

Treasury Sanctions Actors Supporting Iran's Missile and UAV Programs

October 18, 2023

WASHINGTON — Today, the U.S. Department of the Treasury's Office of Foreign Assets Control (OFAC) sanctioned 11 individuals, eight entities, and one vessel based in Iran, Hong Kong, the People's Republic of China (PRC), and Venezuela that are enabling Iran's destabilizing ballistic missile and unmanned aerial vehicle (UAV) programs. The persons designated today have materially supported Iran's Islamic Revolutionary Guard Corps (IRGC), Ministry of Defense and Armed Forces Logistics (MODAFL), or their subordinates in the production and proliferation of missiles and UAVs.

"Iran's reckless choice to continue its proliferation of destructive UAVs and other weapons prolongs numerous conflicts in regions around the world," said Under Secretary of the Treasury for Terrorism and Financial Intelligence Brian E. Nelson. "The United States will continue to take action to disrupt Iran's proliferation of UAVs and other weapons to oppressive regimes and destabilizing actors, and we encourage the international community to do the same."

Today's action is taken as the UN's restrictions on Iran's missile-related activities under UN Security Council Resolution 2231 (UNSCR 2231) expire, and the European Union acts to retain the nuclear, conventional arms, and missile-related restrictions on Iran set to expire today under its nonproliferation sanctions regime. Despite the expiration of UNSCR 2231, the United States remains steadfast in its commitment to counter the threat posed by Iran's procurement, development, and proliferation of missiles, UAVs, and other military weapons.

Additionally, in coordination with the U.S. Departments of State, Commerce, and Justice, we are issuing new public guidance to private industry regarding Iranian missile procurement and related U.S. sanctions and export restrictions.

OFAC is taking this action jointly with the Department of State, which is designating eight individuals and entities related to Iran's missile, conventional arms, and UAV activities.

OFAC's action today is being taken pursuant to Executive Order (E.O.) 13382 ("Blocking Property of Weapons of Mass Destruction Proliferators and Their Supporters") and E.O. 13949 ("Blocking Property of Certain Persons With Respect to the Conventional Arms Activities of Iran").

MISSILE, UAV, AND OTHER WEAPONS PROCUREMENT

Iran-based **Fanavaran Sanat Ertebatat Company (FSE)** produces jam-resistant guidance systems for Iran's Islamic Revolutionary Guard Corps Aerospace Force Self-Sufficiency Jihad Organization (IRGC ASF SSJO), an organization involved in Iranian ballistic missile research and flight test launches. FSE also has contracts with the IRGC ASF SSJO to supply other electronic components. Iran-based **Armin Ghorsi Anbaran (Anbaran)** and **Hossein Hemsî (Hemsî)** are the two directors and shareholders of FSE, each with a 50 percent stake in the company. The IRGC ASF SSJO was designated pursuant to E.O. 13382 by the U.S. Department of State on July 18, 2017.

FSE 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, the IRGC ASF SSJO. Anbaran and Hemsî are being designated pursuant to E.O. 13382 for acting or purporting to act for or on behalf of, directly or indirectly, FSE.

Saberin Kish Company (Saberin Kish), an Iran-based, IRGC-owned company, procured components for the IRGC to repair lawful intercept and technical equipment. Additionally, Saberin Kish provided support for the installation and maintenance of information technology software and hardware for the IRGC. **Alireza Matinkia (Matinkia)**, an Iran-based procurement agent, facilitated the shipment of Japan- and U.S.-origin, dual-use electronic components from Hong Kong to Iran in support of Saberin Kish's procurement activities. Matinkia also coordinated the purchase of U.S.-origin electronic parts for Saberin Kish using a China-based intermediary.

Saberin Kish is being designated pursuant to E.O. 13382 for being owned or controlled by, or acting or purporting to act for or on behalf of, directly or indirectly, the IRGC. Matinkia 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, Saberin Kish.

On various occasions, China-based **Lin Jinghe**, also known as Gary Lam, procured U.S.-, Japanese-, Swiss-, Taiwanese-, and UK-origin, dual-use circulators, amplifiers, inductors, and other electronic components for Matinkia using his Hong Kong-based company **Nanxigu**

Technology Co., Limited (Nanxigu). Hong Kong-based **Dali RF Technology Co., Limited (Dali RF)** was used on multiple occasions to receive financial transfers related to Lin Jinghe's electronic procurement activities for Iranian customers. Dali RF was also used by Matinkia to source UAV accessories and U.S.-origin aviation components.

Lin Jinghe and Nanxigu 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, Matinkia. Dali RF 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, Lin Jinghe.

Electro Optic Sairan Industries Co. (SAPA), an Iranian company that is a subsidiary of Iran Electronics Industries (IEI), procured military equipment and developed technologies for MODAFL and the Iranian Regular Forces. Furthermore, SAPA contributes to the development of the Shahed-129 UAV for Iran's Shahed Aviation Industries Research Center (SAIRC).

IEI was designated pursuant to E.O. 13382 on September 17, 2008, for being owned or controlled by MODAFL. SAIRC was designated pursuant to E.O. 13382 on November 15, 2022, for having provided, or attempted to provide, financial, material, technological or other support for, or goods or services in support of, the IRGC ASF.

SAPA is being designated pursuant to E.O. 13382 for being owned or controlled by, or acting or purporting to act for or on behalf of, directly or indirectly, IEI.

Iran-based **Sarmad Electronic Sepahan Company (Sarmad)** has produced two types of components identified in Mohajer-6 UAVs downed by Ukrainian forces. The Mohajer-6 -- which maintains intelligence, surveillance, and reconnaissance (ISR) and strike capabilities -- is produced by Iran's Qods Aviation Industries (QAI) and has been used by Russian forces in Ukraine. Sarmad reverse engineers Western-origin components, such as servomotors and flowmeters, which are then used by QAI in the production of the Mohajer-6 and other Iranian-origin UAVs. QAI was designated pursuant to E.O. 13382 on December 12, 2013 for having provided material support to MODAFL and being owned or controlled by the IRGC.

Sarmad 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, QAI.

Since September 2022, OFAC has issued ten rounds of designations targeting domestic production of Iran's UAV program. Today's actions, which are taken pursuant to E.O. 13382,

builds upon OFAC's [March 21, 2023](#) and [September 27, 2023](#) designations of UAV component procurement networks and [January 6, 2023](#) designation of QAI executives.

EMILY LIU AND RAYAN ROSHD AFZAR COMPANY

OFAC is also sanctioning Iranian weapons proliferation networks led by Emily Liu and Rayan Roshd Afzar Company (Rayan Roshd). OFAC designated Emily Liu and Rayan Roshd on July 18, 2017 for having provided material support for Iran's Shiraz Electronics Industries (SEI) and IRGC, respectively. Since at least 2014, Emily Liu sought to procure U.S.- and Western-origin electronic components for SEI, a MODAFL subsidiary responsible for producing various equipment including radars, avionics and control systems, and missile guidance technology for Iran's military. Rayan Roshd has produced technical components for the IRGC's UAV program and worked to produce software for the IRGC's aerospace program.

PRC-based **Yongxin Li**, also known as Emma Lee, is an associate of Emily Liu who supported the procurement of various dual-use electronics including printed circuit boards, ultrasonic sensors, diodes, oxygen sensors, and integrated circuits on multiple occasions for Rayan Roshd. Hong Kong-based **Yiu Wa Yung**, also known as Stephen Yung, worked with Emma Lee to facilitate procurement and arrange shipments for Rayan Roshd.

ICGOO Electronics Limited (ICGOO), a Hong Kong-based distributor of electronic components, has provided sensitive components, including U.S.-origin goods, to OFAC-designated Raybeam Optronics Co. Ltd. (Raybeam). Raybeam, along with Sunway Tech Co., Ltd. (Sunway) and two other firms, were designated pursuant to E.O. 13382 on July 18, 2017, for having provided material support for Emily Liu and her proliferation activities.

Emma Lee 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, Rayan Roshd. Stephen Yung 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, Emma Lee. ICGOO 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, Raybeam.

OFAC is also updating the Specially Designated Nationals (SDN) List to include additional identifying information for Emily Liu, Raybeam, and Sunway to assist the compliance community with identifying these blocked persons.

UAV AND MISSILE BOAT TRANSFERS TO VENEZUELA

Iran-based **QAI** is a subsidiary of MODAFL's Iran Aviation Industries Organization (IAIO) that produces Iran's Mohajer-series ultra-light UAVs. QAI has previously exported the Mohajer-2 UAV model to Venezuela, where it was rebranded as the "Arpia." More recently, QAI has engaged with senior Caracas officials on the sale of Mohajer-6 UAVs and aircraft to Venezuela. As the managing director of QAI, Iran-based **Ghasem Damavandian (Damavandian)**, has coordinated QAI's UAV exports and upgrades for Venezuela.

QAI is being designated pursuant to E.O. 13949 for being owned or controlled by, or having acted or purported to act for or on behalf of, directly or indirectly, MODAFL. It was previously designated pursuant to E.O. 13382 and E.O. 14024. Damavandian is being designated pursuant to E.O. 13949 for having acted or purported to act for or on behalf of, directly or indirectly, QAI.

Iranian defense minister **Mohammad-Reza Ashtiani (Ashtiani)** has overseen MODAFL's supply of UAVs and other weapons to Venezuela. Ashtiani also manages an Iran-Venezuela oil venture that finances defense projects. Ashtiani was previously designated pursuant to E.O. 13876 on January 10, 2020, for being a person appointed to a position as a state official of Iran by the Supreme Leader of Iran.

Iran-based **Seyed Hojatollah Ghoreishi (Ghoreishi)**, as MODAFL's Deputy for Supply, Research, and Industry Affairs, has negotiated Iran's UAV sales and defense agreements with Venezuela, including an arms sales agreement likely worth hundreds of millions of dollars. In connection with his role in Iran's agreement to supply UAVs to Russia in 2022, Ghoreishi was designated pursuant to E.O. 13382 on January 6, 2023, for acting or purporting to act for or on behalf of, directly or indirectly, MODAFL and QAI.

Iran's Defense Attaché in Venezuela, **Jaber Reihani (Reihani)**, has coordinated Iran's defense cooperation with Venezuela, to include the aforementioned arm sales agreement. As a representative of MODAFL, Reihani has overseen Iran's efforts to provide assistance to Venezuela's UAV program. Reihani has also previously served as the commercial director for QAI. Iran-based **Seyed Hamzeh Ghalandari (Ghalandari)**, as MODAFL's Director General for International Relations, has facilitated Iran's UAV- and defense-related deals with Venezuela. Ashtiani, Ghoreishi, Reihani, and Ghalandari are being designated pursuant to E.O. 13949 for having acted or purported to act for or on behalf of, directly or indirectly, MODAFL.

The general cargo vessel **PARNIA** has historically been used by MODAFL for defense exports to other countries. The PARNIA recently transported several Iranian Peykaap III fast attack missile patrol boats to Venezuela.

The PARNIA is being identified pursuant to E.O. 13949 as property in which MODAFL has an interest.

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. 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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