U.S. DEPARTMENT OF THE TREASURY

Treasury Sanctions Network Financing Houthi Aggression and Instability in Yemen

June 10, 2021

WASHINGTON — Today, the U.S. Department of the Treasury's Office of Foreign Assets Control (OFAC) is designating members of a smuggling network that helps fund Iran's Islamic Revolutionary Guard Corps-Qods Force (IRGC-QF) and the Houthis in Yemen. Led by Iranbased Houthi financier Sa'id al-Jamal, this network generates tens of millions of dollars in revenue from the sale of commodities, like Iranian petroleum, a significant portion of which is then directed through a complex network of intermediaries and exchange houses in multiple countries to the Houthis in Yemen.

"This network's financial support enables the Houthis' deplorable attacks threatening civilian and critical infrastructure in Yemen and Saudi Arabia. These attacks undermine efforts to bring the conflict to an end and, most tragically, starve tens of millions of innocent civilians," said Director of the Office of Foreign Assets Control Andrea M. Gacki. "Ending the suffering of millions of Yemenis is of paramount concern to the United States, and we will continue to hold accountable those responsible for widespread misery and deny them access to the global financial system."

Today's action is being taken pursuant to the counterterrorism authority Executive Order (E.O.) 13224, as amended. The IRGC-QF was designated pursuant to E.O. 13224 in 2007 for support to numerous terrorist groups.

Since the onset of the conflict in Yemen, the Houthis have relied on support from the IRGC-QF to wage their campaign against the internationally recognized Yemeni government and the Saudi-led Coalition. Despite growing calls for peace, the Houthis have continued to escalate their lethal attacks inside Yemen and in the region, with dire consequences for Yemeni civilians and Yemen's neighbors. The Houthis have used ballistic missiles, explosives, naval mines, and Unmanned Aerial Vehicles to strike military targets, population centers, infrastructure, and nearby commercial shipping in Saudi Arabia, along key international trade routes.

Today, OFAC and the Department of State are also lifting sanctions on three former Government of Iran officials, and two companies formerly involved in the purchase, acquisition, sale, transport, or marketing of Iranian petrochemical products. These delistings are a result of a verified change in behavior or status on the part of the sanctioned parties and demonstrate the U.S. government's commitment to lifting sanctions in the event of a change in behavior or status for sanctioned persons.

SA'ID AL-JAMAL: FINANCIAL CONDUIT TO THE HOUTHIS

Sa'id al-Jamal, an Iran-based Houthi financial supporter, directs a network of front companies and vessels that smuggle Iranian fuel, petroleum products, and other commodities to customers throughout the Middle East, Africa, and Asia. A significant portion of the revenue generated from these sales is directed through a complex international network of intermediaries and exchange houses to the Houthis in Yemen. This revenue helps fund the destabilizing regional activities of the Houthis, IRGC-QF, and others, including Hizballah. Sa'id al-Jamal's network has generated tens of millions of dollars in revenue through the sale of Iranian commodities to those willing to evade sanctions. Sa'id al-Jamal also maintains connections to Hizballah and has worked with the group to send millions of dollars to support the Houthis.

Sa'id al-Jamal is being designated pursuant to E.O. 13224, as amended, 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.

OFAC is also identifying the Gabon-flagged vessel **Triple Success**, which has been used by Sa'id al-Jamal to smuggle Iranian petroleum products out of Iran, as property in which Sa'id al-Jamal has an interest.

SA'ID AL-JAMAL'S INTERNATIONAL SUPPORT NETWORK

A cohort of businessmen and shipping experts support Sa'id al-Jamal's network, enabling the illicit sale of Iranian goods abroad and the repatriation of profits to entities including the Houthis in Yemen, and the IRGC-QF.

Turkey-based Houthi-affiliate **Abdi Nasir Ali Mahamud**, a key business partner of Sa'id al-Jamal, acts as a financial intermediary and has coordinated the smuggling of petrochemicals for the network. Mahamud has leveraged his position as managing director of UAE-based **Adoon General Trading FZE** to facilitate the transfer of millions of dollars on behalf of Sa'id al-Jamal. Mahamud is being designated pursuant to E.O. 13224, as amended, for having materially assisted, sponsored, or provided financial, material, or technological support for, or goods or services to or in support of, Sa'id al-Jamal.

Adoon General Trading FZE and two additional companies, UAE-based **Adoon General Trading L.L.C.** and Turkey-based **Adoon General Trading Gida Sanayi Ve Ticaret Anonim Sirketi**, are being designated pursuant to E.O. 13224, as amended, for being owned, controlled, or directed by, directly or indirectly, Mahamud.

UAE-based Indian national **Manoj Sabharwal** is a maritime shipping professional who manages shipping operations for Sa'id al-Jamal's network and advises al-Jamal on smuggling Iranian oil products. Sabharwal is responsible for coordinating shipments of Iranian petroleum products and commodities throughout the Middle East and Asia while obscuring Sa'id al-Jamal's involvement. Sabharwal is being designated pursuant to E.O. 13224, as amended, for having materially assisted, sponsored, or provided financial, material, or technological support for, or goods or services to or in support of, Sa'id al-Jamal.

Hani 'Abd-al-Majid Muhammad As'ad, a Turkey-based Yemeni accountant affiliated with the Houthis, manages Sa'id al-Jamal's finances and has used multiple bank accounts to send and receive millions of dollars in payments for Sa'id al-Jamal's shipping operations, as well as to facilitate transfers to the Houthis in Yemen. As'ad is being designated pursuant to E.O. 13224, as amended, for having materially assisted, sponsored, or provided financial, material, or technological support for, or goods or services to or in support of, Sa'id al-Jamal.

Since 2017, **Jami' 'Ali Muhammad**, a Somali businessman and Houthi and IRGC-QF associate, has assisted Sa'id al-Jamal's efforts to procure vessels, facilitate shipments of Iranian fuel, and transfer funds for the benefit of the Houthis. Jami' is being designated pursuant to E.O. 13224, as amended, for having materially assisted, sponsored, or provided financial, material, or technological support for, or goods or services to or in support of, Sa'id al-Jamal.

At the direction of Sa'id al-Jamal, Turkey-based Syrian national **Talib 'Ali Husayn Al-Ahmad al-Rawi** and Greece-based Syrian national **Abdul Jalil Mallah** have facilitated transactions worth millions of dollars to **Swaid and Sons**, a Yemen-based exchange house associated with the Houthis. Sa'id al-Jamal has used Swaid and Sons to send millions of dollars to IRGC-QF officials deployed in Yemen.

Mallah has facilitated the shipment of Iranian crude oil to Syria. Mallah has worked with Sa'id al-Jamal to send millions of dollars' worth of Iranian crude oil to Hizballah. Al-Rawi has worked with Sa'id al-Jamal to transfer millions of dollars from Qatirji Group purchases of Iranian petroleum products to Swaid and Sons in Yemen. Al-Rawi, Mallah, and Swaid and Sons are being designated pursuant to E.O. 13224, as amended, for having materially assisted, sponsored, or provided financial, material, or technological support for, or goods or services to or in support of, Sa'id al-Jamal.

SANCTIONS IMPLICATIONS

All property and interests in property subject to U.S. jurisdiction of the persons designated are blocked, and U.S. persons are generally prohibited from engaging in transactions with the designated persons or their blocked property. In addition, foreign financial institutions that knowingly facilitate significant transactions for, or persons that provide material or certain other support to, the persons designated today risk exposure to sanctions that could sever their access to the U.S. financial system or block their property or interests in property under U.S. jurisdiction.

View identifying information on the individuals and entities designated today.

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