U.S. DEPARTMENT OF THE TREASURY

Treasury Sanctions Oil Shipping Network Supporting IRGC-QF and Hizballah

November 3, 2022

WASHINGTON – Today, the U.S. Department of the Treasury's Office of Foreign Assets Control (OFAC) designated members of an international oil smuggling network that facilitated oil trades and generated revenue for Hizballah and the Islamic Revolutionary Guard Corps-Qods Force (IRGC-QF). The network being designated today includes several key individuals and numerous front companies and vessels involved in blending oil to conceal the Iranian origins of the shipments and exporting it around the world in support of Hizballah and the IRGC-QF.

"The individuals running this illicit network use a web of shell companies and fraudulent tactics including document falsification to obfuscate the origins of Iranian oil, sell it on the international market, and evade sanctions," said Under Secretary of the Treasury for Terrorism and Financial Intelligence Brian E. Nelson. "Market participants should be vigilant of Hizballah and the IRGC-QF's attempts to generate revenue from oil smuggling to enable their terrorist activities around the world."

OFAC is designating this complex network of facilitators, front companies, and vessels under Executive Order (E.O.) 13224, as amended, which targets terrorists, terrorist organizations, leaders and officials of terrorist groups, and those providing support to terrorists or acts of terrorism. Today's action follows OFAC's May 25, 2022 designations of another Iranian oil smuggling network, which was 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.

SUPPORT FOR HIZBALLAH AND THE IRGC-QF

As of mid-2022, a Gulf-based network of individuals and companies were blending and exporting Iranian oil in support of Hizballah and the IRGC-QF. **Viktor Artemov, Edman Nafrieh, Rouzbeh Zahedi**, and **Mohamed El Zein** leveraged dozens of companies under their control to conduct the network's illicit activities. The network used storage units in the Port of Sharjah the United Arab Emirates, and blended products of Indian origin with Iranian oil to obfuscate

the Iranian origin. The companies then modified or created counterfeit certificates of origin and quality for the blended oil, which was then transferred for sale abroad.

Iranian national **Edman Nafrieh** (Nafrieh) oversaw a network of dozens of companies that supported the network's illegal blending and exportation of Iranian oil in support of Hizballah and the IRGC-QF. Nafrieh received orders from high-ranking Iranian officials associated with the U.S.-designated Iranian Supreme Leader's Office to direct the network's oil smuggling operation profits to companies and bank accounts associated with Hizballah and the IRGC-QF. Nafrieh is the CEO and Chairperson of **Gilda Tar Karvan International Company.**

Iranian national **Rouzbeh Zahedi** (Zahedi) also worked with the network to help transport the Iranian oil abroad and procure funds on behalf of Hizballah and the IRGC-QF. Zahedi used his companies to transfer funds to IRGC-QF and Hizballah members and coordinated activities closely with **Mohamed El Zein** (El Zein), a Hizballah member who was also part of the oil smuggling network and the son of a high-ranking Hizballah communications director. El Zein used forged invoices for consulting and shipping services from shell companies to hide the origin of financial transactions.

Viktor Artemov (Artemov) oversees much of this vast network of cover companies and shipping services to receive, conceal, and sell oil. Artemov and his associates used their network to illegally transport Iranian oil abroad and procure funds on behalf of Hizballah and the IRGC-QF. Artemov used his companies to buy and sell oil tankers that were then used to transport blended Iranian oil on behalf of the oil smuggling network. Artemov also planned oil sales to Asia-based buyers as of late 2021 with Muhammad Ibrahim Bazzi, a key Hizballah financier who was designated by OFAC in May 2018 for providing material support to Hizballah.

Viktor Artemov, Edman Nafrieh, Rouzbeh Zahedi, and Mohamed El Zein 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, both Hizballah and the IRGC-QF. Gilda Tar Karvan International Company is being designated pursuant to E.O. 13224, as amended, for being owned or controlled by Edman Nafrieh.

ARTEMOV'S SHIPPING COMPANIES CRITICAL TO OIL SMUGGLING NETWORK

Artemov oversees a vast, complex, and interwoven global network of front companies that are used to facilitate oil shipments on behalf of the oil smuggling network. As of 2022, Artemov

managed **Ava Petroleum** and used it to help sell illicit oil. Artemov is also a director and 50 percent owner of **Petro Naviero**, which through numerous subsidiaries had control of several vessels that were used for illicit oil shipments, including the **Julia A, Bueno, Bluefins, Boceanica, B Luminosa, Lara I, Adisa, Nolan**, and **Zephyr I**. Artemov's network often used vessels flagged in jurisdictions less attentive to ship tracking system inactivity to avoid scrutiny from U.S. authorities. Artemov and his network have registered companies in the Marshall Islands, Mauritius, and Singapore in an effort to obscure their involvement in the sale and transportation of Iranian oil.

Artemov also managed **Centrum Maritime** as of 2022, a company whose shares are held by another individual in a trust for Artemov. Artemov was involved in authorizing both the purchase and sale of oil tankers worth as much as \$30 million on behalf of the company, which were used to transport oil for the oil smuggling network, including the Bueno, which was used by Edman Nafrieh.

Energotrade Plus DMCC, Intrepid Navigators, and Rising Tide Shipping are also companies owned or managed by Artemov. As of early 2021, Artemov was the sole shareholder of Energotrade Plus DMCC. As of 2022, Artemov's shell company Centrum Maritime wholly owned Intrepid Navigators, and was incorporated by Artemov's employees. As of 2022, Rising Tide is a subsidiary of Intrepid Navigators. Artemov and his associates recently used both offshore companies to reinvest funds from the oil smuggling operations into the acquisition of new vessels to increase the network's fleet.

Artemov leverages all of these companies to transfer and obfuscate ownership of vessels involved in the illicit oil smuggling network. In May 2022, Artemov conferred with an associate about possibly changing the ownership of the Zephyr I to another shell company. At that time, both Artemov and his company, Petro Naviero, owned significant shares of the Zephyr I. In March 2022, Artemov authorized his company, Centrum Maritime, to purchase the Zephyr I for over \$11 million. In April 2022, Artemov authorized the sale of the Zephyr I to another shell company partially owned by Centrum Maritime.

Ava Petroleum Services S.A., Petro Naviero Pte Ltd, Centrum Maritime Pte Ltd, Energotrade Plus DMCC, Intrepid Navigators SA, and Rising Tide Shipping Corp. are being designated for being owned, controlled, or directed by Artemov.

Artemov leverages several shipping management companies and vessels to support the network's activities. **Monumont Ship Management Limited** manages several ships owned and/or managed by Artemov, including the Zephyr I, Boceanica, and Julia A. Artemov's companies.

Ava Petroleum handled payments for oil transported on ships managed by Monumont Ship on multiple occasions since early 2022. **Harbour Ship Management Limited** owns the Bluefins, the B Luminosa, and the Bueno, and it operates the Boceanica. As of mid-2021, Artemov likely owned about 80 percent of the shares of the Boceanica, a vessel worth approximately \$7.5 million. Meanwhile, **Expanse Ship Management Limited** serves as the technical manager for the Bueno and Bluefins and served as the technical manager and International Safety Management manager for the B Luminosa previously. **Blue Berri Shipping Incorporated** owns one oil tanker, the **Rain Drop**. In July 2022, the Rain Drop conducted a ship-to-ship transfer with another tanker under the control of Ava Petroleum. Artemov has used these vessels, including the Zephyr I, Boceanica, Julia A, Bluefins, B Luminosa, and the Bueno to move oil on behalf of the network.

Monumont Ship Management Limited, Harbour Ship Management Limited, Expanse Ship Management Limited, and Blue Berri Shipping Incorporated are being designated for having materially assisted, sponsored, or provided financial, material, or technological support for, or goods or services to or in support of, Artemov. The Zephyr I and the Boceanica are property in which Artemov has an interest. The Bueno, Bluefins, and B Luminosa are property in which Harbour Ship Management Limited has an interest. The Rain Drop is property in which Blue Berri Shipping Incorporated has an interest.

Al Hakeel Al Aswad Oil Trading LLC (Al-Hakeel) was also used by the oil smuggling network to facilitate its illicit oil shipments. The delivery of Iranian oil was managed through Artemov's partner, Edman Nafrieh and his front company, Al Hakeel, which sold the Iranian oil to Artemov's shell companies Centrum Maritime and Ava Petroleum. As of mid-2022 Centrum Maritime had purchased approximately 400,000 barrels of crude oil from Al-Hakeel. Previously, another of Artemov's shell companies planned to purchase 2 million barrels of oil from Al-Hakeel, and Ava Petroleum coordinated the purchase. Artemov associate El Zein was also involved in coordinating the purchase of crude from Al Hakeel.

Al Hakeel 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, Viktor Artemov.

Pontus Navigation Corp. and **Triton Navigation Corp.** are subsidiaries of Centrum Maritime and are also companies Artemov uses to arrange ownership of oil vessels. Artemov served as director of Pontus Navigation Corp. and Triton Navigation Corp., which owned the **Nolan** and

Adisa, respectively. Artemov's company Rising Tide Shipping served as the commercial manager of the Nolan and Adisa.

Pontus Navigation Corp. and Triton Navigation Corp. 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, Artemov. The Nolan is being identified as property in which Pontus Navigation Corp. has an interest, and the Adisa is being identified as property in which Triton Navigation Corp. has an interest.

Technology Bright is incorporated in the Marshall Islands and owns one vessel, the **Young Yong**, which is flagged in Djibouti. The captain of the oil tanker **Young Yong** falsified the ship's location data, and updated Artemov and other Ava Petroleum employees on the ship's status and its loading of approximately 1.8 million barrels of oil.

Technology Bright 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, Artemov. The Young Yong is being identified as blocked property in which Technology Bright has an interest.

Azul Vista Shipping Corporation is a shell company incorporated in the Marshall Islands and which owns one vessel, the Liberia-flagged **Julia A**, which is managed by Monumont Ship Management. As of mid-2021, Viktor Artemov's Ava Petroleum coordinated an oil shipment to China on the Julia A. The payment and contractual obligations for the shipment were with Ava Petroleum, with Artemov acting on behalf of the company. Similarly, the **Vista Clara Shipping Corporation** is incorporated in the Marshall Islands and owns one Liberia-flagged vessel, the **Lara I**, which is also managed by Monumont Ship Management Limited. Artemov used the Lara I to transport oil on behalf of the oil smuggling network. As of early 2022, Artemov's Ava Petroleum paid two invoices, totaling over \$3.3 million, for marine fuel for two tankers, one of which was the Lara I, which were both involved in transporting sanctioned oil and conducting illicit ship to ship transfers near Singapore.

Azul Vista Shipping Corporation and Vista Clara Shipping Corporation 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, Artemov. The Julia A is being identified as blocked property in which Azul Vista Shipping Corporation has an interest, and the Lara I is being identified as blocked property in which Vista Clara Shipping Corporation has an interest.

Corporate Officials and Employees

Tatiana Ryabikova (Ryabikova) 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, Artemov. As of 2022, Ryabikova was an employee of Artemov, and was involved in coordinating financial activities for Artemov and his companies and managing the incorporation of his companies. She also helped facilitate the purchase of vessels and the charter of other vessels for Artemov.

Gregorio Fazzone (Fazzone) is being designated pursuant to E.O. 13224, as amended, for being a leader or official of Ava Petroleum Services. Fazzone is the sole member of the board of directors and CEO of Ava Petroleum.

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.

Furthermore, engaging in certain transactions with the individuals and entities designated today entails risk of secondary sanctions pursuant to E.O. 13224, as amended. Pursuant to this authority, 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 knowingly conducted or facilitated any significant transaction on behalf of a Specially Designated Global Terrorist.

For information concerning the process for seeking removal from an OFAC list, including the Specially Designated Nationals and Blocked Persons List, please refer to OFAC's Frequently Asked Question 897 here. Additional information regarding sanctions programs administered by OFAC can be found here.

The power and integrity of OFAC sanctions derive not only from the ability to designate and add persons to the SDN List, but also the 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 click here.

View identifying information on the individuals and entities designated today.

###

