

IRAN SANCTIONS

The U.S. government (USG) maintains several sanctions authorities under which it can target persons involved in human rights abuses and corruption in Iran. The most relevant programs are what this paper refers to as the **Iran Human Rights**, the **Iran Human Rights & Information Technology**, the **CAATSA**, the **Iran Sanctions Reimposition**, and the **Iran Supreme Leader's Office programs**.

Collectively, these programs authorize targeted sanctions for an array of Iran-related human rights abuses. The scope of sanctionable abuses under these programs extends beyond the "serious human rights abuse" standard of the Global Magnitsky program. Unlike the Global Magnitsky criteria, some of these programs also target abuses that do not necessarily involve physical violence or restraint of liberty, such as those committed via information technology. Some of these programs also enable sanctions for a limited set of corrupt acts.

These sanctions are distinct from the more sweeping comprehensive sanctions the U.S. government has imposed on Iran.

History

The USG first imposed sanctions on Iran in 1979 in response to the Iranian hostage crisis.¹ It did not explicitly incorporate human rights abuses as grounds for targeted sanctions until 2010. In 2015, Iran, the U.S., the U.K., France, Russia, China, and Germany signed the Joint Comprehensive Plan of Action (JCPOA). In exchange for Iran's acceptance of restrictions on its nuclear energy program, nuclear-related U.S., U.N., and E.U. sanctions were lifted, but the U.S. government largely kept in place targeted sanctions that explicitly focused on human rights abuse or terrorism, intentionally excluding them from the deal. In May 2018, under the Trump administration, the U.S. withdrew from the JCPOA² and reactivated the broader sanctions. The USG has since [reiterated its intent](#) to treat nuclear and non-nuclear sanctions separately in its dealings with Iran.

Targeted sanctions authorities relevant to human rights abuse and corruption in Iran include:

1. The **Iran Human Rights program**: In 2010, shortly after Congress legislated on the issue,³ the USG issued [Executive Order \(E.O.\) 13553](#) on serious human rights abuses in Iran.

¹ See the Atlantic Council's history of U.S. sanctions against Iran [here](#).

² See National Security Presidential Memorandum, May 8, 2018, [here](#).

³ See the Comprehensive Iran Sanctions, Accountability, and Divestment Act of 2010 [here](#).

2. The **Iran Human Rights & Information Technology program**: In 2012, the USG issued [E.O. 13606](#) to prevent persons in Iran and Syria from facilitating or committing serious human rights abuses via information technology (IT).⁴
3. The **CAATSA program**: In 2017, Congress passed the Countering American Adversaries Through Sanctions Act ([CAATSA](#)), which includes Iran-specific sanctions that the USG implements without a separate E.O.
4. The **Iran Sanctions Reimposition program**: In 2018, in connection with its decision to cease participation in the JCPOA, the USG issued [E.O. 13846](#), which reinstated a variety of suspended sanctions and added a new set of targeted sanctions criteria.
5. The **Iran Supreme Leader's Office program**: In 2019, the USG issued [E.O. 13876](#) with a focus on Iran's Supreme Leader and the officials and entities connected to him.

Legal Criteria

Human Rights Abuses

Under the **Iran Human Rights program**, the USG can impose sanctions on Iranian officials or those acting on behalf of the Iranian government who are responsible for or involved in the commission of "serious human rights abuses" anywhere in the world against persons in Iran, Iranian citizens or residents, or their family members, on or after June 12, 2009.⁵

The **Iran Human Rights & IT program** allows sanctions on persons who have engaged in listed activities that "could assist in or enable" the Iranian or Syrian government's "serious human rights abuses". These activities include operating or providing IT or other goods and services that facilitate computer or network disruption, monitoring, or tracking.⁶

The **CAATSA program** allows designation of any foreign person responsible for "gross violations of internationally recognized human rights," including "extrajudicial killings [and] torture" committed against whistleblowers or human rights defenders in Iran.⁷ Based on the USG's understanding of "gross violations," this prong likely applies to only state actors.

The **Iran Sanctions Reimposition program** allows designation of any person who has engaged in:

- On or after June 12, 2009, censorship or other activities that restrict Iranian citizens' exercise of freedom of expression or assembly, "limit access to print or broadcast media"
- Facilitating "intentional frequency manipulation" by the Iranian Government⁸

⁴ Because E.O. 13606 refers in its title to "Grave Human Rights Abuses by the Governments of Iran and Syria Via Information Technology," the program is often abbreviated as GHRIVITY.

⁵ For full language of this criterion, see E.O. 13553, section 1(a)(ii)(A).

⁶ See E.O. 13606, section 1(a)(ii)(A), (B).

⁷ See P.L. 115-44, Sec. 106.

⁸ See E.O. 13846, section 7(a)(v).

- On or after August 10, 2012, knowingly transferring to Iran goods, technologies, or related services that are likely to be used by the Government of Iran to commit serious human rights abuses against the people of Iran.⁹

Corruption

The Iran Sanctions Reimposition program allows designation of persons who have, since 2013, engaged in corruption or other activities related to the diversion of or misappropriation of sale proceeds of certain goods intended for the people of Iran, including agricultural commodities, food, medicine, and medical devices.¹⁰

Status-based Criteria

The Iran Supreme Leader's Office program¹¹ sanctions the Supreme Leader of Iran and his office and allows designation of any of their direct or indirect appointees.¹² This broad authority does not reference human rights abuse or corruption, but because of its breadth it can be used to sanction senior Iranian officials responsible for such acts.

Other Criteria

Other bases for sanctions include providing support for designated persons,¹³ being owned or controlled by designated persons or acting for or on behalf of designated persons,¹⁴ or engaging in sanctions evasion.¹⁵

Process and Implementation

Penalties: All Iran-related programs impose an asset freeze on sanctioned persons. U.S. citizens, companies, and other persons otherwise under U.S. jurisdiction¹⁶ cannot transact with them. These programs generally also impose visa restrictions, meaning designees under those programs cannot obtain or keep a U.S. visa. Designated individuals are publicly identified.

Implementing agencies: The Secretary of the Treasury can generally impose these sanctions, in consultation with the Secretary of State and the Attorney General. Doing so is purely discretionary.

⁹ See E.O. 13846, section 7(a)(iii), (iv).

¹⁰ See E.O. 13846, section 7(a)(i) and 7(a)(ii).

¹¹ See E.O. 13876 (2019).

¹² See E.O. 13876, section 1(a)(i), (ii).

¹³ See E.O. 13553, section 1(a)(ii)(B); E.O. 13606, section 1(a)(ii)(C); E.O. 13846, section 7(vi); E.O. 13876, section 1(a)(ii)(C).

¹⁴ See E.O. 13553, section 1(a)(ii)(C); E.O. 13606, section 1(a)(ii)(D); E.O. 13846, section 7(vii); E.O. 13876, section 1(a)(ii)(D).

¹⁵ See E.O. 13608 (2012).

¹⁶ [31 CFR § 560.314](#).

Patterns of Use

As of April 2024, the USG has designated more than 550 persons¹⁷ under these Iran-related sanctions programs. Nearly 300 of these designations appear to have been based on human rights abuse and 25 on corruption.

Examples

Human Rights Abuses by Intelligence Ministry: In November 2020, the USG designated Mahmoud Alavi, then-head of Iran's Ministry of Intelligence and Security (MOIS), under the **Iran Human Rights program**. The MOIS as a whole was previously designated in 2012 under the same program. According to the USG, MOIS agents are responsible for "beatings, sexual abuse, prolonged interrogations, and coerced confessions of prisoners, particularly political prisoners." Additionally, MOIS has "employed mock executions and forms of sexual violence in its interrogations of prisoners" and its agents have arbitrarily arrested and detained members of Iran's Baha'i religion. Alavi was said to be complicit in the violent crackdown on Iranian protestors in November 2019, as security forces killed at least 304 people and detained around 7,000 people to suppress demonstrations sparked by a sudden hike in gas prices.

Violent Suppression of Peaceful Protestors: The USG has frequently used sanctions to respond to the Iranian regime's crackdown on protests. In 2010, after the brutal suppression of civilian protests sparked by Iran's 2009 election, the USG sanctioned eight Iranian officials under the **Iran Human Rights program** for committing human rights abuses including beatings, extrajudicial killing, and arbitrary arrests and detentions of the protestors.

Since September 2022, the USG has imposed thirteen rounds of sanctions¹⁸ under the **Iran Human Rights** and **Iran Sanctions Reimposition programs** in connection with protests following the death in custody of Mahsa Amini, a 22-year-old who was arrested and detained for allegedly wearing the hijab improperly. These sanctions target the Morality Police, Iranian security and government officials implicated in violence against protestors, prison authorities involved in detaining demonstrators, media personnel responsible for airing coerced confessions linked to the protests, and officials responsible for suppressing freedom of expression online by shutting down Iran's internet.

Supreme Leader's Parastatal Company: In January 2021, the USG designated the organization called "Execution of Imam Khomeini's Order" (EIKO), an entity under the direct supervision of Iranian Supreme Leader Ali Khamenei, for being owned or controlled by the Supreme Leader of Iran. In the press release, the USG referenced EIKO's role in the supreme leader's unaccountable control over the Iranian economy. EIKO has been described as a "business juggernaut" with a stake in nearly every sector of the Iranian economy, including energy, telecommunications, and financial services. According to the USG, EIKO "enable[s]

¹⁷ These designations include 274 entities, 255 individuals and 25 vessels.

¹⁸ See sanctions issued on [9/22/2022](#), [10/6/2022](#), [10/26/2022](#), [11/16/2022](#), [11/23/2022](#), [12/9/2022](#), [12/21/2022](#), [1/23/23](#), [3/8/2023](#), [4/24/2023](#), and [9/15/2023](#).

Iran's elite to sustain a corrupt system of ownership over large parts of Iran's economy." Additionally, the EIKO has "confiscat[ed] land and property from opponents of the regime, including political opponents, religious minorities, and exiled Iranians."

Serious Human Rights Abuses Against Women and Girls: To mark International Women's Day in March 2023, the USG [issued sanctions](#) against two Iranian prison officials, among others, for serious human rights abuses against women and girls. The action was taken in coordination with the E.U., U.K., Australia, and other partners to demonstrate "a unified commitment to holding the Iranian regime to account for denying the women and girls of Iran their human rights and dignity." The designated officials were responsible for overseeing prisons where female inmates have faced torture, forced confessions, denial of access to medical care, and sexual violence, among other abuses.

Hostage Taking of U.S. Nationals by IRGC Forces: The USG has also used thematic programs to target Iranian actors for human rights abuses, such as wrongful detention and hostage-taking under E.O. 14078. In April 2023, the U.S. [issued sanctions](#) under E.O. 14078 targeting four senior officials of Iran's Islamic Revolutionary Guard Corps Intelligence Organization (IRGC-IO) for their role in the hostage-taking or wrongful detention of U.S. nationals in Iran. In September 2023, the U.S. [imposed](#) additional sanctions under this authority against former president Mahmoud Ahmadinejad for supporting the MOIS' role in detaining several U.S. nationals, including Robert "Bob" Levinson.