In the name of God, the Compassionate, the Merciful

20 August 2020

Excellency,

With reference to the intended inadmissible submission of a "notification" by the United States in relation to UN Security Council Resolution 2231 (2015), and further to my letters of 10 May 2018 (S/2018/453), and of 8 May 2020 (S/2020/380), I would like to bring the following—concerning the unlawful attempt by the United States of America to abuse the Security Council in submitting such Notification to the Council—to your attention.

The reckless and unlawful U.S. position disregards well-established rules of international law and practices that have been formed over the course of centuries to save our world from anarchy.

U.S. justifications for its self-arrogated right to the "reapplication of the provisions of terminated resolutions" [1] on Iran have no credibility or legitimacy, and need to be rejected by the Council. It is imperative for the international community to be vigilant about such abuse of Security Council procedures. Iran urges the Council to halt this abuse of process—one that will have serious consequences for international peace and security.

H.E. Ambassador Dian Triansyah Djani
President of the Security Council,

[1] The word "snapback" is never used in JCPOA or UNSCR 2231. The United States has used this word to connote rapidity and automaticity, which has never been the intention or the procedure in the JCPOA and UNSCR 2231. Instead they both set out an elaborate time-consuming process, intended to preserve the JCPOA and not to destroy it. The wording in paragraph 37 0f JCPOA is re-imposition of provisions of old resolutions. The wording in Paragraphs 12-13 of UNSCR 2231 is "reapplication of the provisions of terminated resolutions 1696 (2006), 1737 (2006), 1747 (2007), 1803 (2008), 1835 (2008), and 1929 (2010)."

Based on the following clear and compelling reasonings, the government of the Islamic Republic of Iran is strongly of the view that the U.S. has no right to recourse to the reapplication of the provisions of the terminated resolutions. In this respect, a set of factual and legal observations is brought to your kind attention:

I. Termination of U.S. Participation in the JCPOA

The president of the United States officially announced the unilateral termination of U.S. participation in the Joint Comprehensive Plan of Action (JCPOA),[2] in material breach of UNSCR 2231—which endorses the JCPOA annexed to it. Accordingly, the U.S. administration took extensive unlawful measures to terminate U.S. participation in the JCPOA and to re-impose all U.S. sanctions lifted in connection with the JCPOA, thus committing multiple cases of "significant non-performance" under the JCPOA, and in flagrant contravention of UNSCR 2231.

U.S. officials themselves have repeatedly acknowledged that they have terminated their participation in the JCPOA. The U.S. president, in his Executive Order issued to re-impose the nuclear-related sanctions against Iran noted that, "I, DONALD J. TRUMP, President of the United States of America, in light of my decision on May 8, 2018, to cease the participation of the United States in the Joint Comprehensive Plan of Action of July 14, 2015 (JCPOA)".[3] Secretary of State Mike Pompeo expressed that, "President Trump terminated the United States participation in the Joint Comprehensive Plan of Action".[4] On 11 May 2018, the U.S. Government agent—in a formal communication—officially informed all JCPOA Participants that the U.S. would no longer participate in JPOCA–related meetings and activities, stressing, "on May 8,

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[2] The White House, Presidential Actions, "*Ceasing U.S. Participation in the JCPOA*", 8 May 2018. Available at: https://www.whitehouse.gov/presidential-actions/ceasing-u-s-participation-jcpoa-taking-additional-action-counter-irans-malign-influence-deny-iran-paths-nuclear-weapon/

[3] Federal Register, Presidential Document, "*Reimposing Certain Sanctions with Respect to Iran*", 6 August 2018. Available at: https://www.federalregister.gov/documents/2018/08/07/2018-17068/reimposing-certain-sanctions-with-respect-to-iran

[4] Remarks of Secretary of State Mike Pompeo at Heritage Foundation, 21 May 2018. Available at: https://www.heritage.org/defense/event/after-the-deal-new-iran-strategy

2018, President Trump announced that the United States is ending its participation in the Joint Comprehensive Plan of Action. This includes all activities... Effective immediately, the U.S. will no longer participate in JCPOA–related activities." One example of such non-participation is that the Security Council has continued to approve proposals recommended by the Joint Commission regarding the nuclear related activities set forth in the Procurement Channel. But in the past two years, the United States has not participated in the Procurement Working Group, and has not been part of the JCPOA Joint Commission.

From a legal standpoint, the term "participant" is not a simple honorific title, rather, it requires taking part in an activity or event in compliance with an agreed upon and specifically defined description of duties, rights and obligations. With respect to UNSCR 2231, being a 'JCPOA Participant' involves contribution to JCPOA-related events and activities as well as compliance with respective obligations and responsibilities. The U.S. has not taken part in even a single meeting of the Joint Commission or JCPOA-related bodies since its official decision to "cease participation". This fact has been underscored by the remaining JCPOA Participants inter alia, and the EU, as the Coordinator of the JCPOA Joint Commission. The EU Representative to the UN pointed out that since the announcement of its withdrawal, "the US has not participated in any meetings or activities within the framework of the agreement".

II. U.S. Officially Abrogated Any Right to Dispute Resolution Mechanism

On several occasions, U.S. officials have confessed that they no longer have the right to utilize the Dispute Resolution Mechanism specified in paragraphs 10 to 13 of UNSCR 2231. On 8 May 2018, then-U.S. National Security Advisor John Bolton, in briefing the White House press corps on the decision of the U.S. president to re-impose sanctions, stated clearly that the United States will not be seeking the

reapplication of provisions of the terminated resolutions[5] through recourse to, as he said, "provisions of Resolution 2231, which we're not using because we're out of the deal."[6] And on 16 August 2020, John Bolton reiterated that, "The agreement's (JCPOA) backers argue that Washington, having withdrawn from the deal, has *no standing to invoke its provisions. They're right*."[7]

Brian H. Hook, Special Representative for Iran and Senior Policy Advisor to the U.S. Secretary of State at the time, clearly stated that, "we're no longer in the deal, and so the parties that are still in the deal will have to make their decisions with respect to using or not using the dispute resolution mechanism".[8]

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[5] Available at: https://www.theguardian.com/world/2018/may/08/iran-deal-trump-withdraw-us-latest-news-nuclear-agreement
Also see https://carnegieendowment.org/2020/05/09/can-pompeo-trap-future-president-biden-in-trump-s-self-imposed-iran-crisis-pub-81760

[6] "Q In terms of the hundred—what happens in 180 days, what ultimately is going to happen with the European companies that have begun to trade with Iran? Are we for certain going to be sanctioning those companies? Or is there 180-day period where that can be potentially negotiated
away?
AMBASSADOR BOLTON: Well, the decision that the President signed today puts sanctions back in place that existed at the time of the deal; it puts them in place immediately.
Now, what that means is that within the zone of economics covered by the sanctions, no new contracts are permitted. Treasury will be announcing, in the next few hours, what they call winddown provisions that will deal with existing contracts. And there will be varying periods within these contracts to be wound down. Some will extend up to six months; some might be 90 days. There might be other provisions as well.
This contingency has been posted on the Treasury Department website since 2015 because of the potential for the use of the provisions of Resolution 2231, which we're not using because we're out of the deal. But in other words, the concept that there would be a wind-down period has been there for a long time. And that's basically the pattern we'll follow — we are following. But the fact of the sanctions coming back in is effective right now.
Q But that won't be negotiated away during that — for those existing —
AMBASSADOR BOLTON: We're out of the deal.
Q We're out.
AMBASSADOR BOLTON: We're out of the deal. We're out of the deal.
Q Are we out of the deal?
AMBASSADOR BOLTON: You got it." Available at:https://www.whitehouse.gov/briefings-statements/press-briefing-national-security-advisor-john-bolton-iran/

[7] John Bolton, "*Iran 'Snapback' Isn't Worth the Risk*", the Wall Street Journal, 16 August 2020. Available at: https://www.wsj.com/articles/iran-snapback-isnt-worth-the-risk-11597595060

[8] Remarks of Brian H. Hook, Special Representative for Iran and Senior Policy Advisor to the Secretary of State. Available at: https://www.state.gov/middle-east-peace-and-security

Therefore, it is abundantly clear that all U.S. officials without exception assumed—and some, like the architect of the U.S. withdrawal[9] John Bolton, explicitly and publicly stated—that the United States *no longer* has any recourse to the reapplication of the provisions of terminated resolutions via provisions of UNSCR 2231.

The fact is that the Trump administration was clearly hoping that the U.S.' unlawful withdrawal from the JCPOA, coupled with its illegal "maximum pressure" policy, would either cause the Iranian government to collapse, bring the nation to its knees, or provoke a reciprocal Iranian withdrawal from the JCPOA. Because these assumptions have been proven wrong, it now shamelessly is attempting to change course and—in an extreme case of bad faith—conveniently resort to the procedure that they initially—and permanently—closed to themselves.

State Counselor Wang Yi, Minister for Foreign Affairs of the People's Republic of China, in his letter to the Secretary-General (S/2020/517) also took the position that "The United States, no longer a participant in the Plan after withdrawing from it, has no right to demand that the Security Council invoke the snapback provision."[10]

At the UN Security Council meeting on 30 June 2020, members of the Council stressed that the U.S. has no right to take advantage of the Dispute Resolution Mechanism. The People's Republic of China took the position that "Having quit the JCPOA, the US is no longer a participant, and has no right to trigger snap-back at the Security Council".[11] Germany confirmed China's rejection of the reapplication of the provisions of terminated resolutions via UNSCR 2231 at the very same meeting—with the Permanent Representative of Germany to the UN declaring that, "I would also

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[10] Letter dated 8 June 2020 from the Permanent Representative of China to the United Nations addressed to the Secretary-General and the President of the Security Council, S/2020/517.

[11] Ministry of Foreign Affairs of the People's Republic of China, "*Statement by Ambassador Zhang Jun at Security Council Open VTC on Iranian Nuclear Issue*",30 June 2020. Available at: https://www.fmprc.gov.cn/mfa_eng/wjb_663304/zwjg_665342/zwbd_665378/t1793668.shtml

align myself with what my Chinese colleague just said about the snapback mechanism".[12]

The European Union Representative to the UN disapproved of the U.S. intention to abuse the process of the UNSCR 2231 and the JCPOA and noted that "I would like to address the issue of the possible snapback of sanctions in this Council, about which there has been recent speculation. As the High Representative has already said, in May 2018 the US announced that it was ending its participation in the JCPOA. This announcement was confirmed in a presidential memorandum".[13] Most recently he confirmed that fact and has stressed that "we therefore consider that the U.S. is not in a position to resort to mechanisms reserved for JCPOA participants (such as the so-called snapback)".[14]

Therefore, as highlighted by Foreign Minister Lavrov in his letter to the Secretary-General (S/2020/451), "Having violated the Security Council resolution 2231 and *rejected* to implement the JCPOA, the US thus forfeited the possibility to use the mechanisms provided, *inter alia*, in paragraphs 11-13 of the resolution"[15].

Professor Larry D. Johnson—former Assistant Secretary-General for Legal Affairs who served in the UN Legal Office from 1971 to 2010—has presented his analysis of the U.S. attempt to resort to the mechanism.

> As of 8 May 2018, the US—according to its own official documents and statements—was no longer a "JCPOA participant." So on what basis does the US now claim to be a participating State under the resolution entitled to invoke

[12] Permanent Mission of the Federal Republic of Germany to the United Nations, "*Remarks by Ambassador Christoph Heusgen in the Security Council VTC Meeting on Non-proliferation*", 30 June 2020. Available at: https://new-york-un.diplo.de/un-en/news-corner/200630-heusgen-jcpoa/2361042

[13] Remarks by he European Union Representative to the United Nations, Amb. Olof Skoog, 30 June 2020.

[14] https://www.aljazeera.com/news/2020/08/trigger-snapback-sanctions-iran-eu-official-200816105311200.html

[15] Letter dated 27 May 2020 from the Permanent Representative of the Russian Federation to the United Nations addressed to the Secretary-General and the President of the Security Council, S/2020/451

> the snapback? Perhaps the argument is based on the US being described as a "JCPOA participant" in a paragraph of resolution 2231, which is independent of the text of the deal itself. It sounds like the argument is that since it was a "Chapter VII" binding resolution, the US is a "participant" until the Council decides otherwise, irrespective of the US position internally that it is out of the deal. If that is the legal basis, it is sorely flawed. First, the paragraph in question is purely descriptive and exhortatory; it lists as a factual matter who the participants were at the time of the adoption of the resolution in 2015. The Council did not impose or declare "participation status" on anyone. Second, the snapback under the binding paragraph of the resolution can only be triggered by a "participant State." The US as of now and by its own doing, is in the same position as other non-participants on the Council.[16]

In view of the above, and in light of the context, the object and purpose of UNSCR 2231, explicit admission by the White House on the day President Trump ordered to *"cease U.S. participation"*, subsequent practice by the U.S., statements by representatives of all remaining JCPOA Participants, and authoritative views of scholars and practitioners, the United States can by no stretch of imagination, flight of fancy, or mis-interpretation be considered a JCPOA Participant for the purpose of Resolution 2231.

III. U.S. Material Breach of UNSCR 2231 and Lack of Good Faith

According to operative paragraph 2 of UNSCR 2231, the Security Council

> Calls upon all Members States, regional organizations and international organizations to take such actions as may be appropriate to support the implementation of the JCPOA, including by taking actions commensurate with the implementation plan set out in the JCPOA and this resolution and by

[16] https://twitter.com/MarkTFitz/status/1296221037684838402?s=09

refraining from actions that undermine implementation of commitments ***under the JCPOA***;

The U.S. acted in grave violation of the JCPOA and UNSCR 2231 by unlawfully withdrawing from the JCPOA, unilaterally re-imposing sanctions from 8 May 2018 onwards and to this date, and *punishing* law-abiding states and other entities for *complying* with this obligation.

One of the well-established principles governing the creation and performance of legal obligations is *good faith*. Good faith is an inseparable part of international cooperation, especially when this cooperation is the basis for the implementation of the JCPOA and UNSCR 2231. The actions and positions of the current U.S. administration have proven that it has *never* acted in good faith.

Not only has the U.S. failed to honor its own commitments under the JCPOA, but it has also substantively obstructed the implementation of commitments by the remaining JCPOA participants and other UN Member States as required under UNSCR 2231.

Since President Trump's assumption of office, the U.S. has imposed sanctions against Iran over 145 times.[17] The Secretary-General underscored the importance of the sanction-lifting in accordance with relevant provisions of the JCPOA and UNSCR 2231—which the U.S. has disregarded. In his 7th Report on Implementation of UNSCR 2231, the Secretary-General pointed out that "the lifting of sanctions allowing for the normalization of trade and economic relations constitute an essential part of the Plan".[18]

U.S. violations of UNSCR 2231 have not been limited to its sanctions-lifting commitments. As reflected in the report of the Secretary-General, the U.S. decision to

[17] A list of U.S. sanctions against Iran are contained in annex to this letter.
[18] UN Security Council, Secretary General 7th Report on Implementation of UNSCR 2231, S/2019/492

not extend waivers for nuclear-related projects in the framework of the JCPOA also "continue to be contrary to the goals set out in the Plan and in resolution 2231 (2015) and may also impede the ability of the Islamic Republic of Iran to implement certain provisions of the Plan and of the resolution"[19].

Imposition of sanctions is a flagrant manifestation of "bad faith" in a grave breach of the JCPOA, UNSCR 2231, ICJ provisional order[20], as well as numerous resolutions of the United Nations General Assembly and Human Rights Council on unilateral economic coercive measures.

Therefore, as the International Court of Justice clearly underlined in its 1971 advisory opinion on Namibia:

> One of the fundamental principles governing international relationship thus established is that a party which disowns or does not fulfil its own obligations cannot be recognized as retaining the rights which it claims to derive from the relationship.[21]

Notification under UNSCR 2231 is not merely an arbitrary and formal action but a substantive part of a process of Dispute Resolution, which is intentionally subjected to several qualifications and conditions. Any *bona fide* JCPOA participant—United States not being one—is obliged to submit any notification under paragraph 11 of the UNSCR 2231 along with "*a description of the good-faith efforts the participant made to exhaust the dispute resolution process"* specified in paragraph 37 of the JCPOA, which is annexed to UNSCR 2231. The United States has engaged in no effort—*let alone* good faith effort—to "exhaust the dispute resolution process".

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[19] UN Security Council, Secretary General 8th Report on Implementation of UNSCR 2231, S/2020/531

[20] Alleged Violations of The 1955 Treaty of Amity, Economic Relations, and Consular Rights (Islamic Republic of Iran V. United States of America), Provisional Measures, ICJ Reports, 3 October 2018, Available at; https://www.icj-cij.org/files/case-related/175/175-20181003-ORD-01-00-EN.pdf

[21] Legal Consequences for States of the Continued Presence of South Africa in Namibia (South West Africa) notwithstanding Security Council Resolution 276 (1970), Advisory Opinion, I.C.J. Reports 1971, Para. 91.

Based on the universally accepted general principle of law, the United States cannot benefit from the fruits of its unlawful act[22]of withdrawal from the JCPOA by assuming that it has no obligation to submit its notification alongside a description of good-faith efforts. The Security Council should consider the related provisions of the JCPOA, as attached in Annex A to the Resolution.

The negotiating history of the JCPOA—and UNSCR 2231—clearly attests to the fact that the procedure for the settlement of dispute—within the Joint Commission as well as in the Security Council—was intentionally a multi-staged and time-consuming process to preserve this unique achievement of the international community and to prevent arbitrary action by any genuine participant, let alone the United States, which explicitly relinquished that status at the highest level.

In this context, it should be noted that the requirement of "good faith" also applies to the interpretation of Security Council Resolution 2231, and is reinforced by Article 2(2) of the Charter:

> All Members, in order to ensure to all of them the rights and benefits resulting from membership, shall fulfill in *good faith* the obligations assumed by them in accordance with the present Charter.

The United States' record of unlawful acts and practices in the present case, along with the "abuse of process", deceptive maneuverings and pseudo-legal legerdemain to trigger the reapplication the provisions of terminated resolutions against Iran contravene the requirement of good faith.

IV. Iran's Efforts in Good Faith to Fully Implement the JCPOA

The decision of the president of the United States to cease U.S. participation in the JCPOA was not preceded even by a *single* case of Iranian non-performance of its

[22] *Ex Injuria Sua Nemo Habere Debet*

obligations under the JCPOA, but *in spite of* full compliance by Iran—verified in 15 reports of the International Atomic Energy Agency from the date of conclusion of JCPOA until over a year after unlawful U.S. withdrawal[23].

Following the unlawful withdrawal of the United States and (re)imposition of its sanctions lifted in accordance with the JCPOA, Iran was deprived from enjoying the benefits of sanction-lifting under JCPOA. After U.S. withdrawal from the JCPOA, the UN Secretary General[24], the remaining JCPOA participants[25] and many other members of the international community called on Iran to address its concerns through the mechanisms established in the JCPOA and to allow the remaining JCPOA participants to redress the unlawful withdrawal.

From the beginning it was clear that "reintroduction or re-imposition, including through extension, of the sanctions and restrictive measures will constitute significant non-performance which would relieve Iran from its commitments in part or in whole"[26] –also stipulated in paragraph 26 of the JCPOA.[27]

While expressly reserving Iran's immediate right[28] under Paragraph 26 of the JCPOA, my Government initiated the Dispute Resolution Mechanism under Paragraph

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[23] IAEA Reports to the Security Council: S/2016/57 (19 January 2016), S/2016/250 (15 March 2016), S/2016/535 (13 June 2016), S/2016/808 (22 September 2016), S/2016/983 (21 November 2016), S/2017/234 (20 March 2017), S/2017/502 (14 June 2017), S/2017/777 (13 September 2017), S/2017/994 (28 November 2017), S/2018/205 (8 March 2018), S/2018/540 (6 June 2018), S/2018/835 (12 September 2018), S/2018/1048 (26 November 2018), S/2019/212 (6 March 2019), S/2019/496 (14 June 2019).

[24] "Statement by the Secretary-General on the Joint Comprehensive Plan of Action (JCPOA)", 08 May 2018. Available at: https://www.un.org/sg/en/content/sg/statement/2018-05-08/statement-secretary-general-joint-comprehensive-plan-action-jcpoa

[25] "Remarks by High Representative/Vice President Federica Mogherini on the Statement by U.S. President Trump Regarding the Iran Nuclear Deal (JCPOA)", Rome, 8 May 2018.

[26] S/2015/550, Letter dated 20 July 2015 from the Permanent Representative of the Islamic Republic of Iran to the United Nations addressed to the President of the Security Council.

[27] Paragraph 26 of the JCPOA*: "Iran has stated that it will treat such a re-introduction or re-imposition of the sanctions specified in Annex II, or such an imposition of new nuclear-related sanctions, as grounds to cease performing its commitments under this JCPOA in whole or in part."*

[28] In my letter of 10 May 2018 to the Coordinator of the JCPOA Joint Commission, I stated "It is Iran's unquestionable right—recognized also under the JCPOA and UNSCR 2231—to take appropriate action in response to persistent numerous unlawful acts by the U.S., particularly its withdrawal and re-imposition of all sanctions. However, as President Rouhani announced in his televised response on 8 May and further

36 of the agreement on 10 May 2018[29]. However, acting in good faith, Iran refrained from applying the 'remedy' in order to enable the remaining JCPOA participants to make good on their promises. For a full year, Iran continued full implementation of the JCPOA. Fifteen consecutive IAEA reports verified Iran's full compliance with its JCPOA commitments.[30]

Having repeatedly exhausted the Dispute Resolution Mechanism to absolutely no avail, my Government decided to exercise its rights under Paragraphs 26 and 36 of the JCPOA to apply remedial measures and cease performing its commitments in part on 8 May 2019—in full compliance with the provisions of the JCPOA—in order to preserve the agreement.

In spite of all this, our remedial measures have until now had no impact on the IAEA's monitoring and verification of our peaceful nuclear program, thereby rendering any claim of proliferation risks irrelevant. Indeed, Iran's peaceful nuclear program remains subject to the "most robust" inspection regime in history. From 2016 through 2019, over 92 percent of the Agency's total comparable global inspections were carried out in Iran.[31]

V. Conclusion: Intended Notification by the U.S. Is *Inadmissible*

The U.S. disregard for the rule of law and abuse of the United Nations to advance its unilateralist interests and destroy the very foundations of multilateralism and international law poses a serious threat to the civilized world as well as international peace and security. Abusing and violating the provisions of paragraphs

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elaborated in the Statement of the Government on 10 May 2018, the Islamic Republic of Iran will decide its next step in the course of few weeks following consultations with the remaining JCPOA Participants to see if and how the commitments collectively undertaken by EU/E3+3 vis-a-vis Iran could be fulfilled in the absence of a reneging party by EU/E3+2. Nothing in this period would affect Iran' right to react and protect its national interest as appropriate, a right which is manifestly recognized in the JCPOA and the UNSC resolution 2231(2015)."

[29] My Letter of 10 May 2018 to the Coordinator of the JCPOA Joint Commission.

[30] IAEA Reports to the Security Council referenced in Footnote 23 above.

[31] IAEA, "The Safeguards Implementation Report for 2019", GOV/2020/9.

10 and 11 of the UNSCR 2231 by sending a simple notification—while the U.S. had already breached its obligations under the UNSCR 2231 and Article 25 of the UN Charter *via* re-imposition of unilateral and unlawful sanctions—sets an extremely dangerous precedent which must be clearly and vociferously rejected by the Council and its members.

As indicated at the outset of Paragraph 10 of the UNSCR 2231, the Dispute Resolution Mechanism is only open to the actual JCPOA Participants—and *not* to a defected "original" participant that willfully and explicitly decided to "cease participation", actively sought to destroy the instrument, and subsequently relinquished all its prerogatives and privileges.

The procedure is not a self-executive one and is subjected to conditions specified in Paragraphs 36 and 37 of the JCPOA as attached to and endorsed by UNSCR 2231 and operative Paragraphs 10-13 of UNSCR 2231. The illegal attempt by the U.S. to abuse the Dispute Resolution Mechanism for the purpose of destroying UNSCR 2231 and the JCPOA must be regarded as an *abuse of process* which will have a negative impact on the fundamental credibility and integrity of the UN Security Council.

The *abuse of process*, as prohibited in international law, is also prevented by the precise procedures in UNSCR 2231 as well. Given the history of illegal actions against Iran, this resolution was meticulously crafted at the time of the adoption of the JCPOA to prevent unilateral abuse of the Dispute Resolution Process. To that end, Paragraphs 10 and 11 of the Resolution refer to the Dispute Resolution requirements specified in Paragraphs 36 and 37 of the JCPOA. The Security Council in Paragraph 11 of the Resolution also 'expresses' the requirement of establishing the '*Advisory Board*' to ensure an end to arbitrary recourse to the Dispute Resolution Mechanism.

The Islamic Republic of Iran has already and clearly shown its good faith and full responsibility. Now, it is the turn of the international community. Accordingly, I urge the Security Council to take all appropriate measures to prevent the U.S.—an unapologetic and serial violator of UNSCR 2231—from unilaterally and unlawfully abusing the Dispute Resolution Mechanism, with the stated objective of destroying the JCPOA and UNSCR 2231, and refrain from admitting the notification and recognizing any effect arising therefrom. The Iranian people rightfully expect the Council to guarantee their rights under the Resolution, and bring the United States to account for the irreparable harm inflicted on the entire Iranian nation merely for reasons of personal aggrandizement or domestic political expediency.

In view of the above, I trust that the President of the Security Council will refrain from receiving and circulating the inadmissible U.S. notification, and the Council will not permit the U.S. to abuse Security Council Resolution 2231 to achieve its stated objective of destroying that very resolution—and along with it the authority of the Council and the Organization.

I should be grateful if you would have this letter circulated as a document of the Security Council.

Please accept, Excellency, the assurances of my highest consideration.

M. Javad Zarif

The United States Sanctions against Iran in Trump Administration

January 2017 to August 2020

No.	Description	Date
1	Addition of 13 Iranian (Iran-related) individuals and 12 Iranian (Iran-related) entities to the SDN List [1]	February 3, 2017
2	Addition of 1 Iranian individual and 1 Iranian entity to the SDN List[2]	April 13, 2017
3	Addition of 3 Iranian (Iran-related) individuals and 4 Iranian (Iran-related) entities to the SDN List[3]	May 17, 2017
4	Addition of 7 Iranian (Iran-related) individuals and 11 Iranian (Iran-related) entities to the SDN List[4]	July 18, 2017
5	Adoption of Countering America Adversaries Through Sanctions Act of 2017 [5]	July 27, 2017
6	Addition of 6 Iranian entities to the SDN List[6]	July 28, 2017
7	Addition of 7 Iranian individuals and 3 Iranian(Iran-related) entities to the SDN List[7]	September 14, 2017
8	Addition of 4 Iranian (Iran-related) entities to the SDN List[8]	October 13, 2017
9	Addition of 2 Iranian Individuals and 4 Iranian (Iran-related) entities to the SDN List[9]	November 20, 2017

[1] Available at: https://www.treasury.gov/resource-center/sanctions/OFAC-Enforcement/Pages/20170203.aspx

[2] Available at: https://www.treasury.gov/resource-center/sanctions/OFAC-Enforcement/Pages/20170413.aspx

[3] Available at: https://www.treasury.gov/resource-center/sanctions/OFAC-Enforcement/Pages/20170517.aspx

[4] Available at: https://www.treasury.gov/resource-center/sanctions/OFAC-Enforcement/Pages/20170718.aspx

[5] H.R.3364 – "*Countering America's Adversaries Through Sanctions Act*", Available at: https://www.congress.gov/bill/115th-congress/house-bill/3364/actions?KWICView=false

[6] Available at: https://www.treasury.gov/resource-center/sanctions/OFAC-Enforcement/Pages/20170728.aspx

[7] Available at: https://www.treasury.gov/resource-center/sanctions/OFAC-Enforcement/Pages/20170914.aspx

[8] Available at: https://www.treasury.gov/resource-center/sanctions/OFAC-Enforcement/Pages/20171013.aspx

10	Addition of 5 Iranian entities to the SDN List[10]	January 4, 2018
11	Addition of 5 Iranian (Iran-related) individuals and 9 Iranian (Iran-related) entities to the SDN List[11]	January 1, 2018
12	Addition of 10 Iranian Individuals and 1 Iranian entity to the SDN List[12]	March 23, 2018
13	Addition of 6 Iranian individuals and 3 Iranian entities to the SDN List[13]	May 10, 2018
14	Addition of 4 Iranian (Iran-related) individuals and 1 Iran-related entity to the SDN List, including the Governor of the Central Bank of Iran[14]	May 15, 2018
15	Addition of 5 Iranian individuals to the SDN List[15]	May 22, 2018
16	Addition of 3 Iranian (Iran-related) individuals and 6 Iranian (Iran-related)entities, and 31 Aircrafts to the SDN List[16]	May 28, 2018
17	Addition of 6 Iranian individuals and 3 Iranian entities to the SDN List[17]	May 30, 2018
18	Revocation of JCPOA-Related General Licenses:[18] - General License H: Authorizing Certain Transactions Relating to. Foreign Entities Owned or Controlled by a United States Person; - General License I: Authorizing Certain Transactions Related to the Negotiation of, and Entry into Contingent Contracts for Activities Eligible for Authorization Under the Statement of Licensing Policy for Activities Related to the Export or R-export to Iran of Commercial Passenger Aircraft	June 27, 2018

[9] Available at: https://www.treasury.gov/resource-center/sanctions/OFAC-Enforcement/Pages/20171120.aspx

[10] Available at: https://www.treasury.gov/resource-center/sanctions/OFAC-Enforcement/Pages/20180104.aspx

[11] Available at: https://www.treasury.gov/resource-center/sanctions/OFAC-Enforcement/Pages/20180112.aspx

[12] Available at: https://www.treasury.gov/resource-center/sanctions/OFAC-Enforcement/Pages/20180323.aspx

[13] Available at: https://www.treasury.gov/resource-center/sanctions/OFAC-Enforcement/Pages/20180510.aspx

[14] Available at: https://www.treasury.gov/resource-center/sanctions/OFAC-Enforcement/Pages/20180515.aspx

[15] Available at: https://www.treasury.gov/resource-center/sanctions/OFAC-Enforcement/Pages/20180522.aspx

[16] Available at: https://www.treasury.gov/resource-center/sanctions/OFAC-Enforcement/Pages/20180524.aspx

[17] Available at: https://www.treasury.gov/resource-center/sanctions/OFAC-Enforcement/Pages/20180530.aspx

[18] Available at: https://www.treasury.gov/resource-center/sanctions/OFAC-Enforcement/Pages/20180627.aspx

	and Related Parts and Services;	
19	Addition of Mahan Travel and Tourism (Civil Aviation Company) to the SDN List[19]	July 9, 2018
20	Issuance of Executive Order 13846 (Re-imposing Certain Sanctions with Respect to Iran)[20]	August 6, 2018
21	Addition of 1 Iran-related entity to the SDN List[21]	September 14, 2018
22	Addition of 20 Iranian entities to the OFAC's SDN List[22] Including some Iranian Banks and Iranian Automotive Companies	October 16, 2018
23	Issuance an amendment to the Iranian Transactions and Sanctions Regulations, 31 C.F.R. part 560 in furtherance of the President's May 8, 2018 decision to cease the United States' participation in the Joint Comprehensive Plan of Action[23]	November 2, 2018
24	Over 700 persons have been designated or identified and added to the SDN List[24] (including persons that had been removed from the SDN List under the JCPOA)	November 5, 2018
25	Addition of 2 Iranian individuals and 1 Iranian entity to the SDN List[25]	November 20, 2018
26	Addition of 2 Iranian individuals to the SDN List[26]	November 28, 2018
27	Addition of 4 Iranian (Iran-related) entities, including Mahan Qeshm Fars Air (Civil Aviation Company), and 2 Iranian Aircrafts to the SDN List[27]	January 24, 2019
28	Addition of 1 Turkish individual to the SDN List[28]	February 7, 2019

[19] Available at: https://www.treasury.gov/resource-center/sanctions/OFAC-Enforcement/Pages/20180709.aspx

[20] Available at: https://www.treasury.gov/resource-center/sanctions/OFAC-Enforcement/Pages/20180806.aspx

[21] Available at: https://www.treasury.gov/resource-center/sanctions/OFAC-Enforcement/Pages/20180914.aspx

[22] Available at: https://www.treasury.gov/resource-center/sanctions/OFAC-Enforcement/Pages/20181016.aspx

[23] Available at: https://www.treasury.gov/resource-center/sanctions/OFAC-Enforcement/Pages/20181102_33.aspx

[24] Available at: https://www.treasury.gov/resource-center/sanctions/OFAC-Enforcement/Pages/20181105_names.aspx

[25] Available at: https://www.treasury.gov/resource-center/sanctions/OFAC-Enforcement/Pages/20191120.aspx

[26] Available at: https://www.treasury.gov/resource-center/sanctions/OFAC-Enforcement/Pages/20191128.aspx

[27] Available at: https://www.treasury.gov/resource-center/sanctions/OFAC-Enforcement/Pages/20190124.aspx

[28] Available at: https://www.treasury.gov/resource-center/sanctions/OFAC-Enforcement/Pages/20190207.aspx

29	Addition of 9 Iranian individuals and 2 Iranian entities to the SDN List[29]	February 13, 2019
30	Addition of 14 Iranian individuals and 17 Iranian entities to the SDN List[30]	March 22, 2019
31	Addition of 9 Iranian individuals and 11 Iranian entities to the SDN List[31]	March 26, 2019
32	Designation of the Islamic Revolutionary Guard Corps as a Foreign Terrorist Organization[32]	April 8, 2019
33	Try to Get Iran's Oil Exports to Zero[33]	April 22, 2019
34	Advancing the Maximum Pressure Campaign by Restricting Iran's Nuclear Activities[34]	May 3, 2019
35	Issuance of Executive Order 13871 (Sanctions with Respect to the Iron, Steel, Aluminum, and Copper Sectors of Iran)[35]	May 8, 2019
36	Addition of 33 Iranian Petrochemical Companies to the OFAC's SDN List[36]	June 7, 2019
37	Addition of 2 Iranian-related individuals and 1 Iranian-related entity to the SDN List[37]	June 12, 2019
38	Issuance of Executive Order 13876, (Imposing Sanctions against High Ranking Officials of Iran)[38]	June 24, 2019
39	Addition of 9 Iranian High Ranking Officials including the Supreme Leader to the OFAC's SDN List[39]	June 4, 2019

[29] Available at: https://www.treasury.gov/resource-center/sanctions/OFAC-Enforcement/Pages/20190213.aspx

[30] Available at: https://www.treasury.gov/resource-center/sanctions/OFAC-Enforcement/Pages/20190322.aspx

[31] Available at: https://www.treasury.gov/resource-center/sanctions/OFAC-Enforcement/Pages/20190326.aspx

[32] Available at: https://www.whitehouse.gov/briefings-statements/statement-president-designation-islamic-revolutionary-guard-corps-foreign-terrorist-organization/

[33] Available at: https://www.state.gov/advancing-the-u-s-maximum-pressure-campaign-on-iran/

[34] Available at: https://www.state.gov/advancing-the-maximum-pressure-campaign-by-restricting-irans-nuclear-activities/

[35] Available at: https://www.treasury.gov/resource-center/sanctions/OFAC-Enforcement/Pages/20190508.aspx

[36] Available at: https://www.treasury.gov/resource-center/sanctions/OFAC-Enforcement/Pages/20190607.aspx

[37] Available at: https://www.treasury.gov/resource-center/sanctions/OFAC-Enforcement/Pages/20190612.aspx

[38] Available at: https://www.treasury.gov/resource-center/sanctions/OFAC-Enforcement/Pages/20190624.aspx

[39] Available at: https://www.treasury.gov/resource-center/sanctions/OFAC-Enforcement/Pages/20190624.aspx

40	Addition of 5 Iranian individuals and 7 Iranian-related entities to the SDN List[40]	July 18, 2019
41	Addition of 1 Iran-related individual and 1 Iran-related entity to the SDN List[41]	July 22, 2019
42	Addition of Iran's Minister of Foreign Affairs to the SDN List[42]	July 31, 2019
43	Addition of 5 Iranian (or Iranian related) individuals and 5 Iranian (or Iranian-related) entities to the SDN List[43]	August 28, 2019
44	Addition of an Iranian vessel (ADRIAN DARYA 1) and its Indian Commander to the SDN List [44]	August 30, 2019
45	Addition of 3 Iranian entities to the SDN List [45]	September 3, 2019
46	Addition of 9 Iranian individuals, 16 Iranian (or Iranian related) entities, and 6 Iranian (or Iranian related) Vessels to the SDN List [46]	September 4, 2019
47	Issuance of Executive Order 13886 Amending Executive Order 13224 [47]	September 10, 2019
48	Imposition of Sanctions against Iran's Central Bank and National Development Fund[48]	September 20, 2019
49	Addition of 5 Iran-related individuals and 6 Iran-related entities to the SDN List [49]	September 25, 2019
50	Imposition of New Sanctions on Iran and Extension of Nuclear Restrictions [50]	October 31, 2019

[40] Available at: https://www.treasury.gov/resource-center/sanctions/OFAC-Enforcement/Pages/20190718_33.aspx

[41] Available at: https://www.treasury.gov/resource-center/sanctions/OFAC-Enforcement/Pages/20190722.aspx

[42] Available at: https://home.treasury.gov/news/press-releases/sm749

[43] Available at: https://www.treasury.gov/resource-center/sanctions/OFAC-Enforcement/Pages/20190828.aspx

[44] Available at: https://www.treasury.gov/resource-center/sanctions/OFAC-Enforcement/Pages/20190830_33.aspx

[45] Available at: https://www.treasury.gov/resource-center/sanctions/OFAC-Enforcement/Pages/20190903_33.aspx

[46] Available at: https://www.treasury.gov/resource-center/sanctions/OFAC-Enforcement/Pages/20190904.aspx

[47] Available at: https://www.treasury.gov/resource-center/sanctions/OFAC-Enforcement/Pages/20190910.aspx

[48] Available at: https://www.treasury.gov/resource-center/sanctions/OFAC-Enforcement/Pages/20190920.aspx

[49] Available at: https://www.treasury.gov/resource-center/sanctions/OFAC-Enforcement/Pages/20190925.aspx

[50] Available at: https://www.state.gov/secretary-pompeo-imposes-new-sanctions-on-iran-and-extends-nuclear-restrictions/

51	Extension of Sanctions against Iran's Construction Sector Pursuant to the Iran Freedom and Counter-Proliferation Act (IFCA) of 2012 [51]	October 31, 2019
52	Addition of 9 individual and one entity to the SDN List [52]	November 4, 2019
53	Addition of Iran's Minister of Communication and information Technology to the SDN List [53]	November 22, 2019
54	Addition of 1 individual, 5 entities, and 2 Iranian vessels to the SDN List [54]	December 11, 2019
55	Addition of two Iranian Judges to the SDN List [55]	December 14, 2019
56	Addition of 7 Iranian individuals, 20 Iranian (Iran-related) entities and 1 vessel to the SDN List [56]	January 10, 2020
57	Issuance of Executive Order 13902 Imposing Sanctions with respect to Construction, Mining, Manufacturing and Textile Sectors of Iran [57]	January 10, 2020
58	Addition of one Iranian Military Official to the SDN List [58]	January 18, 2020
59	Addition of 2 individuals and 6 Chinese entities to the SDN List [59]	January 23, 2020
60	Addition of the Head of Iran Atomic Organization (IAO) to the SDN List [60]	January 31, 2020
61	Addition of 5 Members of Guardian Council of Constitution to the SDN List [61]	February 20, 2020
62	Addition of 15 Chinese, Turkish, Iraqi and Russian individuals to the SDN List [62]	February 25, 2020
63	Addition of Iran Air to the Entity List [63]	March 16, 2020
64	Addition of 4 Iranian (and Iranian related) individuals and	March 18, 2020

[51] Available at: https://www.state.gov/findings-pursuant-to-the-iran-freedom-and-counter-proliferation-act-ifca-of-2012/

[52] Available at: https://www.treasury.gov/resource-center/sanctions/OFAC-Enforcement/Pages/20191104.aspx

[53] Available at: https://www.treasury.gov/resource-center/sanctions/OFAC-Enforcement/Pages/20191122.aspx

[54] Available at: https://www.treasury.gov/resource-center/sanctions/OFAC-Enforcement/Pages/20191211.aspx

[55] Available at: https://www.treasury.gov/resource-center/sanctions/OFAC-Enforcement/Pages/20191214.aspx

[56] Available at: https://www.treasury.gov/resource-center/sanctions/OFAC-Enforcement/Pages/20200110.aspx

[57] Available at: https://www.treasury.gov/resource-center/sanctions/Programs/Documents/20200110_iran_eo.pdf

[58] Available at: https://www.state.gov/designation-of-irgc-commander-shahvarpour-for-gross-human-rights-violations-during-protest/

[59] Available at: https://www.treasury.gov/resource-center/sanctions/OFAC-Enforcement/Pages/20200123.aspx

[60] Available at: https://www.state.gov/designation-of-the-atomic-energy-organization-of-iran-its-head-ali-akbar-salehi-and-renewing-nuclear-restrictions/

[61] Available at: https://www.treasury.gov/resource-center/sanctions/OFAC-Enforcement/Pages/20200220.aspx

[62] Available at: https://www.state.gov/news-sanctions-under-the-iran-north-korea-and-syria-nonproloferation-act-inksna/

[63] Available at: https://www.federalregister.gov/documents/2020/03/16/2020-03157/addition-of-entities-to-the-entity-list-and-revision-of-entry-on-the-entity-list

	9 Iranian (and Iranian related) entities to the SDN List [64]	
65	Addition of 5 Iranian Nuclear Scientists to the Entity List [65]	March 18, 2020
66	Addition of 5 Non-Iranian entities to the SDN List [66]	March 19, 2020
67	Addition of 15 Iranian and Iraqi individuals and 5 Iranian and Iraqi entities to the SDN List [67]	March 26, 2020
68	Addition of one Iraqi individual and one Iraqi entity to the SDN List [68]	May 1, 2020
69	Addition of one Chines entity to the SDN List [69]	May 19, 2020
70	Addition of 9 Iranian individual and 3 entities to the SDN List [70] Including Iran's Interior Minister and Senior Law Enforcement Officials	May 20, 2020
71	End of the sanctions waiver covering all remaining JCPOA-originating nuclear projects in Iran [71]	May 27, 2020
72	Addition of 2 Iranian Nuclear Scientists to the SDN List [72]	May 27, 2020
73	Update the Reasons of Sanctions against Islamic Republic of Iran Shipping Lines (IRISL) and its Shanghai-based subsidiary, E-Sail Shipping Company Ltd (E-Sail) and several Iranian Ships [73]	June 8, 2020

[64] Available at: https://www.treasury.gov/resource-center/sanctions/OFAC-Enforcement/Pages/20200318.aspx

[65] Available at: https://www.state.gov/constraining-iranian-nuclear-scientists/

[66] Available at: https://www.treasury.gov/resource-center/sanctions/OFAC-Enforcement/Pages/20200319.aspx

[67] Available at: https://www.treasury.gov/resource-center/sanctions/OFAC-Enforcement/Pages/20200326.aspx

[68] Available at: https://www.treasury.gov/resource-center/sanctions/OFAC-Enforcement/Pages/20200501.aspx

[69] Available at: https://www.treasury.gov/resource-center/sanctions/OFAC-Enforcement/Pages/20200520.aspx

[70] Available at: https://www.treasury.gov/resource-center/sanctions/OFAC-Enforcement/Pages/20200519.aspx

[71] Available at: https://www.state.gov/keeping-the-world-safe-from-irans-nuclear-program/

[72] Available at: https://www.state.gov/keeping-the-world-safe-from-irans-nuclear-program/

[73] Available at: https://www.treasury.gov/resource-center/sanctions/OFAC-Enforcement/Pages/20200608.aspx

74	Addition of Five Iranian Captains to the SDN List [74]	June 24, 2020
75	Addition of 8 Major Iranian Metals Companies and Foreign Subsidiaries and Sales Agents to the SDN List [75]	June 25, 2020
76	Expansion of the Scope of Iran Metals Sanctions [76]	July 30, 2020
77	Seizure of over One Million Barrels of Iranian Gasoline [77]	August 14, 2020

[74] Available at: https://www.treasury.gov/resource-center/sanctions/OFAC-Enforcement/Pages/20200624.aspx

[75] Available at: https://www.treasury.gov/resource-center/sanctions/OFAC-Enforcement/Pages/20200625.aspx

[76] Available at: https://www.state.gov/expansion-of-the-scope-of-iran-metals-sanctions-targeting-irans-nuclear-military-and-ballistic-missile-programs-and-the-irgc/

[77] Available at: https://www.state.gov/on-u-s-seizure-of-iranian-gasoline-intended-for-the-illegitimate-maduro-regime/

The White House, OFAC, B.I.S, and Department of Justice Actions against Iran

January 2017 to August 2020

No.	Description	Date
1	$1.19 Billion Penalty for Chinese Company's Export Violations to Iran [78]	March 7, 2017
2	ZTE Corporation Agrees to Plead Guilty and Pay Over $430.4 Million for Violating U.S. Sanctions by Sending U.S.-Origin Items to Iran [79]	March 7, 2017
3	Iranian Member of International Cybercrime Conspiracy Sentenced to 10 Years in Prison for Selling Stolen Credit Card Information Online [80]	March 9, 2017
4	ZTE Corporation Pleads Guilty for Violating U.S. Sanctions by Sending U.S.-Origin Items to Iran [81]	March 22, 2017
5	Singapore Man Sentenced to 40 Months in Prison for Plot Involving Exports to Iran of U.S. Components [82]	April 27, 2017
6	Two Iranian Nationals Charged in Hacking of Vermont Software Company [83]	July 17, 2017
7	Two Iranian Nationals Charged in Credit Card Fraud and Computer Hacking Conspiracy [84]	August 8, 2017
8	CEO of International Metallurgical Company Sentenced to 57 Months in Prison for Conspiring to Export Specialty Metals to Iran [85]	September 7, 2017

[78] Available at: https://www.commerce.gov/news/press-releases/2017/03/secretary-commerce-wilbur-l-ross-jr-announces-119-billion-penalty

[79] Available at: https://www.justice.gov/opa/pr/zte-corporation-agrees-plead-guilty-and-pay-over-4304-million-violating-us-sanctions-sending

[80] Available at: https://www.justice.gov/opa/pr/iranian-member-international-cybercrime-conspiracy-sentenced-10-years-prison-selling-stolen

[81] Available at: https://www.justice.gov/opa/pr/zte-corporation-pleads-guilty-violating-us-sanctions-sending-us-origin-items-iran

[82] Available at: https://www.justice.gov/opa/pr/singapore-man-sentenced-40-months-prison-plot-involving-exports-iran-us-components

[83] Available at: https://www.justice.gov/opa/pr/two-iranian-nationals-charged-hacking-vermont-software-company

[84] Available at: https://www.justice.gov/opa/pr/two-iranian-nationals-charged-credit-card-fraud-and-computer-hacking-conspiracy

[85] Available at: https://www.justice.gov/usao-edny/pr/ceo-international-metallurgical-company-sentenced-57-months-prison-conspiring-export

9	Notice Regarding the Continuation of the National Emergency with Respect to Iran[86]	October 6, 2017
10	Turkish Banker Convicted of Conspiring to Evade U.S. Sanctions Against Iran and Other Offenses [87]	January 3, 2018
11	Commerce Department Moves Against Illicit Iran Aircraft Network [88]	February 5, 2018
12	Notice Regarding the Continuation of the National Emergency with Respect to Iran[89]	March 12, 2018
13	Iranian National Arrested for Scheme to Evade U.S. Economic Sanctions by Illicitly Sending More Than $115 Million From Venezuela Through the U.S. Financial System [90]	March 20, 2018
14	Iranian Citizen Sentenced for Conspiring to Facilitate the Illegal Export of Technology to Iran [91]	March 20, 2018
15	Nine Iranians Charged With Conducting Massive Cyber Theft Campaign on Behalf of the Islamic Revolutionary Guard Corps [92]	March 23, 2018
16	Issuance of FinCEN Advisory about Iran [93]	May 10, 2018
17	Turkish Banker Sentenced to 32 Months for Conspiring to Violate U.S. Sanctions Against Iran and Other Offenses [94]	May 16, 2018
18	Two Individuals Charged for Acting as Illegal Agents of the Government of Iran [95]	August 20, 2018
19	Canadian Sentenced to 3+ Years in Prison for Conspiracy to Export Restricted Goods and Technology to Iran [96]	August 22, 2018

[86] Available at: https://www.whitehouse.gov/presidential-actions/notice-regarding-continuation-national-emergency-respect-iran/

[87] Available at: https://www.justice.gov/opa/pr/turkish-banker-covicted-conspiring-evade-us-sanctions-against-iran-and-other-offenses

[88] Available at: https://www.bis.doc.gov/index.php/documents/about-bis/newsroom/press-releases/2190-yegane-tdo-final-cleared-press-release/file

[89] Available at: https://www.whitehouse.gov/presidential-actions/notice-regarding-continuation-national-emergency-respect-iran-2/

[90] Available at: https://www.justice.gov/opa/pr/iranian-national-arrested-scheme-evade-us-economic-sanctions-illicitly-sending-more-115

[91] Available at: https://www.justice.gov/opa/pr/iranian-citizen-sentenced-conspiring-facilitate-illegal-export-technology-iran

[92] Available at: https://www.justice.gov/opa/pr/nine-iranians-charged-conducting-massive-cyber-theft-campaign-behalf-islamic-revolutionary

[93] Available at: https://www.fincen.gov/news/news-releases/fincen-issues-advisory-iranian-regimes-illicit-and-malign-activities-and

[94] Available at: https://www.justice.gov/opa/pr/turkish-banker-sentenced-32-months-conspiring-violate-us-sanctions-against-iran-and-other

[95] Available at: https://www.justice.gov/opa/pr/two-individuals-charged-acting-illegal-agents-government-iran

20	Withdrawal from Treaty of Amity [97]	October 3, 2018
21	Notice Regarding the Continuation of the National Emergency with Respect to Iran[98]	October 8, 2018
22	Presidential Memorandum for the Secretary of State, the Secretary of the Treasury, and the Secretary of Energy[99]	October 31, 2018
23	Iranian National Pleads Guilty to Conspiring to Illegally Export Products From the United States to Iran [100]	November 8, 2018
24	Two Iranian Men Indicted for Deploying Ransomware to Extort Hospitals, Municipalities, and Public Institutions, Causing Over $30 Million in Losses [101]	November 28, 2018
25	$3 Million Reward Announced for Information Leading to Arrest of Iranian Tied to Illegal Procurement of U.S. Technology [102]	December 12, 2018
26	Former U.S. Counterintelligence Agent Charged With Espionage on Behalf of Iran; Four Iranians Charged With a Cyber Campaign Targeting Her Former Colleagues [103]	February 13, 2019
27	Notice Regarding the Continuation of the National Emergency with Respect to Iran [104]	March 12, 2019
28	Australian National Sentenced to Prison Term For Exporting Electronics to Iran [105]	March 21, 2019
29	Standard Chartered Bank Admits to Illegally Processing Transactions in Violation of Iranian Sanctions and Agrees to Pay More Than $1 Billion [106]	April 9, 2019

[96] Available at: https://www.justice.gov/opa/pr/canadian-sentenced-3-years-prison-conspiracy-export-restricted-goods-and-technology-iran

[97] Available at: https://www.state.gov/remarks-to-the-media-3/

[98] Available at: https://www.whitehouse.gov/briefings-statements/text-notice-continuation-national-emergency-respect-iran/

[99] Available at: https://www.whitehouse.gov/presidential-actions/presidential-memorandum-secretary-state-secretary-treasury-secretary-energy-4/

[100] Available at: https://www.justice.gov/opa/pr/iranian-national-pleads-guilty-conspiring-illegally-export-products-united-states-iran

[101] Available at:https://www.justice.gov/opa/pr/two-iranian-men-indicted-deploying-ransomware-extort-hospitals-municipalities-and-public

[102] Available at: https://www.fbi.gov/contact-us/field-offices/minneapolis/news/press-releases/3-million-reward-announced-for-information-leading-to-arrest-of-iranian-tied-to-illegal-procurement-of-us-technology

[103] Available at: https://www.justice.gov/opa/pr/former-us-counterintelligence-agent-charged-espionage-behalf-iran-four-iranians-charged-cyber

[104] Available at: https://www.whitehouse.gov/briefings-statements/text-notice-continuation-national-emergency-respect-iran-2/

[105] Available at: https://www.justice.gov/usao-dc/pr/australian-national-sentenced-prison-term-exporting-electronics-iran

30	UniCredit Bank AG Agrees to Plead Guilty for Illegally Processing Transactions in Violation of Iranian Sanctions [107]	April 15, 2019
31	Memorandum on the Presidential Determination Pursuant to Section 1245(d)(4)(B) and (C) of the National Defense Authorization Act for Fiscal Year 2012[108]	April 29, 2019
32	Two Indictments Unsealed Charging Iranian Citizen with Violating U.S. Export Laws and Sanctions Against Iran [109]	June 4, 2019
33	Morris County Woman Admits Conspiring With Iranian National To Illegally Export Aircraft Components To Iran [110]	June 11, 2019
34	Extradition of Iranian National and Unsealing of Charges against Two Other Men for Exporting Carbon Fiber from the United States to Iran [111]	July 16, 2019
35	Iranian Export Company Executive Pleads Guilty to Violating U.S. Sanctions Against Iran [112]	July 19, 2019
36	Publication of Iran-related Civil Aviation Industry Advisory[113]	July 23, 2019
37	Iranian Citizen Pleads Guilty to Conspiring to Facilitate the Illegal Export of Technology to Iran [114]	August 9, 2019
38	Iranian Businessman Pleads Guilty To Conspiracy To Violate U.S. Sanctions By Exporting Carbon Fiber From The United States To Iran [115]	August 29, 2019
39	Turkish Businessman Sentenced to 27 Months Imprisonment for Conspiracy to Violate U.S. Sanctions	September 3, 2019

[106] Available at: https://www.justice.gov/opa/pr/standard-chartered-bank-admits-illegally-processing-transactions-violation-iranian-sanctions

[107] Available at: https://www.justice.gov/opa/pr/unicredit-bank-ag-agrees-plead-guilty-illegally-processing-transactions-violation-iranian

[108] Available at: https://s3.amazonaws.com/public-inspection.federalregister.gov/2019-10472.pdf

[109] Available at: https://www.bis.doc.gov/index.php/documents/about-bis/newsroom/press-releases/2404-two-indictments-unsealed-charging-iranian-citizen-with-violating-u-s-export-laws-and-sanctions-against-iran/file

[110] Available at: https://www.justice.gov/usao-nj/pr/morris-county-woman-admits-conspiring-iranian-national-illegally-export-aircraft

[111] Available at: https://www.justice.gov/opa/pr/department-justice-announces-extradition-iranian-national-and-unsealing-charges-against-two

[112] Available at: https://www.justice.gov/usao-ndny/pr/iranian-export-company-executive-pleads-guilty-violating-us-sanctions-against-iran

[113] Available at: https://www.treasury.gov/resource-center/sanctions/OFAC-Enforcement/Pages/20190723.aspx

[114] Available at: https://www.justice.gov/opa/pr/iranian-citizen-pleads-guilty-conspiring-facilitate-illegal-export-technology-iran

[115] Available at: https://www.justice.gov/usao-sdny/pr/iranian-businessman-pleads-guilty-conspiracy-violate-us-sanctions-exporting-carbon

	by Exporting Marine Equipment from the United States to Iran [116]	
40	OFAC Advisory to the Maritime Petroleum Shipping Community [117]	September 4, 2019
41	Reward offer for information on the financial mechanisms of Iran's Islamic Revolutionary Guard Corps and its branches, including the IRGC-Qods Force [118]	September 4, 2019
42	Iranian Citizen Sentenced For Conspiring To Facilitate The Illegal Export Of Technology To Iran [119]	September 24, 2019
43	Turkish Bank Charged in Manhattan Federal Court for Its Participation in a Multibillion-Dollar Iranian Sanctions Evasion Scheme [120]	October 15, 2019
44	Columbus Man Sentenced to Prison for Illegally Exporting Goods to Iran [121]	October 24, 2019
45	Treasury and State Announce New Humanitarian Mechanism to Increase Transparency of Permissible Trade Supporting the Iranian People[122]	October 25, 2019
46	Memorandum on the Presidential Determination Pursuant to Section 1245(d)(4)(B) and (C) of the National Defense Authorization Act for Fiscal Year 2012[123]	October 25, 2019
47	Terrorist Financing Targeting Center Jointly Designates Network of Corporations, Banks, and Individuals related to Iran[124]	October 30, 2019
48	Two Individuals Plead Guilty for Working on Behalf of Iran [125]	November 6, 2019

[116] Available at: https://www.justice.gov/opa/pr/turkish-businessman-sentenced-27-months-imprisonment-conspiracy-violate-us-sanctions

[117] Available at: https://www.treasury.gov/resource-center/sanctions/Programs/Documents/iran_advisory_09032019.pdf

[118] Available at: https://www.state.gov/rewards-for-justice-reward-offer-for-information-on-the-financial-mechanisms-of-irans-islamic-revolutionary-guard-corps-and-its-branches-including-the-irgc-qods-force/

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49	Notice Regarding the Continuation of the National Emergency with Respect to Iran[126]	November 12, 2019
50	Iranian Businessman Sentenced to 46 Months in Prison for Violating U.S. Sanctions by Exporting Carbon Fiber from the United States to Iran [127]	November 14, 2019
51	Issuance of New and Amended Iran-related FAQs (No. 804 and 303) [128]	November 27, 2019
52	Issuance of two New Iran-related FAQs (No. 810 and 811) [129]	December 11, 2019
53	State Department Advisory on the Export of Metal Products to Iran [130]	December 16, 2019
54	Indonesian Citizen and 3 Indonesian Companies Charged with Violating U.S. Export Laws and Sanctions Against Iran [131]	December 17, 2019
55	One Iran-US Citizen and one Iranian Citizen Sentenced to 30 and 38 months for Connection with Work on behalf of Iran [132]	January 15, 2020
56	Iranian Export Company Executive Sentenced for Violating Sanctions Against Iran [133]	January 30, 2020
57	Four Texans, One New Yorker Arrested for Conspiracy to Sell Sanctioned Iranian Oil to Refinery in China for huge Profit [134]	February 11, 2020
58	Tennessee Man Pleads Guilty to Smuggling Goods from the United States to Iran [135]	March 3, 2020
58	Notice Regarding the Continuation of the National Emergency with Respect to Iran [136]	March 12, 2020

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59	Iranian National Convicted For Scheme To Evade U.S. Economic Sanctions By Illicitly Sending More Than $115 Million Through The U.S. Financial System [137]	March 16, 2020
60	Iranian National Extradited to the Western District of Texas for Illegally Exporting Military Sensitive Items from the U.S. to Iran [138]	March 17, 2020
61	Criminal Charges against Industrial Bank of Korea For Violations of Bank Secrecy Act [139]	April 20, 2020
62	Criminal Charges Filed Against Two Iranian Nationals for Violating Money Laundering & Sanctions Laws by Procuring Petroleum Tanker [140]	May 1, 2020
63	OFAC Guidance to Address Illicit Shipping and Sanctions Evasion Practices [141]	May 14, 2020
64	Founder and CEO of Iranian Financial Services Firm Extradited on Money Laundering, Wire Fraud, and Conspiracy Charges [142]	May 18, 2020
65	Justice Department Seeks Forfeiture of More than $20 Million in Assets Relating to Unlawful Use of U.S. Financial System to Evade and Violate Iranian Sanctions [143]	June 3, 2020
66	Warrant and Complaint Seek Seizure of All Iranian Gasoil Aboard Four Tankers Headed to Venezuela Based on Connection to IRGC [144]	July 2, 2020
67	Massachusetts Man Sentenced to 46 Months for Smuggling Goods from the United States to Iran [145]	July 16, 2020

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