

Treasury Targets Multiple Procurement Networks Supporting Iran's Proliferation-Sensitive Programs

March 20, 2024

WASHINGTON — Today, the U.S. Department of the Treasury's Office of Foreign Assets Control (OFAC) targeted three procurement networks -- based in Iran, Türkiye, Oman, and Germany -- that have supported Iran's ballistic missile, nuclear, and defense programs. These networks have procured carbon fiber, epoxy resins, and other missile-applicable goods for Iran's Islamic Revolutionary Guard Corps Aerospace Force Self Sufficiency Jihad Organization (IRGC ASF SSJO), Ministry of Defense and Armed Forces Logistics (MODAFL), other U.S.-designated entities in Iran's defense industrial base, and Iran Centrifuge Technology Company (TESA), which is linked to the Atomic Energy Organization of Iran (AEOI).

"Through complex covert procurement networks, Iran seeks to supply rogue actors around the world with weapons systems that fuel conflict and risk countless civilian lives," said Under Secretary of the Treasury for Terrorism and Financial Intelligence Brian E. Nelson. "The United States will continue to use our tools to disrupt these networks and hold accountable those countries that would help proliferate Iran's drones and missiles."

Today's action was taken pursuant to Executive Order (E.O.) 13382, which targets proliferators of weapons of mass destruction (WMD) and their means of delivery. This action builds on OFAC's [June 6, 2023](#) and [October 18, 2023](#) designations targeting third-country procurement networks supporting the IRGC, MODAFL, and their subsidiaries' ballistic missile production. The U.S. Department of State designated the IRGC and MODAFL pursuant to E.O. 13382 on October 25, 2007 in connection with Iran's ballistic missile program. MODAFL oversees a range of subsidiaries involved in ballistic missile production. The U.S. Department of State designated the IRGC ASF SSJO, which is involved in ballistic missile research and flight test launches, pursuant to E.O. 13382 on July 18, 2017.

MAZIAR KARIMI AND PROCUREMENT NETWORK

Germany-based dual Iranian-German national **Maziar Karimi (Karimi)** has procured epoxy resin and other items for Iran's IRGC ASF SSJO using a complex web of intermediaries and

front companies. Karimi is a long-time procurement agent who has supported Iran's defense industry since at least 2013. Germany-based **Mazixon GmbH and Co KG (Mazixon GmbH)** is majority-owned and directed by Karimi. Karimi has used Mazixon GmbH to facilitate procurements for the IRGC ASF SSJO and its ballistic missile program. Karimi is also the managing director and majority owner of Germany-based firm **Mazixon Verwaltungs GmbH (Mazixon Verwaltungs)**.

Karimi has used Oman-based **Mazaya Alardh Aldhabia LLC (MAA)** as a front company to facilitate procurements for Iranian defense end-users, including the IRGC ASF SSJO and Iran's MODAFL. MAA, in collaboration with Mazixon GmbH, has facilitated shipments of epoxy resin and other items to Iran in support of Karimi's procurements for Iran's defense sector. Karimi has also facilitated the procurement of antennas using Mazixon GmbH and MAA as intermediaries.

Karimi has also used Türkiye-based **Tit Uluslararası Nakliyat Deri Tekstil Gıda Sanayi Ve Ticaret Limited Sirketi (Uluslararası)** as another front company to facilitate procurements for Iranian defense end-users, including the IRGC ASF SSJO. Uluslararası has been involved in the shipment of epoxy resin and other items to Iran in support of Karimi's procurements for the IRGC ASF SSJO.

Karimi 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, a person whose property and interests in property are blocked pursuant to E.O. 13382. Mazixon GmbH and Mazixon Verwaltungs are being designated pursuant to E.O. 13382 for being owned or controlled by Karimi, a person whose property and interests in property are blocked pursuant to E.O. 13382. MAA and Uluslararası 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, the IRGC ASF SSJO.

TÜRKIYE-BASED CARBON FIBER PROCUREMENT NETWORK FOR MODAFL

Türkiye-based company **Gokler Dis Ticaret Limited Sirketi (Gokler)** has facilitated procurements of carbon fiber and solvents used in the production of carbon fiber for Iran's MODAFL and its subsidiaries. Türkiye-based **Mahmut Gok (Gok)** is the managing director of

Gokler and has personally conducted procurements of artificial graphite destined for Iran on behalf of the company.

Gok has used his other Türkiye-based company, **Mahmut Gok Skies Petroleum Dis Ticaret (Skies Petroleum)**, to conduct shipments destined for Iran. Gok is the President of the Executive Board for Türkiye-based **DM Gold Kıymetli Madenler Anonim Sirketi (DM Gold)** and has used DM Gold as a front company for illicit Iranian procurement efforts. Gok also recently established Türkiye-based **Klas Kimyasal Urunler Ticaret Limited Sirketi (Klas Kimyasal)** as an additional front company for procurements likely for Iranian end-users.

Gokler 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, MODAFL, a person whose property and interests in property are blocked pursuant to E.O. 13382. Gok is being designated pursuant to E.O. 13382 for acting or purporting to act for or on behalf of, directly or indirectly, Gokler, a person whose property and interests in property are blocked pursuant to E.O. 13382. Skies Petroleum, DM Gold, and Klas Kimyasal are 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, Gok, a person whose property and interests in property are blocked pursuant to E.O. 13382.

IRAN-BASED AND TÜRKİYE-BASED PROLIFERATION-SENSITIVE COMPOSITE PRODUCTION AND PROCUREMENT

Rostam Shahmari Ghojeh Biklo (Shahmari), **Pishro Mobtaker Peyvand (PMP)**, and **Mitra Inanlu** were involved in the procurement of proliferation-sensitive material for proscribed elements of Iran's nuclear and other military weapons programs. Shahmari is the managing director of PMP, who managed procurement activities on behalf of the company, including procurements in the interest of TESA. PMP procured resin, hardener, and accelerator on behalf of TESA and resin on behalf of Kalaye Electric Company (KEC).

The U.S. Department of the Treasury designated TESA on November 21, 2011, and KEC on February 16, 2007, pursuant to E.O. 13382. TESA and KEC are subordinate to AEOI and routinely collaborate on projects in support of AEOI, which itself is designated pursuant to E.O. 13382. AEOI is the main Iranian organization responsible for research and development activities in the field of nuclear technology, including Iran's centrifuge enrichment program and experimental laser enrichment of uranium program.

Shahmari and PMP 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, AEOI, a person whose property and interests in property are blocked pursuant to E.O. 13382.

Mitra Inanlu is the chairwoman of the board, managing director, and beneficial owner of Mandegar Baspar Fajr Asia Company (Mandegar Baspar). On August 29, 2014, the U.S. Department of State designated Mandegar Baspar pursuant to E.O. 13382 for engaging in or attempting to engage in activities that have materially contributed to, or posed a risk of materially contributing to, the proliferation of WMD or their means of delivery.

Mitra Inanlu is being designated pursuant to E.O. 13382 for acting or purporting to act for or on behalf of, directly or indirectly, Mandegar Baspar, a person whose property and interests in property are blocked pursuant to E.O. 13382.

Alborz Organic Materials Engineering Company is owned by Mitra Inanlu and was established to manufacture epoxy resins and other materials of the composite industry.

Alborz Organic Materials Engineering Company 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, Mitra Inanlu, a person whose property and interests in property are blocked pursuant to E.O. 13382.

Hidayet Kanoglu (Kanoglu) procured resin and hardener for Sazeh Morakab Co. Ltd (Sazeh Morakab) for the ultimate benefit of TESA. On August 29, 2014, the U.S. Department of the Treasury designated Sazeh Morakab pursuant to E.O. 13382 for providing services to Shahid Hemat Industrial Group (SHIG) and Iran's Aircraft Manufacturing Industrial Company (HESA).

Kanoglu 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, Sazeh Morakab, 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 persons 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 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 or entities 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 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 here.](#)

[Click here for more information on the individuals and entities designated today.](#)

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