KHEIROLLAH KHADEMI

KHADEMI'S ROLE IN THE 25-YEAR AGREEMENT WITH CHINA

UNVEILING
UNTOLD
REALITIES

Corruption in bitumen distribution



CLOSE
RELATIONS
WITH SENIOR
COMMANDERS
OF THE IRGC

Assessing Corruption Risks in Iran's Transportation and Urban Development under Deputy Minister Khademi

Iran

NOV 2023

Research Hypothesis: Khademi is an Iranian government official currently serving as the deputy Minister of Transport and Urban Development and directs the Construction and Development of Transportation Infrastructures Company, two sectors that historically have been rife with corruption.

RQ1: How does Khademi's efforts to provide new commercial routes within Iran and external connecting to surrounding countries, contribute to the perpetuation of corruption within the broader construction and transport industries?

I.Findings

1. Topline Findings

Long-term leadership and influence: Kheirollah Khademi's continued role as CEO of the Iran Construction and Development of Transportation Infrastructure Company (CDTIC) and his position as Deputy Minister of Roads and Urban Development, despite political changes within Iran, underscores his significant influence in these sectors. His involvement in various corporate boards underscores his far-reaching impact on Iran's transportation and urban development landscape.

Ties to the Islamic Revolutionary Guard Corps (IRGC): Khademi's close ties to the Revolutionary Guard, particularly the Khatam-al Anbiya Construction Headquarters Central Headquarters, and his relationships with appointees of Supreme Leader Ali Khamenei suggest deep entrenchment within Iran's military and political structures. These relationships have facilitated the execution of major transportation and road projects in Iran and indicate Khademi's alignment with key power centers in the country.

Strategic International Relations: Khademi's role in strengthening Iran's relations with China and Russia, particularly in the areas of transportation and infrastructure development, underscores his strategic importance in Iran's foreign policy. His involvement in enhancing cooperation with Iraq for the Arba'in pilgrimage also demonstrates his influence in initiatives of religious and diplomatic significance.

In only one case, Mohammad Eslami, the former minister of roads and urban development, announced on September 12, 2018, that Ali Khamenei had agreed to allocate up to 300 million euros from the National Development Fund for the Chabahar-Zahedan-Sarakhs railway. Although more than a decade has passed, the status of this project is still unclear.

From next year, according to Khademi's recent statements, the supervisors of the projects of construction and development of transportation infrastructure will be required to present the qualification certificate of the Road, Housing and Urban Development Research Center. that these licenses will be issued by the entity under his supervision, and this means controlling the employers of transportation projects.

2. Identity

Kheirollah Khademi was born in 1965 in Andimeshk County in Khuzestan Province, located in southwestern Iran. He completed his primary, middle, and High school education in Andimeshk and studies in civil engineering at Ahvaz's Shahid Chamran University. In 1988, after completing his associate degree studies, he participated in the National University Entrance Exam (Konkour) for mathematics and physics, and was accepted for civil engineering at Chamran University, Ahvaz. In 1992, after completing his bachelor's degree, he pursued a master's degree in the same subject at Tabriz University and finished his master studies by 1994. In 2012, he obtained a Ph.D. in civil engineering from Chamran University, Ahvaz.

Subsequently, he joined the faculty members of Chamran University in Ahvaz, where he started to teach. He also taught as lecturer at Islamic Azad Universities in the cities of Shoushtar, Dezful, and Ahvaz. His professional background also includes working within Iran's Construction Engineering Organization and serving as the head of the Engineering Organization in Andimeshk County. Abbas Akhundi, the former Minister of Roads and Urban Development, stated that the violations have been taking place in Iranian Construction Engineering Organization for more than 14 years and have become established practices with vested interests, and the victims are professional engineers and people.

State media in Iran refer to Khademi as a "warrior during Iran's war with Iraq" and an "official member of the Islamic Revolutionary Guard Corps."

Kheirollah Khademi has an extensive executive history in the Islamic regime of Iran. Beginning from 2001, he served as the mayor of Andimeshk for three years. Afterward, he assumed provincial responsibilities and held the position of the Director-General of Roads and Transportation in Khuzestan Province for five years, starting from 2004. Subsequently, in 2009, Khademi was promoted to the position of Deputy for Civil Affairs in Khuzestan Province, where he served for approximately two years.

However, in 2011, Kheirollah Khademi's executive responsibilities expanded beyond Khuzestan Province to the national level. Consequently, he joined the "Iran Construction and Development of Transportation Infrastructure Company" initially as a board member and later as its CEO. This presence within the company paved the way for his role as Deputy Minister of Roads and Urban Development. With the approval of the Cabinet of Ministers in June 2022, the "Iran Construction and Development of Transportation Infrastructure Company" became a 100% state-owned enterprise.

3. Suspected Kleptocratic Connections and Activities

The investigation into Kheirollah Khademi's activities reveals several points of concern regarding potential corrupt practices:

1. **Allegations of corruption in the distribution of bitumen**:

- Allegations of corruption in the distribution of free bitumen, with government officials suspected of colluding with bitumen producers and falsifying documents.

- Reports from various Iranian security agencies indicated that the abuses resulted in unfinished infrastructure projects and financial burdens for the government.

- Despite Khademi's denials, there have been no significant developments or detailed reports on these corruption allegations.

There have been reports of government corruption in Iran, particularly related to bitumen (an oil-based substance used in asphalt). In January 2022, Iranian state media exposed cases of corruption in this sector.

In this context, a member of the Islamic Consultative Assembly of Iran revealed the prevalence of extensive corruption and rent-seeking practices in the distribution of free bitumen. He pointed out that "some government officials collaborated with bitumen producers and engaged in document forgery to fraudulently obtain free bitumen".

Kamal Alipour, citing reports from various Iranian security agencies, revealed that some government managers colluded with bitumen producers to obtain free bitumen through fraudulent documentation, and that this malpractice led to a number of problems, including unfinished infrastructure projects, unwarranted financial burdens on the government, and as a result, widespread misallocation of the country's public resources.

In addition, he noted that the distribution of free bitumen, which amounted to only half a million tons in 2013, took a more serious and worrisome turn starting in 2015, as the annual allocation of free bitumen steadily increased.

Kheirollah Khademi, however, strongly denied these allegations and called for a thorough investigation to determine the exact locations and individuals involved in these corrupt practices.

In April 2022, Iranian state media published a letter attributed to Rostam Qasemi, the minister of roads and urban development at the time. In the letter, Qasemi addressed Kheirollah Khademi, four other government administrators, and regional officials responsible for

transportation and urban development, warning them of systemic corruption within the country's transportation system and demanding explanations.

In the letter, Qasemi pointed out that some bitumen production companies were involved in questionable practices, including the substitution of lower quality imported bitumen for higher quality domestically produced bitumen, which adversely affected the quality of roads.

However, the corruption case related to bitumen distribution did not lead to any significant developments, and therefore no special reports on the main factors contributing to this corruption and rent-seeking behavior were disseminated in the Iranian state media. Nevertheless, the issue of corruption in the bitumen industry and its connection to Kheirollah Khademi occasionally resurfaces in Iranian media discussions.

In November 2021, the significant increase in bitumen prices once again drew attention to corruption in the bitumen industry. In response to a question about corruption in bitumen distribution, Kheirollah Khademi said, "I am not involved in this matter; the construction company is just a bitumen consumer. I cannot confirm any corruption in this regard."

In April 2023, an Iranian state media outlet referred to Kheirollah Khademi as "the man for all governments or the sultan of construction" who consistently maintains strong ties with powerful political figures and members of the Islamic Consultative Assembly. The report also criticized Khademi's performance, stating that the annual construction of about 200 kilometers of railroad in Iran is proceeding at a pace similar to that of a tortoise.

2. Ties to the IRGC and influential political figures:

- Khademi's close ties to senior Islamic Revolutionary Guard Corps (IRGC) commanders and figures such as Parviz Fattah, who is under U.S. sanctions.

- His association with the construction of the Karkheh Dam, which was carried out by an IRGC-affiliated group, and his public praise of Qasem Soleimani, an IRGC commander.

In recent years, Kheirollah Khademi's name has been suggested for various positions. For example, during the presentation of Ebrahim Raisi's cabinet, the possibility of Kheirollah Khademi becoming the minister of roads and urban development was heard. Years ago, he was also one of the potential candidates for the position of CEO of Khuzestan's Water and Electricity Organization. Iranian state media reported that Parviz Fattah had suggested that Kheirollah Khademi be appointed to the post. This once again underscores Khademi's close relationship with senior commanders of the Islamic Revolutionary Guard Corps (IRGC), as Parviz Fattah is considered one of the most prominent figures within the IRGC. For example, Fattah served as the CEO of the IRGC Cooperative Foundation from 2009 to 2015, and as of November 2020, he is subject to U.S. Treasury sanctions. Parviz Fattah is one of the trusted

managers of Ayatollah Ali Khamenei, the Supreme Leader of Iran's Islamic regime. Fattah took charge of the Imam Khomeini Relief Foundation for four years beginning in April 2015 by decree of Ayatollah Ali Khamenei. On October 27, 2023, he was appointed by Ayatollah Ali Khamenei's decree as the head of the Execution of Imam Khomeini's Order.

All of the above indicates that Kheirollah Khademi is highly trusted within the Islamic Republic system as one of the executive managers, especially at the higher levels of the Islamic Revolutionary Guard Corps (IRGC), by Ali Khamenei, the Supreme Leader of the Islamic Republic, and his appointees.

The Islamic regime's state media have also reported that Kheirollah Khademi was one of the senior executives involved in the construction of the Karkheh Reservoir Dam. This dam, located about 25 kilometers northwest of Andimeshk in Khuzestan Province, was built by the SEPASAD group, which is affiliated with the IRGC's Khatam al-Anbiya headquarters. Sepasad was established in November 1992 under the registration number 93721 and is mainly active in the fields of water, roads and buildings, industry and mining, and transportation.

In a message commemorating the anniversary of the killing of Qasem Soleimani, the former commander of the IRGC's Quds Force, by the United States in January 2020, Khademi praised him, calling Soleimani a "pious commander" and a "faithful mujahid" whose "service had no limits".

In many interviews, Khademi has stated that the implementation of the country's transportation projects requires the involvement of companies affiliated with the Islamic Revolutionary Guard Corps (IRGC), particularly the Khatam al-Anbiya Headquarters. For example, in September 2022, he announced that the contractual issue of the railway project in Lorestan Province was resolved with the help of the Khatam al-Anbiya Headquarters, and the project's funding was also entrusted to the same headquarters.

Khademi also worked in the Ministry of Roads and Urban Development during Ebrahim Raisi's administration as Rostam Ghasemi's deputy. Rostam Ghasemi, who died in December 2022, was a well-known member of the IRGC and the Quds Force. Beginning in January 2008, he served as commander of the Khatam al-Anbiya Headquarters for four years and played a major role in circumventing international sanctions against the Islamic regime. Ghasemi has also been linked to various corruption cases in the oil and petrochemical industries and has been sanctioned by Europe and the United States.

3. International cooperation with potential conflicts of interest:

- Negotiations with Chinese companies for major infrastructure projects such as the Tehran-Shomal highway and the Shiraz-Bushehr railway, raising questions about the transparency and terms of these deals.

- Involvement in the Zahedan-Chabahar railway project with India, which faced delays and eventual withdrawal by India, highlighting potential mismanagement or corruption.

- Announcements of increased cooperation with Russia on railway construction, with details of these negotiations remaining confidential.

Kheirollah Khademi is one of the Iranian officials who has repeatedly reported on the development of collaborations between Iran and China, particularly in the field of transportation and railways.

For instance, in February 2018, he announced that the completion of the Tehran-Shomal Freeway was awaiting an agreement and cooperation between the Foundation of the Oppressed and Disabled (Bonyad-e Mostazafan va Janbazan) of Islamic Revolution of Iran and Chinese companies. In April 2021, Khademi revealed intensive negotiations with the Chinese for the completion of this freeway, stating that Iran was in negotiations with five Chinese companies, and negotiations with one of these companies were very serious. These negotiations eventually yielded results, and in July 2023, Iran officially announced that the third section of the Tehran-Shomal Freeway would be constructed with the participation of the Chinese.

In March 2018, in the presence of Kheirollah Khademi, Iran's Minister of Roads and Urban Development, alongside a representative of a Chinese company, the investment and cooperation agreement with the Chinese company Sinconst for the construction of a 450-kilometer railway from Shiraz to Bushehr, with a contract value of $700 million was signed. Khademi officially declared that he had been engaged in negotiations with Chinese parties for several months leading up to the signing of this agreement.

In general, Khademi and all the other officials of the Islamic regime of Iran were hopeful that after the 2015 nuclear agreement between Iran and Western powers, cooperation between Tehran and Beijing in various fields would significantly expand. Chinese officials were also welcoming of this cooperation and the development of bilateral relations. One of these expressions of interest was made by a representative of a Chinese company in August 2017 during a meeting with Khademi, stating that China, after the lifting of sanctions against Iran, had a greater desire for cooperation with the Islamic Republic of Iran. The Chinese representative emphasized that China was especially interested in participating in the construction of Iran's transportation infrastructure.

In March 2021, a 25-year cooperation agreement between Iran and China was signed. Officials of the Islamic regime stated that China would invest up to $400 billion in Iran, averaging around $16 billion annually. Reports at the time indicated that out of this amount, $280 billion would be invested in the oil and gas industry, and $120 billion would be allocated to the transportation industry. However, statistics show that China's actual investment in Iran is much lower than these figures. This should be primarily due to the continuation of sanctions against Iran and the lack of a comprehensive nuclear agreement between Tehran and Western countries. It seems highly unlikely that China would invest $400 billion annually in Iran. Additionally, detailed information about the 25-year agreement between Iran and China has not been publicly disclosed, raising concerns among many civil society activists and the general public about the terms of this cooperation and potential disregard for Iran's national interests.

According to a study done December 2022, China's trade with the United States and the European Union had surged to $640 billion and over $800 billion, respectively, within the first ten months of 2022, which is equivalent to a quarter of China's total trade with the whole world.

China's trade with Iran stands at a mere $13 billion, accounting for just under two-tenth of one percent of China's foreign trade.

Iran is actively working on expanding the infrastructure associated with the North-South railway corridor, aiming to create a smoother route for transporting goods between Central Asia, Russia, and the Persian Gulf region.

Throughout all these years, Khademi has maintained a close working relationship with various Chinese companies. In late August 2023, he announced that China was fully prepared to continue financing the high-speed train project connecting Tehran, Qom, and Isfahan. Khademi emphasized that this financial commitment was substantial, but China was willing to take on the responsibility. He defended the collaboration with China, noting that China's high-speed train technology surpasses that of any other nation, with the longest high-speed rail network in the world.

Kheirollah Khademi has also developed extensive contacts with officials from other countries that cooperate with Iran. One such country is India. In November 2017, Iranian media reported on Khademi's meeting with India's ambassador to Iran, Saurabh Kumar. The two met at the Transport Infrastructure Development Company, where they discussed potential areas of cooperation between India and the company.

During the meeting, Khademi referred to his trip to India and also to Russia and said that during his trip to Russia, "the transit of goods from India to Russia through the North-South Corridor was emphasized. The North-South Corridor is currently operational, connecting

Iranian cities from Bandar Abbas to Qazvin, and Iranian authorities plan to activate additional routes within the country soon.

However, economic and political relations between the Islamic Republic of Iran and India have had their ups and downs. For example, in July 2020, Kheirollah Khademi officially announced that India had withdrawn from the Zahedan-Chabahar railway project in Iran, citing a three-year delay on the Indian side as the main reason. The agreement for the construction of this railway was signed during Indian Prime Minister Narendra Modi's visit to Tehran in May 2016, with an estimated value of over $1.6 billion. It is important to note that this railway project is not unrelated to Russia, as its main goal is to connect Chabahar, Iran's only seaport, to the Afghan border and the railway network in the northeast of the country, with the aim of connecting to Russia and Central Asian countries.

The footprint of the Islamic Revolutionary Guard Corps (IRGC) can also be seen in this project. The Khattam al-Anbiya Headquarters, which is affiliated with the IRGC, has been involved in part of the project since 2013, covering about 730 kilometers between the cities of Chabahar and Iranshahr.

This project enjoys significant support from the Islamic Revolutionary Guard Corps (IRGC), with the personal backing of Ali Khamenei, the Supreme Leader of the Islamic regime: in September 2019, with Ali Khamenei's approval, 300 million euros from Iran's National Development Fund were allocated to this project so that Khattam al-Anbiya Headquarters could begin its work on this project.An overview of Kheirollah Khademi's interviews and statements shows that he is one of the most prominent officials of the Islamic Republic when it comes to the development of Tehran-Moscow relations. He has officially announced many matters related to the expansion of Iran-Russia cooperation, especially in the field of transportation.

In January 2023, Khademi, referring to the visit of the Russian president's special assistant to Iran, announced Russia's interest in cooperating in the construction of the 162-kilometer Rasht-Astara railway and said Moscow had proposed a comprehensive transit plan for Iran in this regard. He added that extensive high-level negotiations had taken place between Tehran and Moscow on this cooperation. In September 2023, Khademi reported the signing of an agreement between Iran and Russia on the construction of this railway, stressing that Iran did not face any difficulties in negotiations with Russia.

In October 2023, Kheirollah Khademi received Yuri Kozmin, the CEO of Caspian Services, and his accompanying delegation from Russia in Iran to finalize the implementation plans for the Rasht-Astara railway. According to Iranian authorities, the Rasht-Astara Railway will connect Iran with the Republic of Caucasus, Russia and Northern Europe by rail. It will also facilitate trade between Iran's southern ports and the ports of Helsinki-Finland, Hamburg-Germany, Batumi-Georgia, Delh-India, Karachi-Pakistan, and Bangkok-Thailand.

In August 2023, Kheirollah Khademi pointed out that Iran's railways currently transport 50 million tons of goods annually over a distance of 14,000 kilometers. He said that with the inclusion of Russian goods, Iran's rail exports will increase to 150 million tons, effectively tripling Iran's rail exports in cooperation with Russia.

However, not all details of Kheirollah Khademi's negotiations and interactions with the Russian parties are made public. For example, Khademi officially mentioned in January 2023 that the details of the negotiations with the Russians regarding their participation in Iran's railroads are considered "confidential".

Leading one of Iran's most important transportation companies

Kheirollah Khademi, with the identification number 4071366801, rose from provincial responsibilities in Khuzestan to national responsibilities during the administration of Mahmoud Ahmadinejad. On December 13, 2016, he was appointed by the Minister of Roads and Urban Development as the Chief Executive Officer of "Iran Construction and Development of Transportation Infrastructure Company (CDTIC)". This company, which was registered in June 2004 under the number 75991, was established in Tehran by merging three ministry deputy offices, including the deputy office for roads and urban development, the deputy office for railway construction and development, the deputy office for port and airport construction and development, as well as the free road construction department and the machinery procurement company.

Iran Construction and Development of Transportation Infrastructure Company is one of Iran's most important state-owned companies in the transportation sector. Any management changes within the organization require the approval of the president. However, reports indicate unfavorable economic conditions within the company. Among the worrying reports is Kheirollah Khademi's announcement on December 19, 2019, that the company has accumulated debts of nearly 2.5 trillion tomans.

Kheirollah Khademi has been the CEO of this company for about seven years, while also serving as the deputy minister of roads and urban development.

Khademi's Perspective in the Structure of the Islamic Republic

State media and government websites in the Islamic Republic regularly publish numerous reports on Kheirollah Khademi's travels. In recent years, during the presentation of cabinet members to the Islamic Consultative Assembly (the parliament), many reports have mentioned Khademi as a potential candidate for the Ministry of Roads and Urban Development.

As Deputy Minister of Roads and Urban Development, Khademi also has very close ties with members of the Islamic Consultative Assembly. Many members of this assembly came into office promising to build and repair roads, both urban and rural, and thus require close ties to the CEO of the Iran Construction and Development of Transportation Infrastructure Company (CDTIC).

Khademi continues to make decisions and speeches as the "authorized representative of the Minister of Roads and Urban Development" during many provincial trips. This indicates that Khademi effectively functions as the shadow minister of roads and urban development in the Islamic Republic, and the power shifts between the so-called reformist and conservative

factions during changes of government do not significantly change his position. A fact that is related to his close relationship with the Revolutionary Guard Corps and Ali Khamenei's appointees.

Standard for judging actions as corrupt:

- In Iran, actions that involve misuse of public office for personal gain, manipulation of state resources, or collusion with private entities for illicit gain are typically considered corrupt.

- Legal violations would include forgery, embezzlement of public funds, and abuse of power. For example, according to the proposal No. 88/16/K dated 05/6/2003, the presidential body based on Article 138 of the Constitution of the Islamic Republic of Iran approved the implementation of the "Program for Improving the Administrative System and Combating Corruption".

- Culturally, such behavior is a significant departure from the expectations of integrity and transparency expected of public officials, especially those in influential positions such as Khademi's.

Khademi's activities raise concerns about patterns of corruption and suggest that benefits extend beyond him to other members of the political and military elite. The close ties to the IRGC and influential political figures suggest the use of connections for potentially illicit gain. The lack of transparency and accountability in his dealings, particularly in high-value projects, is inconsistent with Iranian legal standards and cultural norms for ethical governance. The investigation into Kheirollah Khademi's activities reveals several points of concern regarding potential corrupt practices

4. Significance

Kheirollah Khademi's public reputation, based on the information provided, can be characterized as follows:

1. Public Reputation and Recognition:

- Khademi is a well-known figure in Iran, particularly in the areas of transportation and urban development. His long tenure as CEO of the Iran Construction and Development of Transportation Infrastructure Company (CDTIC) and as Deputy Minister of Roads and Urban Development has made him a prominent name in these sectors.

- He is often associated with major infrastructure projects and has played a key role in negotiations and cooperation with major international partners such as China and Russia.

2. Perception of connections with political and military elite:

- Khademi is widely known for his close ties to influential political and military figures, particularly within the Islamic Revolutionary Guard Corps (IRGC). His relationships with senior commanders and endorsements from powerful figures such as Supreme Leader Ali Khamenei's appointees have been a notable aspect of his public persona.

- His public praise of Qasem Soleimani and his involvement in projects linked to the IRGC contribute to his image as an individual deeply integrated into Iran's political and military establishment.

3. Newness of Findings:

- The findings of alleged corrupt activities, particularly in the distribution of bitumen, may add a new dimension to his public image.

- The details of his international negotiations and potential conflicts of interest, particularly with Chinese and Russian companies, may also be relatively new information that could influence public opinion.

4. Compliance or Defiance of Public Expectations:

- The alleged involvement in corruption and close ties to the IRGC may conform to a certain public expectation or stereotype about officials in similar positions in Iran, where concerns about corruption and politico-military entanglements are not uncommon.

- However, if these allegations differ substantially from the existing public perception of Khademi as a competent and dedicated public servant, they could significantly alter his reputation.

In summary, Kheirollah Khademi is a well-known figure in Iran's transportation and urban development sectors, recognized for his enduring role and connections with the political and military elite. The findings regarding potential corrupt activities and international dealings could either reinforce existing perceptions or add new layers to his public image, depending on the extent to which these aspects were previously known or discussed in public discourse.

II. Methodology

1. Sources Utilized

Here's an overview of the sources and methods:

1. Open-Source Media and News Outlets:

- Utilized various international and regional news websites, both accessible and restricted within Iran, for current events and historical context.

- Methods: Browsing news websites, using VPNs where necessary to access restricted content within Iran.

2. Social Media Platforms:

- Platforms like Twitter, Facebook, and LinkedIn were used for public opinions, expert insights, and official statements.

- Technical Means: Data scraping tools for aggregating and analyzing public posts, comments, and trends related to Khademi and CDTIC.

- Note: Social media analysis was limited to publicly available information to respect privacy and ethical considerations.

3. Financial and Industry Reports:

- Reports from financial analysis firms, industry journals, and economic databases provided insights into the financial operations of CDTIC and the bitumen industry. The purpose of this research is to find out which entities are the contractors of the projects. How are the projects financed? For example, part of the financial resources of transportation projects comes from oil clearing, which is itself a source of corruption.

- Methods: Online subscriptions to financial databases and industry report repositories.

4. Legal Documents:

- Analysis of Iranian legal documents and international conventions to understand the legal framework and potential violations.

- Sources: Online legal databases, law libraries, and official government websites. We looked for evidence of corruption in the transport system in the legal document. We also tried to evaluate the discrepancies and violations and also to find the authorizations that allow corruption.

5. Academic Publications and Think Tanks:

- Utilized for in-depth analyses and expert perspectives on Iranian politics, economics, and infrastructure development.

- Methods: Accessing academic journals and think tank publications online.

6. Government Publications and Archives:

- Reviewed official government releases, speeches, and historical documents related to Khademi and CDTIC.

- Methods: Accessing online archives and official government platforms.

7. Excluded Sources:

- Propaganda or overtly biased media sources were excluded to maintain research integrity.

- Unverifiable or anonymous online sources without corroboration were also avoided to ensure accuracy.

2. Source Limitations

Here are the key areas where additional information would be valuable:

1. Detailed Financial Records and Transactions:

- Access to comprehensive financial statements, bank records, and transaction histories of Khademi and the CDTIC would provide concrete evidence of financial irregularities or misappropriation.

- Information on offshore accounts or financial dealings with foreign entities could be particularly revealing.

2. Internal Communications and Documents:

- Internal memos, emails, or correspondence within CDTIC or between Khademi and other government officials or IRGC commanders could reveal the nature of their relationships and potential corrupt practices.

- Documents related to tender processes, contract awards, and negotiations for major infrastructure projects could expose irregularities or favoritism.

3. Whistleblower Testimonies: Testimonies or disclosures from insiders, former employees, or whistleblowers who have direct knowledge of corrupt practices or kleptocratic networks within the CDTIC or government.

4. Legal and Audit Reports: Access to internal or government audits of CDTIC and related projects could reveal discrepancies or mismanagement.

Support from Other Investigative Teams and In-Country Contacts:

1. Collaboration with Local Journalists and Activists:

- Local journalists and activists, who may have access to sources and information not available to external researchers, could provide valuable insights.

- They could also assist in navigating the local context and understanding the nuances of Iranian politics and business practices.

2. Use of Advanced Data Analysis Techniques: Collaborating with teams skilled in forensic accounting and data analysis to scrutinize financial records or transaction histories for irregular patterns.

3. Engagement with Legal Experts: Consulting with legal experts familiar with Iranian law and international anti-corruption statutes could help in interpreting findings and understanding the legal implications.

4. Alternative Methodologies: Utilizing undercover investigative techniques, where safe and ethical, to gather information from within the CDTIC or related entities.

Safety and Ethical Considerations:

- Any in-country support must prioritize the safety and security of those involved, given the potential risks in investigating government-linked corruption in Iran.

- Ensuring that all methodologies employed adhere to ethical standards and legal frameworks, especially in the context of whistleblower protection and data privacy.

III. Appendix

This section Includes any substantial charts, maps, or other visuals. Especially useful would be a network map placing the target within key kleptocratic networks, including institutional elements, such as the justice sector or a specific military unit, business entities, crime gangs, as well as key individual contacts belonging to any of those institutions or entities. Also useful would be a geographical map of relevant activities, as appropriate, including population groups most likely to be adversely affected, or physical proximity of a headquarters, for example, to a key government office

Assign a letter to the given image, in descending alphabetical order, which may then be referenced – wherever relevant – in the main text. For example: "(See Appendix A)."

A. Title (Include one-sentence caption) (Persian)

1. Who is the Minister of Roads and Urban Development?: Link

2. A conversation with the CEO of the transportation infrastructure construction and development company : Link

3. Parviz Fattah became the head of executive staff of Farman Imam: Link

4. "Spasad" group : http://sepasad.ir/

5. Publishing a message on the occasion of Qassem Soleimani from the CEO of the Transportation Infrastructure Construction and Development Company: Link

6. 40-month deadline to complete the railway: Link

7. The new revelation of the Minister of Roads: Link

8. Why the increase in the price of bitumen in the country?: Link

9. Construction of the third zone of Tehran-North Freeway with the participation of China: https://irna.ir/xjMRYq

10. China's readiness to continue financing Tehran-Isfahan high-speed train: Link

11. The Russians have 6 months to present the Rasht-Astara railway map : Link

12. Signing of the executive plans of the Rasht-Astara railway between Iran and Russia :Link

13. Iran's rail exports in cooperation with Russia : Link

14. The details of the Russian investment are confidential : Link

15. United Nations Convention to Combat Corruption https://www.cilamag.ir/article_17990_18481e7dd3b6bdf169f84c31de4bc1b5.pdf

16. Getting to know the laws against corruption : Link

17. Iran's accession to the United Nations Convention against Corruption

18. https://dolat.ir/detail/172703

19. Anti-trafficking law : Link

20. Photo of the Khademi family

21. https://s3.amazonaws.com/bala.static/links/e3901486-cea9-4e43-bcee-0c11b0c07c0d.jpg

22. 8th International Conference on Recent Advances in Railway Engineering : Link

23. Systematic corruption in the construction engineering system : Link

24. 5.9 billion from oil sales to complete rail corridors : Link

25. Road, Housing and Urban Development Research Center's assessment of the competence of the executive agents of road construction projects : Link