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KINGDOM OF SAUDI ARABIA

تعميم

الأخوة/ المحاسبون القانونيون المحترمون

السلام عليكم ورحمة الله وبركاته ،،،

تلقت الهيئة خطاب وزارة التجارة والاستثمار من قبل وكيل الوزارة لحماية المستهلك المكلف رقم ١٥٢٦٢ وتاريخ ١٤٤٠/٠٤/٠٦هـ، متضمناً نسخة من الدليل الإسترشادي الصادر عن شبكة إنفاذ قوانين الجرائم المالية (FinCEN) لمكاتب المحاسبين القانونيين المرخص لهم بالعمل في المملكة للاسترشاد به.

لذا آمل الإحاطة.

وتقبلوا تحياتنا ،،،

الأمين العام

د. أحمد عبدالله المغامس

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سعادة رئيس الهيئة السعودية للمحاسبين القانونيين **سلمه الله**

السلام عليكم ورحمة الله وبركاته.

إشارة إلى برقية رئيس أمن الدولة رقم (١٩٠٩٦) وتاريخ ١٤٤٠/٠٣/١٧هـ، المشار فيها إلى برقية معالي وزير الخارجية رقم (٠٥٣٧٠٧- ٤٠- ٠٠١) وتاريخ ١٤٤٠/٠٢/٣٠هـ ، بشأن تلقي الوزارة مذكرة من سفارة الولايات المتحدة الأمريكية في الرياض مشفوعها وثيقة مرفقة مفادها قيام شبكة إنفاذ قوانين الجرائم المالية (FinCEN) التابعة لوزارة الخزانة الأمريكية بتاريخ ١١ أكتوبر ٢٠١٨م بإصدار دليلاً إسترشادياً لمساعدة المؤسسات الأمريكية والأجنبية المالية في الكشف على نحو أفضل عن المعاملات غير المشروعة المحتملة ذات الصلة بإيران والإبلاغ عنها ومنعها، ويلخص الإعلان الطرق التي يحاول من خلالها النظام الإيراني الوصول إلى النظام المالي الدولي وتجنب العقوبات الأمريكية والضوابط المالية.

لذا نرفق لكم نسخة من الدليل الإسترشادي الصادر عن شبكة إنفاذ قوانين الجرائم المالية (FinCEN) وذلك لتعميمه على المحاسبين القانونيين.

آمل اطلاع سعادتكم وتوجيه المختصين باتخاذ اللازم.

وتقبلوا أطيب تحياتي وتقديري ،،،

وكيل الوزارة لحماية المستهلك المكلف

عمر بن محمد السحيباني

SOCPA
الهيئة السعودية للمحاسبين القانونيين

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FinCEN ADVISORY

FIN-2018-A006 October 11, 2018

Advisory on the Iranian Regime's Illicit and Malign Activities and Attempts to Exploit the Financial System

The Financial Crimes Enforcement Network (FinCEN) is issuing this advisory to help U.S. financial institutions (particularly banks; money services businesses (MSBs), such as virtual currency administrators and exchangers; and dealers in precious metals, stones, and jewels) better detect potentially illicit transactions related to the Islamic Republic of Iran (Iran). This advisory will also help foreign financial institutions better understand the obligations of their U.S. correspondents, avoid exposure to U.S. sanctions, and address the Anti-Money Laundering/Combating the Financing of Terrorism (AML/CFT) risks that Iranian activity poses to the international financial system.[1]

This advisory should be shared with:

- *Chief Executive Officers*
- *Chief Operating Officers*
- *Chief Compliance Officers*
- *Chief Risk Officers*
- *AML/BSA Departments*
- *Legal Departments*

The Iranian regime has long used front and shell companies to exploit financial systems around the world to generate revenues and transfer funds in support of malign conduct, which includes support to terrorist groups, ballistic missile development, human rights abuses, support to the Syrian regime, and other destabilizing actions targeted by U.S. sanctions.

This advisory highlights the Iranian regime's exploitation of financial institutions worldwide, and describes a number of typologies used by the regime to illicitly access the international financial system and obscure and further its malign activity. It also provides red flags that may assist financial institutions in identifying these methods.[2] Additionally, this advisory is intended to assist financial institutions in light of the United States' withdrawal from the Joint Comprehensive Plan of Action (JCPOA) and the re-imposition of U.S. sanctions previously lifted under the JCPOA following the 90- and 180-day wind-down periods for certain activities, while also reminding financial institutions of regulatory obligations under the Bank Secrecy Act (BSA) and the Comprehensive Iran Sanctions, Accountability, and Divestment Act of 2010 (CISADA).[3]

1. For general information on U.S. sanctions on Iran, see the "U.S. Sanctions" section on p.15 of this advisory.
2. While this advisory addresses U.S. sanctions that prohibit U.S. persons and U.S.-owned or -controlled foreign entities from engaging in transactions involving Iran, including persons "ordinarily resident" in Iran, financial institutions should not take this to mean that all transactions involving Iran, Iranian citizens, or persons with connections to Iran are suspicious or prohibited. Institutions should instead regard an Iranian nexus and the typologies listed in this advisory as factors to consider when assessing whether any specific transaction or activity has an illicit nexus or is otherwise prohibited.
3. For more information about the withdrawal of the United States from the JCPOA, please *see* https://www.treasury.gov/resource-center/sanctions/OFAC-Enforcement/Pages/20180508.aspx and https://www.treasury.gov/resource-center/sanctions/Programs/Pages/iran.aspx.

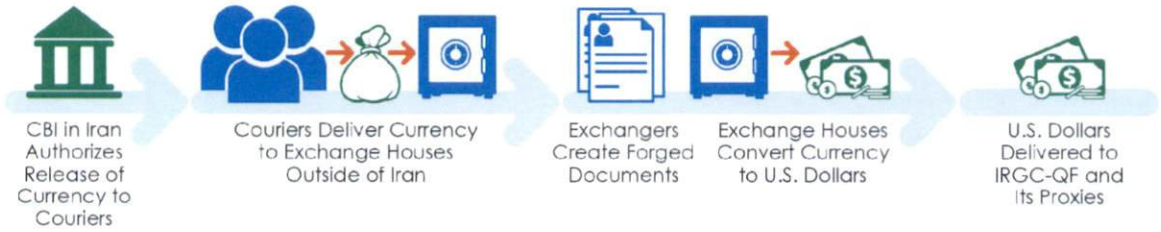
aware that some counterparty financial institutions may not be equipped to identify or address CBI officials' deceptive transactions.[7] IRGC-QF front companies are known to retrieve funds—some of which are generated by the sale of Iranian oil—in various currencies from foreign bank accounts held by the CBI and then transfer the funds back to Iran.

Use of Exchange Houses

Financial institutions are also advised to exercise appropriate due diligence when dealing with transactions involving exchange houses that may have exposure to Iran or Iranian persons, given that the Iranian regime, senior CBI officials, and the CBI have used such entities to conceal the origin of funds and procure foreign currency for the IRGC-QF.

For example, on May 10, 2018, the United States, in a joint action with the United Arab Emirates (UAE), disrupted an extensive currency exchange network in Iran and the UAE. The network procured and then transferred millions of U.S. dollar-denominated bulk cash through the UAE to the IRGC-QF. As part of this joint action, OFAC designated six individuals and three entities, including Jahan Aras Kish, the Joint Partnership of Mohammadreza Khedmati and Associates, and the Rashed Exchange.[8] The CBI was complicit in the IRGC-QF's scheme, actively supported this network's currency conversion, and enabled it to access funds that it held in its foreign bank accounts. To mask ties to Iran and particularly to the IRGC-QF, this network of cash couriers and currency exchangers established the three now-designated front companies. At least one of these companies, the Rashed Exchange, advertised its currency exchange and international money transfer business all over the world on its website and through social media in an effort to portray its activities as legitimate, while in reality its management was using the company to facilitate the transfers for the IRGC-QF. Khedmati, the managing director of Rashed Exchange, also worked with the IRGC-QF to forge documents to conceal their illicit financial activities from UAE authorities. Using these front companies, these individuals and entities procured and transferred millions in U.S. dollar-denominated bulk cash to the IRGC-QF to fund its malign activities and regional proxy groups.[9]

The diagram below depicts this type of exchange house-related scheme:



7. *See* https://home.treasury.gov/news/press-releases/sm0383.
8. *Ibid.*
9. *See* https://home.treasury.gov/index.php/news/press-releases/sm0385.

Iran's Abuse of the International Financial System

Some of the methods used by the Iranian regime to access the financial system through covert means and to further its malign activities include misusing banks and exchange houses, operating procurement networks that utilize front or shell companies, exploiting commercial shipping, and masking illicit transactions using senior officials, including those at the Central Bank of Iran (CBI). Iran also has a history of using precious metals to evade sanctions and gain access to the financial system and may seek to use virtual currencies in the future. Often, these efforts serve to fund the regime's nefarious activities, including providing funds to the Islamic Revolutionary Guard Corps (IRGC) and its Islamic Revolutionary Guard Corps-Qods Force (IRGC-QF), as well to Lebanese Hizballah, Hamas, and other terrorist groups.

The Iranian Regime's Use of CBI Officials and Exchange Houses to Facilitate Malign Activity

Use of CBI Officials

Senior officials of the CBI have played a critical role in enabling illicit networks, using their official capacity to procure hard currency and conduct transactions for the benefit of the IRGC-QF and its terrorist proxy group, Lebanese Hizballah.[4] The CBI has also been complicit in these activities.

On May 15, 2018, the Office of Foreign Assets Control (OFAC) designated then-CBI Governor Valiollah Seif and the assistant director of the CBI's International Department, Ali Tarzali, adding them to OFAC's List of Specially Designated Nationals and Blocked Persons (SDN List) for conducting transactions through Iraq's banking sector for the benefit of the IRGC-QF and Lebanese Hizballah, which has acted as a proxy for the IRGC-QF.[5] Specifically, Valiollah Seif conspired with the IRGC-QF to move millions of dollars, in a variety of currencies, through the international financial system to allow the IRGC-QF to fund its activities abroad. Seif also supported the transfer of IRGC-QF-associated funds to al-Bilad Islamic Bank, an Iraq-based bank that was also designated by OFAC. Ali Tarzali worked with Lebanese Hizballah and proposed that the terrorist group send funds through al-Bilad Islamic Bank. On May 15, 2018, OFAC also designated the Chairman and Chief Executive of al-Bilad Islamic Bank, who acted as an intermediary to enable and conceal these transactions.[6]

Financial institutions should be aware that the U.S. Department of the Treasury has repeatedly observed CBI officials and the IRGC-QF using regional financial institutions as intermediaries to conceal illicit transactions. In exercising appropriate due diligence, financial institutions should be

4. *See* https://home.treasury.gov/index.php/news/press-releases/sm0385. In addition, on May 15, 2018 and May 17, 2018, OFAC issued new designations relating to the Central Bank of Iran and its senior officials.

5. *See* https://home.treasury.gov/news/press-releases/sm0385.

6. *See* https://www.treasury.gov/resource-center/sanctions/OFAC-Enforcement/Pages/20180515.aspx and https://home.treasury.gov/index.php/news/press-releases/sm0385.

As financial institutions are aware, during previous periods of heightened sanctions pressure, Iran relied heavily on third-country exchange houses and trading companies to move funds to evade sanctions.[10] As the sanctions on Iran that were lifted under the JCPOA are coming back into effect, Iranian financial institutions can be expected to increase the use of these or other evasive practices. These practices include the use of third-country exchange houses or trading companies to act as money transmitters in processing funds transfers through the United States to third-country beneficiaries, in support of business with Iran that is not exempt or otherwise authorized by OFAC. These third-country exchange houses or trading companies frequently lack their own U.S. dollar accounts and instead rely on the correspondent accounts of their regional banks to access the U.S. financial system. Often these entities are located in jurisdictions considered high risk for transactions implicating OFAC sanctions, and they appear to process primarily commercial transactions rather than personal remittances, which are authorized by OFAC.

OFAC's January 10, 2013 advisory identified the following evasive practices used by such third-country exchange houses or trading companies: omission of references to Iranian addresses, omission of names of Iranian persons or entities in the originator or beneficiary fields, and transmission of funds without referencing the involvement of Iran or the designated persons.[11]

Financial institutions should be aware when monitoring payments involving third-country exchange houses or trading companies that, as informed by such firms' risk profile, a financial institution may be processing commercial transactions related to Iran or Iranian persons. As appropriate, financial institutions should consider (1) requesting additional information from correspondents on the nature of such transactions and the parties involved; (2) while monitoring these payments, conducting account and transaction reviews for individual exchange houses or trading companies that have repeatedly violated or attempted to violate U.S. sanctions against Iran; and (3) contacting their correspondents that maintain accounts for, or facilitate transactions on behalf of, third-country exchange houses or trading companies that engage in one of the above-referenced examples in order to request additional information and to alert them to the use of these practices.

10. Third-country exchange houses are financial institutions licensed to deal in foreign exchange and transmit funds on behalf of individuals and companies. Trading companies are entities that are not licensed to transmit funds, but in practice operate as exchange houses and rely upon their bank accounts to transmit funds on behalf of third parties. *See* https://www.treasury.gov/resource-center/sanctions/Programs/Documents/20130110_iran_advisory_exchange_house.pdf.

11. In 2013, OFAC issued an advisory that highlighted some of the practices used at that time to circumvent U.S. and international economic sanctions concerning Iran, including relying heavily on third-country exchange houses and trading companies to move funds. *See* https://www.treasury.gov/resource-center/sanctions/Programs/Documents/20130110_iran_advisory_exchange_house.pdf. Neither the 2013 OFAC advisory nor this advisory are intended to suggest that U.S. financial institutions close accounts they hold for third-country exchange houses and/or trading companies. Additionally, neither advisory should be interpreted as a signal that third-country exchange houses and/or trading companies are necessarily facilitating illicit finance.

Iran's Use of Procurement Networks

Malign Iran-related actors use front and shell companies[12] around the world to procure technology and services that allow them to evade sanctions and continue their destabilizing behaviors. Through these procurement networks, Iran has gained goods and services related to currency counterfeiting, dual-use equipment, and the commercial aviation industry. As part of a risk-based approach, financial institutions should familiarize themselves with these deceptive practices and take steps to avoid direct or indirect facilitation of them.

Printing Equipment and Materials for Counterfeiting Currency

In November 2017, OFAC designated two individuals, Reza Heidari and Mahmoud Seif, and four entities, Pardazesh Tasvir Rayan Co., ForEnt Technik GmbH Co., Printing Trade Center GmbH, and Tejarat Almas Mobin Holding, for their respective roles assisting the IRGC-QF to counterfeit currency. This network used two German-based front companies to deceive European suppliers, circumvent European export restrictions, and surreptitiously procure advanced printing machinery, security printing machinery, and raw materials such as watermarked paper and specialty inks. The network used these items to print counterfeit Yemeni bank notes for the IRGC-QF. Mahmoud Seif was previously involved with the procurement of weapons for the IRGC-QF.[13]

Dual-Use Equipment Procurement for Ballistic Missile Proliferation

In February 2017, OFAC designated multiple individuals and entities that are part of the Abdollah Asgharzadeh network for the procurement of dual-use and other goods on behalf of organizations involved in Iran's ballistic missile programs. This network coordinated procurement through intermediary companies that obfuscated the final recipient of the goods. Asgharzadeh and his associates relied on a network of trusted China-based brokers and their companies to assist his procurement of dual-use and other goods.[14]

12. Shell companies are typically non-publicly traded corporations or limited liability companies (LLCs) that have no physical presence beyond a mailing address and generate little to no independent economic value. *See* FinCEN Guidance FIN-2006-G014 "Potential Money Laundering Risks Related to Shell Companies" (November 2006) and SAR Activity Review: Issue 1 (October 2000), Issue 2 (June 2001), and Issue 7 (August 2004).

13. *See* https://www.treasury.gov/press-center/press-releases/Pages/sm0219.aspx.

14. OFAC also designated MKS International, a UAE-based company that used multiple front companies in order to circumvent export laws and sanctions to procure technology and/or materials to support Iran's ballistic missile program, as well as for acting for or on behalf of, or providing support to, Iran's IRGC-QF. *See* https://www.treasury.gov/press-center/press-releases/Pages/as0004.aspx.

Commercial Aviation Industry

Designated Iranian airlines and their agents and affiliates have used deceptive schemes to procure aviation-related materials using front companies. Treasury has issued numerous rounds of sanctions related to efforts by designated Iranian airlines to evade sanctions via the use of front or shell companies.[15]

Financial institutions providing services to the commercial aviation industry should be aware of prior actions by designated Iranian airlines to evade sanctions, and they are advised to exercise appropriate due diligence to ensure compliance with legal requirements. Foreign financial institutions are reminded that they may be subject to sanctions for knowingly conducting significant transactions for or with certain Iran-related persons[16] (such as Mahan Air, Caspian Air, Dena Airways, Meraj Air, Pouya Air, Al-Naser Wings Airlines, Syrian Air, Khors Aircompany, Dart Airlines, and UM Air), including prohibitions or strict conditions on their ability to open or maintain correspondent or payable-through accounts in the United States. Non-U.S. persons, including foreign financial institutions, may also be subject to designation and listing on the SDN List for, e.g., providing material support to designated Iranian airlines.

Mahan Air

For many years, the Iranian commercial airline Mahan Air has transferred weapons, funds, and people on behalf of the IRGC-QF and provided support to the Syrian Assad regime and Lebanese Hizballah. In 2011, OFAC designated Mahan Air for providing financial, material, and technological support to the IRGC-QF. To evade sanctions, Mahan Air front companies have negotiated sales contracts and obtained U.S. parts and services for Mahan Air's aircraft in violation of U.S. sanctions.[17] These front companies facilitate the transfer of funds to vendors and service providers on behalf of Mahan Air, while also aiding in the procurement of goods, such as aviation parts and services from neighboring countries, Europe, and Asia. The aviation-related materials are then shipped to either the same company, or a different front company,

15. For example, front companies or other companies that have been designated by OFAC for assisting designated Iranian airline Mahan Air in procuring aircraft and related parts and services include Blue Sky Aviation Co FZE; Pioneer Logistics; Asian Aviation Logistics; Avia Trust FZE; Grandeur General Trading FZE ; Aviation Capital Solutions; Aircraft, Avionics, Parts & Support Ltd.; and HSI Trading FZE. For OFAC press releases related to Mahan Air sanctions *see* October 12, 2011; September 19, 2012; May 31, 2013; February 6, 2014; August 29, 2014; May 21, 2015; March 24, 2016; September 14, 2017; October 16, 2017; May 24, 2018; and July 9, 2018 at https://home.treasury.gov/news/press-releases.

16. These Iran-related persons include: (1) Iranian persons on the SDN List; (2) the IRGC and its designated agents or affiliates; and (3) any other person on the SDN List designated in connection with Iran's proliferation of weapons of mass destruction or their means of delivery or Iran's support for international terrorism.

17. *See* https://www.treasury.gov/press-center/press-releases/Pages/jl2618.aspx, https://www.treasury.gov/press-center/press-releases/Pages/jl0395.aspx and https://www.treasury.gov/press-center/press-releases/Pages/jl2287.aspx.

sometimes in another country, to be forwarded to Iran. Mahan Air has moved payments through several front companies and financial institutions in the United States, Canada, the United Kingdom, Belize, France, Belgium, Czech Republic, the UAE, Bahrain, Saudi Arabia, Kyrgyzstan, Sri Lanka, and Bangladesh.

Mahan Air and other designated Iranian airlines' use of front companies is illustrated by recent Treasury actions targeting a procurement network. For example, on May 24, 2018, Treasury designated a network of Turkish front companies that procured U.S.-origin parts for Mahan Air. This network purchased aviation parts—including export-controlled U.S. goods such as U.S.-origin engines—from foreign vendors. The parts were delivered to Istanbul and then forwarded to Mahan Air.[18] OFAC has previously designated airlines in Ukraine, Kyrgyzstan, and Iraq that have served as intermediaries for Mahan Air to acquire aircraft, as well as front companies in the UAE, Thailand, Turkey, and the United Kingdom that purchase parts or facilitate payments on behalf of Mahan Air. For example, in May 2015, Treasury designated Iraq-based Al-Naser Airlines, now operating as Al-Naser Wings Airlines, for purchasing nine Airbus aircraft for Mahan Air from unwitting European suppliers. Al-Naser Airlines also attempted to purchase at least two Airbus aircraft located in the United States for Mahan Air, with payments for the planes wired from the account of a Dubai-based general trading company. Additionally, on July 9, 2018, Treasury designated a Malaysia-based general sales agent (GSA) of Mahan Air, Mahan Travel and Tourism Sdn Bhd, which provides Mahan with reservation and ticketing services. This action notified to the aviation community of the sanctions risk of maintaining commercial relationships with Mahan Air.[19] Likewise, on September 14, 2018, Treasury designated Thailand-based My Aviation Company Limited for acting for or on behalf of Mahan Air. This Thailand-based company disregarded numerous U.S. warnings, issued publicly and delivered bilaterally to the Thai government, to sever ties with Mahan Air.[20]

18. *See* https://home.treasury.gov/news/press-releases/sm0395.

19. *See* https://home.treasury.gov/news/press-releases/sm423.

20. *See* https://home.treasury.gov/news/press-releases/sm484.

Iran-Related Shipping Companies' Access to the Financial System

During previous periods of heightened sanctions pressure, Treasury identified Iranian or Iran-related companies using deceptive shipping practices to evade U.S. sanctions. As detailed in previous OFAC advisories and designation actions, these practices include: the use of falsified documents,[21] the reflagging of vessels,[22] and the involvement of third parties, such as brokers and trading companies, to mask the underlying payments and business activity with Iran.[23] For example, in the pre-JCPOA period, Treasury identified shipping companies around the world that falsified documents to hide ships docking in Iranian ports and the accompanying trade-related payments. In addition, in the past, as the United States has added entities or individuals to OFAC's SDN List, there have been instances where a vessel's ownership or operation was transferred from a newly-designated person to a front company or other person acting for or on behalf of the designated person.[24]

As the sanctions on Iran that were lifted under the JCPOA come back into effect following the 90-and 180-day wind-down periods, Iranian shipping companies may return to the use of these or other evasive practices. Financial institutions may see indications of these deceptive shipping practices in the information contained in international wires, payment requests, and letters of credit. Documents may also be falsified, and include bills of lading and shipping invoices to conceal shipping routes, embarkation ports, or shipping agents. Financial institutions may find maritime databases and reports—such as those generated by the International Maritime Bureau or other available services—helpful when verifying trade-related documents.[25] Financial institutions should be aware of changes regarding the issuing or writing of letters of credit and other trade-related financial transactions. Financial institutions should report those changes in their SAR filings if the changes appear to be related to malign activity. In addition, among other deceptive conduct, Iranian vessels may attempt to hide their origin and purpose by potentially fabricating

21. *See* https://www.treasury.gov/resource-center/sanctions/Programs/Documents/20110331_advisory.pdf. In this March 31, 2011 advisory, OFAC alerted shippers, importers/exporters, and freight forwarders to practices used by the Islamic Republic of Iran Shipping Lines (IRISL), which at the time was designated pursuant to E.O. 13382, and companies acting on its behalf to evade U.S. and international economic sanctions by hiding the involvement of IRISL in shipping transactions, including (1) using container prefixes registered to another carrier; (2) omitting or listing invalid, incomplete, or false container prefixes in shipping container numbers; and/or (3) naming non-existent ocean vessels in shipping documents. *See* https://www.treasury.gov/press-center/press-releases/Pages/hp1130.aspx. IRISL and its affiliates, as well as a large number of vessels in which these entities held an interest, were removed from OFAC's SDN List on January 16, 2016 in connection with the JCPOA. No later than November 5, 2018, OFAC will re-impose, as appropriate, the sanctions that applied to persons removed from SDN List and/or other lists maintained by OFAC on January 16, 2016.

22. *See* https://www.treasury.gov/resource-center/sanctions/Programs/Documents/ofac_irisl_advisory_07192012.pdf. In this July 19, 2012 advisory, OFAC alerted the maritime industry that IRISL operated vessels despite their flags having been revoked. International sanctions at the time, and IRISL's efforts to evade them through deceptive practices, led to increased vigilance by the maritime industry and prompted an increasing number of countries to revoke or refuse to issue a flag to vessels in which IRISL or its affiliates had an interest. *See* https://www.treasury.gov/press-center/press-releases/Pages/hp1130.aspx and https://www.treasury.gov/press-center/press-releases/Pages/jl1933.aspx.

23. *See* https://www.treasury.gov/press-center/press-releases/Pages/TG981.aspx.

24. *See* https://www.treasury.gov/press-center/press-releases/Pages/jl1933.aspx and https://www.treasury.gov/press-center/press-releases/Pages/TG981.aspx.

25. *See* https://www.icc-ccs.org/icc/imb.

vessel registration and flag credentials at ports of call and canal entrances. Malign Iran-related actors and sanctioned entities engage in these activities to bypass financial institutions' SDN filters so they may evade sanctions. Financial institutions should continue to conduct appropriate due diligence to ensure they are not directly or indirectly providing services to sanctioned parties.

The Iranian Regime's Illicit Use of Precious Metals

Iran has previously used precious metals, such as gold, to evade U.S. sanctions and facilitate the sale of Iranian oil and other goods abroad. In response to these schemes, the United States enacted sanctions specifically targeting Iran's trade in precious metals, including section 1245 of the Iran Freedom and Counter-Proliferation Act of 2012. As the United States re-imposes sanctions lifted under the JCPOA, financial institutions should be aware of prior schemes used by entities with a nexus to Iran to evade sanctions using gold and other commodities.

Virtual Currency

Since 2013, Iran's use of virtual currency includes at least $3.8 million worth of bitcoin-denominated transactions per year. While the use of virtual currency in Iran is comparatively small, virtual currency is an emerging payment system that may provide potential avenues for individuals and entities to evade sanctions. Despite public reports that the CBI has banned domestic financial institutions from handling decentralized virtual currencies, individuals and businesses in Iran can still access virtual currency platforms through the Internet. For example, virtual currency can be accessed through: (1) Iran-located, Internet-based virtual currency exchanges; (2) U.S.- or other third country-based virtual currency exchanges; and (3) peer-to-peer (P2P) exchangers.

Institutions should consider reviewing blockchain ledgers for activity that may originate or terminate in Iran. Institutions should also be aware that the international virtual currency industry is highly dynamic; new virtual currency businesses may incorporate or operate in Iran with little notice or footprint. Further, P2P exchangers—natural or legal persons who offer to buy, sell, or exchange virtual currency through online sites and in-person meetups—may offer services in Iran. These P2P exchangers may operate as unregistered foreign MSBs in jurisdictions that prohibit such businesses; where virtual currency is hard to access, such as Iran; or for the purpose of evading the prohibitions or restrictions in place against such businesses or virtual currency exchanges and other similar business in some jurisdictions. Institutions can utilize technology created to monitor open blockchains and investigate transactions to or from P2P exchange platforms.

Activity of these exchangers may involve wire transactions from many disparate accounts or locations combined with transfers to or from virtual currency exchanges. These transactions may occur when account holders fund an account or withdraw value from an account, especially if the foreign exchanger operates in multiple currencies.

Financial institutions and virtual currency providers that have BSA and U.S. sanctions obligations should be aware of and have the appropriate systems to comply with all relevant sanctions requirements and AML/CFT obligations. Sanctions requirements may include not only screening

resolutions; (3) ensuring an adequate and enforceable customer due diligence regime; (4) ensuring the full independence of the Financial Intelligence Unit and requiring the submission of STRs [Suspicious Transaction Reports] for attempted transactions; (5) demonstrating how authorities are identifying and sanctioning unlicensed money/value transfer service providers; (6) ratifying and implementing the Palermo and TF [Terrorist Financing] Conventions and clarifying the capability to provide mutual legal assistance; (7) ensuring that financial institutions verify that wire transfers contain complete originator and beneficiary information; (8) establishing a broader range of penalties for violations of the ML [Money Laundering] offense; and (9) ensuring adequate legislation and procedures to provide for confiscation of property of corresponding."[30] The FATF will decide upon the appropriate action in October 2018 if Iran has not by then enacted the necessary amendments to its AML and CFT laws and ratified the Terrorist Financing and Palermo Conventions. All available advisories on FATF Plenaries, including previous years, are available at https://www.fincen.gov/resources/advisoriesbulletinsfact-sheets/advisories.

Red Flags Related to Deceptive Iranian Activity

The following red flags may help financial institutions identify suspicious activity involving the schemes discussed above. In applying these red flags, financial institutions are advised that no single transactional red flag necessarily indicates suspicious activity, and institutions should ensure that their assessments are in line with their internal risk profile. Financial institutions should consider additional indicators and the surrounding facts and circumstances, such as a customer's historical financial activity and the existence of other red flags, before determining that a transaction is suspicious. Financial institutions should also perform additional inquiries and investigations where appropriate. Foreign financial institutions may find the information beneficial for their risk and threat assessments and suspicious transaction reporting requirements. The appropriate financial crimes compliance/sanctions compliance within the financial institution should be apprised of any transactions that are determined to involve Iran.

Illicit Activity by the CBI or Its Officials

1. ***Use of Personal Account.*** The CBI or CBI officials route transactions to personal accounts instead of central bank or government-owned accounts. Individuals or entities with no central bank or government affiliation withdraw funds from such accounts.

2. ***Unusual Wire Transfers.*** The CBI engages in multiple wire transfers to banks or financial institutions that the CBI would not normally engage in, or that are not related to traditional central bank activity.[31]

30. *See* http://www.fatf-gafi.org/publications/high-riskandnon-cooperativejurisdictions/documents/public-statement-june-2018.html.

31. Effective November 5, 2018, foreign financial institutions will be subject to correspondent or payable-through account sanctions for conducting or facilitating certain significant financial transactions with the CBI, pursuant to section 1245 of the National Defense Authorization Act for Fiscal Year 2012 (NDAA).

against the SDN List but also appropriate steps to comply with other OFAC-administered sanctions programs, including those that impose import and/or export restrictions with respect to particular jurisdictions.[26] Further, a non-U.S.-based exchanger or virtual currency provider doing substantial business in the United States is subject to AML/CFT obligations and OFAC jurisdiction.

U.S. individuals and institutions involved in virtual currency should be aware of OFAC's March 2018 Frequently Asked Questions (FAQs) on sanctions issues associated with virtual currencies.[27] The FAQs remind U.S. persons that their compliance obligations with respect to transactions are the same, regardless of whether a transaction is denominated in virtual currency or not. OFAC also states as a general matter that U.S. persons and persons otherwise subject to OFAC jurisdiction, including firms subject to OFAC jurisdiction that facilitate or engage in online commerce or process transactions using "digital currency," are responsible for ensuring that they do not engage in unauthorized transactions prohibited by OFAC sanctions, such as dealings with blocked persons or property, or engaging in prohibited trade or investment-related transactions.[28] Prohibited transactions include transactions that evade or avoid, have the purpose of evading or avoiding, cause a violation of, or attempt to violate prohibitions imposed by OFAC under various sanctions authorities. Additionally, persons that provide financial, material, or technological support for or to a designated person may be designated by OFAC under the relevant sanctions authority.[29]

Financial Action Task Force's Findings Related to Iran's Anti-Money Laundering/Combating the Financing of Terrorism Regime

The Financial Action Task Force (FATF) has listed Iran as a jurisdiction with systemic deficiencies in its AML/CFT regime. Despite Iran's commitment in June 2016 to an action plan with the FATF to address its AML/CFT deficiencies, Iran has failed to complete the majority of its action plan. The FATF therefore continues to call upon its members and all jurisdictions to advise their financial institutions to apply enhanced due diligence measures to business relationships and transactions with natural and legal persons from Iran.

In addition to keeping Iran on its Public Statement, on June 29, 2018, the FATF expressed disappointment with Iran's failure to implement its action plan, and it reiterated its concern with the terrorist financing risk emanating from Iran and the threat this poses to the international financial system. The FATF noted that Iran "should fully address its remaining action items, including by: (1) adequately criminalising terrorist financing, including by removing the exemption for designated groups 'attempting to end foreign occupation, colonialism and racism'; (2) identifying and freezing terrorist assets in line with the relevant United Nations Security Council

26. If a financial institution or virtual currency provider has questions concerning OFAC sanctions, they can either call OFAC's Toll-Free Hotline at 1-800-540-6322, or email OFAC's Feedback Account at OFAC_Feedback@treasury.gov.

27. *See* FAQ 559 to 563, available at https://www.treasury.gov/resource-center/faqs/Sanctions/Pages/faq_compliance.aspx.

28. For the purposes of OFAC sanctions programs, the term "digital currency" includes digital fiat currency or sovereign cryptocurrency, virtual currency (non-fiat), and digital representations of fiat currency.

29. *See* FAQ 560, available at https://www.treasury.gov/resource-center/faqs/Sanctions/Pages/faq_compliance.aspx.

3 ***Use of Forged Documents.*** Front companies acting for or on behalf of designated persons use forged documents to conceal the identity of parties involved in the transactions. For example, as a part of the IRGC-QF's currency exchange network scheme, documents were forged by an IRGC-QF front company manager to mislead authorities and conceal the true customers of the entities involved in the scheme.

Illicit Activity through Exchange Houses

4 ***Use of Multiple Exchange Houses.*** Customers may have transactions moving through multiple exchange houses, adding additional fees and costs as they progress through the system. The fees, number of transactions, and patterns of transactions are atypical to standard and customary commercial practices.

5 ***Multiple Depositors.*** Account holders that receive deposits—that do not appear to match the customer's profile or provided documentation—from numerous individuals and entities.

Use of Procurement Networks

6 ***Shell or Front Companies.*** Transactions involving companies that originate with, or are directed to, entities that are shell corporations, general "trading companies", or companies that have a nexus with Iran. For example, a company has an affiliate in Iran or is owned by individuals known to be loyal to the Iranian regime, and appears to lack a general business purpose. Iran uses front companies incorporated across the world, including in Asia and Europe. Other indicators of possible shell companies include opaque ownership structures, individuals/entities with obscure names that direct the company, or business addresses that are residential or co-located with other companies.

7 ***Suspicious Declarations.*** Declarations of information that are inconsistent with other information, such as previous transaction history or nature of business. Declarations of goods that are inconsistent with the associated transactional information.

8 ***Unrelated Business.*** Transactions that are directed to companies that operate in unrelated businesses, and which do not seem to comport with the Customer Due Diligence (CDD) and other customer identification information collected during client onboarding and subsequent refreshes.

Illicit Procurement of Aircraft Parts

9 ***Use of Front Companies and Transshipment Hubs to Source Aircraft Parts.*** Financial institutions that facilitate commercial aviation-related financial transactions where the beneficial ownership of the counterparty is unknown and the delivery destination is a common transshipment point for onward delivery to Iran. Iran-linked persons have attempted to source U.S.-origin aircraft and related parts from third countries known to be hubs for maintenance, repair, and overhaul operations, and then use front companies located in third-countries to conceal or obfuscate the ultimate Iranian beneficiary of the U.S.-origin aircraft, parts, and aviation-related materials.

10 ***Misrepresentation of Sanctions.*** Misrepresenting to suppliers, dealers, brokers, re-insurers, and other intermediaries that sanctions against Iran have been lifted or are no longer applicable as a result of the JCPOA, or falsely claiming without supporting documentation that an OFAC license has been obtained.

Iran-Related Shipping Companies' Access to the U.S. Financial System

11 ***Incomplete and Falsified Documentation.*** Transactions and wire transfers that include bills of lading with no consignees or involving vessels that have been previously linked to suspicious financial activities. Documentation, such as bills of lading and shipping invoices, submitted with wire and payment requests that may appear to be falsified, or with key information omitted, in an attempt to hide the Iranian nexus.

12 ***Inconsistent Documentation for Vessels Using Key Ports.*** Inconsistencies between shipping-related documents and maritime database entries that are used for conducting due diligence. For example, the maritime database may indicate that a vessel docked in an Iranian port, even though this information is not included in the shipping documents submitted to financial institutions for payment processing. Major ports in Iran are Bandar Abbas, Assaluyeh, and Bandar-e Emam Khomenyi, which is also known as Abadan. Port cities on the Gulf include: Ahvaz, Bushehr, Bandar-e Lengeh, Bandar-e Mahshahr, Chabahar, Kharg Island, and Lavan Island. Kharg Island and Lavan Island are major oil and gas ports.

13 ***Previous Ship Registration to Sanctioned Entities.*** Vessels whose ownership or operation is transferred to another person—following OFAC's designation of its owner or operator—on behalf of the designated person, but the designated owner or operator maintains an interest in the vessel.

Suspicious Funds Transfers

14 ***Lack of Information Regarding Origin of Funds.*** Wire transfers or deposits that do not contain any information about the source of funds, contain incomplete information about the source of funds, or do not match the customer's line of business.

15 ***Unusual or Unexplainable Wire Transfers.*** Multiple, unexplained wire transfers and transfers that have no apparent connection to a customer's profile. For example, individuals may claim that the unusually high-value wire transfers they receive from one or more foreign countries are merely funds sent from relatives in Iran. In addition, wire transfers to accounts in the United States from high-risk jurisdictions that have no apparent connection to the customer's line of business.

16 ***Using Funnel Accounts.*** Third parties from across the United States who deposit funds into the accounts of U.S.-based individuals with ties to Iran.[32] The deposits and associated transactions do not match the account holder's normal geographical footprint, and the source of the funds is unknown or unclear.

17 ***Structuring Transactions.*** U.S. persons send or receive money to or from Iran by structuring the cash portion of the transactions to avoid the currency transaction reporting threshold of $10,000. Individuals returning to the United States from Iran also may make large deposits of monetary instruments rather than cash.

18 ***Gold.*** Given Iran's prior use of gold as a substitute for cash to evade U.S. sanctions, financial institutions should consider conducting additional due diligence on transactions related to precious metals, particularly in geographic regions in close proximity to Iran (such as Turkey) that engage in significant gold-related transactions. Additionally, financial institutions may notice transactions not obviously linked to Iran, but related to the purchase of unusually high volumes of gold.

Virtual Currency

19 ***Logins from Iranian Internet Protocol Addresses or with Iranian Email.*** Internet Protocol (IP) login activity from entities in Iran or using an Iranian email service in order to transact virtual currencies through a virtual currency exchange. In such cases, financial institutions may also be able to provide associated technical details such as IP addresses with time stamps, device identifiers, and indicators of compromise that can provide helpful information to authorities.[33]

20 ***Payments to/from Iranian Virtual Currency Entity.*** A customer or correspondent payment to or from virtual currency exchanges that appear to be operating in Iran.

21 ***Peer-to-Peer (P2P) Exchangers.*** Unexplained transfers into a customer account from multiple individual customers combined with transfers to or from virtual currency exchanges. Wire transfers are usually associated with funding an account or withdrawing value, especially with foreign exchanges that may operate in multiple currencies.

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32. Funnel account activity often involves a customer structuring currency deposits into an account in one geographic area, with the funds subsequently withdrawn in a different geographic region with little time elapsing between deposit and withdrawal. The rapid flow of funds may also span a large geographic area between the deposits and withdrawals, including instances where the deposit location is thousands of miles away from the withdrawal location. In some instances, these disparate deposits have been consolidated into a single account and withdrawn from the consolidated account. The currency deposits and withdrawals often have no apparent lawful or business purpose and do not reflect the stated occupation of the account holder. For a detailed description of funnel accounts, *see* https://www.fincen.gov/resources/advisories/fincen-advisory-fin-2012-a006 and https://www.fincen.gov/resources/advisories/fincen-advisory-fin-2014-a005.

33. *See* Question #1 in "FAQs regarding the Reporting Cyber-Events, Cyber-Enabled Crime, and Cyber-Related Information through SARs" (October 2016) as well as "Advisory to Financial Institutions on Cyber-Events and Cyber-Enabled Crime," available at: https://www.fincen.gov/sites/default/files/shared/FAQ_Cyber_Threats_508_FINAL.PDF and https://www.fincen.gov/sites/default/files/advisory/2016-10-25/Cyber%20Threats%20Advisory%20-%20FINAL%20508_2.pdf.

FinCEN expects that Iranian financial institutions, the Iranian regime, and its officials will increase their efforts to evade U.S. sanctions to fund malign activities and secure hard currency for the Government of Iran, following the re-imposition of sanctions lifted under the JCPOA. Treasury and the U.S. Government are interested in information related to Iran's efforts outlined in this advisory, as well as information pertaining to how Iran or Iranian entities subject to sanctions, including the CBI, otherwise evade the sanctions and access the U.S. financial system.

This advisory does not describe all of the methods the Government of Iran may use to gain access to the U.S. financial system or evade sanctions, such as using funnel accounts or informal value transfer systems (IVTS).[34] FinCEN encourages financial institutions to review past advisories relating to Iran, including FinCEN Advisory FIN-2018-A004 "Advisory on the FATF-Identified Jurisdictions with AML/CFT Deficiencies" (September 2018),[35] FinCEN Advisory FIN-2010-A008 "Update on the Continuing Illicit Finance Threat Emanating from Iran" (June 2010),[36] FinCEN Advisory FIN-2008-A002 "Guidance to Financial Institutions on the Continuing Money Laundering Threat Involving Illicit Iranian Activity" (March 2008),[37] and FinCEN Advisory FIN-2007-A001 "Guidance to Financial Institutions on the Increasing Money Laundering Threat Involving Illicit Iranian Activity" (October 2007).[38]

U.S. Sanctions

U.S. primary sanctions on Iran are those sanctions administered by OFAC that broadly prohibit U.S. persons and U.S.-owned or -controlled foreign entities from engaging in virtually all transactions or dealings with or involving Iran, the Government of Iran, or Iranian financial institutions, unless the transactions are exempt from regulation or expressly authorized by the U.S. Government.[39] These prohibitions also apply to transactions in or transiting through the United States, as well as other types of activities. Section 560.204 of the Iranian Transactions and Sanctions Regulations (ITSR) prohibits the exportation of goods, services (including financial services), or technology directly or indirectly from the United States, or by a U.S. person, to Iran. Pursuant to this provision, U.S. financial institutions are prohibited from opening or maintaining correspondent accounts for or on behalf of Iranian financial institutions. Absent an exemption or OFAC authorization, foreign persons, including foreign financial institutions, are prohibited from processing transactions to or through the United States in violation of this provision, including transactions through U.S. correspondent accounts for or on behalf of Iranian financial institutions, other Iranian persons, or where the benefit is otherwise received in Iran.

34. The term Informal Value Transfer System (IVTS), as originally stated in the March 2003 "IVTS Advisory," refers to any system, mechanism, or network of people that receives money for the purpose of making the funds or an equivalent value payable to a third party in another geographic location, whether or not in the same form. *See* https://www.fincen.gov/sites/default/files/shared/advis33.pdf.

35. *See* https://www.fincen.gov/resources/advisories/fincen-advisory-fin-2018-a004.

36. *See* https://www.fincen.gov/resources/advisories/fincen-advisory-fin-2010-a008.

37. *See* https://www.fincen.gov/resources/advisories/fincen-advisory-fin-2008-a002.

38. *See* https://www.fincen.gov/resources/advisories/fincen-advisory-fin-2007-a001.

39. *See* Iranian Transactions and Sanctions Regulations, 31 CFR Part 560.

The importation into the United States of any goods or services of Iranian origin or owned or controlled by the Government of Iran is also prohibited unless exempt from regulation or expressly authorized by the U.S. Government. There are also prohibitions on re-exports by non-U.S. persons of goods with 10 percent or more controlled U.S. origin content.

U.S. persons are also subject to broad prohibitions on dealings with, and must block the property and interests in property of, among others, Iran-related persons designated pursuant to authorities targeting specific malign conduct, such as support for terrorism, proliferation of weapons of mass destruction or their means of delivery, and human rights abuses.[40] All Iranian financial institutions are blocked under Executive Order 13599 and section 560.211 of the ITSR and, absent an exemption or OFAC authorization, U.S. persons must block the property and interests in property of all Iranian financial institutions.

Pursuant to the Iranian Financial Sanctions Regulations (IFSR) and multiple statutory and executive authorities, foreign financial institutions may be subject to sanctions for knowingly conducting significant transactions for or with certain Iran-related persons, including prohibitions or strict conditions on their ability to open or maintain correspondent or payable-through accounts in the United States. Non-U.S. persons, including foreign financial institutions, may also be subject to blocking sanctions for, e.g., providing material support to designated persons. U.S. and non-U.S. financial institutions should be conscious of their obligations under OFAC sanctions to prevent any use (both direct and indirect) of their U.S. correspondent accounts for transactions involving an Iranian financial institution. OFAC has issued penalties to both U.S. and non-U.S. financial institutions for processing prohibited transactions through the U.S. financial system that involve an indirect, underlying interest of Iranian individuals and entities, including Iranian financial institutions. As a result, the industry should continue to develop controls designed to curtail indirect involvement of Iranian persons in transactions that transit through or otherwise involve the U.S. financial system. In many cases, this requires institutions to employ higher Know-Your-Customer (KYC) and CDD requirements for Iranian entities or clients who do business with Iran.

In addition, U.S. and non-U.S. financial institutions should continue to implement robust and multi-tiered levels of screening and review for transactions originating from or otherwise involving jurisdictions in close proximity to Iran. Financial institutions engaged in cross-border wire activity should be aware of transactions involving jurisdictions with strong geographical and economic ties to Iran. These practices generally result in significant oversight of correspondent accounts that may involve Iranian interests, as well as create a relatively high-degree of vigilance related to payments and funds transfers on behalf of Iran-related individuals and entities.

Additional information on these sanctions, including sanctions that are being re-imposed following the withdrawal of the United States from the JCPOA, can be found at https://www.treasury.gov/resource-center/sanctions/Programs/Pages/iran.aspx#legal.

40. *See, e.g.*, E.O. 13224 and the Global Terrorism Sanctions Regulations, 31 CFR Part 594; E.O. 13382 and the Weapons of Mass Destruction Proliferators Sanctions Regulations; and E.O. 13553 and the Iranian Human Rights Abuses Sanctions Regulations, 31 CFR Part 562.

Reminder of Regulatory Obligations for U.S. Financial Institutions

Consistent with existing regulatory obligations, U.S. financial institutions should take reasonable, risk-based steps to identify and limit any exposure they may have to funds and other assets associated with individuals and entities involved in laundering illicit proceeds, including those associated with sanctions evasion.

Reminder of AML and Regulatory Obligations for U.S. Financial Institutions Regarding Due Diligence, Correspondent Accounts, CISADA, and Suspicious Activity Reporting

FinCEN is providing the information in this advisory to assist U.S. financial institutions in meeting these risk-based due diligence obligations and to help identify individuals who are providing financial facilitation for or on behalf of sanctioned individuals and entities.

Enhanced Due Diligence Obligations for Private Banking Accounts

In addition to these general risk-based due diligence obligations, under section 312 of the USA PATRIOT Act (31 U.S.C. § 5318(i)) and its implementing regulations, U.S. financial institutions have regulatory obligations to implement a due diligence program for private banking accounts held for non-U.S. persons that is designed to detect and report any known or suspected money laundering or other suspicious activity.[41]

Customer Due Diligence and Identification of Beneficial Owners of New Legal Entity Accounts

As of May 11, 2018, FinCEN's CDD Rule requires banks; brokers or dealers in securities; mutual funds; and futures commission merchants and introducing brokers in commodities to identify and verify the identity of beneficial owners of legal entity customers, subject to certain exclusions and exemptions.[42] This could facilitate the identification of legal entities that may be owned or controlled by individuals and entities impacted by Iran-related sanctions.

41. *See* 31 CFR § 1010.620(a-b). The definition of "covered financial institution" is found in 31 CFR § 1010.605(e). The definition of "private banking account" is found in 31 CFR § 1010.605(m). The definition of "non-U.S. person" is found in 31 CFR § 1010.605(h).

42. *See* 31 CFR § 1010.230 (describing beneficial ownership requirements for legal entity customers).

General Obligations for Correspondent Account Due Diligence and Anti-Money Laundering Programs

U.S. financial institutions also are reminded to comply with their general due diligence obligations under 31 CFR § 1010.610(a), in addition to their general AML Program obligations under 31 U.S.C. § 5318(h) and its implementing regulations.[43] As required under 31 CFR § 1010.610(a), covered financial institutions should ensure that their due diligence programs, which address correspondent accounts maintained for foreign financial institutions, include appropriate, specific, risk-based, and, where necessary, enhanced policies, procedures, and controls that are reasonably designed to detect and report known or suspected money laundering activity conducted through or involving any correspondent account established, maintained, administered, or managed in the United States.

Comprehensive Iran Sanctions, Accountability, and Divestment Act of 2010

FinCEN also reminds U.S. banks of the reporting requirements associated with *Comprehensive Iran Sanctions, Accountability, and Divestment Act* (CISADA) under 31 CFR § 1060.300, upon receipt of a written request from FinCEN, to inquire of a specified foreign bank for which it maintains a correspondent account, for information with respect to the following: whether the foreign bank maintains a correspondent account for, or has processed transfers of funds on behalf of, an Iranian-linked financial institution designated under the International Emergency Economic Powers Act (IEEPA); and whether the foreign bank has processed transfers of funds for the IRGC or any of its agents or affiliates designated under IEEPA.[44]

Suspicious Activity Reporting

A financial institution may be required to file a SAR if it knows, suspects, or has reason to suspect a transaction conducted or attempted by, at, or through the financial institution involves funds derived from illegal activity, or attempts to disguise funds derived from illegal activity; is designed to evade regulations promulgated under the BSA; lacks a business or apparent lawful purpose; or involves the use of the financial institution to facilitate criminal activity, which may include sanctions evasion.[45]

43. *See* 31 CFR § 1010.210 (regarding anti-money laundering program requirements).

44. *See* 31 CFR § 1060.300(a).

45. *See generally* 31 CFR §§ 1020.320, 1021.320, 1022.320, 1023.320, 1024.320, 1025.320, 1026.320, 1029.320, and 1030.320

SAR Filing Instructions

When filing a SAR, financial institutions should provide all pertinent available information in the SAR form and narrative. **FinCEN further requests that financial institutions reference this advisory by including the key term:**

"Iran FIN-2018-A006"

to indicate a connection between the suspicious activity being reported and the persons and activities highlighted in this advisory.

For Further Information

Additional questions or comments regarding the contents of this advisory should be addressed to the FinCEN Resource Center at FRC@fincen.gov.

Financial institutions wanting to report suspicious transactions that may potentially relate to terrorist activity should call the Financial Institutions Toll-Free Hotline at (866) 556-3974 (7 days a week, 24 hours a day). The purpose of the hotline is to expedite the delivery of this information to law enforcement. Financial institutions should immediately report any imminent threat to local-area law enforcement officials.

Financial institutions or virtual currency providers having questions concerning OFAC sanctions should either call OFAC's Toll-Free Hotline at 1-800-540-6322, or email OFAC's Feedback Account at OFAC_Feedback@treasury.gov.

The mission of the Financial Crimes Enforcement Network is to safeguard the financial system from illicit use, combat money laundering, and promote national security through the strategic use of financial authorities and the collection, analysis, and dissemination of financial intelligence.