WASHINGTON — Today, the U.S. Department of the Treasury’s Office of Foreign Assets Control (OFAC) sanctioned an international network of individuals and entities that has used a web of Gulf-based front companies to facilitate the delivery and sale of hundreds of millions of dollars’ worth of Iranian petroleum and petrochemical products from Iranian companies to East Asia.

“While the United States is committed to achieving an agreement with Iran that seeks a mutual return to compliance with the Joint Comprehensive Plan of Action, we will continue to use all our authorities to enforce sanctions on the sale of Iranian petroleum and petrochemicals,” said Under Secretary of the Treasury for Terrorism and Financial Intelligence Brian E. Nelson.

Today’s action is being taken pursuant to Executive Order (E.O.) 13846 and follows OFAC’s June 16, 2022 designations of an international sanctions evasion network supporting Iranian petrochemical sales. Concurrently with Treasury’s designations, the Department of State imposed sanctions on five entities based in Iran, Vietnam, and Singapore and two vessels pursuant to E.O. 13846 in connection with significant transactions for the sale and transport of petroleum products from Iran, on or after November 5, 2018.

**IRANIAN OIL SANCTIONS EVADERS**

Iran-based Jam Petrochemical Company (JPC) has exported hundreds of thousands of metric tons of petrochemical products, worth hundreds of millions of dollars, to companies throughout East Asia. Many of these products were sold to Iran-based Iran Petrochemical Commercial Company (PCC) for onward shipment to the People’s Republic of China (PRC). JPC has aided PCC in facilitating the use of front bank accounts and companies in order to obfuscate the shipment and sale of Iranian origin petrochemicals. By these means, in mid to late 2021, JPC sold hundreds of thousands of metric tons of petrochemicals worth millions of dollars to PCC with the intent to deliver the goods to the PRC and the Philippines.
PCC was identified pursuant to E.O. 13599 on November 5, 2018, as being wholly owned by the Government of Iran.

Jam Petrochemical Company is being designated pursuant to E.O. 13846 for, on or after November 5, 2018, having materially assisted, sponsored, or provided financial, material, or technological support for, or goods or services in support of, Iran Petrochemical Commercial Company (PCC).

Edgar Commercial Solutions FZE has purchased and exported hundreds of millions of dollars’ worth of petrochemical products from numerous sanctioned Iranian companies, including Persian Gulf Petrochemical Industry Commercial Company (PGPICC) and Arya Sasol Polymer Company, for onward shipment to the PRC. Edgar Commercial Solutions FZE used Hong Kong-based front company Lustro Industry Limited to disguise its role in the bulk purchase of petrochemical products from PGPICC and JPC. Through Lustro Industry Limited, Edgar Commercial Solutions FZE has remitted millions of dollars to Oligei International Trading Co. Limited, a PGPICC front company, for the purchase of petrochemical products from PGPICC.

PGPICC was designated pursuant to E.O. 13382 on July 7, 2019, for being owned or controlled by Persian Gulf Petrochemical Industry Company (PGPIC). PGPIC was itself designated pursuant to E.O. 13382 that same day for having provided financial support to Khatam al-Anbiya, the engineering conglomerate of the Islamic Revolutionary Guard Corps (IRGC).

Edgar Commercial Solutions FZE, Lustro Industry Limited, and Oligei International Trading Co., Limited are being designated pursuant to E.O. 13846 for, on or after November 5, 2018, having materially assisted, sponsored, or provided financial, material, or technological support for, or goods or services in support of, PGPICC.

Treasury-designated Triliance Petrochemical Co. Ltd. (Triliance) has used its UAE-based front company Ali Almutawa Petroleum and Petrochemical Trading L.L.C (Ali Almutawa) to send and receive tens of millions of dollars’ worth of payments related to the sale and purchase of Iranian petroleum products, including gasoline and naphtha.

One of Ali Almutawa’s customers is UAE-based Petrokick LLC, which has purchased tens of millions of dollars’ worth of Iranian petroleum products from the company. Petrokick LLC has also purchased millions of dollars’ worth of oil products from Behran Oil for onward shipment to the UAE. Petrokick LLC has sold hundreds of millions of dollars’ worth of Iranian oil products shipped to the UAE.
Triliance was designated pursuant to E.O. 13846 on January 23, 2020, for, on or after November 5, 2018, having materially assisted, sponsored, or provided financial, material, or technological support for, or goods or services in support of the National Iranian Oil Company (NIOC).

Behran Oil was designated pursuant to E.O. 13876 for being owned or controlled by, directly or indirectly, Bonyad Mostazafan, a business empire owned by the Supreme Leader and designated pursuant to E.O. 13876.

Ali Almutawa Petroleum and Petrochemical Trading L.L.C is being designated for, on or after November 5, 2018, having materially assisted, sponsored, or provided financial, material, or technological support for, or goods or services in support of, Triliance. Petrokick LLC is being designated for, on or after November 5, 2018, having materially assisted, sponsored, or provided financial, material, or technological support for, or goods or services in support of, Behran Oil.

**CRUDE OIL AND PETROCHEMICAL EXPORTERS**

Since 2019, UAE-based Iranian nationals Morteza Rajabieslami (Rajabieslami) and Mahdieh Sanchuli (Sanchuli) have partnered to export Iranian crude oil and petrochemical products on behalf of Switzerland-based Naftaran Intertrade Company (NICO), the marketing arm of NIOC, through companies and vessels under their control. Rajabieslami owns an extensive network of companies engaged in refining, energy trading, shipping, and bunkering, which have facilitated the shipment of thousands of metric tons of fuel oil worth millions of dollars from Iran. These companies have been involved in contracts valued in the tens of millions of dollars related to the sale of petroleum products from NICO.

Sanchuli, an experienced petroleum sales facilitator who has served as a representative of UAE-based companies Petrogat FZE and Emerald Global FZE, has purchased from NICO shipments of crude oil worth tens of millions of dollars. Sanchuli has paid NICO tens of millions of dollars on behalf of Petrogat FZE to facilitate multiple shipments of oil from Iran to East Asia for the benefit of NICO.

NICO was identified pursuant to E.O. 13599 on November 26, 2008, for being owned or controlled by the Government of Iran.

Morteza Rajabieslami, Mahdieh Sanchuli, Petrogat FZE, and Emerald Global FZE are being designated pursuant to E.O. 13846 for, on or after November 5, 2018, having materially
assisted, sponsored, or provided financial, material, or technological support for, or goods or services in support of, NICO.

**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 list of Special Designated Nationals and Blocked Persons (“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. For detailed information on the process to submit a request for removal from an OFAC sanctions list.

For identifying information on the individuals and entities designated today.

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