Treasury Sanctions Multinational Network Supporting Iran's UAV and Military Aircraft Production

September 19, 2023

WASHINGTON — Today, the U.S. Department of the Treasury's Office of Foreign Assets Control (OFAC) sanctioned seven individuals and four entities based in Iran, the People's Republic of China (PRC), Russia, and Türkiye in connection with Iran's unmanned aerial vehicle (UAV) and military aircraft development. This network has facilitated shipments and financial transactions in support of the U.S.-designated Iran Aircraft Manufacturing Industrial Company's (HESA's) UAV and military aircraft production, procurement, and maintenance activities. OFAC is also updating HESA's entry on the Specially Designated Nationals and Blocked Persons (SDN) List to include its new alias which it has used to evade sanctions and export control measures.

"Iran's continued, deliberate proliferation of its UAVs enables Russia, its proxies in the Middle East, and other destabilizing actors to undermine global stability," said Under Secretary of the Treasury for Terrorism and Financial Intelligence Brian E. Nelson. "The United States will continue to take action against Iran's UAV procurement networks, and encourages jurisdictions to exercise the due diligence necessary to prevent the export of these components to Iran."

Today's action builds on OFAC's March 9, 2023 designation of five PRC-based companies and one individual responsible for the sale and shipment of thousands of aerospace components, including those with UAV applications, to HESA. Today's action is taken pursuant to Executive Order (E.O.) 13382, which targets proliferators of weapons of mass destruction or their means of delivery and their supporters.

HESA'S NEW ALIAS

HESA manufactures Iran's Ababil- and Shahed-series UAVs. It was designated pursuant to E.O. 13382 on September 17, 2008 for being owned or controlled by Iran's Ministry of Defense and Armed Forces Logistics (MODAFL) and for having provided support to Iran's Islamic Revolutionary Guard Corps (IRGC). As of 2022, HESA has used the name **Shahin Co.** in

contracts with overseas-based suppliers in an apparent effort to evade U.S. sanctions and export controls. Because HESA continues to procure sensitive UAV components under this name, OFAC is updating HESA's entry on the SDN List to include Shahin Co. as an alias.

HESA'S MANAGEMENT

Iran-based **Mehdi Gogerdchian** (**Gogerdchian**) serves as HESA's current managing director and as a member of the firm's board of directors. Gogerdchian has overseen HESA's UAV testing and represented the firm in its contracts with foreign suppliers. Iran-based **Hamidreza Noori** (**Noori**) serves as HESA's vice chairperson of the board of directors and previously held the role of managing director. Noori has represented HESA in its procurement of aerospace components and coordinated HESA's cooperation with foreign countries. Iran-based **Husayn A'ini** (**A'ini**) serves as HESA's Director of UAV Manufacturing and has overseen the firm's UAV testing in Syria.

Gogerdchian, Noori, and A'ini are being designated pursuant to E.O. 13382 for acting or purporting to act for or on behalf of, directly or indirectly, HESA.

PRC-BASED SUPPLIERS

PRC-based **Shenzhen Jiasibo Technology Co., Ltd.** (**Shenzhen Jiasibo**) is operated by U.S.-designated HESA supplier Yun Xia Yuan (Yun). Yun has used Shenzhen Jiasibo, in conjunction with her other U.S.-designated firms, S&C Trade PTY Co., Ltd. (S&C Trade) and Shenzhen Caspro Technology Co., Ltd. (Shenzhen Caspro), to facilitate the supply of aerospace-grade radar altimeter systems, GPS and VHF antennas, sensors, and other hardware with possible UAV applications to HESA. PRC-based **Su Chunpeng** (**Su**) serves as the managing director and owner of Shenzhen Jiasibo. S&C Trade and Shenzhen Caspro were designated pursuant to E.O. 13382 on March 9, 2023, for having provided, or attempted to provide, financial, material, technological, or other support for, or goods or services in support of, HESA. Yun was designated pursuant to E.O. 13382 on March 9, 2023, for acting or purporting to act for or on behalf of, directly, or indirectly, S&C Trade.

As director and controlling shareholder of PRC-based Guilin Alpha Rubber and Plastics Technology Co., Ltd (Guilin Alpha), PRC-based **Dong Wenbo** (**Dong**) has represented Guilin Alpha in the sale of aircraft brake disks to HESA. Guilin Alpha — which has facilitated the sale and shipment of thousands of aerospace components worth over a million dollars to HESA — was designated pursuant to E.O. 13382 on March 9, 2023 for having provided, or attempted to

provide, financial, material, technological, or other support for, or goods or services in support of, HESA.

Shenzhen Jiasibo is being 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, HESA. Su is being designated pursuant to E.O. 13382 for acting or purporting to act for or on behalf of, directly or indirectly, Shenzhen Jiasibo. Dong is being designated pursuant to E.O. 13382 for acting or purporting to act for or on behalf of, directly or indirectly, Guilin Alpha.

RUSSIA-BASED SUPPLIERS AND CONTRACTORS

Russia-based **Delta-Aero Technical Service Center LLC** (**Delta-Aero**) has supplied propellers and tires to HESA for its AN-140 aircraft, which HESA has outfitted for military use. Russia-based **Joint Stock Company Scientific Production Enterprise Aerosila** (**JSC SPE Aerosila**) has performed ground and flight tests for HESA and facilitated the supply of auxiliary power units for the Iran-based firm. Russia-based **Joint Stock Company Star** (**JSC Star**) has contracts with HESA to overhaul components of HESA's AN-140 aircraft.

Delta-Aero, JSC SPE Aerosila, and JSC Star are being 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, HESA.

TÜRKIYE-BASED FINANCIAL FACILITATORS

Türkiye-based money exchangers **Mehmet Tokdemir** (**Tokdemir**) and **Alaaddin Aykut** (**Aykut**) have facilitated U.S. dollar- and euro-denominated financial transactions worth hundreds of thousands of dollars in support of HESA's procurement from various suppliers, including PRC-based Hanghzou Fuyang Koto Machinery Co., Ltd. (Koto Machinery). Koto Machinery — which facilitated the sale and shipment of light aircraft engines applicable for Iran's Shahed-series UAVs to HESA — was designated pursuant to E.O. 13382 on March 9, 2023, for having provided, or attempted to provide, financial, material, technological, or other support for, or goods or services in support of, HESA.

Tokdemir and Aykut are being 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, HESA.

9/19/2023

SANCTIONS IMPLICATIONS

As a result of today's action, all property and interests in property of the individuals and entities 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 U.S. 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 individuals and entities designated today, click here.

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