



## The FATF Keeps Iran on Blacklist While Ignoring Proliferation Financing Threat

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At its plenary meeting in Paris this week, the Financial Action Task Force (FATF) decided to maintain Iran's status as a high-risk jurisdiction for money laundering and terrorist financing, while continuing to waive the most severe penalties for this listing.<sup>1</sup> The 38-member body sets global standards on how to combat these threats to the international financial system, through a series of recommended measures and public warnings about doing business with high risk countries.<sup>2</sup>

Iran has been included on the FATF's "blacklist" since 2008. In today's public statement, the FATF determined that the steps taken by Iran since 2016, following the implementation of the nuclear agreement, are not sufficient to merit a change in this status. According to today's statement, the FATF "urgently expects Iran to proceed swiftly in the reform path" by addressing remaining deficiencies in its laws against money laundering and terrorist financing.<sup>3</sup> For the first time, the FATF publicly detailed these deficiencies, notably not "adequately criminalizing terrorist financing."<sup>4</sup> The body

### What is the FATF?

A 38-member intergovernmental body established in 1989 that sets global standards to combat money laundering and terrorist and proliferation financing to protect the integrity of the international financial system. The FATF holds three plenary meetings a year to review states' progress in implementing its recommendations and issues public warnings against [high-risk, non-cooperative jurisdictions](#) and jurisdictions of strategic weakness.

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<sup>1</sup> "Public Statement," Financial Action Task Force, February 23, 2018. (<http://www.fatf-gafi.org/publications/high-riskandnon-cooperativejurisdictions/documents/public-statement-february-2018.html>)

<sup>2</sup> "Who we are," Financial Action Task Force. (<http://www.fatf-gafi.org/about/whoweare/>)

<sup>3</sup> "Public Statement," Financial Action Task Force, February 23, 2018. (<http://www.fatf-gafi.org/publications/high-riskandnon-cooperativejurisdictions/documents/public-statement-february-2018.html>)

<sup>4</sup> Ibid.

warned that it would take further steps at its June meeting, "depending upon Iran's progress."<sup>5</sup>

Notably absent from this and previous FATF public statements is any mention of the threat to the international financial system posed by proliferation in and from Iran, and Iran's willingness to end this threat.

## Iran's History with the FATF

Since 2007, the FATF has named Iran as a threat to the international financial system because of its lack of comprehensive anti-money laundering (AML) and combatting the financing of terrorism (CFT) regimes.<sup>6</sup> The FATF stepped up this warning in 2008, calling on its members to conduct enhanced due diligence (EDD) when dealing with Iran and urging financial institutions around the world to do the same.<sup>7</sup> Such enhanced due diligence includes robust monitoring of business relationships and transactions with Iranian entities.<sup>8</sup>

In February 2009, the FATF ratcheted up pressure by imposing countermeasures against Iran after it failed to address meaningfully its AML/CFT weaknesses.<sup>9</sup> Countermeasures expand on existing due diligence requirements and may include: enhanced reporting and monitoring of business relationships and transactions; preventing Iranian banks from establishing subsidiary branches;

### Iran's FATF Milestones

- **October 2007:** The FATF first cites Iran for its lack of a comprehensive AML/CFT regime and *advises* financial institutions to conduct enhanced due diligence.
- **February 2008:** Iran is listed for its AML/CFT regime deficiencies and the FATF *calls for* enhanced due diligence.
- **February 2009:** Countermeasures are imposed for Iran's failure to meaningfully address its AML/CFT deficiencies.
- **June 2016:** Countermeasures are suspended for 12 months after Iran adopts a FATF-devised Action Plan.
- **Since June 2017:** The FATF continues to suspend countermeasures pending its ongoing evaluation of Iran's Action Plan implementation.

<sup>5</sup> Ibid.

<sup>6</sup> "FATF Statement on Iran," Financial Action Task Force, October 11, 2007. (<https://www.anti-moneylaundering.org/Document/Default.aspx?DocumentUid=3DC54B60-349A-407E-B72C-4A626581880D>)

<sup>7</sup> "FATF Statement concerning Iran, Uzbekistan, Turkmenistan, Pakistan and São Tomé and Príncipe" Financial Action Task Force, February 26, 2009. (<http://www.fatf-gafi.org/publications/high-riskandnon-cooperativejurisdictions/documents/fatfstatementconcerningiranuzbekistanturkmenistanpakistanandsaotomeandprincipe-26february2009.html>)

<sup>8</sup> "FATF Public Statement," Financial Action Task Force, October 19, 2012. (<http://www.fatf-gafi.org/media/fatf/documents/FATF%20Public%20Statement%2019%20October%202012.pdf>)

<sup>9</sup> "FATF Statement concerning Iran, Uzbekistan, Turkmenistan, Pakistan and São Tomé and Príncipe," Financial Action Task Force, February 26, 2009. (<http://www.fatf-gafi.org/countries/n-r/pakistan/documents/fatfstatementconcerningiranuzbekistanturkmenistanpakistanandsaotomeandprincipe-26february2009.html>)

limiting business relationships; and requiring banks to review and terminate correspondent accounts.<sup>10</sup> The FATF specifically warned countries to protect against Iran's use of correspondent banking relationships to bypass or evade these countermeasures.

The timing of this increased pressure from the FATF tracked with increased international concern about Iran's nuclear program and its financing. In 2009, the U.N. Security Council adopted resolution 1929, which called upon countries "to take appropriate measures that prohibit in their territories the opening of new branches, subsidiaries, or representative offices of Iranian banks" if these activities "could contribute to Iran's proliferation-sensitive nuclear activities or the development of nuclear weapon delivery systems."<sup>11</sup>

#### The FATF's Enhanced Restrictions

**Enhanced Due Diligence (EDD):** Increases the degree to which business relationships are monitored for unusual or suspicious activities and mandates more robust reporting, including by filing Suspicious Transaction Reports (STRs).

**Countermeasures (CMs):** Imposed on high-risk countries, including those subject to U.N. sanctions. CMs include applying elements of EDD such as prohibiting banks in countries of concern from opening foreign subsidiaries and reviewing, amending, limiting, and/or terminating relationships with banks in such countries.

Despite this pressure, Iran failed to remedy the deficiencies in its AML/CFT regime and has remained on the the FATF "blacklist" as a "high risk and non-cooperative jurisdiction." The listing, along with the broad economic sanctions regime against Iran that targeted the country's banking, shipping, and energy sectors, left it increasingly isolated from the international financial system.

### Iran's "High-Level Commitment"

The 2015 nuclear agreement, or Joint Comprehensive Plan of Action (JCPOA), marked a turning point in Iran's relationship with the world, and with the FATF. In June 2016, the FATF welcomed Iran's "high-level political commitment to an Action Plan to address its strategic AML/CFT deficiencies."<sup>12</sup> Iran also agreed to seek technical assistance on how to implement the plan. The

<sup>10</sup> "High-risk and non-cooperative jurisdictions," Financial Action Task Force. ([http://www.fatf-gafi.org/publications/high-riskandnon-cooperativejurisdictions/more/more-on-high-risk-and-non-cooperative-jurisdictions.html?hf=10&b=0&s=desc\(fatf\\_releasedate\)\)](http://www.fatf-gafi.org/publications/high-riskandnon-cooperativejurisdictions/more/more-on-high-risk-and-non-cooperative-jurisdictions.html?hf=10&b=0&s=desc(fatf_releasedate))))

<sup>11</sup> "Security Council Resolution 1929 (2010)," United Nations Security Council, June 9, 2010. ([http://dag.un.org/bitstream/handle/11176/14003/S\\_RES\\_1929%282010%29-EN.pdf?sequence=3&isAllowed=y](http://dag.un.org/bitstream/handle/11176/14003/S_RES_1929%282010%29-EN.pdf?sequence=3&isAllowed=y))

<sup>12</sup> "Public Statement," Financial Action Task Force, June 24, 2016. (<http://www.fatf-gafi.org/countries/d-i/iran/documents/public-statement-june-2016.html>); "Islamic Republic of Iran: Selected Issues," International Monetary Fund - Middle East and Central Asia Department, February 27, 2017.

(footnote continued)

FATF rewarded Iran's new posture by suspending for twelve months the countermeasures in place since 2009, and further suspending the countermeasures at plenary meetings in November 2017 and February 2018.<sup>13</sup> However, Iran still is on the FATF's list as a high-risk jurisdiction and enhanced due diligence requirements remain in place.

Since 2016, Iran reportedly has engaged in several rounds of technical discussions with experts from around the world, including from the United States.<sup>14</sup> Iran's International Monetary Fund representative has sought technical assistance to implement proper AML standards in Iran's banking sector,<sup>15</sup> and the United Kingdom has provided assistance to Iranian banks on how to implement these standards.<sup>16</sup> In 2016, Iran became an observer in the Eurasian Group, or EAG, a FATF-style regional body that assists members in implementing AML/CFT standards.<sup>17</sup>

#### Provisions of Iran's FATF Action Plan

- Criminalization of money laundering and terrorist financing offenses.
- Identifying and freezing terrorist financing assets in line with relevant UNSCRs.
- Ensuring proper AML/CFT requirements for the financial sector, including preventive measures and Customer Due Diligence (CDD).
- Enhancing the role of Iran's financial intelligence unit and the process for reporting suspicious transactions.
- Ratifying and implementing the U.N Convention against Transnational Organized Crime (UNTOC) and the International Convention for the Suppression of the Financing of Terrorism (ICSFT).
- Improving regulation of alternative remittance systems, wire transfers, and cash couriers.
- Adopting legislation and procedures to provide for the freezing and confiscation of laundered property and proceeds, and property of corresponding value.

(<http://www.imf.org/en/Publications/CR/Issues/2017/02/27/Islamic-Republic-of-Iran-Selected-Issues-44708>)

<sup>13</sup> "Public Statement," Financial Action Task Force, June 24, 2016. (<http://www.fatf-gafi.org/countries/d-i/iran/documents/public-statement-june-2016.html>); "Public Statement," Financial Action Task Force, June 23, 2017. (<http://www.fatf-gafi.org/publications/high-riskandnon-cooperativejurisdictions/documents/public-statement-june-2017.html>); "Public Statement," Financial Action Task Force, November 3, 2017. (<http://www.fatf-gafi.org/countries/d-i/iran/documents/public-statement-november-2017.html>); "Public Statement," Financial Action Task Force, February 23, 2018. (<http://www.fatf-gafi.org/publications/high-riskandnon-cooperativejurisdictions/documents/public-statement-february-2018.html>)

<sup>14</sup> "FATF Iran Decision and US Tactics," Financial Tribune, February 8, 2018. (<https://financialtribune.com/articles/economy-business-and-markets/81662/fatf-iran-decision-and-us-tactics-oped>)

<sup>15</sup> "Islamic Republic of Iran: 2016 Article IV consultation," International Monetary Fund, p. 15, February 2017. (<https://www.imf.org/~media/Files/Publications/CR/2017/cr1762.ashx>)

<sup>16</sup> "2018 Interview: Iran FIU Boss on AML Reform, Beneficial Ownership, and Winning Over U.K. Banks," KYC360, January 1, 2018. (<https://kyc360.com/article/2018-interview-iran-fiu-boss-aml-reform-corporate-secrecy-winning-uk-banking/>)

<sup>17</sup> "Observer states and organizations," The Eurasian Group on Combating Money Laundering and Financing of Terrorism. (<http://www.eurasiangroup.org/observers.php>)

The Action Plan also spurred Iran to undertake four key legislative efforts. In January, Iran's Parliament approved a bill to join the U.N. Convention against Transnational Organized Crime (UNTOC).<sup>18</sup> A bill to join the International Convention of the Suppression of Terrorism Financing (ICSFT) is still pending in Parliament.

The two other regulatory efforts involve adapting Iran's current AML and CFT laws to align with the FATF standards. A bill amending Iran's Anti-Money Laundering Act was approved by Parliament on January 10, 2018.<sup>19</sup> A bill amending Iran's Countering Financing of Terrorism Act is more domestically controversial and has not yet been approved by Parliament.<sup>20</sup> It lays out a legal basis for confiscating terrorist assets, determines what constitutes terrorist offenses, and establishes enhanced monitoring and suspicious report transaction mechanisms.<sup>21</sup>

However, for both the U.N. conventions and its domestic CFT law and proposed amendments, Iran expressly exempts support for what it deems "actions taken by nations, groups, or liberation organizations for the purpose of putting an end to foreign occupation, colonialism, and racism."<sup>22</sup> In practical terms, this means exceptions to continue funding Hezbollah and Hamas<sup>23</sup> – both of which are designated as terrorist organizations by the United States. Maintaining such exceptions would not meet FATF norms.<sup>24</sup> Another issue may complicate Iran's ability to implement fully the FATF Action Plan: the entrenchment in the Iranian economy of the military and the Islamic Revolutionary Guard Corps (IRGC), parts of which remain subject to U.N. sanction.

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<sup>18</sup> Ghanbar Naderi, "Iran joins UN Convention against Transnational Organized Crime," Press TV, January 28, 2018. (<http://www.presstv.com/Detail/2018/01/28/550483/Iran-UN-Convention-against-Transnational-Organized-Crime>)

<sup>19</sup> "Iran AML Bill Amendment Approved," Financial Tribune, January 25, 2018. (<https://financialtribune.com/articles/economy-business-and-markets/79706/iran-aml-bill-amendment-approved>)

<sup>20</sup> "Submission the Bill of Amendment to the Countering Financing of Terrorism Act to the Parliament," Iranian Ministry of Economic Affairs and Finance, 2017. (<http://iranamlen.mefa.ir/Portal/home/?news/131154/168041/404836/Submission-the-Bill-of-Amendment-to-the-Countering-Financing-of-Terrorism-Act-to-the-Parliament>)

<sup>21</sup> "Countering Financing of Terrorism Bill," Iranian Ministry of Economic Affairs and Finance, 2011. (<http://iranamlen.mefa.ir/Portal/file/?93902/CFT-Bill-final-English-May-2011.pdf>)

<sup>22</sup> "Countering Financing of Terrorism Bill," Iranian Ministry of Economic Affairs and Finance, p. 3, 2011. (<http://iranamlen.mefa.ir/Portal/file/?93902/CFT-Bill-final-English-May-2011.pdf>)

<sup>23</sup> "Countering Financing of Terrorism Bill," Iranian Ministry of Economic Affairs and Finance, 2011. (<http://iranamlen.mefa.ir/Portal/file/?93902/CFT-Bill-final-English-May-2011.pdf>)

<sup>24</sup> "Public Statement," Financial Action Task Force, February 23, 2018. (<http://www.fatf-gafi.org/publications/high-riskandnon-cooperativejurisdictions/documents/public-statement-february-2018.html>)

Iran's Action Plan expired on January 31, 2018 with "a majority of the action items remaining incomplete," according to today's FATF statement.<sup>25</sup> The statement went on to specifically list the nine (of ten) steps that Iran has failed to take. These include "adequately criminalizing terrorist financing" and "identifying and freezing terrorist assets" in line with UNSCRs.<sup>26</sup> For now, Iran avoids the reimposition of the countermeasures suspended in 2016. But Iran's continued failure to follow through at a technical level on its commitment to AML/CFT reform could lead to the reimposition of countermeasures when FATF meets in June. This step is advocated by some members of Congress and by the advocacy group United Against a Nuclear Iran (UANI).<sup>27</sup>

## FATF and Proliferation Financing

Beginning in 2008, the FATF expanded its mandate to include combatting proliferation finance. It has taken incremental steps on the issue since then, publishing a series of reports and amending its recommendations to provide guidance to its members and financial institutions.<sup>28</sup> Recommendation 7 is specific to proliferation finance, providing guidance on the implementation of "Targeted financial sanctions related to proliferation" in order to comply with U.N. Security Council resolutions (UNSCRs).<sup>29</sup>

### How Does the FATF Define Proliferation Financing?

*The act of providing funds or financial services which are used, in whole or in part, for the manufacture, acquisition, possession, development, export, trans-shipment, brokering, transport, transfer, stockpiling or use of nuclear, chemical or biological weapons and their means of delivery and related materials (including both technologies and dual use goods used for non-legitimate purposes), in contravention of national laws or, where applicable, international obligations.*

<sup>25</sup> Ibid.

<sup>26</sup> Ibid.

<sup>27</sup> "Chairman Royce Urges Action to Protect Int'l Financial System from Iran," House Committee on Foreign Affairs, Press Release, January 25, 2018. (<https://foreignaffairs.house.gov/press-release/chairman-royce-urges-action-protect-intl-financial-system-iran/>)

<sup>28</sup> "The FATF Recommendations: International Standards on Combating Money Laundering and the Financing of Terrorism and Proliferation," Financial Action Task Force, p. 7, November 2017. (<http://www.fatf-gafi.org/media/fatf/documents/recommendations/pdfs/FATF%20Recommendations%202012.pdf>)

<sup>29</sup> "The FATF Recommendations: International Standards on Combating Money Laundering and the Financing of Terrorism and Proliferation," Financial Action Task Force, p. 11, November 2017. (<http://www.fatf-gafi.org/media/fatf/documents/recommendations/pdfs/FATF%20Recommendations%202012.pdf>)



The FATF defines proliferation finance within the framework established by UNSCRs, including resolution 1540 mandating export controls to target illicit trafficking and related financing, and resolutions targeting specific countries of proliferation concern, including Iran.<sup>30</sup>

Yet proliferation finance has not been a FATF priority, despite the growing nuclear threat from North Korea and Iran (through 2015). For example, Iranian proliferation was never referenced in a FATF public statement as a reason for the country's classification as a high risk jurisdiction, even at the height of the nuclear crisis. And the threat from North Korean proliferation was mentioned for the first time in 2016, after the country had tested four nuclear weapons and countless nuclear-capable missiles.<sup>31</sup>

### Iran's Ongoing Proliferation Threat

As a result of the JCPOA, a series of UNSCRs on Iran and their provisions related to proliferation financing were terminated and replaced by resolution 2231.<sup>32</sup> This resolution endorses the nuclear agreement but also maintains restrictions on Iran's military and ballistic missile programs, including targeted financial sanctions against several dozen Iranian entities.<sup>33</sup>

#### The Evolution of FATF's Efforts to Address Proliferation Financing

- **June 2008:** Publishes a [typology report on proliferation financing](#).
- **October 2008:** Creates the Working Group on Terrorist Financing and Money Laundering Project Team on Proliferation Financing.
- **February 2010:** Publishes a status report entitled "[Combating Proliferation Financing](#)."
- **February 2012:** Publishes [revised recommendations](#), adding Recommendation 7, "Targeted financial sanctions related to proliferation," and an interpretive note; issues a Best Practices Paper to Recommendation 2 entitled "[Sharing among domestic competent authorities information related to the financing of proliferation](#)."
- **June 2013:** Issues guidance on proliferation finance entitled "[The Implementation of Financial Provisions of United Nations Security Council Resolutions to Counter the Proliferation of Weapons of Mass Destruction](#)."

The proliferation threat from Iran has not disappeared as a result of the nuclear agreement. Rather, the nuclear proliferation threat has been reduced and contained for a period of time, while the missile proliferation threat expands.

<sup>30</sup> "Combating Proliferation Financing: A Status Report on Policy Development and Consultation," Financial Action Task Force, p. 16, February 2010. (<http://www.fatf-gafi.org/media/fatf/documents/reports/Status-report-proliferation-financing.pdf>)

<sup>31</sup> "Public Statement," Financial Action Task Force, June 24, 2016. (<http://www.fatf-gafi.org/countries/d-i/iran/documents/public-statement-june-2016.html>); "North Korea Nuclear Milestones – 1962-2017," Wisconsin Project on Nuclear Arms Control, September 29, 2017. (<http://www.wisconsinproject.org/north-korea-nuclear-milestones/>)

<sup>32</sup> "Background," U.N Security Council resolution 2231 (2015), United Nations. (<http://www.un.org/en/sc/2231/>)

<sup>33</sup> U.N Security Council resolution 2231 (2015), United Nations, pp. 39, 99, July 20, 2015. ([http://www.un.org/en/ga/search/view\\_doc.asp?symbol=S/RES/2231\(2015\)](http://www.un.org/en/ga/search/view_doc.asp?symbol=S/RES/2231(2015)))

Iran continues to develop its missile arsenal in defiance of resolution 2231, including by launching as many as 23 ballistic missiles since July 2015, according to some estimates.<sup>34</sup> Iran claims that such tests do not violate the resolution because these missiles were not explicitly "designed to be capable of delivering nuclear weapons," as the resolution specifies. The intertwined history of Iran's nuclear and ballistic missile development belies this claim, as do regular assessments from the U.S. intelligence community that "Iran's ballistic missiles are inherently capable of delivering WMD."<sup>35</sup>

In addition, Iran continues to rely on overseas procurement to advance its missile program, and thus is exploiting the international financial system to do so. A June 2016 German intelligence report noted "a further increase in the already considerable procurement efforts in connection with Iran's ambitious missile technology program."<sup>36</sup> And in 2017, the German government reported that Iran's "attempts to acquire proliferation-sensitive material for missile technology/the missile programme, which is not covered by the Joint Comprehensive Plan of Action, remained about the same."<sup>37</sup> Another German intelligence report described the global reach of Iranian procurement, which uses front companies in the United Arab Emirates, Turkey, and China to facilitate procurement and evade international restrictions.<sup>38</sup>

#### FATF Guidance for Combatting Proliferation Financing

- **Implementation of Targeted Financial Sanctions** is required in order to comply with WMD UNSCRs. States must establish authorities to propose entities to the Security Council for designation; establish mechanisms to implement and enforce sanctions; and freeze (and unfreeze) designated entities' assets.
- **Activity-Based Financial Prohibitions** involve ensuring that financial institutions are aware of their obligations under WMD UNSCRs and that states are promoting compliance. Measures include applying enhanced scrutiny to customers, transactions, and import-export controls; and adapting or expanding existing financial mechanisms, controls, or prohibitions with respect to items controlled for military or proliferation reasons.

<sup>34</sup> Behnam Taleblu, "Iranian Cruise Missiles also a Proliferation Threat," Foundation for Defense of Democracies, February 22, 2018. (<http://www.defenddemocracy.org/media-hit/behnam-ben-taleblu-iranian-cruise-missiles-also-a-proliferation-threat/>)

<sup>35</sup> "Statement for the Record Worldwide Threat Assessment of the US Intelligence Community Senate Select Committee on Intelligence," Office of the Director of National Intelligence, January 29, 2014. ([http://www.dni.gov/files/documents/Intelligence%20Reports/2014%20WTA%20%20SFR\\_SSCI\\_29\\_Jan.pdf](http://www.dni.gov/files/documents/Intelligence%20Reports/2014%20WTA%20%20SFR_SSCI_29_Jan.pdf))

<sup>36</sup> "2015 Annual Report on the Protection of the Constitution (Facts and Trends)," Germany's Federal Ministry of the Interior, June 2016. (<https://www.verfassungsschutz.de/en/public-relations/publications/annual-reports/annual-report-2015-summary>)

<sup>37</sup> "Brief summary 2016 Report on the Protection of the Constitution," Germany's Federal Ministry of the Interior, 2016. (<https://www.verfassungsschutz.de/embed/annual-report-2016-summary.pdf>)



Finally, there is a practical and political question as to how Iran itself would implement targeted financial sanctions against individuals and entities on the U.N. blacklist, which include parts of its own government. The FATF's guidelines would require Iran to execute an unlikely campaign against organizations subordinate to the Ministry of Defense, as well as against military and IRGC officers, freezing their assets and ensuring that no funds are made available to them.<sup>39</sup>

Iran also would have to demonstrate the ability and the willingness to implement sweeping U.N. sanctions against North Korea. This seems unlikely. According to the U.S. Treasury Department, U.N.-sanctioned entities in Iran and North Korea have shared missile technology and cooperated on the missile development, including "work on an 80-ton rocket booster being developed by the North Korean government."<sup>40</sup>

## Conclusion

The FATF continues to focus its efforts with Iran on addressing the country's AML/CFT deficiencies. However, the proliferation threat from Iran has not disappeared as a result of the nuclear agreement. The immediate threat posed by Iran's nuclear program has been reduced, but quickly could reemerge if the agreement falls apart. Meanwhile, Iran's expansive ballistic missile program, which can serve as a means of delivering nuclear weapons, remains subject to international sanctions and to more stringent national sanctions.

In its ongoing evaluation of the risk posed by Iran to the global financial system, the FATF should not lose sight of proliferation, both the proliferation threat still posed by Iran and the risk that Iran continues to support proliferation in other countries, notably North Korea.

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<sup>38</sup> "2016 Constitutional Protection Report of the State of North Rhine-Westphalia" (in German), Ministry of the Interior of North Rhine-Westphalia, 2016.

([https://www.mik.nrw.de/nc/publikationen/produktauswahl.html?tt\\_products%5Bcat%5D=11](https://www.mik.nrw.de/nc/publikationen/produktauswahl.html?tt_products%5Bcat%5D=11))

<sup>39</sup> Annex B, U.N Security Council resolution 2231 (2015), United Nations, July 20, 2015.

([http://www.un.org/en/ga/search/view\\_doc.asp?symbol=S/RES/2231\(2015\)](http://www.un.org/en/ga/search/view_doc.asp?symbol=S/RES/2231(2015)))

<sup>40</sup> "Treasury Sanctions Those Involved in Ballistic Missile Procurement for Iran," U.S. Department of the Treasury, Press Release, January 17, 2016. (<https://www.treasury.gov/press-center/press-releases/Pages/jl0322.aspx>)

## About the Wisconsin Project

The Wisconsin Project on Nuclear Arms Control is a non-profit, non-partisan organization based in Washington D.C. that conducts research, advocacy, and public education designed to inhibit the spread of nuclear, chemical, and biological weapons and the missiles to deliver them. The organization was founded in 1986 by Gary Milhollin, in cooperation with the University of Wisconsin.

The Wisconsin Project's mission is to reduce the risk that exports will accelerate the proliferation of weapons of mass destruction. The Project helps governments comply with the export restrictions in international agreements, and helps them ensure that their national controls on strategic goods are enforced. The Project also publicizes clandestine transactions in these goods, and draws attention to weaknesses in trade agreements and national laws. Through its research, testimony, and publications, the Project has influenced the export policies of major supplier countries.

## About Iran Watch

Iran Watch is a website published by the Wisconsin Project that monitors Iran's capability for building nuclear weapons and long-range missiles. The purpose of the website is to increase public awareness of the strategic situation in Iran and to make detailed knowledge of Iran's weapon potential available to policymakers, the media, private scholars, and the general public.

Through Iran Watch, the Wisconsin Project provides an objective resource for monitoring and assessing the implementation of the nuclear agreement, or Joint Comprehensive Plan of Action (JCPOA). The site contains thousands of primary source documents related to Iran, as well as reports on Iran's nuclear and missile programs, profiles of the entities involved in or supporting these programs, and analysis of the international effort halt them.