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The rule of law at the national and international levels

Letter dated 8 May 2020 from the Permanent Representative of the Islamic Republic of Iran to the United Nations addressed to the Secretary-General

I have the honour to transmit to you a letter dated 8 May 2020 from Mohammad Javad Zarif, Minister for Foreign Affairs of the Islamic Republic of Iran (see annex).

Through the letter, he has brought to your kind attention several matters related to the unlawful withdrawal of the United States of America from the Joint Comprehensive Plan of Action and the unlawful imposition of its unilateral sanctions against the people and Government of the Islamic Republic of Iran, in clear violation of its obligations under international law, including Security Council resolution 2231 (2015).

I should be grateful if you would have the present letter and its annex circulated as a document of the General Assembly, under agenda item 83, and of the Security Council.

(Signed) Majid **Takht Ravanchi**Ambassador
Permanent Representative





Annex to the letter dated 8 May 2020 from the Permanent Representative of the Islamic Republic of Iran to the United Nations addressed to the Secretary-General

Further to my letter of 10 May 2018 (A/72/869-S/2018/453), I would like to bring to your attention several matters related to the unlawful withdrawal of the United States of America from the Joint Comprehensive Plan of Action (JCPOA) and the unlawful imposition of its unilateral sanctions against the people and Government of the Islamic Republic of Iran in clear violation of its obligations under international law. Most notably, I would like to bring to the attention of the Security Council – through you, in your capacity as the Secretary-General – matters related to the multiple, continuous and grave cases of violations of the Charter of the United Nations, in particular Article 25 thereof, thereby jeopardizing the credibility and the integrity of the United Nations and threatening the maintenance of international peace and security.

United States unilateral and unlawful withdrawal from the JCPOA

As you are well aware, on 8 May 2018, the President of the United States officially announced the unilateral withdrawal of the United States from the JCPOA, in material breach of Security Council resolution 2231 (2015), to which the JCPOA is annexed. Accordingly, the United States Administration terminated the participation of the United States in the JCPOA and reimposed all United States sanctions lifted in connection with the JCPOA, thus committing multiple cases of "significant non-performance" under the JCPOA, and in flagrant contravention of resolution 2231 (2015).

The unlawful United States act of unwarranted withdrawal from the JCPOA and the reimposition of its sanctions entail United States responsibility under the Charter and international law. The United States has violated resolution 2231 (2015), which was in fact submitted by the United States itself and was adopted unanimously by the Security Council on 20 July 2015. The United Nations needs to address swiftly the responsibility of the United States and hold it accountable for the consequences of its wrongful acts that fly in the face of the Charter and international law. Allowing impunity for the United States in this and other instances would greatly impair the credibility of the United Nations.

Indeed, it is now clear to all that the unlawful conduct of the United States constitutes a complete disregard for international law and the Charter of the United Nations; undermines the principle of peaceful settlement of disputes; endangers multilateralism and its institutions; indicates a regression to the failed and disastrous era of unilateralism; and encourages intransigence and illegality: all of which represent a clear threat to international peace and security.

United States malpractices to undermine the provisions of resolution 2231 (2015)

Resolution 2231 (2015) emphasizes that "the JCPOA is conducive to promoting and facilitating the development of normal economic and trade contacts and cooperation with Iran", urges "its full implementation on the timetable established in the JCPOA" and calls upon all Member States "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 refraining from actions that undermine implementation of commitments under the JCPOA".

Not only has the United States failed to honour its own commitments under the JCPOA, but it has also substantively obstructed the implementation of commitments

by the remaining JCPOA participants and other Member States. Since Donald Trump's assumption of office, the United States has once again resorted to the practice of unilateral coercive measures and has imposed 129 sanctions against Iran, inflicting irreparable harm to Iran's economy and its international business relations. These actions have a direct effect on Iran's private sector, cutting the revenues of ordinary Iranians and reducing the private sector's capacity for production and employment. Today, the economic situation is far worse as compared to the JCPOA status quo ante. The full list of these sanctions is enclosed with the present letter for further clarification (see enclosure).

The United States withdrawal from the JCPOA and its subsequent reimposition of a draconian, comprehensive and unilateral sanctions regime on Iran must raise the alarm for international peace and security. Indeed, it is the first time in United Nations history that a permanent member of the Security Council punishes United Nations Members for complying with a Security Council resolution.

It is high time for the Security Council and its members to guarantee the full implementation of the JCPOA by all sides. Rather than passively observing as the United States repeats such abusive patterns with full impunity, the Council must strongly condemn the United States for (re)imposing its illegal sanctions targeting the Iranian people in violation of the Charter, resolution 2231 (2015) and international law. The United States must be held responsible for these damages, and the Iranian nation must be compensated fully. The international community must ensure the implementation of and compliance with the JCPOA.

Iran's efforts in good faith to preserve the JCPOA

Following the unlawful withdrawal of the United States and the (re)imposition of its sanctions that had been lifted in accordance with the JCPOA, while reserving its immediate right under paragraph 26, my Government initiated the dispute resolution mechanism under paragraph 36 of the JCPOA on 10 May 2018. Acting in good faith, the Government of the Islamic Republic of Iran refrained from applying the "remedy" and did not immediately resort to "cease performing its commitments under the JCPOA", in order to enable the remaining JCPOA participants to make good on their promises.

As you asserted in your statement following the United States withdrawal from the JCPOA: "It is essential that all concerns regarding the implementation of the Plan be addressed through the mechanisms established in the JCPOA." Upon the request of remaining JCPOA participants, and the international community, while Iran was entitled to exercise its rights immediately after the United States unlawful withdrawal on 8 May 2018, my Government decided to pursue its rights within the framework of the JCPOA Joint Commission and continued the full implementation of the JCPOA. I trust you are aware of 15 consecutive International Atomic Energy Agency (IAEA) reports all verifying Iran's full compliance with its JCPOA commitments.³

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¹ 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".

² Statement by the Secretary-General on the Joint Comprehensive Plan of Action (JCPOA), 8 May 2018. Available at www.un.org/sg/en/content/sg/statement/2018-05-08/statement-secretary-general-joint-comprehensive-plan-action-jcpoa.

³ International Atomic Energy Agency (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) and S/2019/496 (14 June 2019).

As the official statement of the Islamic Republic of Iran (S/2015/550) issued following the adoption of resolution 2231 (2015) on 20 July 2015 clearly states:

Removal of nuclear-related sanctions and restrictive measures by the European Union and the United States would mean that transactions and activities referred to under the JCPOA could be carried out with Iran and its entities anywhere in the world without fear of retribution from extraterritorial harassment, and all persons would be able to freely choose to engage in commercial and financial transactions with Iran. It is clearly spelled out in the JCPOA that both the European Union and the United States will refrain from reintroducing or reimposing the sanctions and restrictive measures lifted under the JCPOA.

Regrettably, as the result of the reimposition of United States sanctions since May 2018, Iran has been deprived of the benefits of sanction-lifting under the JCPOA. Indeed, it was from the outset clear that the "reintroduction or reimposition, 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",⁵ which is also stipulated in paragraph 26 of the JCPOA.

Iran exercised restraint in good faith and exhausted all recourses under paragraph 36 for one full year after the United States unilateral withdrawal from the JCPOA. However, in the destructive atmosphere in the wake of Donald Trump's action on 8 May 2018, the E3/European Union utterly failed to honour their commitments and Iran was left with no recourse but to exercise its rights under paragraphs 26 and 36 of the JCPOA to cease performing its commitments in part on 8 May 2019. This action followed a full year of relentless efforts on the part of the Government of the Islamic Republic of Iran to exhaust the dispute resolution mechanism – which it officially and unequivocally initiated on 10 May 2018 – without having to resort to remedial measures under paragraph 36.

In order to manifest our good faith and serious desire to protect the JCPOA, I wish to underline once again that the Islamic Republic of Iran remains prepared to continue dialogue at all levels to ensure the full implementation of the JCPOA and will continue its full and effective cooperation with IAEA.

It is of substantive importance to note that Iran's peaceful nuclear energy programme is continuously scrutinized by the "most robust" monitoring and verification of IAEA, thereby making perceived non-proliferation risks materially irrelevant. Indeed, even the recent report by the Director General of IAEA, on 3 March 2020, states that "the Agency continues to verify the non-diversion of declared nuclear material at the nuclear facilities and locations outside facilities where nuclear material is customarily used (LOFs) declared by Iran under its Safeguards Agreement".6

I would like to reaffirm that, if the Iranian people's rights and benefits under the JCPOA are not fully compensated, it is Iran's unquestionable right – recognized under the JCPOA and resolution 2231 (2015) – to take appropriate action in response to the persistent unlawful actions of the United States.

⁴ 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.

⁵ 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.

⁶ IAEA, report by the Director General, "Verification and monitoring in the Islamic Republic of Iran in light of United Nations Security Council resolution 2231 (2015)", March 2020. Available at www.iaea.org/sites/default/files/20/03/gov2020-5.pdf.

United States ill-defined interpretations of resolution 2231 (2015)

States Members of the United Nations are obliged to comply with Security Council decisions adopted under Article 25. To behave otherwise would be to deprive this principal organ of its essential functions and powers under the Charter. For this reason, the Security Council referred in the fourteenth preambular paragraph of resolution 2231 (2015) to Article 25 of the Charter and underscored that "Member States are obligated under Article 25 of the Charter of the United Nations to accept and carry out the Security Council's decisions".

Drafting, adoption, interpretation and fulfilment of the Security Council resolutions have a particular framework and should be subjected to the principles and rules of international law. No State can place itself above the law (*legibus solutus*) by blocking all paths of implementation of resolution 2231 (2015) and by violating it through unacceptable illegal acts and arbitrary interpretations. The interpretation of Security Council resolutions also requires that other factors be taken into consideration. Resolution 2231 (2015) is the product of a voting process as provided for in Article 27 of the Charter, and the final text of that resolution, inter alia, annex A (JCPOA), represents the view of the Security Council in its totality.

Moreover, resolution 2231 (2015) is binding on all Member States, irrespective of their active or passive association with its formulation and adoption, or whether they have undermined or gravely violated its provisions by taking unilateral steps. It is ironic that the State that was involved in drafting and negotiating resolution 2231 (2015) has now turned into its main antagonist by gravely violating it and seeking to bully other States into adopting such reckless behaviour, too.

Statements by the representatives of the Security Council members on the occasion of adopting resolutions set the substantive context for their interpretation. The United States representative in the Security Council meeting of 20 July 2015 stated that "our work is far from finished. The international community must apply the same rigour to ensuring compliance with the Joint Comprehensive Plan of Action as we did to drafting and negotiating it. Implementation is everything". France's representative also specified that "it is now up to the Security Council to endorse the Vienna agreement and act as guarantor of its implementation". The essence of such a guarantee is not to enhance the powers of the Security Council, but to uphold the dignity and integrity of the Council and to preserve the objectives enshrined in resolution 2231 (2015) and its annex A, i.e. the JCPOA.

Here it is worth noting that resolution 2231 (2015) must be read within the context of the provisions set out in the JCPOA too (annex A to resolution 2231 (2015)). Indeed, in a sense, the resolution is tied to the JCPOA as if by an umbilical cord. Per resolution 2231 (2015), the Council "endorse[d] the JCPOA, and urge[d] its full implementation on the timetable established in the JCPOA". These provisions in the JCPOA sought to provide a "comprehensive" plan of action and also concluded a definitive and final solution to the entirely manufactured crisis over Iran's peaceful nuclear energy programme.

Further, it bears recalling that the second operative paragraph of resolution 2231 (2015), in which the Security Council "calls upon all Member 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

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⁷ Remarks of Ms. Power (United States of America), Security Council, seventieth year: 7488th meeting, Monday, 20 July 2015, New York (S/PV.7488).

⁸ Remarks of Mr. Delattre (France), Security Council, seventieth year: 7488th meeting, Monday, 20 July 2015, New York (S/PV.7488).

and by refraining from actions that undermine implementation of commitments under the JCPOA", obviously obliges States to refrain from applying the sanctions lifted under the JCPOA.

Having outlined the principal characteristics of Security Council resolution 2231 (2015) above, three distinct features of that resolution relevant to discerning its object and purpose must be observed:

First, resolution 2231 (2015) marks a "fundamental shift" in the Security Council's consideration of this issue and will contribute to building confidence in the exclusively peaceful nature of Iran's nuclear energy programme. Second, the solution embodied in resolution 2231 (2015) is conducive to promoting and facilitating the development of normal economic and trade contacts and cooperation with Iran. Third, with respect to the twelfth preambular paragraph of resolution 2231 (2015), the termination of provisions of previous resolutions and other measures are foreseen in this resolution, and Member States are asked to give due regard to these changes.

Statements by United States officials indicating an intention to take action against resolution 2231 (2015) are of grave concern and may lead the situation to enter uncontrollable circumstances. It is an acknowledged and well-documented fact that the ongoing efforts by the United States to unilaterally bring about substantial changes to resolution 2231 (2015) are not the first of their kind; the failed United States scheme in November 2019 to update the 2231 list was the last overt example. Resolution 2231 (2015) was adopted to terminate sanctions, not to extend those that had been imposed by previous and defunct resolutions. Resolution 2231 (2015) was explicitly designed and written not to be a sanctions resolution. Any initiation of action against resolution 2231 (2015) against this background will have serious consequences for the durability and sustainability of the agreed conditions.

Not only is the United States in grave violation of resolution 2231 (2015), but it is blatantly attempting illegal paths to reverse the resolution in absolute contempt for well-established principles of international law. A fundamental principle governing the international relations thus established is that a State which does not fulfil its own obligations cannot be recognized as retaining the rights which it claims to derive from the relationship. In this case, solely by withdrawing from the JCPOA, the United States has lost any right therein.

Therefore, I call upon the international community, and in particular the Security Council and the Secretary-General, to take all appropriate measures in order to counter these malicious endeavours by the United States Government which greatly undermine the provisions of resolution 2231 (2015). The United Nations should uphold its responsibility against the recent provocative actions of the United States.

As specified in the letter of the President of the Islamic Republic of Iran to his 4+1 counterparts on 8 May 2019, any new sanction or restriction by the Security Council is against the fundamental commitments made to the Iranian people. In such a scenario, Iran's options, as already notified to the remaining participants of the JCPOA, will be firm and the United States and any entity which may assist the United States – or acquiesce in its illegal behavior – would bear all responsibility.

As I stated almost 14 years ago before the Security Council, "the people and the Government of the Islamic Republic of Iran are not seeking confrontation and have always shown their readiness to engage in serious and result oriented negotiations based on mutual respect and on an equal footing. They have also shown, time and again, their resilience in the face of pressure, threat, injustice and imposition". 9 My

⁹ Security Council, sixty-first year: 5500th meeting, Monday, 31 July 2006, New York (S/PV.5500).

nation has already shown its good faith and full responsibility. Now, it is the turn of the international community to reciprocate. Accordingly, I urge the United Nations to hold the Government of the United States accountable for its unilateral and irresponsible conduct, which will detrimentally challenge the credibility of the Security Council and undermine the integrity of the Charter.

I should be grateful if you would have the present letter and its enclosure circulated as a document of the General Assembly and of the Security Council.

(Signed) M. Javad Zarif

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Enclosure

As Updated 7 May 2020

The United States Sanctions against Iran in Trump Administration

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
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

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.

Available at: https://www.treasury.gov/resource-center/sanctions/OFAC-Enforcement/Pages/2017/0726.aspx.

Available at: https://www.treasury.gov/resource-center/sanctions/OFAC-Enforcement/Pages/2017/0914.aspx.

Available at. https://www.treasury.gov/tesource-center/sanctions/OFAC-Enforcement/Fages/2017/0914.aspx

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

 $^{^9\} Available\ at:\ https://www.treasury.gov/resource-center/sanctions/OFAC-Enforcement/Pages/20171120.aspx.$

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.

 $^{^{13}\} Available\ at:\ https://www.treasury.gov/resource-center/sanctions/OFAC-Enforcement/Pages/20180510.aspx.$

Available at: https://www.treasury.gov/resource-center/sanctions/OFAC-Enforcement/Pages/20180515.aspx.
 Available at: https://www.treasury.gov/resource-center/sanctions/OFAC-Enforcement/Pages/20180522.aspx.

No.	Description	Date	
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	June 27, 2018	
	 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 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	
29	Addition of 9 Iranian individuals and 2 Iranian entities to the SDN List ²⁹	February 13, 2019	

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

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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.

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.

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

Vo.	Description	Date
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
88	Issuance of Executive Order 13876 (Imposing Sanctions against High Ranking Officials of Iran) ³⁸	June 24, 2019
9	Addition of 9 Iranian High Ranking Officials including the Supreme Leader to the OFAC's SDN List ³⁹	June 4, 2019
0	Addition of 5 Iranian individuals and 7 Iranian-related entities to the SDN List ⁴⁰	July 18, 2019
1	Addition of 1 Iran-related individual and 1 Iran-related entity to the SDN List ⁴¹	July 22, 2019
-2	Addition of Iran's Minister of Foreign Affairs to the SDN List ⁴²	July 31, 2019
3	Addition of 5 Iranian (or Iranian related) individuals and 5 Iranian (or Iranian-related) entities to the SDN List ⁴³	August 28, 2019
4	Addition of an Iranian vessel (ADRIAN DARYA 1) and its Indian Commander to the SDN ${\rm List}^{44}$	August 30, 2019
5	Addition of 3 Iranian entities to the SDN List ⁴⁵	September 3, 20

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 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.

No.	Description	Date
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
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

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

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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 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/.

 $^{^{61}\} Available\ at:\ https://www.treasury.gov/resource-center/sanctions/OFAC-Enforcement/Pages/20200220.aspx.$

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No.	Description	Date
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 9 Iranian (and Iranian related) entities to the SDN List ⁶⁴	March 18, 2020
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

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.

 $^{^{64}\} Available\ at:\ https://www.treasury.gov/resource-center/sanctions/OFAC-Enforcement/Pages/20200318.aspx.$

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.

The White House, OFAC, B.I.S, and DoJ Actions against Iran in Trump Administration

No.	Description	Date
1	\$1.19 Billion Penalty for Chinese Company's Export Violations to Iran 69	March 7, 2017
2	ZTE Corporation Agrees to Plead Guilty and Pay Over \$430.4 Million for Violating U.S. Sanctions by Sending U.SOrigin Items to Iran ⁷⁰	March 7, 2017
3	Iranian Member of International Cybercrime Conspiracy Sentenced to 10 Years in Prison for Selling Stolen Credit Card Information Online ⁷¹	March 9, 2017
4	ZTE Corporation Pleads Guilty for Violating U.S. Sanctions by Sending U.SOrigin Items to Iran ⁷²	March 22, 2017
5	Singapore Man Sentenced to 40 Months in Prison for Plot Involving Exports to Iran of U.S. Components ⁷³	April 27, 2017
6	Two Iranian Nationals Charged in Hacking of Vermont Software Company 74	July 17, 2017
7	Two Iranian Nationals Charged in Credit Card Fraud and Computer Hacking Conspiracy ⁷⁵	August 8, 2017
8	CEO of International Metallurgical Company Sentenced to 57 Months in Prison for Conspiring to Export Specialty Metals to Iran ⁷⁶	September 7, 2017
9	Notice Regarding the Continuation of the National Emergency with Respect to Iran 77	October 6, 2017
10	Turkish Banker Convicted of Conspiring to Evade U.S. Sanctions Against Iran and Other Offenses ⁷⁸	January 3, 2018
11	Commerce Department Moves Against Illicit Iran Aircraft Network 79	February 5, 2018
12	Notice Regarding the Continuation of the National Emergency with Respect to Iran 80	March 12, 2018

⁶⁹ Available at: https://www.commerce.gov/news/press-releases/2017/03/secretary-commerce-wilbur-l-ross-jr-announces-119-billion-penalty.

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⁷⁰ Available at: https://www.justice.gov/opa/pr/zte-corporation-agrees-plead-guilty-and-pay-over-4304-million-violating-us-sanctions-sending.

⁷¹ Available at: https://www.justice.gov/opa/pr/iranian-member-international-cybercrime-conspiracy-sentenced-10-years-prison-selling-stolen.

⁷² Available at: https://www.justice.gov/opa/pr/zte-corporation-pleads-guilty-violating-us-sanctions-sending-us-origin-items-iran.

⁷³ Available at: https://www.justice.gov/opa/pr/singapore-man-sentenced-40-months-prison-plot-involving-exports-iran-us-components.

⁷⁴ Available at: https://www.justice.gov/opa/pr/two-iranian-nationals-charged-hacking-vermont-software-company.

⁷⁵ Available at: https://www.justice.gov/opa/pr/two-iranian-nationals-charged-credit-card-fraud-and-computer-hacking-conspiracy.

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

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

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

⁷⁹ Available at: https://www.bis.doc.gov/index.php/documents/about-bis/newsroom/press-releases/2190-yegane-tdo-final-cleared-press-release/file.

⁸⁰ Available at: https://www.whitehouse.gov/presidential-actions/notice-regarding-continuation-national-emergency-respect-iran-2/.

No.	Description	Date
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 ⁸¹	March 20, 2018
14	Iranian Citizen Sentenced for Conspiring to Facilitate the Illegal Export of Technology to Iran ⁸²	March 20, 2018
15	Nine Iranians Charged With Conducting Massive Cyber Theft Campaign on Behalf of the Islamic Revolutionary Guard Corps ⁸³	March 23, 2018
16	Issuance of FinCEN Advisory about Iran ⁸⁴	May 10, 2018
17	Turkish Banker Sentenced to 32 Months for Conspiring to Violate U.S. Sanctions Against Iran and Other Offenses ⁸⁵	May 16, 2018
18	Two Individuals Charged for Acting as Illegal Agents of the Government of Iran 86	August 20, 2018
19	Canadian Sentenced to 3+ Years in Prison for Conspiracy to Export Restricted Goods and Technology to Iran ⁸⁷	August 22, 2018
20	Withdrawal from Treaty of Amity ⁸⁸	October 3, 2018
21	Notice Regarding the Continuation of the National Emergency with Respect to Iran 89	October 8, 2018
22	Presidential Memorandum for the Secretary of State, the Secretary of the Treasury, and the Secretary of Energy 90	October 31, 2018
23	Iranian National Pleads Guilty to Conspiring to Illegally Export Products From the United States to Iran ⁹¹	November 8, 2018
24	Two Iranian Men Indicted for Deploying Ransomware to Extort Hospitals, Municipalities, and Public Institutions, Causing Over \$30 Million in Losses 92	November 28, 2018

⁸¹ Available at: https://www.justice.gov/opa/pr/iranian-national-arrested-scheme-evade-us-economic-sanctions-illicitly-sending-more-115.

⁸² Available at: https://www.justice.gov/opa/pr/iranian-citizen-sentenced-conspiring-facilitate-illegal-export-technology-iran.

⁸³ Available at: https://www.justice.gov/opa/pr/nine-iranians-charged-conducting-massive-cyber-theft-campaign-behalf-islamic-revolutionary.

⁸⁴ Available at: https://www.fincen.gov/news/news-releases/fincen-issues-advisory-iranian-regimes-illicit-and-malign-activities-and.

⁸⁵ Available at: https://www.justice.gov/opa/pr/turkish-banker-sentenced-32-months-conspiring-violate-us-sanctions-against-iran-and-other.

 $^{^{86}\} Available\ at:\ https://www.justice.gov/opa/pr/two-individuals-charged-acting-illegal-agents-government-iran.$

⁸⁷ Available at: https://www.justice.gov/opa/pr/canadian-sentenced-3-years-prison-conspiracy-export-restricted-goods-and-technology-iran.

⁸⁸ Available at: https://www.state.gov/remarks-to-the-media-3/.

⁸⁹ Available at: https://www.whitehouse.gov/briefings-statements/text-notice-continuation-national-emergency-respect-iran/.

⁹⁰ Available at: https://www.whitehouse.gov/presidential-actions/presidential-memorandum-secretary-state-secretary-treasury-secretary-energy-4/.

⁹¹ Available at: https://www.justice.gov/opa/pr/iranian-national-pleads-guilty-conspiring-illegally-export-products-united-states-iran.

⁹² Available at:https://www.justice.gov/opa/pr/two-iranian-men-indicted-deploying-ransomware-extort-hospitals-municipalities-and-public.

No.	Description	Date
25	\$3 Million Reward Announced for Information Leading to Arrest of Iranian Tied to Illegal Procurement of U.S. Technology ⁹³	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 94	February 13, 2019
27	Notice Regarding the Continuation of the National Emergency with Respect to Iran 95	March 12, 2019
28	Australian National Sentenced to Prison Term For Exporting Electronics to Iran 96	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 97	April 9, 2019
30	UniCredit Bank AG Agrees to Plead Guilty for Illegally Processing Transactions in Violation of Iranian Sanctions ⁹⁸	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 ⁹⁹	April 29, 2019
32	Two Indictments Unsealed Charging Iranian Citizen with Violating U.S. Export Laws and Sanctions Against Iran 100	June 4, 2019
33	Morris County Woman Admits Conspiring With Iranian National To Illegally Export Aircraft Components To Iran ¹⁰¹	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 102	July 16, 2019
35	Iranian Export Company Executive Pleads Guilty to Violating U.S. Sanctions Against Iran ¹⁰³	July 19, 2019
36	Publication of Iran-related Civil Aviation Industry Advisory ¹⁰⁴	July 23, 2019

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⁹³ 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.

⁹⁴ Available at: https://www.justice.gov/opa/pr/former-us-counterintelligence-agent-charged-espionage-behalf-iran-four-iranians-charged-cyber.

⁹⁵ Available at: https://www.whitehouse.gov/briefings-statements/text-notice-continuation-national-emergency-respect-iran-2/.

⁹⁶ Available at: https://www.justice.gov/usao-dc/pr/australian-national-sentenced-prison-term-exporting-electronics-iran.

⁹⁷ Available at: https://www.justice.gov/opa/pr/standard-chartered-bank-admits-illegally-processing-transactions-violation-iranian-sanctions.

⁹⁸ Available at: https://www.justice.gov/opa/pr/unicredit-bank-ag-agrees-plead-guilty-illegally-processing-transactions-violation-iranian.

⁹⁹ Available at: https://s3.amazonaws.com/public-inspection.federalregister.gov/2019-10472.pdf.

¹⁰⁰ 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.

¹⁰¹ Available at: https://www.justice.gov/usao-nj/pr/morris-county-woman-admits-conspiring-iranian-national-illegally-export-aircraft.

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

¹⁰³ Available at: https://www.justice.gov/usao-ndny/pr/iranian-export-company-executive-pleads-guilty-violating-us-sanctions-against-iran.

¹⁰⁴ Available at: https://www.treasury.gov/resource-center/sanctions/OFAC-Enforcement/Pages/20190723.aspx.

No.	Description	Date
37	Iranian Citizen Pleads Guilty to Conspiring to Facilitate the Illegal Export of Technology to Iran ¹⁰⁵	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 106	August 29, 2019
39	Turkish Businessman Sentenced to 27 Months Imprisonment for Conspiracy to Violate U.S. Sanctions by Exporting Marine Equipment from the United States to Iran ¹⁰⁷	September 3, 2019
40	OFAC Advisory to the Maritime Petroleum Shipping Community 108	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 ¹⁰⁹	September 4, 2019
42	Iranian Citizen Sentenced For Conspiring to Facilitate The Illegal Export of Technology To Iran ¹¹⁰	September 24, 2019
43	Turkish Bank Charged in Manhattan Federal Court for Its Participation in a Multibillion-Dollar Iranian Sanctions Evasion Scheme ¹¹¹	October 15, 2019
44	Columbus Man Sentenced to Prison for Illegally Exporting Goods to Iran 112	October 24, 2019
45	Treasury and State Announce New Humanitarian Mechanism ¹¹³	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 ¹¹⁴	October 25, 2019
47	Terrorist Financing Targeting Center Jointly Designates Network of Corporations, Banks, and Individuals related to Iran ¹¹⁵	October 30, 2019
48	Two Individuals Plead Guilty for Working on Behalf of Iran ¹¹⁶	November 6, 2019
49	Notice Regarding the Continuation of the National Emergency with Respect to Iran 117	November 12, 2019

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

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

¹⁰⁷ Available at: https://www.justice.gov/opa/pr/turkish-businessman-sentenced-27-months-imprisonment-conspiracy-violate-us-sanctions.

¹⁰⁸ Available at: https://www.treasury.gov/resource-center/sanctions/Programs/Documents/iran_advisory_09032019.pdf.

¹⁰⁹ 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/.

¹¹⁰ Available at: https://www.justice.gov/usao-mn/pr/iranian-citizen-sentenced-conspiring-facilitate-illegal-export-technology-iran-0.

¹¹¹¹ Available at: https://www.justice.gov/opa/pr/turkish-bank-charged-manhattan-federal-court-its-participation-multibillion-dollar-iranian.

¹¹² Available at: https://www.justice.gov/opa/pr/columbus-man-sentenced-prison-illegally-exporting-goods-iran.

 $^{^{113}\} Available\ at:\ https://home.treasury.gov/news/press-releases/sm804.$

Available at: https://www.whitehouse.gov/presidential-actions/memorandum-presidential-determination-pursuant-section-1245d4b-c-national-defense-authorization-act-fiscal-year-2012/.

¹¹⁵ Available at: https://home.treasury.gov/news/press-releases/sm813.

¹¹⁶ Available at: https://www.justice.gov/opa/pr/two-individuals-plead-guilty-working-behalf-iran.

¹¹⁷ Available at: https://www.whitehouse.gov/briefings-statements/text-notice-continuation-national-emergency-respect-iran-3/.

No.	Description	Date
50	Iranian Businessman Sentenced to 46 Months in Prison for Violating U.S. Sanctions by Exporting Carbon Fiber from the United States to Iran 118	November 14, 2019
51	Issuance of New and Amended Iran-related FAQs (No. 804 and 303) ¹¹⁹	November 27, 2019
52	Issuance of two New Iran-related FAQs (No. 810 and 811) ¹²⁰	December 11, 2019
53	State Department Advisory on the Export of Metal Products to Iran 121	December 16, 2019
54	Indonesian Citizen and 3 Indonesian Companies Charged with Violating U.S. Export Laws and Sanctions Against Iran ¹²²	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 ¹²³	January 15, 2020
56	Iranian Export Company Executive Sentenced for Violating Sanctions Against Iran ¹²⁴	January 30, 2020
57	Four Texans, One New Yorker Arrested for Conspiracy to Sell Sanctioned Iranian Oil to Refinery in China for huge Profit ¹²⁵	February 11, 2020
58	Tennessee Man Pleads Guilty to Smuggling Goods from the United States to Iran ¹²⁶	March 3, 2020
59	Notice Regarding the Continuation of the National Emergency with Respect to Iran 127	March 12, 2020
60	Iranian National Convicted For Scheme To Evade U.S. Economic Sanctions By Illicitly Sending More Than \$115 Million Through The U.S. Financial System 128	March 16, 2020
61	Iranian National Extradited to the Western District of Texas for Illegally Exporting Military Sensitive Items from the U.S. to Iran ¹²⁹	March 17, 2020
62	Criminal Charges against Industrial Bank of Korea For Violations of Bank Secrecy Act 130	April 20, 2020
63	Criminal Charges Filed Against Two Iranian Nationals for Violating Money Laundering & Sanctions Laws by Procuring Petroleum Tanker ¹³¹	May 1, 2020

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¹¹⁸ Available at: https://www.justice.gov/opa/pr/iranian-businessman-sentenced-46-months-prison-violating-us-sanctions-exporting-carbon-fiber.

¹¹⁹ Available at: https://www.treasury.gov/resource-center/sanctions/OFAC-Enforcement/Pages/20191127.aspx.

¹²⁰ Available at: https://www.treasury.gov/resource-center/faqs/sanctions/Pages/faq_iran.aspx#810.

¹²¹ Available at: https://www.state.gov/state-department-advisory-on-the-export-of-metal-products-to-iran.

Available at: https://www.justice.gov/opa/pr/two-individuals-sentenced-connection-work-behalf-iran\.

¹²³ Available at: https://www.justice.gov/opa/pr/indonesian-citizen-and-three-indonesian-companies-charged-violating-us-export-laws-and.

¹²⁴ Available at: https://www.justice.gov/usao-edny/pr/iranian-export-company-executive-sentenced-violating-us-sanctions-against-iran.

¹²⁵ Available at: https://www.justice.gov/usao-edny/pr/four-texans-one-new-yorker-arrested-conspiracy-sell-sanctioned-iranian-oil-refinery-china.

¹²⁶ Available at: https://www.justice.gov/usao-nh/pr/tennessee-man-pleads-guilty-smuggling-goods-united-states-iran.

¹²⁷ Available at: https://www.whitehouse.gov/briefings-statements/text-notice-continuation-national-emergency-respect-iran-4/.

¹²⁸ Available at: https://www.justice.gov/usao-sdny/pr/iranian-national-convicted-scheme-evade-us-economic-sanctions-illicitly-sending-more.

¹²⁹ Available at: https://www.justice.gov/opa/pr/iranian-national-extradited-western-district-texas-illegally-exporting-military-sensitive.

¹³⁰ Available at: https://www.justice.gov/usao-sdny/pr/manhattan-us-attorney-announces-criminal-charges-against-industrial-bank-korea.

¹³¹ Available at: https://www.justice.gov/opa/pr/criminal-charges-filed-against-two-iranian-nationals-violating-money-laundering-sanctions.