

U.S. DEPARTMENT OF THE TREASURY

Treasury Sanctions Procurement Network Supporting Iran's UAV and Military Programs

April 19, 2023

WASHINGTON — Today, the U.S. Department of the Treasury's Office of Foreign Assets Control (OFAC) designated one individual and six entities in a sanctions evasion network that has facilitated Iran's procurement of electronic components for its destabilizing military programs, including those used in unmanned aerial vehicles (UAVs). Particularly, this action targets the head of U.S.-designated Iran's Pardazan System Namad Arman (PASNA), and the entity's Iran-, Malaysia-, Hong Kong-, and PRC-based front companies and suppliers that have enabled PASNA's procurement of goods and technology. This action also updates the OFAC Specially Designated Nationals and Blocked Persons List (SDN List) entry for PASNA to include an alias and the names of two fictitious companies used by PASNA in its procurement efforts.

Iran's proliferation of UAVs and other weapons continues to destabilize the Middle East region and beyond. Since September 2022, OFAC has issued several rounds of designations targeting Iran's UAV and missile programs, to include elements involved in [production](#), [procurement](#), and [proliferation](#).

"The network sanctioned today has procured goods and technology for the Iranian government and its defense industry and UAV program," said Under Secretary of the Treasury for Terrorism and Financial Intelligence Brian E. Nelson. "Treasury will continue to enforce its sanctions against Iran's military procurement efforts that contribute to regional insecurity and global instability."

On January 12, 2018, [OFAC designated PASNA](#) pursuant to E.O. 13382, which targets weapons of mass destruction proliferators and their supporters for having provided, or attempted to provide, financial, material, technological, or other support for, or goods or services in support of, Iran Electronics Industries (IEI), which is subordinate to Iran's Ministry of Defense and Armed Forces Logistics (MODAFL).

PASNA'S IRAN-BASED PROCUREMENT NETWORK

Iranian national **Mehdi Khoshghadam** is the managing director of PASNA and is responsible for the company's sanctions evasion efforts. Using numerous front companies, Khoshghadam has sought a variety of electronic components from foreign suppliers primarily based in the People's Republic of China (PRC). Khoshghadam is designated pursuant to E.O. 13382 for acting or purporting to act for or on behalf of, directly or indirectly, PASNA, a person whose property and interests in property are blocked pursuant to E.O. 13382.

PASNA uses a mix of front companies and aliases when conducting business with foreign suppliers. The front companies include **Amv AJ Nilgoun Bushehr CO. (AMV AJ)** and **PASNA International SDN. BHD. (PASNA International)**.

AMV AJ is an Iran-based front company for PASNA. Khoshghadam has used AMV AJ to procure electronic goods for PASNA, including electrical components and connectors.

PASNA International is a Malaysia-based PASNA front company that has procured goods for PASNA, including encoder boards, copiers, transmitters, remote controls, optical components, and various crystals.

AMV AJ, and PASNA International are designated pursuant to E.O. 13382 for having provided, or attempted to provide, financial, material, technological, or other support for, or goods or services in support of, PASNA, a person whose property and interests in property are blocked pursuant to E.O. 13382.

OFAC is updating PASNA's SDN List entry to include its alias, **Faraz Tejarat Ertebat Company**. In addition, OFAC is exposing PASNA and Khoshghadam's use of two fictional companies in their sanctions evasion efforts by adding the names as aliases on PASNA's SDN List entry. These names are **Sino Trader Co.** and **Pouyan Electronic Co.**

PASNA'S SUPPLIERS

Arttronix International (HK) Limited (Arttronix) is a Hong Kong-based company that has supplied electronic components to PASNA through Khoshghadam. Arttronix uses its alias, Aderal Industrial (HK) Ltd., to conduct business. Arttronix has supplied a number of different electronic goods to PASNA.

Jotrin Electronics Limited (Jotrin) is a PRC-based PASNA supplier. Jotrin has supplied PASNA components through Khoshghadam and PASNA's front company AMV AJ, including microelectromechanical systems and accelerometers.

Vohom Technology (HK) CO., Limited (Vohom) is a PRC-based PASNA supplier. Vohom has supplied electronic goods to PASNA through Khoshghadam.

Yinke (HK) Electronics Company Limited (Yinke) is also a PRC-based PASNA supplier. On multiple occasions, Yinke has supplied PASNA, through Khoshghadam, foreign manufactured electronic components.

Arttronix, Jotrin, Vohom, and Yinke are designated pursuant to E.O. 13382 for having provided, or attempted to provide, financial, material, technological, or other support for, or goods or services in support of, PASNA, a person whose property and interests in property are blocked pursuant to E.O. 13382.

SANCTIONS IMPLICATIONS

As a result of today's action, all property and interests in property of the individual and entities mentioned above 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. 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 blocked or designated persons are prohibited.

In addition, persons that engage in certain transactions with the individuals or entities designated today may themselves be exposed to sanctions. Furthermore, any foreign financial institution that knowingly facilitates a significant transaction or provides significant financial services for any of the individuals or entities designated today pursuant to E.O. 13382 could be subject to U.S. sanctions.

The power and integrity of OFAC sanctions derive not only from OFAC's 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 [FAQ 897](#).

[For identifying information on the individual and entities designated today, click here.](#)

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