



CONGRESSWOMAN
CLAUDIA TENNEY

REPORT ON IRGC TERRORIST ACTIVITY





"Iran's Islamic Revolutionary Guard Corps is a militant terrorist organization that answers only to Supreme Leader Khamenei, who uses the IRGC to spread terror and mayhem in the name of his theocratic regime. Emboldened by weak American leadership, the IRGC has in recent years become more reckless and provocative, threatening America's allies and partners and bringing the entire Middle East closer to war. I was proud to lead the charge to designate the IRGC as a foreign terrorist organization when I was Secretary of State, and I fully support Congresswoman Tenney's efforts to encourage our allies to follow suit."

- **Mike Pompeo**, Former Secretary of State



"Congratulations to Representative Claudia Tenney and her team on the publication of this important report. I was proud to participate in the process that finally designated Iran's Islamic Revolutionary Guard Corps a Foreign Terrorist Organization during the Donald J. Trump administration, an action that formally recognized the Iranian regime not only as the world's leading state sponsors of terrorism through proxies such as Hezbollah, Hamas, and the Houthi, but also as a leading active participant in terrorism through its own IRGC. Given the Biden administration's determination to appease and accommodate the Islamic Republic, as well as to engage them diplomatically through intermediaries, it is now up to Members of Congress such as Representative Tenney to carry on this fight by making the case to partners and allies that the IRGC is in fact a terrorist entity and should be shunned as such."

- **Victoria Coates**, Former Deputy National Security Advisor for Middle East and North African Affairs

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“The IRGC is a global threat that requires a global response. If the IRGC can run free in Europe and Asia it can threaten Americans and our allies, move more money and weapons, and build its strength. We need to press every friendly nation to close the gaps and loopholes that allow the IRGC to survive and thrive as a danger to all of us—and as the main oppressor of the Iranian people.”

- Elliott Abrams, Former Special Representative for Iran

DEAR FRIEND,

While the Iranian people fight for their freedom inside Iran, we must do more to support their noble efforts from the outside. Despite not being the actual military of Iran, the Islamic Revolutionary Guard Corps (IRGC) is the primary military power in Iran. The Islamic Republic of Iran depends on it to quash rebellions, secure its borders, oppress its people, and support its terrorist proxies operating across the Middle East. Since the current protests in Iran broke out last year, over 19,000 Iranians have been arrested, and at least 529 Iranians have been killed, including 71 children. However, more are being killed each passing day as protests continue. Additionally, the Islamic Republic has begun executing arrested protestors, with four Iranians having already been killed. The IRGC has played an integral role in suppressing these protests and carrying out these arrests, killings, and executions.



However, the IRGC's malignant actions expand far beyond Iran's borders. It actively expands the Islamic Republic's influence throughout the Middle East by creating and supporting other proxy and partner terror groups, including the Houthis, Hamas, and Hezbollah. The IRGC has inserted itself into virtually every conflict in the Middle East, from Syria and Lebanon to Yemen and Iraq. It is, without question, the most destabilizing force in the region. The IRGC's support for its terrorist proxies in Iraq directly contributed to the deaths of at least 603 U.S. servicemembers and wounded many, many more. The region has made historic progress toward peace in recent years with the landmark Abraham Accords. But this peace is a fragile one so long as the IRGC works overtime to turn back the clock by sowing more chaos and greater division in the region.

Finally, beyond the Middle East, the IRGC also works to export terrorism globally through sleeper cells and foreign assets, including in many Iranian embassies. Through their extensive holdings in Iran and black-market operations, the IRGC finances terrorism abroad. This includes attempted assassinations on U.S. officials, terrorist plots in countries like Germany and Argentina, and attacks against regime dissidents around the world. The IRGC is not merely a threat to the Iranian people or just the people of the Middle East – it poses a global threat to peace and security.

This congressional report details key information about the IRGC's terrorist activity and vast terrorist network. It further summarizes the steps the United States and other countries have taken to designate the IRGC as a foreign terrorist organization or terrorist entity. Finally, it is a call to action that urges those countries that have not yet designated the IRGC to take action. Together with our allies, there is much more that can be done to significantly weaken the IRGC and diminish its ability to oppress its people and terrorize the world.

This is among the most urgent foreign policy agenda items today. It is my mission to work with other members of Congress, the Biden administration, and our allies to expand the number of countries and multi-national organizations that have designated the IRGC as a foreign terrorist organization. I hope you will read this report, share the information it includes, and join me in in this vitally important national security mission.

Sincerely,

A handwritten signature in black ink that reads "Claudia Tenney". The signature is fluid and cursive, with a long, sweeping tail on the final letter.

CLAUDIA TENNEY
Member of Congress

BRIEF HISTORY OF IRGC TERRORISM

The Islamic Revolutionary Guard Corps (IRGC) was created after the Iranian Revolution in 1979 by Ayatollah Ruhollah Khomeini, with its goals enshrined in the Constitution of the Islamic Republic of Iran. Under the Constitution, the IRGC is “responsible not only for guarding and preserving the frontiers of the country, but also for fulfilling the ideological mission of jihad in God’s way; that is, extending the sovereignty of God’s law throughout the world.”

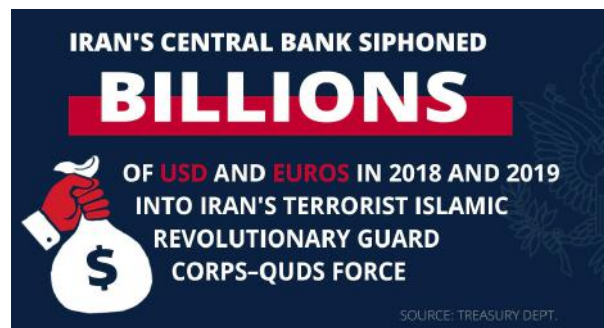
After the 1979 Revolution, Khomeini created parallel institutions to those inherited from the monarchy to ensure loyalty and support for the regime. Many of the inherited institutions were suspected to still be loyal to the Shah and not the regime. Thus, while the Islamic Republic’s formal army and military apparatus still exist, the IRGC is an extra-military entity that was designed to protect the Islamic revolution at home and spread Islamism abroad through whatever means necessary.

The IRGC’s power expanded when Khomeini’s successor, Ali Khamenei, became Supreme Leader in 1989. As President of Iran, Khamenei developed key relationships with the IRGC’s commanders during the 1980-1988 Iran-Iraq War and depended on their support during his ascension to power. Unlike Khomeini, Khamenei is not a charismatic or popular leader and relied on institutional support from groups like the IRGC to cement his authority. Khamenei, in part, bought the support of the IRGC by granting them larger swaths of control over the economy. Today, it is estimated that the IRGC and its affiliates control vast portions of Iran’s formal and informal economies, with a heavy role played in illegal sanctions-busting and smuggling operations.

The IRGC has a strong history of violently silencing dissent within Iran. In 2009, the IRGC successfully quashed the Green Movement. Now, the regime relies so heavily on the IRGC, they have an unprecedented amount of power and freedom of operation. After this success, the Basij, a volunteer group of grassroots zealots committed to advancing the revolutionary objectives of the Supreme Leader, was formally moved under the control of the IRGC’s Ground Force. This provided the IRGC even greater power over the streets of Iran.

The IRGC has also conducted paramilitary operations outside of Iran’s borders, both directly and indirectly through its proxies. In 1983, the IRGC-backed proxy terror group Hezbollah carried out an attack on American and French military barracks in Lebanon at the direction of the Iranian regime. This attack killed 241 U.S. servicemembers and 58 French servicemembers. Hezbollah was trained, financed, armed, and established by the IRGC. Since 1988, the Quds Force has been the primary branch of the IRGC responsible for attacks outside of Iran’s borders, targeting Iranian dissidents, Jews, and the United States. The Quds Force uses bombings, assassinations, and terrorist proxy and partner groups to carry out its goals, and is a serious global threat. Under Qasem Soleimani, a prominent former commander of the Quds Force from 1997 to 2020, the organization reached a new level of lethality and brutality abroad.

Under the leadership of President Donald J. Trump and Secretary of State Mike Pompeo, in 2017, the U.S. government sanctioned the IRGC as a Specially Designated Global Terrorist. Then, the United States formally declared the IRGC to be a foreign terrorist organization in 2019. In 2020, the United States killed Qasem Soleimani, shortly after his arrival at Baghdad Airport, in violation of the United Nations’ travel ban, to actively plan further attacks on American installations. While the United States has led the charge to hold the IRGC accountable, the United States cannot combat the IRGC alone. Further, given the global threat posed by the IRGC, the United States should not be in this fight alone. Effectively and successfully crippling the organization requires a global effort.



MEET THE LEADERS & BRANCHES OF THE IRGC



The IRGC is comprised of six branches, which are all overseen by **Major General Hossein Salami**. While these branches of the IRGC fulfill differing roles, ultimately, they represent one organization

with the unified mission of protecting the revolution at home and spreading it abroad. The notion that one branch of the IRGC can be designated as a terrorist organization but not another is ludicrous. I implore you to keep this in mind as you read about the different branches. Further, each branch of the IRGC operates as an extra-military organ, working in parallel to the Islamic Republic's actual military. This too must be kept in mind. The IRGC is not the Islamic Republic's military. It is a radicalized and weaponized group operating outside of the control of Iran's military to advance fundamentally radical objectives.



The IRGC Ground Force is comprised of approximately 150,000 troops commanded by **Brigadier General Mohammad Pakpur**. Previous IRGC top commander Mohammad Ali Jafari

implemented the "Mosaic Doctrine," which divides the Ground Force into 31 provincial units, plus a unit in the city of Tehran. This is designed to combat a hypothetical quick invasion, like the strategy used by the U.S. to topple Saddam Hussein. The Ground Force is known for using excessive force to suppress and quash any form of rebellion or protest, such as the Kurdish Separatist movement or the current protests in Iran. The Ground Force has also been deployed to foreign countries, like Syria, to advance the mission of the IRGC by backing the Assad regime. In September 2022, the IRGC Ground Force launched a missile and drone attack in the Iraqi Kurdistan region that killed an American citizen.



The IRGC Navy Force is comprised of approximately 20,000 troops commanded by **Rear Admiral Alireza Tangsiri**. Notably, Rear Admiral Tangsiri is one of Ayatollah Khamenei's favorite

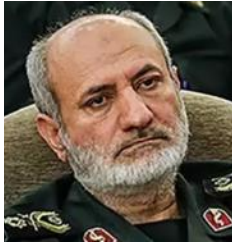
commanders. The Navy Force is primarily designed to fend off a larger Navy, like that of the United States. To this end, the Navy Force has a large number of underwater mines, drones, anti-ship missiles, and speedy vessels to fend off a bigger, slower Navy. The IRGC Navy Force poses a direct threat to energy markets and global shipping given Iran's proximity to the Strait of Hormuz, a critical waterway where 20 to 30 percent of the world's energy supplies flow. The Navy Force primarily attacks international ships in the Strait, often in retaliation to gain leverage, such as after the seizure of an Iranian ship violating international sanctions. The Navy Force will then negotiate the return of the ship in exchange for sanctions relief, prisoners, or financial incentives. It is difficult to distinguish the IRGC Navy's actions from those of pirates.



The IRGC Aerospace Force is comprised of approximately 15,000 troops commanded by **Brigadier General Amir Ali Hajizadeh**. The Aerospace Force is primarily charged with Iran's missile programs

and its attempts to improve the accuracy of its ballistic missiles to attack Israel from within Iran. Iran's missile arsenal is the largest in the Middle East and concerningly, many of these missiles are nuclear capable. After the killing of Qassem Soleimani, the IRGC's Aerospace Force has also played a more prominent and direct role in drone operations outside of Iran. Under General Hajizadeh, the Aerospace Force has directly and unlawfully attacked Israeli vessels with drone strikes, rather

than using proxies such as Hezbollah, a departure from previous norms. Additionally, the Aerospace Force partially oversees Iran's air defense systems, which are strategically placed to protect military assets, such as secret underground nuclear facilities. On January 8, 2020, the IRGC Aerospace Force shot down Ukraine International Airlines Flight PS752, a civilian aircraft, with a surface-to-air missile, killing all 176 passengers and crew.



The IRGC Intelligence Organization is commanded by **Brigadier General Mohammad Kazemi**. In 2009, the Intelligence Organization was re-established by Ayatollah Khamenei to suppress the Green Movement protests. Today, the Intelligence Organization works to arrest, interrogate, and torture dissidents and provides support to the Quds Force as they perform external operations. The Intelligence Organization also works with proxy terrorist organizations, such as the Houthis or Hezbollah, by feeding them information and targets to carry out terrorist attacks against. The Intelligence Organization is also responsible for counterintelligence. The previous commander of the Intelligence Organization Hossein Taeb was dismissed after the killing of Quds Force United 840 Deputy Commander Hassan Sayyad Khodaei.



The IRGC Basij is comprised of approximately 450,000 active reserve troops commanded by **Brigadier General Gholamreza Soleimani**. The Basij prey on young Iranians, typically the rural, poor, and uneducated, with promises of greater status and more wealth and power. The Basij are primarily propagandists that promote the ideology and teachings of the regime and work to counter non-regime sources and influences. The Basij also assist the Morality Police in enforcing Iran's strict dress codes by beating and brutalizing women, such as Mahsa Amini. However, the most important role of the Basij is to be a large reserve

force in the event of a national emergency like the recent protests. During the November 2019 protests, the Basij was the force primarily responsible for the killing of up to 1,500 protesters and during the current protests many Basij forces have been called up to fill a similar role.



The IRGC Quds Force is comprised of approximately 5,000 troops commanded by **Brigadier General Esmail Ghaani**. Unlike the other branches of the IRGC, which have both internal and external functions, the Quds Force is solely focused on external affairs with foreign cells and agents all around the world. The Quds Force has carried out attacks globally in countries like Germany, the U.S., India, and Argentina. The Quds Force also works closely with allied groups like proxy terrorist groups, transnational criminal organizations (TCOs), and drug cartels. The Quds Force is arguably the most brutal and extreme of the branches of the IRGC, as they have been known to use kidnapping, bombings, assassinations, and proxy wars to target enemies and sow chaos. According to the U.S. military, Quds Force-supported proxies in Iraq killed at least 603 American servicemembers and injured many more. The Quds Force carries out frequent targeted killings of Iranian dissidents living abroad, including allegedly inciting a stabbing attack in upstate New York against Salman Rushdie, plotting an attempted assassination of President Trump's National Security Advisor John Bolton, and targeting Israeli embassy personnel in India multiple times. The Quds Force is also charged with training and supplying Iran's proxies across the Middle East in violation of international law and United Nations sanctions, such as the Houthis in Yemen, Hezbollah in Lebanon, and Hamas and Palestine Islamic Jihad.

THE IRGC'S THREE PILLARS OF TERROR

1. THE IRGC'S OPPRESSION OF ITS OWN PEOPLE

First and foremost, the IRGC was designed to act as the Ayatollah's praetorian guard, whose top mission is to prevent an invasion and protect the revolution. As such, while the IRGC spreads its influence outside of Iran's borders, its top focus has always been the internal affairs of Iran. The civil unrest of the last 15 years since the Green Movement has increased the regime's reliance on the IRGC, and has in turn, increased in the IRGC's power and brutality.

After the announcement that Mahmoud Ahmadinejad, the hardline incumbent, beat popular reformist Mir-Hossein Mousavi in the 2009 Presidential election, there were immediate accusations of election rigging and statistical anomalies from both inside and outside Iran. The Green Movement broke out in response with thousands of Iranians protesting the election results. While the allegations of election rigging have never been definitively proven, it would track with a regime that already pre-approves all candidates for public office.

In 2009, Ayatollah Khamenei relied on the IRGC and the Basij, which at the time was a separate unit, to quash the protests. The IRGC and the Basij began detaining, brutalizing, and even killing protesters. By the end of the protests, Mousavi and 4,000 Iranians were arrested, at least 70 Iranians were killed, and others were tortured and victims of sexual violence.

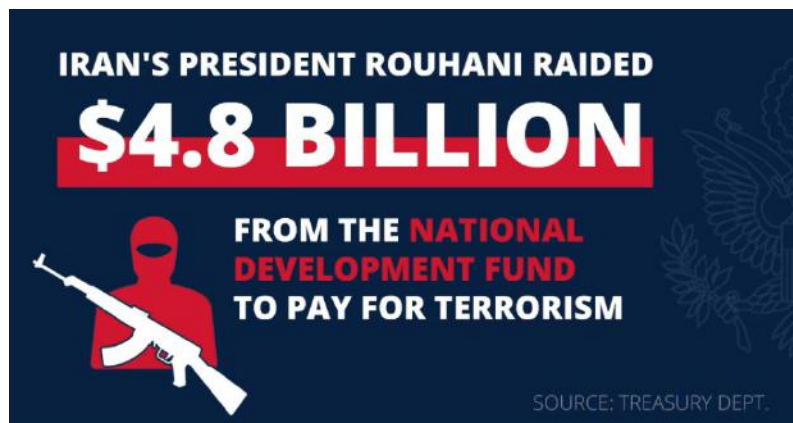
While the Green Movement was successfully quashed, the Iranian regime was left weakened and even

more dependent on the IRGC. In a leaked video from the IRGC's leader at the time, General Mohammad Ali Jafari stated that the regime could no longer count on popular support and now had to rely on institutional support, namely from the IRGC.

Over the last 15 years, the IRGC has been charged with putting down various protests that have sprung up, and each time the IRGC has responded swiftly with extreme violence. Especially after witnessing the successful protests of the Arab Spring, the regime has allowed the IRGC to act with complete impunity to do anything in its power to silence protests.

Most recently, with the protests after the tragic death of Mahsa Amini, security forces, including the IRGC, have reportedly arrested over 19,000 Iranian citizens and killed over 500 protestors, including 71 children through February 2023. While the true numbers are undoubtedly higher, these numbers are gravely concerning. This is in addition to numerous reports and documented evidence of the IRGC using child soldiers as part of the Basij to help suppress the protests.

Finally, it is crucial to note the economic stranglehold the IRGC has on the Iranian economy. After the 1979 Revolution, the Shah's wealth was confiscated by the new regime and distributed mainly among supporters, including the IRGC. The IRGC was



given control of important industries, including oil production, factories, and some ports. The IRGC often receives no-bid contracts that are far above market price to help finance its illicit activities. Estimates vary on the IRGC's control of the economy from ten percent up to fifty percent. Further, U.S. sanctions on Iran have given the IRGC greater control over the growing black markets and oil smuggling.

While the IRGC's annual budget is approximately \$5 billion per year, the IRGC also uses billions in funding from the economic industries it controls to finance its illicit activities. These funds could actually help the struggling Iranian people, but instead are used to support the IRGC's terrorism against its own people and abroad.

2. THE IRGC'S DESTABILIZATION OF THE MIDDLE EAST

As part of the IRGC mission of "jihad in God's way," the IRGC meddles in the internal affairs of other Middle Eastern countries, funding other affiliated leaders and groups in internal struggles or civil wars, often in violation of United Nations sanctions. The IRGC funds belligerents that support the Iranian regime and promote similar schools of extremist religious thought. This has made conflicts longer and bloodier, while helping to prop up other bad actors in the region. While these efforts by the IRGC are not new, below is a brief summary of some of the IRGC's recent involvement in other Middle Eastern conflicts.

SYRIA

Since Khomeini's rise to power, Syria has been Iran's only other consistent and stable ally. Despite being a Sunni majority country, Syria is ruled by an Alawite (a sect of Shia Islam) minority government led by Bashar al-Assad. As such, the IRGC has supported the Syrian government even before the 2011 Syrian

Civil War broke out, having approximately 2,000-3,000 troops stationed in Syria to train local militias and to funnel arms to Hezbollah in Lebanon.

However, after the outbreak of the Syrian Civil War, the IRGC stepped up its support of the Assad regime. As of October 2015, the IRGC had approximately 7,000 members and volunteer soldiers fighting in Syria and training local troops, plus an additional estimated 20,000 non-Syrian Shiite fighters through proxies backed by the IRGC. These forces represent the largest bloc of non-Syrian fighters involved in the war, and the IRGC's troops and support have been critical to the Syrian regime maintaining its stranglehold on the country. There is abundant credible reporting to suggest that the IRGC has even recruited Afghan children living in Iran to fight in Syria, a clear violation of international law and something no legitimate military would do.

IRAQ

Since the Iran-Iraq War and the collapse of Saddam Hussein, the IRGC has sought to control Iraq's internal affairs. After creating a hospitable environment for ISIS's rise by destabilizing the region, the IRGC was forced to help Iraq repel the rise of ISIS through military advisors and aid. However, the IRGC's involvement in Iraq extends far beyond simply repelling ISIS. Since the creation of the Islamic Republic of Iran, most, if not all, of the Iranian Ambassadors to Iraq have been veterans of the Quds Force. Iran also provides funding for political parties that are aligned with the Iranian regime in addition to funding, arming, and training paramilitary terrorist proxy groups, such as Kata'ib Hezbollah, that have pledged allegiance to the Islamic Republic of Iran. These paramilitary groups carry out IRGC-funded and planned attacks on U.S. troops in Iraq and Iraqi politicians that oppose Iran's influence in the country. The IRGC's continued support to Iraqi militias has been in violation of United Nations Security Council resolutions. Further, the United States military estimated that the IRGC's support of Iraqi militias is directly responsible for the deaths of at least 603 U.S. servicemembers.

YEMEN

The IRGC has long been accused of backing the Houthi (Shiite) rebels in Yemen that are currently engaged in a civil war against the Sunni-majority government. While Iranian officials have denied these claims, multiple IRGC commanders have been quoted saying they are supporting the Houthis, including Qasem Soleimani, the former head of the Quds Force. This support includes funding, training, intelligence, and the direct provision of armaments in violation of the United Nations Security Council resolutions 2231 and 2254, including rifles, missiles, launchers, and drugs. Several Iranian-made weapons have been intercepted by U.S. military personnel on their way to Yemen on multiple occasions.

Beyond Iran's ideological alignment with the Houthis, Yemen has become a proxy war between Iran and Saudi Arabia, which backs the Sunni-majority Yemeni government. Former IRGC commander Nasser Shabani said "We [the IRGC] told Yemenis [Houthis] to strike two Saudi oil tankers, and they did." While the IRGC denied this quote and any support for the Houthis, missiles launched into Saudi Arabia have evidence of being designed and manufactured by Iran.

LEBANON

Since Hezbollah's founding in 1982, the IRGC has been involved in training and funding the group to equip Lebanon to attack Israel. Since then, Hezbollah has become a proxy group through which the IRGC attacks Israel and other countries like the United States. By using proxy groups, the IRGC and Iran hope to evade any consequences for these attacks, despite providing the funding, training, and intelligence to carry the attacks out.

In August 2022, IRGC Commander Salami warned Israel that Hezbollah has more than 100,000 missiles in Lebanon ready to attack Israel at any moment. Hezbollah has also aided and fought alongside the Assad regime in Syria and the Houthis in Yemen,

though unlike the IRGC, Hezbollah does not deny aiding the Houthis. Notably, for political reasons, some countries seek to differentiate between the political wing of Hezbollah and its military wing, with some only recognizing the military wing as a terrorist organization rather than the entirety of Hezbollah. However, Hezbollah itself does not differentiate between the two and IRGC funding and aid supports the entirety of the organization.

GAZA & JUDEA AND SAMARIA

In addition to supporting Hezbollah in Lebanon, Iran actively supports its partner group Hamas, which operates in both Gaza & Judea and Samaria. However, when Hamas declined to support the Assad regime in Syria, the IRGC cut off funding and support, though the relationship has since improved. Since then, the Palestine Islamic Jihad (PIJ), an IRGC proxy group, has seen an increase in funding from the IRGC and now receives roughly \$70M per year from the IRGC, in addition to training and intelligence support. Both organizations are rightly designated as terrorist organizations by the United States.

3. THE IRGC'S THREAT TO GLOBAL SECURITY

Beyond suppressing dissent at home and violently meddling in the Middle East, the IRGC carries out "jihad in God's way" around the world as well, often by attacking dissidents directly or working through proxies to fuel terrorism. The threat posed by the IRGC is not limited to the Iranian people or their neighboring countries, but attacks have been carried out in countries like Argentina, Germany, and the United States. This poses a threat to global peace and security and must be addressed. Below are but a few examples of the IRGC's attacks around the world.

GERMANY MYKONOS RESTAURANT ASSASSINATIONS

In September 1992, three IRGC-affiliated assassins killed Iranian-Kurdish opposition leaders Sadegh Sharafkandi, Fattah Abdoli, Homayoun Ardalan, and their translator Nouri Dehkordi at the Mykonos Restaurant in Berlin, Germany. During the trial for the three assassins, the First President of Iran Abolhassan Banisadr testified that the killings were personally ordered by Khamenei and the then-President Ali Akbar Hashemi Rafsanjani. As part of the trial, the German court issued an arrest warrant for the then-Iranian Intelligence Minister Ali Fallahian who was found complicit in the attack. The IRGC was also found to have trained the assassins in Iran. Europe broke diplomatic relations with Iran for nearly a year following the assassinations.

BOMBING IN ARGENTINA

In July 1994, the Asociación Mutual Israelita Argentina (AMIA), a Jewish Community Center, was the target of a terrorist bombing attack in Buenos Aires, Argentina. A suicide bomber, Ibrahim Berro, drove a bomb-laden van into the building, killing 85 people and injuring at least 300. To date, it remains the deadliest terrorist attack in Argentine history. The Argentine authorities and the exhaustive investigation by special prosecutor Alberto Nisman, determined that the attack was planned by the Islamic Republic's senior officials and carried out by the Lebanese militant group Hezbollah. INTERPOL has "red notices" for 5 Iranian officials and one Lebanese man in connection with the terrorist attack. Despite the evidence of Iran's role, the regime denied any responsibility and claimed the accusation is a "Zionist plot."

U.S. MURDER-FOR-HIRE PLOT

In August 2022, the U.S. Department of Justice (DOJ) charged Shahram Poursafi, a member of the IRGC, for plotting to assassinate former National Security Advisor John Bolton. As early as October 2021, Poursafi began his plot to assassinate Ambassador Bolton by attempting to pay individuals \$300,000 to assassinate Ambassador Bolton. In subsequent months, Poursafi had compiled information from numerous sources and planned the assassination attempt with the IRGC.

The FBI later discovered that former Secretary of State Mike Pompeo was also a potential target. Apart from the \$300,000 bounty on Bolton, the DOJ found out a \$1 million bounty on an undisclosed, high-ranking official in the Trump Administration. It is suspected that this was an attempt by the IRGC to seek revenge for President Trump's decision to kill IRGC Quds Force Commander Qasem Soleimani, as he was planning further attacks on U.S. Forces in Iraq.

RUSSIA DRONE FACILITY

In February 2023, Russia and Iran announced a \$1 billion deal to build a factory in Russia to produce up to 6,000 Iranian-designed drones to use against Ukraine in Russia's war of aggression. This initiative involved the IRGC Aerospace Force Research and Self-Sufficiency Jihad Organization head Brigadier General Abdollah Mehrabi. For years, there have been concerns about growing ties between Iran and Russia, but now, the IRGC is leading the effort to share military technology for use in Russia's war of aggression against Ukraine. Iran is reportedly also providing Russia with ballistic missiles for its war in Ukraine.

"Today, the IRGC is the most dangerous terrorist group on the planet, with the history, capability, and intention to conduct attacks across six continents. The international community needs to stop letting the IRGC's agents, weapons, and business into their borders and start treating the IRGC for what it is: a terrorist group."

- **Michael Makovsky, Ph.D., President & CEO, JINSA**



STATUS AND ELIGIBILITY OF FOREIGN TERRORIST DESIGNATIONS

As members of the United Nations, countries are required to have laws for compliance with UN sanctions and terrorist designations. In addition to the UN’s sanctions and designations, many countries have their own legal authorities by which they can designate foreign terrorist organizations and apply corresponding sanctions. In addition to being a mechanism to stem the flow of funds to terrorist entities and limit the activities of individuals and entities associated with the FTO, these designations also alert anyone who may directly or indirectly, on purpose or inadvertently, engage with those on terrorism lists of the danger of working with sanctioned groups. In 2017, the U.S. government sanctioned the IRGC as a Specially Designated Global Terrorist. Then, in 2019, under President Trump and Secretary of State Pompeo, the U.S. designated the IRGC as a foreign terrorist organization and encouraged our allies to follow suit.

Additionally, the Financial Action Task Force (FATF) is an international organization dedicated to combatting terrorist financing. The FATF has placed Iran on its blacklist for failing to implement the FATF action plan to address the Islamic Republic’s money

laundering and terrorist financing. Iran’s place on the blacklist sends a strong and unequivocal message to international businesses and financial institutions, that it’s not safe to do business with Tehran until it complies with its FATF obligations. All of the countries discussed below are either members of the FATF or of their regional groups.

Below is information about some selected U.S. allies and their status in designating the IRGC as a terrorist organization under their national laws.

EUROPEAN UNION

Under the EU Council’s Common Position 931, organizations can be listed as terrorist organizations if “a decision has been taken by a judicial or equivalent competent authority” that they are a terrorist organization. This decision can be in the form of an investigation or prosecution for terrorist acts, conviction for such offenses, or those designated by the United Nations Security Council (UNSC) as terrorist groups. Proposals for designations of

terrorist organizations can come through member states after a state body has ruled as such, or a third-party country, such as the United States

Despite the European Parliament voting 598-9 in favor of designating the IRGC as a terrorist organization, the EU Foreign Policy Chief Josep Borrell has incorrectly insisted that an EU court ruling is needed first.



The European Court of Justice has stated that investigations and convictions from non-EU states can be used to add to the EU's terrorist list. As such, previous U.S. Department of Justice investigations can be used to make this designation.

In addition to the U.S. Murder-for-Hire Plot case discussed earlier, in 2019, two IRGC operatives pled guilty to surveilling Iranian dissidents and Jews in the United States. In another case, the United States indicted four IRGC operatives for plotting to kidnap Masih Alinejad, an Iranian-American residing in New York. Likewise, there are determinations in Europe that the IRGC has engaged in terrorism on European soil. Alternatively, any of these U.S. DOJ investigations could be sufficient justification for the EU to designate the IRGC should it decide to do so. However, currently, the EU is only sanctioning individuals associated with the IRGC rather than proscribing the IRGC as a whole.

UNITED KINGDOM

Under the Terrorism Act of 2000, the United Kingdom can designate a group as a terrorist organization if it commits, participates in, prepares for, promotes, encourages, or is connected to terrorism. While the UK has designated IRGC-affiliated groups such as Hamas, Hezbollah, and PIJ as terrorist organizations, it has yet to designate the IRGC as a terrorist organization. However, given the IRGC's funding of these groups, it clearly meets the threshold for designation as a terrorist organization under the UK's laws.

Public support for designating the IRGC as a terrorist organization has grown quickly in recent months after Alireza Akbari, a British-Iranian citizen, was lured back to Iran by the IRGC and executed on bogus spying charges. On January 12, 2023, the UK House of Commons unanimously passed a nonbinding resolution urging the UK government to designate the IRGC as a terrorist organization. However, the UK Foreign Office has blocked this move because of "the need to keep communication channels open" with Iran. Such a designation would not preclude communications with Iran.

ASIA & AUSTRALIA

JAPAN

Under Japan's Foreign Exchange and Foreign Trade Law and its commitments under the International Convention for the Suppression of the Financing of Terrorism, Japan has frozen the assets of 405 terrorists and 121 terrorist organizations, including IRGC-affiliated groups like Hamas and Hezbollah. However, Japan continues to maintain close ties with the Iranian regime and despite condemning multiple IRGC attacks, refuses to designate the IRGC as a terrorist organization. Of note, in June 2019, the IRGC Navy Force attacked a Japanese-owned oil tanker in the Gulf of Oman while Prime Minister Shinzo Abe was visiting Iran.

SOUTH KOREA

Under South Korea's Act on Counter-Terrorism for the Protection of Citizens and Public Security, a terrorist group is defined as "a group of terrorists designated by the United Nations." As such, under existing law, South Korea reportedly has no legal authorities to designate the IRGC as a terrorist organization on its own without changing its existing terrorism laws. Of note, in January 2021, the IRGC Navy Force seized a South Korean oil tanker in retaliation for South Korea freezing roughly \$7 billion worth of Iranian assets due to U.S. sanctions.

AUSTRALIA

Australia's Security Legislation Amendment (Terrorism) Act of 2022 inserted terrorist offenses into their criminal code and created a list of terrorist organizations. This list is maintained by the Attorney General in coordination with the Australian Security Intelligence Organisation. Under this law, a group may be added to the list if it "is directly or indirectly engaged in preparing, planning, assisting in, or fostering the doing of a terrorist act; or advocates the doing of a terrorist act." Australia has designated multiple IRGC-affiliated groups as terrorist

organizations, including Hamas, Hezbollah, and PIJ.

Recently, Australia placed sanctions on parts of the IRGC, including its Quds Force, but stopped short of designating the entire IRGC as a terrorist organization. However, after an extensive inquiry and investigation, on February 1, 2023, the Australian Senate recommended designating the IRGC as a terrorist organization in its entirety.

INDIA

India's Unlawful Activities (Prevention) Act defines a terrorist organization as a group that commits, promotes, prepares for, or is otherwise involved in terrorism. Under this act, in addition to UN-designated terror groups, the government can designate groups, entities, and individuals as terrorists if they fall under this definition. The main purpose of this act was to ensure India's territorial integrity and sovereignty, and as such, all of India's designated terrorist groups are India-based and focused groups. The IRGC, nor any of its affiliates, are a designated terrorist organization in India. However, in 2021, the IRGC Quds Force worked with a local terror cell to plant a bomb at the Israeli embassy in New Delhi. Prior to this, in 2012, the wife of Israel's defense attaché to India was injured after an IRGC-affiliated motorcyclist attached a bomb to her car in New Delhi. The IRGC very clearly poses a threat to India's sovereignty as they continue to conduct attacks on their soil.

MIDDLE EAST

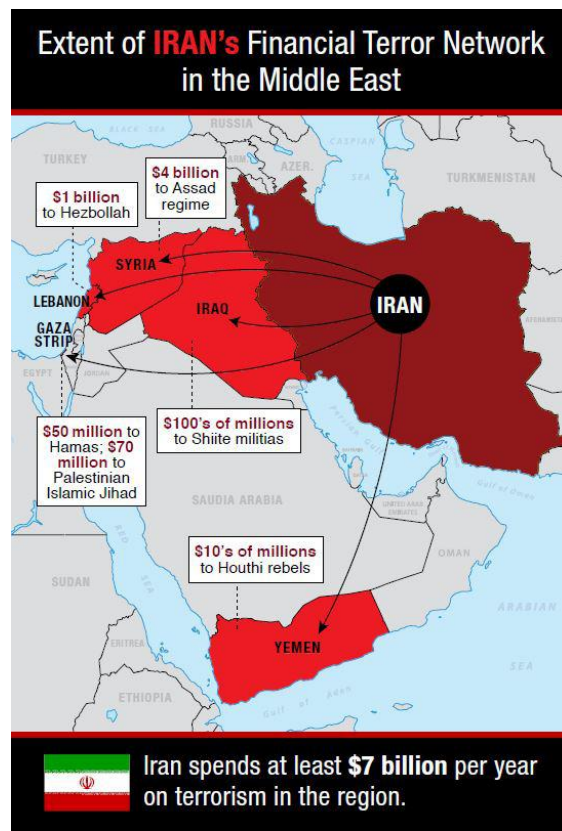
EGYPT

Under Egypt's Terrorist Entities Law, terrorist designations are made by prosecutors in a court of law, either after a verdict in a criminal trial, or as part of a specific designation request. This law only applies however if the crime is committed in Egypt, by an Egyptian, against an Egyptian, using an Egyptian flagged-means of transportation, or

harms an international or regional organization or body. It is unclear under the current law if the legislature can designate terrorist organizations, as they could prior to the law's passage.

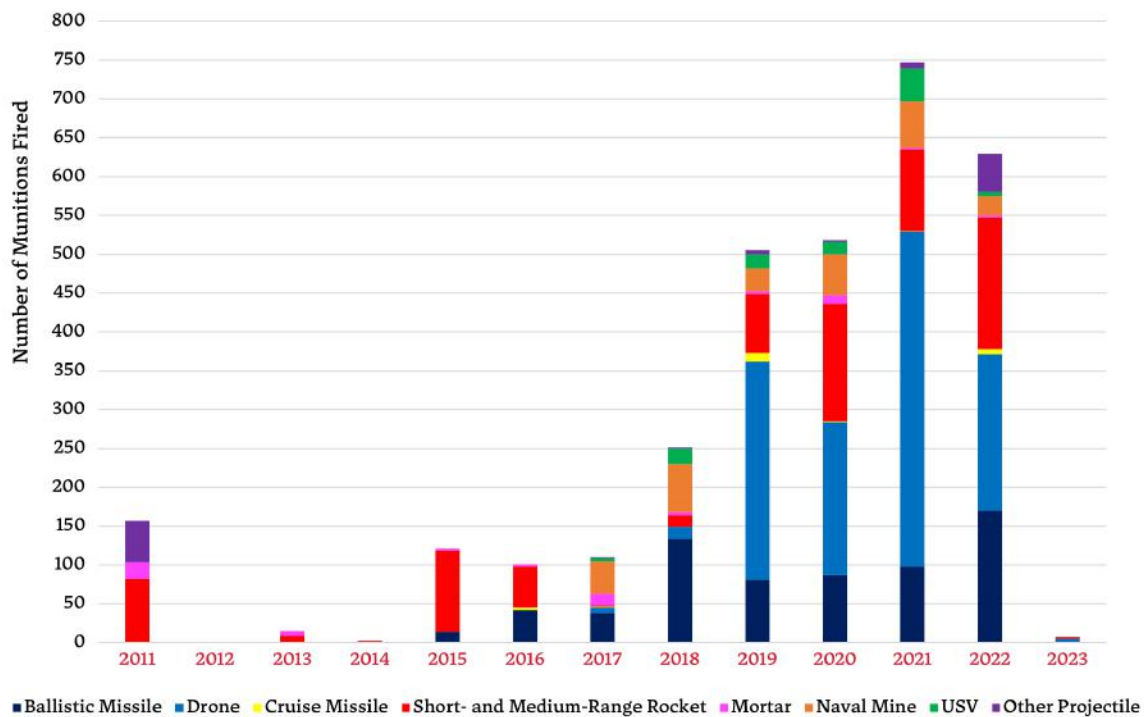
TURKEY

Under the Anti-Terror Law of Turkey, terrorist acts and groups are required to specifically target the Republic of Turkey, threaten the rights of Turkish citizens or threaten Turkey's security. As such, Turkey's focus is on internal concerns with the only non-UN-designated terrorist organizations being PKK, DHKP/C, and FETO. However, IRGC operatives have been known to operate in Turkey, even planning an attack on an Israeli consulate that was thwarted by authorities. These operations could be viewed as a threat to Turkey's security.



A 2019 graphic depicting Iran's funding of terror in the Middle East.

Iranian-linked Munitions Launched Per Year Against U.S. Personnel, Partners, and Interests in the Middle East 2011-Present



UNITED ARAB EMIRATES

Under Cabinet Resolution 74 of 2020, the UAE maintains its own Local Terrorist List in addition to UN designated individuals and groups. The Local Terrorist List includes individuals and groups that meet the criteria set forth by UNSC Resolution 1373. The UAE's Supreme Council for National Security can approve the addition of individuals or groups at any time; however, the Cabinet of the UAE must sign off on any additions. Additionally, foreign countries can submit requests to the UAE's Supreme Council for National Security for individuals and organizations to be added to the

Local Terrorist List, and the council is required to examine the request and make a recommendation to the Cabinet. While neither the IRGC nor any of its branches are included in this list, multiple IRGC-backed groups are, such as the Houthis in Yemen and Kata'ib Hezbollah in Iraq.

In 2016, the Gulf Cooperation Council, comprised of Bahrain, Kuwait, Oman, Qatar, Saudi Arabia, and the UAE, jointly declared Hezbollah a terrorist organization. However, while Bahrain and Saudi Arabia have since also designated the IRGC to be a terrorist organization, the rest of the Gulf Cooperation Council have not, despite Hezbollah being merely a proxy of the IRGC.

AMERICAS

MEXICO

While Mexico does have laws to impose financial sanctions on criminals, it lacks sufficient laws to prohibit supporting terrorism and laws to designate terrorist organizations. In recent years, there have been allegations that IRGC-affiliated groups, like Hezbollah, have operations in Mexico, making the issue all the more important. Mexico must make serious improvements in their anti-terrorism laws to effectively combat these groups on the international stage. However, of note, in 2011, Mexico did help the U.S. foil an effort by the IRGC to assassinate Saudi Arabia's Ambassador to the United States.

CANADA

Under Canada's Anti-Terrorism Act, Canada maintains a list of entities that either "have knowingly carried out, attempted to carry out, participated in or facilitated a terrorist activity or knowingly acted on behalf of, at the direction of or in association with an entity that has knowingly carried out, attempted to carry

out, participated in or facilitated a terrorist activity." While Canada designated the IRGC's Quds Force as a terrorist entity in 2012, it has yet to designate the IRGC under the Canadian Criminal Code. The IRGC is currently sanctioned under Canada's Special Economic Measures Act (SEMA), and on October 7, 2022, Prime Minister Justin Trudeau announced that Canada intends to pursue a designation under its Immigration and Refugee Protection Act as well. However, given that the Quds Force is a branch of the IRGC, it is hard to argue the IRGC has not worked "in association" with the Quds Force. In fact, the U.S. government has found the IRGC parent organization directly supports the Quds Force.

Recently, multiple Members of Parliament have urged Prime Minister Justin Trudeau to proscribe the IRGC as a terrorist organization, including the Conservative Shadow Defense Minister James Bezan. The Canadian government has claimed it does not want to designate the IRGC as a terrorist organization in its entirety because of the supposed effect on individuals forced to join the IRGC. Analysts argue there are ways to address this while still proscribing the IRGC.



"The IRGC should not be viewed as a regular standing army. Rather, it's an arm of the Islamic Republic of Iran that reaches across Iran's borders to commit terrorism against Americans and our allies. Proscribing it as the terrorist entity that it is, isn't merely symbolic but allows countries and citizens alike to hold it accountable not only in the court of public opinion but in courts of law. It makes it more difficult for the IRGC to get funds it seeks to carry out terrorism. Policymakers shoulder the responsibility not only of speaking out, but of acting decisively. This is your opportunity to make your mark."

– **Saeed Ghasseminejad**, Senior Iran and Financial Economics Advisor, Foundation for the Defense of Democracies

"This welcome report highlights the global threat the IRGC poses, including to U.S. interests and values. The IRGC, rather than safeguarding the Iranian people, advances the Islamic Revolution. Combating the national security threat from the IRGC requires a comprehensive U.S. strategy on Iran which discards the JCPOA and imposes a heavy cost on Tehran."

– **United Against Nuclear Iran (UANI)**

UNITED
AGAINST
NUCLEAR
IRAN

RELEVANT LEGISLATION IN THE 118TH CONGRESS

1. H.R. 869, THE REGIME ACT

SPONSOR: REP. JOE WILSON (SC-2)

SUMMARY: This bill requires the Secretary of State to review whether the following individuals are ineligible for entry to the U.S. under existing law: any member of the IRGC, Iranian armed forces, Iranian law enforcement, Iranian government, offices controlled by the Ayatollah, or a family member of any of these individuals.

STATUS: Awaiting consideration by the House Judiciary Committee.

2. H.R. 589, THE MAHSA ACT

SPONSOR: REP. JIM BANKS (IN-3)

SUMMARY: This bill requires the Executive Branch to provide regular determinations of whether Executive Orders 13876, 13353, and 13224, which impose sanctions on the Iranian regime for human rights abuses, support of terrorism, and corruption, can be applied to individuals in high-level positions of authority within the Islamic Republic of Iran. These Executive Orders also cover IRGC officers and soldiers.

STATUS: Awaiting consideration by the House Foreign Affairs, Judiciary, Financial Services, and Ways and Means Committees.

3. H.CON.RES.7, CONDEMNING THE IRANIAN REGIME'S HUMAN RIGHTS ABUSES AGAINST THE BRAVE WOMEN AND MEN OF IRAN PEACEFULLY DEMONSTRATING IN MORE THAN 133 CITIES.

SPONSOR: REP. CLAUDIA TENNEY (NY-24)

SUMMARY: This resolution condemns the Iranian regime for their brutality, commends the brave Iranian protesters, urges the Biden administration to support the protesters, and encourages the private sector and international community to support the protesters as well

STATUS: Passed the House of Representatives, awaiting consideration by the Senate.

4. H.RES. 288, THE ENCOURAGING THE EU TO DESIGNATE RESOLUTION

SPONSOR: REP. CLAUDIA TENNEY (NY-24)

SUMMARY: This resolution urges the European Union to designate the IRGC as a terrorist organization.

STATUS: : Awaiting consideration by the House Foreign Affairs Committee.

5. H.RES.100 - EXPRESSING SUPPORT FOR THE IRANIAN PEOPLE'S DESIRE FOR A DEMOCRATIC, SECULAR, AND NONNUCLEAR REPUBLIC OF IRAN, AND CONDEMNING VIOLATIONS OF HUMAN RIGHTS AND STATE-SPONSORED TERRORISM BY THE IRANIAN GOVERNMENT.

SPONSOR: REP. TOM MCCLINTOCK (CA-5)

SUMMARY: This resolution condemns Iran's state-sponsored terrorism and plots against dissidents, calls on the Biden administration to work with our European allies to hold Iran accountable, and supports the democratic protesters in Iran

STATUS: Awaiting consideration by the House Foreign Affairs Committee.



CONCLUSION

The brave Iranian people who are fighting for their freedom are risking their lives and their families for a better future. It is incumbent upon us to support them however we can, which includes leading an international sanctions effort against the IRGC. The IRGC's oppression of the Iranian people has been instrumental in allowing the regime to stay in power. By reducing the IRGC's ability to operate internationally, and by reducing their funds through new sanctions and regulations, we can help support the Iranian people's determination to have a government that respects their basic human rights.

The IRGC is clearly a terrorist organization. Its financing of other terrorist groups should make this obvious enough. But the IRGC has also demonstrated that it meets this definition through its actions. It has launched attacks on foreign sovereign soil, including many Western countries. It is imperative for the national security of our allies that we impose sanctions on the IRGC to the greatest extent possible.

While President Trump and Secretary Pompeo's decision to designate the IRGC as a terrorist organization was a great first step, the U.S. cannot hold the IRGC accountable for its terrorism alone. This must be a concerted effort by our allies and partners around the world. It is also simply not enough for our allies and partners to designate one branch of the IRGC, such as the Quds Force, as a terrorist organization, while allowing the rest of the organization to act unimpeded and with impunity. The various branches of the IRGC work together to commit horrendous human rights violations in Iran, the Middle East, and globally.

The IRGC is among the single greatest obstacles to peace in the Middle East. The region has made historic progress toward peace in recent years with the landmark Abraham Accords. But this peace is a fragile one so long as the IRGC works overtime to turn back the clock by sowing more chaos and greater division in the region. Leading scholars have argued that Khamenei knows that without the IRGC, he would lose his power almost immediately. Without the IRGC, the Green Movement may have succeeded, and the nationwide protests in Iran calling for an end to the regime could have already been successful in toppling the regime.

The regime's days are numbered. The resolve of the Iranian people is resolute, and we must be committed to standing with them to the end. Those with the responsibility to lead cannot shy away from taking on the IRGC's malign global influence.

Woman. Life. Freedom.



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