



Council of the  
European Union

Brussels, 17 June 2025  
(OR. en)

9696/25

LIMITE

CORLX 530  
CFSP/PESC 805  
RELEX 688  
COHOM 88

## LEGISLATIVE ACTS AND OTHER INSTRUMENTS

---

Subject: COUNCIL IMPLEMENTING REGULATION implementing Regulation (EU) 2020/1998 concerning restrictive measures against serious human rights violations and abuses

---

**COUNCIL IMPLEMENTING REGULATION (EU) 2025/...**

**of ...**

**implementing Regulation (EU) 2020/1998 concerning restrictive measures  
against serious human rights violations and abuses**

THE COUNCIL OF THE EUROPEAN UNION,

Having regard to the Treaty on the Functioning of the European Union,

Having regard to Council Regulation (EU) 2020/1998 of 7 December 2020 concerning restrictive measures against serious human rights violations and abuses<sup>1</sup>, and in particular Article 14(1) thereof,

Having regard to the proposal from the High Representative of the Union for Foreign Affairs and Security Policy,

---

<sup>1</sup> OJ L 410 I, 7.12.2020, p. 1, ELI: <http://data.europa.eu/eli/reg/2020/1998/oj>.

Whereas:

- (1) On 7 December 2020, the Council adopted Regulation (EU) 2020/1998.
- (2) On 8 December 2020, by way of the Declaration by the High Representative of the Union for Foreign Affairs and Security Policy (the ‘High Representative’), on behalf of the European Union, regarding the EU Global Human Rights Sanctions Regime, the Union and its Member States reaffirmed their strong commitment to the promotion and protection of human rights around the world. The EU Global Human Rights Sanctions Regime underscores the Union’s determination to enhance its role in addressing serious human rights violations and abuses worldwide. Realising the effective enjoyment of human rights for every person is a strategic goal of the Union. Respect for human dignity, freedom, democracy, equality, the rule of law and human rights is a fundamental value of the Union and its common foreign and security policy.
- (3) The Union is concerned about transnational repression by Iranian state bodies through the ongoing use of proxy agents, in particular involving criminals and organised crime networks targeting dissidents and human rights defenders across the world, including on Union territory. Those criminals and organised criminal networks have been responsible for serious human rights violations or abuses such as extrajudicial, summary and arbitrary killings as well as enforced disappearances of persons critical of the actions or policies of the Islamic Republic of Iran, or of persons deemed to be opponents of the Islamic Republic of Iran.

- (4) In that context, eight persons and one entity should be added to the list of natural and legal persons, entities and bodies set out in Annex I to Regulation (EU) 2020/1998.
- (5) Regulation (EU) 2020/1998 should therefore be amended accordingly,

HAS ADOPTED THIS REGULATION:

*Article 1*

Annex I to Council Regulation (EU) 2020/1998 is amended in accordance with the Annex to this Regulation.

*Article 2*

This Regulation shall enter into force on the date of its publication in the *Official Journal of the European Union*.

This Regulation shall be binding in its entirety and directly applicable in all Member States.

Done at ..., ...

*For the Council*

*The President*

\_\_\_\_\_

## ANNEX

Annex I to Regulation (EU) 2020/1998 is amended as follows:

(1) the following entries are added to the list of natural or legal persons, entities or bodies under heading ‘A. Natural persons’:

	Names (Transliteration into Latin script)	Names	Identifying information	Reasons for listing	Date of listing
‘126.	Naji Ibrahim SHARIFI-ZINDASHTI a.k.a. KENANI, Emirhan SERIFI ZINDASTI, Naci SERIFI-ZINDASTI, Naci SHARIFI ZINDASHTI, Naji SHARIFI-ZINDASHTI, Naji	ناجی ابراهیم شریفی زیندشتی (Persian spelling)	DOB:31.5.1974 POB: Zindasht or Orumiyeh, Iran Nationality: Iranian Gender: male ID: 2753229112 Associated entity: Zindashti Network	Naji Sharifi-Zindashti is an Iranian narcotics trafficker and organised crime boss. He is the leader of the Zindashti Network, a criminal group that has carried out numerous acts of transnational repression, including assassinations outside of Iran.  He is connected to the Iranian Ministry of Intelligence and Security (MOIS), which is the branch of the Iranian government tasked inter alia with assassinating persons critical of the actions or policies of the Islamic Republic of Iran, or persons otherwise deemed to be opponents of the Islamic Republic of Iran by the Islamic Republic of Iran.  Therefore, Naji Sharifi-Zindashti is responsible for serious human rights violations or abuses outside of Iran, in particular extrajudicial, summary or arbitrary executions and killings and enforced disappearance of persons.	+

+ OJ: please insert the date of entry into force of this implementing Regulation.

	Names (Transliteration into Latin script)	Names	Identifying information	Reasons for listing	Date of listing
127.	Abdolvahap KOCAK a.k.a. Abdolwahab KOCAK Abdolvahab KUCHAK		POB: Adiyaman, Türkiye Nationality: Turkish Gender: male ID: UI2429867	<p>Abdolvahap Kocak is officially Naji Zindashti's gardener. He also served as an assassin who has been implicated in multiple killings ordered by Naji Zindashti and executed by the Zindashti Network.</p> <p>In particular, Abdolvahap Kocak assassinated the Iranian dissident Mas'ud Molavi Vardanjani, a crime for which he was convicted in Türkiye.</p> <p>Therefore, Abdolvahap Kocak is associated with Naji Zindashti and the Zindashti Network that are responsible for serious human rights violations or abuses, including extrajudicial, summary or arbitrary killings. He is also responsible for serious human rights violations or abuses outside of Iran, in particular extrajudicial, summary or arbitrary killings.</p>	+

+ OJ: please insert the date of entry into force of this implementing Regulation.

	Names (Transliteration into Latin script)	Names	Identifying information	Reasons for listing	Date of listing
128.	Ali ESFANJANI	علی اسفنجانی (Persian spelling)	DOB: 15.8.1985 Nationality: Iranian Gender: male ID: P30251288	As part of a plot by the Iranian Ministry of Intelligence and Security (MOIS) and the Zindasthi Network, Ali Esfanjani befriended Iranian dissident Mas'ud Molavi Vardanjani, fed the MOIS information about him and led him to the place where he was killed by Abdulvahap Kocak.  As such, Ali Esfanjani is associated with Naji Zindashti and the Zindashti Network that are responsible for serious human rights violations or abuses, including extrajudicial, summary or arbitrary killings. He is also directly involved in an extrajudicial, summary or arbitrary killing by assisting in, preparing or facilitating that killing.	+

+ OJ: please insert the date of entry into force of this implementing Regulation.



	Names (Transliteration into Latin script)	Names	Identifying information	Reasons for listing	Date of listing
129.	Ali KOCAK		<p>POB: Adiyaman Kahta, Türkiye</p> <p>Nationality: Iranian</p> <p>Gender: male</p> <p>ID: 20926131442</p>	<p>Ali Kocak is Abdulvahap Kocak's brother and an associate of the Zindashti Network. Ali Kocak conducted surveillance on Iranian Gem TV owner, Saeed Karimian, prior to his killing and is suspected of being responsible for the killing itself.</p> <p>Therefore, Ali Kocak is involved in serious human rights violations or abuses, by assisting in, preparing and facilitating extrajudicial, summary or arbitrary killings.</p> <p>Furthermore, Ali Kocak is formally Naji Zindashti's driver. Ali Kocak is therefore associated with Naji Zindashti and the Zindashti Network that are responsible for serious human rights violations or abuses, including extrajudicial, summary or arbitrary killings.</p>	+

+ OJ: please insert the date of entry into force of this implementing Regulation.

	Names (Transliteration into Latin script)	Names	Identifying information	Reasons for listing	Date of listing
130.	Ekrem Abdulkerym OZTUNC a.k.a. Ekrem ÖZTUNÇ		DOB: 7.10.1984 POB: Yüksekova, Türkiye Nationality: Turkish Gender: male Address: Orumiyeh, West Azerbaijan, Iran ID: U01292672	Ekrem Oztunc is a nephew of Naji Zindashti and a close Zindashti Network associate. He has played a pivotal role in relaying, through encrypted channels, the orders to kill during the Network's assassination attempts. As such, Ekrem Oztunc is associated with Naji Zindashti and the Zindashti Network, as well as responsible for planning, ordering, assisting in or facilitating extrajudicial, summary or arbitrary executions and killings and enforced disappearance of persons, which constitute serious human rights violations or abuses.	+
131.	Mohammed Reza ANSARI		Nationality: Iranian Gender: male	Mohammed Ansari is the leader of the Islamic Revolutionary Guard Corps (IRGC) Quds Force Unit 840. He ordered the assassination of journalists critical of the Iranian regime, including two journalists of Iran International. Mohammed Ansari is therefore responsible for planning, assisting in, preparing and facilitating extrajudicial killings, which constitute serious human rights violations or abuses.	+

+ OJ: please insert the date of entry into force of this implementing Regulation.

	Names (Transliteration into Latin script)	Names	Identifying information	Reasons for listing	Date of listing
132.	Nihat Abdul Kadir ASAN a.k.a. ASAN, Nihat  ASAN, Nihat Abdulkadir  EBRAHIMHARKIAN, Ramin  KURD, Ibrahim  ASHAN, Nihat  BAHTIYAR		DOB: 1.10.1981 or 11.11.1981  POB: Van, Türkiye  Nationality: Iranian  Gender: male  ID: 2751062326 (Iran)  Passport: U13927927 (Türkiye)	Nihat Asan is a close Zindashti Network associate, who has played a pivotal role in logistical planning for many of the network's assassination attempts. As such, Asan is associated with Naji Zindashti and the Zindashti Network. He is also responsible for planning, ordering, assisting in or facilitating extrajudicial, summary or arbitrary executions and killings, which constitute serious human rights violations or abuses.	+

+ OJ: please insert the date of entry into force of this implementing Regulation.

	Names (Transliteration into Latin script)	Names	Identifying information	Reasons for listing	Date of listing
133.	Reza HAMIDIRAVARI a.k.a. Reza HAMIDI RAVARI	رضا حمیدی راوری (Persian spelling)	DOB: 31.10.1963 Nationality: Iranian Gender: male ID: V40150378	Reza Hamidiravari is an intelligence officer working for the Iranian Ministry of Intelligence (MOIS). He oversees Naji Zindashti's MOIS-directed operations, including the killing of dissidents and critics of the Iranian regime. As such, Reza Hamidiravari is associated with Naji Zindashti and the Zindashti Network, that are responsible for serious human rights violations or abuses, including extrajudicial, summary or arbitrary killings.	+

+ OJ: please insert the date of entry into force of this implementing Regulation.

(2) the following entry is added to the list of natural or legal persons, entities and bodies under heading ‘B. Legal persons, entities and bodies’:

	Names (Transliteration into Latin script)	Names	Identifying information	Reasons for listing	Date of listing
‘34.	The Zindashti Network a.k.a. Zindashti’s criminal network  Zindashti criminal organisation		Date of registration: 18.08.1983  Principal place of activities: Iran, Türkiye, Europe  Associated individuals: Naji Ibrahim Sharifi-Zindashti, Reza Hamidiravari, Nihat Abdul Kadir Asan, Ekrem Abdulkerym Oztunc, Ali Esfanjani, Ali Kocak, Abdulvahap Kocak	The Zindashti Network is a criminal group that has carried out numerous acts of transnational repression including assassinations outside of Iran.  The Zindashti Network is led by Iranian narcotics trafficker Naji Sharifi-Zindashti and is connected to the Iranian Ministry of Intelligence and Security (MOIS), which is the branch of the Iranian government tasked inter alia with kidnapping as well as assassinating persons critical of the actions or policies of the Islamic Republic of Iran, or persons otherwise deemed to be opponents of the Islamic Republic of Iran by the Islamic Republic of Iran.  Therefore, the Zindashti Network is responsible for serious human rights violations or abuses outside of Iran, in particular extrajudicial, summary or arbitrary executions and killings and enforced disappearance of persons.	+

+ OJ: please insert the date of entry into force of this implementing Regulation.

	Names (Transliteration into Latin script)	Names	Identifying information	Reasons for listing	Date of listing
			Other associated entities: Iran's Ministry of Intelligence and Security (MOIS), the Islamic Revolutionary Guard Corps (IRGC)		