

U.S. DEPARTMENT OF THE TREASURY

Treasury Targets Networks Facilitating Illicit Trade and UAV Transfers on Behalf of Iranian Military

April 25, 2024

WASHINGTON — Today, the Department of the Treasury’s Office of Foreign Assets Control (OFAC) is sanctioning over one dozen entities, individuals, and vessels that have played a central role in facilitating and financing the clandestine sale of Iranian unmanned aerial vehicles (UAVs) for Iran’s Ministry of Defense and Armed Forces Logistics (MODAFL), which itself is involved in supporting Iran’s Islamic Revolutionary Guard Corps (IRGC) and Russia’s war in Ukraine. **Sahara Thunder** is the main front company that oversees MODAFL’s commercial activities in support of these efforts. Sahara Thunder also plays a key role in Iran’s design, development, manufacture, and sale of thousands of UAVs, many of them ultimately transferred to Russia for use in its war of aggression against Ukraine. OFAC is also sanctioning two companies and a vessel involved in the shipment of Iranian commodities for Sepehr Energy Jahan Nama Pars, which similarly plays a leading role in the commercial activities of Iran’s Armed Forces General Staff (AFGS). Concurrent with this action, the United Kingdom and Canada are imposing sanctions targeting several entities and individuals involved in Iran’s UAV procurement and other military-related activities.

“Iran’s Ministry of Defense continues to destabilize the region and world with its support to Russia’s war in Ukraine, unprecedented attack on Israel, and proliferation of UAVs and other dangerous military hardware to terrorist proxies,” said Under Secretary of the Treasury for Terrorism and Financial Intelligence Brian E. Nelson. “The United States, in close coordination with our British and Canadian partners, will continue to use all means available to combat those who would finance Iran’s destabilizing activities.”

Today’s action is being taken pursuant to the counterterrorism authority in Executive Order (E.O.) 13224, as amended, E.O. 13382, a counterproliferation authority, and E.O. 14024, which targets Russia’s harmful foreign activities. OFAC designated MODAFL pursuant to E.O. 13224 on [March 26, 2019](#) for assisting, sponsoring, or providing financial, material, or technological support for, or financial or other services to or in support of, Iran’s Islamic Revolutionary Guard Corps-Qods Force (IRGC-QF). The IRGC-QF was designated pursuant to E.O. 13224 on

October 25, 2007 for providing support to multiple terrorist groups. The Department of State designated MODAFL pursuant to E.O. 13382 and E.O. 14024 on [October 25, 2007](#) and [February 23, 2024](#), respectively.

SAHARA THUNDER

The Iranian government allocates billions of dollars' worth of commodities to Iranian military entities including MODAFL and the AFGS as part of the Iranian military's annual budget. Sahara Thunder, which is subordinate to MODAFL, oversees MODAFL's commercial activities. In November 2023, OFAC sanctioned the network of [Sepehr Energy Jahan Nama Pars Company \(Sepehr Energy\)](#), which plays a similar role leading the sale of Iranian commodities on behalf of the AFGS.

Sahara Thunder has also played an instrumental role in the Iranian military's sale of UAVs. MODAFL has cooperated with Russia to finance and produce Iranian-designed one-way attack UAVs at the U.S.-sanctioned [Joint Stock Company Special Economic Zone of Industrial Production Alabuga \(SEZ Alabuga\)](#) facility in Russia under a \$1.75 billion contract. As of late 2022, Russian officials were negotiating a deal for Sahara Thunder to deliver and produce thousands of UAVs per year at this facility. Such UAVs have been used by the Russian military in Ukraine against critical infrastructure and civilian targets.

U.S.-sanctioned [Generation Trading FZE](#) has been used as part of this network to receive millions of dollars' worth of payments from SEZ Alabuga and its subsidiaries as part of Russia's contract with MODAFL.

Generation Trading FZE was designated on February 23, 2024 pursuant to E.O. 13224, as amended, for having materially assisted, sponsored, or provided financial, material, or technological support for, or goods or services to or in support of, MODAFL. SEZ Alabuga was designated pursuant to E.O. 14024 on February 23, 2024, for operating or having operated in the defense and related materiel sector of the Russian Federation economy.

Sahara Thunder is being designated pursuant to E.O. 13224, as amended, for having materially assisted, sponsored, or provided financial, material, or technological support for, or goods or services to or in support of, MODAFL. Sahara Thunder is also being designated pursuant to E.O. 14024 for operating in the defense and related materiel sector of the Russian Federation economy.

SAHARA THUNDER'S LEADERSHIP

Kazem Mirzai Kondori (Kondori), **Hossein Bakshayesh (Bakshayesh)**, and **Hojat Abdulahi Fard (Abdulahi Fard)** are officials of Sahara Thunder. Bakshayesh has been the managing director of Sahara Thunder, while Abdulahi Fard has served as a board member at Sahara Thunder and a representative of Iranian company **Etemad Tejarat Misagh**, which is also a subsidiary of MODAFL.

Kondori and Bakshayesh are being designated pursuant to E.O. 13224, as amended, for having acted or purported to act for or on behalf of, directly or indirectly, Sahara Thunder. Abdulahi Fard is being designated pursuant to E.O. 13224, as amended, for being a leader or official of Sahara Thunder.

Kondori, Bakshayesh and Abdulahi Fard are also being designated pursuant to E.O. 14024 for being a leader, official, senior executive officer, or member of the board of directors of Sahara Thunder. Etemad Tejarat Misagh is being designated pursuant to E.O. 14024 for being owned or controlled by, or having acted or purported to act for or on behalf of, directly or indirectly, MODAFL.

SAHARA THUNDER'S GLOBAL SHIPPING NETWORK

Iranian military entity Sahara Thunder relies on a vast shipping network involved in the sale and shipment of Iranian commodities on behalf of MODAFL to multiple jurisdictions including the People's Republic of China (PRC), Russia, and Venezuela. Sahara Thunder has entered into time-charter contracts with India-based **Zen Shipping & Port India Private Limited** for the Cook Islands-flagged vessel **CHEM** (IMO 9240914), which is managed and operated by UAE-based **Safe Seas Ship Management FZE**. Sahara Thunder has used the CHEM to conduct multiple shipments of commodities since 2022. Iran-based **Arsang Safe Trading Co.** has provided ship management services in support of several Sahara Thunder-related shipments, including those by the CHEM.

Safe Seas Ship Management FZE also manages and operates the Palau-flagged **DANCY DYNAMIC** (9158161), Cook Islands-flagged **K M A** (9234616), and Cook Islands-flagged **CONRAD** (9546722), all of which have been used to ship Iranian commodities.

Iran-based **Asia Marine Crown Agency** has served as the port agent in Bandar Abbas, Iran supporting several Sahara Thunder shipments. India-based **Sea Art Ship Management**

(OPC) Private Limited and UAE-based company **Trans Gulf Agency LLC** have worked together to provide ship management services in support of Sahara Thunder. UAE and Iran-based **Coral Trading EST.** has purchased Iranian commodities from Sahara Thunder.

Zen Shipping & Port India Private Limited, Safe Seas Ship Management FZE, Arsang Safe Trading Co., Asia Marine Crown Agency, Coral Trading EST., and Sea Art Ship Management (OPC) Private Limited are being designated pursuant to E.O. 13224, as amended, for having materially assisted, sponsored, or provided financial, material, or technological support for, or goods or services to or in support of, Sahara Thunder. Trans Gulf Agency LLC is being designated pursuant to E.O. 13224, as amended, for having materially assisted, sponsored, or provided financial, material, or technological support for, or goods or services to or in support of, Sea Art Ship Management (OPC) Private Limited.

The CHEM, DANCY DYNAMIC, K M A, and CONRAD are being identified as property in which Safe Seas Ship Management FZE has an interest.

SEPEHR ENERGY SHIPMENT

Onden General Trading FZE is a UAE-based broker which sold Iranian commodities on Sepehr Energy's behalf to be delivered off shore near Singapore. Sepehr Energy's shipment, valued at several tens of millions of dollars, was loaded in the Persian Gulf aboard a vessel disguising itself as a different vessel. The vessel **LA PEARL** (9174660), also known as the **ELITE**, received the cargo via a ship-to-ship transfer from another vessel in mid-April in international waters near Singapore. Panama-based **Saone Shipping Corporation** is the operator and owner of the LA PEARL.

Onden General Trading FZE and Saone Shipping Corporation are being designated pursuant to E.O. 13224, as amended, for having materially assisted, sponsored, or provided financial, material, or technological support for, or goods or services to or in support of, Sepehr Energy Jahan Nama Pars Company. The LA PEARL is being identified as property in which Saone Shipping Corporation has an interest.

POUYA AIR

Iranian cargo airline **Pouya Air** was designated on [March 27, 2012](#) pursuant to E.O. 13224 for acting for or on behalf of the IRGC-QF to transport illicit cargo, including weapons, to Iran's proxies in the Middle East. Pouya Air is being re-designated under E.O. 13382 for its

transshipment of Iranian military UAVs to Russia. Pouya Air's Ilyushin-76 aircraft **EP-PUS** has transported UAVs and UAV-related cargo from Iran to Russia on behalf of the IRGC Aerospace Force. Some of the UAVs and UAV-related cargo was intended for the SEZ Alabuga.

Pouya Air 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 Aerospace Force. EP-PUS is being identified as property in which Pouya Air has an interest. The IRGC Aerospace Force was designated pursuant to E.O. 13382 on [June 16, 2010](#).

UAV PROCUREMENT AND DEVELOPMENT

Bonyan Danesh Shargh Private Company (Bonyan Danesh Shargh) is an Iran-based company that produces UAVs, quadcopters, engines, and electronic and digital parts. The company engages in a wide range of business activities and operates in the public and private sectors in Iran and abroad. Bonyan Danesh Shargh has served as an intermediary for the Islamic Revolutionary Guard Corps Aerospace Force Self-Sufficiency Jihad Organization (IRGC ASF SSJO) in its business dealings. Bonyan Danesh Shargh has been involved in the IRGC ASF SSJO discussions regarding the Alabuga UAV facility in Russia.

The IRGC ASF SSJO is involved in Iranian ballistic missile research and development and manages Iran's production of Shahed-series UAVs. The Department of State designated the IRGC ASF SSJO pursuant to E.O. 13382 on [July 18, 2017](#) for engaging, or attempting to engage, in activities or transactions that have materially contributed to, or pose a risk of materially contributing to, the proliferation of weapons of mass destruction or their means of delivery. Bonyan Danesh Shargh 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.

BONYAN DANESH SHARGH LEADERSHIP AND BUSINESS NETWORK

Abbas Abdi Asjerd (Asjerd) has served as Chief Executive Officer of Bonyan Danesh Shargh where **Seyed Mohsen Vahabzadeh Moghadam (Moghadam)** and **Zahra Abdi Asjerd (Zahra)** have served in different official capacities. **Hamid Eidi Ashjerdi (Eidi)** has provided corporate auditing and inspection services to Bonyan Danesh Shargh.

Asjerd, Moghadam, and U.S.-designated IRGC ASF SSJO Chief Abdollah Mehrabi (Mehrabi) serve in different official capacities at the Iran-based firm **Baran Sazan Caspian Anzali Free Zone Company (BSC)**. Asjerd and Moghadam are also board members of the Iran-based firms **Sanaye Motorsazi Alvand Private Company (Alvand)** and **Pishro Sanat Aseman Sharif Private Company (Pishro Sanat)**. Alvand manufactures, imports, and exports UAVs and engines. Pishro Sanat designs and manufactures sensitive UAV components, including servomotors. **Mohammad Ali Moradipour (Moradipour)** has provided corporate auditing and inspection services to Alvand.

Mehrabi was designated pursuant to E.O. 13382 on [October 29, 2021](#) for acting or purporting to act for or on behalf of, directly or indirectly, the IRGC ASF SSJO.

Asjerd, Moghadam, and Zahra are being designated pursuant to E.O. 13382 for acting or purporting to act for or on behalf of, directly or indirectly, Bonyan Danesh Shargh. BSC, Alvand, and Pishro Sanat are being designated pursuant to E.O. 13382 for being owned or controlled by, directly or indirectly, Asjerd. Eidi 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, Bonyan Danesh Shargh. Moradipour 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, Alvand.

SANCTIONS IMPLICATIONS

As a result of today's action, all property and interests in property of the designated persons described above that are in the United States or in the possession or control of U.S. persons are blocked and must be reported to OFAC. In addition, any entities that are owned, directly or indirectly, individually or in the aggregate, 50 percent or more by one or more blocked persons are also blocked. Unless authorized by a general or specific license issued by OFAC, or exempt, OFAC's regulations generally prohibit all transactions by U.S. persons or within (or transiting) the United States that involve any property or interests in property of designated or otherwise blocked persons.

In addition, financial institutions and other persons that engage in certain transactions or activities with the sanctioned entities and individuals may expose themselves to sanctions or be subject to an enforcement action. The prohibitions include the making of any contribution or provision of funds, goods, or services by, to, or for the benefit of any

designated person, or the receipt of any contribution or provision of funds, goods, or services from any such person.

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](#). For detailed information on the process to submit a request for [removal from an OFAC sanctions list, please click here](#).

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

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