Timeline of U.S. Sanctions

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Since 2005, the United States has designated Iranian individuals, companies, and organizations for involvement in nuclear proliferation, ballistic missile development, support for terrorist groups, and human rights abuses. These designations have been made under the following presidential executive orders and two new pieces of legislation:

- Executive Order 13224 was issued on September 23, 2001. It applies to entities accused of supporting terrorism.
- Executive Order 13382 was issued on June 28, 2005. It applies to entities accused of supporting Iran's nuclear proliferation and missile-related activities.
- Comprehensive Iran Sanctions, Accountability, and Divestment Act was issued on July 1, 2010. It amends the Iran Sanctions Act of 1996.
- Executive Order 13553 was issued on September 29, 2010. It applies to Iranian officials responsible for serious human rights abuses.
- Executive Order 13574 was issued on May 23, 2011. It applies further sanctions to entities under the Iran Sanctions Act of 1996.
- Executive Order 13590 was issued on November 21, 2011. It authorizes the Secretary of State to impose sanctions on persons involved in certain activities in Iran's energy and petrochemical sectors.
- Section 1245 of the National Defense Authorization Act for fiscal year 2012 was issued on December 31, 2011. It imposes unilateral sanctions against the Central Bank of Iran.
- **Executive Order 13599** was issued on February 6, 2012. It blocks the property of the Government of Iran and all Iranian financial institutions.

- Executive Order 13606 was issued on April 23, 2012. It blocks the property and suspends the entry into the United States of certain persons involved in grave human rights abuses via information technology.
- Executive Order 13608 was issued on May 1, 2012. It prohibits certain transactions with and suspends entry into the United States of Iran sanctions evaders. It authorizes the Secretary of the Treasury to impose certain measures on a foreign person violating sanctions on Iran.

June 28, 2005 (Executive Order 13382)

Military for involvement in Iran's ballistic missile development

- Aerospace Industries Organization (AIO)
- Shahid Hemmat Industrial Group
- Shahid Bakeri Industrial Group

Nuclear for operating Iran's nuclear facilities

• Atomic Energy Organization of Iran (AEOI)

January 4, 2006 (Executive Order 13382)

Nuclear

- Novin Energy Company: Transferred millions of dollars on behalf the Atomic Energy Organization of Iran (AEOI) to entities associated with Iran's nuclear program.
- Mesbah Energy Company: AEOI Subordinate and procurer for Iran's heavy water project.

July 18, 2006 (Executive Order 13382)

Construction, Engineering, and Technology

- Sanam Industrial Group: Subordinate of Aerospace Industries Organization (AIO). Purchased millions of dollars worth of equipment from entities associated with missile proliferation.
- Ya Mahdi Industries Group: Subordinate of Iran's AIO. Made international purchases of missile-related technology and goods for Iran.

January 9, 2007 (Executive Order 13882)

Banks

• Bank Sepah/Bank Sepah International Plc (UK): *State-owned bank. U.S. Treasury alleges Bank Sepah provides support to entities affiliated with Iran's nuclear program.*

Individuals

• Ahmad Derakhshandeh: Chairman and Director of Bank Sepah.

February 16, 2007 (Executive Order 13382)

Construction, Engineering, Industry and Technology

- Kalaye Electric Company: Affiliated with centrifuge research and development through the Atomic Energy Organization of Iran (AEOI).
- Kavoshyar Company: Wholly-owned by AEOI.
- Pioneer Energy Industries Company: Provides technical support services to AEOI.

March 30, 2007 (Executive Order 13382)

Military

• Defense Industries Organization (DIO): Controlled by Iran's Ministry of Defense Armed Forces Logistics. Involved in Iran's nuclear and missiles programs.

June 8, 2007 (Executive Order 13382)

Construction, Engineering, Industry and Technology

- Pars Tarash (Pars Trash Co.): Affiliated with the Atomic Energy Organization of Iran (AEOI).
- Farayand Technique: *Affiliated with the AEOI.*
- Fajr Industries Group (Industrial Factories of Precision Machinery): *Affiliated with Aerospace Industries Organization (AIO).*
- Mizan Machine Manufacturing Group: Affiliated with AIO.

June 15, 2007 (Executive Order 13382)

Individuals

- Ali Hajinia Leilabadi: Agent of Mesbah Energy Company. Involved in Iran's heavy water development.
- Mohammad Qannadi: Agent of the Atomic Energy Organization of Iran.

October 25, 2007 (Executive Order 13382 and Executive Order 13224)

Banks

- Bank Melli Iran (Executive Order 13382): *Iran's largest bank. Provides services to entities involved in nuclear and ballistic missile programs, Revolutionary Guards (IRGC) and Qods Force.*
- Bank Mellat (Executive Order 13382): *Provides banking services to the Atomic Energy Organization of Iran (AEOI) and Novin Energy Company.*
- Bank Saderat Iran (Executive Order 13224): Has approximately 3,200 branch offices. U.S. Treasury alleges Iranian Government uses the bank to channel funds to terrorist organizations.

Petroleum and Petrochemicals

• Oriental Oil Kish (Executive Order 13382): Owned or controlled by the IRGC.

Construction, Engineering, Industry and Technology (Executive Order 13382)

- Khatam al-Anbya Construction Headquarters: Engineering arm of IRGC. Involved in construction of streets, highways, tunnels, water conveyance projects, agricultural restoration projects, and pipelines.
- Ghorb Nooh: Owned or controlled by the IRGC or its leaders. Affiliate of Khatam al-Anbya.
- Sahel Consultant Engineering: Owned or controlled by IRGC.
- Ghorb-e Karbala: Owned or controlled by IRGC.
- Sepasad Engineering Co.: Owned or controlled by IRGC. Specializes in earth and concrete dam construction, road construction, and tunneling.
- Omran Sahel: *Owned or controlled by IRGC.*
- Hara Company: Owned or controlled by IRGC. Reportedly building a tunnel facility in northeast Tehran for use in nuclear weapons research and development.
- Gharargahe Sazandegi Ghaem: Owned or controlled by IRGC.

Military (Executive Order 13382)

- Islamic Revolutionary Guard Corps (IRGC): Elite branch of Iran's military. Involved in nuclear and ballistic missiles programs.
- Ministry of Defense and Armed Forces Logistics (MODAFL): *Iran's ministry of defense. It has ultimate authority over Aerospace Industries Organization (AIO). AIO was designated on June 28, 2005.*
- IRGC-Qods Force (Executive Order 13224): *Branch of IRGC. The United States alleges that Qods Force provides material support to terrorist organizations.*

Individuals (Executive Order 13382)

- Ahmad Vahid Dastjerdi: *Head of Aerospace Industries Organization (AIO)*.
- Bahmanyar Morteza Bahmanyar: *Head of Finance & Budget Department, AIO.*
- Reza-Gholi Esmaeli: Head of Trade and International Affairs Dept., AIO.
- General Hosein Salimi: Commander of the Air Force, IRGC.
- Brigadier General Morteza Rezaie: Deputy Commander of the IRGC.
- Vice Admiral Ali Akhbar Ahmadian: Then Chief of IRGC Joint Staff.
- Brigadier Gen. Mohammad Hejazi: Then Commander of Basij resistance force, IRGC.
- Brigadier General Qasem Soleimani: Commander of the Qods Force, IRGC.

March 12, 2008 (Executive Order 13382)

Banks

• Future Bank, B.S.C.: Investment bank operating in Iran and Persian Gulf States. Joint venture of Bank Saderat Iran, Bank Melli Iran, and Ahli United Bank (Bahrain) with branches and in Bahrain and a representative office in Tehran.

July 8, 2008 (Executive Order 13382)

Construction, Engineering, Industry and Technology

- Parchin Chemical Industries: *Imports and exports chemical goods throughout the world as a subsidiary of Iran's Defense Industries Organization (DIO). DIO was designated on March 30, 2007.*
- 7th of Tir: DIO subsidiary involved in Iran's nuclear centrifuge development program.
- Ammunition and Metallurgy Industries Group: DIO subsidiary and parent of 7th of Tir.
- Shahid Sattari Industries: *Manufacturing and maintains ground support equipment for Shahid Bakeri Industries Group (SBIG). SBIG was designated on June 28, 2005 for its role in Iran's missile program.*
- TAMAS Company: A nuclear fuel production company.

Individuals

- Dawood Agha-Jani: Affiliated with the Atomic Energy Organization of Iran (AEOI). Head of Pilot Fuel Enrichment Plant at Natanz, Iran's main uranium enrichment facility.
- Mohsen Fakhrizadeh-Mahabadi: Director of nuclear program at Iran's Center for Readiness and New Defense Technology and former head of Iran's Physics Research Center.
- Moshen Hojati: *Affiliated with Aerospace Industries Organization (AIO), the overall manager of Iran's missile program.*
- Mehrdada Akhlaghi Ketabachi: Head of Shahid Bakeri Industries Group (SBIG).
- Naser Maleki: Oversees work on the Shahab-3 ballistic missile program. Head of Shahid Hemmat Industrial Group (SHIG). SHIG was designated on June 28, 2005 for its role in Iran's ballistic missile program.
- General Yahya Rahim-Safavi: *Armed forces advisor to Ayatollah Khamenei and former IRGC commander.*

August 12, 2008 (Executive Order 13382)

Nuclear

- Esfahan Nuclear Fuel Research and Production Center: *Uranium fuel conversion facility for the Atomic Energy Organization of Iran (AEOI).*
- Jabber Ibn Hayan: Performs nuclear research, development, and laboratory services on the nuclear fuel cycle for the AEOI.
- Nuclear Research Center for Agriculture and Medicine: *Research component of AEOI.*
- Joza Industrial Company: Procurement front company for Shahid Hemmat Industrial Group (SHIG). SHIG was designated on June 28, 2005.
- Safety Equipment Procurement Company (SEP Co.): Procurement front company for Aerospace Industries Organization of Iran (AIO).

September 10, 2008 (Executive Order 13382)

Shipping

- Islamic Republic of Iran Shipping Lines (IRISL): *State-owned shipping company*. *Transports sanctioned missile-related and proliferation-related military cargo for Iran's government*.
- Asia Marine Network PTE (IRISL Asia PTE) Ltd./CISCO Shipping Co. Ltd.
 (IRISL Korea Co. Ltd.)/ Iran o Hind Shipping Company/ Iran o Misr Shipping
 Company/Irinivestship, Ltd./IRISL Benelux NV/IRISL China Shipping Co.,
 Ltd./IRISL Europe GMbH/IRISL (Malta) Limited/IRISL Marine Services &
 Engineering Company/IRISL Multimodal Transport Co./IRISL (UK)
 Ltd./IRITAL Shipping SRL Company/ Khazar Sea Shipping Lines/South
 Shipping Line Iran/ Shipping Computer Services Company/ Valfajr 8thShipping
 Line Co. SSK: Foreign and domestic subsidiaries of IRISL.
- Oasis Freight Agencies: *Joint venture between IRISL and Sharaf Shipping Company (UAE).*

September 17, 2008 (Executive Order 13382)

Construction, Engineering, Industry and Technology

- Armament Industries Group: *Manufactures weapons and weapons systems. Subsidiary of Iran's Defense Industries Organization (DIO).*
- Iran Aircraft Manufacturing Industrial Company (HESA): Aircraft manufacturing and assembly company. Provides support to IRGC. Owned or controlled by Iran's Ministry of Defense and Armed Forces Logistics (MODAFL). MODAFL was designated on October 25, 2007.
- Farasakht Industries: HESA subsidiary. Manufactures aerospace tools and designed aeronautical equipment.
- Iran Electronics Industries (IEI): Wholly-owned subsidiary of MODAFL. Largest manufacturer of electronic and communication equipment in Iran. Manufactures components for Iranian weapons systems.
- Iran Communications Industries: *IEI subsidiary*. *Procurement company owned or controlled by MODAFL*.
- Shiraz Electronics Industries: *IEI subsidiary. Produces radars, electronic equipment for military.*

October 22, 2008 (Executive Order 13882)

Banks

- Export Development Bank of Iran (EDBI): *Provides financial services to Iran's Ministry of Defense and Armed Forces Logistics (MODAFL).*
- Banco Internacional de Desarrollo, C.A.: *Venezuela-based bank owned or controlled by EDBI*.
- EDBI Exchange Company/EDBI Stock Brokerage Company: *Owned or controlled by EDBI*.

December 17, 2008 (Executive Order 13382)

Banks

• ASSA Co. Ltd./ASSA Corporation: Controlled by Bank Melli. Established as shell companies for Bank Melli to disguise the bank's 40 percent ownership interest in the 650 Fifth Avenue Company in New York City. ASSA Corp. the subsidiary of ASSA Co. Ltd.

March 3, 2009 (Executive Order 13382)

Banks

- Bank Melli Iran Investment Company/BMIIC International General Trading Co.: Owned or controlled by Bank Melli, designated October 25, 2007 for providing services to entities linked to Iran's nuclear program.
- Bank Melli Printing and Publishing Co.: Owned or controlled by Bank Melli. Responsible for printing for domestic branches of Bank Melli.
- First Persian Equity Fund: Owned or controlled by Melli Investment Holding International (MEHR) and Bank Melli Iran Investment Company (BMIIC).
- MEHR Cayman Ltd.: *Cayman Islands-based. Owned or controlled by MEHR and BMIIC.*
- Melli Investment Holding International: Dubai-based. Wholly-owned by BMIIC.

Construction, Engineering, Industry and Technology (Executive Order 13382)

- Cement Investment and Development Co. (CIDCO): *Owned or controlled by BMIIC. Founded to manage BMIIC's holdings in cement industry in* 2004.
- Mazandaran Cement Company: Owned or controlled by CIDCO.
- Mazandaran Textile Company: Owned or controlled by Bank Melli Iran Investment Company (BMIIC).
- Melli Agrochemical Company PJS: Pesticide company established in 1986. Owned or controlled by BMIIC.
- Shomal Cement Company: Owned or controlled by CIDCO.

April 7, 2009 (Executive Order 13382)

Construction, Engineering, Industry and Technology

- Amin Industrial Complex: Owned or controlled by Defense Industries Organization (DIO). DIO was designated on March 30, 2007.
- Kaveh Cutting Tools Company: Owned or controlled by DIO. Produces centrifuge components for Iran's nuclear centrifuge program.
- Khorasan Metallurgy Industries: Owned or controlled by DIO. Subsidiary of Ammunition Industries Group. Produces centrifuge components.
- Niru Battery Manufacturing Company: DIO subsidiary. Manufactures power units for Iranian missile systems.
- Shahid Sayyade Shirazi Industries: *Produces large caliber items and cartridge cases. Produces components for improvised explosive devices (IEDs).*
- Yazd Metallurgy Industries: *Ammunition Industries Group (AMIG) subsidiary owned or controlled by DIO.*

November 5, 2009 (Executive Order 13382)

Banks

• First East Export Bank, P.L.C.: Malaysian subsidiary of Bank Mellat. Bank Mellat was designated on October 25, 2007 for providing financial services for Iran's nuclear program.

Individuals

• Ali Divandari: Chairman of Bank Mellat.

February 10, 2010 (Executive Order 13382)

Construction, Engineering, Industry and Technology

- Fater Engineering Institute: *Subsidiary of Khatam al-Anbya Construction Headquarters, the engineering arm of the IRGC.*
- Imensazen Consultant Engineers Institute: *Subsidiary of Khatam al-Anbya. Supports IRGC mining and engineering projects.*
- Makin Institute: Subsidiary of Khatam al-Anbya. Supports IRGC mining and engineering projects.
- Rahab Institute: Subsidiary of Khatam al-Anbya. Supports IRGC mining and engineering projects.

Individuals

• General Rostam Qasemi: IRGC General. Commander of Khatam al-Anbya Construction Headquarters.

June 16, 2010 (Executive Order 13382)

Shipping

- Hafiz Darya Shipping Co.: Islamic Republic of Iran Shipping Lines (IRISL) front company. Used for IRISL containerized shipping operations beginning in 2009.
- Safiran Payan Darya Shipping: IRISL front company. Used for IRISL bulk and cargo operations beginning in April 2009.
- Soroush Sarzamin Asatir Ship Management Co.: IRISL front company. Performs ship management for IRISL.
- Seibow Limited/Seibow Logistics Limited: *Hong Kong-based IRISL front companies*.

<u>Military</u>

- IRGC Air Force: *In charge of deployment and operations of Iran's ballistic missile program.*
- IRGC Missile Command: *In charge of deployment and operations of Iran's ballistic missile program.*
- Naval Defense Missile Industry Group: Owned or controlled by AIO.

Individuals

• Mohammad Ali Jafari: Commander-in-Chief, IRGC since September 2007.

- Javedan Mehr Toos: Procurement broker for Kalaye Electric Co. Kalaye was designated on February 16, 2007 for its affiliation with Iran's nuclear program.
- Mohammad Reza Naqdi: Head of IRGC Basij Resistance Force since October 2009.
- Javad Karimi Sabet: *Affiliated with the AEOI as head of Novin Energy Company.*
- Ahmad Vahidi: *Iran's Minister of Defense and Armed Forces Logistics since September* 2009.

Banks

• Post Bank: Provides financial services to Bank Sepah and acts on its behalf. Bank Sepah was designated on January 9, 2007 for providing services to Iran's nuclear program.

Construction, Engineering, Industry and Technology

- Rah Sahel Institute: Owned or controlled by Khatam al-Anbya. Khatam al-Anbya was designated on October 25, 2007 for its affiliation with the IRGC. Rah Sahel has served as a contractor for Iran's natural gas plant project in Tombak.
- Sepanir Oil and Gas Engineering Co.: Owned or controlled by Khatam al-Anbya. Sepanir is a major contractor for Iran's petroleum industry.

July 1, 2010 (Comprehensive Iran Sanctions, Accountability, and Divestment Act) This act amends the Iran Sanctions Act of 1996, which requires sanctions to be imposed or waived for companies that are determined to have certain investments in Iran's energy sector.

August 3, 2010 (Executive Order 13224)

Organizations Supporting Terrorist Organizations

- Iranian Committee for the Reconstruction of Lebanon: *Channels Iranian material and financial support for Hezbollah*.
- Imam Khomeini Relief Committee (IKRC) Lebanon Branch: *Helped fund Hezbollah* youth training camps to recruit future Hezbollah members and operatives. Hezbollah leaders acknowledge IKRC is funded by Iran.

Individuals

- Hushang Allahdad: IRGC-Qods Force financial officer. Oversees distribution of funds to Hezbollah, Hamas and Palestinian Islamic Jihad.
- Hossein Musavi: *Qods Force General and Commander of Ansar Corps. Provides financial and material support to the Taliban.*
- Hasan Mortezavi: *Qods Force Colonel. Provides financial and material support to the Taliban.*
- Mohammad Reza Zahedi: *Qods Force commander in Lebanon. Acted as liaison to Hezbollah and Syrian intelligence services.*
- Hessam Khoshnevis: Director of the Iranian Committee for the Reconstruction of Lebanon. Provides financial, material, and technological support to Hezbollah.
- Ali Zuraik: Director of the Imam Khomeini Relief Committee Lebanon branch. Provides financial and material support to Hezbollah.

• Razi Musavi: Syria-based Iranian official. Provides financial and material support to Hezbollah.

September 29, 2010 (Executive Order 13553)

Human Rights abuses: Individuals

- Mohammad Ali Jafari: Commander of the Islamic Revolutionary Guard Corps (previous designated under E.O. 13382).
- Sadeq Mahsouli: *Minister of Welfare and Social Security, former Minister of the Interior and Deputy Commander-in-Chief of the Armed Forces for Law Enforcement.*
- Qolam-Hossein Mohseni-Ejei: *Prosecutor-General of Iran, former Minister of Intelligence.*
- Saeed Mortazavi: Head of Iranian Anti-Smuggling Task Force, former Prosecutor-General of Iran.
- Heydar Moslehi: *Minister of Intelligence*.
- Mostafa Mohammad Najjar: Minister of the Interior and Deputy Commander-in-Chief of the Armed Forces for Law Enforcement.
- Ahmad-Reza Radan: Deputy Chief of the National Police.
- Hossein Taeb: Deputy Islamic Revolutionary Guard Corps Commander for Intelligence, former Commander of the Basij Forces.

May 23, 2011 (Executive Order 13574)

This executive order creates further prohibitions of financial transactions with sanctioned individuals under the Iran Sanctions Act of 1996, as amended by CISADA.

November 21, 2011 (Executive Order 13590)

This executive order gives the Secretary of State authority to impose sanctions on persons that knowingly engage in a number of activities in Iran's energy and petrochemical sectors.

Individuals

- Javad Rahiqi: Linked to the Atomic Energy Organization of Iran (AEOI).
- Neka Novin: Linked to the AEOI.
- Parto Sanat: *Linked to the AEOI.*
- Paya Partov: *Linked to the AEOI.*

Nuclear:

- Nuclear Reactors Fuel Company: *Played a role in Iran's nuclear procurement networks*.
- Noor Afzar Gostar Company: Played a role in Iran's nuclear procurement networks.

- Fulmen Group: Played a role in Iran's nuclear procurement networks.
- Yasa Pact: Played a role in Iran's nuclear procurement networks.
- Modern Industries Technique Company: Linked to the AEOI.
- Simatic: *Linked to the AEOI.*
- Iran Centrifuge Technology Company: *Linked to the AEOI.*

December 31, 2011 (Section 1245 of the National Defense Authorization Act for fiscal year 2012)

This act calls for sanctions on foreign financial institutions that knowingly conduct or facilitate significant financial transactions with Iran. But it also allows the U.S. government to issue 180-day waivers for countries that significantly reduce their Iranian imports. Waivers can be extended for further reductions.

February 6, 2012 (Executive Order 13599)

Banks

- Government of Iran (and all its agencies).
- Central Bank of Iran (and all other financial institutions).

April 23, 2012 (Executive Order 13606)

Human Rights abuses: Entities

- Islamic Revolutionary Guards Corps: The IRGC's Guard Cyber Defense Command includes a special department called the Center for Inspecting Organized Crimes, which ensures the regime's cyber security.
- Iranian Ministry of Intelligence and Security: Monitored opposition activities and responsible for beatings, sexual abuse, prolonged interrogations, and coerced confessions of prisoners following the June 2009 presidential elections in Iran.
- Law Enforcement Forces of the Islamic Republic of Iran: *Arrested many bloggers and activists through advanced monitoring systems after the* 2009 *post-election protests*.
- Datak Telecom: Iranian Internet service provider. Provided information to the government on individuals trying to circumvent official Internet censorship and facilitated surveillance of emails.

May 1, 2012 (Executive Order 13608)

This executive order increases penalties on Iranian-sanction evaders, including restrictions on certain transactions and visa bans to the United States.

June 28, 2012 (Section 1245 of the National Defense Authorization Act for fiscal year 2012)

This act allows the president to sanction foreign banks that conduct financial transactions for Iranian oil and petroleum products.

July 12, 2012 (Executive Order 13382 and Executive Order 13599)

<u>Defense and Aerospace</u> (Executive Order 13382)

- Electronic Components Industries Co.: Linked to Iran Electronics Industries.
- Information Systems Iran: Linked to Iran Electronics Industries.
- Advanced Information and Communication Technology Center: *Has provided support to Information Systems Iran*.
- Digital Media Lab and Value-Added Services Laboratory: *Linked to Advanced Information and Communication Technology Center.*
- Ministry of Defense Logistics Export: Linked to the Ministry of Defense and Armed Forces Logistics.
- International General Resourcing FZE: Provided material support for the Aerospace Industries Organization.
- Malek Ashtar University: *Owned or controlled by the Ministry of Defense and Armed Forces Logistics.*

Shipping (Executive Order 13382)

- Good Luck Shipping: Located in the UAE, but acts on behalf of the Islamic Republic of Iran Shipping Line (IRISL). Good Luck Shipping was established to replace Great Oceans Shipping Services, which was a designated entity by Executive Order 13382.
- 57 vessels affiliated with IRISL and 7 vessels as blocked property in which IRISL has an interest.

Nuclear (Executive Order 13382)

- Pentane Chemistry Industries: *Linked to the development of Iran's weapons of mass destruction programs.*
- Center for Innovation and Technology Cooperation: Facilitates procurement and technology transfer from the science community to the military services.

Individuals (Executive Order 13382)

- Hamid Reza Rabiee: Founder and current director of the Advanced Information and Communication Technology Center.
- Daniel Frosch: Provided material support for the Aerospace Industries Organization and is the owner of International General Resourcing FZE.
- Ali Fadavi: IRGC Navy Commander.

• Hossein Tanideh: A procurement agent for Iran's nuclear program through late 2011.

Preventing the Circumvention of International Sanctions (Executive Order 13599)

- Exposing front companies involved in Iran's oil trade.
- 20 Iranian financial institutions.
- 58 National Iranian Tanker Company Vessels and 27 of its affiliated entities.