



Washington Tightens the Screws

An Overview of U.S. Statutes and Executive Orders Related to Iran

August 25, 2020

In May 2018, the United States withdrew from the Joint Comprehensive Plan of Action (JCPOA), the nuclear agreement it had reached in 2015 with Iran and six other parties. Thereafter, the U.S. Government has redoubled its efforts to squeeze Iran with sanctions under a “maximum pressure” policy aimed at compelling Tehran to negotiate a new agreement with stricter limits on its nuclear and missile programs, as well as constraints on its regional malign activities and support for terrorism. This policy reversed the sanctions relief provided to Iran as part of the JCPOA. While most U.S. trade and investment with Iran has long been prohibited under the embargo, the U.S. withdrawal from the JCPOA has also made it difficult for foreign entities to do business with Iran without exposing themselves to U.S. secondary sanctions.

In this context, it is worth recalling the breadth and chronology of U.S. laws that restrict trade and investment with Iran and punish proliferation. These restrictions are part of the long-standing U.S. strategy to contain Iran's efforts to build weapons of mass destruction, to limit Iran's support for terrorism, and to punish Iran's human rights abuses.

U.S. restrictions on general trade and investment with Iran were successively tightened via executive orders in 1987, 1995, and 1997, culminating in the near total embargo that exists today. These efforts were supplemented by laws that target proliferation to Iran specifically, such as the Iran-Iraq Nonproliferation Act and the statute passed in 2000, the Iran Nonproliferation Act. In October 2006, the Iran Freedom Support Act (IFSA) amended a 1996 statute to include strong penalties for proliferation to Iran. IFSA also builds on a movement to block Iran from raising funds for proliferation by expanding an anti-terrorism money laundering statute to allow its use against entities involved in proliferation.

Secondary sanctions targeting foreign firms and financial institutions that engage in business with Iran were added between 2010 and 2012. Relevant laws include the 2010 Comprehensive Iran Sanctions, Accountability, and Divestment Act (CISADA), the 2012 Iran Threat Reduction and Syria Human Rights Act (ITRSHRA), and the 2012 Iran Freedom and Counter-Proliferation Act (IFCA). These statutes, and executive orders pursuant to them, imposed far-reaching sanctions on Iran's financial, energy, and shipping sectors, as well as on [the Islamic Revolutionary Guards Corps](#)

[\(IRGC\)](#) and its affiliates. Many, though not all, of these sanctions were lifted in 2016 following implementation of the JCPOA.

When the United States withdrew from the JCPOA, it re-imposed earlier sanctions related to Iran's nuclear program that had been suspended under the agreement, and then set out to add more. The 2017 Countering America's Adversaries through Sanctions Act (CAATSA) expanded secondary sanctions by requiring the President to impose penalties on any entity that "knowingly engages in any activity that materially contributes" to Iran's ballistic missile or weapons of mass destruction programs. In April 2019, the State Department designated the IRGC as a Foreign Terrorist Organization and announced that it would stop issuing sanctions waivers for countries that imported Iranian oil. A series of executive orders since May 2018 has broadened sanctions to encompass several additional sectors of the Iranian economy, such as metals, construction, manufacturing, mining, and textiles. In sum, these U.S. sanctions nearly amount to a global embargo on transactions with Iran; whether they will achieve their intended effect remains to be seen.

Presented below are the U.S. laws and executive orders that establish the sanctions architecture for Iran's proliferation activities, support for terrorism, human rights abuses, and regional malign actions. The list contains only statutes that remain in effect; each entry reflects any amendments made as of August 2020. The parts of new laws that amend previous laws are noted briefly in the amending law, and are reflected in detail in the entry for the amended law.

TIMELINE: HOW WASHINGTON HAS TIGHTENED THE SCREWS

Since 2018: Executive orders signed targeting metals and manufacturing sectors, and the Supreme Leader's office; IRGC designated as a Foreign Terrorist Organization; and waivers allowing import of Iranian oil ended.

From 2013 - 2018: Most nuclear-related sanctions suspended in 2016 pursuant to the JCPOA; an executive order targeting Iranian cyberattacks signed; and secondary sanctions expanded through CAATSA.

2018

EXECUTIVE ORDER 13846

Re-imposes banking, energy, and shipping sanctions waived as a result of U.S. participation in the JCPOA, following U.S. withdrawal.

IRAN FREEDOM AND COUNTER-PROLIFERATION ACT

Targets Iran's shipping, energy, and shipbuilding sectors.

2012

IRAN THREAT REDUCTION AND SYRIA HUMAN RIGHTS ACT

Tightens sanctions on Iran's energy, shipping and financial sectors, as well as on the IRGC.

COMPREHENSIVE IRAN SANCTIONS, ACCOUNTABILITY, AND DIVESTMENT ACT

Tightens restrictions on financial investments related to Iran and on Iran's development of petroleum resources.

2010

From 2001 - 2012: Executive orders signed targeting Iranian financial institutions, proliferation to and from Iran, terrorism, and Iranian entities enabling human rights abuses; Iran designated as a jurisdiction of primary money laundering concern; and Iran Freedom Support Act signed into law.

2000

IRAN, NORTH KOREA, AND SYRIA NONPROLIFERATION ACT

Authorizes sanctions on foreign entities that knowingly traffic in items that contribute to the development of WMD or missiles to or from Iran (as of 2000), Syria (as of 2005), and North Korea (as of 2006).

From 1996 - 2000, trade and investment prohibitions for U.S. parties were consolidated and clarified.

1996

IRAN SANCTIONS ACT

Aimed at preventing Iran from using petroleum resources to fund its WMD programs and to support terrorism by sanctioning non-U.S. entities that knowingly invest in Iran's energy sector; subsequently amended and extended.

From 1993 - 1996: Several measures passed aimed at preventing WMD proliferation through sanctions on foreign entities pursuing nuclear and other WMD programs, or contributing to such programs through exports.

1992

IRAN-IRAQ NONPROLIFERATION ACT

Authorizes the President to sanction persons or countries that contribute to efforts by Iran or Iraq to acquire WMD and advanced conventional weapons.

Since the national emergency declared in response to the 1979 hostage crisis, the U.S. has sought to block property interests linked to the government of Iran; the emergency has been renewed annually since that time.



2020: Executive Order 13902¹

Targets the construction, mining, manufacturing, and textiles sectors of the Iranian economy. Freezes assets in the United States, or held by a U.S. person, of any entity operating in or conducting "significant" transactions with those sectors, as well as persons who materially support or act on behalf of such entities. Restrict access to the U.S. financial system of any foreign financial institution that "knowingly" facilitates "significant" transactions in those sectors or for entities involved in them. Also blocks sanctioned persons from entering the United States and prohibits U.S. persons from making donations to them. Delegates to the Secretary of the Treasury the authority to expand those sanctions to any other sector of the Iranian economy.

2019: Executive Order 13876²

Targets Iran's Supreme Leader, his office, and Iranian government officials located inside or outside of Iran who have been appointed directly or indirectly by the Supreme Leader. Freezes assets in the United States (or held by a U.S. person) of those entities and any entity that materially supports them or acts on their behalf, including executives and board members of blocked parties. Restricts access to the U.S. financial system of any foreign financial institution that "knowingly" conducts "significant" transactions for the sanctioned persons. Also blocks sanctioned persons from entering the United States and prohibits U.S. persons from making donations to them. Entities designated under this act include Iran's Foreign Minister, for acting on behalf of the Supreme Leader.

2019: Executive Order 13871³

Targets the steel, iron, copper, and aluminum sectors of the Iranian economy. Freezes assets in the United States (or held by a U.S. person) of any entity operating in or "knowingly" conducting "significant" transactions with those sectors, as well as persons who act on behalf of or materially

¹ "Executive Order 13902: Imposing Sanctions with Respect to Additional Sectors of Iran," *The Federal Register*, Vol. 85, No. 9, January 14, 2020, available at <https://www.govinfo.gov/content/pkg/FR-2020-01-14/pdf/2020-00534.pdf>, accessed on August 25, 2020.

² "Executive Order 13876: Imposing Sanctions with Respect to Iran," *The Federal Register*, Vol. 84, No. 123, June 26, 2019, available at <https://www.govinfo.gov/content/pkg/FR-2019-06-26/pdf/2019-13793.pdf>, accessed on August 25, 2020.

³ "Executive Order 13871: Imposing Sanctions with Respect to the Iron, Steel, Aluminum, and Copper Sectors of Iran," *The Federal Register*, Vol. 84, No. 91, May 10, 2019, available at <https://www.govinfo.gov/content/pkg/FR-2019-05-10/pdf/2019-09877.pdf>, accessed on August 25, 2020.

support such entities (including by providing marketing, transportation, or technological support). Restricts access to the U.S. financial system of any foreign financial institution involved or facilitating transactions in those sectors. Also blocks sanctioned individuals from entering the United States and prohibits U.S. persons from making donations to them.

2019: Significant Reduction Exceptions for oil imports terminated⁴

Ends exemptions from U.S. sanctions on the import of Iranian oil for financial institutions in countries that had significantly reduced, but not eliminated, their petroleum purchases from Iran (pursuant to the FY2012 NDAA). Exposes all entities that import oil from Iran, regardless of their home country, to U.S. secondary sanctions.

2019: IRGC designated as a Foreign Terrorist Organization (FTO)⁵

Finds that the IRGC is a foreign organization that engages in terrorist activity that threatens U.S. national security, pursuant to section 219 of the Immigration and Nationality Act. Blocks members of the IRGC from entering the United States and, under certain circumstances, makes them eligible for deportation from the United States. Prohibits persons under U.S. jurisdiction from providing material support or resources to the IRGC. Freezes assets in the United States (or held by a U.S. person) of the IRGC or its agents and requires U.S. financial institutions to report assets in their possession in which the IRGC has an interest to the U.S. Department of the Treasury. Is the first FTO designation targeting a part of a foreign government.

The IRGC had previously been designated pursuant to E.O. 13224 (in 2017), E.O. 13606 (in 2012), E.O. 13553 (in 2011), and E.O. 13382 in 2007, which impose many of the same restrictions.

2018: Executive Order 13846⁶

Re-imposes sanctions that were waived as a result of U.S. participation in the JCPOA. Specifically:

- Freezes assets held in the United States by persons assisting the Government of Iran in obtaining U.S. dollars or precious metals; persons materially supporting [the National](#)

⁴ “Decision on Imports of Iranian Oil,” U.S. Department of State, April 22, 2019, available at <https://www.state.gov/decision-on-imports-of-iranian-oil/>, accessed on August 25, 2020.

⁵ “In the Matter of the Designation of the Islamic Revolutionary Guard Corps (and Other Aliases) as a Foreign Terrorist Organization,” U.S. Department of State, April 8, 2019, available at <https://www.govinfo.gov/content/pkg/FR-2019-04-15/pdf/2019-07415.pdf>, accessed on August 25, 2020.

⁶ “Executive Order 13846: Reimposing Certain Sanctions With Respect to Iran,” *The Federal Register*, Vol. 83, No. 152, August 7, 2018, available at <https://www.govinfo.gov/content/pkg/FR-2018-08-07/pdf/2018-17068.pdf>, accessed on August 25, 2020.

Iranian Oil Company (NIOC), Naftiran Intertrade Company (NICO), or the Central Bank of Iran; persons materially assisting Iranians on the Specially Designated Nationals List (SDN); and any persons operating in or supporting the energy, shipping, or shipbuilding sectors of the Iranian economy.

- Restricts access to the U.S. financial system by any foreign financial institution that "knowingly" supports "significant" transactions in connection with Iran's automotive sector, on behalf of any Iranian on the SDN List, with NIOC or NICO, or facilitating Iran's trade in oil, petroleum products, and petrochemicals.
- Authorizes additional sanctions on persons conducting transactions with Iran's automotive, oil, and petrochemicals sectors.
- Restricts access to the U.S. financial system and freezes assets held in the United States by foreign financial institutions that trade in or hold accounts in the Iranian rial.
- Freezes assets held in the United States by persons involved in censorship in Iran or the diversion of humanitarian aid to Iran, or who provide goods, services, or technologies likely to be used to commit human rights abuses in Iran.
- Bars foreign subsidiaries of U.S. companies from "knowingly" engaging in transactions with Iran that are prohibited for U.S. persons or entities located in the United States.
- Authorizes penalties against U.S. companies for sanctions violations by their foreign subsidiaries.
- Blocks sanctioned persons from entering the United States and prohibits U.S. persons from making donations to them.

Contains an exception allowing foreign financial institutions to facilitate their country's trade in natural gas with Iran, and also contains a provision allowing the President to relax oil sanctions if there is not a sufficient oil supply from countries other than Iran. Revokes Executive Orders 13716 and 13628.

2017: Countering America’s Adversaries through Sanctions Act (CAATSA)⁷

Expands secondary sanctions connected with Iran. Specifically:

- Requires the President to freeze assets in the United States, or held by a U.S. person, of persons who “knowingly engages in any activity that materially contributes” to Iran’s ballistic missile or weapons of mass destruction programs, and also to block those persons from entering the United States.
- Mandates that the President impose sanctions pursuant to Executive Order 13224 on IRGC members and their affiliates.
- Authorizes the President to freeze assets held in the United States by persons who have committed human rights abuses in Iran.
- Mandates that the President freeze assets and deny entry into the United States of persons who supply Iran with conventional weapons listed in the U.N. Register of Conventional Arms or who provide training or maintenance related to those weapons.
- Requires the President to provide Congress an explanation for all instances in which an Iranian person is sanctioned for proliferation, support for terrorism, or human rights abuses by the European Union but not the United States, and vice versa.

The Act allows exceptions to mandatory sanctions for U.S. national security, for compliance with U.S. agreements with the United Nations, and for humanitarian assistance to Iran. It authorizes the President to waive sanctions for renewable periods of 180 days.

2015: Executive Order 13694⁸

Freezes assets in the United States, or held by a U.S. person, of entities that have engaged in cyberattacks that harm the United States. Also blocks the entry of such persons into the United States and prohibits U.S. persons from making donations to them.

⁷ “Countering America’s Adversaries through Sanctions Act,” U.S. Congress, August 2, 2017, available at <https://www.congress.gov/115/plaws/publ44/PLAW-115publ44.pdf>, accessed on August 25, 2020.

⁸ “Executive Order 13694: Blocking the Property of Certain Persons Engaging in Significant Malicious Cyber-Enabled Activities,” *The Federal Register*, Vol. 80, No. 63, April 2, 2015, available at <https://www.govinfo.gov/content/pkg/FR-2015-04-02/pdf/2015-07788.pdf>, accessed on August 25, 2020.

2012: Iran Freedom and Counter-Proliferation Act (IFCA) (Title XII, Subtitle D of the National Defense Authorization Act for Fiscal Year 2013)⁹

Targets Iran's shipping, energy, and shipbuilding sectors. Specifically:

- Designates all entities operating in those sectors as entities of proliferation concern.
- Requires the President to freeze assets held in the United States by those entities, including entities that operate ports in Iran or that provide material support to the designated sectors.
- Requires the President to impose five or more penalties from the Iran Sanctions Act (ISA) of 1996 on entities that: knowingly provide goods or services to Iran via the energy, shipbuilding, or shipping sectors (i.e., by transporting goods on an Iranian vessel); trade with Iran in precious metals and other materials, including graphite, "raw or semi-finished metals," coal, and industrial integration software, or any material that is used in sectors of Iran's economy controlled by the IRGC, sold by an Iranian entity on the SDN List, or relevant to Iran's nuclear, military, or missile programs; or provide insurance for sanctionable activity or sanctioned entities.
- Restricts access to the U.S. financial system of foreign financial institutions that conduct transactions for sanctioned activities or on behalf of sanctioned entities.
- Requires the President to add Islamic Republic of Iran Broadcasting (IRIB) and its president, Ezzatollah Zargami, to the SDN List.

The Act contains an exception for food, medicine, and humanitarian assistance and allows the President to waive sanctions for periods of up to 180 days. It authorizes the President to make an exception for activities related to the reconstruction or development of Afghanistan and to the global oil supply.

⁹ "National Defense Authorization Act for Fiscal Year 2013," U.S. Congress, January 2, 2013, available at <https://www.congress.gov/112/plaws/publ239/PLAW-112publ239.pdf>, accessed on August 25, 2020.

2012: Iran Threat Reduction and Syria Human Rights Act (ITRSHRA)¹⁰

Tightens sanctions on Iran's energy, shipping and financial sectors, as well as on the IRGC, including through amendments to the ISA and CISADA. Specifically:

- Requires additional sanctions on Iran's energy sector, including against joint ventures for the development of petroleum resources, the provision of goods, services, or technical support that allow Iran to develop those resources or increase the domestic production of refined petroleum products, among other restrictions.
- Requires the President to freeze assets held in the United States by persons who provide or insure a vessel that contributes to Iran's proliferation of weapons of mass destruction or support for terrorism.
- Requires the President to impose five or more penalties pursuant to the ISA on persons who provide insurance or reinsurance services to NIOC or the National Iranian Tanker Company (NITC), and on persons who purchase or facilitate the issue of Iranian government debt.
- Prohibits foreign subsidiaries of U.S. entities from knowingly engaging in sanctionable activity related to Iran, and holds the parent company liable for such activity.
- Requires companies to disclose past activities with sanctioned Iranian sectors or entities to the Securities and Exchange Commission (SEC).
- Authorizes the President to impose sanctions on any person providing financial messaging services to the Central Bank of Iran or other financial institutions pursuant to the CISADA.
- Blocks senior Iranian government officials involved in Iran's proliferation activities, support for terrorism, or human rights abuses and their family members from entering the United States unless to attend the United Nations or if the President issues a waiver.
- Amends the CISADA to require the President to impose sanctions on persons who have transferred or provided services related to goods or technologies that "are likely to be used" by the Iranian government to commit human rights abuses.

¹⁰ "Iran Threat Reduction and Syria Human Rights Act of 2012," [U.S. Congress, August 10, 2012, available at https://www.congress.gov/112/plaws/publ158/PLAW-112publ158.pdf](https://www.congress.gov/112/plaws/publ158/PLAW-112publ158.pdf), accessed on August 25, 2020.

- Requires the President to freeze assets in the United States (or held by a U.S. person) of all “officials, agents, or affiliates” of the IRGC, and to block those persons from entering the United States.
- Requires the President to impose five or more ISA penalties on persons who conduct transactions with or materially assist the IRGC.
- Authorizes the President to deny foreign aid, exports licenses, loans, or arms sales to a foreign government agency that materially supports the IRGC.
- Blocks Iranian citizens from entering the United States to pursue an education related to the energy sector or nuclear science and engineering.
- Allows frozen Iranian assets to be awarded as damages in lawsuits against Iran.

The Act contains a general exception for activity related to natural gas development and pipeline projects meant to supply natural gas to Turkey and Europe, as well as specific exceptions in several cases for the provision of food, medicine, and humanitarian assistance. It allows the President to waive sanctions in most cases for national security reasons. The Act also commits the United States to offer refugee status or asylum to Iranian political dissidents.

2012: Executive Order 13608¹¹

Authorizes sanctions on foreign entities determined to be complicit in violating or attempting to violate U.S. sanctions against Iran or Syria, or to have facilitated transactions on behalf of entities subject to U.S. sanctions concerning Iran or Syria. The Order prohibits transactions involving the sanctioned entity and bars their access to the U.S. commercial and financial systems. It also blocks sanctioned individuals from entering the United States.

¹¹ “Executive Order 13608: Prohibiting Certain Transactions with and Suspending Entry into the United States of Foreign Sanctions Evaders with Respect to Iran and Syria,” *The Federal Register*, Vol. 77, No. 86, May 3, 2012, available at <https://www.govinfo.gov/content/pkg/FR-2012-05-03/pdf/2012-10884.pdf>, accessed on August 25, 2020.

2012: Executive Order 13606¹²

Targets entities determined to be involved in or to have enabled "serious human rights abuses" by or on behalf of the Iranian or Syrian governments via information technology, including through the sale or provision of items "likely to be used to facilitate computer or networking disruption, monitoring, or tracking." The Order authorizes a freeze on all assets in the United States of designated entities, as well as on their assets controlled by U.S. persons, including foreign branches of U.S. companies. The Order also blocks sanctioned individuals from entering the United States. Pursuant to the Order, sanctions were imposed on Iran's Ministry of Intelligence and Security, the IRGC, Iran's Law Enforcement Forces, and Datak Telecom.

2012: Executive Order 13599¹³

Targets Iran's financial sector. Freezes assets in the United States (or by a U.S. person) of the Iranian government, the Central Bank of Iran, and any Iranian financial institution (including foreign branches), whether directly or through intermediaries. Prohibits U.S. persons from making donations to those entities.

2011: Identification of Iran as a "jurisdiction of primary money laundering concern" under Section 311 of the USA Patriot Act¹⁴

Requires U.S. financial institutions to perform enhanced due diligence measures in order to avoid transactions with Iranian financial institutions.

¹² "Executive Order 13606: Blocking the Property and Suspending Entry into the United States of Certain Persons with Respect to Grave Human Rights Abuses by the Governments of Iran and Syria via Information Technology," *The Federal Register*, Vol. 77, No. 79, April 24, 2012, available at <https://www.govinfo.gov/content/pkg/FR-2012-04-24/pdf/2012-10034.pdf>, accessed on August 25, 2020.

¹³ "Executive Order 13599: Blocking Property of the Government of Iran and Iranian Financial Institutions," *The Federal Register*, Vol. 77, No. 26, February 8, 2012, available at <https://www.govinfo.gov/content/pkg/FR-2012-02-08/pdf/2012-3097.pdf>, accessed on August 25, 2020.

¹⁴ "Finding That the Islamic Republic of Iran Is a Jurisdiction of Primary Money Laundering Concern," U.S. Department of the Treasury, November 8, 2011, available at <https://www.govinfo.gov/content/pkg/FR-2011-11-25/pdf/2011-30332.pdf>, accessed on August 25, 2020.

2011: National Defense Authorization Act for Fiscal Year 2012 (NDAA)¹⁵

Targets Iran's financial sector. Specifically:

- Designates the financial sector of Iran, including the Central Bank of Iran, as a primary money laundering concern, and freezes the assets in the United States of Iranian financial institutions.
- Prohibits foreign financial institutions (including government-owned banks) from opening or in most cases maintaining in the United States a correspondent or payable-through account if the financial institution is determined to have "knowingly" conducted any "significant" transaction with Iran's central bank or any other U.S.-sanctioned Iranian financial institution.

The law includes a 60 day reporting requirement on the availability and price of petroleum and petroleum products. Financial transactions related to the sale or purchase of petroleum may be exempt if a determination is made that there is insufficient supply from countries other than Iran, or if a country with primary jurisdiction over the foreign financial institution in question has significantly reduced its volume of petroleum purchases from Iran, or if that country faces exceptional circumstances that prevent it from significantly reducing its volume of petroleum purchases from Iran. The President may also waive sanctions for national security reasons in renewable increments of 120 days, after submitting a report to Congress that details the justification and concrete cooperation received or expected as a result of the waiver.

Executive Order 13599 implements section 1245(c) of the NDAA by blocking all Iranian government property, as well as the property of any Iranian financial institution, including Iran's central bank, that is in the United States or within control of U.S. persons. U.S. financial institutions are required to freeze such transactions whereas previous measures only required rejecting them. The Order also delegates certain authorities to the Secretaries of the Treasury and State for implementing sanctions against foreign financial institutions that engage in "significant" financial transactions with any U.S.-sanctioned Iranian financial institution. Amended by the Iran Freedom and Counter-Proliferation Act (IFCA) contained in the FY2013 NDAA.

¹⁵ "National Defense Authorization Act for Fiscal Year 2012," U.S. Congress, December 31, 2011, available at <https://www.congress.gov/112/plaws/publ81/PLAW-112publ81.pdf>, accessed on August 25, 2020.

2011: Executive Order 13572¹⁶

Freezes assets in the United States (or held by a U.S. person) of entities complicit in or responsible for human rights abuses in Syria and their senior officials. Prohibits U.S. persons from conducting transactions with or making donations to sanctioned persons. Also blocks the property of persons that have materially assisted such abuses or acted on behalf of sanctioned entities. [The IRGC Quds Force](#) is specifically designated in the annex to the order.

2010: Executive Order 13553¹⁷

Blocks the property and interests in property in the United States of Iranian government officials and other persons acting on behalf of the Government of Iran determined to be responsible for or complicit in "serious" human rights abuses. Also blocks the property of persons that have materially assisted in or provided support for such abuses.

2010: Comprehensive Iran Sanctions, Accountability, and Divestment Act (CISADA)¹⁸

Tightens restrictions on financial investments related to Iran and on Iran's development of petroleum resources, including through amendments to the ISA. Specifically:

Requires sanctions on persons that knowingly invest in or support the development of petroleum resources in Iran, export refined petroleum products to Iran, or enhance Iran's ability to produce or import such products.

- Requires all prospective contractors for the U.S. government to certify that they are not involved in any sanctionable activities and prohibits heads of executive agencies from procuring goods or services from entities that export telecommunication and similar sensitive technology to Iran.

¹⁶ "Executive Order 13572: Blocking Property of Certain Persons With Respect to Human Rights Abuses in Syria," *The Federal Register*, Vol. 76, No. 85, May 3, 2011, available at <https://www.govinfo.gov/content/pkg/FR-2011-05-03/pdf/2011-10910.pdf>, accessed on August 25, 2020.

¹⁷ "Executive Order 13553: Blocking Property of Certain Persons with Respect to Serious Human Rights Abuses by the Government of Iran and Taking Certain Other Actions," *The Federal Register*, Vol. 75, No. 190, October 1, 2010, available at <https://www.govinfo.gov/content/pkg/FR-2010-10-01/pdf/2010-24839.pdf>, accessed on August 25, 2020.

¹⁸ "Comprehensive Iran Sanctions, Accountability, and Divestment Act of 2010," U.S. Congress, July 1, 2010, available at <https://www.congress.gov/111/plaws/publ195/PLAW-111publ195.pdf>, accessed on August 25, 2020.

- Further restricts U.S. imports from and exports to Iran, with limited exceptions.
- Prohibits foreign financial institutions from maintaining accounts in the United States if these institutions knowingly facilitate the Iranian government's effort to develop weapons of mass destruction or support designated terrorist organizations, or if these institutions facilitate "significant transactions" for the IRGC.
- Bars any entity owned or controlled by a domestic financial institution from dealing with the IRGC.
- Establishes criteria for U.S. states to prohibit the investment of public funds in entities that invest in Iran's energy sector.
- Requires the President to submit bi-annual reports on investments in Iran's energy sector to Congress as well as reports on the sanctionable activities of foreign export credit agencies and financing of those agencies by the Export-Import Bank of the United States.
- Requires the President to designate a country as a Destination of Diversion Concern if the country allows substantial diversion of U.S.-origin items, or of any sensitive good, service, or technology, to an Iranian end-user or intermediary.
- Creates a license requirement for U.S. exports to such designated countries, though this requirement can be waived annually for countries taking steps to end diversion to Iran.
- Requires the President to report to Congress the national security interests served by any waivers of sanctions or licensing requirements.
- Requires the President to sanction persons complicit in serious human rights abuses against citizens of Iran after the Iranian election in June 2009; persons who provided goods, services, or technologies used to commit human rights abuses in Iran; persons who engaged in censorship in Iran; and persons who have diverted humanitarian goods intended for the people of Iran. Assets held in the United States by those persons are frozen; U.S. persons are prohibited from conducting transactions with those persons; and those persons are denied entry into the United States.

Executive Order 13574, signed on May 23, 2011, provides enforcement authority for the implementation of the five sanctions regulating private conduct set forth in the Iran Sanctions Act, as amended by CISADA, including: prohibitions on the extension of credit or loans by any U.S. financial institution, foreign exchange transactions, banking transactions, property transactions in the United States, and restrictions or prohibitions on imports of goods, technology, or services

into the United States. Amended by the 2012 Iran Freedom and Counter-Proliferation Act (FY2013 NDAA) and by the 2012 Iran Threat Reduction and Syria Human Rights Act (ITRSHRA).

2006: Iran Freedom Support Act¹⁹

Renames the Iran and Libya Sanctions Act of 1996 as the Iran Sanctions Act of 1996, and extends it until 2011. Codifies restrictions on U.S. trade and investment in Iran imposed through Executive Orders 12957, 12959 and 13059. Amends an anti-terrorism money laundering statute to allow its use against entities involved in the proliferation of weapons of mass destruction.

2005: Executive Order 13382²⁰

Blocks the assets of entities that engaged in or attempted to engage in activities that made a material contribution, or that posed a risk of materially contributing to the proliferation of mass destruction weapons and their means of delivery. Also blocks the assets of agents and subsidiaries and those who aid such entities, and prohibits U.S. persons from dealing with them. Iranian entities originally designated include [Aerospace Industries Organization \(AIO\)](#), [Shahid Hemmat Industrial Group \(SHIG\)](#), [Shahid Bagheri Industrial Group \(SBIG\)](#), and [the Atomic Energy Organization of Iran \(AEOI\)](#).

2001: Executive Order 13224²¹

Freezes assets in the United States, or held by a U.S. person, of foreign persons who are designated as terrorists by the Secretary of State, who are leaders of designated terrorist organizations, who have participated in training provided by designated terrorist entities, or who have materially supported or acted on behalf of such entities. Prohibits U.S. persons from conducting transactions with or donating to sanctioned entities.

Amended in 2019 by [Executive Order 13886](#).

¹⁹ "Iran Freedom Support Act," U.S. Congress, September 30, 2006, available at <https://www.congress.gov/109/plaws/publ293/PLAW-109publ293.pdf>, accessed on August 25, 2020.

²⁰ "Executive Order 13382: Blocking Property of Weapons of Mass Destruction Proliferators and Their Supporters," *The Federal Register*, Vol. 70, No. 126, July 1, 2005, available at <https://www.govinfo.gov/content/pkg/FR-2005-07-01/pdf/05-13214.pdf>, accessed on August 25, 2020.

²¹ "Executive Order 13224: Blocking Property and Prohibiting Transactions with Persons Who Commit, Threaten To Commit, or Support Terrorism," *The Federal Register*, Vol. 66, No. 186, September 25, 2001, available at <https://www.govinfo.gov/content/pkg/FR-2001-09-25/pdf/01-24205.pdf>, accessed on August 25, 2020.

2000 et seq.: Iran, North Korea, and Syria Nonproliferation Act (INKSNA)²²

Authorizes sanctions on foreign entities that knowingly traffic to or from Iran, North Korea or Syria in goods, services, or technology that materially contributes to those countries' development of nuclear, biological, or chemical weapons, or ballistic or cruise missiles. Sanctions include a ban on U.S. government assistance, on the sale of U.S. Munitions List items, and on U.S. government procurement, the denial of U.S. dual-use exports that require a license and the suspension of all such existing licenses. Sanctions on an entity are also applicable to any successor, subsidiary or subunit entity.

This Act was first passed as the Iran Nonproliferation Act of 2000, and included a prohibition on "extraordinary payments" to Russia associated with the International Space Station unless Russia demonstrated "a sustained commitment to seek out and prevent the transfer" of weapons of mass destruction related goods, services or technology to Iran. The Act's application was extended to Syria through the Iran Nonproliferation Amendments Act of 2005, which also authorized penalties against proliferators from the countries identified in the statute, loosened requirements to allow for U.S. payments to the Russian space agency and broadened the Act's penalties to also apply to foreign governments. The Act was broadened to include North Korea in 2006.

1997: Executive Order 13059²³

Consolidates and clarifies Executive Orders 12957 and 12959 to confirm that virtually all (with exceptions for some existing licenses) trade and investment activities with Iran by U.S. entities, wherever located, are prohibited. This includes indirect sales, sales through third countries and re-exports to Iran. These restrictions on U.S. trade with Iran are administered by the Treasury Department through the Iranian Transaction Regulations.

E.O. 12957, published in early 1995, barred U.S. companies from developing petroleum resources in Iran. The Order declared a national emergency with respect to Iran pursuant to the International Emergency Economic Powers Act; the emergency has been renewed annually since then. Shortly thereafter, E.O. 12959 barred virtually all U.S. trade with and investment in Iran, as

²² "Iran Nonproliferation Act of 2000," U.S. Congress, March 14, 2000, available at <https://www.congress.gov/106/plaws/publ178/PLAW-106publ178.pdf>, accessed on August 25, 2020.

²³ "Executive Order 13059: Prohibiting Certain Transactions with Respect to Iran," *The Federal Register*, Vol. 62, No. 162, August 21, 1997, available at <https://www.govinfo.gov/content/pkg/FR-1997-08-21/pdf/97-22482.pdf>, accessed on August 25, 2020.

well as the reexport of U.S. goods to Iran through third nations. Restrictions in these Executive Orders, along with E.O. 13059, were also codified by the Iran Freedom Support Act in 2006.

1996: Iran Sanctions Act²⁴

Aimed at preventing Iran from using petroleum resources to fund its weapons of mass destruction programs and to support terrorism. Specifically:

- Authorizes sanctions on entities that knowingly: invest over \$20 million a year in the development of Iran's petroleum resources, including the construction or repair of related infrastructure (such as roads, ports, and railways); provide goods, services, technology, information, or support valued at or above \$1 million (or with an aggregate value of \$5 million or more within one year), which allow Iran to maintain or expand its production of refined petroleum or petrochemical products; export or barter to Iran refined petroleum products valued at or above \$1 million (or with an aggregate value of \$5 million or more within one year), or whose support enhances Iran's ability to import refined petroleum products (including insurance and shipping companies); enter into joint ventures outside Iran that could result in Iran obtaining petroleum-refining technology; transport Iranian oil to another country (including by insuring a vessel carrying Iranian oil); conceal the origin of Iranian oil exports.
- Authorizes sanctions on entities that knowingly make a material contribution to Iran's ability to acquire or develop mass destruction weapons or destabilizing amounts or types of conventional weapons, including by exporting or facilitating transshipment of related goods, services, or technologies or by entering into joint ventures with Iranian entities that result in the transfer of uranium to Iran or in Iran acquiring technology useful for developing nuclear weapons.

Barring certain exceptions, the President is required to impose at least five out of nine possible penalties on the sanctioned entity. Penalties include the denial of any exports from the United States that require U.S. government review or an export license, a ban on U.S. government procurement, limits on loan assistance, transfers of credit, or payments from U.S. financial institutions, a prohibition on transactions in foreign exchange or relating to property subject to U.S. jurisdiction, restrictions on imports to the United States, a ban on U.S. persons from investing in or purchasing debt or equity from a sanctioned entity, blocking corporate officers of a

²⁴ "Iran and Libya Sanctions Act of 1996," U.S. Congress, August 5, 1996, available at <https://www.congress.gov/104/plaws/publ172/PLAW-104publ172.pdf>, accessed on August 25, 2020.

sanctioned entity from entering the United States, and imposing any of the other penalties on principal executive officers of the sanctioned entity.

The Act also prohibits (with exceptions) transfers of nuclear technology to countries with governments that have primary jurisdiction over a person or company sanctioned for nuclear weapon-related transfers to Iran. It also requires all prospective contractors for the U.S. government to certify that they are not involved in any sanctionable activities, in particular that they have not knowingly engaged in any transactions with the IRGC or its affiliates. It allows the President to waive sanctions for renewable periods of up to one year each.

This Act was first passed in 1996 as the Iran and Libya Sanctions Act (ILSA) and was amended and extended in 2001. In 2006, the Act was extended until December 31, 2011, and was amended, among other things, to remove its application to Libya and to apply proliferation-related sanctions to Iran. In 2010, the Act was extended until December 31, 2016 and amended by the Comprehensive Iran Sanctions, Accountability, and Divestment Act (CISADA) to create additional penalties and to inhibit Iran's ability to produce or import refined petroleum products. The Act was further amended in 2012 by the Iran Threat Reduction and Syria Human Rights Act (ITRSHRA). In 2016, the Act was extended again until December 31, 2026.

1994 et seq.: Executive Order 12938

Consolidates and supersedes previous Executive Orders regarding proliferation. Gives the Secretaries of State and Commerce the power to control exports that help countries "develop, produce, stockpile, deliver, or use" mass destruction weapons and their means of delivery, and authorizes penalties against foreign entities for mass destruction weapon and missile proliferation. Penalized foreign persons are barred from selling their goods in the United States and to the U.S. government, and from receiving U.S. assistance. Foreign countries that acquire or use chemical or biological weapons are barred from receiving U.S. assistance and U.S. defense and national security-sensitive goods, and are restricted from receiving U.S. exports and from selling their goods in the United States.

E.O. 12938 superseded and revoked the 1990 Executive Order 12735, which declared the proliferation of chemical and biological weapons a national emergency. That Order provided the authority to sanction foreign persons for contributing to chemical and biological weapons proliferation and foreign countries that have used, prepared to use, or developed such weapon. E.O. 12938 was itself amended and expanded in 1998 by E.O. 13094, which clarified that foreign entities would be penalized for proliferation of all mass destruction weapons or missiles, and added a ban on U.S. government assistance to such entities.

1994: Nuclear Proliferation Prevention Act²⁵

Prohibits U.S. government procurement from entities found to have materially contributed (through exports) to the efforts of another entity or non-nuclear weapon state to acquire a nuclear weapon or unsafeguarded special nuclear material. Sanctions are also applicable to any successor entity, as well as parents, subsidiaries or affiliates knowingly assisting in the proliferation activities.

1994 et seq.: Nuclear proliferation sanctions of the Arms Export Control Act²⁶

Prohibits economic assistance to countries which provide or receive nuclear enrichment goods or technology outside multilateral auspices; to countries which provide or receive nuclear reprocessing goods or technology; and to non-nuclear weapon states that receive illegal U.S. exports intended to make a material contribution to building a nuclear weapon. Also bans U.S. financial assistance, and military and dual-use exports, to countries knowingly involved in helping a non-nuclear weapon state make or use a nuclear weapon.

1992: Iran-Iraq Nonproliferation Act²⁷

Authorizes the President to sanction persons or countries that knowingly and materially contribute to efforts by Iran or Iraq to acquire weapons of mass destruction and advanced conventional weapons. Mandatory sanctions against persons include a ban on U.S. government contracts and on buying or selling goods that require a U.S. export license. Foreign countries are barred from receiving U.S. government assistance, from purchasing items on the U.S. Munitions List, and are suspended from military and dual-use technical cooperation agreements with the United States. Also prohibits military and commercial arms sales and exports of controlled dual-use and nuclear goods to Iran. Sanctions are also applicable to any successor, parent or subsidiary.

²⁵ “Foreign Relations Authorization Act, Fiscal Years 1994 and 1995,” U.S. Congress, January 25, 1994, available at <https://www.congress.gov/103/bills/hr2333/BILLS-103hr2333enr.pdf>, accessed on August 25, 2020.

²⁶ “International Security Assistance and Arms Exports Control Act,” U.S. Congress, November 13, 1975, available at <https://www.congress.gov/bill/94th-congress/senate-bill/2662>, accessed on August 25, 2020; “Foreign Relations Authorization Act, Fiscal Years 1994 and 1995,” U.S. Congress, January 25, 1994, available at <https://www.congress.gov/103/bills/hr2333/BILLS-103hr2333enr.pdf>, accessed on August 25, 2020.

²⁷ “National Defense Authorization Act for Fiscal Year 1993,” U.S. Congress, August 5, 1996, available at <https://www.congress.gov/bill/102nd-congress/house-bill/5006>, accessed on August 25, 2020.

1991: Chemical or biological weapons proliferation sanctions of the Arms Export Control Act²⁸

Authorizes sanctions against foreign persons who knowingly and materially contribute to the use, development, production, acquisition or stockpiling of chemical or biological weapons by certain countries or entities. Sanctions must be applied for at least one year and include a ban on contracts with the U.S. government and a prohibition on imports to the United States. Sanctions are also applicable to any successor or affiliate, as well parents who knowingly assist in the proliferation activities.

1990 et seq.: Missile proliferation sanctions of the Arms Export Control Act²⁹

Authorizes sanctions against foreign entities (or U.S. entities acting illegally) and any successor entities that knowingly transfer, conspire or attempt to transfer, or facilitate the transfer of missile technology to countries that are not members of the Missile Technology Control Regime (MTCR). Sanctions for MTCR category I transfers include a ban on U.S. government contracts and on purchases of U.S. Munitions List items for at least two years. Sanctions for MTCR category II transfers include a two year ban on U.S. government contracts relating to missiles and a ban on purchases of missile-related technology. A sanctioned foreign entity may also be barred from selling its goods in the United States for at least two years, if its activities "substantially contributed" to missile development in a non-MTCR country.

1987: Executive Order 12613

Bans imports of Iranian goods and services, because of Iran's support for terrorism and its military action against neutral shipping in the Persian Gulf. The import ban and other restrictions on U.S.

²⁸ "International Security Assistance and Arms Exports Control Act," U.S. Congress, November 13, 1975, available at <https://www.congress.gov/bill/94th-congress/senate-bill/2662>, accessed on August 25, 2020; "Chemical and Biological Weapons Control and Warfare Elimination Act of 1991," U.S. Congress, December 4, 1991, available at <https://www.congress.gov/bill/102nd-congress/house-bill/1724>, accessed on August 25, 2020.

²⁹ "International Security Assistance and Arms Exports Control Act," U.S. Congress, November 13, 1975, available at <https://www.congress.gov/bill/94th-congress/senate-bill/2662>, accessed on August 25, 2020; "National Defense Authorization Act for Fiscal Year 1991," U.S. Congress, November 5, 1990, available at <https://www.congress.gov/bill/101st-congress/house-bill/4739>, accessed on August 25, 2020.

trade with Iran are administered by the Treasury Department through the Iranian Transaction Regulations.

1984: Iran designated as a state sponsor of terrorism

Countries so designated by the Secretary of State are subject to restrictions on U.S. foreign assistance, to a ban on U.S. defense exports and sales, to controls over U.S. exports of dual use items, and to various financial and other restrictions. The State Sponsors of Terrorism list includes Iran, North Korea, Sudan and Syria as of August 2020.³⁰

1981: Algiers Accords³¹

Trade restrictions were relaxed with the signing of an agreement to release the hostages and to create an Iran-U.S. Claims Tribunal in The Hague.

1979: Executive Order 12170

Declares a national emergency during the hostage crisis and blocks property interests linked to the government of Iran. The emergency has been renewed annually since that time.

³⁰ "State Sponsors of Terrorism," U.S. Department of State, available at <https://www.state.gov/state-sponsors-of-terrorism/>, accessed on August 25, 2020.

³¹ "Text of Agreement between Iran and the U.S. to Resolve the Hostage Situation," *The New York Times*, January 20, 1981, available at <https://www.nytimes.com/1981/01/20/world/text-of-agreement-between-iran-and-the-us-to-resolve-the-hostage-situation.html>, accessed on August 25, 2020.

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.