

## FINANCIAL INTELLIGENCE UNIT OF THE BAHAMAS PUBLIC NOTICE

No. 8 of 2019

21 September 2019

NOTICE TO ALL MONEY LAUNDERING REPORTING OFFICERS

Re: UNITED STATES SANCTIONS DESIGNATIONS TARGETING IRAN'S ORGANIZATION OF DEFENSIVE INNOVATION AND RESEARCH (SPND)

The Financial Intelligence Unit of The Bahamas hereby advises all Money Laundering Reporting Officers (MLROs) of entities that are defined as a "Financial Institution" pursuant to Section 3 of the Financial Transactions Reporting Act, 2018, to take note of the United States Sanctions Designations Targeting Iran's Organization of Defensive Innovation and Research (SPND).

Pursuant to Section 3B(3) of the International Obligations (Economic and Ancillary Measures) Amendment Act, 2019 ("the Act") where there is no order in respect of a unilateral sanction the Attorney General may direct any regulatory agency to require all persons regulated to a perform a search of their database and register of beneficial owners for any person named in that unilateral sanction.

Financial institutions are therefore required to review its client database against the attached list and any positive and negative returns should as soon as practicable be submitted to the Financial Intelligence Unit

All declarations should be addressed to the Director of the Financial Intelligence Unit.

Mr. Quinn W. McCartney, QPM Director

Financial Intelligence Unit 3rd Floor, Norfolk House Frederick Street P.O. Box SB-50086

Nassau, Bahamas

Tele: (242) 356-9808/ (242) 326-3815

Fax: (242) 322-5551

Email: director.fiu@fiubahamas.bs

## II. SPND-Associated Individuals

INDIVIDUAL: Mansur Asgari

DOB: June 3, 1958 POB: Tehran, Iran

Asgari has served as head of SPND's Research and Technology Department. He was previously a manager under the Amad plan, overseeing projects focused on explosives and exploding bridge-wire (EBW) detonators.

INDIVIDUAL: Sa'id Borji

DOB: 1958

POB: Abadan, Iran

Borji is an explosives and metals expert for SPND's Shahid Karimi Group. He has designed explosive forming sites and assisted SPND's efforts to procure equipment used for containing explosives.

INDIVIDUAL: Reza Ebrahimi AKA: Mohammad Ebrahimi DOB: March 21, 1973

POB: Tehran, Iran

Ebrahimi is an SPND employee who worked on Iran's Amad plan, where he was involved in numerous explosive experiments related to the development of a nuclear weapon. He also served at the head of Iran's Aerospace Research Institute.

INDIVIDUAL: Jaial Emami Gharah Hajjlu

AKA: Jalal Emami Ghareh Hajlou

DOB: March 21, 1969

POB: Gha'emshahr, Iran

Emami was a weapons systems researcher at SPND's Shahid Karimi Group and also served as a senior expert and quality control manager for the Amad plan.

INDIVIDUAL: Gholam Reza Eta'ati

DOB: 1973

POB: Tehran, Iran

Eta'ati is an expert in applied physics who serves as SPND senior manager overseeing some of the organization's most sensitive projects.

INDIVIDUAL: Ruhollah Ghaderi Barmi

AKA: Rouhallah Qadari Brahemi

DOB: 1979

Ghaderi is a director at SPND's Shahid Fakhar Moghaddam Group, where he oversees manufacturing and production. He has also been involved in attempts by Shahid Fakhar to procure x-ray equipment from foreign suppliers.

INDIVIDUAL: Sayyed Asghar Hashemitabar

DOB: August 23, 1974 POB: Sabzevar, Iran

Hashemitabar has served as a managing expert at SPND's Shahid Chamran Group, where he has focused on pulse power research.

INDIVIDUAL: Mohammad Reza Mehdipur

DOB: August 6, 1975

POB: Naein, Iran

Mehdipur is the head of SPND's Shahid Karimi Group and has overseen weapons systems, materials, and explosion and shock research conducted on behalf of SPND.

INDIVIDUAL: Akbar Motallebizadeh

DOB: July 23, 1963 POB: Yazd, Iran

Motallebizadeh was previously the head of SPND's Shahid Karimi Group, where he supervised SPND projects. He has also served as an advisor to Mohsen Fakhrizadeh, the head of SPND.

INDIVIDUAL: Mohammad Javad Safari

DOB: August 7, 1980

POB: Borazjam, Dashtestan, Bushehr, Iran

Safari is a calculations and measurements expert at SPND's Shahid Fakhar Moghaddam Group. He has also served as a technical expert on Iran's delegation to the Comprehensive Nuclear Test Ban Treaty Organization.

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## III. SPND Subordinate Organizations

ENTITY: Abu Reihan Group

ADDRESS: Iran

Abu Reihan has provided support to SPND projects related to satellites and plasma technology. It has also worked on SPND's missile and air defense projects.

ENTITY: Bu Ali Group AKA: Boali Group ADDRESS: Iran

Bu Ali is an SPND subsidiary whose undertakings range from building bioreactors to conducting lab work on DNA sequencing.

ENTITY: Heidar Karar Group

AKA: Heidar Karrar Research Group

AKA: Haydar Karar Center

ADDRESS: Iran

Heidar Karar Group is an SPND subsidiary that works on cyber defense systems.

ENTITY: Sadra Research Center

AKA: Sadra Center ADDRESS: Iran

Sadra is an SPND subsidiary that specializes in cognitive sciences and has studied ways to mentally improve Iran's elite military personnel.

ENTITY: Shahid Avini Group

ADDRESS: Iran

Shahid Avini is an SPND subsidiary that has conducted studies on nuclear terrorism, distinguishing sources of natural and man-made incidents, and the opportunities presented by treaties and conventions governing the use and testing of various weapons of mass destruction.

ENTITY: Shahid Baba'i Group AKA: Shahid Babaei Group

ADDRESS: Iran

Shahid Baba'i is an SPND subsidiary that designs and manufactures high-powered lasers. It also researches photonics and semiconductors under SPND auspices.

ENTITY: Shahid Chamran Group

ADDRESS: Iran

Shahid Chamran is an SPND subsidiary whose work includes studies on electron acceleration and mass transfer. It conducts research for SPND related to electromagnetics, pulse power, and wave generation.

/// /// ENTITY: Shahid Fakhar Moghaddam Group AKA: Shahid Fakhar Moqadam Group

ADDRESS: Iran

Shahid Fakhar is a subsidiary of SPND that has constructed explosion simulators and built radiation and neutron monitoring and detection systems. It helped SPND establish research institutes dedicated to physics-related calculations.

ENTITY: Shahid Karimi Group

ADDRESS: Iran

Shahid Karimi is an SPND subsidiary that works on missile and explosive-related projects for SPND. It has conducted weapons systems, materials, and explosion and shock research on behalf of SPND.

ENTITY: Shahid Kazemi Group

ADDRESS: Iran

Shahid Kazemi is an SPND subsidiary that conducts acoustics-related research.

ENTITY: Shahid Movahhed Danesh Group AKA: Shahid Movahed Danesh Group

ADDRESS: Iran

Shahid Movahhed assists SPND with laser and photonics research.

ENTITY: Shahid Shorki Science and Technology Research Center

AKA: Shahid Shikri Center

AKA: Shahid Shorki Research Center

ADDRESS: Iran

Shahid Shorki is an SPND subsidiary that focuses on radiation and radiation exposure.

ENTITY: Shahid Zeinoddin Group

ADDRESS: Iran

Shahid Zeinoddin primarily concentrates on biological research and developing biotechnologies for SPND. Among the topics it has studied on behalf of SPND are treating poisonings, drug delivery methods, and biological defense systems.

ENTITY: Sheikh Baha'i Science and Technology Research Center

AKA: Sheikh Bahaei Center

ADDRESS: Iran

Sheikh Baha'i is an SPND subsidiary that works on radiation and applied physics.

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## IV. SPND Procurement and Cover Companies/Individuals

ENTITY: Kimiya Kakhsh Shargh AKA: Kimiya Pakhsh Shargh Group

AKA: Kimia AKA: KPS Co AKA: KPS Co Ltd

AKA: Kimia Pakhsh Shargh

AKA: Kimiya Pakhsh Shargh Co Ltd

AKA: KPS

ADDRESS: No 6, West Zartosht Ave, Between Joybar & Valiasr, Tehran, Iran

ALT ADDRESS: Tehran, West Zoroaster, Between Joybar & Valiasr No 6 Box 42670

ALT ADDRESS: First Floor, No 10, the 11th Alley, Prideful Streets, Martyr Beheshti, Sarafraz

Street, Beheshti Avenue, Tehran, Iran

ALT ADDRESS: No 1, Next to Mehr Credit Institute, Zartosht Street, Tehran, Iran, 1415863911

WEBSITE: <a href="https://kps-co.com">https://kps-co.com</a>
ALT WEBSITE: <a href="https://kps-co.com">www.kps-co.com</a>

KPS is subordinate to SPND and takes direction from SPND officials. It is an SPND procurement company that acquires dual-use materials from foreign suppliers.

INDIVIDUAL: Mehdi Masoumian

AKA: Mahdi Masumian LOCATION: Iran

Masoumian is an SPND employee that serves as the Managing Director of KPS. He has coached foreign suppliers on navigating customs and payments to circumvent sanctions-related restrictions.

INDIVIDUAL: Mohammad Hossein Haghighian

DOB: 1989 LOCATION: Iran

Haghighian is the Commercial Manager of KPS, where his responsibilities include handling customers and regulatory processes for importing goods. He also oversees technical inspections on behalf of KPS.

ENTITY: Paradise Medical Pioneers (PMP) Company

ADDRESS: 4th Floor, Number 4, Ziba Alley, Below the Zafar Gas Station, Shariati Street, Tehran, Iran

PMP is an SPND cover company that is administratively subordinate to SPND. Senior SPND officials, including Mohsen Fakhrizadeh, hold various positions in the company. It researches and produces composites, steels, polymers, and other materials for SPND.

ENTITY: Puya Electro Saman Niru (Pulse Niru)

AKA: Pulse Niru Industries

AKA: Pulseniru Inc. AKA: Pulse Niru Co

ADDRESS: 34 Ayazi Alley Morghab Street, Khoramashar Street, Tehran, Iran 1553633913

ALT ADDRESS: Km 20 Damavand Road, Pardis Technologies Park, Noavari Fourth Avenue

No 46, Tehran, Iran

WEBSITE: http://pulseniru.com

Pulse Niru designs and manufactures pulse power devices, develops technology for controlled fusion, and produces particle accelerators. It has sought to procure sophisticated equipment for SPND from China, Russia, and other foreign suppliers.

INDIVIDUAL: Mohammad Mahdi Da'emi Attaran

AKA: Mohammad Mahdi Attaran

AKA: Mahdi Attaran DOB: July 13, 1979 POB: Mashhad, Iran

Attaran is Pulse Niru's Chief Executive Officer and is directly involved in Pulse Niru's efforts to supply and provide specialized services to SPND. A pulse power expert, Attaran has spent over a decade working on dual-use technologies for Pulse Niru. He has also lent his expertise to Iran's Center for Innovation and Technology Cooperation (CITC), which was designated pursuant to E.O. 13382 in July 2012.

INDIVIDUAL: Mohsen Shafa'i

DOB: 1971

POB: Tehran, Iran

Shafa'i is Pulse Niru's Managing Director and has worked on the design, testing, and production of new technologies at Pulse Niru.