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Who is Khamenei’s Dispenser?

A quick look at the upcoming reinstatement of US sanctions

Iranian Lawyers Association (ILA)
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Following Mr. Trump’s announcement on May 8, 2018, of the US exit from the Joint Comprehensive Plan of Action (JCPOA, aka Iran nuclear deal), the US OFAC issued a statement and a Wind-down FAQ portraying the upcoming reinstatement of certain US sanctions. These documents are merely expository and general, and hence lack legal effects or legal details; however, they are important because they delineate the OFAC’s preparatory plans for the reinstatement of sanction after the next 90 days and 180 days.

The highlights of the sanctions that would be imposed are as follows:

AFTER 90 DAYS (i.e. at the end of August 6, 2018), the following sanction will be reinstated:

The First Group (Reinstatement of certain sanctions which were previously lifted under JCPOA):

- 1) Sanctions on the purchase or acquisition of U.S. dollar banknotes by the Government of Iran;
- 2) Sanctions on Iran’s trade in gold or precious metals;
- 3) Sanctions on the direct or indirect sale, supply, or transfer to or from Iran of graphite, raw, or semi-finished metals such as aluminum and steel, coal, and software for integrating industrial processes;
- 4) Sanctions on significant transactions related to the purchase or sale of Iranian Rials, or the maintenance of significant funds or accounts outside the territory of Iran denominated in the Iranian Rial;
- 5) Sanctions on the purchase, subscription to, or facilitation of the issuance of Iranian sovereign debt;
- 6) Sanctions on Iran’s automotive sector.

The Second Group (Revocation of the following JCPOA-related authorizations under US primary sanctions):

- 1) The importation into the United States of Iranian-origin carpets and foodstuffs and certain related financial transactions pursuant to general licenses under the Iranian Transactions and Sanctions Regulations, 31 C.F.R. part 560 (ITSR);

- 2) Activities undertaken pursuant to specific licenses issued in connection with the *Statement of Licensing Policy for Activities Related to the Export or Re-export to Iran of Commercial Passenger Aircraft and Related Parts and Services* (JCPOA SLP);
- 3) Activities undertaken pursuant to General License I relating to contingent contracts for activities eligible for authorization under the JCPOA SLP.

AFTER 180 DAYS (i.e. at the end of November 4, 2018), the following sanction will be added:

- 1) Sanctions on Iran's port operators, and shipping and shipbuilding sectors, including on the Islamic Republic of Iran Shipping Lines (IRISL), South Shipping Line Iran, or their affiliates;
- 2) Sanctions on petroleum-related transactions with, among others, the National Iranian Oil Company (NIOC), Naftiran Intertrade Company (NICO), and National Iranian Tanker Company (NITC), including the purchase of petroleum, petroleum products, or petrochemical products from Iran;
- 3) Sanctions on transactions by foreign financial institutions with the Central Bank of Iran and designated Iranian financial institutions under Section 1245 of the National Defense Authorization Act for Fiscal Year 2012 (NDAA);
- 4) Sanctions on the provision of specialized financial messaging services to the Central Bank of Iran and Iranian financial institutions described in Section 104(c)(2)(E)(ii) of the Comprehensive Iran Sanctions and Divestment Act of 2010 (CISADA);
- 5) Sanctions on the provision of underwriting services, insurance, or reinsurance;
- 6) Sanctions on Iran's energy sector [in general].

It should be added to the above that a long list of previously sanctioned physical and juridical entities is to be returned (and possibly updated) for sanctions. Moreover, sanctions under the presidential decrees 13574, 13590, 13622, 13628, 13645, etc., will be reinstated which *per se* have long stories.

Those who are familiar, to a minimum extent, with trade and financial relations and regulations in transnational and international laws, are well aware that the weak and failing Islamic regime would be shattered under sanctions, within a two-year period, given the present situation of the regime, the economic and political weight of the US even during the era of an unconventional administration such as Trump's, the intrinsic indignity of the Islamic regime of Iran in the international arena, and other relevant considerations, despite the oppositions by certain Western countries and opportunism of Russia and China in milking a cow like Khamenei's regime.

Given the above picture, we should find out which dispensary supplies Mr. Khamenei's narcotics that has caused him to launch his wrong nuclear weapons program, subsequently succumb under pressures before signing the JCPOA and bow disgracefully (or as he baselessly termed it "heroic softness"), and then expand his adventurous measures in the region which has resulted in extensive war crimes in Syria and elsewhere in defiance of international demands. He has proved to be too coward to take responsibilities for his decisions and actions. More than ever, he is idiotically imposing hefty costs to the Iranian people. He has driven Iran to the brink of total failure, and is now, desperately and with his usual stubbornness (which is a typical feature of an ignorant person having the illusion of knowing), biting others and chanting "Trump can't do a damn thing".

Mr. Khamenei! The Iranian people have seen your regime's inside factions, even the so-called reformists, moderates and fake oppositions unmasked. We are particularly recounting this from the sources inside the IRGC and the Intelligence Ministry, and you perfectly know how true and sensitive this point is. You know that, in the upcoming unrest and uprisings, nobody will stand by you this time except for very few retarded fanatics and mercenaries. Therefore, stop vilifying and insulting others at the expense of annihilating our country Iran. Pull up your witch craft and relinquish the reign, or face the destiny of some other dictators who were pulled out of sewage by their people or dragged out of their foxholes. We attract your attention to the Bahman (February) issue of the Intelligence Ministry's bulletin which you have already received.

A review of the scenarios and the consequences of launching various military engagements with "certain Western countries" which has already been given to you through joint reports of the Quds Force and IRGC's Intelligence clearly illustrate that your childish fireworks will not yield tangibly beneficial and reliable results. Maybe the only solution for you is to have recourse to your master and father, Vladimir Putin, to use his influence on a part of the US administration to mitigate the pressure on you to some extent for a short period of time. But do not forget to pat all the real Iranians, including the Iranian Lawyers, on the shoulder for their insights, albeit when the effects of the sanctions emerge gradually, Russia sells you in a bargain with the West, Putin's rotten rope from which you are hanging is torn and you are falling down the hell.

Iranian Lawyers Association

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