

August 3, 2016

Mr. Dennis Muilenburg  
The Boeing Company  
100 North Riverside  
Chicago, Illinois 60606

Dear Mr. Muilenberg,

We, as current and former national security professionals, write to express our great concern that the Boeing Company, along with its subsidiaries, is continuing to pursue a deal with the Islamic Republic of Iran to provide the country with commercial aircraft, parts, and technicians to modernize its aging aviation industry. This deal represents more than a business venture with an emerging market; it represents a legitimization of a State Sponsor of Terror and a direct benefit for a ruling regime responsible for gross human rights abuses, support for terrorism including threats against the U.S. and its allies, and continued provocations against the international community in regards to its ballistic missile program.

The reported deal with Iran would send more than a hundred planes to the Islamic Republic, while Iran attempts to finance the purchase of these aircraft through its opaque and illicit financial sector. We are aware that Boeing has secured a license from the U.S. Treasury Department's Office of Foreign Asset Control to engage in preliminary discussions with Iran about these sales. However, the prospect of such sales remains fraught with danger for Boeing and the international community. Given Iran's regional destabilizing activity, that danger will be even greater should this deal be finalized. We are also sending a letter to Airbus to express these same concerns.

In order to finance a deal of this magnitude with Iran, Boeing or one of its subsidiaries will have to engage Iran's financial sector in order to receive payment. The banks that finance the deal will have to work with a country that remains a jurisdiction of primary money laundering concern, as designated by the U.S. Treasury. The [2011 designation](#) of Iran and its entire financial sector, including its central bank, was based on "Iran's support for terrorism; pursuit of weapons of mass destruction (WMD); reliance on state-owned or controlled agencies to facilitate WMD proliferation; and the illicit and deceptive financial activities that Iranian financial institutions – including the Central Bank of Iran – and other state-controlled entities engage in to facilitate Iran's illicit conduct and evade sanctions." The Financial Action Task Force (FATF) called out Iran's financial sector as suspect, [stating in June](#), "Until Iran implements the measures required to address the deficiencies identified in the Action Plan, the FATF will remain concerned with the terrorist financing risk emanating from Iran and the threat this poses to the international financial system." These statements represent a joint conclusion by both the U.S. and international community that Iran has yet to significantly reform its financial sector and is still not compliant with international banking standards.

Through the terms of the Joint Comprehensive Plan of Action (JCPOA), many Iranian banks, including the Central Bank of Iran, were de-listed by the U.S. Treasury and the European Union in order to facilitate Iran agreeing to temporarily roll back its nuclear program. Unfortunately, these financial institutions have not changed their behavior and may still be facilitating the illicit financial activities that resulted in their designation in the first place. We also know from recent reports that Iran has attempted to acquire technology relevant to ballistic missiles and [chemical and biological weapons](#). Additionally, UN Secretary General Ban Ki-moon [stated](#) that Iran is acting in ways inconsistent with the spirit of the JCPOA by conducting ballistic missile tests and left open that Iran may be violating UN Security Council resolutions. We are also concerned about reports that Iran may be attempting to [acquire materials](#) outside of the designated procurement channel to clandestinely support its nuclear program and the [seizure](#) of

illegal Iranian weapons shipments intended for Houthi militants in Yemen. These incidents demonstrate that Tehran is engaged in activities contrary to international norms and security.

Lastly, we remain concerned that the aircraft themselves will be used by the Iranian regime to further the activities of its Islamic Revolutionary Guard Corps (IRGC) in support of President Bashar al-Assad's war machine in Syria. The IRGC has flown weapons and soldiers to Syria to defend the Assad regime and provides arms to the Houthi rebels in Yemen. It has also supplied thousands of rockets and arms to Hezbollah in Lebanon, representing a direct threat to the State of Israel. Many of Iran's airlines, including Mahan Air, remain [designated by the U.S. Treasury](#) for these activities. Iran Air, the recipient of the aircraft and parts from this deal, was only recently delisted by the U.S. Treasury as a concession in the JCPOA, and was previously designated for [assisting the IRGC and Iranian Ministry of Defense's weapons shipments](#). Iran Air continues to [fly direct routes from Iran to Syria](#), and some of these flights have originated from known IRGC hubs.

The deal appears to extend beyond any practical need. Iran Air currently only operates around 40 functional aircraft. Iran's stated goal of acquiring some 500 aircraft would vastly overtake its needs and represent a huge pool of aviation technology that could be diverted for illicit purposes. We are concerned that the true intent of Iran Air is likely to lease or resell some of its older aircraft as well as these new aircraft to other designated Iranian airlines. If diverted and used by designated entities, these aircraft would be directly supporting terrorism.

As concerned national security practitioners and professionals, we will continue to advocate limiting resources to Iran that can be utilized to continue and fortify its malign behavior. As Iran continues to violate international law through its support of global terrorism, gross human rights abuses, and aggressive behavior to destabilize the Middle East, we promise to increase pressure on Congress, the administration, and the international community to hold Iran accountable for its actions. We ask that you consider these issues before selling a significant capability to a country which remains a State Sponsor of Terror and a threat to the U.S. and our allies.

Sincerely,

Gen. Michael V. Hayden  
Former Director, Central Intelligence Agency  
and National Security Agency

Sen. Joseph Lieberman  
Former U.S. Senator from Connecticut

Judge Michael Mukasey  
Former Attorney General of the United States

Hon. George P. Shultz  
Former Secretary of State

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