

## Use of Aliases by designated Iranian Company “Neka Novin”

- As you are aware, on May 23, 2011, the EU designated the Iranian company Neka Novin for its involvement in the procurement of specialized equipment and materials that have direct application in the Iranian nuclear program. The United States also designated Neka Novin on November 20, 2011.
- We would like to alert you to the fact that since Neka Novin was sanctioned by the EU, the company has been using an alternate name - Niksa Nirou - to facilitate procurements.
- As you are aware, Iran frequently uses deceptive tactics to obtain items in support of its nuclear activities, such as the use of front companies and falsified shipping documents. We believe Neka Novin's use of the alias Niksa Nirou is one of these deceptive practices.

Specifically, Neka Novin has been using this alias when seeking price quotes from various foreign suppliers and in shipment preparations.

- On at least one occasion, a Neka Novin employee instructed that no mention of their company, or the destination of Iran, should be made during negotiations - ostensibly to ensure that the transaction was not rejected by any banks or customs officials.
- We believe the use of this alias demonstrates Neka Novin's awareness of sanctions and willingness to adapt in order to continue its proscribed activities.
- As a strong nonproliferation partner, we request that your government investigate this activity and take all necessary action to ensure that no company in your country supplies or facilitates the supply of any commodity to Neka Novin, or any of its aliases.
- States must remain vigilant to these tactics when considering transfers to ensure the items are not diverted to support Iran's proscribed nuclear activities. We want to work with your government to ensure that companies are not unwittingly assisting Iran's efforts to procure sensitive technology, possibly implicating them in sanctions violations.
- We encourage you to request that your companies inform your government of any suspicious procurement attempts from Iran or third parties. We also ask that you notify the United States and the IAEA of any suspected procurement attempts by Iran so that we can all better track and prevent Iran's efforts to evade UN and other multilateral sanctions against its proscribed nuclear entities.
- We appreciate your assistance with this matter and look forward to receiving your response.