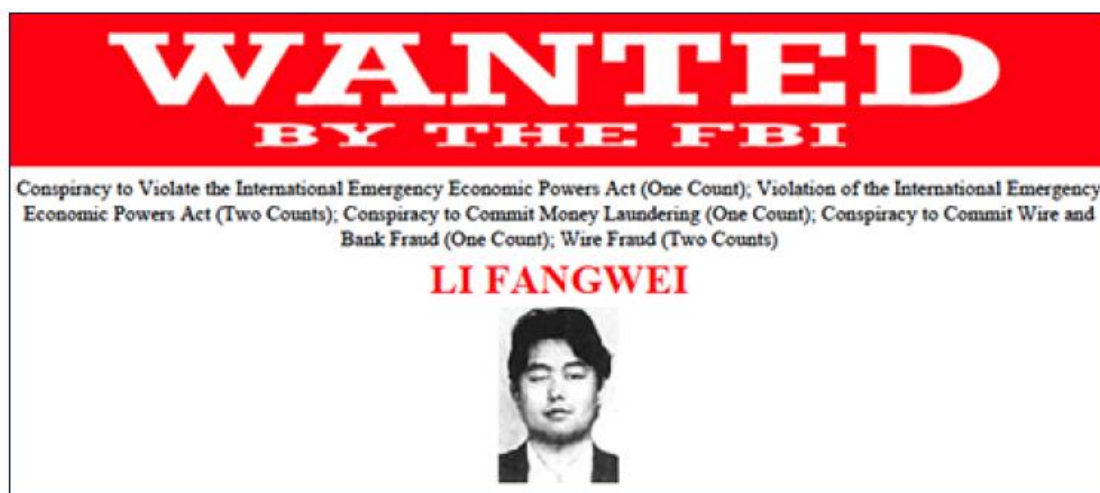


2015年4月15日版<外国ユーザーリスト>新登場の中国組織

今回の改訂では中国組織の数が、28から43と大幅増です。ではどんな連中が新たに加わったのかザッと見てみましょう。

1. 半数以上（8社）は李方偉案件

<外国ユーザーリスト>…以下<リスト>と略記…の#475にLIMMT経貿公司という長年掲載の「常連」がありますが、その経営者が李方偉（簡体字表記 李方伟）ことKarl Leeです。イラン弾道ミサイル開発につながる取引を行ったかどで同社が米国の制裁対象となり、更には本人に五百万ドルの懸賞金がかけられています。



View poster

今回<リスト>に掲載された8社の顔触れは次の通りです。

#467	Dalian Zhenghua Maoyi Youxian Gongsi
#468	Dalian Zhongchuang Char-White Co., Ltd.
#472	Karat Industry Co., Ltd
#476	MTTO Industry and Trade Limited
#483	Sinotech Dalian Carbon and Graphite Manufacturing Corporation
#484	Sinotech Industry Co., Ltd.
#486	Success Move Ltd
#487	Tereal Industry and Trade Limited

基本的にはペーパーカンパニーに毛の生えたような存在と思われますから、「まともな商売」の中でお付き合いする場面は滅多にないことと思います。（それゆえ、漢字表記の調査は省略しました）

李方偉と前記 8 社に関する米財務省のプレスリリースを引用します。

(<http://www.treasury.gov/press-center/press-releases/Pages/jl2372.aspx> より)

## **Treasury Targets Networks for Facilitating Iran’s Ballistic Missile Procurement and Supporting Oil Sanctions Evasion**

4/29/2014 Page Content

Underscores U.S. Commitment to Enforce Iran Sanctions Worldwide

**WASHINGTON** – Today the U.S. Department of the Treasury sanctioned individuals and entities for aiding Iranian ballistic missile procurement and for support to the Government of Iran in evading oil sector sanctions pursuant to Executive Orders (E.O.) 13382 and 13645, respectively. Today’s actions demonstrate the U.S. Government’s commitment to vigorously enforce existing U.S. sanctions even as we implement the sanctions relief contained in the Joint Plan of Action between the P5+1 and Iran. These actions are intended to deter future sanctions evasion and prevent Iran from procuring sensitive technologies while we negotiate a comprehensive solution that will prevent Iran from obtaining a nuclear weapon and ensures its nuclear program is exclusively peaceful.

“Treasury designated proliferator **Karl Lee** several years ago **for procuring ballistic missile parts for Iran, and today’s actions take aim at his network of front companies**. In addition, we are taking action today against a firm and several individuals involved in shady and deceptive oil deals with Iran,” said Under Secretary for Terrorism and Financial Intelligence David S. Cohen. “As we have made clear, we will continue vigorously to enforce our sanctions, even as we explore the possibility of a comprehensive deal addressing Iran’s nuclear program.”

### **Iran’s Missile Proliferation Activities**

Treasury is sanctioning the following entities pursuant to E.O. 13382, which, among other things, targets proliferators of weapons of mass destruction and their support networks.

### **Karl Lee (aka Li Fangwei) Front Companies**

Treasury designated eight China-based front companies for acting for or on behalf of Karl Lee, a known proliferator for Iran’s ballistic missile program. **Karl Lee (aka Li Fangwei)** was designated pursuant to E.O. 13382 in April 2009, as the commercial manager of **LIMMT Economic and Trade Company Ltd.** Additionally, several aliases for LIMMT

were also identified in April 2009. LIMMT Economic and Trade Company Ltd. was designated pursuant to E.O. 13382 in June 2006 for providing material support to Iran's ballistic missile program.

Following Sino Metallurgy and Minmetals Industry Co. Ltd.'s 2009 designation as an alias for LIMMT, Karl Lee directed companies with which LIMMT had contracts to send funds to other Karl Lee front companies, including **Sinotech Industry Co., Ltd.** and **MTTO Industry and Trade Limited**.

Lee has also used **Success Move Ltd.** and Sinotech Industry Co., Ltd. in his dealings with Iran and to receive funds from Iran for the purchase of goods.

Lee manages **Sinotech Dalian Carbon and Graphite Manufacturing Corporation**, which along with another front company, **Dalian Zhongchuang Char-White Co., Ltd.**, has been used by Lee to send at least 23 separate shipments to Iran. Sinotech Dalian Carbon and Graphite Manufacturing Corporation also uses MTTO Industry & Trade Limited and **Karat Industry Co. Ltd.**, as front companies.

**Dalian Zhenghua Maoyi Youxian Gongsi** (aka Dalian Zenghua Trading Co., Ltd.) is also a front company Lee uses in his financial dealings with Iran. Lee entered into a contract with a Chinese manufacturer in which the Chinese manufacturer agreed to provide an aramid fiber production line to Dalian Zenghua Trading Co., Ltd. After the contract between Dalian Zenghua Trading Co., Ltd. and the Chinese manufacturer was signed, Lee used a bank account previously associated with Karat Industry Co., Ltd., to transmit the down payment for the Iranian company's aramid fiber production line.

Since 2013, Karl Lee has also used and continues to use **Tereal Industry & Trade Limited** as a front company for his dealings with Iran.

(中略)

**Identifying Information**

(中略)

Name: **Sinotech Industry Co., Ltd.**

Address: No. 190 Changjiang Road, Dalian City, China

Name: **MTTO Industry and Trade Limited**

Address: No. 9 Hongji Street, Xi Gang District, Dalian City, China

Name: **Success Move Ltd.**

Address: No. 1109 Zhongshan Road, Dalian, China

Name: **Sinotech Dalian Carbon and Graphite Manufacturing Corporation**

Address: Dalian, China

Name: **Dalian Zhongchuang Char-White Co., Ltd.**

Address: 2501-2508 Yuexiu Mansion, No. 82 Xinkai Road, Dalian, Liaoning Province, 11601 China

Name: **Karat Industry Co., Ltd.**

Address: No. 110 Baiyun Street, Dalian, Liaoning, China

Name: **Dalian Zhenghua Maoyi Youxian Gongsi**

AKA: Dalian Zenghua Trading Co., Ltd.

Address: Dalian, China

Name: **Tereal Industry and Trade Limited**

Address: No. 9 Hongji Street, Xi Gang District, Dalian City, China

2. 残りの7組織

<b>#459 Chengdu Latest Electronics Technology Company</b>
成都雷思特電子科技有限責任公司（簡体字表記 成都雷思特电子科技有限公司）
所在地 成都市郫县（县） 現代工業（现代工业） 港南区西源大道 2069 号
<a href="http://www.latest.com.cn/index.htm">http://www.latest.com.cn/index.htm</a>

<b>#466 Dalian Ligong Safety Equipment Company Limited</b>
大連理工安全裝備有限公司（簡体字表記 大连理工安全装备有限公司）
所在地 大連經濟技術開發区双 D 港河東路 26 号
<a href="http://www.duta.com.cn/index.asp">http://www.duta.com.cn/index.asp</a>

<b>#470 Fushun Jinly Petrochemical Carbon Co., Ltd.</b>
撫順金利石化炭素廠（簡体字表記 抚顺金利石化碳素厂）
所在地 撫順市東洲区石油二廠
<a href="http://fsjlshts.cn.china.cn/">http://fsjlshts.cn.china.cn/</a>

<b>#474 Liaoyang Carbon Co., Ltd.</b>
遼陽炭素有限公司（簡体字表記 辽阳碳素有限公司）
所在地 遼陽市（辽阳市） 劉（刘）二堡開發（开发）区劉（刘）鞍路 688 号
<a href="http://www.ly-carbon.cn/">http://www.ly-carbon.cn/</a>

<b>#481 Shanghai Hengtong Optics Technology Limited</b>
上海亨通光電科技有限公司（簡体字表記 上海亨通光电科技有限公司）
所在地 上海市閘北（闸北）区 江場（江场）西路 555 号
<a href="http://shhtgdgs.kuyibu.com/profile.html">http://shhtgdgs.kuyibu.com/profile.html</a>
（親会社 亨通集團の URL は <a href="http://www.hengtonggroup.com/#">http://www.hengtonggroup.com/#</a> ）

<b>#489 Weihai New Era Chemical Industrial Company Limited</b>
威海新元化工有限公司
所在地 威海市環翠（环翠）区 羊亭工業区（工业区） 鳳凰山（凤凰山）路 985 号
<a href="http://www.newerachem.cn/">http://www.newerachem.cn/</a>

<b>#492 Xinghe Xingyong Carbon Co. , Ltd.</b>
興和興永炭素有限公司（簡体字表記 兴和兴永碳素有限公司）
所在地 內蒙古自治区 烏蘭察布市（乌兰察布市） 興和县（兴和县）
<a href="http://xhxyts.cn.china.cn/">http://xhxyts.cn.china.cn/</a>