People's Mojahedin Organization of Iran (Pmoi/Mek) 10 October 2012

1. Identifying one of the agencies to skirt sanctions in the office of Ahmadinejad

One of the agencies in the presidential office assigned for skirting sanctions is the Center for Innovation and Technology Co-operation (CITC) of the President's Office. This organization was established 10 years ago and is located in a building separate from the presidential office. In the beginning it was not set up for skirting sanctions, but it focused on this task gradually and currently it is explicitly involved in this matter. The core of activities in this center and its main task is "technology diplomacy," which is in fact to explore ways to skirt sanctions. One of its institutions is its international affairs office that pursues the ways to skirt sanctions under the guise of "technology diplomacy."

This institution's attempt is to form necessary lobbies to skirt sanctions. Regime agents, either directly or indirectly, establish political relationships with politicians and officials of countries - or through mediators who are in connection with officials in countries - in a bid to violate US or UN Security Council sanctions through these officials. Through them, the regime raises its needs regarding technology equipment and obtains them and as such it skirts sanctions.

Hierarchy of Center for Innovation and Technology Cooperation of the President's office:

Director: Hamid Reza Amirinia

Director of international affairs: Ali Morteza Birang

Director for Western Europe: Ahmadi

Director for international affairs: Morteza Birang, works with Hamid Reza Amirinia to provide regime's needs from various countries.

This organization pursues several projects in various countries; some of the violations of sanctions are carried out through oil deals. In each country, the deputy ambassador in the regime's embassy is in charge of skirting sanctions.

Financial needs of these projects are met by sending money in cash in the form of diplomatic pouches by the foreign ministry to the embassies, then, (Iranian or non-Iranian) agents of the organisation in those countries receive the money from the embassy. Based on specific information, this center has activities to skirt sanctions in scores of countries including Italy, Germany, and Austria.

According to internal reports of regime's officials, Austria is one of the countries that the regime has chosen to skirt sanctions in Europe.

Hamid Reza Amirinia, the director of the organisation, personally follows issues related to skirting sanctions in Austria. He has been working with the regime's lobby network in Austria in various fields for more than eight years and has set up a widespread network. Part of Amirinia's recent report to the Presidential institution reads: "Austria's capacities are very high and we have had good capacities with them since the Islamic revolution. Currently we are in contact with some groups there, regarding technology production who are indeed active in political economy too and have independent lobbies as well. It is also possible to use Austrian banks."

In June 2012 and after implementation of new sanctions, Amirinia made a one-week trip to Austria and had dozens of meetings and visits to different economic locations and commercial companies all of which were confidential.

Two Iranians and two Austrians are among covert agents of Hamid Reza Amirinia in Austria through whom he pursues his activities.

Foreign ministry's Department of Technical Co-operation

Until recently, regime's agencies, including the Center for Innovation and Technology Co-operation of the President's Office, that have been involved in skirting sanctions, were conducting their work in foreign countries independent of regime's foreign ministry. This matter gave rise to complaints by the foreign ministry because of creating problems resulting from lack of necessary co-ordination.

Therefore, the Iranian regime established a department called "Department of Technical Co-operation" at the foreign ministry and it was decided that any agency involved in skirting sanctions abroad should introduce a liaison to this department for the purpose of making co-ordination. This representative would then work with the deputy of regime's embassy in foreign countries to advance the objectives of that agency. The main objective of this department in the foreign ministry is to coordinate activities of the Center for Innovation and Technology Co-operation of the President's office. Given the current condition of sanctions, the regime's foreign ministry has accepted to get actively involved in circumventing sanctions. One such activity is transfer of cash in diplomatic pouches. In other words, through the foreign ministry and its embassies abroad and under the cover of diplomatic packages, Iranian regime is transferring cash abroad. The amount of cash in each diplomatic package has been around \$100,000 so far.

In turn, the embassy gives this money to regime's elements abroad who are involved in smuggling and skirting sanctions.

A report from foreign ministry's embassies reveals that despite the memorandum of understanding between the relevant agencies and the foreign ministry, these agencies usually do not share information of their intentions and connections with the embassies; instead, they advance their projects through front companies they have established in foreign countries.

2. Bank money-exchanges used for skirting sanctions

As financial sanctions are becoming more serious, the Iranian regime has activated money exchange systems of its banks. Behrouz Alishiri, regime's deputy minister of economic affairs and Finance, is pursuing a plan with the following components in order to skirt the sanctions:

Governmental money-exchange shops (banks' money-exchanges) are divided into regional sections (Europe, China, America, Middle East). All banks involved in money-exchange assume responsibility for one region in order to skirt sanctions in a more orderly manner.

Bank Melat created a side money exchange service three years ago and has been able to organise a system of its agents and brokers in order to be able to skirt sanctions better in the current crisis.

Bank Melat has 10 Iranian brokers and exchange agents. These brokers can transfer \$1 to \$5 million. They are not allowed to transfer more than this amount because concerns for money laundry would be raised and high amounts of money would be promptly frozen.

Melat bank brokers and agents are located in Moscow, United Arab Emirates (UAE), China and South Korea. Bank Melat officials say that this bank could transfer and deposit money in Europe as well.

Bank Saman's money-exchange brokers and agents are located in UAE and Turkey from where they deposit money for countries from these two locations.

Since individuals are more controlled with regard to transfer of money, depositing money to their accounts is more difficult than to those of companies. Therefore, the regime tries, either in Iran or abroad, to have companies do the transaction, and to this end it is trying to establish companies through its agents.

Methods of operation

Brokers and agents of banks that do the money exchange for the banks are all Iranian citizens (i.e. individuals in Iran that work with money exchange banks).

Counterparts of Iranian brokers outside the country are not Iranian; they are from different nationalities such as Russian, Turkish.

Iranian brokers locally register companies in the name of other countries' citizens (Turkish, Russian, Chinese - the company is registered outside the country and is a branch of the company inside Iran).

The company director would be an Iranian, but all of its other staff are nationals of other countries. The counterpart to the Iranian bank

(money-exchange bank) is the company director and the money is given to him in Tehran. He deposits the money to his company which is registered abroad. This way, the banks' counterparts are not Iranian entities, rather they are Turkish, Russian, Chinese, etc. companies.

In German language countries (Germany, Austria, and even Switzerland) where Turks have active banking relations, usually Turks are used for establishing a company or opening an account. Government agencies do not usually send money in their own names for banks' money exchanges. Instead, they do it and draft the money in the name of front companies.

3. National Iranian Oil Company organs used to skirt sanctions

According to precise and detailed information obtained from inside the Iranian regime by the social network of the People's Mojahedin Organization of Iran inside the country, in order to skirt the sanctions, in particular to pay for items related to regime's program on weapons of mass destruction, since the beginning of 2012, the clerical regime has drawn up a new system where expenses for smuggling items used in WMD projects are paid for through using the organs and resources of National Iranian Oil Company (NIOC).

Obtaining items needed for WMD program faces two problems:

- 1. finding the items and arranging for their transfer;
- 2. paying for the items.

To overcome these problems, the defence ministry and the National Iranian Oil Company introduced a joint plan and began to co-operate.

According to this plan, on 25 January 2012, the Iranian regime's oil minister, brigadier general Rostam Qassemi, appointed Ahmad Vahid Dastjerdi as chair of the board of directors of the Oil Pension Fund Investment Company.

Important to note here is that Ahmad Dastjerdi, is an Iranian Revolutionary Guard Coprs (IRGC) brigadier general and among

the top-ranking military officers of the Iranian regime and consequently he has no relation whatsoever to the condition of retirees in the oil industry.

However, after his appointment, Dastjerdi now has access to resources of an organ that in the first glimpse is completely legitimate and at the same time has extensive financial resources and hence can function as a perfect cover up for purchasing of weapons and equipments needed by this regime and also to pay for them through its accounts.

Ahmad Vahid Dastjerdi who has been among the most experienced commanders of IRGC since the Iran-Iraq war, has for many years been commander of the Aerospace Industries Organization (AIO), an organisation in the Defense Ministry (AIO is involved in production of WMD, especially missiles). He is in the list of sanctions of the UN Security Council Resolutions 1737 and 1747. Around the end of September 2009, during the second round of presidency of Ahmadinejad, he was deputy defence minister.

Given the prominence and the scope of skirting the sanctions, Ahmad Vahid Dastjerdi was appointed to his new function in early 2012 and at the same time maintained the position of special assistant to the minister of defence.

In order to fully prepare and organize the Oil Pension Fund Investment Company to fit the needs of the defence ministry, in 10 March 2012, Dastjerdi appointed Nasser Maleki, an IRGC staff member, as the director general of the Oil Pension Fund Investment Company.

Previously, Nasser Maleki was the head of Hemmat Missile Group. Hemmat Industrial Complex has been involved in production of ballistic missiles and is among the major organs of the AIO. Nasser Maleki has for years worked closely with Ahmad Vahid Dastjerdi in the AIO.

Utilising the resources of the Oil Pension Fund Investment Company, IRGC officer Nasser Maleki, who is an engineer, has attempted to build a system to skirt the financial sanctions in order to transfer large sums of money to provide proscribed items needed by the Iranian regime, especially for missiles and WMD, and for transferring these items. Nasser Maleki is also on the list of sanctions of Resolution 1747.