WASHINGTON — Today, the U.S. Department of the Treasury’s Office of Foreign Assets Control (OFAC) is designating the Iran-based technology company known as “Arvan Cloud,” two senior employees of Arvan Cloud, and an affiliated company based in the United Arab Emirates for their roles in facilitating the Iranian regime’s censorship of the Internet in Iran.

Arvan Cloud is a key partner of Iran’s Information and Communications Technology Ministry in the development of the National Information Network (NIN), a countrywide intranet that is being used to disconnect the Iranian people from the global Internet. Arvan Cloud has a close relationship with Iran’s intelligence services, including the Ministry of Intelligence and Security (MOIS), and Arvan Cloud executives have extensive ties to senior Iranian government officials. The Iranian government has regularly used Internet restrictions and the throttling of Internet speeds to suppress dissent, surveil and punish Iranians for exercising their freedom of expression and assembly both online and offline, and limit the dissemination to the international community of credible information about egregious human rights violations.

“Free and unrestricted access to information is a fundamental right of all peoples, including in Iran,” said Under Secretary of the Treasury for Terrorism and Financial Intelligence Brian E. Nelson. “The United States is committed to holding accountable those who seek to undermine freedom of expression and suppress dissent, and to call out regimes who deny their citizens this right.”

Today’s action is being taken pursuant to Executive Order (E.O.) 13846, which authorizes sanctions on persons who engage in censorship or other activities with respect to Iran. In addition, OFAC is issuing a time-limited general license to allow the wind down of transactions with Arvan Cloud. Today’s action is consistent with the U.S. government’s continued support for the Iranian people’s ability to freely access information both offline and online such as through the provision of Internet communication tools to the people of Iran, including under Iran General License D-2. Please also see FAQs 1087 and 1088 for information about the provision of cloud services for the Iranian people.
Navyan Abr Arvan Private Limited Company, known as Arvan Cloud, has played a prominent role in the Iranian government’s development of the NIN infrastructure, a censored version of the Internet under the control of Iranian authorities. The government has responded to the protests that began at the end of 2022 following the death of Mahsa Jina Amini, as well as previous rounds of protests, with significant Internet disruptions and restrictions, in addition to mobile network shutdowns and curfew-style disturbances. The Iranian regime has sought to move domestic Internet traffic to the NIN in an effort to mitigate the billions of dollars in lost economic activity it incurs when it imposes internet restrictions to suppress dissent. As a web-hosting service and content delivery network, Arvan Cloud has helped lay the groundwork for the NIN’s integrated cloud network infrastructure. In contracts with the Ministry of Information and Communications Technology (ICT), Arvan Cloud has explicitly agreed to provide interception for the government, allowing Iranian authorities to control and censor incoming and outgoing traffic and surveil data on the servers. Arvan Cloud has also blocked websites at the request of Iran’s Committee to Determine Instances of Criminal Content (CDICC), a government entity previously designated by the United States pursuant to E.O. 13628 for its role in monitoring online content and playing a major role in the filtering of websites deemed to be against the regime’s national beliefs and safety.

Arvan Cloud maintains a close relationship to Iran’s Ministry of Intelligence and Security (MOIS), and senior managers of Arvan Cloud are either current or former affiliates of MOIS. Former MOIS officials have also publicly encouraged the use of Arvan Cloud services.

Arvan Cloud is being designated pursuant to E.O. 13846 for having engaged in censorship or other activities with respect to Iran on or after June 12, 2009, that prohibit, limit, or penalize the exercise of freedom of expression or assembly by citizens of Iran, or that limit access to print or broadcast media, including the facilitation or support of intentional frequency manipulation by the Government of Iran or an entity owned or controlled by the Government of Iran that would jam or restrict an international signal.

Pouya Pirhosseinloo (Pirhosseinloo) and Farhad Fatemi (Fatemi) are the co-founders of Arvan Cloud and serve as the CEO and the tech lead and senior site reliability engineer, respectively.

ArvanCloud Global Technologies L.L.C. is a Dubai-based affiliate of Arvan Cloud that provides cloud services on behalf of Arvan Cloud and provides a bridge for Arvan Cloud’s connection to the global internet. Arvan Cloud senior executives and employees, including Pirhosseinloo and Fatemi, manage, maintain, and act as administrative points of contact for ArvanCloud Global Technologies L.L.C.’s domain and IP addresses.
Pirhosseinloo and Fatemi are being designated pursuant to E.O. 13846 for having acted or purported to act for or on behalf of, directly or indirectly, Arvan Cloud. Arvancloud Global Technologies L.L.C is being designated pursuant to E.O. 13846 for being owned or controlled by, or having acted or purported to act for or on behalf of, directly or indirectly, Arvan Cloud.

SANCTIONS IMPLICATIONS

As a result of today’s action, all property and interests in property of these persons 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 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 persons 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 or provides significant financial services for any of the persons designated today 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 Specially Designated Nationals and Blocked Persons List (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.

Click here for identifying information on the individuals designated today.

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