



Security Council

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Letter dated 24 June 2019 from the Chargé d'affaires a.i. of the United States Mission to the United Nations addressed to the Secretary-General

The United States wishes to bring to the attention of the Security Council its concerns regarding the implementation and maintenance of the restrictive measures outlined in Council resolution [2231 \(2015\)](#). Specifically, we would like to call attention to: (a) the Council's failure to maintain current information for entities and individuals listed in the attachment to annex B to the resolution; (b) regular asset freeze violations by Member State companies doing business with designated entities; and (c) a continuing pattern of travel ban violations, most notably involving Islamic Revolutionary Guard Corps Qods Force Commander General Qasem Soleimani.

The list established and maintained by the Security Council relating to Council resolution [2231 \(2015\)](#) includes 84 designated individuals and entities known to have engaged in, associated directly with or provided support to Iran's proliferation-sensitive nuclear activities which remain subject to restrictive measures of the United Nations. According to paragraph 6 (c) of annex B, all States are required to freeze, until October 2023, the funds, other financial assets and economic resources that are owned or controlled by the individuals and entities that were specified on the list established and maintained by the Committee established pursuant to Council resolution [1737 \(2006\)](#) as of the date of adoption of resolution [2231 \(2015\)](#), with the exception of the 36 individuals and entities specified in the attachment to annex B to resolution [2231 \(2015\)](#) or any others that may be delisted by the Council, and also freeze those of any others that the Council may designate pursuant to paragraph 6 (c). States are similarly required, until October 2020, pursuant to paragraph 6 (e) of annex B, to take the necessary measures to prevent the entry into or transit through their territories of individuals described in paragraph 6 (c), with the exception of their own nationals, unless the Council approves an exemption to this restriction in advance, on a case-by-case basis.

The full implementation of these asset freeze and travel ban measures requires continuous attention to the details of the designations list, ensuring that its information is both current and sufficient to facilitate implementation by Member States. Yet the Security Council has not updated the list in more than nine years. Moreover, the Council has thus far provided identifier information, such as location, contact information and aliases, for only 18 of the 84 entities and individuals subject to the asset freeze and travel ban under Council resolution [2231 \(2015\)](#). We note, for instance, that Pars Aviation Services Company, bearing the reference IRe.051, is currently doing business under the name Pouya Air, using the International Civil Aviation Organization designator PYA. Yet the Council has not updated this



designation to ensure that States Members of the United Nations implement the restrictions of Council resolution 2231 (2015) under the entity's current name. We are prepared to present additional updated identifier information to the Council in order to update resolution 2231 (2015).

The lax implementation of the asset freeze is similarly revealed by the fact that Islamic Revolutionary Guard Corps-associated entities subject to the asset freeze and travel ban under Security Council resolution 2231 (2015) continue to conduct business and facilitate procurements with third countries. For instance, we call your attention to Oriental Oil Kish, designated IRe.049, for being owned, controlled by or acting on behalf of an Islamic Revolutionary Guard Corps-owned construction company involved in the construction of the Qom uranium enrichment facility, which currently operates in or is affiliated with two trading companies operating in another State Member of the United Nations. We are prepared to present the evidence for these violations to the Council, and we urge the Secretary-General to direct their inspection and inclusion in his subsequent report on the implementation of Council resolution 2231 (2015).

Mounting evidence illustrates as well that violations of the travel ban imposed in annex B, paragraph 6 (e), have become common in the absence of firm oversight from the Security Council, particularly as regards the continuing travel of Islamic Revolutionary Guard Corps Qods Force Commander General Qasem Soleimani. Regional media continue to report regularly on General Soleimani's travel to Iraq and other States Members of the United Nations. In December 2018, *Islamic World News* published a photograph of Soleimani meeting in Iraq with Sunni Mufti Sheikh Mahdi al-Sumayda'i. In August, one of Iran's own news outlets, Tasnim News Agency, which has direct links to the Islamic Revolutionary Guard Corps, published pictures of Soleimani visiting the Shrine of Imam Ali in Najaf, Iraq. And in July, Hezbollah Secretary-General Hassan Nasrallah tweeted a picture of himself with Soleimani in Lebanon. We are prepared to present a fulsome list of these reports and accompanying photographic evidence directly to the Secretariat for its next report.

The lax implementation of the restrictive measures outlined in annex B to Security Council resolution 2231 (2015) and the continued failure by the Council to update the list of individuals and entities subject to these restrictive measures are cause for serious concern and require immediate corrective attention. To that end, we request a meeting of the Council in the resolution 2231 (2015) format in the coming weeks to address updating of the identifier information of listed entities and individuals, as well as how to ensure that Member States consistently implement the asset freeze and travel ban mandated in the resolution. It is our hope and conviction that the full implementation of these restrictive measures against individuals and entities with a demonstrated history of providing support to Iran's proliferation-sensitive nuclear activities is essential to securing regional peace and security in an already turbulent Middle East.

We request that the present document be circulated as a document of the Security Council.

(Signed) Jonathan R. Cohen
Ambassador