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Clerk, U.S. District & Bankruptcy
Courts for the District of Columbia

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

UNITED STATES OF AMERICA,

Plaintiff,

v.

OIL TANKER – “GRACE 1” (IMO 9116412),

ALL PETROLEUM ABOARD OIL
TANKER – “GRACE 1” (IMO 9116412),

- and -

\$999,950.00 AT U.S. BANK 1
ASSOCIATED WITH PARADISE GLOBAL
TRADING LLC

Defendants.

Civil Action No. 1:19-cv-1989-(JEB)

AMENDED UNITED STATES’ VERIFIED COMPLAINT
FOR FORFEITURE *IN REM*

COMES NOW, Plaintiff the United States of America (the “United States”), by and through the United States Attorney for the District of Columbia, which brings this amended verified complaint for forfeiture in a civil action *in rem* against the defendant properties, namely: Oil Tanker *Grace 1*, bearing International Maritime Organization (IMO) Number 9116412 (a/k/a “*Adrian Darya*”) (“*Grace 1*”), All Petroleum Aboard Oil Tanker *Grace 1* (collectively the “Defendant Properties”), and \$999,950.00 at U.S. Bank 1 Associated with Paradise Global Trading LLC (“Defendant Funds”); and alleges as follows.

NATURE OF ACTION AND THE DEFENDANT *IN REM*

1. This *in rem* forfeiture action arises out of an investigation by the Federal Bureau of Investigation (“FBI”) and Homeland Security Investigations (“HSI”). Specifically, the United

States is investigating: (i) the unlawful use of the U.S. financial system to support and finance Iran's transport and sale of oil products to destinations including Syria, (ii) assets related to the IRGC; and (iii) entities that are providing material support to the IRGC.

2. The Defendant Properties are subject to seizure and forfeiture pursuant to 18 U.S.C. § 981(a)(1)(C), as property constituting or derived from proceeds traceable to violations of the International Emergency Economic Powers Act ("IEEPA"), codified at 50 U.S.C. § 1701 *et seq*, and the bank fraud statute, codified at 18 U.S.C. § 1344. The Defendant Properties are also subject to seizure and forfeiture pursuant to 18 U.S.C. § 981(a)(1)(A), as property involved in money laundering transactions, in violation of 18 U.S.C. § 1956, and as property traceable to such property. The Defendant Properties are further subject to seizure and forfeiture pursuant to 18 U.S.C. § 981(a)(1)(G)(1), as foreign assets or sources of influence of the Islamic Revolutionary Guard Corps (IRGC), a designated foreign terrorist organization, which has engaged in planning and perpetrating federal crimes of terrorism as defined in 18 U.S.C. § 2332b(g)(5).

3. A photograph of the *Grace I* is attached hereto as Exhibit A.

JURISDICTION AND VENUE

4. This Court has jurisdiction over this action pursuant to 28 U.S.C. §§ 1345 and 1355.

5. Venue is proper pursuant to 28 U.S.C. § 1355(b)(1)(A) because acts and omissions giving rise to the forfeiture took place in the District of Columbia. The coconspirators (identified below) failed to seek the requisite licenses from the Office of Foreign Assets Control ("OFAC"), which is located in Washington, D.C.

6. Venue is also proper within this judicial district pursuant to 28 U.S.C. § 1355(b)(2), because the property subject to forfeiture is located in a foreign country.

FACTS GIVING RISE TO FORFEITURE

I. BACKGROUND

A. IEEPA and the Iranian Transactions and Sanctions Regulations

7. This civil forfeiture action relates to violations of regulations and Executive Orders issued pursuant to IEEPA. Enacted in 1977, IEEPA gives the President certain powers, defined in 50 U.S.C. § 1702, to deal with any threats with respect to which the President has declared a national emergency, and prescribes criminal penalties for violations. Section 1705 provides, in part, that “[i]t shall be unlawful for a person to violate, attempt to violate, conspire to violate, or cause a violation of any license, order, regulation, or prohibition issued under this title.” 50 U.S.C. § 1705(a).

8. Beginning with Executive Order No. 12170, issued on November 14, 1979, the President found that “the situation in Iran constitutes an unusual and extraordinary threat to the national security, foreign policy and economy of the United States and declare[d] a national emergency to deal with that threat.”

9. On March 15 and May 6, 1995, the President issued Executive Orders Nos. 12957 and 12959, prohibiting, among other things, the exportation, re-exportation, sale, or supply, directly or indirectly, to Iran of any goods, technology, or services from the United States or by a United States person, and on August 19, 1997, issued Executive Order No. 13059 clarifying the previous orders (collectively, the “Executive Orders”). The Executive Orders authorized the United States Secretary of the Treasury to promulgate rules and regulations necessary to carry out the Executive Orders. Pursuant to this authority, the Secretary of the Treasury promulgated the Iranian Transactions Regulations (renamed in 2013, the Iranian Transactions and Sanctions Regulations, the “ITSR”) implementing the sanctions imposed by the Executive Orders.

10. The ITSR, Title 31, Code of Federal Regulations, Section 560.204, prohibit, among other things, the exportation, re-exportation, sale, or supply, directly or indirectly, from the United States, or by a United States Person, of goods, technology, or services to Iran or the Government of Iran (with certain limited exceptions), including the exportation, re-exportation, sale or supply of goods, technology or services to a third country knowing that such goods, technology or services are intended for Iran or the Government of Iran, without a license from OFAC.

11. The ITSR also prohibits the supply of services where the benefit of such services is otherwise received in Iran, if such services are performed in the United States. *See* 31 C.F.R. § 560.410.

12. The ITSR provides that the transfer of funds, directly or indirectly, from the United States or by a U.S. person to Iran or the Government of Iran is a prohibited export, re-export, sale, or supply of services to Iran or the Government of Iran. *See* 31 C.F.R. § 560.427(a).

13. The ITSR further prohibits transactions that evade or avoid, have the purpose of evading or avoiding, cause a violation of, or attempt to violate the ITSR. 31 C.F.R. § 560.203.

14. Additionally, on August 6, 2018, the President, pursuant to IEEPA, issued Executive Order 13846, which, among other things, authorized the Secretary of State, in consultation with the secretaries of various other executive agencies, to impose sanctions on individuals who knowingly engage in a significant transaction for the purchase, acquisition, sale, transport, or marketing of oil or petroleum products from Iran.

15. After this Executive Order was implemented, the Iranian Oil Minister, Bijan Namdar Zanganeh, said in an interview, “We have unofficial or unconventional sales, all of which are secret, because if they are made known America would immediately stop them.”

16. Law enforcement has uncovered evidence showing that oil tanker *Grace I* has been involved with the type of the secret, unconventional sales, which the Iranian Oil Minister referenced. Law enforcement has also discovered that, in addition to transferring Iranian petroleum, the *Grace I* used fraudulent documents when conducting this activity. Moreover, financial records show that U.S. dollar wires were sent through the United States financial system for the benefit of the *Grace I* near the time of illicit transfers by the *Grace I*. This scheme was designed to benefit the IRGC, as it ultimately controls the *Grace I*.

B. Overview of the *Grace I*

17. This civil forfeiture action arises from a scheme to unlawfully access the U.S. financial system to support illicit shipments to and from Iran by the IRGC. The scheme involves multiple parties affiliated with the IRGC and furthered by the deceptive voyages of the *Grace I* from Iran to other locations, including Syria.

18. The *Grace I*, which was previously flagged in Panama, is a large oil tanker capable of carrying 2,127,146 barrels (approximately 290,000 metric tons) of crude oil.

19. U.S. authorities have determined that the *Grace I* has a complex ownership structure. It is owned, managed, and crewed by separate companies that appear to be operating on behalf of other parties. As noted above, the Defendant Properties are ultimately controlled by the IRGC.

20. On October 25, 2007, the Department of State and Treasury Department designated the IRGC pursuant to E.O. 13382 in connection with its support to Iran's ballistic missile and nuclear programs. The Treasury designation stated:

Considered the military vanguard of Iran, the Islamic Revolutionary Guard Corps (IRGC; aka Iranian Revolutionary Guard Corps) is composed of five branches (Ground Forces, Air Force, Navy, Basij militia, and Qods Force special operations) in addition to a counterintelligence directorate and

representatives of the Supreme Leader. It runs prisons, and has numerous economic interests involving defense production, construction, and the oil industry. Several of the IRGC's leaders have been sanctioned under UN Security Council Resolution 1747.

The IRGC has been outspoken about its willingness to proliferate ballistic missiles capable of carrying WMD. The IRGC's ballistic missile inventory includes missiles, which could be modified to deliver WMD. The IRGC is one of the primary regime organizations tied to developing and testing the Shahab-3. The IRGC attempted, as recently as 2006, to procure sophisticated and costly equipment that could be used to support Iran's ballistic missile and nuclear programs.

21. On April 8, 2019, the President designated the IRGC as a Foreign Terrorist Organization. The designation noted that the IRGC actively participates in, finances, and promotes terrorism.

22. According to the Department of Treasury, the IRGC and its major holdings have a dominant presence in Iran's commercial and financial sectors, controlling multi-billion dollar businesses and maintaining extensive economic interests in the oil industry, and the profits from these activities support the IRGC's full range of nefarious activities, including the proliferation of weapons of mass destruction (WMD) and their means of delivery, support for terrorism, and a variety of human rights abuses, at home and abroad.

23. A company registered in Singapore, (Company 1) is the manager of the *Grace 1*. Company 1 is a front company that conceals illegal oil sales for Iranian entities.

24. Subpoena returns from U.S. financial institutions revealed that in 2016, Company 1 made at least six U.S. dollar payments totaling \$34,108.79 to a U.S. company (U.S. Entity 1). Records related to these payments referenced the *Grace 1*. U.S. Entity 1 purports to provide petroleum tanker products and related logistics solutions. These U.S. dollar transactions, which routed through the United States, would have required a license from OFAC; however, no such licenses were sought or received.

25. Company 1 is part of a network of companies controlled by a company registered in the United Arab Emirates (Company Group 1). Company Group 1 has received payments from Mohammad Saeed Al Aqili and the Al Aqili Group. OFAC sanctioned Mohammad Saeed Al Aqili and the Al Aqili Group for assisting the Iranian regime in selling oil in evasion of U.S. trade/economic sanctions. OFAC noted in the designation that the Al Aqili Group arranged oil sales for the IRGC and facilitated the circumvention of oil sanctions by disguising the oil's origin.

26. Company Group 1 made payments related to the *Grace 1*. A U.S. company that provides insurance to maritime vessels (U.S. Entity 2) revealed that multiple companies in Company Group 1 have laundered wire payments via front companies to purchase insurance from U.S. Entity 2, including for the *Grace 1*.

27. In addition to Company 1's connection to the Aqili Group, Company 1 is also directly affiliated with the National Iranian Oil Company (NIOC).

28. On September 24, 2012, OFAC stated the following regarding NIOC:

Under the current Iranian regime, the IRGC's influence has grown within NIOC. For example, on August 3, 2011, Iran's parliament approved the appointment of **Rostam Qasemi, a Brigadier General in the IRGC**, as Minister of Petroleum. Prior to his appointment, Qasemi was the commander of Khatam Al-Anbia, a construction and development wing of the IRGC that generates income and funds operations for the IRGC. Even in his new role as Minister of Petroleum, Qasemi has publicly stated his allegiance to the IRGC. As the IRGC has become increasingly influential in Iran's energy sector, Khatam Al-Anbia has obtained billions of dollars worth of contracts with Iranian energy companies, including NIOC, often without participating in a competitive bidding process.

(emphasis added).

29. At least one employee of Company 1 is also an agent of NIOC. This employee / NIOC agent of Company 1 communicated with U.S. Entity 1.

30. As described by OFAC, Rostam Qasemi was involved with both NIOC and the IRGC. On February 10, 2010, OFAC designated Rostam Qasemi as an IRGC General who used companies to generate funds for the IRGC.

31. An employee of Company 1 possessed a document related to the provision of oilfield services products to “the South Pars Oil Layer Project,” which is an oil project in Iran. Rostam Qasemi was sent this document. An Iranian-based news article corroborates that Rostam Qasemi was involved with the South Pars Oil Layer.

32. After the *Grace I* was seized, the IRGC Deputy Commander Rear Admiral Ali Fadavi, publically confirmed “we [IRGC] had rented the ship and we [IRGC] carried the cargo.”

C. Recent Voyage of the Defendant Properties

33. Given its size and capacity, the *Grace I* is required to use the Automatic Identification System (AIS), which was developed in the 1990s as a maritime safety feature that exchanges vessel information electronically among ships that are near each other.

34. Publically available AIS data revealed that, between 2018 and 2019, the *Grace I* appeared to deactivate its AIS to conceal its location. Specifically, from on or about November 1 through November 20, 2018, AIS data revealed that the *Grace I* loitered at the western end of the Persian Gulf near the Iran/Iraq border. The *Grace I* deactivated its AIS as it travelled towards the Iranian port of Asaluyeh, a location where oil tankers are known to load and unload petroleum. The *Grace I*’s AIS remained off until December 15, 2018. When the AIS resumed functioning, the depth of the *Grace I* was consistent with oil having been loaded while the AIS was turned off.

35. AIS data and witness interviews show that around January 16, 2019, the *Grace I* was co-located with an oil tanker named the Kriti Island in the Gulf of Oman, where it conducted a ship-to-ship transfer to the Kriti Island.

36. AIS data and witness interviews show that around January 22, 2019, the *Grace I* was co-located with an oil tanker named the Marshal Z, a tanker named by OFAC in a March 2019 public advisory as having engaged in ship-to-ship transfers of petroleum destined for Syria, in the Gulf of Oman, where it conducted a ship-to-ship transfer to the Marshal Z. Shortly thereafter, the Marshal Z engaged in another ship-to-ship transfer.

37. AIS data shows that the *Grace I*'s transponder turned off again from on or about April 8 to April 16, 2019, as it traveled in the Persian Gulf toward Iran. Information obtained during the investigation revealed that, during this period, the *Grace I* received Iranian oil from Kharg Island, Iran. The *Grace I*'s transponder became operational again on or about April 17, 2019, as it departed Kharg Island with Iranian oil.

38. The Defendant Properties then traveled around Africa.

39. On or about July 4, 2019, the British Royal Marines and authorities in Gibraltar detained the Defendant Properties for suspected violations of European Union sanctions on Syria.

40. According to publically available news reporting, on or about July 11, 2019, the Royal Gibraltar Police arrested the captain and chief officer of the *Grace I* for such sanctions violations.

D. Illicit Payments through U.S. Financial System Related to the *Grace I*'s Recent Voyage

i. Fraudulent Documents

41. Individuals associated with the *Grace I* provided those parties who participated in the above-described ship-to-ship transfers with the *Grace I* with fraudulent shipping documents stating that the *Grace I* had obtained oil and departed from the Iraqi shipping port, Basra Oil Terminal. These shipping documents were forged as a means to conceal the fact that the *Grace I*

had actually obtained oil and departed from Iran. Relevant authorities in Iraq have confirmed that the documents were fraudulent.

42. These fraudulent documents were created not only to deceive the parties involved in the above-described ship-to-ship transfers but also may have been created to deceive any financial institutions involved in the related financial transactions. Financial institutions often request supporting documentation relating to financial transactions, particularly when they involve high-risk industries such as the transshipment of petroleum, as part of their anti-money laundering due diligence efforts. The preparation of such documents is still consistent with known money laundering and bank fraud schemes.

43. The Financial Action Task Force has urged all jurisdictions to apply enhanced due diligence measures to protect against the terrorist financing risk emanating from Iran and the threat this poses to the international financial system, which in turn has caused banks to further scrutinize transactions with possible Iranian entities.

44. The Treasury Department has consistently underscored the risks of conducting business with entities associated with Iran. It has warned that Iran continues to use deceptive tactics including the use of front and shell companies to exploit markets in numerous countries to fund its nefarious activities. These tactics include forging documents, obfuscating data, and hiding illicit activities under official cover of government entities, among many others. On October 11, 2018, the Treasury Department issued a comprehensive advisory outlining the deceptive practices the Iranian regime employs to access the financial system with the intention of furthering its illicit activities.

ii. Transfers Using Multiple Intermediaries

45. Multiple companies engaged in multiple financial transactions related to the *Grace I*'s recent illegal shipment of Iranian oil through the U.S. financial system. Specifically, the companies involved with these transactions were used as intermediaries to avoid listing the ultimate senders and beneficiaries on these U.S. dollar transactions; in some instances, the parties described herein used multiple payment intermediaries when dealing with the same counterparties.

46. On or about December 20, 2018, a company registered in Saint Kitts and Nevis, (Company 2) laundered \$4 million to another company registered in Saint Kitts and Nevis (Company 3). This payment, which referenced the *Grace I* and an offshore oil rig, routed through a correspondent bank account in the United States because the payment was in U.S. dollars. Information obtained during the investigation revealed that Company 3 is located at the same address in Saint Kitts and Nevis as an oil procurement company, Blue Energy Trade Ltd, which is sanctioned by OFAC for shipping petroleum to Syria.

47. On or about December 26, 2018, a company registered in the United Arab Emirates (Company 4), wired \$1.3 million to Company 2. This payment, which referenced the *Grace I* and an offshore oil rig, routed through a correspondent bank account in the United States because the payment was in U.S. dollars.

48. On or about January 14 and 17, 2019, around the time the *Grace I* conducted the ship-to-ship transfers with the Kriti Island, a company registered in Singapore (Company 5) which chartered the *Grace I*, laundered approximately \$7,145,286.32 via multiple payments to a company registered in Saint Kitts and Nevis (Company 6), which has common ownership with Company 3. One of these payments listed "Trade" on the wiring instructions. This payment routed

through a correspondent bank account in the United States because the payment was in U.S. dollars.

49. On or about January 29, 2019, Company 5 wired \$495,021 to a company in Switzerland for the Kriti Island to transfer oil from the *Grace I*. Documents associated with this payment indicated that the purpose of this payment was “Trade,” which was the same instruction that Company 5 used when sending Company 6 funds on or about January 14, 2019. This payment routed through a correspondent bank account in the United States because the payment was in U.S. dollars.

iii. Syrian Sanction Violation

50. Prior to the *Grace I*’s detention in Gibraltar, a confidential source revealed that the *Grace I* was scheduled to arrive in Syria in early July.

51. Charts and electronic equipment recovered from onboard the *Grace I*, WhatsApp messages recovered from crewmembers’ mobile devices, and crewmembers’ statements revealed that the *Grace I* was destined for Port Banias, Syria in violation of U.S. sanctions.

52. The *Grace I*’s navigation charts, and Passage Plan plotted 38 specific “waypoints” for the route from the Persian Gulf (the “Gulf”) to Syria with final destination coordinates for a position off the coast of Banias, Syria. The Vessel’s Passage Plan also outlined a return voyage, showing a plotted course from a position off the coast of Banias, Syria to the Gulf.

53. The Vessel’s electronic voyage summary, Cargo Loading Plan, Daily (Noon) Navigation Reports, and “Underkeel Clearance Calculation” all stated that its destination was Syria.

E. Laundering of Defendant Funds

54. On February 3, 2015, an Oman-based front company (Oman Company 1) wired \$699,975.00 to Paradise Global, which funds were blocked while transiting through a U.S. correspondent bank account (U.S. Bank 1).

55. On February 4, 2015, Oman Company 1 wired Paradise Global another \$299,975.00, which was also blocked while transiting through U.S. Bank 1. These blocked wires constitute the Defendant Funds, for which the subjects failed to seek or obtain OFAC licenses. As further described below, Paradise Global is a shell company operated by Company Group 1 and affiliated companies.

56. A commercial company database shows that Paradise Global is partially owned by a member of the Al Aqili Group, who is a shareholder and/or chairman of multiple Company Group 1 companies. That Al Aqili Group member and Mohammad Saeed Al Aqili, who is designated by OFAC, both serve as directors of another Al Aqili Group company.

57. There are numerous instances of Paradise Global coordinating payments with other Company Group 1 companies, for example:

a. On June 17, 2014, the procurement manager of Company 1 and the owner of Company Group 1, were forwarded the previously described email which included designated IRGC General Rostam Qasemi, to provide services at an Iranian oil field.

b. On July 8, 2014, the managing director of Paradise Global was carbon copied on an email between the NIOC agent at Company 1 and another employee of Company 1, which included a quote to pay in U.S. dollars.

c. On August 31, 2014, an employee of Company 1 asked Paradise Global to pay Company 1's expenses and carbon copied employees of another Company Group 1 affiliated company.

d. On August 31, 2014, Paradise Global, the NIOC agent at Company 1, and other Company Group 1 affiliated employees discussed the crew of the Grace 1 and a related petroleum tanker (Vessel 1).

e. On September 1, 2014, Company 1 discussed incurring expenses with the managing director of Paradise Global and the managing director approved the expenses on September 2, 2014.

f. On September 2, 2014, the NIOC agent at Company 1 coordinated with the owner of Company Group 1, employees of Company 1, and Paradise Global employees to determine which individuals were using which email addresses on Company 1's domain, reflecting the close relationship between Company 1, Company Group, and Paradise Global.

g. On September 9, 2014, the managing director of Paradise Global coordinated with a NIOC agent at Company 1 and the manager of Company Group 1 about staffing an Iranian onboard Vessel 1.

h. On November 28, 2014, Paradise Global paid U.S. Entity 2 for insurance premiums associated with Company 1 operated Vessel 1.

i. On January 28, 2015, the procurement manager for Company 1 renewed the Paradise Global domain, using the email account associated with the Paradise Global managing director.

j. On July 26, 2015, an accounting manager for Company Group 1 and Company 1 sent a check from Paradise Global to Company 1 for Grace 1 expenses.

58. In summary, Paradise Global was used as a payment intermediary for Company 1 and other Al Aqili / Company Group 1 companies, including the petroleum tankers operated by Company 1, such as the Grace 1. Moreover, as noted above, Company Group laundered payments with the Al Aqili Group.

COUNT ONE – FORFEITURE
(18 U.S.C. § 981(A)(1)(C))

59. The United States incorporates by reference the allegations set forth in Paragraphs 1 to 58 above as if fully set forth herein.

60. Persons known and unknown acted individually and conspired together to cause and conduct the above identified illegal payments and financial services, which benefitted Iran, in violation of IEEPA, specifically 50 U.S.C. § 1705 *et seq.* and the conspiracy statute, 18 U.S.C. § 371.

61. As such, the Defendant Properties and Defendant Funds are subject to forfeiture, pursuant to 18 U.S.C. § 981(a)(1)(C), as property which constitutes or is derived from proceeds traceable to substantive and conspiracy violations of section 206 (relating to penalties) of the IEEPA.

COUNT TWO – FORFEITURE
(18 U.S.C. § 981(A)(1)(C))

62. The United States incorporates by reference the allegations set forth in Paragraphs 1 to 58 above as if fully set forth herein.

63. Persons known and unknown acted individually and conspired together to conduct the above identified illegal payments using shell companies and other tactics to conceal beneficial

owners and ties to Iran as part of a scheme or artifice to defraud a U.S. bank and/or to obtain any of the money, funds, or other property owned by, or under the custody or control of, a U.S. bank by means of false or fraudulent pretenses, representations, or promises, in violation of the bank fraud statute, specifically 18 U.S.C. § 1344, and the conspiracy statute, 18 U.S.C. § 1349.

64. As such, the Defendant Properties and Defendant Funds are subject to forfeiture, pursuant to 18 U.S.C. § 981(a)(1)(C), as property which constitutes or is derived from proceeds traceable to a substantive violation and conspiracy to violate § 1344.

COUNT THREE -- FORFEITURE
(18 U.S.C. § 981(A)(1)(A))

65. The United States incorporates by reference the allegations set forth in Paragraphs 1 to 58 above as if fully set forth herein.

66. Persons known and unknown acted individually and conspired together to transmit and transfer funds related to the Defendant Properties and Defendant Funds from a place in the United States to or through a place outside the United States or to a place in the United States from or through a place outside the United States, with the intent to promote the carrying on of violations of the penalties of IEEPA and the bank fraud statute, in violation of 18 U.S.C. §§ 1956(h), 1956(a)(2)(A).

67. As such, the Defendant Properties and Defendant Funds are subject to forfeiture to the United States, pursuant to 18 U.S.C. § 981(a)(1)(A), as property involved in transactions in violation of 18 U.S.C. § 1956(h), 1956(a)(2)(A), or as any property traceable to such property.

COUNT FOUR -- FORFEITURE
(18 U.S.C. § 981(A)(1)(G)(I))

68. The United States incorporates by reference the allegations set forth in Paragraphs 1 to 58 above as if fully set forth herein.

69. The IRGC is a designated foreign terrorist organization.

70. This above described scheme involves the IRGC's unlawful access of the U.S. financial system to support illicit shipments to and from Iran to destinations including Syria. The Defendant Properties are ultimately controlled by the IRGC. Additionally, as noted in the designation, the Al Aqili Group arranged oil sales for the IRGC. Thus, the assets of related companies to the Al Aqili Group, such as Paradise Global, are sources of influence for the IRGC.

71. As such, the Defendant Properties and Defendant Funds are subject to forfeiture to the United States, pursuant to 18 U.S.C. § 981(a)(1)(G)(i), as assets of a foreign terrorist organization engaged in planning or perpetrating any Federal crime of terrorism (as defined in section 2332b(g)(5)) against the United States, citizens or residents of the United States, or their property, and as assets affording any person a source of influence over any such entity or organization.

* * *

PRAYER FOR RELIEF

WHEREFORE, the United States prays that notice issue on the Defendant Properties as described above; that due notice be given to all parties to appear and show cause why the forfeiture should not be decreed; that judgment be entered declaring that the Defendant Properties be forfeited to the United States for disposition according to law; and that the United States be granted such other relief as this Court may deem just and proper, together with the costs and disbursements of this action.

Dated: 16th day of August, 2019
Washington, D.C.

Respectfully submitted,

JESSIE K. LIU
United States Attorney
D.C. Bar Number 472-845

By: /s/

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VERIFICATION

I, Thomas Tamsi, a Special Agent with the Homeland Security Investigations, declare under penalty of perjury, pursuant to 28 U.S.C. § 1746, that the foregoing amended Verified Complaint for Forfeiture *In Rem* is based upon reports and information known to me and/or furnished to me by other law enforcement representatives and that everything represented herein is true and correct.

Executed on this 16th day of August, 2019.

/s/

Special Agent Thomas Tamsi
Homeland Security Investigations

I, Cindy Burnham, a Special Agent with the Federal Bureau of Investigation, declare under penalty of perjury, pursuant to 28 U.S.C. § 1746, that the foregoing amended Verified Complaint for Forfeiture *In Rem* is based upon reports and information known to me and/or furnished to me by other law enforcement representatives and that everything represented herein is true and correct.

Executed on this 16th day of August, 2019.

/s/

Special Agent Cindy Burnham
Federal Bureau of Investigation

Exhibit A

OIL TANKER – “GRACE 1” (IMO 9116412)

