

MEMMO

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Designate the IRGC as a Terrorist Group

The U.S. government should formally designate Iran's Islamic Revolutionary Guard Corps (IRGC) as a terrorist group. The IRGC, both directly and through its proxies, supports terrorist activities throughout the world. This designation would clear up an anomaly in current U.S. policy: Although there is no practical difference between the IRGC and its foreign activities branch known as Quds Force (IRGC-QF), the U.S. government has only designated the latter.

The IRGC is Iran's preferred instrument for supporting global terrorism

- In 2007, the U.S. government sanctioned the entire IRGC for non-proliferation and human rights abuses under Executive Order (E.O.) 13382. Further, it designated the IRGC-QF as a terrorist group under E.O. 13224. However, there is no meaningful difference between the two.
- There is no reason for this anomaly in U.S. policy. The Quds Force is a vital component of the IRGC, and resources and personnel are often shared between the two. The leadership of the IRGC controls and directs the actions of the Quds Force.
- The IRGC is the primary Iranian actor providing support to Hezbollah, Hamas and Islamic Jihad. General Amir Ali Hajzadeh, the head of the IRGC Aerospace Force stated in November 2014 that the IRGC and Hezbollah are a "single apparatus jointed (sic) together."

An IRGC terrorist designation would not violate the Iran nuclear agreement.

- Designating the IRGC as a terrorist group would not violate the letter or spirit of the Joint Comprehensive Plan of Action (JCPOA). As the Obama Administration made clear, the JCPOA only treats nuclear issues and in no way limits U.S. freedom of action against Iran's terrorist activities.
- In an August 2015 letter to Rep. Jerrold Nadler (D-NY), President Obama wrote, "Critically, I made sure that the United States reserved its right to maintain and enforce existing sanctions and even to deploy new sanctions to address those continuing concerns, which we fully intend to do when circumstances warrant."
- At an August 2015 Senate Banking Committee Hearing, then-Acting Undersecretary for Terrorism and Financial Intelligence Adam Szubin stated: "Our sanctions list with respect to Iran will remain very extensive. We are not relieving sanctions against Iran's Revolutionary Guard Corps, the IRGC, or the Quds force or any of their subsidiaries or senior officials."

An IRGC terror designation is an appropriate response to the group's continued role in supporting global terrorism.

- A designation of the IRGC as a terrorist group would dispel any false notions that the IRGC is separate and distinct from the IRGC-QF. The United States has rightly viewed the entirety of Hezbollah as a terrorist organization, despite claims of a separation between their military and political arms. Likewise, the entirety of the IRGC is complicit in its terrorist activities, regardless of which part of the organization carries out the activity.

- Despite current U.S. sanctions, the IRGC continues to control significant parts of the Iranian economy and operates hundreds of front companies and shell organizations. A designation would renew focus on the group's role in the Iranian economy.
- A designation should be followed by a concerted effort by the U.S. Treasury Department to publically name and sanction companies owned or controlled by the IRGC, as called for in U.S. current law.
- The designation of the IRGC would also serve as a stark reminder to the international business community of the dangers in operating in the Iranian economy. Companies operating in Iran must make sure they do not knowingly work with the IRGC, a difficult task given the opaque nature of the Iranian economy.



251 H Street, NW
Washington, DC 20001

T 202-639-5200
F 202-639-0630

www.aipac.org