forces from Iraq. KH, an Iranian-backed terrorist militia group that has been a U.S. Department of State-designated Foreign Terrorist Organization and SDGT since 2009, receives lethal support from the IRGC-QF, and has been responsible for numerous terrorist acts against Iraqi, U.S., and Coalition forces in Iraq for over a decade, including bombings, rocket attacks, and sniper operations.

Shaykh 'Adnan Al-Hamidawi is being designated pursuant to E.O. 13224 for having acted or purported to act for or on behalf of, directly or indirectly, KH.

SANCTIONS IMPLICATIONS

As a result of today's action, all property and interests in property of these persons that are in or come within 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 and property or interests in property of blocked persons.

In addition, persons that engage in certain transactions with the persons designated today may themselves be exposed to sanctions. Furthermore, any foreign financial institution that knowingly conducted or facilitated any significant transaction on behalf of individuals and entities designated today could be subject to U.S. correspondent account or payable-through account sanctions.

Identifying information on the entities designated today.

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