



## Gchine Coverup Part 3: Involvement of Amad and MOD

By David Albright and Sarah Burkhard

June 9, 2022

*Documents in the Iran Nuclear Archive expose how in 2003/2004, top level Iranian nuclear and military officials secretly transferred control of the Amad Plan's Gchine mine and uranium concentration plant from the Ministry of Defense and Armed Forces Logistics (MODAFL) to the Atomic Energy Organization of Iran (AEOI), providing a civilian cover story for the facility, at the time Iran's only domestic uranium mine and mill. Archive documents place Gchine as built and initially operated under the MODAFL as part of the Amad Plan to produce uranium ore concentrate for the initial steps in Iran's production of weapon-grade uranium. The record establishes that the AEOI has falsely declared to the International Atomic Energy Agency (IAEA) that the Gchine mine and mill was a civilian facility under its supervision and has used falsified Iranian official documentation to support the claim. This case illustrates Iran's efforts, many of which are on-going, to deceive the IAEA about its nuclear activities.*

Iran's Nuclear Archive contains documentary evidence demonstrating Iran's deceptions in its declarations to the International Atomic Energy Agency about its past military nuclear activities. These deception activities continue today. The extent of its duplicity, involving high level officials, false statements, and altered documents, is illustrated by the case of the Gchine uranium mine and yellowcake production plant, or "mill," located in southern Iran near Bandar Abbas.

The product of the Gchine mine, or alternatively called in the archive the Bandar Project, was uranium ore concentrate (UOC) or yellowcake. The Gchine mine and mill was being built secretly in the early 2000s as part of Iran's nuclear weapons program, codenamed the Amad Plan (see Figure 1). It would have produced the key nuclear source material for Iran's production of highly enriched uranium (HEU) for nuclear weapons in the 2000s. The plant was nearly complete in August 2002, and by mid-2004, had begun initial operations. At the time, Gchine was Iran's only domestic source of uranium; its civilian uranium mine and mill were years behind schedule, were receiving fewer resources, and would not operate for over a decade. After the closure of the Amad Plan and the downsizing of Iran's nuclear weapons program, a priority was keeping Gchine operational for both civilian and potential nuclear weapons reasons while denying to the IAEA and the world that it has ever been part of a nuclear weapons program.

## Timeline of Iran's Deception about the Gchine Mine and Mill

- ~1999 – 2003: Iran secretly builds Gchine mine and mill as uranium source for the Amad nuclear weapons program under Iran's Ministry of Defense and Armed Forces Logistics (MODAFL), contracting Kimia Maadan (KM) for early design and construction work.
- December 22, 2001: Kimia Maadan is dissolved; further construction of Gchine remains under military control.
- ~August 2002: Gchine mine and mill appears near completion.
- March 18, 2003: As ordered by Iran's Supreme National Security Council (SNSC, chaired by Hassan Rouhani, later president) and approved by Gholam Reza Aghazadeh (then head of Atomic Energy Organization of Iran (AEOI)), Iran starts to transfer control of Gchine from MODAFL to AEOI.
- April 8, 2004: Deadline for AEOI to decide whether the company Kimia Maadan or an AEOI-affiliated company should be the cover story to hide military involvement.
- October 2003: Iran agrees to a policy of full transparency with IAEA.
- December 2003: Iran provisionally implements the Additional Protocol.
- 2003/early 2004: Iran's still secret Gchine mine and mill reaches operational status. Satellite imagery indicate initial operations of Gchine had begun by June 2004.
- May 21, 2004: Iran makes its Additional Protocol declarations, which includes its first declaration of Gchine and details about Gchine, to the IAEA.
- July 2004: According to Iran, Gchine mine and mill had begun production in July 2004 with the goal to produce 21 tons of uranium per year.
- ~ September 2004 (via new information from *The Wall Street Journal*): IRGC-general Seyed Ali Hosseini Tash warns head of Amad Mohsen Fakhrizadeh to expect questions about Gchine from the IAEA. He orders Fakhrizadeh to come up with a "comprehensive scheme," which turns out to involve falsification of dissolution records of Kimia Maadan to show that KM existed until mid-2003, in support of the claim that the AEOI was in charge of Gchine's construction throughout. Tash also notes the need for a senior level "policy committee" to approve the final scheme.
- ~2004: Iran prepares falsified dissolution records of Kimia Maadan, showing it was dissolved on June 8, 2003, rather than on December 22, 2001.
- 2008: Iran's fabrication of events and falsified dissolution document are recounted in an IAEA report, which states, "because of KM's financial problems, the company ceased work on the Gchine project in June 2003, when the three-year contract with the AEOI came to an end. Iran stated that KM was officially deregistered on 8 June 2003 and provided a document supporting this statement." The IAEA concluded: "The information and explanations provided by Iran were supported by the documentation, the content of which is consistent with the information already available to the Agency."
- 2015: In a partial, but still incomplete, reversal of its 2008 conclusion, the IAEA reports: "Information available to the Agency prior to November 2011 indicated that the Gchine mine was a potential source of uranium for use in undeclared nuclear activities in the period 2000-2003."
- 2018/2019: The IAEA receives the Iranian Nuclear Archive, revealing Iran's deception about Gchine.



**Figure 1.** The Gchine yellowcake production plant, or mill, as seen in a photo discovered in the Iran Atomic or Nuclear Archive.

The archive materials expose how in 2003/2004 Iran transferred control of the Amad Plan’s Gchine mine and uranium concentration plant from the Ministry of Defense and Armed Forces Logistics (MODAFL) to the Atomic Energy Organization of Iran (AEOI), providing a civilian cover story for the facility while defusing international pressure and helping Iran avoid admission of its secret nuclear weapons program. Iran’s consistent deception and denials to the IAEA about this site contributed to its success in keeping operational, during a period of intense international pressure, this critical element of its emerging nuclear fuel cycle and residual nuclear weapons capability. However, concocting an effective cover story was not simple.

The Institute has written earlier about this case, translating and analyzing Farsi-language documents, corroborating them with information available on official Iranian websites and IAEA safeguards reports from around the time, and publishing two comprehensive reports.<sup>1</sup> Recently, *The Wall Street Journal* obtained additional archive documents containing new details about the Gchine case, in particular the direct involvement of senior MODAFL officials

<sup>1</sup> David Albright, Olli Heinonen, Frank Pabian, and Andrea Stricker, “Anatomy of Iran’s Deception and How Iran Benefited,” *Institute for Science and International Security*, December 19, 2018, <https://isis-online.org/isis-reports/detail/anatomy-of-irans-deception-and-how-iran-benefited-irans-nuclear-archive-con/8/>; and David Albright and Sarah Burkhard: “Gchine Coverup: Part 2,” *Institute for Science and International Security*, February 20, 2020, <https://isis-online.org/isis-reports/detail/gchine-coverup-part-2>. See also *Iran’s Perilous Pursuit of Nuclear Weapons*.

associated with Iran's nuclear weapons program in organizing the deception.<sup>2</sup> Subsequent to this reporting, Israeli Prime Minister Naftali Bennett released the set of documents given to *The Wall Street Journal*. This report integrates the new documentary evidence into our previous archive documentation, adding to the sequence of events of Iran's deception about Gchine.

## The Lie and Its Debunking

### Iran's False Declaration to the IAEA

Iran misled the IAEA by denying that Gchine was ever part of the Amad Plan under military control and by falsely claiming that it was a long-standing civilian plant under the Atomic Energy Organization of Iran (AEOI).

According to the IAEA, Iran declared that the AEOI's Ore Processing Center (OPC) conducted the preparatory work for building the Gchine mine and mill, and that the project received approval on August 25, 1999, under the AEOI's 1999-2003 five-year plan, discussed below. To build Gchine, according to Iran's official declaration, the AEOI contracted with Kimia Maadan Company, described as a new company which drew core staff from the AEOI's OPC at the Tehran Nuclear Research Center. Iran provided the IAEA with supporting documentation that Kimia Maadan was registered as a company on May 4, 2000. Further, according to a 2008 IAEA summary of Iran's declaration to the IAEA:<sup>3</sup>

*Iran stated that KM [Kimia Maadan] had had only one project—the one with the AEOI for construction of the Gchine UOC [uranium ore concentration] plant on a turnkey basis. According to Iran, because of KM's financial problems, the company ceased work on the Gchine project in June 2003, when the three-year contract with the AEOI came to an end. Iran stated that KM was officially deregistered on 8 June 2003 and **provided a document supporting this statement.** After KM stopped work, the OPC again took over work on the Gchine UOC plant. (emphasis added)*

A key point in Iran's false narrative was that Kimia Maadan existed and controlled Gchine until 2003, the end of the purported AEOI five-year plan, which was likely the five-year plan of Amad to build five nuclear weapons. However, the truth was that Kimia Maadan had already been dissolved two years prior, in 2001, and the deregistration document provided to the IAEA citing June 8, 2003, was falsified.

Although the IAEA suspected Gchine's original purpose and had obtained information from member states and other sources indicating Gchine's original military nuclear purpose, Iran's deception forced the IAEA into a difficult corner by 2008. There were a few senior IAEA officials

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<sup>2</sup> Laurence Norman, "Iran Used Secret U.N. Records to Evade Nuclear Probes," *The Wall Street Journal*, May 25, 2022, <https://www.wsj.com/articles/iran-used-secret-u-n-records-to-evade-nuclear-probes-11653473247>.

<sup>3</sup> IAEA Director General, *Implementation of the NPT Safeguards Agreement in the Islamic Republic of Iran*, GOV/2008/4, February 22, 2008, [https://isis-online.org/uploads/isis-reports/documents/IAEA\\_Iran\\_Report\\_22Feb2008.pdf](https://isis-online.org/uploads/isis-reports/documents/IAEA_Iran_Report_22Feb2008.pdf).

and member states who sought to discount Iran's falsified evidence, but in the end the IAEA did not take a tough position with Iran on the issue of Gchine. Iran's presentation of this falsified document played a role in getting the IAEA to back down. The IAEA's February 2008 safeguards report stated: "The information and explanations provided by Iran were supported by the documentation, the content of which is consistent with the information already available to the Agency."<sup>4</sup> But the report did not bring the Gchine saga to closure, stating, "However, the Agency continues, in accordance with its procedures and practices, to seek corroboration of its findings and continues to verify this issue as part of verification of the completeness of Iran's declarations."

In a partial reversal of its 2008 conclusion, the IAEA stated in 2015: "Information available to the Agency prior to November 2011 indicated that the Gchine mine was a potential source of uranium for use in undeclared nuclear activities in the period 2000-2003."<sup>5</sup> Although the 2015 statement was by implication somewhat more skeptical about Iran's Gchine declaration, it did not challenge Iran's deception about the origin or control of Gchine.

With the receipt of the Iran Nuclear Archive in 2018/2019, the IAEA has in its possession the proof of Iran's deception about Gchine. It should update its assessment about Gchine, reflecting the new information at its disposal.

### **Deconstructing the Lies to the IAEA**

Iran's cover-up of Gchine required two false statements to the IAEA:

- 1) Gchine was never under military control or planned for use to make uranium for nuclear weapons; and
- 2) Gchine was always under the ownership and authority of the AEOI.

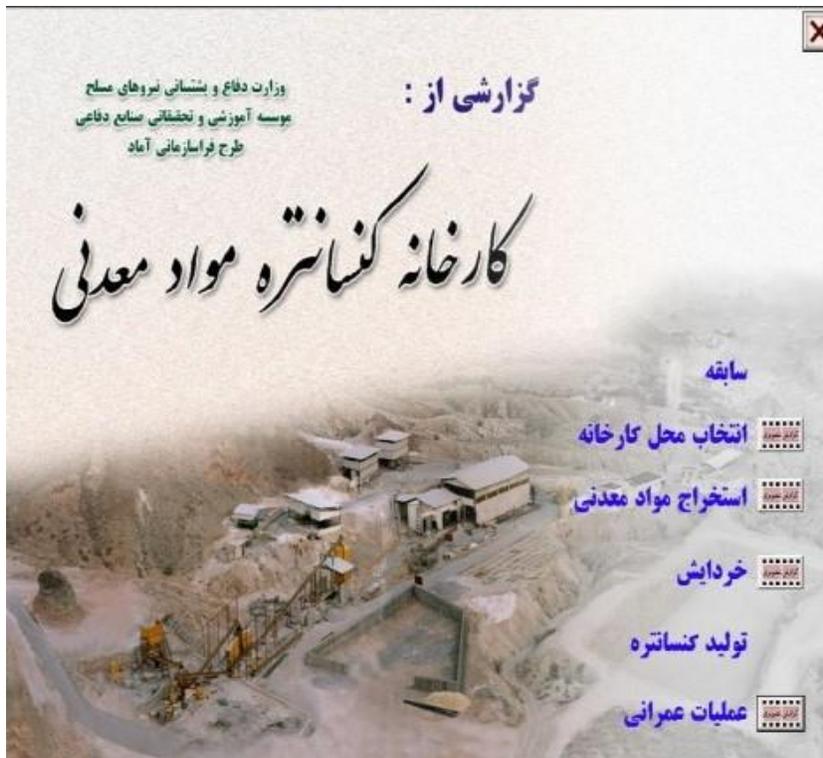
Documents in the archive disprove both claims, while also showing senior level involvement in deceiving the IAEA. The documents show the involvement of the Supreme National Security Council (SNSC), then chaired by Hassan Rouhani, Amad Plan personnel and other senior MODAFL personnel, and officials in the judicial system.

The first assertion is the most straightforward to debunk. Figure 2 from the archive directly contradicts this claim. It is a PowerPoint presentation title page that discusses a Mineral Concentrate Factory, with an image of Gchine showing it as part of the Amad Supraorganizational Plan, bureaucratically under the Institute for Training and Research of Defense Industries of MODAFL. The presentation places Gchine under the MODAFL and as part of the Amad Plan to produce uranium ore concentrate for the initial steps in Iran's production of weapon-grade uranium.

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<sup>4</sup> *Implementation of the NPT Safeguards Agreement in the Islamic Republic of Iran*, GOV/2008/4.

<sup>5</sup> IAEA Director General, *Final Assessment on Past and Present Outstanding Issues regarding Iran's Nuclear Programme*, GOV/2015/68, December 2, 2015, <https://www.iaea.org/sites/default/files/gov-2015-68.pdf>.



**Figure 2.** Title page of Iranian presentation on Gchine in Farsi (top) and translation by professional translation service (bottom). Compare the photo in this slide to that in Figure 1. The presentation was prepared by MODAFL’s Institute for Training and Research on Defense Industries (aka Defense Industries Training and Research Institute) as part of the AMAD program. Supraorganizational could also be translated as interagency.

During that time, Mohsen Fakhrizadeh is well known for heading the Amad Plan and post-Amad nuclear weapons efforts. Seyed Ali Hosseini Tash, an IRGC general, headed the Institute for Training and Research of Defense Industries, which housed Amad and its predecessor, the Physics Research Center. Tash is far less known outside of Iran than Fakhrizadeh, but equally important in terms of supporting nuclear weapons activities. Moreover, he also had a successful career, post Amad. By 2006, he was deputy secretary of Iran's Supreme National Security Council, a position he also held in 2015.<sup>6</sup> In 2006, he denounced the idea of Iran agreeing to another suspension of its uranium enrichment program, telling the Iranian IRNA media service that suspension is "totally out of question," and a "red line."<sup>7</sup>

Iran's second claim of Gchine having always been under the AEOI's ownership and authority involved an elaborate deception, but it can be understood by examining other Iranian documents in the archive.

The first document, which has been available for a few years, is a translated record of decisions reached by a senior group of Iranian officials following an act of the Supreme National Security Council of Iran, headed then by Hassan Rouhani, and approval by the then head of the AEOI, Gholam Reza Aghazadeh. It discusses the transfer of Gchine from the military program to the AEOI, called "evolution and delivery" in the document.<sup>8</sup> This decision document, translated in Figure 3, states that the "process of delivering the above-mentioned project to the Iranian Atomic Energy Organization started on March 18, 2003."<sup>9</sup> The document continues, "The Iranian Atomic Energy Organization would declare the above-mentioned project to the International Atomic Energy Agency as the uranium mine and uranium concentration plant under the supervision of the atomic energy organization."<sup>10</sup>

The March 2003 date suggests the planning of the transformation of at least part of the Amad Plan started before the summer of 2003. This early planning was likely necessitated by the Iranian recognition of the difficulty of continuing to keep Gchine's existence secret. After all, uranium mines and especially mills are relatively easy for Western intelligence agencies to identify via overhead surveillance.

According to this document, the AEOI was ordered to decide by April 8, 2004, whether to develop a cover story involving companies affiliated with the AEOI or Kimia Madan [or Maadan] Industrial Group, a company affiliated with the Amad Plan and not the AEOI. The document states that the AEOI "would evaluate all various scenarios about this evolution and delivery in a way that it complies further with agency's [IAEA's] inspection."

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<sup>6</sup> "SNSC Denies Signing Deal with IAEA," Mehr News Agency, August 23, 2015.

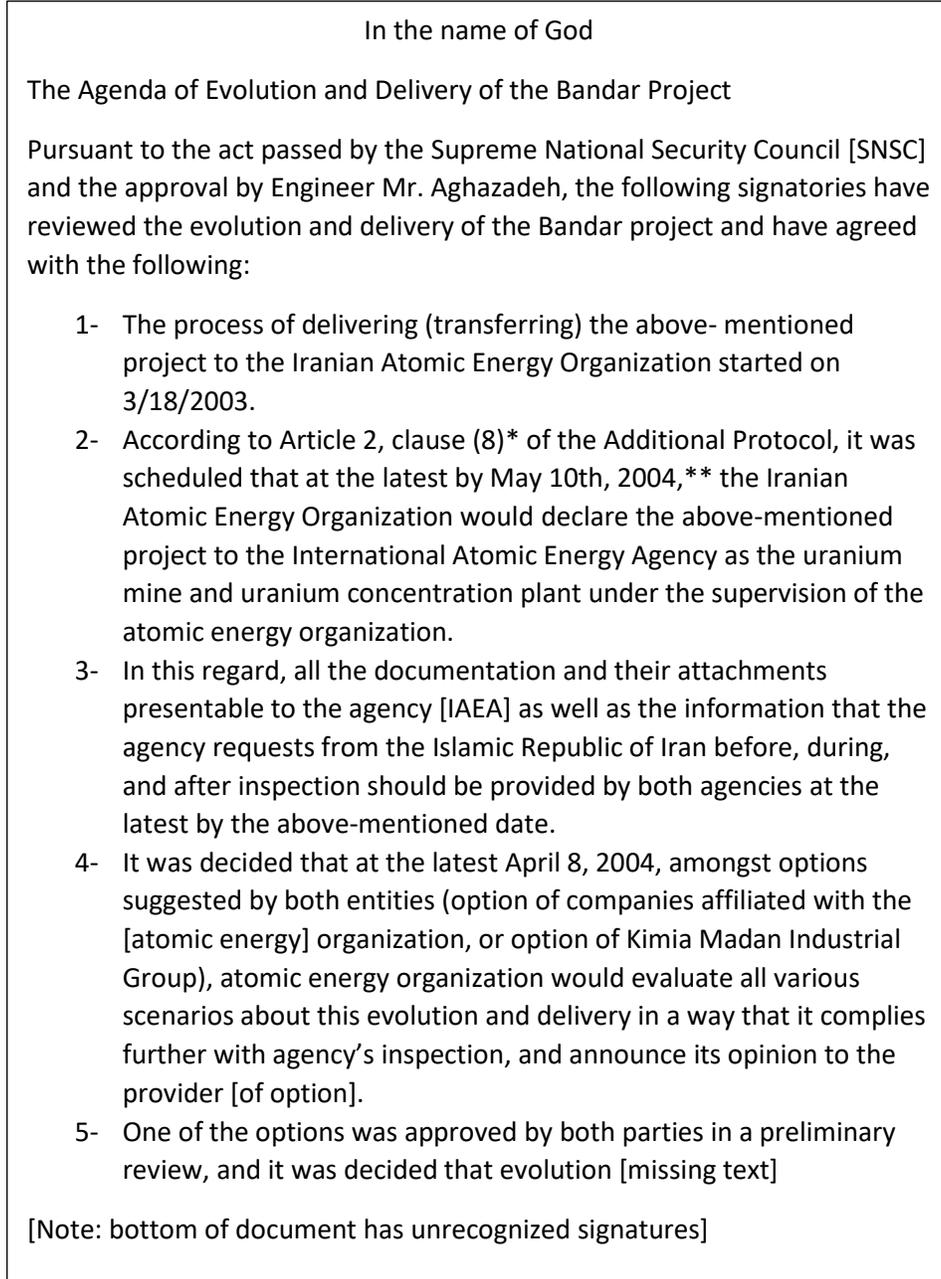
<sup>7</sup> "Suspension of Enrichment, Not a Confidence Building Step: Official," Islamic Republic News Agency, April 24, 2006. See for example, <https://en.shana.ir/news/83407/Suspension-of-Enrichment-Not-a-Confidence-Building-Step-Official>.

<sup>8</sup> "Anatomy of Iran's Deception and How Iran Benefited," Figure 9.

<sup>9</sup> "Anatomy of Iran's Deception and How Iran Benefited."

<sup>10</sup> "Anatomy of Iran's Deception and How Iran Benefited."

## Review of the Implementation of the Decision to Deceive the IAEA about Gchine



**Figure 3.** A page from a three-page document on Iran's implementation of SNSC decision to transfer the Bandar Project, aka the Gchine mine and uranium concentration plant to the Atomic Energy Organization of Iran. Prior to that it had been under the control of the Ministry of Defense and Armed Forces Logistics. Engineer Aghazadeh at the time was head of the Atomic Energy Organization of Iran. The document's date is prior to April 8, 2004.

### Comments

\*The correct clause is 2. a. (v).

\*\*Delayed until May 21, 2004.

بسم تعالی

صدقه فی حق و کمال بیوز، بعد

بیمه معدوم شد در وقت بی روزانگی، تا رسیدن آماره، انقضای آن در این سر اصل  
قبول و کمال بیوز، بعد از آنکه در شرح ذیل تعلق می‌دهد:

۱- از تاریخ ۲۸ بهار ۸۲، در حق بیوز، یاد شده به ساریه از آنجا که بیوز، آماره در روز  
۱۱ خرداد ۸۲، ساریه از آنجا که بیوز، یاد شده تا ۱۱ اردیبهشت ۸۳، سال ۱۳۸۳ (۱۳۰۴)

سابقه مانده ۲ نفر (۱۳) سوگند ایمن بیوز، صرفاً از آنجا که بیوز، یاد شده تا ۱۱ اردیبهشت ۸۳، سال ۱۳۸۳ (۱۳۰۴)  
زیرین ساریه از آنجا که بیوز، یاد شده تا ۱۱ اردیبهشت ۸۳، سال ۱۳۸۳ (۱۳۰۴)

۲- در این ساریه، در تاریخ ۱۱ اردیبهشت ۸۳، سال ۱۳۸۳ (۱۳۰۴) قبضه مانده از آنجا که  
بیوز، یاد شده تا ۱۱ اردیبهشت ۸۳، سال ۱۳۸۳ (۱۳۰۴) قبضه مانده از آنجا که  
بیوز، یاد شده تا ۱۱ اردیبهشت ۸۳، سال ۱۳۸۳ (۱۳۰۴) قبضه مانده از آنجا که

شماره پرونده	۲۱
تاریخ	۲۸ بهار ۸۲

۳- ساریه از آنجا که بیوز، یاد شده تا ۱۱ اردیبهشت ۸۳، سال ۱۳۸۳ (۱۳۰۴) قبضه مانده از آنجا که  
بیوز، یاد شده تا ۱۱ اردیبهشت ۸۳، سال ۱۳۸۳ (۱۳۰۴) قبضه مانده از آنجا که  
بیوز، یاد شده تا ۱۱ اردیبهشت ۸۳، سال ۱۳۸۳ (۱۳۰۴) قبضه مانده از آنجا که

۴- ساریه از آنجا که بیوز، یاد شده تا ۱۱ اردیبهشت ۸۳، سال ۱۳۸۳ (۱۳۰۴) قبضه مانده از آنجا که  
بیوز، یاد شده تا ۱۱ اردیبهشت ۸۳، سال ۱۳۸۳ (۱۳۰۴) قبضه مانده از آنجا که  
بیوز، یاد شده تا ۱۱ اردیبهشت ۸۳، سال ۱۳۸۳ (۱۳۰۴) قبضه مانده از آنجا که

۵- ساریه از آنجا که بیوز، یاد شده تا ۱۱ اردیبهشت ۸۳، سال ۱۳۸۳ (۱۳۰۴) قبضه مانده از آنجا که  
بیوز، یاد شده تا ۱۱ اردیبهشت ۸۳، سال ۱۳۸۳ (۱۳۰۴) قبضه مانده از آنجا که  
بیوز، یاد شده تا ۱۱ اردیبهشت ۸۳، سال ۱۳۸۳ (۱۳۰۴) قبضه مانده از آنجا که

Figure 4. Original Page in Farsi of minutes of decisions translated in Figure 3.

As evident from its declarations to the IAEA, the AEOI decided to use Kimia Maadan, although as will be discussed below, MODAFL played a more critical role in devising the deception. Kimia Maadan had in fact contracted for the Amad Plan on both the Gchine uranium mine and mill and the planned New Tehran Plant, a production-scale plant to make uranium hexafluoride for further enrichment to weapon-grade uranium. Although the New Tehran Plant was never built, Kimia Maadan was designing the plant, as evidenced by its name prominently displayed on several of the plant's blueprints.<sup>11</sup> The choice of Kimia Maadan probably reflected acknowledgement that the use of a cover company involved in Gchine would improve the chances of successfully fooling the IAEA, a tactic that largely worked until the discovery of the Nuclear Archive.

The deception to the IAEA was not an ad hoc mid-level decision. It involved coordination and direction by the highest authorities in Iran. One of the new archive documents provided to *The Wall Street Journal* reveals the direct involvement of Fakhrizadeh and Tash in organizing the deception to the IAEA.

The new document is a letter from Fakhrizadeh, dated September 2, 2004, to General Tash (full letter and English translation in Figure 5.)

The letter states:

With respect, attached presenting the last summary regarding Kimiya Maadan Company. A copy of the document, including the appendixes, was provided to the Protection [Organization] to discuss and comment on in their internal committee. Please provide your corrections and guidance to redact the final version if needed.

Tash wrote a note in the margin of the memorandum, instructing Fakhrizadeh to take further action urgently:

Mr. Fakhrizadeh: This is one of the critical areas that sooner or later they (the agency) will question us about it. Therefore, we must have a comprehensive scheme for it. Conduct a meeting with Mr. Barzegar and, if necessary, with Sardar [IRGC General] Kalantari to finalize the scheme and recommendations so that later, it is presented and finalized in the policy meeting (with Sardar Vahidi and Sardar Sadegh).

Whenever your work is ready, notify us to schedule the meeting. Of course, you must rush.

[Signed by writing name:] Hosseini T.

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<sup>11</sup> David Albright and Sarah Burkhard, "New Information about Iran's Production of Uranium Hexafluoride under the Amad Plan," *Institute for Science and International Security*, April 2, 2020, <https://isis-online.org/isis-reports/detail/irans-production-of-uranium-hexafluoride-under-the-amad-plan/8>.

The letter and margin note show Tash anticipating potential IAEA questions and pressing Fakhrizadeh to rush to finish the “comprehensive scheme.” He also notes the need for a senior level “policy committee” to approve the final scheme.

The Protection Organization was likely part of the Ministry of Defense and engaged in coordinating nuclear matters. The committee could be a nuclear committee responsible for managing discussions with the IAEA. Such a committee did exist later in 2007 and was managed by Nasrallah Kalantari, then head of Defensive Studies and Affairs Bureau, MODAFL. The committee’s members also included the Minister of Defense and Fakhrizadeh.<sup>12</sup>

Tash’s response identifies Sardar Vahidi, likely Vice Minister for Planning and International Affairs Ahmad Vahidi. Later, Vahidi became Minister of Defense.

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<sup>12</sup> See also *Iran’s Perilous Pursuit of Nuclear Weapons*, discussion of the Iran Nuclear Committee.

In the Name of God

Honorable Deputy Minister [of Defense] Sardar, [*Translator Comment: Sardar is a generic term used to call IRGC Generals. For some reason (possibly for security reasons), Fakhrizadeh did not mention the name of the General. The second note, written in black and signed as "Hosseini T." suggests the Sardar might have been the IRGC Brigadier General Seyed Ali Hosseini Tash, who between 1382-1384 (2003-2005) was the Deputy Minister of Defense.*]

Document # 6

Page 1 of 7

Greetings

With respect, attached presenting the last summary regarding Kimiya Maadan Company.

A copy of the document, including the appendixes, was provided to the Protection [Organization] to discuss and comment on in their internal committee. [*Translator Comment: Fakhrizadeh, in short, used the word "Hefazat" here, which means "Protection," referring to a Protection Organization. Although it can refer to any Protection Organization belonging to smaller organizations, in this context, it should likely refer to either the Intelligence Protection Organization of the Islamic Revolutionary Guard Corps (IRGC) or the Intelligence Protection Organization of the Ministry of Defence and Armed Forces Logistics (MODAFL).*]

Please provide your corrections and guidance to redact the final version if needed.

Thanks,

Fakhrizadeh

12/6/1383 [9/2/2004]

- Second notes written in black ink at the bottom of the letter:

In the Name of God

Mr. Fakhrizadeh: This is one of the critical areas that sooner or later they (the agency) will question us about it. Therefore, we must have a comprehensive scheme for it. Conduct a meeting with Mr. Barzegar and, if necessary, with Sardar [IRGC General] Kalantari to finalize the scheme and recommendations so that later, it is presented and finalized in the policy meeting (with Sardar Vahidi and Sardar Sadegh).

[*Translator Comment: The writer noted the names within parentheses. He is likely referring to IRGC Brigadier general Ahmad Vahidi, who between 2003–2005 was the Vice Minister of Defense for Planning and International Affairs.*]

Whenever your work is ready, notify us to schedule the meeting. Of course, you must rush.

[Signed by writing name:] Hosseini T.

**Comment:** Brackets and enclosed text are inserted by the translator; parentheses are in original.

بسمه تعالی

سه دارجائسین محترم وزارت

سلام علیکم

شماره سندوک	۹
صفحه	۱ از ۶

با احترام به پیوسته آفرین جمع بندی در مورد سه گت  
کیمیا معدن تقدیم می گردد.

لیک نسخه از نامه به همراه پیوسته تا برخطی حفاظت  
حیث طرح در کمیته داخلی خودشان و انتظار نظاره  
تحويل بند.

خواهشمند است اصلاحات وارث را در اعمال مشاهده  
در صورت نیاز نسخه نهایی تحه بر شود.

باتشکر  
محمّدی زاده  
۱۳۸۷/۶/۲۸

بسمه تعالی

موضوع: این نامه از طرف وزارت معادن و فلزات به وزارت نفت ارسال شده است. این نامه در مورد سه گت معدن کیمیا معدن است. در این نامه به درخواست وزارت معادن و فلزات در مورد سه گت معدن کیمیا معدن اشاره شده است. این نامه در مورد سه گت معدن کیمیا معدن است. در این نامه به درخواست وزارت معادن و فلزات در مورد سه گت معدن کیمیا معدن اشاره شده است. این نامه در مورد سه گت معدن کیمیا معدن است. در این نامه به درخواست وزارت معادن و فلزات در مورد سه گت معدن کیمیا معدن اشاره شده است.

Figure 5. Original letter from Fakhrizadeh and margin notes from Hosseini Tash in Farsi with English translation on previous page.

The scheme mentioned by Tash undoubtedly involved the alteration of Kimia Maadan's deregistration or dissolution document, filed with the Document and Property Registration Organization, Ministry of Justice. The alteration appears to have occurred in about 2004, a date the Institute could not establish in its earlier study on the altered document.<sup>13</sup>

According to the original document, Kimia Maadan Natanz was "announced dissolved" on December 22, 2001, and the announcement of dissolution, or deregistration, by the Iranian Document and Property Registration Organization, occurred on February 7, 2002 (an English translation is in the boxes below and the original is in Figure 6).<sup>14</sup> This document contains markings, serving as instructions, where modifications were needed as part of producing a new document with altered dissolution dates, in particular a modified deregistration date of June 8, 2003, 18 months later and an exact match of the date given by Iranian officials to the IAEA, in line with Iran's falsified chronology in its IAEA declaration. (This dissolution document is described and analyzed in the sidebar, Summary of the Dissolution Document.)

The official dissolution document lists Mahmoud Haratian Nezhadi as the settlement director, with the settlement address given as Tehran, Vanak, Molla Sadra Street, South Shiraz Street, East Garmsar St, No. 13. This may have been the address of Kimia Maadan. Other information provided to the IAEA indicated that the head of Kimia Maadan, a Mr. Haratian, had close relations with the Physics Research Center, the military predecessor of the Amad program. It is highly likely that this is the same person, providing another link between Kimia Maadan Natanz, Kimia Maadan more generally, and the military nuclear program.

Figures 7 and 8 show the amended document with an English translation, with all the date alterations and the same registration number as the original. This may be the final or near final version given to the IAEA and mentioned in the Iran's official declaration to the IAEA.

## Last Word

Despite the altered document stymieing the IAEA's investigation in the 2000s, the IAEA in 2008 stated its openness to new information, an openness rooted in its mandate to determine whether new information corroborates or contradicts its findings and assessments related to the completeness of Iran's nuclear declaration. The documents in the archive establish that Iran consistently misled the IAEA about Gchine, building it originally as an undeclared, covert nuclear fuel cycle aimed at nuclear weapons production. As part of reorienting its nuclear weapons program in late 2003, Iran decided to deceive the IAEA as part of a strategy to maintain this facility as a vital part of maintaining its nuclear weaponization capabilities. With the new information from the Nuclear Archive, the IAEA should update its assessment about Gchine.

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<sup>13</sup> "Gchine Coverup: Part 2."

<sup>14</sup> For more details and analysis of this document, see David Albright and Sarah Burkhard: "Gchine Coverup: Part 2," *Institute for Science and International Security*, February 20, 2020, <https://isis-online.org/isis-reports/detail/gchine-coverup-part-2>.

## Summary of the Dissolution Document

The one-page document in Figure 6 is in two parts (see also the accompanying translation on the following pages, where translator comments are in italics). The top part is an announcement of dissolution, or deregistration, of Kimia Maadan Natanz Limited Liability Company, by the Document and Property Registration Organization of the Islamic Republic of Iran, Judicial System of Iran. The date of the document is given as February 7, 2002. The document states, “Based on the minutes of the extraordinary General Assembly dated December 22, 2001, the said company was announced dissolved.” This sentence may refer to an action of the board or shareholders of Kimia Maadan Natanz to dissolve the company. Above the typed date of December 22, 2001, a new date of May 22, 2003 appears in handwritten blue ink. Above the typed date of February 7, 2002, the new date of June 8, 2003 is handwritten. There is also a handwritten modification of the date of the signing of the document.

The bottom part of the document contains three newspaper announcements, which are undated, with the one for Kimia Maadan Natanz in the middle. (The part referring to Kimia Maadan is encircled and marked with X’s. This portion of the document appears to have been cut from a national newspaper and placed below the memo and photocopied together, perhaps intended to create false authenticity. Under Iranian government regulations, all company registrations and dissolutions need to be published in certain national newspapers, and this seems to be a copy of such a newspaper. This segment contains three different announcements that seem to belong to three different companies that were most likely dissolved around the same timeframe. On the right side of these three announcements is illegible text about other companies. The text is incomplete, but in two instances, the year 1380 is mentioned, which is a match for the dates of the three dissolution announcements. Just as in the official dissolution announcement for KM Natanz, above the February 7, 2002 date is the date June 8, 2003, handwritten in blue. Handwritten above the December 22, 2001 date is May 22, 2003.

## Translation of the One-Page Typed Document in Figure 6, Top and Bottom Sections Translated and Annotated Separately

### I. Top Part of Document

Number: 18/11/80 (02/07/2002)

*[Translator comment: A handwritten date in blue ink is above this date, which is 18/3/82 (06/08/2003)]*

Date: 40479 / [illegible, possibly handwritten 32]

*[Translator Comment: The number and date are reversed.]*

Attachment: \_\_\_\_\_

**Judicial System of Iran**

**Document and Property  
Registration Organization of  
the Islamic Republic of Iran**

[illegible]

Announcement of Dissolution of Kimia Maadan Natanz Limited Liability Company (LLC) registered under No. 162050. Based on the minutes of the extraordinary General Assembly dated 1/10/80 (12/22/2001) *[Translator Comments: A handwritten date in blue ink is above this date, which is 1/3/82 (05/22/2003)]*, the said company was announced dissolved, and Mr. Mahmoud Haratian Nezhadi was selected as the settlement director, and the address of the settlement location is Tehran, Vanak, Molla Sadra Street, South Shiraz Street, Eastern Garmsar Street, No. 13. [illegible]

Commercial Institutions and Companies Registration Office

*[Translator Comments: below this last line in the original, there is a signature, and it looks like the signature contains the name of the individual who signed the document, however, someone crossed over the date of signing of the document and then there is an arrow in blue pointing to the omitted area stating "handwritten correction." Next to this, there is a stamp that belongs to the Document and Property Registration Organization of the Islamic Republic of Iran of Judicial System of Iran (all of these are written in the seal). Under that, there is a rectangular stamp in red, which could be used by Iran for recording a document in the Nuclear Archive. There are three numbers within the rectangular, one is [illegible] but potentially refers to the number of distributed copies, which seems to be 9, and the other two numbers are likely the number of pages, which suggest that this memo is page number 13 of a document that has 17 pages.]*

### II. Bottom Part of Document (see next page for text of this document)

*[Translator Comment: on the bottom part of the page, under the body of the official dissolution record, there are three newspaper announcements of dissolution for different companies back to back around the same timeframe, described in more detail below. This section was likely cut from some national newspaper and then placed next to the memo and photocopied together. By the regulations, all company registrations and dissolutions need to be published in certain national newspapers, and this section seems to be a copy of such a newspaper. The second announcement belongs to Kimia Maadan Natanz and is as follows:]*

This announcement number is inconsistent with the handwritten date 18/3/82 but is consistent with the typed date 18/11/80.

Number 32/40479

18/11/80 (02/07/2002)

[Translator Comments: A handwritten date in blue ink is above this date, which is 18/3/82 (06/08/2003)]

**Announcement of Dissolution of Kimia Maadan Natanz Limited Liability Company (LLC)**

Registered under No. 162050

Based on the minutes of the extraordinary General Assembly dated 1/10/80 (12/22/2001) [Translator Comments: A handwritten date in blue ink is above this date, which is 1/3/82 (05/22/2003)], the said company was announced dissolved, and Mr. Mahmoud Haratian Nezhadi was selected as the settlement director, and the address of the settlement location is Tehran, Vanak, Molla Sadra Street, South Shiraz Street, East Garmsar Street, No. 13.

P 52402

Commercial Institutions and Companies  
Registration Office

[Translator Comments: On the right side of these three announcements are some illegible texts about some companies. The text is incomplete, but in two instances the year 1380 can be discerned, a match with the typed dates of the three dissolution announcements but not a match with the handwritten blue ink dates.]

[Translator Comments: the first announcement, directly above the Kimia Maadan announcement, is partially visible. The visible area is as follows:] 26/10/80 (01/16/2002)

[Translator Comments: A handwritten date in blue ink is above this date, which is 26/3/82 (06/16/2003)], the said company was announced dissolved, and Mr. Mahmoud Sameni was selected as the settlement director, and the address of the settlement location is Tehran, Piroozi, Baghcheh Bidi Square, Shahid Faraji Alley, No. 5.

P 52408 [illegible] Commercial Institutions and Companies Registration Office

[Translator Comments: the third announcement is only partially visible. The visible area notes as follows:]

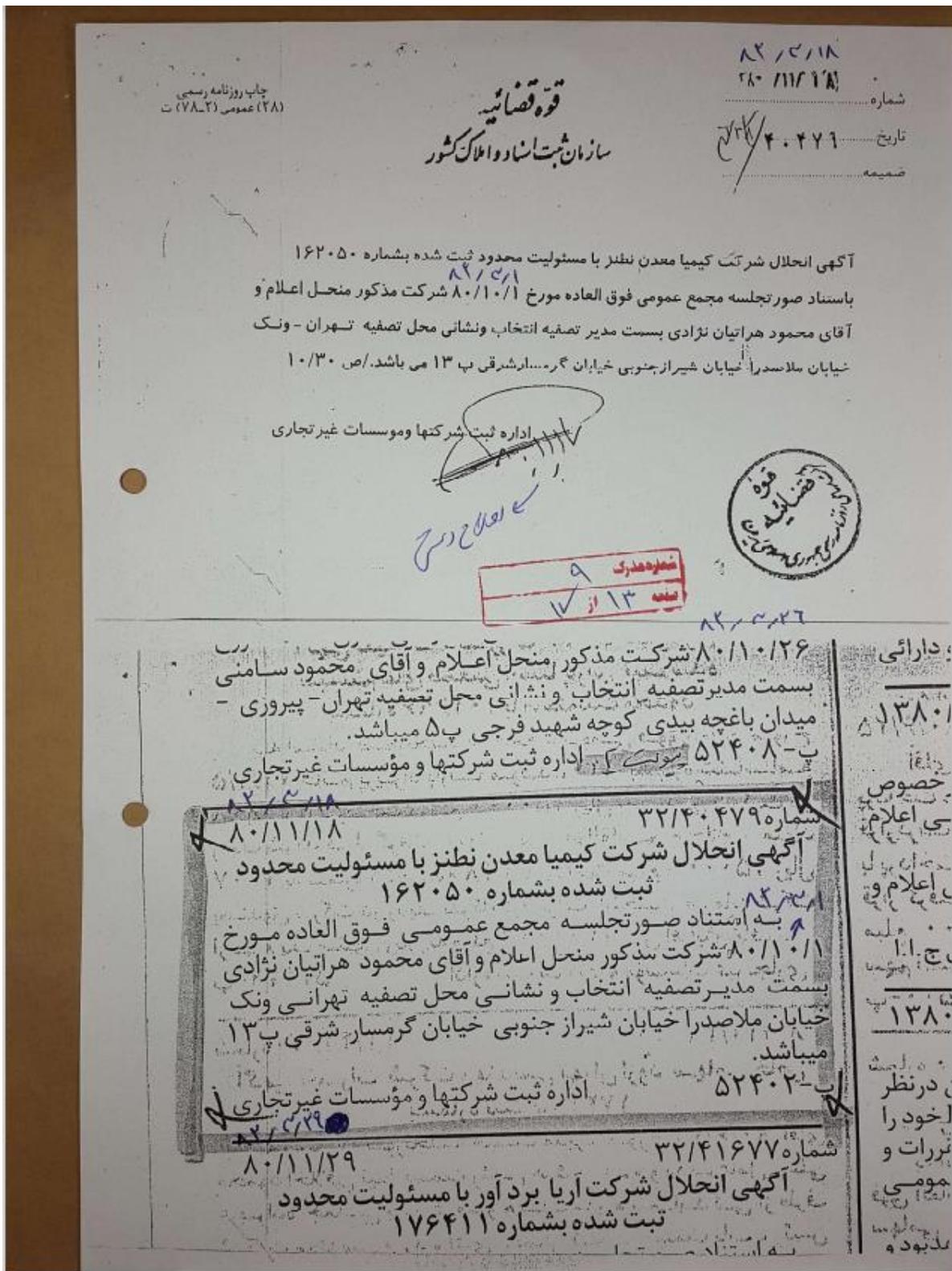
Number 32/41677

29/11/80 (02/18/2002)

[Translator Comments: A handwritten date in blue ink is above this date, which is 29/3/82 (06/19/2003)]

This announcement number is also inconsistent with the handwritten date 29/3/82 but is consistent with the typed date 29/11/80.

**Announcement of Dissolution of Arya Bardavar Co. Ltd**  
Registered under No. 176411



**Figure 6.** Farsi-language dissolution document from the Nuclear Archive showing the liquidation of Kimia Maadan Natanz and alterations in the dates, with English translation and commentary on three previous pages.

Number: 18/3/1382 (06/08/2003)  
Date: 40479 / [illegible] [Translator  
Comment: the original document is wrong,  
and they typed the number and date in wrong  
fields. Also, there is an illegible word (it  
possibly has a 38 in it) next to the number  
and the number is not clear either and might  
not be 40479.]  
Attachment: \_\_\_\_\_

## ***Judicial System of Iran***

### ***Document and Property Registration Organization of the Islamic Republic of Iran***

Published Official Newspaper  
(28) Public (78\_2) T [Translator Comment:  
The letter "T" is not very clear and might be  
a S or B as in Farsi, these letters have  
relatively similar looks.]

Announcement of Dissolution of Kimia Maadan Natanz Co. Ltd registered under No. 162050. Based on the extraordinary General Assembly minutes dated 1/3/82 (05/22/2003), the said company was announced to be dissolved, and Mr. Mahmoud Haratian Nezhadi was selected as the settlement director. The address of the settlement location is Tehran, Vanak, Molla Sadra Street, South Shiraz Street, East Garmsar Street, No. 13. / 10 / 30 S

Commercial Institutions and Companies Registration Office

*[Translator Comments: there is a signature here potentially containing the first letter of the individual's last name, which might be "S." However, it is unclear and just a guess. There is a handwritten date under the signature, which is also unclear, but it appears that it is 17/3/82, or June 7, 2003. Next to the signature and date, a stamp belongs to the Document and Property Registration Organization of the Islamic Republic of Iran of Judicial System of Iran (all of these are written on the stamp). Under that, a rectangular stamp in red is typically used for document archiving. The top block is "Document Number," which is handwritten 9. The lower block shows the page number: Page 14 of 17 (Suggesting that this memo is page 14 of a 17-page document, which is document # 9).]*

**Figure 7.** The altered Kimia Maadan dissolution document with translator comments in italics.

قوه قضائیه  
سازمان ثبت اسناد و املاک کشور

۱۳۸۲/۳/۱۸

شماره

۲۰۲۲۶/۳۲۴

تاریخ

صفحه

آگهی انحلال شرکت کیمیا معدن نطنز با مسئولیت محدود ثبت شده بشماره ۱۶۲۰۵۰  
باستناد صورت جلسه مجمع عمومی فوق العاده مورخ ۱/۳/۸۲ شرکت مذکور منحل اعلام و  
آقای محمود هراتیان نژادی بسمت مدیر تصفیه انتخاب و نشانی محل تصفیه تهران - ونک  
خیابان ملاصدرا خیابان شیراز جنوبی خیابان گرمسار شرقی پ ۱۳ می باشد. / ص ۱۰/۳۰

اداره ثبت شرکتها وموسسات غیر تجاری

۱۳۸۲



شماره ۹	شماره ۵
۱۶	از ۱۶

Figure 8. The Farsi original.