

What are the requirements of CAATSA section 105 related to the imposition of sanctions on the IRGC, and how are those requirements being implemented?

On August 2, 2017, the President signed into law the “Countering America’s Adversaries Through Sanctions Act” (Public Law 115-44) (CAATSA), which, among other things, imposes new sanctions on Iran. Section 105 of CAATSA requires the imposition of sanctions applicable pursuant to the global terrorism Executive Order 13224 (E.O. 13224) on Iran’s Islamic Revolutionary Guard Corps (IRGC) and foreign persons that are officials, agents, or affiliates of the IRGC. Consistent with that requirement of CAATSA, OFAC designated the IRGC on October 13, 2017, pursuant to E.O. 13244 for providing support to the IRGC-Qods Force, which previously had been designated for its support to various terrorist groups. OFAC intends to implement the remaining requirements of section 105 with respect to foreign persons that are officials, agents, or affiliates of the IRGC when the authority under section 105 of CAATSA becomes effective on October 31, 2017. [10/13/2017]

Isn’t the IRGC already subject to sanctions? What’s different about this action?

Yes. The IRGC is also blocked under Executive Orders 13382 (relating to WMD proliferation), 13553 (Iranian human rights abuses), and 13606 (Iranian and Syrian human rights abuses via information technology), and persons who engage in certain activity involving the IRGC may be subject to secondary sanctions. Today’s action designating the IRGC under E.O. 13224, our counterterrorism authority, carries some additional consequences that will limit certain activities with respect to the IRGC. Persons designated under E.O. 13224, which now includes the IRGC, may not avail themselves of the so called “Berman exemptions” under the International Emergency Economic Powers Act (IEEPA) relating to personal communication, humanitarian donations, information or informational materials, and travel. [10/13/2017]

Is the IRGC now a Foreign Terrorist Organization (FTO)?

No. The Department of State has not designated the IRGC as an FTO. [10/13/2017]