

# GEORGIAN DREAM'S ANTI-WESTERN POLICY: An opportunity for Iran

# HOW IRANIAN COMPANIES ARE USING GEORGIA TO BYPASS SANCTIONS



Tbilisi 2025

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The Georgian Dream's anti-Western foreign policy has contributed to the growing influence of regional authoritarian regimes over Georgia, including the Islamic Republic of Iran. In recent years, diplomatic, political, and economic cooperation between the Georgian Dream government and Iran has been steadily expanding.

This report, based on an analysis of publicly available sources, examines the deepening ties between the Georgian Dream and the Islamic Republic of Iran.

#### Breaking News - July 2, 2025

As this report was being finalized, Georgian Dream became embroiled in yet another scandal. Aleksandre Khvtisiashvili, Deputy Foreign Minister of Ivanishvili's regime, <u>attended</u> an event at the Iranian Embassy in Tbilisi commemorating the "martyrs killed in the Israeli regime's attack." According to a statement released by the Iranian Embassy, Khvtisiashvili signed the condolence book and expressed solidarity with the Islamic Republic. Shortly afterward, the Israeli Embassy issued an official <u>response</u>:



"We were dismayed to learn that Georgia's Deputy Foreign Minister attended a solidarity event at the Iranian embassy in Tbilisi. At a time when the West condemns Iran's attacks on Israeli civilians and supports efforts to stop its nuclear and genocidal ambitions, it is deeply disappointing to see the Deputy Foreign Minister taking part in such an event. This is morally wrong".

# INTENSIFICATION OF DIPLOMATIC TIES: IRAKLI KOBAKHIDZE'S OFFICIAL VISITS TO IRAN

In recent years, the Georgian Dream's anti-Western rhetoric has moved beyond mere public statements and evolved into active cooperation with authoritarian regimes. Notably, Georgian Dream Prime Minister Irakli Kobakhidze paid two official visits to Iran in 2024.



On May 22, 2024, Kobakhidze <u>attended</u> the funeral ceremony of Iranian President Ebrahim Raisi and Foreign Minister Hossein Amir-Abdollahian. Significantly, the ceremony was also attended by leaders of Hezbollah and Hamas. Later, on July 30, 2024, Kobakhidze <u>participated</u> in the inauguration of Iran's new president, Masoud Pezeshkian. During the inauguration, Kobakhidze was "honored" to appear in the same photo frame with former Hamas leader Ismail Haniyeh. As part of this second visit, he also held an official meeting with President Pezeshkian.

Photo description: Irakli Kobakhidze at the funeral of Ebrahim Raisi

According to the Iranian Embassy in Georgia, Kobakhidze <u>emphasized</u> the "high motivation" of both countries to deepen bilateral relations. In addition to political dialogue, the parties also discussed the importance of expanding economic cooperation.



"We are pleased that relations between our countries are progressing across various fields, and that public interaction and cooperation between the private sectors of Iran and Georgia are growing day by day."

[[

Photo description: Irakli Kobakhidze at a meeting with Pezeshkian, July 30, 2024

Despite heightened public interest (given that the most recent visit by a Georgian head of government to Iran took place on July 30, 2024), there is virtually no information available about the topics discussed, agreements reached, or specific joint projects planned during the bilateral meetings. The lack of transparency surrounding the visit, combined with the Georgian Dream's closed communication strategy, suggests that Mr. Kobakhidze and his associates are fully aware of how damaging such interactions are to Georgia's national interests. For this reason, they avoid public discussion of the content of these meetings. However, that did not stop them from publicly displaying photos taken against a backdrop of slogans such as "Death to Israel, Death to America."

# ECONOMIC COOPERATION BETWEEN GEORGIAN DREAM AND THE ISLAMIC REPUBLIC OF IRAN: IRANIAN OIL IN GEORGIA

Alongside deepening political cooperation, trade between Georgia and Iran has been steadily growing, albeit in a highly unbalanced manner. The trade relationship is marked by a negative trade balance for Georgia, as imports from Iran significantly exceed exports to Iran. For instance, in 2024, Georgia exported goods worth only 36 million USD to Iran, while imports from Iran reached 285 million USD, nearly eight times higher (see **Chart #1**).





Since 2020, the value of Iranian products imported into Georgia has increased substantially (see **Chart #2**).

In 2020, Iranian imports amounted to 45 million USD;

by 2024, this figure had nearly quintupled to 285 million USD.

In 2021 alone, imports of oil and petroleum products into Georgia rose by 154% compared to 2020, reaching 3,413 tons.



Chart #2: Growth in Imports from Iran ( Million USD \$ )

One of the primary categories of Iranian exports to Georgia is oil and petroleum products. Among imported Iranian products, petroleum coke, bitumen, and other residues from petroleum refining comprise the majority share (see **Chart #3**).





Since 2020, there has been a clear upward trend in the import of oil and petroleum products. In 2020, Georgia imported 683,000 USD worth of these goods from Iran; by 2024, that figure had nearly tripled to 2 million USD (see **Chart #4**).



Chart #4: Oil and Petroleum Product Imports from Iran, 2009–2024 (Million USD \$)







Photo 3

<sup>1.</sup> **Photos #1, #2, and #3** were taken on Georgian territory in May 2025. The images show Iranian trucks transporting petroleum products into Georgia.

According to Iranian <u>sources</u>, Georgia has become a significant export destination for various Iranian goods, including construction materials, petrochemicals, bitumen, and food products.

Given this data, it is important to note that the import of Iranian oil remains a persistent concern for the international community. The oil trade is one of the Islamic Republic's main sources of revenue. Therefore, the increasing volume of Iranian oil exports to Georgia raises serious concerns, as it may indicate indirect financial support for the Iranian regime.

The issue has not gone unnoticed at the highest levels. On May 1, 2025, U.S. President Donald Trump posted the following <u>message</u> on Truth Social:





It is also worth noting that numerous Iranian websites provide detailed guidance to Iranian businessmen on how to export petroleum and petrochemical products to Georgia. One such example is the <u>Sadra Tejarat Com-</u> pany, which offers consulting services and facilitates the transportation and export of petrochemical products to various countries, including Georgia.

photo description: Official website of Sadra Tejarat Company

A recurring recommendation found on these Iranian-language platforms is for potential exporters and businessmen to establish companies in Georgia. For instance, one Iranian <u>source</u> highlights several benefits of having a company in Georgia: Iranian citizens can access Georgia's free industrial zones, take advantage of tax incentives, and register companies without capital, in compliance with local regulations.



مشتقات نفتی از جمله کالاهای **صادرات از ایران به گرجستان** می باشد. برخی از محصولات کشاورزی نیز برای صادرات در نظر گرفته شده اند ،که در کشور گرجستان از طرفداران خاصی برخوردار خواهند بود. مصالح ساختمانی و همچنین برخی از لوازم های خانگی نیز از جمله محصولات صادراتی از ایران به مقصد گرجستان بوده اند. **شرایط صادرات از ایران به گرجستان** هر تجارتی در جهان منوط به رعایت برخی از مقررات می باشد. مقررات زیادی نیز برای این نوع از صادرات در نظر گرفته شده است. اگر شما به دنبال تجارت با کشور گرفته شده است. به شنهاد می کنیم در درجه ی اول در کشور گرجستان خصوصا در نواحی بندری آن ، اقدام به ثبت شرکت کنید. شما از این طریق می توانید تجارت بسیار آسانی را تجربه نمایید.

ا عمل ثبت شرکت شما می توانید در هزینه ها صرفه جویی چشم گیری را اعمال کنید . همچنین یک راه حل بسیار آسان برای سهولت در صادرات و واردات خواهد بود. برای ثبت شرکت

For instance, the official website of <u>Arad Brand-ing</u> features an article on Iran-Georgia trade relations, emphasizing the advantages of doing business in Georgia:

"Any kind of trade in the world relies on following certain rules. For this type of export, there are many regulations. If you plan to trade with Georgia, we recommend that you first register companies in Georgia, especially near ports. This way, you can trade more easily. Registering a company can also significantly reduce costs. Additionally, it will make exports and imports smoother." (Source 1)

، کشور ، شما می توانید از طریق برخی وزارت خانه ها از جمله وزارت توسعه اقتصاد اقدام نمایید.

This is just one example among many. Iranian online platforms frequently share advice and personal experiences, encouraging Iranian companies to use Georgian territory for business initiatives, many of which are designed to circumvent international sanctions through questionable or outright fraudulent schemes.

# HOW IRANIAN COMPANIES ARE USING GEORGIA TO BYPASS SANCTIONS

Iran, currently under extensive international sanctions, continues to find ways to export oil and other products to the global market through various schemes. In this context, the Islamic Republic has a strong motivation to deepen its cooperation with Georgia.

#### By leveraging Georgian territory and companies registered in Georgia, Tehran is able to access not only Russian and Chinese markets but also Western ones.

Considering the recent intensification of Georgian-Iranian cooperation, it is reasonable to conclude that Iran is increasingly using Georgia as a corridor to circumvent international sanctions. This assumption is supported by both statistical data and evidence gathered by the Civic IDEA research team.

Between 2013 and 2024, Iranian citizens <u>registered</u> approximately 9,300 companies in Georgia. According to the National Statistics Office of Georgia, 382 Iranian companies were registered in 2024 alone, an increase of around 150% compared to 2020 figures (see **Table #5**).

Legal form of the organization	2020	2021	2022	2023	2024	2025 (By May 1)
In total	253	241	459	466	382	85
Limited Liability Company	228	188	360	298	175	41
General Proprietorship Company	1	0	0	0	0	0
Individual Entrepreuner	22	50	98	168	205	43
Non-entrepreneurial Non-commercial Legal Entity	2	3	1	0	1	1

 Table #5: Iranian Companies Registered in Georgia (2020–2025)

Numerous Iranian blogs and articles portray Georgia as a favorable destination for launching business initiatives, especially due to its strategic role as a regional transit hub. These sources also <u>highlight</u> the ease of obtaining the necessary licenses for exporting goods into and through Georgia.

Civic IDEA's research identified several Iranian-language articles that openly detail how Iranian businessmen circumvent international sanctions through fraudulent schemes. These sources often <u>emphasize</u> Georgia's free trade agreements with multiple countries, including the European Union, as well as its access to the U.S. market under the Generalized System of Preferences (GSP). According to these articles, Iranian companies can <u>import</u> products into Georgia, repackage them as Georgian-made goods, and then export them to European or U.S. markets without paying customs tariffs.



"With the adoption of a law on Georgia's integration into the EU and the abolition of customs tariffs for Georgian products exported to Europe, a favorable environment was created for Iranian traders: they can bring their products into Georgia and, by repackaging them with a label of Georgian products, export them to the EU or the US without paying customs tariffs and at a competitive price." (Source 2)

"Indeed, Iran can circumvent U.S.-imposed restrictions and sanctions and access global markets for various products by trading through Georgia. Iran's broader objective appears to be positioning trade with Georgia as a central route for both its exports and imports. The strong trade, economic, cultural, and touristic ties between Iran and Georgia suggest a promising future for bilateral relations. One of Georgia's key advantages, as a potential gateway for Iran to the global market, is its extensive network of trade agreements, particularly with Europe. For



Georgia, trade with European countries is both accessible and profitable. These agreements enable Georgia to engage in tariff-free trade not only with EU member states but also with a range of non-EU countries. For instance, Georgia's free trade agreements with the EU, Turkey, Russia, Kazakhstan, and others allow it to export goods to these markets without paying customs duties." (Source 3)

The possibility of accessing the EU market through Georgia has been acknowledged by Iranian officials in formal settings, often in the presence of representatives of the Georgian Dream government. For example, during the sixth meeting of the Iran– Georgia Joint Economic Commission in 2017, Iran's Minister of Cooperatives, Labor, and Social Welfare, Ali Rabiei, <u>stated</u>:

Given Georgia's relations with the European Union, Georgia is the most suitable route for exporting Iranian goods to Europe."

# **SANCTIONED GEORGIAN COMPANIES**

Due to the use of fraudulent schemes to evade international sanctions, Iranian companies are periodically added to global sanctions lists. Iranian-owned or affiliated companies registered in Georgia have not been an exception and have appeared on such lists multiple times.

#### 2014: U.S. DEPARTMENT OF THE TREASURY SANCTIONS

In 2014, the U.S. Treasury Department imposed sanctions on a number of individuals and entities for violating sanctions on Iran, facilitating its nuclear and missile proliferation, and supporting terrorism.

Sanctioned individuals:

- Pourya Nayebi
- Houshang Hosseinpour
- Houshang Farsoudeh

These individuals had established several companies in Georgia, which were subsequently sanctioned:

- Caucasus Energy
- Georgian Business Development
- Great Business Deals
- New York Money Exchange

In 2011, these individuals <u>acquired</u> a 70% stake in the licensed Georgian financial institution InvestBank. The bank was later used to conduct financial transactions totaling approximately 8 million USD with Iranian banks, including Bank Melli, Mir Business Bank, Bank Saderat, and Bank Tejarat.

#### 2019: U.S. BUREAU OF INDUSTRY AND SECURITY SANCTIONS

In 2019, the Bureau of Industry and Security (BIS) added several organizations to the Entity List for unlawfully attempting to procure and divert export-controlled aluminum tubing to Iran.

The sanctioned companies included the entity registered in Georgia and operated by Iranian businessmen, Georgia Petrochemical Aviatech.

#### 2021: U.S. DEPARTMENT OF COMMERCE SANCTIONS

In 2021, the U.S. Department of Commerce sanctioned 37 entities deemed to be acting contrary to U.S. foreign policy and national security interests. These companies were involved in supplying or attempting to supply U.S.-origin items that could materially support Iran's conventional weapons and missile programs. Among the sanctioned entities were the following companies registered in Georgia:

- ROV Solutions
- SAEROS Safety ERO Company
- Gensis Engineering

Company profiles and connections:

Registered in Georgia in 2012, ROV Solutions had its legal address at Pl. Ioseliani Avenue No. 2. As of April 23, 2025, the company's registration is listed as <u>canceled</u> in the Registry of Entrepreneurs and Non-Entrepreneurial (Non-Commercial) Legal Entities. The sole director and 100% shareholder of the company was Levan Kotiashvili.

This company was registered in Georgia in 2013. According to the registry, its status was <u>canceled</u> as of April 23, 2025. According to a 2017 <u>extract</u> from the Public Registry, its director was Irakli Kotiashvili, and the 100 % shareholder was Nino Julakidze.

It is worth noting that Irakli Kotiashvili is the son of Levan Kotiashvili, while Nino Julakidze is his wife, suggesting strong family ties among the directors of the sanctioned companies.

#### **ROV Solutions**

#### SAEROS Safety ERO Company

Although the company cannot be found in Georgia's online public registry, according to the U.S. Department of Commerce, Gensis Engineering is <u>registered</u> in both Georgia and Turkey. Its Georgian branch is also listed at Pl. Ioseliani Avenue No. 2, Flat 6 - the same address used by both ROV Solutions and SAEROS Safety ERO Company. This strongly suggests that the three companies are part of a coordinated network or scheme.

Gensis Engineering

Following the imposition of sanctions by the U.S. Department of Commerce, Levan Kotiashvili acknowledged in an <u>interview</u> that he had an Iranian business partner named Gochin, who allegedly ran a tourist agency in Georgia. However, Kotiashvili claimed that Gochin's name does not appear in any of the companies' official registration documents.

When asked whether illegal activities were carried out through these companies, Kotiashvili <u>responded</u> ambiguously: "Maybe, maybe, if they produced or did something without me with these companies — I don't know."

### **GEORGIAN ENTITIES AND INDIVIDUALS CONNECTED TO IRAN**

Over the past two decades, numerous instances have emerged in which individuals with ties to Iran have used Georgian territory to conduct activities that serve the interests of the Islamic Republic.

In April 2024, WikiIran<sup>2</sup> <u>published</u> information identifying four Georgian companies allegedly involved in facilitating the sale of Iranian crude oil. According to the source, these companies have repeatedly purchased oil from Iran's Ministry of Defense and Armed Forces Logistics (MODAFL).

"These companies are managed, owned, and affiliated with Iranian nationals—possibly even with MODAFL itself." – WikiIran.

The suspected ties between these Georgia-based companies and Tehran are not surprising, given that several of their directors and/or shareholders are Iranian citizens.

<sup>2.</sup> WikiIran is a community of Iranian expatriate professionals dedicated to exposing the Islamic Republic of Iran's violations of international law and regulations. Its primary goal is to increase international pressure on the Iranian regime. The organization gathers information through open-source research as well as through cooperation with allied organizations and individuals.

Below, we present detailed information about these Georgian companies:

### GHATRAN PETROLEUM LLC (Registration Number: 400052802)

The company, allegedly connected to MODAFL, was registered in Georgia in 2012. According to an <u>extract</u> from the Public Registry, the company's director is Seyedjavad Mousavi, and its shareholders include Georgian citizens Davit Shoshitashvili (5%) and Tamaz Chaduneli (5%), as well as Iranian citizens Seyedjavad Mousavi (80%) and Seyedamirhosein Mousavi (10%).

According to <u>WikiIran</u>, GHATRAN PETROLEUM LLC is linked to the Iranian company GHATRAN KAVEH OIL PETROLEUM, a producer and exporter of refined petroleum products. Although a direct connection between the Georgian company and MODAFL has not been officially confirmed, WikiIran reports that GHATRAN PETROLEUM has a contract with Sahara Thunder<sup>3</sup>, a sanctioned Iranian entity.

Moreover, the shareholders of GHATRAN PETROLEUM have registered several other companies in Georgia. Their connections to Iranian businessmen and businesses raise reasonable suspicion that these Georgian entities may also be involved in fraudulent schemes that benefit the Islamic Republic.

Below, we present a list of Georgian companies established by the Georgian shareholders of GHATRAN PETROLEUM, some of which appear to have ties to arms contraband activities.

One of the shareholders of GHATRAN PETROLEUM LLC (holding 5% of the shares), Davit Shoshitashvili, is associated with four Georgian-registered companies:

1. Ltd Data (R/N: 204960088; registered on March 30, 2001)

2. Ltd Kartuli Pabi (R/N: 405145105; registered on April 13, 2016)

3. Ltd Innovative Energy Efficient Technologies Manufacturing Company (R/N: 406293201; registered on October 25, 2019)

4. Ltd Economic Management Development and Assistance Fund (R/N: 400018413; registered on March 28, 2011)

<sup>3.</sup> Sahara Thunder is a company operating under Iran's Ministry of Defense and Armed Forces Logistics. According to the U.S. Department of the Treasury, the company plays a key role in the production and supply of Iranian drones to Russia. Additionally, Sahara Thunder manages a network used to facilitate the export of Iranian goods to China, Russia, and Venezuela.

A particularly noteworthy detail concerns the shareholders of Ltd Economic Management Development and Assistance Fund. **Among them is Givi Bakhtadze (8.75%)**, **the father of former Georgian Prime Minister Mamuka Bakhtadze**.<sup>4</sup>

It is worth recalling that during his tenure as Prime Minister, Mamuka Bakhtadze held several meetings with representatives of the Islamic Republic of Iran to promote bilateral cooperation. For instance, in 2017, he <u>met</u> with Iran's Minister of Transport and Urban Development, Abbas Akhundi, to discuss the "effective usage" of the Trans-Caspian International Transport Corridor.

In this context, the business partnership between Davit Shoshitashvili, a known associate of Iranian nationals, and Givi Bakhtadze raises reasonable suspicion that Georgia's cooperation with Iran under Mamuka Bakhtadze's leadership may have extended beyond official diplomatic engagements and could have involved concealed business interests.



Photo Description: <u>Declaration</u> on Property State of Mamuka Bakhtadze, 2016.

	სუბიექტი			
საფირმო სახელწოდება:	შპს ეკონომიკური მართვის განვითარების და დახმარების ფონდი	30/000060	Forme	
სამართლებრივი ფორმა:	შეზღუდული პასუხისმგებლობის საზოგადოება	მესაკუთრე	წილი	
საიდენტიფიკაციო ნომერი:	400018413	01021000618, რამაზ 69,75000		
რეგისტრაციის ნომერი, თარიღი:	28/03/2011	გოგისვანიძე		
მარეგისტრირებელი ორგანო:	სსიპ საჯარო რეესტრის ეროვნული სააგენტო	01006011575, გივი ბახტად	ງ 8.75000000%	
იურიდიული მისამართი:	საქართველო, თბილისი, გლდანი-ნაძალადევის რაიონი, დეპოს ქ., № 24	01024029673, ბონდო		
დამატებითი ინფორმაცია:		ფირანიშვილი	7.500000009	
სხვა მისამართი:	საქართველო, გარდაბანი, სადგური ველი, სოფელი გაჩიანი	5		
ელ. ფოსტა:	georgianbitumen@yahoo.com			
დამატებითი ინფორმაციის ნამდვილობაზე პას	უხისმგებელია ინფორმაციის მომწოდებელი პირი.	64№2091498, , , დავით	10 0000000000	
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Photo Description: The Extract from the Public Registry

<sup>4.</sup> Mamuka Bakhtadze served as Georgia's Minister of Finance from 2017 to 2018, and as Prime Minister from 2018 to 2019.

Tamaz Chaduneli<sup>5</sup>, a 5% shareholder of GHATRAN PETROLEUM LLC, is associated with at least eight Georgian-registered companies:

1. **Ltd Trans-vei** (R/N: 404864820; registered on June 14, 2010; Chaduneli is the company's director and holds 25% of the shares). The majority shareholder of the company is Boris Mchedlidze (51%), while Davit Chutkerashvili holds 24%. According to publicly available sources, Davit Chutkerashvili has been <u>involved</u> in the delivery of arms to various groups operating in conflict zones, including in Africa and Afghanistan.

2. Ltd Arji (R/N: 443857300; registered on July 8, 2013; Chaduneli owns 40% of the company, and the remaining 60% is owned by Vreji Ohanian, a citizen of Armenia).

3. Ltd D.M.D.T Holding (R/N: 443867273; registered on February 15, 2019; Chaduneli serves as both director and 50% shareholder and the remaining 50% is held by Dalibor Kopp, a citizen of the Czech Republic (ID: 610804/1775, 45214031), who is further discussed in the next chapter).

4. Ltd Triniti (R/N: 406304306; registered on March 10, 2020; Chaduneli is listed as both director and 50% shareholder).

5. Ltd M.T.D Holding (R/N: 443870535; registered on May 14, 2021; Chaduneli is the sole shareholder (100%)).

6. **Ltd Georgian Commerce Invest and Logistics** (R/N: 402220486; registered on May 30, 2022; Chaduneli holds 75% of the shares. The remaining 25% is owned by a foreign citizen, Sami Youssef Maatouk).

7. Ltd R. Baltic. Corporation (R/N: 443872506; registered on September 14, 2022; Chaduneli holds a 10% share; Bila Vidmanta, a Lithuanian citizen, owns the remaining 90%).

8. Ltd Galerea Gvirabi (R/N: 202201786; registered on October 18, 2002; As of 2025, its shareholders <u>include</u>: Ivane Martiashvili (59%), Davit Panjakidze (25%), Giorgi Khmaladze (12.5%), and Nikoloz Khmaladze (12.5%)).

Notably, according to registry <u>data</u> from 2018, the company previously operated under the name "Ltd Kavkasioni-Iberia", with Tamaz Chaduneli listed as its director. At that time, the company's shareholders included: Vakhtang Gvaramia (former member of Georgia's Constitutional Court), Vakhtang Kutateladze (Minister of State Security of Georgia, 1998–2001), and Evgeni Kharbedia.

<sup>5.</sup> In the 2020 parliamentary elections, Tamaz Chaduneli was <u>nominated</u> as a majoritarian candidate for Khashuri and Kareli by Tamaz Mechiauri's party, "Tamaz Mechiauri for United Georgia".

Information circulated in Georgian media suggests these individuals may have abused their positions. In 2002, the outlet "Kviris Palitra" published an article detailing potential secret deals between Georgian state agencies and arms traders. The article reported that the company "Ltd Kavkasioni," co-founded by Valeri Konjaria and Evgeni Kharbedia, obtained a license to import and sell arms with the assistance of then-Deputy Minister of Justice, Vakhtang Gvaramia. It further stated that both Gvaramia and Kutateladze lobbied for the company's interests and, in return, received 25% each of the profits from arms sales.

The partnership between individuals with similar backgrounds and Tamaz Chaduneli reinforces suspicions that, beyond his cooperation with Iranian companies, Chaduneli may also be connected to figures involved in arms smuggling. These concerns are further exacerbated by his business relationship with Dalibor Kopp, a Czech citizen who has been formally charged with participating in arms trafficking.



### WHO IS TAMAZ CHADUNELI'S BUSINESS PARTNER, DALIBOR KOPP?

"Civil IDEA" has identified, based on an extract from the public registry, that one of the directors and shareholders of Tamaz Chaduneli's company, Ltd D.M.D.T., is a Czech citizen, Dalibor Kopp, whose identification document is listed in the same extract.

Publicly available sources indicate that Dalibor Kopp has been linked to multiple scandals:

In 1995, he was reportedly involved in arms smuggling, having <u>established</u> ties with the Palestinian extremist group Hamas, with whom he negotiated the supply of 25,000 submachine guns and 12 million rounds of ammunition.

That same year, Kopp <u>negotiated</u> with Arab traders to export arms to the Middle East. To conceal the deal, a Yemeni-based company purchased ammunition from him, which was then resold to Iraq.

He was also <u>accused</u> of importing marijuana along with thousands of pistols and machine guns from Kazakhstan.

In 2004, Kopp was <u>suspected</u> of supplying weapons to militant groups in Iraq, including Islamist terrorist organisations, as well as transporting arms to Liberia. He was charged in the Czech Republic, where investigators found that his company was illegally involved in the production and import of ammunition. However, he fled the country before the investigation concluded, prompting the Czech authorities to issue an international arrest warrant.

In December 2004, at Interpol's request, Dalibor Kopp was <u>arrested</u> by military representatives of the United Nations Mission in Liberia and handed over to Liberian authorities. However, with the assistance of a Liberian official, he escaped from custody just hours before Interpol officers arrived.

On 8 June 2005, the Czech Republic filed a <u>request</u> for legal assistance with the US Federal Court concerning Dalibor Kopp, Josef Ondrouch, Dana Lee Reed, ASC International, Kopp Arms, and Spetstechnoexport.

In 2008, the Brno Regional Court <u>sentenced</u> Dalibor Kopp to four years and nine months in prison for illegal arms trafficking committed between 1998 and 2004.

After his arrest, a spokeswoman for the Czech police stated:

"They sent arms to Africa, the Middle East, Iraq, Iran, and Israel."



The second company, which, according to <u>WikiIran</u>, is suspected of having suspicious connections to MODAFL, is the Georgian-registered company Razi Oil Refinery LLC. According to an <u>extract</u> from 2017, the company was registered on October 13, 2017. Since then, no other extract about the company has been found in the Public Registry. The company's director and 100% owner of the shares is Iranian citizen Mehrdad Beikpour.

The official website of the Iranian oil company Razi Oil Refinery indicates that Razi Oil Refinery LLC, registered in Georgia, is its subsidiary.



Photo Description<sup>6</sup>:

"Georgia Office Representative Georgia Office Director: Mr. Mehrdad Beikpour Georgia Office Address: Georgia, Tbilisi, Nutsubidze Street No. 193 Georgia Office Phone Number: 00995 322 319 931 Georgia Mobile Number: 00995 557 547 036 Georgia management@razi-refinery.com Georgia Office Registration Number (Razi LLC): 439408687"

### Blu Oil Company (R/N: 406251764)

The third company allegedly <u>linked</u> to MODAFL is Blu Oil Company LLC, which was registered in Georgia on July 16, 2018, according to an <u>extract</u> from that year. The company's director and sole shareholder is a Georgian citizen, Dodo Chaligava. Since 2018, no additional extracts about the company have been found in the Public Registry.

*Photo Description: The Public Registry website indicates that in 2018, an Iranian citizen, Amir Forozandehsamani<sup>7</sup>, submitted a request to obtain the company's extract.* 

	საქართველოს იუსტიციის სამინისტრო საჭარო რეესტრის ეროვნული სააგენტო
გა	დაწყვეტილება # B18076471/3 ( 17/07/2018 17:47:31)
	რეგისტრაციის შესახებ
განმცხადებელი: <mark>ამირ ფორ</mark>	ო სააკენტოს მიერ მიღებულ იქნა განცხადება # <b>B18076471</b> 17/07/2018 14:39:36 ( <b>უვნანდეპსამანი</b> /01291023348/ ), რომლითაც მოთხოვნილია ამონანერის მომნადება კო იქრიდიულ პირთა რევსტრიდან.
სამართლებრივი ფორმა: <b>შე</b> დასახელება: <b>შპს ბლუ ოილ</b> საიდენტიფიკაციო კოდი: <b>40</b>	მღუდული პასუხისმგებლობის სამოგადოება ქომფანი 5251764
საჭარო რეესტრის შესახებ დაკმაყოფილების თაობაზე.	საქართველოს კანონის შესაბამისად, მიღებულ იქნა გადაწყვეტილება მოთხოვნი
გადაწყვეტილება ძალაში შე	დის გამოქვეყნებისთანავე.
გადაწყვეტილება გამოქვიცნ	ებიდან 30 კალენდარული დღის ვადაში შეიძლება გასაჩივრდეს სასამართლოს წესით.

<sup>6.</sup> The photo was taken from the official website of the Iranian company Razi Oil Refinery.

<sup>7.</sup> Forouzandehsamani founded a company in Georgia, SARA CARPET LLC (R/N: 430802679). Forouzandehsamani owns 50% of the company's shares, while Sayedmohsen Sanaye owns 50%.

According to information obtained by <u>WikiIran</u>, Blu Oil Company LLC acts as an intermediary for Sahara Thunder, a company under Iran's Ministry of Defense, facilitating the export of Iranian oil to China. In correspondence between Sahara Thunder and Blu Oil, Sahara Thunder openly described a method to conceal the Iranian origin of the oil: oil from three Iranian vessels (<u>Argo, Global Beauty, Harmony<sup>8</sup></u>) was transferred to a ship called <u>Dune<sup>9</sup></u>, and subsequently transported by another ship, <u>Cathay</u> <u>Phoenix<sup>10</sup></u>. This process effectively obscured the Iranian origin of the oil before its export to China.

The company's director and 100% owner, Dodo Chaligava, is associated with six other Georgian companies:

1. Ltd Evroturizmi (R/N: 428884950; registered on October 31, 2018; director and 50% shareholder: Dodo Chaligava).

2. Ltd Harat Petro (R/N: 404561602; registered on July 27, 2018; director and 100% shareholder: Dodo Chaligava).

3. Ltd Pasko Company (R/N: 428884479; registered on July 25, 2018; director and 100% shareholder: Dodo Chaligava).

4. Ltd Afghan Oil (R/N: 406253058; registered on July 27, 2018; director and 100% shareholder: Dodo Chaligava).

5. Ltd Athena (R/N: 422433637; registered on October 21, 2021; director and 100% shareholder: Dodo Chaligava).

6. Ltd Setare (R/N: 422441478; registered on November 22, 2023; director and 100% shareholder: Dodo Chaligava).

The simultaneous registration of four companies by Chaligava in July 2018 raises suspicions. Concerns are further heightened by the fact that several of these companies have names of Iranian origin (e.g., Harat Petro, Afghan Oil). Notably, Ltd Setare, founded in 2023, also has an Iranian name; Setare is a Persian word meaning "star."

It is also noteworthy that, according to an Iranian-language source, Dodo Chaligava studied at the Department of Iranian Studies at Tbilisi State University. In 2016, he reportedly visited Iran as part of a delegation representing 41 countries and met with the head of Iran's Organization for Cultural and Islamic Relations.

<sup>8.</sup> Each of the vessels are sanctioned by the US.

<sup>9.</sup> Sanctioned by the US.

<sup>10.</sup> Sanctioned by the US.

Photo Description: A photo of Dodo Chaligava is published on an Iranian website.



#### Engine Oil Refinery LLC (R/N: 406367934)

The fourth company with suspected <u>ties</u> to MODAFL is Engine Oil Refinery LLC. According to an <u>extract</u> from 2022, the company was registered in Georgia on June 17, 2022. Since then, no additional extracts about the company have been found in the Register of Entrepreneurs and Non-Entrepreneurial Legal Entities. The company's director and sole shareholder is Iranian citizen Hossein Baktashi. According to information disseminated by <u>WikiIran</u>, Engine Oil Refinery LLC is involved in a suspicious scheme to sell Iranian oil.

It is noteworthy that WikiIran's reporting so far has covered only the connections of these four Georgian companies with Iran. However, given the dynamics of Georgian-Iranian relations in recent years, other individuals or organisations linked to Iranian citizens or Iranian government agencies may have also operated in the Georgian market.

#### **KEY TAKEWAY !**

Civic IDEA's research identified several Iranian-language articles that openly detail how Iranian businessmen circumvent international sanctions through fraudulent schemes. These sources often emphasize Georgia's free trade agreements with multiple countries, including the European Union, as well as its access to the U.S. market under the Generalized System of Preferences (GSP). According to these articles, Iranian companies can import products into Georgia, repackage them as Georgian-made goods, and then export them to European or U.S. markets without paying customs tariffs.

### THE PARADOX OF GEORGIAN DREAM'S FOREIGN POLICY:

### PARTNERSHIP WITH THE ISLAMIC REPUBLIC OF IRAN AMIDST THE RESET OF RELATIONS WITH THE UNITED STATES

Among the populist promises made by representatives of Georgian Dream is the <u>pledge</u> to "reset" relations with Washington. However, this raises a critical question: how does the ruling party intend to open a "new chapter" in relations with the Trump administration while simultaneously maintaining active diplomatic and economic ties with a state that is openly hostile to the United States?

As outlined in this report, the relationship between Georgian Dream and the Islamic Republic of Iran extends beyond mere diplomacy and includes robust trade cooperation. In recent years, Georgia has significantly increased its imports of oil products from Iran. In 2024 alone, approximately \$2 million worth of oil and oil products entered Georgia, marking a notable rise compared to previous years.

Moreover, the number of companies established by Iranian citizens in Georgia has been steadily increasing. On Iranian online platforms, including blogs and consulting websites, Iranian individuals and companies openly describe how Georgia can be used as a conduit to circumvent international sanctions. This report highlights only a fraction of the Georgian companies that, according to one source, are alleged to cooperate with Iran's Ministry of Defense and Armed Forces Logistics.

The exploitation of Georgian territory by Iranian businessmen for illicit schemes is not a new phenomenon. Over the past decade, the United States has sanctioned several Georgian-registered companies for these very reasons. However, recent intensified diplomatic engagement between Iran and Georgian Dream appears to have created a more accommodating environment for individuals and organizations aligned with the foreign policy interests of the Islamic Republic.

Notably, Civic IDEA has identified several cases during the course of this research that point to connections between Iranian-founded companies in Georgia and citizens of Georgia and other countries involved in arms smuggling. For instance, Tamaz Chaduneli, a business associate of Iranian nationals, has ties to Dalibor Kopp, a Czech citizen previously involved in supplying weapons to Hamas and other terrorist groups. Such cases underscore the increasing opacity of Georgia's business environment and its growing susceptibility to criminal activity.