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## 外交部 函

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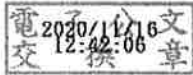
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密等及解密條件或保密期限：  
附件：如文 (10921537150-0-0.pdf)

主旨：關於美財政部公布伊朗相關制裁清單包含我國人事，檢送  
駐美國代表處本(109)年11月10日第3322號電影本共9頁如  
附件，請查照。

正本：財政部、法務部

副本：





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洩露、交付、毀棄、損壞、隱匿或遺失國家機密，依法！

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# 駐 美 國 代 表 處 電 報

專號：USA3322 第 1 頁

收電日期：

日期：109.11.10 方式：E F 本電：電文 2 頁，附件 7 頁，集 9 頁

擬辦	MOFA	批示	11A
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事由：陳報美財政部公布伊朗相關制裁清單包含我國人事  
外交部鈞鑒 (B、伊朗制裁案)：

- 一、美財政部本 (11) 月 10 日發布新聞稿略以，該部外國資產管制局 (OFAC) 以協助伊朗軍事業者 Iran Communication Industries (ICI, 分於 2008 年及 2010 年被美國及歐盟制裁) 採購包括美國原產之電子零組件在內之敏感貨品，違反美國對伊朗制裁禁令，將 6 家公司及 4 名個人列入「管制名單」(SDN List, 詳附件 1)，其中包括 1 家位於台灣之得實國際股份有限公司 (DES International Co., Ltd, 下簡稱得實公司) 以及 2 名台籍人士-- Shih Mei (Amber) Sun 及 Chin-Hua (Jinee) Huang。
- 二、前揭新聞稿指出，位於台灣之得實公司涉嫌協助位於香港之 Proma Industry Co., Ltd 公司採購電子組件，而 Proma 公司則協助伊朗 Hoda Trading 公司 (ICI 之子公司) 採購該等電子組件。得實公司主要負責人係伊朗及英國雙重國籍公民 Mohammad Soltanmohammadi, 渠中文名為王中朗 (Chung Lung Wang), 至 Shih Mei (Amber) Sun 及 Chin-Hua (Jinee) Huang 兩人則係受雇

裝

訂

線

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滲露、交付、毀棄、損壞、隱匿或遺失國家機密，依法追究。

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## 駐 美 國 代 表 處 電 報

專號：USA3322 第 2 頁

於得實公司，負責銷售美製電子組件，其中 Shih Mei (Amber) Sun 持有得實公司五分之一之股權，亦為該公司之財務長。除前述台灣公司及個人外，另包括 Hoda Trading 公司 (伊朗)、Proma Industry Co., Ltd 公司 (香港)、Mohammad Soltanmohammadi (伊朗及英國雙重國籍)、Naz Technology Co., Ltd 公司 (中國)、Soltech Industry Co., Ltd 公司 (汶萊)、Mohammad Banihashemi (伊朗籍) 及 Artin San'at Tabaan Company 公司 (伊朗) 亦同時被列入管制名單。

三、依據美國法令，前述名單所列實體與個人位於美國境內，或由美國個人或法人持有或控制之資產已遭凍結，亦禁止美國個人或法人與渠等進行交易；新聞稿亦提到，與前述實體或個人進行交易者，亦將面臨可能被制裁之風險。

四、檢送前述新聞稿如附件 2，併陳請鑒察。

駐美國代表處 (「經」機秘書文革) (副本請抄陳國家安全會議及抄送財政部、法務部；已分電經濟部、經濟部國際貿易局)

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MOFA 311A

## U.S. DEPARTMENT OF THE TREASURY

### Treasury Sanctions Procurement Network Supplying Iranian Military Firm

November 10, 2020

*International network procured electronic components for sanctioned Iranian military firm*

**WASHINGTON** – Today, the U.S. Department of the Treasury's Office of Foreign Assets Control (OFAC) designated a network of six companies and four individuals that facilitated the procurement of sensitive goods, including U.S.-origin electronic components, for Iran Communication Industries (ICI), an Iranian military firm designated by the United States in 2008 and by the European Union in 2010 for being owned or controlled by Iran's Ministry of Defense and Armed Forces Logistics (MODAFL), the overall manager and coordinator of Iran's ballistic missile program. ICI, a subsidiary of Iran Electronics Industries, which falls under MODAFL, produces various items including military communication systems, avionics, information technology, electronic warfare, and missile launchers.

"The Iranian regime utilizes a global network of companies to advance its destabilizing military capabilities," said Secretary Steven T. Mnuchin. "The United States will continue to take action against those who help to support the regime's militarization and proliferation efforts."

Treasury's action is being taken pursuant to Executive Order (E.O.) 13382, an authority aimed at freezing the assets of proliferators of weapons of mass destruction (WMD) and their supporters. Concurrent with Treasury's designations, the U.S. Attorney's Office for the District of Columbia is filing charges by criminal complaint against two entities and one individual that have also been designated today.

#### **SANCTIONS AGAINST IRAN'S ILLICIT PROCUREMENT OF ELECTRONIC COMPONENTS**

Iran-based **Hoda Trading**, a subsidiary of ICI since 2017, has sought U.S.-origin electronic components from China on behalf of ICI since October 2008. Since January 2017, Hoda Trading has been involved in the procurement of electronic components from China on behalf of ICI, including shipments from China of high frequency Near Vertical Incidence Skywave antennas — products that have an application in military communications — for end use by the ICI. Since June 2016, Hong Kong-based **Proma Industry Co., Ltd.** helped facilitate shipments to Hoda Trading. Proma Industry also helped facilitate the sale and shipment of tens of thousands of U.S. dollars' worth of goods purchased by Hoda Trading.

Hoda Trading purchased electronic components through businesses in Iran and the United Arab Emirates. One of these businesses is **DES International Co., Ltd.**, a company that claims to have offices in the UAE, Singapore, Taiwan, and China. DES International is majority-owned and managed by dual Iran-U.K. national **Mohammad Soltanmohammadi**, utilizing the alias Chung Lung Wang.

Soltanmohammadi is also the owner of China-based company **Naz Technology Co., Ltd.** and serves as a Director of Brunei-based **Soltech Industry Co., Ltd.** As of July 2016, Hoda Trading had paid tens of

thousands of U.S. dollars to Soltech Industry for the purchase of electronic components, and Soltech Industry offered to deliver goods to Hoda Trading through a forwarder.

**Shih Mei (Amber) Sun**, an employee of DES International since 2013, owns over a fifth of the company's shares and serves as DES International's finance director. **Chin-Hua (Jinee) Huang**, an employee of DES International since 2009, works in sales for the company and facilitated transactions for U.S. origin electronic components involving DES International from October 2013 through at least February 2014. Iran-based **Mohammad Banihashemi** has worked with Soltanmohammadi and Sun at DES International to direct sales opportunities to DES International, and has requested payment for his services, which included, among others, the release of shipments of goods from international customs.

**Artin San'at Tabaan Company**, an Iran-based maker of computer components under the brand Solmate, has provided DES International with use of Solmate as the company's in-house brand and provided Solmate products for sale at DES International locations.

#### **BASES FOR DESIGNATION**

Hoda Trading is being designated for acting or purporting to act for or on behalf of, directly or indirectly, Iran Communication Industries.

Proma Industry Co., Ltd. and Soltech Industry Co., Ltd. are being designated for having provided, or having attempted to provide, financial, material, technological, or other support for, or goods or services in support of, Hoda Trading.

Mohammad Soltanmohammadi is being designated for acting or purporting to act for or on behalf of, directly or indirectly, Soltech Industry Co., Ltd.

DES International and Naz Technology Co., Ltd. are being designated for being owned or controlled by Mohammad Soltanmohammadi.

Shih Mei Sun, Chin-Hua Huang, and Artin San'at Tabaan Company are being designated for having provided, or having attempted to provide, financial, material, technological, or other support for, or goods or services in support of, DES International Co., Ltd.

Mohammad Banihashemi is being designated for acting or purporting to act for or on behalf of, directly or indirectly, DES International Co., Ltd.

#### **SANCTIONS IMPLICATIONS**

As a result of today's action, all property and interests in property of these targets that are in the United States or in the possession or control of U.S. persons must be blocked and reported to OFAC. OFAC's regulations generally prohibit all dealings by U.S. persons or within the United States (including transactions transiting the United States) that involve any property or interests in property of blocked or designated persons.

In addition, persons that engage in certain transactions with the individuals and entities designated today may themselves be exposed to sanctions or subject to an enforcement action. Furthermore, unless an exception applies, any foreign financial institution that knowingly facilitates a significant transaction for any of the individuals or entities designated today could be subject to U.S. sanctions.

View identifying information on the individuals and entities designated today.

MOFA 311A 60081009

U.S. DEPARTMENT OF THE TREASURY

RECENT ACTIONS

Enforcement Actions

General Licenses

Misc./Other

Regulations and Guidance

Sanctions List Updates

Non-Proliferation Designations; Iran-related Designations

11/10/2020

**SPECIALLY DESIGNATED NATIONALS LIST UPDATE**

**The following individuals have been added to OFAC's SDN List:**

BANIHASHEMI, Mohammad (a.k.a. BANIHASHEMI CHAHAROM, Seyed Mohammad), No 3, Mehr Alley, Kamran Alley, Bastan Alley, Firuzbakhsh Ave, Aghdasieh, Tehran 1957759678, Iran; DOB 26 Mar 1959; POB Mashhad, Iran; nationality Iran; Additional Sanctions Information - Subject to Secondary Sanctions; Gender Male; Passport B32563329 (Iran) expires 17 Dec 2019; National ID No. 0940486229 (Iran) (individual) [NPWMD] [IFSR] (Linked To: DES INTERNATIONAL CO., LTD.).

HUANG, Chin-Hua (a.k.a. HUANG, Jinee), Taiwan; DOB 08 Apr 1978; POB Taiwan; citizen Taiwan; Additional Sanctions Information - Subject to Secondary Sanctions; Gender Female; Passport 302114600 (Taiwan) expires 07 Oct 2020; Identification Number H222234242 (Taiwan) (individual) [NPWMD] [IFSR] (Linked To: DES INTERNATIONAL CO., LTD.).

SOLTANMOHAMMADI, Mohammad (a.k.a. SELTAN MOHAMMEDI, Mohammed; a.k.a. SULTAN MOHMADI, Mohamad; a.k.a. WANG, Chung Lang; a.k.a. WANG, Chung Lung; a.k.a. WANG, Zhong-Lang), Apartment # 1504, Fairouz Tower, Dubai Marina, Dubai, United Arab Emirates; 216 Ocean Drive, Sentosa Cove, Singapore 098622, Singapore; DOB 04 Nov 1960; POB Hamedan, Iran; nationality Iran; alt. nationality United Kingdom; Additional Sanctions Information - Subject to Secondary Sanctions; Gender Male; Passport 518015439 (United Kingdom) expires 07 Apr 2026; alt. Passport T96397867 (Iran); alt. Passport 038016890 (United Kingdom); alt. Passport 093045489 (United Kingdom); alt. Passport 093104973



(United Kingdom); alt. Passport 093234017 (United Kingdom); alt. Passport 099156908 (United Kingdom); alt. Passport U11283369 (Iran); alt. Passport S2760238Z; National ID No. S27602 (United Kingdom) (individual) [NPWMD] [IFSR] (Linked To: SOLTECH INDUSTRY CO., LTD.).

SUN, Shih Mei (a.k.a. SUN, Amber; a.k.a. SUN, Shi Mei; a.k.a. SUN, Shih-Mei; a.k.a. SUN, Shi Mei), No. 12, Lane 85, Zhengyi Rd., Zhongli, Taoyuan, 325, Taiwan; DOB 23 Mar 1969; POB Taitung, Taiwan; nationality Taiwan; Additional Sanctions Information - Subject to Secondary Sanctions; Gender Female; Passport 211104130 (Taiwan); National ID No. V220335470 (Taiwan) (Individual) [NPWMD] [IFSR] (Linked To: DES INTERNATIONAL CO., LTD.).

**The following entities have been added to OFAC's SDN List:**

ARTIN SANA'AT TABAAN COMPANY (a.k.a. ARTIN SANAT TABAN; a.k.a. ARTIN SANAT TABAN CO; a.k.a. "SOLMATE"); 3rd Floor, No 158, Keshavarz Str., Tehran, Iran; 1 North Bridge Road, #25-05, High Street Center, 179094, Singapore; #14, Bashardust Ave, Roudbare-Shanghri, Madar Sq., Shariati St., Mirdamad, Tehran, Iran; 404, 4th Floor, Atrium Centre, Bur-Dubai, Dubai, United Arab Emirates; P.O. Box 112724, Dubai, United Arab Emirates; Shariati Street, after Mirdamad Blvd, Lushah Street, Rabie Street, Bashardost Alley, Plaque 14, Tehran, Iran; TWTC Em, 6C-21(6F), No. 5, Hsin Yi Rd, Taipei, Taiwan; Website <http://solmatepciran.com>; alt. Website <http://www.solmateco.com>; Additional Sanctions Information - Subject to Secondary Sanctions; Registration Number 368623 (Iran) [NPWMD] [IFSR] (Linked To: DES INTERNATIONAL CO., LTD.).

DES INTERNATIONAL CO., LTD. (a.k.a. D.E.S. INTERNATIONAL; a.k.a. D.E.S. INTERNATIONAL CO. LTD.; a.k.a. DES INTERNATIONAL; a.k.a. DES INTERNATIONAL CO.; a.k.a. DES INTERNATIONAL COMPANY; a.k.a. DES INTERNATIONAL COMPANY LIMITED), Taiwan World Trade Centre, Rm 6c-21 (6F), No. 5, Sec. 5, Xinyi Road, Taipei 11011, Taiwan; 1 North Bridge Road, #24-05 High Street Centre, Singapore 179094, Singapore; Suite 911, 9TH/F, Chuangjian Building, No.6023 Shennan Main Road, Futian District, Shenzhen, Guangdong, China; Unit 201, 2F Lung Fung Centre, No.23 Yip Cheong Street, Fanling, N. T., Hong Kong, China; Sultan Belshalat Building, Shop #4, Ground Floor, B/H Admiral Plaza Hotel, Bur Dubai, Dubai, United Arab Emirates; P.O. Box 112724, United Arab Emirates; Sec. 5, Xinyi Rd., Xinyi District No. 5, Taipei City 110, Taiwan; 9FL-3, No.375, Sec. 4, Sin Yi. Rd., Sin Yi Dist., Taipei 110, Taiwan; Website [www.des.com.tw](http://www.des.com.tw); alt. Website [www.dscmmc.com](http://www.dscmmc.com); Additional Sanctions Information - Subject to Secondary Sanctions; Business Number 89402436 (Taiwan); Registration Number 69402436 (Taiwan) [NPWMD] [IFSR] (Linked To: SOLTANMOHAMMADI, Mohammad).

HODA TRADING (a.k.a. HODA TRADING CO.; a.k.a. HODA TRADING COMPANY; a.k.a. SUSTAINABLE ELECTRONIC DEVELOPMENT; a.k.a. SUSTAINABLE ELECTRONICS DEVELOPMENT; a.k.a. SUSTAINABLE ELECTRONICS DEVELOPMENT COMPANY), No. 34, Shahid Hesari (Southern Razan) St., Mirdamad Avenue, Tehran, Iran; Langari Street, Nobonyad Square, Pasdaran Avenue, Tehran, Iran; No. 225 Teymori St., Langari Nobonyad Ave., Tehran, Iran; No.31, Across Nikan Hospital, Araj, Artesh Highway, Tehran,

Iran; Website www.sedfirm.com; Additional Sanctions Information - Subject to Secondary Sanctions [NPWMD] [IFSR] (Linked To: IRAN COMMUNICATION INDUSTRIES).

NAZ TECHNOLOGY CO., LTD. (a.k.a. N.A.Z. TECHNOLOGY; a.k.a. NAZ TECHNOLOGY; a.k.a. NAZ TECHNOLOGY CO.; a.k.a. NAZ TECHNOLOGY CORPORATION LTD; a.k.a. "NAZ"), Taiwan World Trade Center (TWTC) Room 6C-21(6F) Number 5 Section 5, Xinyi Road, Xinyi District, Taipei City, Taiwan; 605, Floor 6, Building 204, Tairan Technology Park, Tairan 6th Road, Tianan Community, Sha Tou Sub-District, Futian District, Shenzhen, Guangdong, China; Building 10, Shiguan Industrial Park, Shenzhen 518106, China; C-608, Floor 6, Lan Optical Technology Building, No.7, Xixi Road, Hi-and-New Tech Part (North Zone), Nanshan District, Shenzhen, China; Rm 804, Sino Centre, 582-592 Nathan Rd., KLN, Hong Kong, China; Additional Sanctions Information - Subject to Secondary Sanctions; Registration Number 440301503328703 (China) [NPWMD] [IFSR] (Linked To: SOLTANMOHAMMADI, Mohammad).

PROMA INDUSTRY CO., LTD. (a.k.a. PROMA INDUSTRY CO.; a.k.a. PROMA-INDUSTRY CO., LTD; a.k.a. PROMA INDUSTRY COMPANY; a.k.a. PROMA INDUSTRY COMPANY LIMITED; a.k.a. PROMA INDUSTRY COMPANY, LTD.; a.k.a. "PROMA"; a.k.a. "PROMA INDUSTRY"), 1A, Fook Ying Building, 379 King's Road, North Point, Hong Kong, China; 3A, Fook Ying Building, 420 King's Road, Hong Kong, China; Additional Sanctions Information - Subject to Secondary Sanctions; C.R. No. 4116 (Hong Kong) [NPWMD] [IFSR] (Linked To: HODA TRADING).

SOLTECH INDUSTRY CO., LTD. (a.k.a. SOLTECH INDUSTRIES COMPANY LTD.; a.k.a. SOLTECH INDUSTRY COMPANY, LTD; a.k.a. "SOLTECH"; a.k.a. "SOLTECH INDUSTRIES"; a.k.a. "SOLTECH INDUSTRY CO."; a.k.a. "SOLTECH INDUSTRY COMPANY"), 1A, Fook Ying Building, 379 Kings Road, North Point, Hong Kong, China; Rm 51, 5th Floor, Britannia House, Jalan Gator, Bandar Seri Begawan BS 8811, Brunei; Additional Sanctions Information - Subject to Secondary Sanctions; Company Number NBD/4116 (Brunei) [NPWMD] [IFSR] (Linked To: HODA TRADING).

### Press Release Link

Treasury Sanctions Procurement Network Supplying Iranian Military Firm

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