

BIDEN, CONGRESS SHOULD DEFEND TERRORISM SANCTIONS IMPOSED ON IRAN

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During a Senate Foreign Relations Committee hearing to consider Antony Blinken's nomination for secretary of state, Blinken was asked whether he believed it is in America's national security interest to lift terrorism sanctions currently imposed on Iran, including sanctions targeting Iran's central bank, national oil company, financial sector, and energy sector. "I do not," Blinken responded. "And I think there is nothing, as I see it, inconsistent with making sure that we are doing everything possible – including the toughest possible sanctions, to deal with Iranian support for terrorism."¹

Bipartisan support for terrorism sanctions targeting Iran goes back to 1984, when the United States first designated the Islamic Republic as a State Sponsor of Terrorism. Since then, every U.S. president² – Republican or Democrat – and Congress have taken steps to reaffirm U.S. policy opposing Iran's sponsorship of terrorism and tying sanctions relief to Iran's cessation of terror-related activities.

President Joe Biden has pledged to rejoin the 2015 Iran nuclear deal, formally known as the Joint Comprehensive Plan of Action (JCPOA), if Iran returns to "strict compliance" with the agreement.³ Terrorism sanctions on Iran, however, should not be lifted, even if the Biden administration opts to return to the deal, unless and until Iran verifiably halts its sponsorship of terrorism.

This memorandum provides an overview of Iran's past and ongoing involvement in terrorism-related activities, a review of longstanding bipartisan congressional support for terrorism sanctions on Iran, and a list of terrorism sanctions currently imposed on Iran that should not be lifted.

IRAN'S SPONSORSHIP OF TERRORISM

In its latest annual country report on terrorism, the Department of State reaffirmed Iran's wide range of terror-related activities. Hezbollah, a designated foreign terrorist organization since 1997, remains Iran's "primary terrorist

1. Secretary of State-designate Antony Blinken, *Testimony before the Senate Committee on Foreign Relations*, January 19, 2021. (<https://www.foreign.senate.gov/hearings/nominations-011921>)

2. U.S. Department of State, Bureau of Counterterrorism, "State Sponsors of Terrorism," accessed January 19, 2021. (<https://www.state.gov/state-sponsors-of-terrorism>)

3. Vice President Joe Biden, "Joe Biden: There's a smarter way to be tough on Iran," CNN, September 13, 2020. (<https://www.cnn.com/2020/09/13/opinions/smarter-way-to-be-tough-on-iran-joe-biden/index.html>)

proxy group.” The Islamic Republic also provides support to a number of Palestinian terrorist groups, including Hamas, Palestine Islamic Jihad, and the Popular Front for the Liberation of Palestine-General Command.⁴

According to State, Iran uses the Islamic Revolutionary Guard Corps-Quds Force (IRGC-QF) “to provide support to terrorist organizations, provide cover for associated covert operations, and create instability in the region.” The IRGC-QF moves weapons to Hezbollah through Iraq and Syria⁵ while providing arms and training for Yemen-based terrorist attacks by the Houthis. Iran has also plotted attacks against dissidents on European soil, including in Denmark, France, the Netherlands, Belgium, and Albania.⁶

Over the years, Iran has sponsored several high-profile terrorist attacks targeting Americans and Jews, including the bombing of the U.S. Embassy and Marine barracks in Beirut (1983), the Jewish community center of Buenos Aires (1994), and the Khobar Towers in Saudi Arabia (1996). Iran’s chief proxy, Lebanese Hezbollah, was behind a 2012 bus bombing that killed five Israeli civilians and one Bulgarian in Burgas, Bulgaria.⁷ According to the U.S. Department of Defense, the IRGC is responsible for the murders of at least 603 U.S. troops in Iraq.⁸

The State Department also reports that “Iran has allowed [al-Qaeda] facilitators to operate a core facilitation pipeline through Iran since at least 2009, enabling [al-Qaeda] to move funds and fighters to South Asia and Syria.”⁹ The department recently announced a reward for information that brings to justice Iran-based al-Qaeda leader Muhammad Abbatay.¹⁰

CONGRESSIONAL SUPPORT FOR TERRORISM SANCTIONS ON IRAN

Just weeks after an Iran-sponsored terrorist attack on a U.S. military complex in Saudi Arabia in 1996, President Bill Clinton signed the Iran Libya Sanctions Act (ILSA) into law.¹¹ In 2010, President Barack Obama signed the Comprehensive Iran Sanctions, Accountability, and Divestment Act (CISADA) into law.¹² Both ILSA and CISADA specifically tied their termination criteria to Iran’s cessation of terrorism sponsorship – and both received overwhelming bipartisan support in both chambers of Congress.

4. U.S. Department of State, Bureau of Counterterrorism, “Country Reports on Terrorism 2019: Iran,” June 25, 2020. (<https://www.state.gov/reports/country-reports-on-terrorism-2019/iran>)

5. See: David Adesnik and Behnam Ben Taleblu, “Burning Bridge: The Iranian Land Corridor to the Mediterranean,” *Foundation for Defense of Democracies*, June 2019. (<https://www.fdd.org/wp-content/uploads/2019/06/fdd-report-burning-bridge.pdf>)

6. U.S. Department of State, Bureau of Counterterrorism, “Country Reports on Terrorism 2019: Iran,” June 25, 2020. (<https://www.state.gov/reports/country-reports-on-terrorism-2019/iran>)

7. “Bulgaria court convicts two over 2012 Burgas bus attack on Israelis,” *BBC News* (UK), September 21, 2020. (<https://www.bbc.com/news/world-europe-54240101>)

8. Kyle Rempfer, “Iran killed more US troops in Iraq than previously known, Pentagon says,” *Military Times*, April 4, 2019. (<https://www.militarytimes.com/news/your-military/2019/04/04/iran-killed-more-us-troops-in-iraq-than-previously-known-pentagon-says>)

9. U.S. Department of State, Bureau of Counterterrorism, “Country Reports on Terrorism 2019: Iran,” June 25, 2020. (<https://www.state.gov/reports/country-reports-on-terrorism-2019/iran>)

10. U.S. Department of State, Rewards for Justice, “Wanted: Information that brings to Justice Muhammad Abbatay (‘Abd al-Rahman al-Maghrebi),” accessed January 19, 2021. (https://rewardsforjustice.net/english/muhammad_abbatay.html)

11. Alison Mitchell, “Clinton Signs Bill Against Investing in Iran and Libya,” *The New York Times*, August 6, 1996. (<https://www.nytimes.com/1996/08/06/world/clinton-signs-bill-against-investing-in-iran-and-libya.html>)

12. Comprehensive Iran Sanctions, Accountability, and Investment Act of 2010, Pub. L. 111-195, 124 Stat. 1312, codified as amended at 22 U.S.C. §8501. (<https://www.congress.gov/111/plaws/publ195/PLAW-111publ195.pdf>)

In 2015, following the Obama administration's negotiation of the JCPOA, the House and Senate passed the Hizballah International Financing Prevention Act without opposition. Though the bill mandated sanctions on the financial and logistics networks of Iran's largest terrorist proxy, Obama signed it into law.¹³

In 2017, the House passed the Countering America's Adversaries Through Sanctions Act by a vote of 419-3.¹⁴ No House Democrat voted against the legislation, which mandated sanctions on entities connected to the IRGC and compelled the Trump administration to designate the IRGC as a terrorist entity.¹⁵ The legislation cleared the Senate by a vote of 98-2.¹⁶ An earlier Senate version, the Countering Iran's Destabilizing Activities Act of 2017, chiefly co-sponsored by Senator Robert Menendez (D-NJ), passed by the same margin.¹⁷ Notably, these votes took place while the United States remained a participant in the JCPOA.

In 2018, despite disagreements in Congress over the Trump administration's decision to cease America's participation in the JCPOA, the House and Senate passed the Hizballah International Financing Prevention Amendments Act by unanimous consent – further ensnaring Iran's terror-finance channels to Hezbollah in a web of mandatory U.S. sanctions.¹⁸

WHY TERRORISM SANCTIONS ON IRAN MATTER TODAY

Understanding the historical role Congress played in enacting and overseeing the implementation of terrorism sanctions on Iran and its proxies is increasingly important today as Biden pledges to rejoin the JCPOA if Iran returns to its commitments under the agreement – a pledge made notwithstanding the fact that the deal has already begun to expire and that Iran is under investigation for concealing undeclared nuclear activities.¹⁹

Congress should send a bipartisan message to the Biden administration that regardless of where members may stand on the JCPOA, the overwhelming majority agrees that no terrorism-sanctions relief should be provided to Iran. Such a policy stance would be in line with Blinken's testimony before the Senate Foreign Relations Committee and a previous commitment he made during the 2020 campaign: "[W]e will continue non-nuclear sanctions as a strong

13. Hizballah International Financing Prevention Act of 2015, Pub. L. 114-102, 129 Stat. 2205, codified as amended at 50 U.S.C. §1701. (<https://www.congress.gov/114/plaws/publ102/PLAW-114publ102.pdf>)

14. U.S. House of Representatives, Office of the Clerk, "Roll Call 413 | Bill Number: H. R. 3364," July 25, 2017. (<https://clerk.house.gov/Votes/2017413>)

15. Countering America's Adversaries Through Sanctions Act of 2017, Pub. L. 115-44, 131 Stat. 892, codified as amended at 22 U.S.C. §9404. (<https://www.congress.gov/bill/115th-congress/house-bill/3364>)

16. U.S. Senate, "Roll Call Vote 115th Congress - 1st Session," July 27, 2017. (https://www.senate.gov/legislative/LIS/roll_call_lists/roll_call_vote_cfm.cfm?congress=115&session=1&vote=00175#position)

17. U.S. Senate, "Roll Call Vote 115th Congress - 1st Session," June 15, 2017. (https://www.senate.gov/legislative/LIS/roll_call_lists/roll_call_vote_cfm.cfm?congress=115&session=1&vote=00147#position)

18. Hizballah International Financing Prevention Amendments Act of 2018, Pub. L. 115-272, 132 Stat. 4144, codified as amended at 50 U.S.C. §1701. (<https://www.congress.gov/115/plaws/publ272/PLAW-115publ272.pdf>)

19. Vice President Joe Biden, "Joe Biden: There's a smarter way to be tough on Iran," CNN, September 13, 2020. (<https://www.cnn.com/2020/09/13/opinions/smarter-way-to-be-tough-on-iran-joe-biden/index.html>); Andrea Stricker, "The JCPOA May Not See Its Five-Year Anniversary," *Foundation for Defense of Democracies*, May 6, 2020. (<https://www.fdd.org/analysis/2020/05/06/jcpoa-may-not-see-five-year-anniversary>); Richard Goldberg, "Let This Be a Warning to Biden: Iran Has Been Cheating This Whole Time," *Foundation for Defense of Democracies*, November 27, 2020. (<https://www.fdd.org/analysis/2020/11/27/let-this-be-a-warning-to-biden-iran-cheating>)

hedge against Iranian misbehavior in other areas.”²⁰ Indeed, the Obama White House itself pledged that under the JCPOA, “non-nuclear sanctions (such as for terrorism) must remain in effect and be vigorously enforced.”²¹

During the debate over the JCPOA in 2015, the Obama administration referred to the sanctions relief provided to Iran under the agreement as “nuclear sanctions” – using the ambiguity of congressionally enacted sanctions to deliver broad sanctions relief to Iran. In 2021, however, this sleight of hand is no longer possible. While the Treasury and State departments have designated entities connected to Iran’s nuclear program under Executive Order 13382 (relating to weapons of mass destruction), they have also specifically designated key sectors, entities, and individuals in Iran based on non-nuclear conduct²² – whether for involvement in missiles, human rights violations, or terrorism – including designations made pursuant to Executive Order 13224 (relating to terrorism).

This memorandum includes specific details and lists of sectors, entities, and individuals currently subject to U.S. sanctions because of their connection to Iran’s sponsorship of terrorism and/or the IRGC. Any sanctions relief provided to Iran that benefits these sectors or entities would constitute terrorism-sanctions relief and would not be in America’s national security interest.

SECTORS OF IRAN’S ECONOMY CONNECTED TO THE IRGC AND/OR TERRORISM

Several sectors of Iran’s economy are permeated by the IRGC and/or help finance Iran’s sponsorship of terrorism. Any sanctions relief provided to these sectors – including the rescission of executive orders, the removal of sector designations, or the issuance of national security waivers pursuant to various Iran sanctions laws – would provide direct budgetary assistance to the IRGC and/or to Iran’s sponsorship of terrorism.

- **Financial Sector:** In late 2019, the Financial Crimes Enforcement Network issued a final rule under Section 311 of the PATRIOT ACT declaring Iran’s financial sector to be a primary jurisdiction of money laundering concern – particularly for terror finance.²³ A draft rule issued during the Obama administration also referenced terrorism and Iran’s support for Hezbollah.²⁴ The Central Bank of Iran and many other Iranian banks are

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20. Jacob Kornbluh, “Tony Blinken’s Biden spiel,” *Jewish Insider*, October 28, 2020. (<https://jewishinsider.com/2020/10/tony-blinkens-biden-spiel>)

21. The White House, “The Iran Nuclear Deal: What You Need to Know About the JCPOA,” accessed January 19, 2021. (https://obamawhitehouse.archives.gov/sites/default/files/docs/jcpoa_what_you_need_to_know.pdf)

22. Other key batches of designations issued pursuant to new executive orders targeted persons appointed to positions of power by the supreme leader of Iran, as well as individuals and entities that support Iran’s arms proliferation and procurement activities. See: Executive Order 13876, “Imposing Sanctions With Respect to Iran,” June 24, 2019. (<https://www.federalregister.gov/documents/2019/06/26/2019-13793/imposing-sanctions-with-respect-to-iran>); Executive Order 13949, “Blocking Property of Certain Persons with Respect to the Conventional Arms Activities of Iran,” September 21, 2020. (<https://www.federalregister.gov/documents/2020/09/23/2020-21160/blocking-property-of-certain-persons-with-respect-to-the-conventional-arms-activities-of-iran>)

23. U.S. Department of the Treasury, Financial Crimes Enforcement Network, “Imposition of Fifth Special Measure against the Islamic Republic of Iran as a Jurisdiction of Primary Money Laundering Concern,” October 24, 2019. (https://www.fincen.gov/sites/default/files/2019-10/Iran%20311%20Final%20Rule_20191025_508.pdf)

24. Finding That the Islamic Republic of Iran Is a Jurisdiction of Primary Money Laundering Concern, U.S. Department of the Treasury, Financial Crimes Enforcement Network, 76 Federal Register 72756, November 25, 2011. (<https://www.govinfo.gov/content/pkg/FR-2011-11-25/pdf/2011-30332.pdf>)

sanctioned due to their support for terrorism.²⁵ The international Financial Action Task Force has also imposed countermeasures on Iran's financial sector for its involvement in financing terrorism.²⁶ Iran's financial sector is subject to sanctions pursuant to Executive Order 13902 as of October 8, 2020.²⁷

- **Energy Sector:** Iran's energy sector has been the target of U.S. sanctions since the 1990s. The IRGC owns and controls companies in the energy sector.²⁸ The National Iranian Oil Company, the National Iranian Tanker Company, Iran's Ministry of Petroleum, and the National Petrochemical Company are sanctioned under terrorism authorities. The IRGC's Khatam-al-Anbia Construction Headquarters (KAA), the largest construction firm in the country, is deeply involved in energy sector projects.²⁹ Sanctions targeting Iran's energy sector include the Iran Sanctions Act,³⁰ Section 1245 of the National Defense Authorization Act for Fiscal Year 2012,³¹ the Iran Threat Reduction and Syria Human Rights Act,³² the Iran Freedom and Counterproliferation Act,³³ and Executive Order 13846.³⁴
- **Construction Sector:** The IRGC is deeply involved in the construction sector.³⁵ The IRGC's KAA is the sector's largest contractor and has engaged in a diverse array of construction activities abroad.³⁶ In addition, the IRGC owns other firms in the sector and considerable real estate assets. Iran's construction sector is subject to sanctions pursuant to Executive Order 13902.³⁷

25. U.S. Department of the Treasury, Press Release, "Treasury Sanctions Iran's Central Bank and National Development Fund," September 20, 2019. (<https://home.treasury.gov/news/press-releases/sm780>)

26. Financial Action Task Force, "High-Risk Jurisdictions subject to a Call for Action – 21 February 2020," February 21, 2020. (<http://www.fatf-gafi.org/publications/high-risk-and-other-monitored-jurisdictions/documents/call-for-action-february-2020.html>)

27. Executive Order 12902, "Imposing Sanctions With Respect to Additional Sectors of Iran," January 10, 2020. (<https://www.federalregister.gov/documents/2020/01/14/2020-00534/imposing-sanctions-with-respect-to-additional-sectors-of-iran>); U.S. Department of the Treasury, Press Release, "Treasury Sanctions Eighteen Major Iranian Banks," October 8, 2020. (<https://home.treasury.gov/news/press-releases/sm1147>)

28. U.S. Department of the Treasury, Press Release, "Treasury Sanctions Key Actors in Iran's Oil Sector for Supporting Islamic Revolutionary Guard Corps-Qods Force," October 26, 2020. (<https://home.treasury.gov/news/press-releases/sm1165>)

29. "Khatam-al Anbiya Construction Headquarters (KAA)," *Iran Watch*, June 1, 2012. (<https://www.iranwatch.org/iranian-entities/khatam-al-anbiya-construction-headquarters-kaa>); U.S. Department of the Treasury, Press Release, "Treasury Sanctions Iran's Largest Petrochemical Holding Group and Vast Network of Subsidiaries and Sales Agents," June 7, 2019. (<https://home.treasury.gov/news/press-releases/sm703>)

30. Iran Sanctions Act of 1996, Pub. L. 104-172, 110 Stat. 1541, codified as amended at 50 U.S.C. §1701. (https://home.treasury.gov/system/files/126/isa_1996.pdf)

31. National Defense Authorization Act of 2012, Pub. L. 112-81, 125 Stat. 1647–1650, codified as amended at 22 U.S.C. §8513a. (https://home.treasury.gov/system/files/126/ndaa_publaw.pdf)

32. Iran Threat Reduction and Syria Human Rights Act of 2012, Pub. L. 112-158, 126 Stat. 1214, codified as amended at 22 U.S.C. §8701–8795. (https://home.treasury.gov/system/files/126/hr_1905_pl_112_158.pdf)

33. National Defense Authorization Act for Fiscal Year 2013, Pub. L. 112-239, 126 Stat. 2004–2005, codified as amended at 22 U.S.C. §8801–8811. (https://home.treasury.gov/system/files/126/pl112_239.pdf)

34. Executive Order 13846, "Reimposing Certain Sanctions With Respect to Iran," August 6, 2018. (<https://www.federalregister.gov/documents/2018/08/07/2018-17068/reimposing-certain-sanctions-with-respect-to-iran>)

35. U.S. Department of the Treasury, Press Release, "Treasury Sanctions Iran's Largest Petrochemical Holding Group and Vast Network of Subsidiaries and Sales Agents," June 7, 2019. (<https://home.treasury.gov/news/press-releases/sm703>)

36. Ali Alfoneh, "EU Delisting of IRGC Construction Giant Will Boost Terror Financing," *Foundation for Defense of Democracies*, July 27, 2015. (<https://www.fdd.org/analysis/2015/07/27/eu-delisting-of-irgc-construction-giant-will-boost-terror-financing>)

37. Executive Order 13902, "Imposing Sanctions With Respect to Additional Sectors of Iran," January 10, 2020. (<https://www.federalregister.gov/documents/2020/01/14/2020-00534/imposing-sanctions-with-respect-to-additional-sectors-of-iran>)

- **Mining, Mineral, and Industrial Metals Sectors:** The IRGC has a significant presence in the mining and industrial metals sectors.³⁸ The IRGC owns firms that are active in mining and processing metals. Several IRGC-owned mining and metal processing companies are currently subject to sanctions.³⁹ Iran's metals and mining sectors are subject to sanctions pursuant to Executive Order 13871 and Executive Order 13902.⁴⁰
- **Automotive Sector:** The IRGC continues to be involved in the automotive sector through cooperation with carmakers in developing technology and producing parts.⁴¹ In December 2019, Iran's Ministry of Defense and Armed Forces Logistics (MODAFL), which is under U.S. sanctions for its support for terrorist groups,⁴² signed a deal with SAIPA (an Iranian automaker) to support the production of automobile parts.⁴³ SAIPA's CEO reportedly said, "With [the] Defense Ministry's help, domestic substitutes for 35 key auto parts are to be produced in Iran to curb the industry's reliance on the global supply chain."⁴⁴ Iran Khodro (another Iranian automaker, branded as IKCO) also inked agreements with eight MODAFL-linked entities that same month.⁴⁵ In November 2020, SAIPA announced it was implementing projects in collaboration with sanctioned entities, including MODAFL and the IRGC Aerospace Force (which oversees Iran's ballistic missile arsenal).⁴⁶ Iran's automotive sector is subject to sanctions pursuant to Executive Order 13846.⁴⁷

38. U.S. Department of the Treasury, Press Release, "Treasury Targets Iran's Billion Dollar Metals Industry and Senior Regime Officials," January 10, 2020. (<https://home.treasury.gov/news/press-releases/sm870>)

39. Saeed Ghasseminejad, "Iranian Companies' Shares Plummeted after Treasury Designations," *Foundation for Defense of Democracies*, November 2, 2018. (<https://www.fdd.org/analysis/2018/11/02/iranian-companies-shares-plummeted-after-treasury-designations>); Saeed Ghasseminejad, "New U.S. Sanctions Omit Key Firms Linked to Iran's Armed Forces," *Foundation for Defense of Democracies*, November 8, 2018. (<https://www.fdd.org/analysis/2018/11/08/new-u-s-sanctions-omit-key-firms-linked-to-irans-armed-forces>)

40. Executive Order 13871, "Imposing Sanctions With Respect to the Iron, Steel, Aluminum, and Copper Sectors of Iran," May 8, 2019. (<https://www.federalregister.gov/documents/2019/05/10/2019-09877/imposing-sanctions-with-respect-to-the-iron-steel-aluminum-and-copper-sectors-of-iran>); Executive Order 13902, "Imposing Sanctions With Respect to Additional Sectors of Iran," January 10, 2020. (<https://www.federalregister.gov/documents/2020/01/14/2020-00534/imposing-sanctions-with-respect-to-additional-sectors-of-iran>)

41. Ali Ranjipour, "Why the Revolutionary Guards Will Fail Iran's Car Industry," *IranWire*, June 12, 2020. (<https://iranwire.com/en/features/7157>); Saeed Ghasseminejad, "U.S. Should Sanction Key Iranian Automobile Companies," *Foundation for Defense of Democracies*, October 30, 2020. (<https://www.fdd.org/analysis/2020/10/30/sanction-key-iranian-automobile-companies>)

42. U.S. Department of the Treasury, Press Release, "United States Disrupts Large Scale Front Company Network Transferring Hundreds of Millions of Dollars and Euros to the IRGC and Iran's Ministry of Defense," March 26, 2019. (<https://home.treasury.gov/news/press-releases/sm639>)

43. "Iran: Defense Ministry Strengthening Collaborations With Automakers," *Financial Tribune* (Iran), December 21, 2019. (<https://web.archive.org/web/20200113224231/https://financialtribune.com/articles/auto/101323/iran-defense-ministry-strengthening-collaborations-with-automakers>)

44. Saeed Ghasseminejad, "U.S. Should Sanction Key Iranian Automobile Companies," *Foundation for Defense of Democracies*, October 30, 2020. (<https://www.fdd.org/analysis/2020/10/30/sanction-key-iranian-automobile-companies>)

45. Italian Ministry of Foreign Affairs and International Cooperation, Italian Trade Agency, "SAIPA Strengthening Ties With Technological Firms," July 12, 2020. (<https://www.ice.it/it/news/notizie-dal-mondo/154903>)

46. "SAIPA Propels Localization With Help From IRGC, Army," *Financial Tribune* (Iran), November 19, 2020. (<https://webcache.googleusercontent.com/search?q=cache:y-QPiYfKY6sJ:https://financialtribune.com/articles/auto/106196/saipa-propels-localization-with-help-from-irgc-army+&cd=1&hl=en&ct=clnk&gl=us>)

47. Executive Order 13846, "Reimposing Certain Sanctions With Respect to Iran," August 6, 2018. (<https://www.federalregister.gov/documents/2018/08/07/2018-17068/reimposing-certain-sanctions-with-respect-to-iran>); "Islamic Revolutionary Guard Corps (IRGC) Aerospace Force," *Iran Watch*, August 24, 2020. (<https://www.iranwatch.org/iranian-entities/islamic-revolutionary-guard-corps-irgc-aerospace-force>)

- **Petrochemical Sector:** The IRGC and the Iranian military are significant players in the petrochemical sector.⁴⁸ Military insurance and social security funds own large petrochemical companies,⁴⁹ and the IRGC's KAA is active in building petrochemical plants. In June 2019, Treasury designated Iran's Persian Gulf Petrochemical Industries Company for providing financial support to KAA.⁵⁰ Iran's petrochemical sector is subject to sanctions pursuant to Executive Order 13846.⁵¹

ENTITIES IN IRAN CONNECTED TO THE IRGC AND/OR TERRORISM

As of January 19, 2021, more than 300 Iran-connected companies, institutions, and individuals were sanctioned explicitly for their support for terrorism and/or for being owned and/or controlled by the IRGC.⁵² Sanctions relief of any form that provides benefits to these entities and individuals – including removal from the Specially Designated Nationals and Blocked Persons List, granting general licenses, or issuing national security waivers pursuant to various Iran sanctions laws – would provide direct budgetary assistance to the IRGC and to Iran's sponsorship of terrorism, unrelated to the JCPOA. The following is a list of 320 Iran-connected individuals and entities designated by the Treasury Department for their support for terrorism and/or connection to the IRGC as of January 19, 2021.

A	AHMED, Isma'il Fu'ad Rasul
ABADAN OIL REFINING COMPANY	AHMED, Qassim Abdullah Ali
ABBATAY, Muhammad	AL KHAMAEL MARITIME SERVICES
'ABD AL-HAMID AL-ASADI, Makki Kazim	AL-'ARIF, Sultan Yusuf Hasan
ABDOLLAHI, Hamed	AL-ASHTAR BRIGADES
AFKHAMI RASHIDI, Mahmud	AL-BILAD ISLAMIC BANK FOR INVESTMENT AND FINANCE P.S.C.
AGHAJANI, Hosein	ALCHWIKI, Mhd Amer
AHMADIAN, Ali Akbar	AL-HAJJ, Yahya

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48. Secretary of State Michael R. Pompeo, U.S. Department of State, Press Statement, "Designations Targeting Iran's Largest Petrochemical Company for Support to Iran's Islamic Revolutionary Guard Corps (IRGC)," June 7, 2019. (<https://www.state.gov/designations-targeting-irans-largest-petrochemical-company-for-support-to-irans-islamic-revolutionary-guard-corps-irgc>); Saeed Ghasseminejad, "Tehran Exports Its Petrochemical Products Despite Sanctions," *Foundation for Defense of Democracies*, April 25, 2019. (https://www.fdd.org/analysis/policy_briefs/2019/04/25/tehran-exports-its-petrochemical-products-despite-sanctions)

49. Saeed Ghasseminejad and Behnam Ben Taleblu, "Washington Targets Tehran's Petrochemical Trade by Sanctioning Military Pension Fund," *Foundation for Defense of Democracies*, April 2, 2020. (<https://www.fdd.org/analysis/2020/04/02/washington-targets-tehrans-petrochemical-trade-by-sanctioning-military-pension-fund>)

50. U.S. Department of the Treasury, Press Release, "Treasury Sanctions Iran's Largest Petrochemical Holding Group and Vast Network of Subsidiaries and Sales Agents," June 7, 2019. (<https://home.treasury.gov/news/press-releases/sm703>)

51. Executive Order 13846, "Reimposing Certain Sanctions With Respect to Iran," August 7, 2018. (<https://www.federalregister.gov/documents/2018/08/07/2018-17068/reimposing-certain-sanctions-with-respect-to-iran>)

52. U.S. Department of the Treasury, Office of Foreign Assets Control, "Sanctions List Search," accessed January 19, 2021. (<https://sanctionssearch.ofac.treas.gov>)

AL-KHALIDI, Faisal Jassim Mohammed al-Amri

ALLAHDAD, Hushang

AL-MUSTAFA INTERNATIONAL
UNIVERSITY

AL-NAKHALAH, Ziyad

AL-QA'IDA KURDISH BATTALIONS

AL-SHAKHAN, Fuad Ahmad Nuri Ali

AL-ZAHRANI, Ahmed Abdullah Saleh
al-Khazmari

AL-ZAYDI, Shibl Muhsin 'Ubayd

AMINI, Meghdad

ANDISHEH MEHVARAN
INVESTMENT COMPANY

ANSAR BANK

ANSAR BANK BROKERAGE COMPANY

ANSAR EXCHANGE

ANSAR INFORMATION
TECHNOLOGY COMPANY

ARAGHI, Abdollah

ARBABSIAR, Manssor

ARIAN BANK

ASADI, Ali Farhan

ATABAKI, Alireza

ATIEH SAZAN DAY

ATLAS EXCHANGE

AZARPISHEH, Mehdi

B

BADIN, Yadollah

BAHJAT AL KAWTHAR COMPANY FOR
CONSTRUCTION AND TRADING LTD.

BAHMAN GROUP

BAKHTIARI, Mashallah

BANCO INTERNACIONAL DE DESARROLLO

BANDAR ABBAS ZINC
PRODUCTION COMPANY

BANK KARGOSHAEE

BANK MARKAZI JOMHOURI ISLAMI IRAN

BANK MELLAT

BANK MELLI IRAN

BANK SADERAT IRAN

BANK SADERAT PLC

BANK TEJARAT

BAQIYATTALLAH UNIVERSITY OF
MEDICAL SCIENCES

BASIJ RESISTANCE FORCE

BAYUMI, Yisra Muhammad Ibrahim

BEHINEH TRADING

BEHNAM SHAHRIYARI TRADING COMPANY

BEHSHAHR INDUSTRIAL
DEVELOPMENT CORP.

BLUE AIRWAYS

BMIIC INTERNATIONAL
GENERAL TRADING

BONYAD TAAVON BASIJ

BONYAD TAAVON SEPAH

BUALI INVESTMENT COMPANY

C

CALCIMIN

CASPIAN AIRLINES

CEMENT INDUSTRY INVESTMENT AND
DEVELOPMENT COMPANY

D

DAMAVAND POWER
GENERATION COMPANY

DAY BANK

DAY BANK BROKERAGE COMPANY

DAY E-COMMERCE

DAY EXCHANGE COMPANY

DAY IRANIAN FINANCIAL AND
ACCOUNTING SERVICES COMPANY

DAY LEASING COMPANY

DEEP OFFSHORE TECHNOLOGY
COMPANY, P.J.S.

DENA AIRWAYS

DIANAT, Amir

E

EBRAHIMI, Ayatollah

EBRAHIMI, Hasan Dehghan

EDBI EXCHANGE BROKERAGE

EDBI STOCK BROKERAGE

EP-LDA (Aircraft)

EP-LDC (Aircraft)

EP-PUA (Aircraft)

EP-PUL (Aircraft)

EP-PUM (Aircraft)

ESFAHAN'S MOBARAKEH STEEL COMPANY

ETEMAD TEJARATE PARS CO.

EXPORT DEVELOPMENT BANK OF IRAN

F

FADAKAR, Alireza

FARHAT, Muhammad 'Abd-al-Amir

FATEMIYOUN DIVISION

FATER ENGINEERING INSTITUTE

FATTAH, Parviz

FIRST EAST EXPORT BANK

FORENT TECHNIK GMBH

FORUZANDEH, Ahmed

FREE LIFE PARTY OF KURDISTAN

FUTURE BANK B.S.C.

G

GHANI, Esmail

GHARARGAHE SAZANDEGI GHAEM

GHASEMZADEH, Mehdi

GHASHGHAHI, Hamed

GHOLAMSHAHI, Abbas

GHOLIZADEH, Vali

GHORB KARBALA

GHORB NOOH

GHUMAYN, Abu Bakr Muhammad Muhammad

GLOBAL VISION GROUP

H

HAJI BASIR AND ZARJMIL
COMPANY HAWALA

HAJI KHAIRULLAH HAJI SATTAR
MONEY EXCHANGE

HAJIZADEH, Amir Ali

HAMRAHAN PISHRO TEJARAT
TRADING COMPANY

HARA COMPANY

HASAN YUSUF, Ahmad

HEIDARI, Reza

HEJAZI, Mohammad

HEKMATYAR, Gulbuddin

HEMMATI, Alireza

HITAL EXCHANGE

I

IMAM HOSSEIN UNIVERSITY

IMAM KHOMEINI SHAZAND OIL
REFINING COMPANY

IMENSAZEN CONSULTANT
ENGINEERS INSTITUTE

IRAN MARINE INDUSTRIAL
COMPANY, SADRA

IRAN TRACTOR
MANUFACTURING COMPANY

IRAN ZINC MINES
DEVELOPMENT COMPANY

IRANIAN ATLAS COMPANY

IRANIAN MINISTRY OF INTELLIGENCE
AND SECURITY

IRANIAN OIL PIPELINES AND
TELECOMMUNICATION CO.

IRAN-VENEZUELA BI-NATIONAL BANK

IRGC GROUND FORCES

IRGC NAVY

IRLU, Hasan

ISLAMIC REVOLUTIONARY GUARD CORPS

ISLAMIC REVOLUTIONARY GUARD CORPS
(IRGC)-QODS FORCE

ISLAMIC REVOLUTIONARY GUARD CORPS
AEROSPACE FORCE SELF SUFFICIENCY
JIHAD ORGANIZATION

ISLAMIC REVOLUTIONARY GUARD
CORPS AIR FORCE

ISLAMIC REVOLUTIONARY GUARD CORPS
AL-GHADIR MISSILE COMMAND

ISLAMIC REVOLUTIONARY GUARD CORPS
ELECTRONIC WARFARE AND CYBER
DEFENSE ORGANIZATION

ISLAMIC REVOLUTIONARY GUARD CORPS
RESEARCH AND SELF-SUFFICIENCY JEHAD
ORGANIZATION

IZADI, Muhammad Sa'id

J

JA'FARI, Mohammad Agha

JABARIN, Zaher

JAFARI, Mohammad Ali

JAHAN ARAS KISH

JALAL MAAB, Mohammad

JAYSH AL-ADL

JOINT PARTNERSHIP OF MOHAMMADREZA
KHEDMATI AND ASSOCIATES

K

KAREEM, Aras Habib

KAZEMABAD, Mahmud Bagheri

KHATAM OL ANBIA GHARARGAH
SAZANDEGI NOOH

KHEDRI JAHAN DARYA CO

KHEDRI, Abdolhossein

KHODA'I, Mohammad Hasan

KISH P AND I CLUB

L

LINER TRANSPORT KISH

M

MADA'IN NOVIN TRADERS

MADANIPOUR, Mahmoud

MAHAN AIR

MAHER TRADING AND
CONSTRUCTION COMPANY

MAKIN INSTITUTE

MARTYRS FOUNDATION

MASJEDI, Iraj

MEHR BANK

MEHR EQTESAD BANK

MEHR EQTESAD FINANCIAL GROUP

MEHR-E EQTESAD-E IRANIAN
INVESTMENT COMPANY

MELLAT BANK CLOSED
JOINT-STOCK COMPANY

MELLI BANK PLC

MELLI INTERNATIONAL BUILDING &
INDUSTRY COMPANY

MERAJ AIR

MIDDLE EAST SAMAN
CHEMICAL COMPANY

MINA'I, Mohammad

MINISTRY OF DEFENSE AND ARMED
FORCES LOGISTICS

MINISTRY OF PETROLEUM

MIR BUSINESS BANK

MIRAGE FOR ENGINEERING AND TRADING

MIRAGE FOR WASTE MANAGEMENT AND
ENVIRONMENTAL SERVICES SARL

MOHAMMADI, Behzad

MONTAZAMI, Gholamreza

MORTEZAVI, Hasan

MURAJ, Yousef Ali

MURTADHA MAJEED RAMADHAN
ALAWI, Alsayed

MUSAVI, Hossein

MUSAVI, Sayyed Kamal

MUSAVIFAR, Sayyed Reza

MUSAVIR, Sayyed Yaser

N

NAJAFPUR, Sa'id

NAQDI, Mohammad Reza

NATIONAL DEVELOPMENT FUND OF IRAN

NATIONAL INDUSTRIES AND MINING
DEVELOPMENT COMPANY

NATIONAL IRANIAN OIL COMPANY

NATIONAL IRANIAN OIL ENGINEERING
AND CONSTRUCTION COMPANY

NATIONAL IRANIAN OIL PRODUCTS
DISTRIBUTION COMPANY

NATIONAL IRANIAN OIL REFINING AND
DISTRIBUTION COMPANY

NATIONAL IRANIAN TANKER COMPANY

NATIONAL PETROCHEMICAL COMPANY

NEGIN SAHEL ROYAL
INVESTMENT COMPANY

NEW HORIZON ORGANIZATION

NIKBAKHT, Mas'ud

O

OMID BONYAN DAY INSURANCE SERVICES

OMRAN SAHEL

OMRAN VA MASKAN ABAD DAY COMPANY

ORDOUBADI, Nader Talebzadeh

ORIENTAL OIL KISH

OWHADI, Mohammad Ebrahim

OZMA'I, Ali

P

PAKPOUR, Mohammad

PARDAZESH TASVIR RAYAN CO.

PARSIAN BANK

PARSIAN CATALYST CHEMICAL COMPANY

PELARAK, Hassan

PERSIA INTERNATIONAL BANK

PERSIAN GULF SABZ KARAFARINAN

POUYA AIR

PRINTING TRADE CENTER GMBH

PUREBRAHIM, Ali Akbar

Q

QASEMI, Rostam

QASIR, Ali

QESHM FARS AIR

QESHM ZINC SMELTING AND
REDUCTION COMPANY

R

RAH SAHEL INSTITUTE

RAHAB INSTITUTE

RAHAT LTD

RASHED EXCHANGE

RAVANKAR, Mansur

RAZAVI, Esma'il

RECONSTRUCTION ORGANIZATION OF
HOLY SHRINES IN IRAQ

REEM PHARMACEUTICAL

REZAIE, Morteza

RONAGHI, Iraj

ROYAY-E ROZ KISH
INVESTMENT COMPANY

S

SABURINEZHAD, Hasan

SADIQABADI, Alireza

SAFAVI, Yahya Rahim

SAHEL CONSULTANT ENGINEERS

SAJJAD, Rasoul

SAKAN EXCHANGE

SALEHI, Foad

SALIMI, Hosein

SARAYA AL-MUKHTAR

SARDASHTI, Nasrollah

SEIF, Mahmoud

SEIF, Valiollah

SEPANIR OIL AND GAS
ENGINEERING COMPANY

SEPASAD ENGINEERING COMPANY

SEYED ALHOSSEINI, Akbar

SHAHLAI, Abdul Reza

SHAHVARPOUR NAJAFABADI, Hassan

SHAKURI, Gholam

SHARIF, Niamat Hama Rahim Hama

SHARIFI, Ali

SHIR AMIN, Javad Bordbar

SHOMAL CEMENT COMPANY

SHOUSHTARIPOUSTI, Masoud

SINA BANK

SOLEIMANI, Qasem

SOUTH WEALTH RESOURCES COMPANY

SYRIAN ARAB AIRLINES

T

TABATABAEI, Sayyid Ali Akbar

TADBIRGARAN ATIYEH IRANIAN
INVESTMENT COMPANY

TAEB, Hossein

TAKTAR INVESTMENT COMPANY

TANGSIRI, Ali Reza

TARZALI, Ali

TECHNOTAR ENGINEERING COMPANY

TEHRAN GOSTARESH COMPANY, P.J.S.

TEHRANI, Sayyed Mohammad Ali
Haddadnezhad

TEJARAT ALMAS MOBIN HOLDING

TEJARAT GOSTAR FARDAD

TIDEWATER MIDDLE EAST CO.

TOSE-E DIDAR IRANIAN
HOLDING COMPANY

TOSE-E DONYA SHAHR KOHAN COMPANY

TOSE-E MELLI GROUP
INVESTMENT COMPANY

TOSE-E MELLI INVESTMENT COMPANY

U

UKRAINIAN-MEDITERRANEAN AIRLINES

V

VALADZAGHARD, Mohammadreza Khedmati

Y

YAGHOUBI MIAB, Hossein

YK-AGA (Aircraft)
YK-AGB (Aircraft)
YK-AGC (Aircraft)
YK-AGD (Aircraft)
YK-AGE (Aircraft)
YK-AGF (Aircraft)
YK-AIA (Aircraft)
YK-AIC (Aircraft)
YK-AKA (Aircraft)
YK-AKB (Aircraft)
YK-AKC (Aircraft)
YK-AKD (Aircraft)
YK-AKE (Aircraft)
YK-AKF (Aircraft)
YK-ANC (Aircraft)
YK-AND (Aircraft)
YK-ANE (Aircraft)
YK-ANF (Aircraft)
YK-ANG (Aircraft)
YK-ANH (Aircraft)
YK-AQA (Aircraft)
YK-AQB (Aircraft)
YK-AQD (Aircraft)

YK-AQE (Aircraft)
YK-AQF (Aircraft)
YK-AQG (Aircraft)
YK-ATA (Aircraft)
YK-ATB (Aircraft)
YK-ATC (Aircraft)
YK-ATD (Aircraft)
YK-AVA (Aircraft)
YK-AVB (Aircraft)
YK-AYA (Aircraft)
YK-AYB (Aircraft)
YK-AYC (Aircraft)
YK-AYD (Aircraft)
YK-AYE (Aircraft)
YK-AYF (Aircraft)

Z

ZAGROS PARDIS KISH

ZAHEDI, Mohammed Reza

ZANGANEH, Bijan

ZANGANEH, Touraj

ZANJAN ACID PRODUCTION COMPANY

ZAYNABIYOUN BRIGADE

ZIRAH, Ramezan

Richard Goldberg is a senior advisor at FDD. He previously served as director for countering Iranian weapons of mass destruction at the White House National Security Council and as deputy chief of staff to former U.S. Senator Mark Kirk (R-IL). **Saeed Ghasseminejad** is a senior Iran and financial economics advisor at FDD, where he specializes in Iran's economic and financial markets, sanctions, and illicit finance. **Behnam Ben Taleblu** is a senior fellow at FDD, where he focuses on Iran's foreign and security policy, specifically its nuclear and missile programs and regional networks. **Matthew Zweig** is a senior fellow at FDD. He previously served at the State Department and House Foreign Affairs Committee. **Mark Dubowitz** is FDD's chief executive. Sanctioned by Iran in 2019, he is widely recognized as a key influencer in shaping sanctions policies to counter the threats from the regime in Iran.