

Treasury Targets International Sanctions Evasion Network Supporting Iranian Petrochemical Sales

June 16, 2022

WASHINGTON — Today, the U.S. Department of the Treasury's Office of Foreign Assets Control (OFAC) sanctioned a network of Iranian petrochemical producers, as well as front companies in the People's Republic of China (PRC) and the United Arab Emirates (UAE) that support Triliance Petrochemical Co. Ltd. (Triliance) and Iran's Petrochemical Commercial Company (PCC), entities instrumental in brokering the sale of Iranian petrochemicals abroad. This network helps effectuate international transactions and evade sanctions, supporting the sale of Iranian petrochemical products to customers in the PRC and the rest of East Asia.

"The United States is pursuing the path of meaningful diplomacy to achieve a mutual return to compliance with the Joint Comprehensive Plan of Action. Absent a deal, we will continue to use our sanctions authorities to limit exports of petroleum, petroleum products, and petrochemical products from Iran," said Under Secretary of the Treasury for Terrorism and Financial Intelligence Brian E. Nelson. "The United States will continue to expose the networks Iran uses to conceal sanctions evasion activities."

Today's action is being taken pursuant to Executive Order (E.O.) 13846 and builds upon past designations of Triliance and PCC. Triliance was designated pursuant to E.O. 13846 on January 23, 2020, for facilitating the sale of Iranian petrochemical and petroleum products worth hundreds of millions of dollars from the National Iranian Oil Company (NIOC) to foreign customers, including in the PRC. PCC was identified pursuant to E.O. 13599 on November 5, 2018, for being wholly owned by the Government of Iran.

Iranian Petrochemical Producers

Iran-based **Marun Petrochemical Company (Marun Petrochemical)** is a commercial supplier of petrochemicals to Triliance. In 2021, Triliance purchased petrochemicals from Marun Petrochemical worth over \$13 million, including glycols to be shipped to the PRC. Iran-based **Kharg Petrochemical Company Limited (Kharg Petrochemical)** has sold Triliance tens of

thousands of metric tons of Iranian petrochemicals, including naphtha, butane, and propane, ultimately destined for the PRC. Iran-based **Fanavaran Petrochemical Company (Fanavaran Petrochemical)** has sold Iranian petrochemicals, including methanol, valued in the tens of millions of dollars to PCC, ultimately destined for the PRC.

Marun Petrochemical and Kharg Petrochemical are being designated pursuant to E.O. 13846 for having materially assisted, sponsored, or provided financial, material, or technological support for, or good or services in support of, Triliance, a person included on the List of Specially Designated Nationals and Blocked Persons whose property and interests in property are blocked pursuant to E.O. 13846.

Fanavaran Petrochemical is being designated pursuant to E.O. 13846 for having materially assisted, sponsored, or provided financial, material, or technological support for, or good or services in support of, PCC, a person included on the List of Specially Designated Nationals and Blocked Persons whose property and interests in property are blocked pursuant to E.O. 13599.

International Front Companies and Shipping Companies

In 2020, Hong Kong-based **Keen Well International Limited (Keen Well)** was used to process payments on behalf of Triliance for the shipment of Iranian naphtha, valued in the millions of dollars, to Singapore. Hong Kong-based Triliance front company **Teamford Enterprises Limited (Teamford)** facilitated transactions on behalf of Triliance involving the shipment of Iranian sourced petrochemicals to East Asia.

Triliance relies upon several front companies and partners in the UAE to support its operations. **GX Shipping FZE (GX Shipping)** has concealed the source of Iranian petrochemicals in order to further Triliance's business and evade sanctions. Triliance has also used front company **Future Gate Fuel and Petrochemical Trading L.L.C. (Future Gate)** to conceal its involvement in the purchase of Iranian petrochemicals valued at more than \$10 million. **Sky Zone Trading FZE (Sky Zone)** has concealed Triliance's involvement in petrochemical transactions and purchased over \$10 million worth of Iranian petrochemicals on behalf of Triliance. **Youchem General Trading FZE (Youchem)** has concealed Triliance's involvement in petrochemical transactions and received payments on behalf of Trio Energy DMCC, an OFAC-designated Triliance front company. Trio Energy DMCC was designated

pursuant to E.O. 13846 on September 3, 2020, for brokering the sales of tens of thousands of metric tons of petroleum products on behalf of Triliance.

Keen Well, Teamford, GX Shipping, Future Gate, Sky Zone, and YouChem are all being designated pursuant to E.O. 13846 for having materially assisted, sponsored, or provided financial, material, or technological support for, or good or services in support of, Triliance.

Triliance Facilitators

Jingfeng Gao, also known as Jeff Gao, is a PRC-based broker for Triliance who has been involved in multi-million-dollar transactions for Iranian petrochemicals on behalf of Triliance.

Mohammad Shaheed Ruknoddin Bhore (Bhore), an India-based Indian national, manages multiple Triliance front companies, including Dynapex Energy Limited, Petroliance Trading FZE, and YouChem. Dynapex Energy Limited was designated pursuant to E.O. 13846 on September 3, 2020, for facilitating the shipment and resale of tens of thousands of metric tons of petrochemical products worth millions of dollars on behalf of Triliance. Petroliance Trading FZE was designated pursuant to E.O. 13846 on December 16, 2020, for acting as a front company of Triliance.

Jingfeng Gao and Bhore are being designated pursuant to E.O. 13846 for having materially assisted, sponsored, or provided financial, material, or technological support for, or good or services in support of, Triliance.

Sanctions Implications

As a result of today's action, all property and interests in property of these targets that are in the United States or in the possession or control of U.S. persons must be blocked and reported to OFAC. In addition, any entities that are owned, directly or indirectly, 50 percent or more by one or more blocked persons are also blocked. OFAC's regulations generally prohibit all dealings by U.S. persons or within the United States (including transactions 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 individuals and entities designated today may themselves be exposed to sanctions or subject to an enforcement action. Furthermore, unless an exception applies, any foreign financial institution that

knowingly facilitates a significant transaction for any of the individuals or entities designated today could be subject to U.S. sanctions.

The power and integrity of OFAC sanctions derive not only from its ability to designate and add persons to the SDN List, but also from its willingness to remove persons from the SDN List consistent with the 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 [here](#). For detailed information on the process to submit a request for removal from an OFAC sanctions list, please [here](#).

[Click here for identifying information on the individuals and entities designated today.](#)

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