

Treasury Targets Oil Smuggling Network Generating Hundreds of Millions of Dollars for Qods Force and Hizballah

May 25, 2022

WASHINGTON — Today, the U.S. Department of the Treasury's Office of Foreign Assets Control (OFAC) is designating an international oil smuggling and money laundering network led by Islamic Revolutionary Guard Corps-Qods Force (IRGC-QF) officials that has facilitated the sale of hundreds of millions of dollars' worth of Iranian oil for both the IRGC-QF and Hizballah. This oil smuggling network, led by U.S.-designated IRGC-QF official Behnam Shahriyari and former IRGC-QF official Rostam Ghasemi and backed by senior levels of the Russian Federation government and state-run economic organs, has acted as a critical element of Iran's oil revenue generation, as well as its support for proxy militant groups that continue to perpetuate conflict and suffering throughout the region.

“The United States remains fully committed to holding the Iranian regime accountable for its support to terrorist proxies that destabilize the Middle East,” said Under Secretary of the Treasury for Terrorism and Financial Intelligence, Brian E. Nelson. “While the United States continues to seek a mutual return to full implementation of the Joint Comprehensive Plan of Action, we will not hesitate to target those who provide a critical lifeline of financial support and access to the international financial system for the Qods Force or Hizballah. In particular, the United States will continue to strictly enforce sanctions on Iran's illicit oil trade. Anyone purchasing oil from Iran faces the prospect of U.S. sanctions.”

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 on October 25, 2007 for providing support to multiple terrorist groups.

THE RUSSIAN GOVERNMENT AND IRGC-QF OIL

As early as April 2021, former IRGC-QF official Rostam Ghasemi leveraged Russia-based **RPP Limited Liability Company** (RPP LLC) — formerly managed by Afghan businessman **Kamaluddin Gulam Nabizada** — to transfer millions of dollars on behalf of the IRGC-QF from Russia.

Nabizada, the former Afghan Charge d’Affaires in Moscow, has raised funds for the IRGC-QF in coordination with senior levels of the Russian government and intelligence apparatus. Russia-based Nabizada has previously been linked to a corrupt scheme to defraud the Afghanistan-based Kabul Bank, resulting in the widespread loss of confidence in the Afghan banking sector and the loss of more than \$800 million to the Afghan government and its people.

Mihrab Suhrab Hamidi is the current manager of RPP LLC. Some of the oil sales and transport to which RPP LLC was a party while Hamidi was manager were overseen by Rostam Ghasemi.

UAE-based **Zamanoil DMCC** has also worked with the Russian government and Russian state-owned Rosneft to ship large quantities of Iranian oil to companies in Europe on behalf of the IRGC-QF.

Nabizada, Zamanoil DMCC, and RPP LLC 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, the IRGC-QF. Hamidi is being designated pursuant to E.O. 13224, as amended, for having acted or purported to act for or on behalf of, directly or indirectly, RPP LLC.

IRGC-QF FACILITATORS AND INTERLOCUTORS

Iran-based IRGC-QF associates **Mohammad Sadegh Karimian** and **Alireza Kashanimehr** help facilitate the illicit sale of Iranian oil for the IRGC-QF. Both have traveled from Iran to Turkey and worked with Shahriyari’s network to conceal the source of the proceeds from these sales. Additionally, Karimian, with the assistance of Nabizada, arranged the sale and transport of tens of thousands of tons of oil on behalf of senior IRGC-QF officials Shahriyari and Ghasemi.

Mohammad Sadegh Karimian and Alireza Kashanimehr are both 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.

Iran-based **Azim Monzavi** is an IRGC official who facilitates oil sales on behalf of the IRGC. Monzavi has worked with Shahriyari to facilitate payments for oil from Venezuelan state-owned oil and natural gas company, PDVSA.

Iran-based IRGC associate **Esam Ettehadi** has assisted in brokering and finalizing oil deals in the interest of the IRGC, some of which were customers in the People’s Republic of China

(PRC) and Russia. Monzavi and Ettehadhi have both brokered and finalized oil deals in coordination with Shahriyari and Ghasemi.

Azim Monzavi and Esam Ettehadhi 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, the IRGC-QF.

TURKEY-BASED IRGC-QF MONEY LAUNDERING NETWORK

Turkey-based IRGC-QF associates **Hakki Selcuk Sanli**, **Abdulhamid Celik**, and **Seyyid Cemal Gunduz** have worked with Shahriyari to conceal the source of proceeds from illicit Iranian oil and petrochemical sales. These transactions include the sale of Iranian petrochemicals worth more than \$6 million. Sanli, Celik and Gunduz also concealed the transfer and sale of millions of dollars' worth of gold and its equivalent in cash on behalf of the IRGC-QF.

Sanli cofounded an IRGC-associated extremist organization known as Tawhid-Salam in the 1990s, of which Celik was also a member. Tawhid-Salam received funding through close collaboration with IRGC-QF finance officials operating in Turkey. Sanli and Celik served prison sentences in Turkey for their roles in the murder of two opponents of the Iranian government. Celik also worked with Tawhid-Salam, supplying a bomb for a 2011 attack in Istanbul which injured several people.

Shahriyari has leveraged the Republic of Korea-based **Turkoca Import Export Transit Co., Ltd.** as a pass-through entity to facilitate the transfer of millions of dollars by falsifying invoices with the assistance of Celik and Turkey-based **Abdulaziz Kaskariy** who is Turkoca's sole principal.

Hakki Selcuk Sanli and Abdulhamid Celik 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, Behnam Shahriyari.

Seyyid Cemal Gunduz and Turkoca Import Export Transit Co., Ltd. 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, the IRGC-QF.

Abdulaziz Kaskariy is being designated pursuant to E.O. 13224, as amended, for being a leader or official of Turkoca Import Export Transit Co., Ltd.

HIZBALLAH FRONT COMPANY

The IRGC-QF and U.S.-designated Hizballah officials, including Muhammad Qasim al-Bazzal and Muhammad Qasir, have used Lebanon-based **Concepto Screen SAL Off-Shore** to facilitate oil deals likely benefiting the IRGC-QF and Hizballah.

Concepto Screen SAL Off-Shore 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, Hizballah.

PRC- AND HONG KONG-BASED OIL PURCHASERS AND FACILITATORS

Hong Kong-based energy company **China Haokun Energy Limited**, a subsidiary of Beijing-based **Haokun Energy Group Company Limited**, has purchased millions of barrels of Iranian oil, valued at tens of millions of dollars, from the IRGC-QF. Shahriyari brokered the sales to facilitate the transfer of funds from China Haokun to the IRGC-QF.

China Haokun Energy Limited 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. Haokun Energy Group Company Limited is being designated pursuant to E.O. 13224, as amended, for owning or controlling, directly or indirectly, China Haokun Energy Limited.

Iran-based **Petro China Pars Co.** is a joint venture between Iranian and PRC-based energy companies, with Iran's Pars Phenol Pars the majority shareholder. PRC-based **Fujie Petrochemical Zhoushan Co., Ltd.** is a subsidiary of Petro China Pars. Both companies were involved in the sale and purchase of tens of millions of dollars' worth of Iranian crude oil from the IRGC-QF, proceeds from which were laundered through Shahriyari's Turkey-based IRGC-QF associates.

PRC-based Fujie Petrochemical Zhoushan Co., Ltd., and Iran-based Petro China Pars Co. 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, the IRGC-QF.

PRC-based **Shandong Sea Right Petrochemical Co. Ltd.** has made payments related to IRGC-QF oil sales and front companies. Shandong Sea Right 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.

SANCTIONS IMPLICATIONS

As a result of today's action, all property and interests in property of the individuals and entities named above, and of any entities that are owned, directly or indirectly, 50 percent or more by them, individually, or with other blocked persons, that are in the United States or in the possession or control of U.S. persons, must be blocked and reported to OFAC. Unless authorized by a general or specific license issued by OFAC or otherwise exempt, OFAC's regulations generally prohibit all transactions by U.S. persons or within the United States (including transactions transiting the United States) that involve any property or interests in property of designated or otherwise blocked persons. The prohibitions include the making or receiving of any contribution of funds, goods, or services to or for the benefit of those persons.

Furthermore, engaging in certain transactions with the individuals and entities designated today entails risk of secondary sanctions pursuant to certain authorities, including E.O. 13224, as amended. Pursuant to E.O. 13224, OFAC can prohibit or impose strict conditions on the opening or maintaining in the United States of a correspondent account or a payable-through account of a foreign financial institution that has knowingly conducted or facilitated any significant transaction on behalf of a Specially Designated Global Terrorist.

The power and integrity of OFAC sanctions derive not only from their ability to designate and add persons to the Specially Designated Nationals and Blocked Persons (SDN) List, but also from OFAC's willingness to remove persons from the SDN List consistent with U.S. law. The ultimate goal of sanctions is not to punish, but to bring about a positive change in behavior. For information concerning the process for seeking removal from an OFAC list, including the SDN List, please refer to [OFAC's Frequently Asked Question 897](#). For detailed information on the process to submit a request for removal from an OFAC sanctions list, please see [this link](#). [Click here for information on individuals and entities designated today](#).