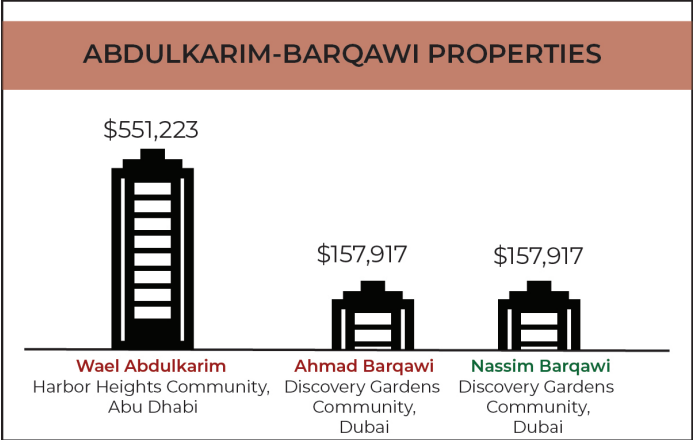


USE OF REAL ESTATE

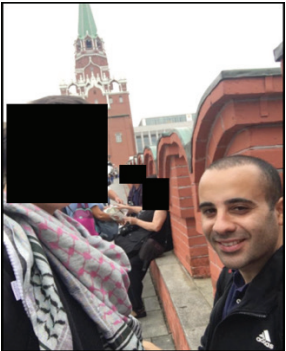


The Barqawi and Abdulkarim families, interrelated through marriage, are tied to three properties in the UAE cumulatively worth an estimated \$867,067.^{3 4} The phone numbers, addresses, and emails used on these property listings match those included on the official US sanctions designation and public commercial listings for **Pangates International** and **Morgan Additives Manufacturing Co.**, both of which were sanctioned as key companies within the fuel smuggling network. The two properties directly tied to the sanctioned individuals are listed below:

Ahmad Barqawi’s brother, **Nassim Barqawi**, is also linked to one property, which is listed below. Nassim Barqawi served as the General Administrative Manager at Morgan Additives Manufacturing Co., a position he still includes on his Zoominfo corporate networking profile.^{5 6 7} He allegedly also served as a shareholder of the sanctioned Pangates International.⁸ Properties associated with Nassim Barqawi in the reviewed data used the same address as the sanctioned Morgan Additives.⁹

Social media profiles affiliated with these three men indicate that they have lived in the UAE as recently as March 2018.¹⁰ Additionally, Barqawi and Abdulkarim have apparently continued to travel internationally despite existing sanctions meant to restrict their movement abroad. According to posts from their social media accounts, Ahmad Barqawi traveled to Russia in July 2015 and again in July 2017, while Wael Abdulkarim traveled to Turkey in July 2015.^{11 12 13}

These identifiers also help to confirm the nexus between the sanctioned network and unsanctioned individuals and companies, many of which appear to be active as of May 2018. For instance, data from the Panama Papers list **Adnan Naim Ibrahim Abdul Karim**, who is not subject to US or EU sanctions, as one of only two shareholders for the sanctioned companies Maxima Middle East and Pangates International.^{14 15} The Panama Papers also indicate that Adnan served as the sole known shareholder of the unsanctioned company **Vectra International Trading Co.**, an entity registered in the Seychelles for which public information appears nonexistent.¹⁶



Ahmad Barqawi on a trip to Moscow, Russia in July 2017. Source: Facebook

INVOICE			
MAKINA GREASE & LUBRICANTS MANUFACTURING LLC		Invoice No	
AL SAJAA		Invoice Date	
Tel 05; Fax 06-5310224		Job No	
Attn : ATTN: ENGR. FERAS TASHIR		Customer Ref	
		User / SP	
Service Details For FLEXI TANK			
Shipper	:	Master Doc No.	:
Consignee	:	House Doc No.	:
Origin	:	ETA/ETD	:
Destination	:	A/Weight	:
Flight	:	C/Weight	:
Commodity	:	Volume	:
No of Pags	:		
HL Particulars	UOM	Qty	
1 ALL INCLUSIVE CHARGES	CNTR	5.00	
(JAE) THIRTY ONE THOUSAND FORTY SIX AND 11/100 ONLY			
Container No :			
Acc Name	:	SUN LOGISTICS LLC	Bank Name
Acc Number	:	101-50173327-01 (AEED) 102-50173327-02 (USD)	Swift Code
IRAN No	:	AE790260001015017332701 (AEED) AE870260001025017332702 (USD)	
Remarks	HL NO. DX80342889		
For	SUN LOGISTICS LLC		

An excerpt from a bill of lading, showing Makina Grease & Lubricants Manufacturing LLC shipping base oils to Syria in December 2016. Source: Sun Logistics (India)

Pangates International and Maxima Middle East were both sanctioned for arranging illicit fuel and base oil shipments to the regime in Syria.¹⁷ Many of their unsanctioned commercial partners—companies connected by shared identifiers and officers—may similarly serve as a bridge between the sanctioned and unsanctioned economies. For example, the former Syrian point of contact for Pangates International in the UAE now owns and runs his own company, the UAE-based **Makina Grease & Lubricants Manufacturing L.L.C.**^{18 19 20} The company, which specializes in fuel and petroleum products exports and trade, declares on its website that it exports to Lebanon and Iraq, with an operating revenue of \$3 million in 2016.²¹ However, shipment documents from December 2016 show that Makina shipped medium base oils (used as lubricants in industrial machinery, such as that found in refineries)²² to the Syrian port of Latakia—16 months after the most recent sanctions against the Barqawi-Abdulkarim network.²³ As such, unsanctioned companies like Makina that maintain close ties to the original sanctioned Barqawi-Abdulkarim network could represent a significant risk for ongoing fuel and base oil shipments into Syria in violation of existing sanctions.

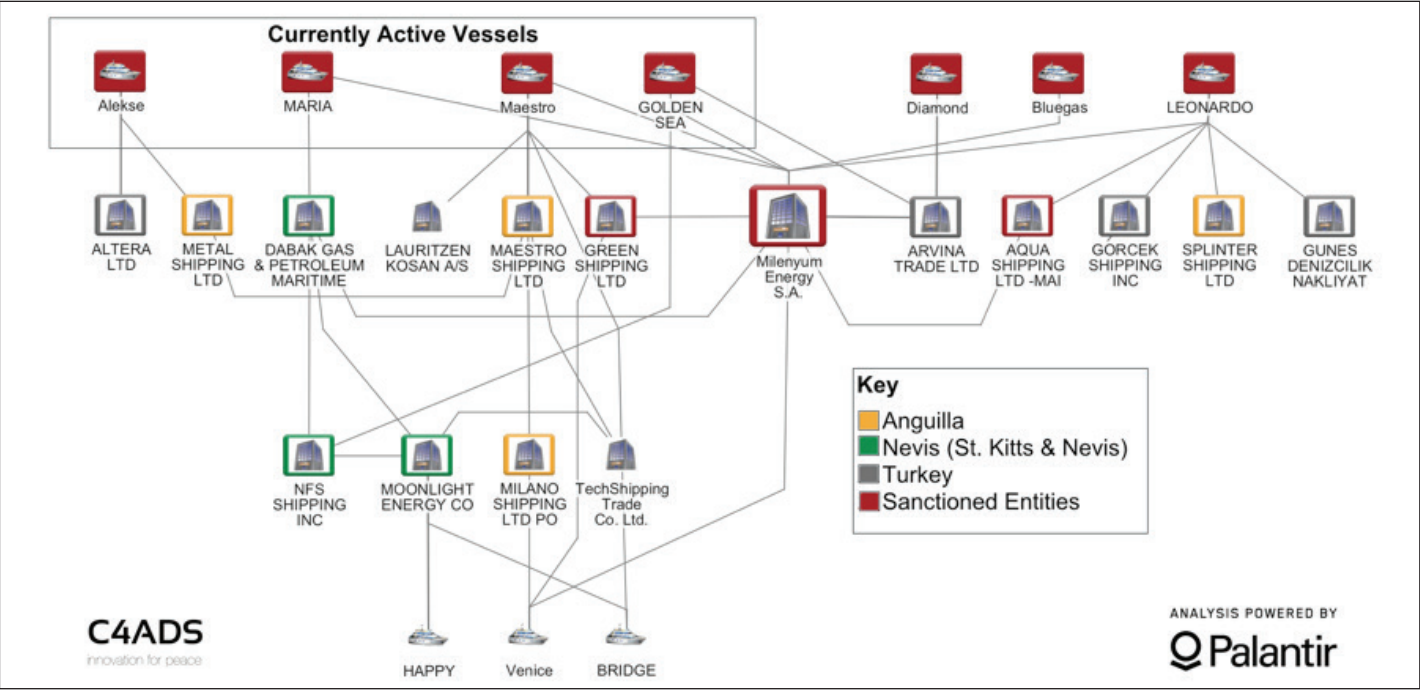
CONTINUED FUEL SMUGGLING ACTIVITY

Many of the vessels sanctioned as a part of the Barqawi-Abdulkarim network were active as of May 2018, and seemed to be shipping fuel to Syria at that time. Almost all of these vessels appear to have changed their names and identifying information, and to have changed ownership to new, unsanctioned entities directly associated with the original sanctioned companies.²⁴

For example, **Milenyum Energy S.A.**, registered in Panama and operating out of Turkey, was sanctioned in August 2015 for arranging regular fuel shipments to the Syrian Government as part of the Barqawi-Abdulkarim network.²⁵ Notably, a single shipment in February 2015 was valued at over \$7 million.²⁶ After Milenyum was sanctioned, two of the vessels that had also been sanctioned changed their names and switched ownership to a company based in Turkey, **Arvina Trade Ltd.**²⁷ Arvina Trade shares two phone numbers with Milenyum Shipping, and according to Equasis data retrieved in May 2018, Arvina owns these two sanctioned vessels, one of which appeared to ship fuel to Syria as of May 2018.^{28 29 30} In addition, a phone number used by Arvina and Milenyum is registered to an individual named only as “Ufuk,” a possible reference to **Ufuk Kenar**, the director and secretary of Milenyum who was sanctioned by the US Department of the Treasury for his direct involvement in these fuel procurement schemes.^{31 32 33} Entities like Arvina Trade, which have ties to the original sanctioned companies owning these vessels, show how Abdulkarim and Barqawi could use new commercial organizations to obfuscate ownership and continue regular shipments of fuel to Syria.

Of the seven vessels sanctioned alongside Milenyum, five maintained shipping operations after being sanctioned.³⁴ Four of these vessels have transported fuel shipments into Syria within the last few months, with three operating as recently as May 2018 along the same routes for which they were originally sanctioned, according to maritime domain awareness technology.^{35 36} Since August 2015 (the date of the original vessel designations), the sanctioned vessels have cumulatively conducted an estimated 47 trips transporting fuel from Ukraine and Russia to Syria under new names, identifiers, and owners.³⁷ Some of these vessels have also transported shipments from Croatia to Syria, a previously unidentified supply line within this network.³⁸ Of the companies that now own these vessels, there are **six unsanctioned companies**, several of which are incorporated in secrecy jurisdictions such as Anguilla and St. Kitts & Nevis. Of these six unsanctioned companies, three share the exact same address in Anguilla and three share an identical address in St. Kitts & Nevis.³⁹

Finally, there are an additional five vessels and three companies that match the transit patterns, owners, and managers of the original sanctioned vessels. Just one of these vessels—the MV Venice—conducted approximately 27 trips transporting fuel between Ukraine, Russia, Croatia and Syria between April 2015 and May 2018.⁴⁰



Palantir chart showing connections between the sanctioned vessels, their past and current ownership, and other companies and vessels of interest. Color coded by jurisdiction.

The vessels in the Barqawi-Abdulkarim network, including those currently in operation, typically load their petroleum cargo in Kerch, Ukraine; Temryuk, Russia; and Rijeka, Croatia, before offloading at Baniyas, Syria.⁴¹ These vessels often go dark, losing their Automatic Identification Signal (AIS) while entering and exiting the port at Kerch—a pattern corroborated by local bloggers, who allege that on January 16, 2018 one of the sanctioned ships (the **MV Alekse**) loaded 2,400 tons of liquefied gas in Kerch while not transmitting its AIS signal.⁴²

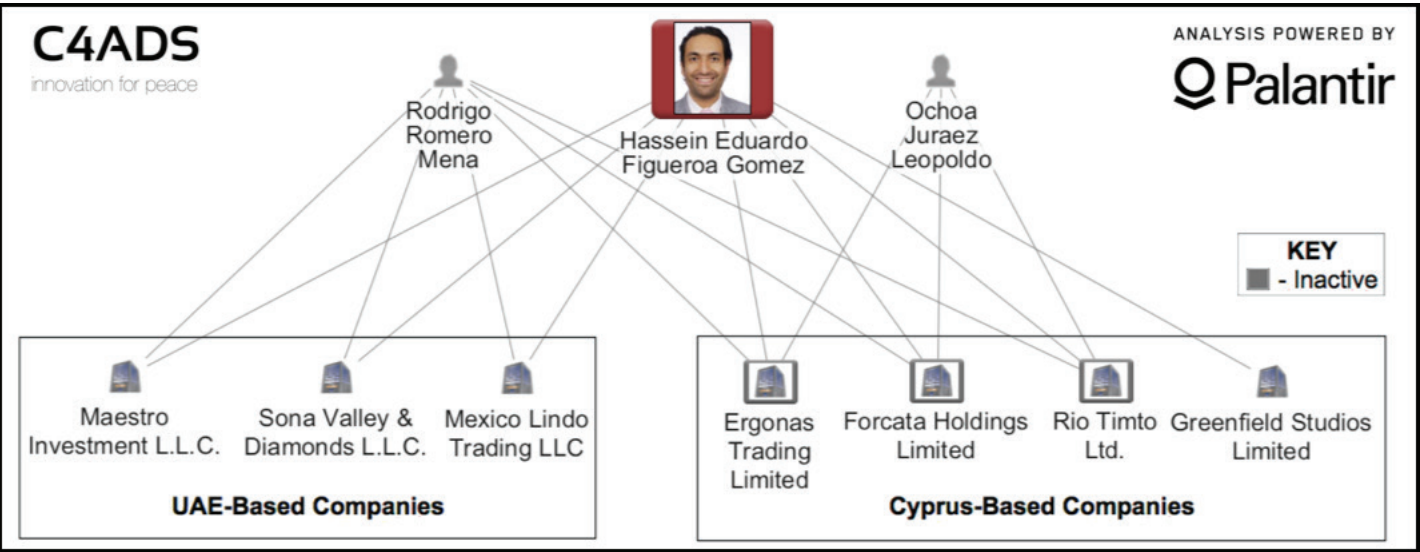
USE OF REAL ESTATE



Figueroa Gomez is affiliated with three luxury properties in Dubai with an estimated total value of \$4.34 million.^{5 6 7} The properties attributed to Figueroa Gomez were confirmed through a combination of information—including phone numbers, emails, and physical addresses—used in the original US sanctions designation, UAE real estate data, and corporate records for his unsanctioned companies.

Figueroa Gomez listed the property in Marina Heights as his address for several Cypriot companies for which he served as a director and shareholder.^{8 9 10 11} This address also ties to the shipment of a luxury vehicle from the UAE to the US in 2016.¹² It is unclear if Figueroa Gomez held this property at the same time.

In addition to his property holdings, Figueroa Gomez is also a director and shareholder of three companies in the UAE. These companies deal in trade, investment, and the sale of crystal and glass products. The credit report for **Maestro Investment LLC** indicates that the Dubai-based company was involved in real estate and also had a project in Guadalajara, Mexico in 2011.¹³ All three companies were founded prior to Figueroa Gomez's 2012 designation, but continued operations through at least 2014, 2016, and 2016 respectively based on the most recent corporate filings.^{14 15 16} Credit reports for these companies do not show current activity as of May 2018.^{17 18 19} However, there is no further information available in the open source on the operations or status of these companies.



According to the Cypriot corporate registry, Figueroa Gomez has also owned and operated four companies in Cyprus, one of which is still active but which may be dissolved pending continued inactivity. These companies all shared the same address, that of their local agent.²⁰ This is a common pattern, particularly in non-transparent jurisdictions like

Cyprus, where companies use the contact information of a local corporate services provider to avoid providing identifying information.²¹ Figueroa Gomez's companies operated in general trading, investment, construction, and real estate.^{22 23 24} Similar to the pattern observed in the UAE, these companies were incorporated prior to Figueroa Gomez's designation in 2012 but continued operating for a number of years afterwards. All but one of the companies were rendered inactive in 2015.^{26 27 28 29} The one listed as active as of May 2018, **Greenfield Studios Limited**, is the only company 100% owned by Figueroa Gomez, although it was given a three month notice of dissolution pending further inactivity in October 2017, a full five and a half years after Figueroa Gomez's designation.^{30 31} However, the company appeared to be listed in the corporate registry with the same status as of May 2018.³²

UNSANCTIONED CORPORATE PARTNERS

Along with Figueroa Gomez, there are two additional co-directors and shareholders of interest across the seven unsanctioned companies. The first is a Mexican national, **Rodrigo Romero Mena**, who is the only other co-director and shareholder associated with the three UAE companies affiliated with Figueroa Gomez.^{33 34 35 36} Though there is little personal information on Mena, he is listed in the examined property data as being associated with a penthouse property in Dubai, in the luxury **Pentominium Tower** that has yet to be completed as of 2018.^{37 38} Mena also served as a co-director on three of the four Cypriot companies affiliated with Figueroa Gomez before they became inactive.^{39 40 41}

MEXICO LINDO TRADING LLC [CRiS No AEC1234321]

Capital			
Authorised	AED	300,000	
Paid Up	AED	300,000	

SHAREHOLDERS

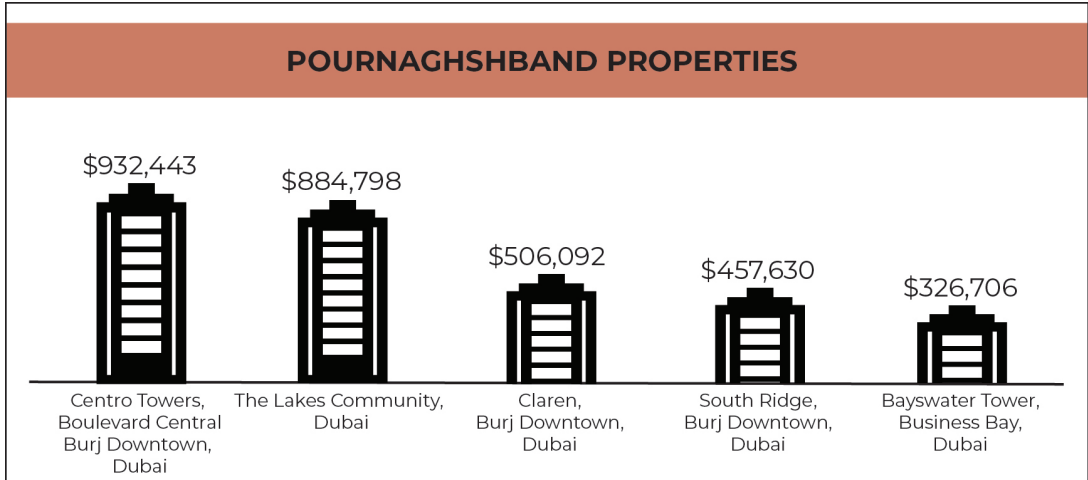
		%
Name	Mr. Tharwat Hasan [CRiS No AEP1670637]	51.00 %
Nationality	UAE National	
Name	Mr. Rodrigo Romero Mina [CRiS No MXP1426329]	10.00 %
Nationality	Mexican	
Languages	English	
Name	Mr. Hussain Edwardo Fegrero Gomez [CRiS No MXP1426331]	39.00 %
Nationality	Mexican	

Excerpts from corporate registration documents for one of Figueroa Gomez's three companies in the UAE, showing his overlapping ownership with Rodrigo Romero Mina. Source: Cedar Rose

Separately, Mena is a director for one additional active company, registered in Canada in 2016, for which there is no further information on the nature of its activities.⁴² He appeared on Canadian corporate records as a director for this company alongside three other individuals, one of whom is a Mexican national, and who shares an address with Mena in Jalisco, Mexico, suggesting a previously undiscovered potential nexus back to Mexico. Based on his ownership and co-directorship of companies in the UAE and Cyprus, it appears that Mena is a longtime associate of Figueroa Gomez, working alongside him both before and after his designation as a narcotics kingpin.

The other co-director and shareholder was a Mexican national named **Ochoa Juraz Leopoldo**. Leopoldo served on the same three Cypriot companies as Mena, all of which continued operations after Figueroa Gomez's designation but are now inactive.^{43 44 45} On these companies' official registry filings, Leopoldo listed the same address used by five of the 15 Mexican companies sanctioned alongside Figueroa Gomez.⁴⁶ Local Mexican media sources suggest that Leopoldo may have been a Mexican drug trafficker involved in the cartel's Middle East business relations before he was killed in drug-related violence in December 2012.^{47 48}

USE OF REAL ESTATE



The property data indicate that Pournaghshband has been associated with five properties in Dubai valued at \$3.11 million.^{15 16}

Pournaghshband's properties are associated with multiple phone numbers, emails, and an address shared with Mabrooka Trading.¹⁷ Pournaghshband's contact information associated with the properties in the data also matched multiple commercial listings for a cargo and logistics company with operations in the UAE and China, both of which are jurisdictions where Pournaghshband's network previously operated.¹⁸

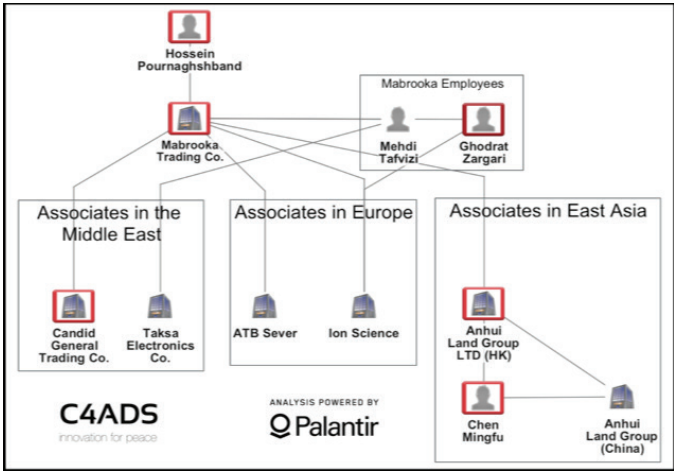
POURNAGHSHBAND'S & MABROOKA'S EXPANDED CORPORATE NETWORK

Pournaghshband has maintained a number of additional relevant corporate affiliations, including relationships with unsanctioned companies whose operations span the UAE, Iran, China, and beyond. For example, and as discussed below, Mabrooka Trading has exhibited a historical commercial relationship with **ATB Sever**, a Serbian company within the ATB Group.¹⁹ As indicated on its website, ATB Sever manufactures electromotors for use in a range of technical contexts, including “nuclear and thermal power plants.”²⁰ In addition to jointly attending conferences with Mabrooka Trading in 2011, Sever used a Mabrooka email as its contact information in an Iranian oil and gas commercial directory.^{21 22} ATB Sever also claimed a trading relationship with Iran, currently serves as a supplier for the Iranian company Atoorsanat, and included Iran under the areas of expertise for four employees on its website as of May 2018.^{23 24 25}

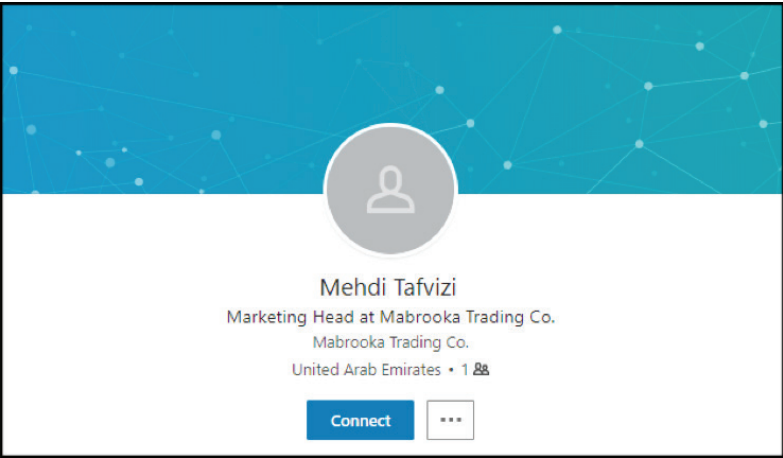
Separately, **Taksa Co.**, a Dubai-based electronics distributor, shared its phone number, fax number, and address with Mabrooka Trading and Candid General Trading – information also associated with Pournaghshband-linked properties.^{26 27} These shared identifiers appear in an online electronic parts marketplace profile for Taksa.²⁸ While “Taksa Co.” does not appear in any other official Dubai registries, the company is similar in name to **Taksa Electronics Company**, an automation and electronic components design and supply company based in Isfahan, Iran.^{31 32} The Iranian company's managing director appears to be **Mehdi Tafvizi**, an individual whose name is identical to a Mabrooka Trading marketing executive.^{33 34}



A picture from Pournaghshband's Facebook shows him at a conference where Mabrooka jointly presented with Sever. Source: Facebook



Pournaghshband, his sanctioned network (highlighted in red), and the unsanctioned corporate connections



A LinkedIn profile for Mehdi Tafvizi stating that he works at Mabrook Trading in the UAE

In 2010, the Mehdi Tafvizi associated with Mabrooka Trading attended a conference in China as a Mabrooka Trading representative.³⁵ His listed email and phone numbers (those of Mabrooka Trading) are associated with properties linked to Pournaghshband in Dubai.^{36 37 38} Based on the commonality in both name and contact information, “Mehdi Tafvizi” may be the same executive associated with the Dubai-Taksa Co., the Iran-based Taksa Electronics Company, the Mabrooka Trading network, and possible activities in China.

THE CHINA ANGLE

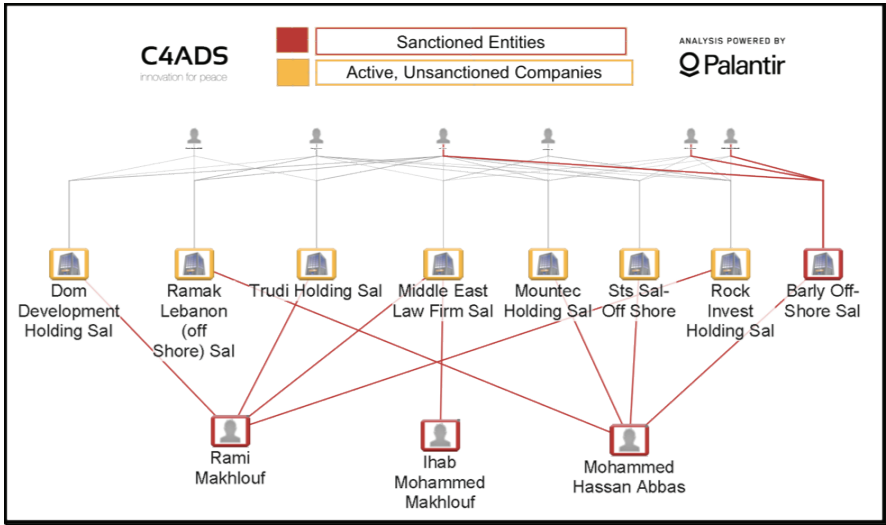
Further exploration of Mabrooka's commercial ties to China revealed a potentially related unsanctioned company that was still in operation as of May 2018. According to his sanctions designation, Pournaghshband worked with Anhui Land Group Co. (formerly named China Mabrooka Trading Company LLC) in Hong Kong, which was sanctioned for procuring carbon fiber-related materials on behalf of Pournaghshband's network.^{39 40} Anhui Land Group in Hong Kong is located in a stall in a Hong Kong mall shared with several other companies, and it bears the same name as a manufacturing company based in mainland China, **Anhui Land Group**.^{41 42 43 44} The Chinese characters for the Hong Kong and mainland companies are nearly identical, differing by only one character, a discrepancy explained by mainland China's use of simplified Chinese versus Hong Kong's use of traditional Chinese.^{45 46} The unsanctioned mainland Chinese company produces measurement instruments, wires, cables, and voltage distributors.⁴⁷ Additionally, the sanctioned director of the Hong Kong-based Anhui Land Group, Chen Mingfu, had resided at one point in Tianchang, Chuzhou, Anhui, China.⁴⁸ This is the same city and province where the mainland Anhui Land Group is located.⁴⁹



A comparison of the Chinese names of the Anhui Land Group in China and Anhui Land Group in Hong Kong reveals that the two are nearly identical, with the difference accounted for by traditional vs simplified Chinese

- **STS Offshore**⁷⁹
- **First Aid SAL**⁸⁰
- **Barly Offshore SAL** (sanctioned)⁸¹

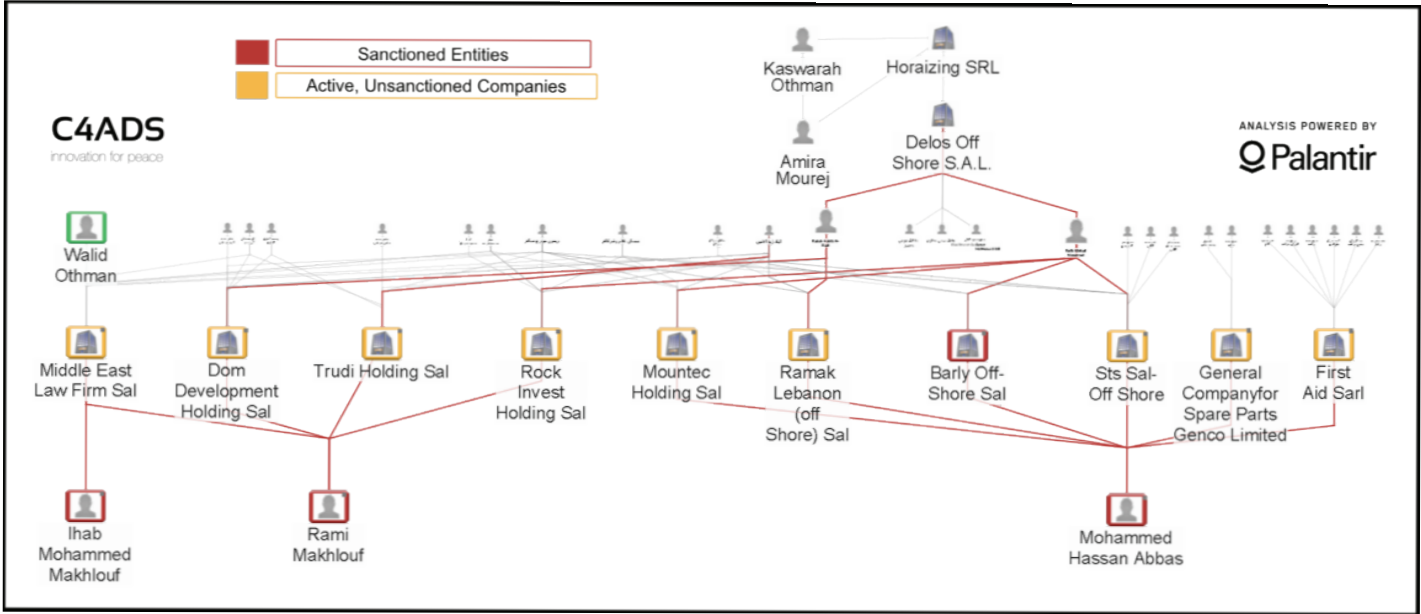
Through his Lebanese companies, Abbas also maintained an indirect relationship with Delos Offshore, the Lebanon-based shareholder in Horaizing SRL that was tied to Rami Makhoulf through shared directors of both his sanctioned and unsanctioned companies. This relationship is further explored below.



Overlap in shareholders between Rami and Ihab Makhoulf's unsanctioned companies and their cousin Mohammed Hassan Abbas' sanctioned and unsanctioned companies in Lebanon. Only overlapping shareholders depicted here. Source: Lebanon Commercial Registry

MAKHOUF'S CONNECTION TO ROMANIA

Rami Makhoulf's mother-in-law, Amira Mourej (also known as Amira Mourei),⁸² is married to **Walid Ali Othman**, the Syrian Ambassador to Romania and former Ambassador to Moldova.^{83 84 85 86} One of Rami's brothers-in-law, **Kaswarah Othman**, was associated with multiple commercial holdings in Romania and Austria that relate back to Rami Makhoulf and his corporate network.^{87 88}



Highlighted in red, connections between the Mourej family, Delos Offshore SAL and its officers, and Lebanese companies linked to the sanctioned Rami Makhoulf, Ihab Makhoulf, and Mohammad Hassan Abbas. Source: Lebanon Commercial Registry

In Romania, Mourej's family purchased military land in 2014, which had been used by NATO forces as recently as July 2017, using a company that maintained connections with sanctioned individuals, including Rami Makhoulf.⁸⁹ Kaswarah Othman, son of Mourej, became a prominent shareholder in the Romanian company **Horaizing SRL** in 2009, shortly after the company purchased a portion of the Capu Midia military base.⁹⁰ Mourej later reportedly took over her son's shares.⁹¹ Then, in 2014, Horaizing was acquired by **Delos Offshore SAL**, a Lebanon-based company.⁹² Through shared

employees, Delos Offshore had ties to seven other companies owned or managed by Rami and Ihab Makhoulf and their sanctioned cousin, **Mohammed Hassan Abbas**, as of May 2018.⁹³ Only one of these companies (Barly Off-shore SAL) is sanctioned, and the remaining six appeared to be active as of May 2018.⁹⁴ The chart above illustrates these relationships.

CONCLUSION

Rami Makhoulf was sanctioned for acting as both a principal enabler of the Syrian regime and a benefactor of regime corruption. Despite multiple individual and company-specific sanctions designations, Makhoulf and his network appear to maintain a much more extensive corporate footprint, with companies currently operating outside of Syria, as well as \$3.17 million in luxury property associated with Rami's sanctioned brother, Ihab. These properties shared identifiers with unsanctioned companies in the UAE and Syria, as well as multiple Makhoulf associates who helm commercial enterprises across Lebanon, Romania, Austria, and other offshore jurisdictions. The related Romanian companies' holdings include land used by NATO troops for military exercises. Through corporate networks such as these, only a fraction of which were likely uncovered here, the Makhoulf family is able to continue evading sanctions and supporting the Syrian war economy while leading luxurious lifestyles abroad.

THE UNSANCTIONED CORPORATE PARTNERS

Although the Amhaz brothers and their sanctioned affiliates had an expansive corporate network surrounding them, five individuals stand out. These individuals either related directly to sanctioned companies or appeared in documents as being tied to unsanctioned companies alongside the Amhaz brothers. As detailed in the following sections, these connections separately link the larger network to other small electronics companies, grand corruption in Liberia, money laundering through Lebanon, and US real estate holdings.

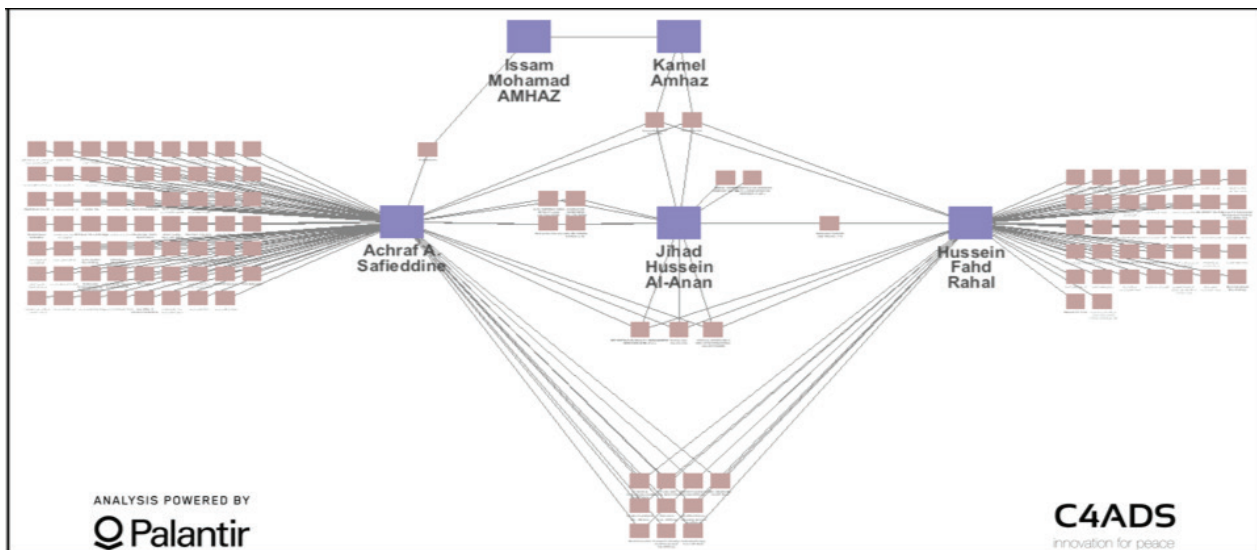
Mohammad Jawdat Ayesb Mustapha Al Barghouthy and **Ali Mohammad Salem Abu Adas**, as noted above, have had significant commercial real estate investments in the UAE and appear to have been tied to sanctioned companies with Kamel Amhaz. It is important to note that corporate records do not indicate the strength and nature of relationships between these actors nor their current degree of involvement in shared commercial activities. Al Barghouthy was the majority shareholder of the sanctioned Unique Stars Mobile in the UAE according to commercial credit reports from August 2014.³⁷ Al Barghouthy and Abu Adas appear to have been listed as founders of the sanctioned Fast Link SAL in Lebanon, according to the Lebanese Ministry of Justice and commercial credit reports.^{38 39} Additionally, Al Barghouthy and Abu Adas co-own a network of four cell phone companies in Dubai.⁴⁰ Commercial credit reports for two of these unsanctioned companies have listed the same address as the sanctioned Unique Stars Mobile Phones LLC.⁴¹

One of the unsanctioned companies, **Fast Telecom General Trading LLC**, was listed in commercial credit reports as an affiliate of the sanctioned company Unique Stars Mobile Phones.⁴² Records reviewed indicate that the name of Fast Telecom was changed from Fast Link Mobile LLC in September 2014 to Fast Telecom, eight weeks after the designation of Fast Link Mobile SAL in Lebanon.⁴³

Separately, **Hussein Fahd Rahal**, **Jihad Hussein El Annan**, and **Achraf Assem Safieddine** have each, at one time, been listed on Lebanese Ministry of Justice documents alongside Kamel Amhaz.^{44 45} These three individuals have also been associated with a number of other Lebanese companies, often overlapping in corporate affiliations, as shown in the chart below. This network includes a company named **Special Operations Group**, founded by Kamel Amhaz, which renewed a weapons import license through the Lebanese government that was valid through 2016.^{46 47 48 49 50} According to records from the Lebanese Ministry of Justice, Amhaz may no longer hold shares in the company,^{51 52} but it appeared to be active as of May 2018.⁵³

Achraf Assem Safieddine is a lawyer active in Lebanon who appeared on Lebanese Ministry of Justice records as the legal representative for the sanctioned company **Teleserve Plus**.⁵⁴ Safieddine was also affiliated with two of Kamel Amhaz's unsanctioned companies in Lebanon, as well as 17 other companies alongside the aforementioned El Annan and Rahal.⁵⁵ In addition to these 19 companies, there are 62 additional telecommunications, shipping, and trade companies for which Safieddine is a legal representative, shareholder, founder, or director.⁵⁶ Safieddine's law offices claim to have a sister company in the US, an angle explored further below.⁵⁷

Safieddine has been associated with two Lebanese law firms, **Law Offices of Achraf A. Safieddine** and **Safieddine, Khoury and Jezzni Law Office**. The first law firm's website, as of May 2018, listed services including offshore company incorporation (including in multiple secrecy jurisdictions), real estate acquisition in Lebanon and the US, and advice on legal defense regulations for the US, Lebanon, Qatar, the Czech Republic, and other jurisdictions.⁵⁸ Through this firm, Safieddine has been associated with at least four companies dealing in weapons and security.⁵⁹ ⁶⁰ Two of the security companies that the law firm claimed to have worked with were founded, owned, or managed by Safieddine, El Annan, Rahal, or Kamel Amhaz.⁶¹



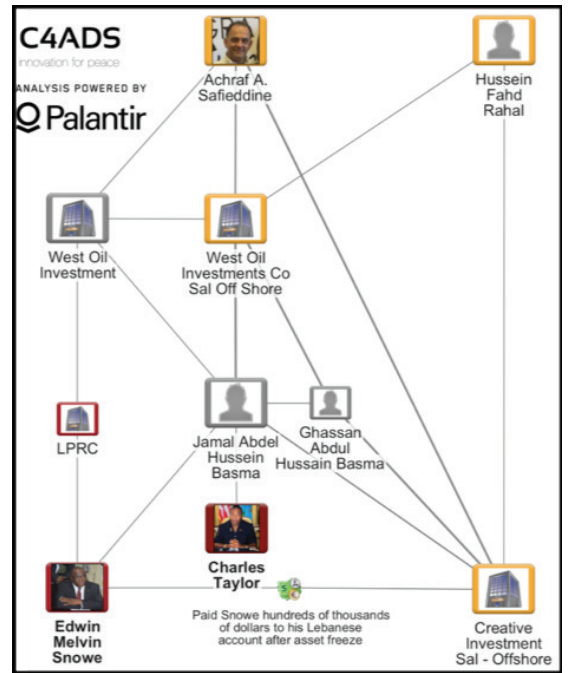
The Lebanese corporate holdings of Safieddine, El Anan, and Rahal show a high degree of convergence, including overlap with Kamel Amhaz

THE WEST OIL SCANDAL

Upon further investigation, one of Safieddine's Lebanese companies reveals its involvement in previously reported illicit activity. On his Bayt.com professional networking profile, Safieddine claimed to have founded and formerly served as an associate to the CEO for **West Oil Investment**, one of the two largest petroleum importers in Liberia as of 2014.^{62 63} He also claimed that West Oil was a "family business."⁶⁴

One of Safieddine's business partners in West Oil Investment, **Jamal Abdelhussein Basma**, was blacklisted in 2001 by the UN and prohibited from traveling due to his role as an "informal advisor" to former Liberian President Charles Taylor.⁶⁵ Despite this restriction, the Liberian Chamber of Commerce listed Basma as President of West Oil Investment in Liberia as recently as April 2018.⁶⁶ Both Basma and Safieddine were also listed as officers in the Lebanon-based **West Oil Investments Co Sal Off Shore**, for which Safieddine appeared as a registered founder and legal representative in Lebanese Ministry of Justice documents, while Basma appeared as a founder, shareholder, manager, authorized signatory, and the President of the Board in Lebanese Ministry of Justice documents.⁶⁷

Previous investigations by the UN Panel of Experts (UNPOE) in Liberia found that West Oil Investment, along with two other companies tied to Basma, colluded with **Edwin Melvin Snowe**, former director of the state-owned Liberian Petroleum and Refining Company (LPRC), who also happens to be the former son-in-law of Charles Taylor.^{68 69} West Oil was accused of defrauding the UN Mission in Liberia (UNMIL) of \$1.77 million by overcharging UNMIL.⁷⁰ In August 2004, the UN, under Security Council Resolution 1532, froze Snowe's assets for his involvement in this corrupt self-enrichment scheme.⁷¹



The relationships underpinning the Liberian West Oil Scandal

The UNPOE investigation also discovered that throughout this corruption scheme, Snowe maintained a personal bank account in Lebanon that received hundreds of thousands of dollars from the Lebanese company **Creative Investments SAL**.⁷² These transfers continued after Snowe's assets were frozen by the UN in 2004.⁷³ Corporate records published by the Lebanese Ministry of Justice listed four employees for Creative Investments SAL, three of whom are Jamal Abdelhussein Basma, **Ghassan Basma** (his relative), and Achraf Safieddine, who was listed as the company's founder, shareholder, member of the board, and legal representative.⁷⁴ This discovery suggests that not only did Safieddine have ties to the company that allegedly originated the fraud and corruption scheme, but he also had a connection to the company that transmitted the corrupt proceeds from Liberia to Lebanon, likely through the international financial system.

[illegible][illegible]

Registration documents from the Lebanese Commercial Register show Jamal Basma and Achraf Safieddine in their roles with West Oil Investment and Creative Investment. Source: Lebanese Commercial Registry

THE US NEXUS

Safieddine maintained significant ties to the United States. The website for his Lebanese law firm, The Law Office of Achraf A Safieddine, listed **Premiere Equities Group** as a sister company in the US as recently as May 2018.⁷⁵ As indicated on the law firm's website, Premiere Equities Group in Canoga Park, California (CA), provided real estate investment services and was located at 7353 Canoga Ave., Canoga Park, CA 91303.⁷⁶ Safieddine also listed Canoga Park, CA as his location on what appeared to be his Twitter account.⁷⁷ There is no company in California going by this exact name, but business records from the California Secretary of State show that the similarly-named company **Premiere Equities and Investment Group Inc.** was registered at the exact same address in 2008 and listed an individual named **Bill Jamal** as owner and sole registered director.⁷⁸ Jamal was listed as the sole registered director for eight additional companies also registered at the same address.^{79 80}