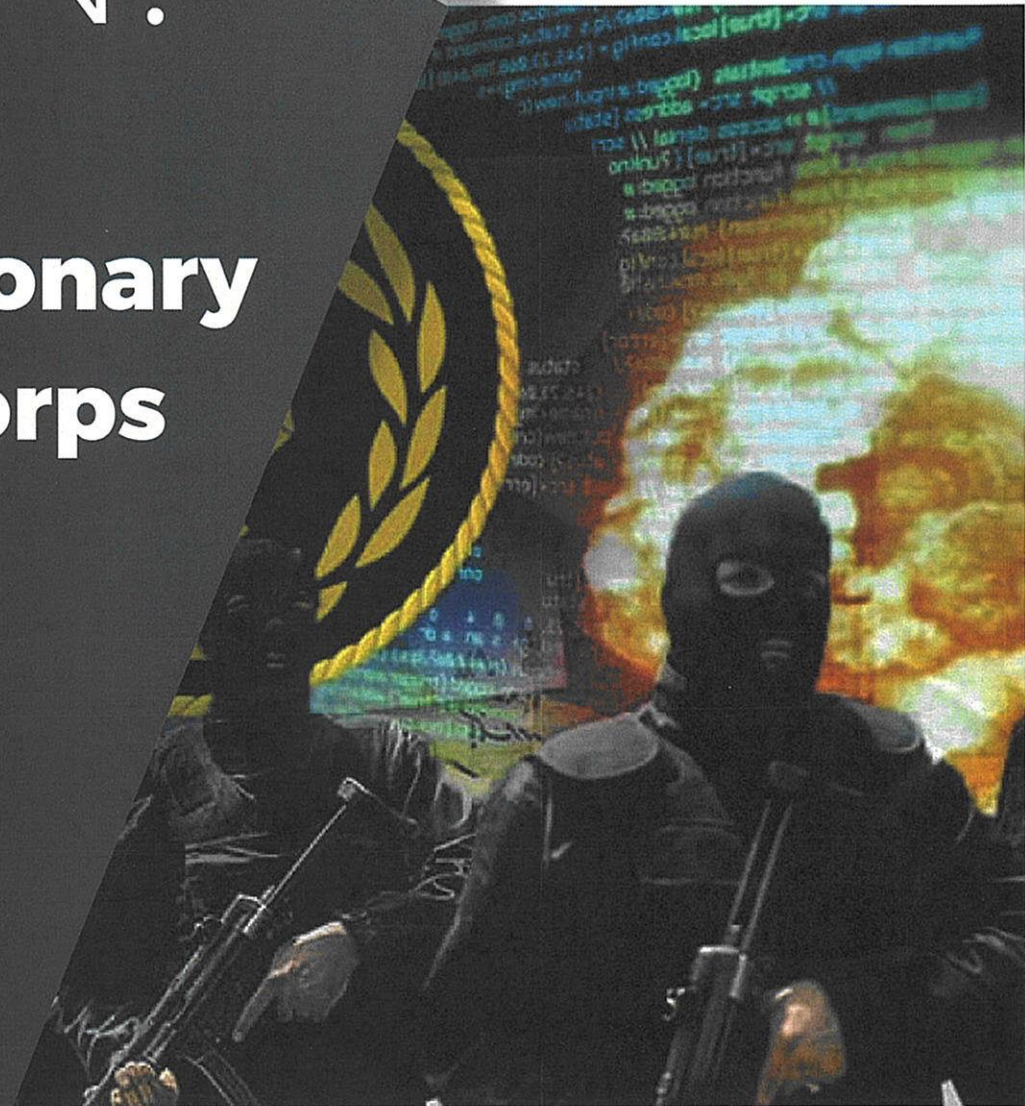


JUL 1 3 2022

**Why Tehran Wants  
the IRGC  
Off U.S. Terror List**

# IRAN: Islamic Revolutionary Guard Corps (IRGC)

The  
Machinery  
of  
Terrorism



Published by  
**The National Council of Resistance of Iran**  
U.S. Representative Office  
March 14, 2022



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# 1. Introduction

In the ongoing nuclear negotiations in Vienna, the Iranian regime has insisted on removing the Islamic Revolutionary Guard Corps (IRGC) from the United States' list of Foreign Terrorist Organizations (FTO). The four-decade-long involvement of the IRGC and its extraterritorial arm, the Quds Force (IRGC-QF), in terrorist operations ultimately led to their designation as an FTO in April 2019.

The IRGC was first added to the Specially Designated Nationals and Blocked Persons List (SDN List), in December 2007, for supporting Tehran's effort to secure weapons of mass destruction. Additional sanctions designations followed under separate legal authorities for the IRGC's human rights abuses and acts of terrorism and, in October 2017, the U.S. government designated the IRGC as a Specially Designated Global Terrorist (SDGT). This SDGT designation was imposed under Section 105 of the Countering America's Adversaries Through Sanctions Act of 2017 (CAATSA), which required the U.S. Treasury Department's Office of Foreign Assets Control (OFAC) to extend terrorism-related sanctions under Executive Order 13224 to "foreign persons that are officials, agents or affiliates of the IRGC."

Since 1979, the use of institutionalized terrorism as a tool of statecraft has been

a pillar of the clerical regime's survival strategy. From using the Hezbollah in Lebanon to bomb the U.S. Marine Barracks in 1983, the Khobar Towers bombing in Saudi Arabia in 1996, the Jewish Community Center bombing in Argentina in 1994, using drones to target the Saudi-Aramco refinery in 2019, the downing of a Ukrainian Passenger flight in 2020, to name a few, the IRGC's role in direct or by-proxy state-sponsored terrorism is well documented. In many of the above examples, a common thread is the role of proxy groups recruited, funded, trained, and dispatched by the IRGC and its Quds Force. IRGC is the heart of the development of technology in nuclear, ballistic missiles, drones, and the training of proxy forces in the region.

The FTO designation has handicapped many of the IRGC-related foreign financial transactions. That is why Tehran has reportedly made IRGC's exclusion from the FTO list one of its main demands in the Vienna talks; the designation has been effective. It could have been even more effective if it was augmented by other punitive measures and sanctions.

The IRGC's involvement in research & development of weapons of mass destruction, ceaseless terrorist activities to

foment mayhem, destruction, and instability across the Middle East, its financial empire to fund its nefarious activities inside Iran and abroad, make this terror outfit a serious global threat. Stopping this threat without clipping the terrorism wings of the IRGC will not be very effective. If money flows into the IRGC unhindered, it will end up in the hands of Hezbollah, Yemeni's Houthis, Iraqi Shiite militias, and other proxies.

The IRGC's other main function is to serve as the regime's main arm of crushing internal dissent and to suppress the Iranian people as well as engineering assassination of Iranian dissidents abroad. Suppression at home and terrorism abroad are the two sides of the same IRGC coin and the foundations of the regime's survival.

It is useful to recall the list of various terrorism, human rights, nuclear, and missile development-related sanctions the IRGC is currently subjected to. The partial list below comes from the Office of Foreign Asset Control of the United State:

- ▶ IRGC
- ▶ IRGC AEROSPACE FORCE
- ▶ IRGC AIR FORCE AL-GHADIR MISSILE COMMAND

- ▶ IRGC COOPERATIVE FOUNDATION
- ▶ IRGC GROUND FORCES
- ▶ IRGC JANGAL ORGANIZATION
- ▶ IRGC MISSILE COMMAND
- ▶ IRGC NAVY
- ▶ IRGC-QF
- ▶ ISLAMIC REVOLUTIONARY GUARD CORPS(IRGC)-QUDS FORCE

The point to notice is the variety of militarily and financial involvement of the IRGC in Tehran's rogue behavior. All aspects of military and financial institutions in the form of foundations and civilian entities are part of the IRGC's vast network to fund its terrorist activities and plunder Iranian people's national wealth.

In addition to the organizations, there are many individuals and "civilian" entities which do the bidding for the IRGC's malign activities. A potential IRGC exclusion from the FTO list and the taking these individuals off the terror blacklist, as requested by Iran's ruling theocracy, will no doubt heighten terrorism and mayhem in the region.

This report will show different aspects of IRGC's systemic involvement in terrorism and will highlight how it has continued since 2019.

## 2. IRGC: A History of Terrorism

### a. The IRGC and its Tasks

Article 151 of the Iranian regime's Constitution specifies the duties of the Islamic Revolutionary Guard Corps (IRGC) as "protecting the Revolution and its accomplishments." To put it another way, the IRGC is the backbone of the apparatus established to preserve the dictatorship, which itself rests on three pillars: suppression within Iran; export of terrorism and fundamentalism beyond Iran's borders; the program to manufacture a nuclear bomb and nuclear-capable missiles to threaten other countries.

The Revolutionary Guards is involved in military and terrorist interference in several countries of the region. Within the borders of Iran's neighbors, extensive terrorist operations and military meddling are carried out simultaneously. The IRGC also organizes terrorist networks and conducts terrorist operations throughout the world.

The IRGC has created a large directorate within its extraterritorial arm, the Quds Force, to expand its training of foreign mercenaries as part of the strategy to step up its meddling abroad in Syria, Iraq, Yemen, Bahrain, Afghanistan, and elsewhere. The directorate has dozens of training camps across Iran. The

camps have been assigned based on the nationality of the trainees and the type of training. Both terrorist training and military training for militias are provided, enabling them to better infiltrate and advance the regime's regional objectives. They are then dispatched to countries where the regime is engaged in wars, to escalate the warmongering.

The training directorate of the Quds Force is one of the most important sections of this terrorist force. The directorate is codenamed 12,000 in the internal correspondence of the IRGC. The headquarters of the directorate is in Imam Ali Garrison 20km from the Tehran-Karaj Highway.

Nuclear negotiations happening in Vienna are a "sequel" to what has already transpired in 2015 when the first version of JCPOA was agreed upon. We already know how the regime made use of "sanction relief" from the first set of agreements. The tens of billions of dollars and other resources provided to the Iranian regime following the JCPOA did not alter the rogue behavior of the regime, nor did it improve the economic situation of the population. On the contrary, the terror abroad intensified, as did the suppression of the Iranian people.

The mullahs' regime has funneled billions of dollars to finance its belligerent agenda in the Middle East while the majority of Iran's people are living in poverty. As the regime's officials have conceded, if the regime fails to ignite wars outside Iran's borders, it would have to fight for survival within Iran's borders.

Tehran is setting up the necessary facilities and equipment for missile development and launch capabilities. In addition to firing missiles into regional countries, it exports the necessary missile technology and constructs missile factories outside Iran's borders to supply its proxies. This export of missiles to Yemen and elsewhere contravenes UN Security Council resolutions.

#### **b. IRGC in Yemen**

IRGC uses an existing conflict to spread terror and instability by supporting the warring parties. IRGC-QF support for the Ansarullah proxy group in Yemen, known as the Houthis is widely reported. But the involvement in Yemen has also brought about a wider terror capability, drones, and naval attack units.

#### **c. IRGC in Syria**

The Syrian war provided the basis for the regime to spread its warmongering and meddling in the region. The regime spent over 15 billion dollars annually at the height of the Syrian conflict. The total is estimated at more than 100 billion dollars.

Thousands of foreign forces including the Islamic Revolutionary Guard Corps, Afghan

Fatemiyou, the Pakistani Zeynabiyou, various Iraqi militia groups, the Lebanese Hezbollah took part in the war in Syria under the IRGC. More than 100 senior IRGC commanders ranked higher than colonel have been killed in Syria.

#### **d. IRGC in Iraq**

The destructive influence in Iraq and elsewhere is evident. The IRGC and the IRGC-QF played a key role since 2003 in dominating the affairs in Iraq by recruiting, training, funding militias in Iraq. The Quds Force has been involved with the production and utilization of the Explosively Formed Projectiles (EFP) targeting Americans and Iraqis, taking tens of thousands of lives. The IRGC not only meddles in the internal affairs of the country and rejects the will of people but it has participated in terror and assassination inside Iraq, even murdering Iranian regime's critics.

#### **e. IRGC and Hezbollah**

IRGC's relationship with Hezbollah is deep and old. In Lebanon, the destructive nature of Hezbollah in Lebanese civil society is now obvious. Hassan Nasrallah has bragged that as long as the Iranian regime has money, so will they. So, the IRGC money gets spread among "friends." The IRGC has further extended its reach beyond the immediate Middle East and the Islamic countries to South and Central America through its proxy groups like Hezbollah. A combined effort of narco-terrorism for financial reasons in addition to the traditional terrorism describes its push into the Americas.

The regime's network of terrorism and mafia gangs in South American countries have emerged as a result of decades of corruption and underdevelopment in those countries. In recent years, the IRGC and its

proxy terrorist group, Hezbollah, have been able to circumvent international sanctions and earn hard currency by strengthening their foothold in Latin America.

# 3. Continued Terrorism Since the 2019 FTO Designation

It is noteworthy to examine the continued and the new terror initiatives by the IRGC since its Foreign Terrorist Organizations (FTO) designation in 2019. The IRGC terror activities have stepped up unabated. The mullahs have openly increased their aggression and terrorism in Syria, Yemen, Iraq, and Lebanon. The IRGC took responsibility for firing a dozen ballistic missiles from Iran into Erbil on March 13, 2022.

## a. IRGC's Formation of Proxy Naval Terror Units

The Islamic Revolutionary Guard Corps' Quds Force (IRGC-QF) has been recruiting mercenaries for newly created, armed, and trained terrorist units to attack ships and maritime targets in the region. Naval attacks directly and indirectly by the IRGC have increased since 2019.

After the elimination of Qassem Soleimani in January 2020, which weakened the Quds Force's ability to directly encroach in the countries of the region, the IRGC's capacity to intrude in Iraq, Lebanon and Syria has been on the decline. To compensate for this failure, the IRGC has turned to intervention in Yemen, especially escalating naval terrorist activities and threatening the international shipping on its shores.

The command headquarters of the Quds Force in Yemen recruits Houthi forces and

sends them to Iran for training, where the IRGC-QF conducts training in specialized naval courses for its Yemeni, Iraqi, Syrian, Lebanese, and African mercenaries, who are then dispatched to their home countries to form proxy naval units.

The primary location for naval commando training for these proxy naval units is called the Khamenei Academy of Naval Sciences and Technology in Ziba Kenar on the Caspian coastline. There is a section in the Khamenei Academy dedicated to the six-month training course of foreign mercenaries affiliated with the Quds Force. In January 2020, for example, one such course in naval science and technology was launched for about 200 Yemeni mercenaries.

Several Persian Gulf islands are being used for maritime training for IRGC-QF mercenaries, including Farur and Qeshm islands.

The Quds Force has set up a smuggling network to provide weapons and equipment to its proxies for naval attacks. The Quds Force has equipped the Houthis with speedboats, missiles, mines, and other weapons. It employs tactics that utilize speedboats and asymmetric warfare to expand conflicts into the Arabian Sea, Bab al-Mandab, and the Red Sea. Many terrorist operations in this region targeting ships have been carried out by these proxy naval units.

Since early 2021, and more so since August 2021, when Ebrahim Raisi took office as the new president of the Iranian regime, Tehran has stepped up its maritime terrorist operations using its foreign mercenaries, especially the Houthis. This escalation is in line with its stepped-up drone attacks against the Persian Gulf countries, as well as its nuclear defiance.

### **b. IRGC's Drone Terror**

In that the clerical regime in Iran lacks the military capability to build advanced weaponry, it has resorted to the production of weapons and equipment that can be used for terrorist and war-mongering activities.

One such weapon, in the production and export of which the regime has invested heavily in recent years, is a variety of drones, or unmanned aerial vehicles (UAVs). The IRGC smuggles these UAVs abroad for its proxies to ignite war and terrorism. Prominent Examples of drone attacks are the 2021 drone attacks into the Saudi-Aramco refinery and the 2021 Drones attacks into Cargo ships resulting in 2 fatalities.

The UAV Command under the IRGC Aerospace Force has various UAV centers across Iran. It is the most important entity for training and using UAVs. Local mercenaries from these countries receive training at IRGC Aerospace Force locations in Iran.

The Quds Force Intelligence and Training directorates have dedicated certain sections to the production as well as training and export of UAVs to other countries in the region.

The IRGC's drone command center was directly involved in the attack on the Saudi Aramco oil refinery. The IRGC also continues to export drones to Syria, Iraq, Lebanon, and Yemen. UAV parts are flown to these countries in IRGC planes as well as shipped through the land crossing and are subsequently assembled in the host countries.

The findings make clear that the reason for the IRGC's focus on the production and use of drones lies in the fundamental military weaknesses of the regime when it comes to modern warfare. On the other hand, the IRGC has used drones, much like its missile program, as an instrument to instigate conflict and terrorism in the region in order to keep the clerical dictatorship in power.

### **c. IRGC's Terror and Assassination Attempts on US soil**

The commander of the Quds Force, Esmail Qaani, has openly been threatening the US officials with violence. The Washington Examiner on March 7, 2022, reported that at least two Iranian members of the IRGC's Quds Force were plotting to assassinate former national security advisor John Bolton. According to the Examiner's Justice Department sources, the FBI agents and the intelligence officers disrupted the assassination plot against Bolton. In 2011 Treasury Department sanctioned 5 IRGC-Quds Force individuals connected to assassination attempts on the Saudi Arabian Ambassador to the U.S.

# 4. Funding Terrorism

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Where does all the money come from? The IRGC is not just a military organization. It also has an extensive financial arm. It has the resources of a relatively wealthy country like Iran at its disposal. The entire Iranian economy is largely controlled one way or another by Ali Khamenei and the IRGC. IRGC's financial empire is the lifeblood of IRGC. Any money that goes into this regime is swallowed by this financial monster.

The Iran nuclear deal, finalized in July 2015 between the P5+1 world powers and Tehran, encouraged some in the West that the Iranian economy would finally turn a corner and be set on a path of gradual progress. Its implementation since January 2016, which brought the lifting of some international sanctions, strengthened these hopes, and Western companies initially expressed eagerness to ink deals with Tehran. That optimism never materialized, because international sanctions were never the cause of Iran's economic ills.

Economic development constantly coalescing with the pillars of political power, hides the origins of the current crisis, only heightened — not produced — by international sanctions.

Article 44 constitutionally splits the entire economy into three sectors: "state,

cooperative, and private." The regime is granted legal justification to seize property by claiming adherence to "Islamic law," protection of "public interests," and "social justice." Article 49, for example, grants the regime "the responsibility of confiscating all wealth" that the state considers being obtained through illegitimate means. As such, regime officials are unleashed in their large-scale and lucrative confiscation campaigns.

## a. IRGC Dominates Iran's Economy

Over the past decade, this has been billed as "privatization," and is how a significant portion of Iran's economic institutions have been handed off to the office of the Supreme Leader as well as the IRGC and its affiliate entities.

The beneficiaries of the bulk of these transfers were the Supreme Leader's office and its various tentacles, including the dominant SETAD, the armed services, and the infamous bonyads or foundations.

The consequent economic configuration is defined by at least 14 major economic powerhouses either directly or indirectly controlled by Khamenei, the IRGC, or a combination of their affiliates.

When it comes to banks, financial and credit institutions, insurance, the stock market, domestic and foreign commerce, real estate, and the financial instruments market, Khamenei's office (along with the IRGC) has taken control of virtually everything that matters. This has been done through the so-called cooperatives (ta'avoni), some of the most important of which are among the 14 economic blocks.

These three policies, namely seizure of public property creating economic powerhouses, near-absolute control over financial markets, and elimination of subsidies, are all means to a single end: the wholesale and sweeping confiscation of public wealth and assets for the benefit of Khamenei and the IRGC.

But where do the astronomical profits go? The money ends up funding the IRGC mercenaries and its terror operations in Syria, terrorism and sectarianism in Iraq, the war in Yemen, the nuclear weapons and missile programs, the security apparatus in Iran, and terrorist operations around the world.

Foreign investors cannot in practical terms avoid entanglement by affiliation in the Iranian regime's support for terrorism, continued aggressive policies towards regional countries, manufacture, and testing of ballistic missiles, and egregious human rights violations inside Iran.

In reality, the back-breaking control of the Supreme Leader and the IRGC, over the economic system and the astonishing growth of extremely disruptive and

obstructive rules and regulations leaves little or no room for genuine free-market competition in Iran.

Western companies engaged in economic and financial deals with Iran would like to portray their activities as transactions with the "private sector." However, behind the official banks and companies lies a web of institutions controlled by the theocracy, and specifically the IRGC.

Western companies, governments, and the citizens they represent cannot avoid the reality that today the gatekeepers to Iran's economy are those who suppress the Iranian population and export the very terrorism and fundamentalist ideology that threaten the West.

There are important conclusions here. First, the vast and interconnected network of wealth and power in the hands of the Supreme Leader is indicative of a sophisticated monopoly over the Iranian economy. Put simply, to do business with Iran is to do business with Khamenei and the IRGC.

Second, the disastrous economic situation — unemployment, inflation, near-destruction of the manufacturing sector, wide-scale corruption, stagnant wages, is the most enduring long-term source for social discontent. It is a major source of instability for the regime at home, casting a long shadow of uncertainty over its future. Since December 2017, there have been 8 major uprisings in Iran, some engulfing 200

cities and all 31 provinces, shaking the very foundation of the clerical regime, as people have been chanting “Death to the dictator; Death to Khamenei” and “Our enemy is right here, they lie when they say it is America.”

Sanctions relief will not change these deeply entrenched factors. As social demands grow in breadth and depth, the regime’s ability to respond to them becomes increasingly limited. That presents a recipe for a major social transformation, one that sees no future role for Tehran’s theocratic rulers.

#### **b. IRGC’s Official Budget Grows by 240%**

You would think that the regime would cut the IRGC budget when the economy is not going well, and the regime cannot even pay for the wages of the teachers, and workers. But on the contrary, in Raisi’s budget, there was a 240% increase in the IRGC budget for the Iranian fiscal year starting March 2022.

# 5. Waging Terror on the Iranian People

## a. IRGC Protects, Keeps Theocracy in Power

IRGC was initially formed to protect the clerical regime and its fundamentalist ideology, serving directly the Vali-Faghih (Ali Khamenei). It is the instrument used by Ali Khamenei to suppress the population. Over time it has also become the sole military/financial powerhouse in Iran.

They are not just another center of power in Iran, they are the military arm to keep Supreme Leader Ali Khamenei in power with unlimited authority in the regime.

## b. IRGC Suppresses the Iranian People

IRGC is brought in to suppress the protests when they cannot be handled by the regular security forces. This happened in November of 2019 when people protested the gasoline price increase across Iran. More than 1,500 people were reported killed in these protests. Many of the IRGC officers were directly sanctioned for participating in killing the protesters. The money that flows in will ultimately be used to suppress the Iranian people, in addition to funding terrorism.

## 6. Conclusion

1. The Islamic Revolutionary Guard Corps (IRGC), and its extraterritorial arm, the Quds Force (IRGC-QF) continue to sponsor and fund terrorism. The fiscal year (starting March 2022) shows a 240% increase in the budget allocated to the IRGC. This is in addition to special funds directly controlled by the Supreme Leader Ali Khamenei, which would help fund terrorism by the IRGC-QF.
2. IRGC-QF has stepped up its terror operations in the region, especially after the 2018 uprisings in Iran, to make up for its lack of popular support, and in order to project power and cover its fundamental weakness inside Iran.
3. Since the 2019 designation of the IRGC and the IRGC-QF as a Foreign Terrorist Organization (FTO), the stepped-up terror operations have proven that the well-warranted designations need to remain in place.
4. The IRGC smuggles UAVs abroad for its proxies to ignite war and terrorism. The UAV Command under the IRGC Aerospace Force has various UAV centers across Iran, used for training and utilization of the UAVs. The IRGC has used drones, much like its missile program, as an instrument to instigate terrorism to keep theocracy in power.
5. The IRGC-QF has been recruiting mercenaries for newly created, armed, and trained terrorist units to attack ships and maritime targets in the region. Naval terrorist attacks directly and indirectly by the IRGC have increased since 2019.
6. The Quds Force has set up a smuggling network to provide weapons and has equipped the Houthis with speedboats, missiles, and mines to expand conflicts into the Arabian Sea, Bab al-Mandab, and the Red Sea. Many terrorist operations in this region targeting foreign and Arab ships have been carried out by these proxy naval units.
7. In 2021, and more so since Ebrahim Raisi took office as president, Tehran has stepped up its maritime terrorist operations using its foreign mercenaries, especially the Houthis.
8. Tehran has recently stepped-up terror plots on U.S. soil. The commander of the IRGC's Quds Force, Esmail Qaani, has openly threatened the US officials with violence. According to a Justice

- Department official at least two Iranians belonging to the IRGC-QF have been plotting to assassinate former national security adviser John Bolton.
9. The continued offers of concessions by Western countries and lack of accountability for the regime's terrorism, have emboldened Tehran to step up its terrorism in the region.
  10. Since 2018, there have been eight major uprisings, as well as successive protests by various sectors of Iranian society seeking fundamental change. Yet, the Iranian regime has been investing lavish amounts of money and resources for training, funding, and arming proxies, while a vast majority of the Iranian people live below the poverty line.
  11. Tehran's repeated demands during the Vienna talks for lifting sanctions on the IRGC, Supreme Leader Khamenei, and other officials involved in decades of terrorism, aims to provide additional resources to these entities for funding terrorism in the region.
  12. The vast monopoly of the Supreme Leader and the IRGC over the Iranian economy, means doing business with Iran is doing business with Khamenei and the IRGC.
  13. The disastrous economic situation – unemployment, inflation, near-destruction of the manufacturing sector, wide-scale corruption, stagnant wages, are not going to be resolved by sanctions relief. On the contrary, the empowered IRGC would exert more pressure on the population and suppress them more, while funding terror proxies.
  14. Removing the terrorism designation (FTO) of the IRGC, as demanded by the Iranian regime, would send a wrong signal to the regime, as well as its victim. Instead of holding the regime accountable for its stepped-up terrorism, once again, the West would be rewarding the regime for its terrorism, leading to even more violence.
  15. Given the behavior of the Iranian regime which heavily relies on the IRGC to carry out terrorism in the countries of the region, none of the sanctions against the regime should be lifted. On The contrary, additional sanctions are particularly warranted for the regime's escalation of violence and terrorism in the region.

# About NCRI-US

The National Council of Resistance of Iran-US Representative Office (NCRI-US) acts as the Washington office for Iran's parliament-in-exile, the National Council of Resistance of Iran, which is dedicated to the establishment of a democratic, secular, non-nuclear republic in Iran.

16 NCRI-US, registered as a non-profit tax-exempt organization, has been instrumental in exposing the nuclear weapons program of Iran, including the sites in Natanz and Arak, the biological and chemical weapons program, as well as the ambitious ballistic missile and drone programs.

NCRI-US has also exposed the terrorist network of the regime, including its

involvement in the bombing of the Khobar Towers in Saudi Arabia, the Jewish Community Center in Argentina, its fueling of sectarian violence in Iraq and Syria, and its malign activities in other parts of the Middle East.

With the information gathered by the MEK intelligence network inside Iran, NCRI-US has also revealed crucial information about the vast financial empire run by the IRGC and Khamenei.

Our office has provided information on human rights violations, extensive anti-government demonstrations, and the movement for democratic change in Iran.

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- ◆ The Islamic Revolutionary Guard Corps (IRGC), and its extraterritorial arm, the Quds Force (IRGC-QF) have stepped up terror operations in the region, especially after the 2018 uprisings in Iran, in order to project power and cover the regime's fundamental weakness inside Iran.
- ◆ Since the 2019 designation of the IRGC and the IRGC-QF as a Foreign Terrorist Organization (FTO), the stepped-up terror operations have proven that the well-warranted designations need to remain in place.
- ◆ The IRGC smuggles UAVs abroad for its proxies to ignite war and uses drones, much like its missile program, as an instrument to instigate terrorism to keep theocracy in power.
- ◆ The IRGC-QF has been recruiting mercenaries for newly created, armed, and trained terrorist units to attack ships and maritime targets in the region. Since 2021, and more so since Ebrahim Raisi took office as president, Tehran has stepped up its maritime terrorist operations using mercenaries, especially the Houthis.
- ◆ Tehran has recently stepped-up terror plots on U.S. soil. The commander of the IRGC's Quds Force, Esmail Qaani, has openly threatened U.S. officials with violence.
- ◆ The continued offers of concessions by Western countries and lack of accountability for the regime's terrorism, have emboldened Tehran to step up terrorism.
- ◆ Tehran's repeated demands during the Vienna talks for lifting sanctions on the IRGC, Supreme Leader Khamenei, and other officials involved in decades of terrorism, aims to provide additional resources for funding terrorism in the region.
- ◆ The vast monopoly of the Supreme Leader and the IRGC over the Iranian economy, means doing business with Iran is doing business with Khamenei and the IRGC.
- ◆ Removing the terrorist designation (FTO) of the IRGC, as demanded by the Iranian regime, would be counterproductive, at best. Instead of holding the regime accountable for stepped-up terror, it would be rewarded for terrorism, leading to more violence.
- ◆ Given the behavior of the Iranian regime which heavily relies on the IRGC to carry out terrorism, no sanctions should be lifted. On The contrary, additional sanctions are warranted for the regime's escalation of violence and terrorism in the region.

