



# Unrest in Syria and U.S. Sanctions Against the Asad Regime

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## Summary

This report analyzes the current unrest in Syria and the U.S. response to the Syrian government's crackdown against demonstrators. It also provides background information on U.S. sanctions against the Asad regime and its supporters.

The confrontations and violence that swept through Syria in 2011 have escalated to the edge of civil war in early 2012. President Bashar al Asad and his family members refuse to leave power, despite internal demands and intense international pressure calling for political change and an end to violence against civilians. Instead, the regime has offered limited reforms and is meeting popular protests and armed opposition attacks with overwhelming force.

President Obama and his Administration have been calling for Asad's resignation since August 2011 and have been vocal advocates for United Nations Security Council action to facilitate his removal. However, with the council deadlocked and Russia and China showing no public willingness to endorse a military intervention in Syria, the Administration may be searching for new ways to accelerate Asad's departure.

Some Members of Congress and nongovernmental observers argue that the recent violence demonstrates the futility of expecting any substantive reform by Syrian authorities and suggests that U.S. policy should shift toward outright confrontation and embrace regime change as a policy goal. While the Administration has called for President Asad to step down, arguments in favor of regime change have been accompanied by wariness about what the implications of confrontation would be, and what the implications of regime change would be for regional security, particularly in light of the delicate sectarian balance in the Levant and a lack of established U.S. relationships with government and nongovernment actors in Syria. Other lawmakers have urged a gradual approach of increasing multilateral political condemnation and economic pressure against the Asad regime.

For now, the major question before concerned international actors is how to support Syria's opposition in a supportive manner that circumvents the United Nations Security Council veto of Russia and China, assuming both nations do not change their position on Syria. Even a recent Arab League-approved resolution continued to seek U.N. approval by calling on the Security Council to authorize a joint Arab-United Nations force to "supervise the execution of a cease-fire."

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## Toward a Syrian Civil War?

The confrontations and violence that swept through Syria in 2011 have escalated to the edge of civil war in early 2012. President Bashar al Asad and his family members refuse to leave power, despite internal demands and intense international pressure calling for political change and an end to violence against civilians. Instead, the regime has offered limited reforms and is meeting popular protests and armed opposition attacks with overwhelming force. Nonviolent resistance and protests continue, but their apparent futility has created frustration and anger within the opposition ranks. Press coverage and anecdotal reports suggest that thousands of mostly Sunni military soldiers (perhaps as many as 20,000 to 30,000) have defected or deserted rather than continue following orders to enforce the crackdown. Armed opposition fighters are becoming more lethal in their attacks on loyal state security forces and institutions, and some high-ranking officers are reported to have joined the opposition cause. The government accuses rebel fighters of bombings and assassinations targeting security infrastructure and personnel in and around the key cities of Damascus and Aleppo. As of mid-February, the number of defecting military personnel and armed opposition volunteers does not appear to have reached a decisive point, and fighting may continue to escalate toward a nationwide civil war.

As the Syrian conflict has intensified in early 2012, external actors have thus far failed in their attempts to end the bloodshed. An Arab League-sponsored monitoring mission inside Syria and transition plan put before the United Nations Security Council have both been obstructed by the Syrian government and opposed by permanent Security Council members Russia and China.<sup>1</sup> In early February, Russia and China vetoed a draft Security Council resolution that would have adopted an Arab League transition plan that calls for a transfer of power to Syria's vice president, followed by the establishment of a unity government and early elections. Prior to the vote, other Security Council members reportedly had agreed to remove punitive measures such as multilateral sanctions from the proposed resolution to sway Russia.<sup>2</sup> The measure ultimately failed, leaving members of the international community that are opposed to the Asad regime and seeking to provide assistance to the Syrian people without a U.N.-mandate for collective action.

In the meantime, the Syrian government appears to sense that it has a free hand to crush dissent: the military has unleashed a torrent of attacks against centers of opposition, most recently in Homs where the armed forces have shelled neighborhoods. Government forces also continue to besiege areas of Idlib, the east Damascus suburbs, and Homs. Reports suggest the government has deployed snipers, cut off water and electricity to civilian areas, and used heavy weapons such as tanks and artillery to bombard residential areas. In January 2012, the United Nations estimated that over 5,400 Syrians have been killed since the unrest began in March 2011. The actual figure

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<sup>1</sup> On December 26, 2011, 165 Arab League monitors arrived in Syria to verify Syria's compliance with an Arab peace plan. Killings continued. Syria opposition activists argued that the monitoring plan gave the regime cover. Monitors began to quit, and the Arab League suspended its mission and then formally ended it by mid-February.

<sup>2</sup> Russia did not veto the U.N. Resolutions that authorized military intervention in Libya, but its leaders have criticized what they feel was U.S. and European pursuit of a tacit policy of regime change under the guise of humanitarian intervention. Russia values Syrian support for Russia's only naval base in the Mediterranean region at the Syrian coastal town of Tartus. Russian arms sales to Syria are a strategic and lucrative component of the long-time partnership between Moscow and Damascus, which date to the Soviet era. From a diplomatic perspective, Russian leaders also may be reluctant to be seen as abandoning a close ally by supporting international intervention.

is probably much higher, and U.N. High Commissioner for Human Rights Navi Pillay has urged intervention while warning that a humanitarian crisis may be imminent.

The Asad family and the Alawite elite that supports it appear unwilling to peacefully abdicate power and may choose to fight on as long as their command of the military and intelligence apparatus allows. Defections continue among mostly Sunni Muslim soldiers and officers. The minority Alawite community has shown few signs of public discord, although some of its members have joined the opposition<sup>3</sup> and others may feel caught between the regime's demands for loyalty and their fears of the consequences of that loyalty in the event of regime change or civil war. Many foreign observers are debating the logic of Alawite loyalty in this context. Some analysts suggest that fear of the military-intelligence apparatus has kept the Alawite community politically quiet if not loyal, while others posit that the growing sectarian nature of the conflict only reinforces confessional loyalties. The Asad family maintains command of the military and intelligence apparatus, although defections continue among mostly Sunni soldiers and officers.

With Russia and China having effectively blocked United Nations involvement, there is concern that, left with no choice, foreign nations, either working together or unilaterally, will intervene (either directly or indirectly) in Syria's civil war. To some extent, this may already be occurring. Russia has opposed calls for an international arms embargo and may have sent arms shipments to Syrian security forces.<sup>4</sup> Syria's other main ally, Iran, has reportedly sent military advisors,<sup>5</sup> cash, and weapons to Syria to aid in the government's crackdown. It also has assisted Syria in circumventing sanctions by selling its oil abroad.<sup>6</sup> At present, Lebanon's Hezbollah has stated its support for the Asad government and has warned that third-party intervention in Syria's crisis could lead to regional conflagration, widely interpreted as a threat to Israel and regional peace. The Emir of Qatar has called for Arab troops to be dispatched to Syria as part of a peacekeeping force and, on February 12, the Arab League asked the United Nations Security Council to send a peacekeeping mission to Syria. Al Qaeda leader Ayman al Zawahri and other violent extremists have called on Muslims to support the uprising.

U.S. concerns about regional security and state-sponsored terrorism are directly implicated by the potential for inconclusive unrest or drastic political change in Syria. The potential spillover effects of continued or more intense violence raise unique questions with regard to Turkey, Lebanon, Jordan, Iraq, and Israel. Refugee flows, sectarian conflict, or transnational violence by non-state actors are among the contingencies that policy makers are considering in relation to these countries. A host of concerns could emerge if developments create opportunities for other violent Islamist groups to operate in Syria. The security of Syrian conventional and chemical weapons stockpiles has already become a regional security concern, which would grow if civil war or a security vacuum emerge. Many observers worry that an escalation in fighting or swift regime change could generate new pressures on minority groups or lead to wider civil conflict.

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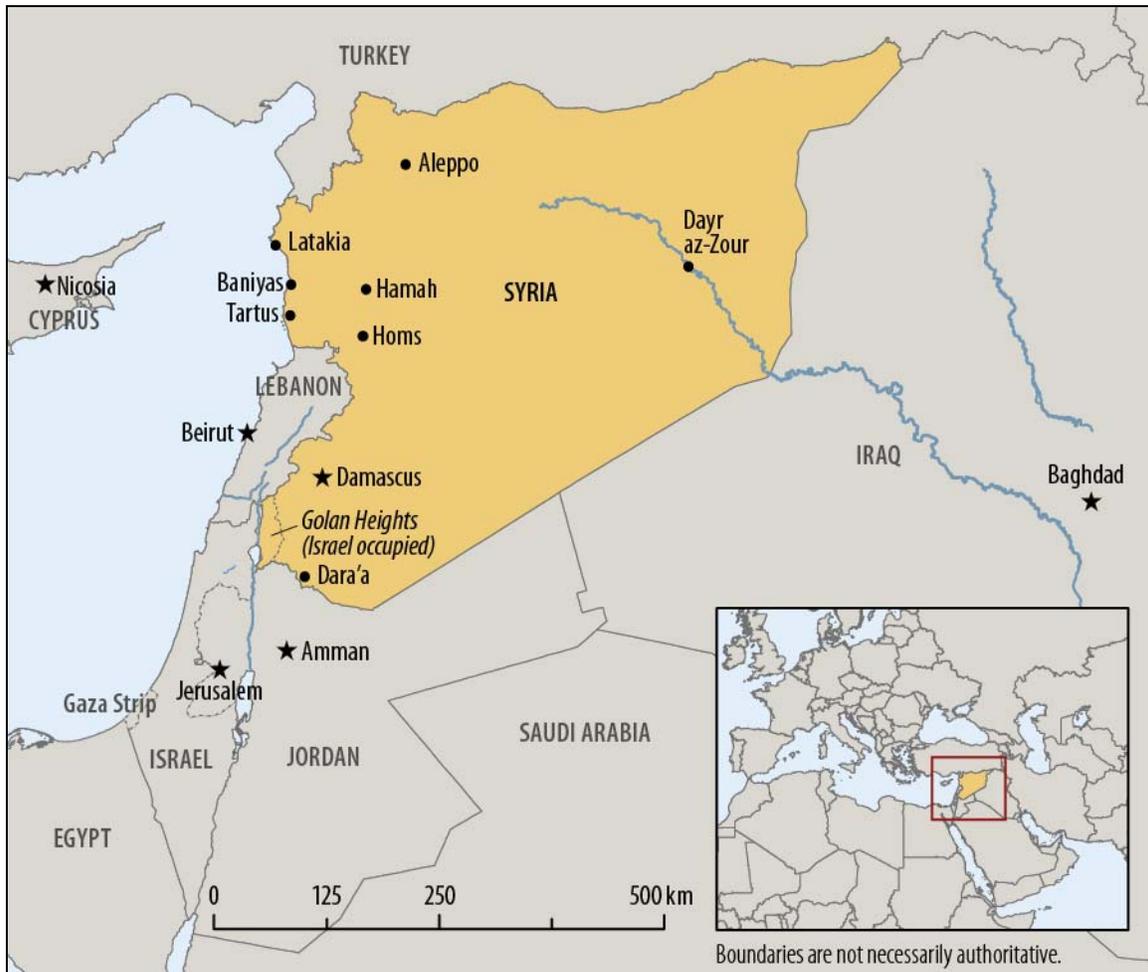
<sup>3</sup> In January 2012, a group of Alawite intellectuals issued a statement urging "Alawite Syrians, religious and ethnic minorities afraid of the consequences of a possible fall of the regime, to participate in efforts to overturn the oppressive government and participate in the construction of a new Syrian republic based on the rule of law and citizenship." See, "Alawite intellectuals reject sectarianism in Syria," *Agence France Presse*, January 19, 2012.

<sup>4</sup> See, "Russia/Syria politics: Supporting Syria," *Economist Intelligence Unit – ViewsWire*, February 9, 2012.

<sup>5</sup> In December 2011, the FSA captured five Iranians who the Iranian government claimed were engineers. The detainees later admitted they were military advisers sent to Syria to assist in the crackdown. See, U.S. government Open Source Center (OSC), "Syria: YouTube Video Purportedly Shows Captured Iranian IRGC Members," YouTube in Arabic, January 26, 2012, Document ID# GMP20120126835007.

<sup>6</sup> "New Bid To Stifle Iran Aid To Syria," *Wall Street Journal*, January 19, 2012.

Figure I. Map of Syria



Source: CRS Graphics.

## Opposition and Armed Groups

Syrian opposition groups have grown more organized as the uprising has unfolded, but remain divided over strategy, tactics, coordination, and leadership. During the protest stage of the uprising, Local Coordinating Councils active in many areas created an informal network linking activists around the country. As the unrest has moved toward greater violence and confrontation, the focus of attention has shifted to armed opposition activists operating as part of the Free Syrian Army. Two opposition coalition groups, one based in Syria and the other based in neighboring Turkey, continue to compete for political leadership. Overall, the opposition movement remains loosely coordinated, with agreements for cooperation existing amid periodic discord.

- The **Free Syrian Army (FSA)** consists of dissident military personnel and officers who have defected and are targeting government security forces in armed

attacks. FSA forces are rumored to number in the low hundreds with possibly thousands of loosely affiliated supporters. Precise and verifiable estimates are not available. Public accounts further suggest that thousands of Syrian military and security personnel have deserted or otherwise defected to non-FSA activities during the uprising as forces have been increasingly stretched geographically and logistically and as individuals have rejected orders to crack down on civilian protestors. In spite of a November 2011 coordination agreement with the Syrian National Council (see below), the FSA and its activities have remained the subject of controversy. In early 2012, the FSA announced that it would escalate its activities in response to continued regime violence. Some opposition activists opposed the move and argued that an increased use of force could spark a broad civil war. On February 10, FSA Commander Colonel Riyadh al Asad said that the FSA "must attack all the regime's military and security centers that are used for attacking the Syrian people and repressing them." Media reports and video footage posted by FSA members depict widespread, direct combat between FSA/FSA-affiliated forces and Syrian security forces. Sub-units active in combat include the Hamzah Bin Abdelmuttalib Brigade, the Dhi al Nurayn Brigade, and the Al Faruq Brigade. The FSA's deputy commander is Colonel Malik al Kurdi.

- The **Syrian National Council (SNC)** was formally organized in Turkey in October 2011 and brings together a range of external activists, along with representatives of the Damascus Declaration Forces for National and Democratic Change, the Syrian Muslim Brotherhood, and the Syrian Revolution General Commission (SRGC). The National Council distinguished itself in late 2011 by calling for "immediate protection for civilians," in contrast to some of its domestic counterparts who defined themselves in part by their opposition to any external intervention. The Council rejected the Arab League agreement with the Syrian government on November 2 (see below), and called on the Arab League "to freeze Syria's membership, ensure the protection of civilians and recognize the SNC as the representative of the Syrian revolution." Prominent leaders of the SNC include Council chairman Burhan Ghalyun, a France-based Syrian academic, and Muhammad Riyad al Shaqfah, the Controller General of the Syrian Muslim Brotherhood.
- The **National Coordination Commission of the Forces of Democratic Change (NCC)** is a Syria-based alliance of leftist groups, Kurdish activists, and individuals associated with the 2005 Damascus Declaration on political reform. The NCC has criticized calls for any civilian protection measures that might invite external military intervention and had left open the prospect of dialogue with the Syrian government, predicated on an end to the use of force against civilians. Prominent leaders of the NCC include general coordinator Hassan Abd al Azim and long-time domestic opposition activists such as Michel Kilo. The NCC has been critical of FSA activities and has argued in favor of preserving the unity of the national military.

The use of force by Syrian opposition groups raises fundamental questions about the nature and future of the Syrian uprising. It also is complicating internal opposition debates over strategy and tactics. Some groups view force as a necessary and appropriate response to the violently repressive tactics being used by government personnel. Others argue that the use of force opens the opposition to criticism, undercuts its international legitimacy, and could increase fear among "fence sitting" supporters of the government about the likelihood of violent chaos in the wake of

regime change. The debate over the use of force is an extension of the broader political debate that earlier divided the leading opposition groups over the possibility of dialogue with the Asad government. Those who view the government as disingenuous in its offers of reform and dialogue may be more likely to support or acquiesce to the use of force as the political confrontation continues. The Syrian government has condemned the use of force against state security personnel and attributes the growing number of attacks on military and police forces to "terrorists" and armed Islamists. Opposition activists have accused the Syrian authorities of staging several prominent bomb attacks in urban areas as a means of discrediting the opposition.

## **U.S. Policy and Sanctions**

President Obama and his Administration have been calling for Asad's resignation since August 2011 and have been vocal advocates for United Nations Security Council action to facilitate his removal. However, with the council deadlocked and Russia and China showing no public willingness to endorse a military intervention in Syria, the Administration may be searching for new ways to accelerate Asad's departure. U.S. diplomats are reportedly working to organize a "Friends of Syria" international conference in order to increase diplomatic pressure both on the regime and its foreign backers.

There has been no public indication that the Administration is planning to become militarily involved in the conflict there, either directly or indirectly. When asked if the Administration would consider arming the Syrian opposition, U.S. State Department spokeswoman Victoria Nuland said that "We never take anything off the table. The President does (or) doesn't. However, as the president himself made absolutely clear and as the secretary has continued to say, we don't think more arms into Syria is the answer."<sup>7</sup>

Many experts assert that direct military involvement that does not involve ground troops would be extremely difficult given the nature of the conflict. Syria's civil war is being fought mostly in urban environments amidst the civilian population making the use of air power to strike at regime units more difficult. According to one unnamed high level U.S. official, "What frustrates . . . us is that there are no silver bullets here....There are no good options."<sup>8</sup>

The United States has closed its embassy in Damascus. On February 6, the State Department suspended operations there and Ambassador Robert Ford left the country. Ambassador Ford wrote after his departure that "I left Damascus with immense sadness and regret—I wish our departure had not been necessary, but our Embassy, along with several other diplomatic missions in the area, was not sufficiently protected, given the new security concerns in the capital."<sup>9</sup>

The Administration has continued to expand U.S. sanctions on Syria while advocating further multilateral sanctions. **Table A-1** in the Appendix summarizes U.S. sanctions activity since the start of the Syria uprising in March 2011.

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<sup>7</sup> Daily Press Briefing - February 7, 2012, State Department Press Releases And Documents.

<sup>8</sup> "U.S. sees few good options in Syria," *Washington Post*, February 11, 2012.

<sup>9</sup> "US envoy posts satellite image as proof of Syria violence," *Reuters*, February 10, 2012.

## **Congressional Action**

The Syrian government's use of lethal force in response to political demonstrations has refocused attention on the basic tenets of U.S. policy toward Syria. Some Members of Congress and nongovernmental observers argue that the recent violence demonstrates the futility of expecting any substantive reform by Syrian authorities and suggests that U.S. policy should shift toward outright confrontation and embrace regime change as a policy goal. While the Administration has called for President Asad to step down, arguments in favor of regime change have been accompanied by wariness about what the implications of confrontation would be, and what the implications of regime change would be for regional security, particularly in light of the delicate sectarian balance in the Levant and a lack of established U.S. relationships with government and nongovernment actors in Syria. Other lawmakers have urged a gradual approach of increasing multilateral political condemnation and economic pressure against the Asad regime. The second table in the **Appendix** summarizes legislation introduced in the 112<sup>th</sup> Congress that seeks to address the unrest and conflict in Syria.

## **The Effect of Sanctions: Syria's Economy Under Strain**

Reports indicate that the Syrian economy and national budget are suffering due to a steep drop in oil exports resulting from sanctions, almost a year of domestic unrest and the loss of international tourism revenues, and new social and military spending aimed at quelling public anger. Estimates vary on the degree of contraction in 2011, ranging between 5 to as high as 15 percent.<sup>10</sup> Urban areas are now experiencing daily power outages, inflation is rising, and the value of the Syrian pound has plummeted on the black market, forcing the government to spend resources propping it up.

With the loss of European markets due to an oil export ban, Western countries have denied Syria a major source of revenue and hard currency (25%-30% of total government revenue or \$4 billion a year). According to Syrian Oil Minister Sufian Alao, Western sanctions on Syrian oil exports have cost the country \$2 billion since September 2011.

Before sanctions, the main buyers of approximately 150,000 barrels per day (bpd) of exported Syrian oil were Italy, Germany, France, the Netherlands, Austria, Spain and Turkey. Syria produces about 380,000 bpd total. Foreign oil companies which have suspended operations in Syria include: Tatneft (Russia), Royal Dutch/Shell Group, Total (France), Gulfsands (UK), Suncor (Canada), and INA (Croatia). The operating status of two Chinese companies with investments in Syria, CNPC and Sinopec is unknown.<sup>11</sup> Western countries also have banned new investment in Syria's oil and gas sector. Sanctions also are having an impact on other aspects of Syria's energy sector, including financing and shipping. According to one oil products trader based in the Middle East, "I don't do Syria anymore. Sanctions appeared tougher, so I gave up.... The problem is getting a bank to finance it and a ship owner to go there."<sup>12</sup>

Since new sanctions were enacted, many analysts have speculated about whether new investors and foreign markets would arise for Syrian oil exports, albeit at lower prices due to sanctions and

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<sup>10</sup> "Cracks Widen in Syrian Economy," *IPS*, January 24, 2012.

<sup>11</sup> "Syria: Voting with their feet," *Economist Intelligence Unit - Business Middle East*, January 16, 2012.

<sup>12</sup> "Syria Cancels Fuel Export Tender, Sanctions Deter," Reuters, November 3, 2011.

increased shipping costs. Some experts believe that both India and China are in a position to refine the heavy crude that Syria exports, and some reports suggest that India's ONGC is considering importing oil it currently produces in Syria to India, instead of shutting down its field operations.<sup>13</sup> According to one energy expert, "There is almost certainly someone who will buy it.... In the past there have been trading companies that would launder oil for Iraq or Iran, for example. Some countries will buy gasoline from Caribbean refiners without knowing the origin of the oil."<sup>14</sup> However, others assert that some Asian buyers would find the prospect of purchasing Syrian oil too risky. According to one report, "As far as Chinese and the Indians are concerned, they could of course try to buy some volumes. But the economics don't make any sense for them and volumes are too small to take the risks."<sup>15</sup>

## Options and Implications

The mounting civilian death toll in Syria has continued to garner calls for international intervention in the conflict. However, at this time, there continues to be no strong consensus on whether the international community should or could aid the Syrian opposition in removing the Asad regime from power. Various experts have offered several military options, including: deploying ground troops, employing air power, sending international peacekeepers to Syria, establishing No-Fly-Zones, creating buffer zones or safe havens inside Syria, providing logistical support to rebels such as satellite imagery, and training and equipping rebel soldiers.

However, Syrians themselves, even those who may be in favor of some degree of international intervention, may be divided over the extent of any international mission. Furthermore, no Western military power has publicly indicated its desire to intervene militarily inside Syria. NATO Secretary General Anders Fogh Rasmussen said in late 2011 that NATO has "no intention whatsoever to intervene in Syria." Many experts have asserted that "Syria is not Libya," referring to the different terrain, the nature of the conflict there, the lack of physical protection for opposition forces, and the general volatile regional environment.

For now, the major question before concerned international actors is how to support Syria's opposition in a supportive manner that circumvents the United Nations Security Council veto of Russia and China, assuming both nations do not change their position on Syria. Even a recent Arab League-approved resolution continued to seek U.N. approval by calling on the Security Council to authorize a joint Arab-United Nations force to "supervise the execution of a cease-fire."

Diplomatic options may hold symbolic significance, but are not expected to change military circumstances on the ground. Observers have suggested that interested parties form an international contact group to coordinate action on Syria or that willing nations begin to recognize the Syrian opposition as the legitimate government by appointing special diplomatic representatives to groups such as the Syrian National Council or the Free Syrian Army.

U.S. policy toward Syria since the 1980s has ranged from confrontation and containment to cautious engagement, as successive Congresses and Administrations have sought to end Syria's

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<sup>13</sup> "Syrian Oil Exports Paralyzed as Sanctions Bite," Reuters, September 22, 2011.

<sup>14</sup> "Syria looking for buyers after West rejects its oil," *International Herald Tribune*, September 29, 2011.

<sup>15</sup> Reuters, September 22, 2011, op.cit.

support for terrorism, encourage regional peace talks, and prevent proliferation of missiles and weapons of mass destruction. In the event of a swift regime change or other political transition in Syria, U.S. officials and Members of Congress will face a series of complex decisions regarding the timing and scope of potential changes to existing policy and sanctions to facilitate or further restrict relations with a successor government.

In the interim, Congress and the Administration could seek to increase the pressure on the Asad regime through the sanctioning of third-party entities engaged in financial transactions with Syria or through the pursuit of greater multilateral sanctions enforcement. The provision of material support to political and armed opposition activists also remains an option, if a controversial one. Prior to such an effort, initiatives to develop stronger relationships with newly prominent and influential Syrian actors may also be considered.<sup>16</sup> In any regime collapse scenario, the United States or others may consider some form of rapid response to secure stockpiles of missiles and unconventional weapons, as is being done in Libya.

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<sup>16</sup> To date, robust U.S. sanctions have limited official and nongovernmental contacts between the two countries leaving the U.S. government with few well-established relationships with influential Syrians or the broader Syrian population. Bilateral security cooperation has been limited to reported intelligence coordination on counterterrorism issues of shared concern: the absence of regular U.S. engagement with Syrian military officers limits U.S. insight into current and future developments involving Syrian military personnel whose defections are now important factors in the ongoing unrest.

## **Appendix. U.S. Sanctions and Legislation**

### **Overview**

At present, a variety of legislative provisions and executive directives prohibit U.S. aid to Syria and restrict bilateral trade. Syria remains a U.S.-designated State Sponsor of Terrorism and is therefore subject to a number of general U.S. sanctions. Syria was placed on the State Department's State Sponsors of Terrorism List in 1979. Moreover, between 2003 and 2006 Congress passed legislation and President Bush issued new executive orders that expanded U.S. sanctions specifically on Syria.

- The first table below reviews sanctions introduced since early 2011 in response to Syria's uprising.
- The second table below summarizes legislation introduced in the 112<sup>th</sup> Congress regarding the Syrian uprising, sanctions, and U.S. policy.
- Syria-specific sanctions and general sanctions applicable to Syria are also summarized below.

### **Background on U.S. Assistance to Syria and Restrictions**

Because of a number of legal restrictions and U.S. sanctions, many resulting from Syria's designation as a country supportive of international terrorism, Syria is no longer eligible to receive U.S. foreign assistance. Between 1950 and 1981, the United States provided a total of \$627.4 million in aid to Syria: \$34.0 million in development assistance, \$438.0 million in economic support, and \$155.4 million in food assistance. Most of this aid was provided during a brief warming trend in bilateral relations between 1974 and 1979. Significant projects funded with U.S. assistance included water supply, irrigation, rural roads and electrification, and health and agricultural research. No aid has been provided to Syria since 1981, when the last aid programs were closed out. In the event of regime change, the Obama Administration and Congress would need to reevaluate any successor government's policies with regard to support for international terrorism in order to determine Syria's potential eligibility for U.S. assistance.

**Table A-1. U.S. Sanctions Against Syria in 2011-2012**  
(Implemented by Treasury Department's Office of Foreign Assets Control [OFAC])

<b>Date</b>	<b>Sanctioned Individual/Entity</b>	<b>Sanction or Related Activity Description</b>
February 16, 2012	Iranian Ministry of Intelligence and Security	Added to OFAC's Specially Designated Nationals (SDN) List
December 1, 2011	Muhammad Makhluf, Military Housing Establishment, Real Estate Bank	Added to OFAC's Specially Designated Nationals (SDN) List
October 3, 2011		OFAC issued two general licenses related to Syria to authorize payments in connection with overflight or emergency landing and transactions with respect to telecommunications
September 27, 2011		OFAC issued a General License related to Syria to authorize third-country diplomatic and consular funds transfers and to authorize certain services in support of nongovernmental organizations' activities.
September 9, 2011		OFAC issued four general licenses related to Syria to authorize wind down transactions, certain official activities of international organizations, incidental transactions related to U.S. persons residing in Syria and operation of accounts.
August 30, 2011	Walid Mouallem (Foreign Minister), Ali Abdul Karim Ali (Syrian Ambassador to Lebanon), Bouthaina Shaaban (Advisor to the President)	Added to OFAC's Specially Designated Nationals (SDN) List
August 18, 2011	Government of Syria	Executive Order 13582 - Freezes all assets of the Government of Syria, prohibits U.S. persons from engaging in any transaction involving the Government of Syria, bans U.S. imports of Syrian-origin petroleum or petroleum products, prohibits U.S. persons from having any dealings in or related to Syria's petroleum or petroleum products, and prohibits U.S. persons from operating or investing in Syria.
August 18, 2011	General Petroleum Corporation, Syrian Company For Oil Transport, Syrian Gas Company, Syrian Petroleum Company, Sytrol	Added to OFAC's SDN List
August 10, 2011	Commercial Bank of Syria and its Lebanon-based subsidiary, Syrian Lebanese Commercial Bank, Syriatel, the country's main mobile phone operator	Added to OFAC's SDN List
August 4, 2011	Muhammad Hamsho (businessman with ties to Asad family), Hamsho International Group	Added to OFAC's SDN List
June 29, 2011	Jamil Hassan (Head of Air Force Intelligence), Political Security Directorate (PSD, domestic intelligence)	Added to OFAC's SDN List

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<b>Date</b>	<b>Sanctioned Individual/Entity</b>	<b>Sanction or Related Activity Description</b>
May 18, 2011	President Bashar al Asad, Farouk al Shara (vice president), Adel Safar (prime minister), Mohammad Ibrahim al Shaar (minister of the interior), Ali Habib Mahmoud (minister of defense), Abdul Fatah Qudsiya (head of Syrian military intelligence), Mohammed Dib Zaitoun (director of political security directorate), Nabil Rafik al Kuzbari, General Mohsen Chizari (Commander of Iran Revolutionary Guard Corp Qods Force suspected of human rights abuses in Syria), Al Mashreq Investment Fund, Bena Properties, Cham Holding, Syrian Air Force Intelligence, Syrian Military Intelligence, Syrian National Security Bureau	Executive Order 13573 adds listed individuals and entities to OFAC's SDN List
April 29, 2011	Maher al Asad, Ali Mamluk (director of the Syrian General Intelligence Directorate GID), Atif Najib (former head of the Syrian Political Security Directorate for Dara'a province and the president's cousin), the General Intelligence Directorate, and Iran's Islamic Revolutionary Guard Corps – Quds Force (for allegedly assisting Syria in its crackdown)	Executive Order 13572 adds listed individuals and entities to OFAC's SDN List

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**Source:** U.S. Treasury Department.

**Notes:** As part of its enforcement efforts, OFAC publishes a list of individuals and companies owned or controlled by, or acting for or on behalf of, targeted countries. It also lists individuals, groups, and entities, such as terrorists and narcotics traffickers designated under programs that are not country-specific. Collectively, such individuals and companies are called Specially Designated Nationals or SDNs. Their assets are blocked and U.S. persons are generally prohibited from dealing with them.

### **Syria Legislation in the 112<sup>th</sup> Congress**

The following legislation introduced in the 112<sup>th</sup> Congress addresses the current situation in Syria.

- H.R. 2106, The Syria Freedom Support Act—Would, among other things, sanction the development of petroleum resources of Syria, the production of refined petroleum products in Syria, and the exportation of refined petroleum products to Syria.
- H.Res. 296 (S.Res. 180 in the Senate), A Resolution Expressing support for peaceful demonstrations and universal freedoms in Syria and condemning the human rights violations by the Assad Regime—Among other things, it urges the “President to continue to work with the European Union, the Government of Turkey, the Arab League, the Gulf Cooperation Council, and other allies and partners to bring an end to human rights abuses in Syria, hold the perpetrators accountable, and support the aspirations of the people of Syria.”
- H.R. 2105, The Iran, North Korea, and Syria Nonproliferation Reform and Modernization Act of 2011—States that it shall be U.S. policy to fully implement and enforce sanctions against Iran, North Korea, and Syria for their proliferation activities and policies. Would, among other things, prohibit U.S. nuclear cooperation agreements and related export licenses and transfers of materials, services and goods with a country that is assisting the nuclear program of Iran, North Korea, or Syria, or is transferring advanced conventional weapons to such countries.
- S. 1048, The Iran, North Korea, and Syria Sanctions Consolidation Act of 2011—Amends the Iran, North Korea, and Syria Nonproliferation Act to include in the scope of such act a person that (1) acquired materials mined or extracted within North Korea’s territory or control; or (2) provided shipping services for the transportation of goods to or from Iran, North Korea, or Syria relating to such countries’ weapons of mass destruction programs, support for acts of international terrorism, or human rights abuses. Excludes from such provisions shipping services for emergency or humanitarian purposes.
- S. 1472, The Syria Sanctions Act of 2011—Denies companies that conduct business in Syria’s energy sector (investment, oil purchases, and sale of gasoline) access to U.S. financial institutions and requires federal contractors to certify that they are not engaged in sanctionable activity.
- S. 2034, Syria Human Rights Accountability Act of 2012 —Imposes sanctions on persons who are responsible for or complicit in certain human rights abuses. Also prohibits procurement contracts with persons that export sensitive technology to Syria.
- S.Res. 370, calling for democratic change in Syria, would state the Senate’s condemnation of “ongoing, widespread, and systemic violations of human rights conducted by authorities in Syria” and calls on Bashar al Assad to step down. The non-binding resolution would urge the President to support a democratic transition in Syria, establish a Friends of Syria Contact Group, develop a strategy to encourage further military defections, and “develop a plan to identify weapons stockpiles and prevent the proliferation of conventional, biological, chemical, and other types of weapons in Syria.”

### **Specific Sanctions Against Syria**

Specific U.S. sanctions levied against Syria fall into three main categories: (1) sanctions resulting from the passage of the 2003 Syria Accountability and Lebanese Sovereignty Act (SALSA) that, among other things, prohibit most U.S. exports to Syria; (2) sanctions imposed by executive order from the President that specifically deny certain Syrian citizens and entities access to the U.S. financial system due to their participation in proliferation of weapons of mass destruction, association with Al Qaeda, the Taliban, or Osama bin Laden; or destabilizing activities in Iraq and Lebanon; and (3) sanctions resulting from the USA PATRIOT Act levied specifically against the Commercial Bank of Syria in 2006.

## **The 2003 Syria Accountability Act**

On December 12, 2003, President Bush signed H.R. 1828, the Syria Accountability and Lebanese Sovereignty Restoration Act into law, as P.L. 108-175. This law requires the President to impose penalties on Syria unless it ceases support for international terrorist groups, ends its occupation of Lebanon, ceases the development of weapons of mass destruction (WMD), and has ceased supporting or facilitating terrorist activity in Iraq (§§5(a) and 5(d)). Sanctions include bans on the export of military items (already banned under other legislation, see above<sup>17</sup>) and of dual use items (items with both civil and military applications) to Syria (§5(a)(1)). In addition, the President is required to impose two or more sanctions from a menu of six:

- a ban on all exports to Syria except food and medicine;
- a ban on U.S. businesses operating or investing in Syria;
- a ban on landing in or overflight of the United States by Syrian aircraft;
- reduction of diplomatic contacts with Syria;
- restrictions on travel by Syrian diplomats in the United States; and
- blocking of transactions in Syrian property (§ 5(a)(2)).

## ***Implementation***

On May 11, 2004, President Bush issued Executive Order 13338, implementing the provisions of P.L. 108-175, including the bans on munitions and dual use items (§5(a)(1)) and two sanctions from the menu of six listed in Section 5(a)(2). The two sanctions he chose were the ban on exports to Syria other than food and medicine (§5(a)(2)(A)) and the ban on Syrian aircraft landing in or overflying the United States (§5(a)(2)(D)). In issuing his executive order, the President stated that Syria has failed to take significant, concrete steps to address the concerns that led to the enactment of the Syria Accountability Act. The President also imposed two additional sanctions based on other legislation.

- Under Section 311 of the USA PATRIOT Act, he instructed the Treasury Department to prepare a rule requiring U.S. financial institutions to sever correspondent accounts with the Commercial Bank of Syria because of money laundering concerns.
- Under the International Emergency Economic Powers Act (IEEPA), he issued instructions to freeze assets of certain Syrian individuals and government entities involved in supporting policies inimical to the United States.

## ***Waivers***

In the executive order and in an accompanying letter to Congress, President Bush cited the waiver authority contained in Section 5(b) of the Syria Accountability Act and stated that he wished to issue the following waivers on grounds of national security:

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<sup>17</sup> Syria's inclusion on the State Sponsors of Terrorism List as well as SALSA requires the President to restrict the export of any items to Syria that appear on the U.S. Munitions List (weapons, ammunition) or Commerce Control List (dual-use items).

Regarding Section 5(a)(1) and 5(a)(2)(A): The following exports are permitted: products in support of activities of the U.S. government; medicines otherwise banned because of potential dual use; aircraft parts necessary for flight safety; informational materials; telecommunications equipment to promote free flow of information; certain software and technology; products in support of U.N. operations; and certain exports of a temporary nature.<sup>18</sup>

Regarding Section 5(a)(2)(D): The following operations are permitted: takeoff/landing of Syrian aircraft chartered to transport Syrian officials on official business to the United States; takeoff/landing for non-traffic and non-scheduled stops; takeoff/landing associated with an emergency; and overflights of U.S. territory.

## **Targeted Financial Sanctions**

Since the initial implementation of the Syria Accountability Act (in Executive Order 13338 dated May 2004), the President has repeatedly taken action to sanction individual members of the Asad regime's inner circle.<sup>19</sup> E.O. 13338 declared a national emergency with respect to Syria and authorized the Secretary of the Treasury to block the property of individual Syrians. Based on Section 202(d) of the National Emergencies Act (50 U.S.C. 1622(d)), the President has annually extended his authority to block the property of individual Syrians (latest on April 29, 2011). When issuing each extension, the President has noted that the actions and policies of the government of Syria continued to pose an unusual and extraordinary threat.<sup>20</sup>

The following individuals and entities have been targeted by the U.S. Treasury Department (Office of Foreign Assets Control or OFAC):

- On June 30, 2005, the U.S. Treasury Department designated two senior Syrian officials involved in Lebanon affairs, Syria's then-Interior Minister and its head of military intelligence in Lebanon (respectively, the late General Kanaan and General Ghazali), as Specially Designated Nationals, thereby freezing any assets they may have in the United States and banning any U.S. persons, including U.S. financial institutions outside of the United States, from conducting transactions with them.<sup>21</sup> Kanaan allegedly committed suicide in October 2005, though some have speculated that he may have been murdered.

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<sup>18</sup> According to U.S. regulations, any product that contains more than 10% *de minimis* U.S.-origin content, regardless of where it is made, is not allowed to be exported to Syria. For U.S. commercial licensing prohibitions on exports and re-exports to Syria, see 15 C.F.R. pt. 736 Supp No. 1. The Department of Commerce reviews license applications on a case-by-case basis for exports or re-exports to Syria under a general policy of denial. For a description of items that do not require export licenses, see, Bureau of Industry and Security (BIS), U.S. Department of Commerce, Implementation of the Syria Accountability Act, available at [http://www.bis.doc.gov/licensing/syriaimplementationmay14\\_04.htm](http://www.bis.doc.gov/licensing/syriaimplementationmay14_04.htm).

<sup>19</sup> According to the original text of E.O. 13338, the President's authority to declare a national emergency authorizing the blocking of property of certain persons and prohibiting the exportation or re-exportation of certain goods to Syria is based on "The Constitution and the laws of the United States of America, including the International Emergency Economic Powers Act (50 U.S.C. 1701 et seq.) (IEEPA), the National Emergencies Act (50 U.S.C. 1601 et seq.) (NEA), the Syria Accountability and Lebanese Sovereignty Restoration Act of 2003, P.L. 108-175 (SAA), and Section 301 of Title 3, United States Code." available at <http://www.treasury.gov/resource-center/sanctions/Documents/13338.pdf>.

<sup>20</sup> The President last extended the State of Emergency on April 29, 2011.

<sup>21</sup> See <http://www.treasury.gov/press-center/press-releases/Pages/js2617.aspx>.

- On January 18, 2006, U.S. Treasury Department took the same actions against the President's brother-in-law, Assef Shawkat, chief of military intelligence.
- On April 26, 2006, President Bush issued Executive Order 13399 that authorized the Secretary of the Treasury to freeze the U.S.-based assets of anyone found to be involved in the February 2005 assassination of former Lebanese Prime Minister Rafiq Hariri. It also affects anyone involved in bombings or assassinations in Lebanon since October 2004, or anyone hindering the international investigation into the Hariri assassination. The order allows the United States to comply with UNSCR 1636, which calls on all states to freeze the assets of those persons designated by the investigating commission or the government of Lebanon to be involved in the Hariri assassination.
- On August 15, 2006, the U.S. Treasury Department froze assets of two other senior Syrian officers: Major General Hisham Ikhtiyar, for allegedly contributing to Syria's support of foreign terrorist organizations including Hezbollah; and Brigadier General Jama'a Jama'a, for allegedly playing a central part in Syria's intelligence operations in Lebanon during the Syrian occupation.<sup>22</sup>
- On January 4, 2007, the U.S. Treasury Department designated three Syrian entities, the Syrian Higher Institute of Applied Science and Technology, the Electronics Institute, and the National Standards and Calibration Laboratory, as weapons proliferators under an executive order (E.O.13382) based on the authority vested to the President under IEEPA. The three state-sponsored institutions are divisions of Syria's Scientific Studies and Research Center, which was designated by President Bush as a weapons proliferator in June 2005 for research on the development of biological and chemical weapons.<sup>23</sup>
- On August 1, 2007, the President issued E.O. 13441<sup>24</sup> blocking the property of persons undermining the sovereignty of Lebanon or its democratic processes and institutions. On November 5, 2007, the U.S. Treasury Department designated four individuals reportedly affiliated with the Syrian regime's efforts to reassert Syrian control over the Lebanese political system, including Assaad Halim Hardan, Wi'am Wahhab and Hafiz Makhlef (under the authority of E.O.13441) and Muhammad Nasif Khayrbik (under the authority of E.O.13338).<sup>25</sup>
- On February 13, 2008, President Bush issued another Order (E.O.13460) blocking the property of senior Syrian officials. According to the U.S. Treasury Department, the order "targets individuals and entities determined to be responsible for or who have benefitted from the public corruption of senior officials of the Syrian regime. The order also revises a provision in Executive

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<sup>22</sup> See <http://www.treasury.gov/press-center/press-releases/Pages/hp60.aspx>.

<sup>23</sup> See <http://www.treasury.gov/press-center/press-releases/Pages/hp216.aspx>.

<sup>24</sup> On July 29, 2010, President Obama extended that National Emergency with respect to Lebanon for another year, stating that "While there have been some recent positive developments in the Syrian-Lebanese relationship, continuing arms transfers to Hizballah that include increasingly sophisticated weapons systems serve to undermine Lebanese sovereignty, contribute to political and economic instability in Lebanon, and continue to pose an unusual and extraordinary threat to the national security and foreign policy of the United States." See, Notice of July 29, 2010—Continuation of the National Emergency With Respect to the Actions of Certain Persons to Undermine the Sovereignty of Lebanon or Its Democratic Processes and Institutions, Federal Register, Title 3—The President, [Page 45045].

<sup>25</sup> See <http://www.treasury.gov/press-center/press-releases/Pages/hp666.aspx>.

Order 13338 to block the property of Syrian officials who have undermined U.S. and international efforts to stabilize Iraq.<sup>26</sup> One week later, under the authority of E.O. 13460, the U.S. Treasury Department froze the U.S. assets and restricted the financial transactions of Rami Makhluf, a powerful cousin of President Bashar al Asad.

## **Sanctions Against the Commercial Bank of Syria**

As previously mentioned, under Section 311 of the USA PATRIOT Act, President Bush instructed the Treasury Department in 2004 to prepare a rule requiring U.S. financial institutions to sever correspondent accounts with the Commercial Bank of Syria because of money laundering concerns. In 2006, the Treasury Department issued a final ruling that imposes a special measure against the Commercial Bank of Syria as a financial institution of primary money laundering concern. It bars U.S. banks and their overseas subsidiaries from maintaining a correspondent account with the Commercial Bank of Syria, and it also requires banks to conduct due diligence that ensures the Commercial Bank of Syria is not circumventing sanctions through its business dealings with them.<sup>27</sup>

## **General Sanctions Applicable to Syria**

*The International Security Assistance and Arms Export Control Act of 1976* [P.L. 94-329]. Section 303 of this act [90 Stat. 753-754] required termination of foreign assistance to countries that aid or abet international terrorism. This provision was incorporated into the Foreign Assistance Act of 1961 as Section 620A [22 USC 2371]. (Syria was not affected by this ban until 1979, as explained below.)

*The International Emergency Economic Powers Act of 1977* [Title II of P.L. 95-223 (codified at 50 U.S.C. §1701 et seq.)]. Under the International Emergency Economic Powers Act (IEEPA), the President has broad powers pursuant to a declaration of a national emergency with respect to a threat “which has its source in whole or substantial part outside the United States, to the national security, foreign policy, or economy of the United States.” These powers include the ability to seize foreign assets under U.S. jurisdiction, to prohibit any transactions in foreign exchange, to prohibit payments between financial institutions involving foreign currency, and to prohibit the import or export of foreign currency.

*The Export Administration Act of 1979* [P.L. 96-72]. Section 6(i) of this act [93 Stat. 515] required the Secretary of Commerce and the Secretary of State to notify Congress before licensing export of goods or technology valued at more than \$7 million to countries determined to have supported acts of international terrorism. (Amendments adopted in 1985 and 1986 relettered Section 6(i) as 6(j) and lowered the threshold for notification from \$7 million to \$1 million.)

A by-product of these two laws was the so-called state sponsors of terrorism list. This list is prepared annually by the State Department in accordance with Section 6(j) of the Export

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<sup>26</sup> A previous executive order, E.O. 13315, blocks property of former Iraqi President Saddam Hussein and members of his former regime. On June 9, 2005, the Treasury Department blocked property and interests of a Syrian company, SES International Corp., and two of its officials under the authority of E.O. 13315.

<sup>27</sup> See, “U.S. Trade and Financial Sanctions Against Syria.” Available at <http://damascus.usembassy.gov/sanctions-syr.html>.

Administration Act. The list identifies those countries that repeatedly have provided support for acts of international terrorism. Syria has appeared on this list ever since it was first prepared in 1979; it appears most recently in the State Department's annual publication *Country Reports on Terrorism, 2009*, issued on August 5, 2010. Syria's inclusion on this list in 1979 triggered the above-mentioned aid sanctions under P.L. 94-329 and trade restrictions under P.L. 96-72.

*Omnibus Diplomatic Security and Antiterrorism Act of 1986* [P.L. 99-399]. Section 509(a) of this act [100 Stat. 853] amended Section 40 of the Arms Export Control Act to prohibit export of items on the munitions list to countries determined to be supportive of international terrorism, thus banning any U.S. military equipment sales to Syria. (This ban was reaffirmed by the Anti-Terrorism and Arms Export Amendments Act of 1989—see below.) Also, 10 U.S.C. 2249a bans obligation of U.S. Defense Department funds for assistance to countries on the terrorism list.

*Omnibus Budget Reconciliation Act of 1986* [P.L. 99-509]. Section 8041(a) of this act [100 Stat. 1962] amended the Internal Revenue Code of 1954 to deny foreign tax credits on income or war profits from countries identified by the Secretary of State as supporting international terrorism. [26 USC 901(j)]. The President was given authority to waive this provision under Section 601 of the Trade and Development Act of 2000 (P.L. 106-200, May 18, 2000).

*The Anti-Terrorism and Arms Export Control Amendments Act of 1989* [P.L. 101-222]. Section 4 amended Section 6(j) of the Export Administration Act to impose a congressional notification and licensing requirement for export of goods or technology, irrespective of dollar value, to countries on the terrorism list, if such exports could contribute to their military capability or enhance their ability to support terrorism.

Section 4 also prescribes conditions for removing a country from the terrorism list: prior notification by the President to the Speaker of the House of Representatives and the chairmen of two specified committees of the Senate. In conjunction with the requisite notification, the President must certify that the country has met several conditions that clearly indicate it is no longer involved in supporting terrorist activity. (In some cases, certification must be provided 45 days in advance of removal of a country from the terrorist list).

*The Anti-Economic Discrimination Act of 1994* [Part C, P.L. 103-236, the Foreign Relations Authorization Act, FY1994-1995]. Section 564(a) bans the sale or lease of U.S. defense articles and services to any country that questions U.S. firms about their compliance with the Arab boycott of Israel. Section 564(b) contains provisions for a presidential waiver, but no such waiver has been exercised in Syria's case. Again, this provision is moot in Syria's case because of other prohibitions already in effect.

*The Antiterrorism and Effective Death Penalty Act of 1996* [P.L. 104-132]. This act requires the President to withhold aid to third countries that provide assistance (§325) or lethal military equipment (§326) to countries on the terrorism list, but allows the President to waive this provision on grounds of national interest. A similar provision banning aid to third countries that sell lethal equipment to countries on the terrorism list is contained in Section 549 of the Foreign Operations Appropriations Act for FY2001 (H.R. 5526, passed by reference in H.R. 4811, which was signed by President Clinton as P.L. 106-429 on November 6, 2000).

Also, Section 321 of P.L. 104-132 makes it a criminal offense for U.S. persons (citizens or resident aliens) to engage in financial transactions with governments of countries on the terrorism list, except as provided in regulations issued by the Department of the Treasury in consultation

with the Secretary of State. In the case of Syria, the implementing regulation prohibits such transactions “with respect to which the United States person knows or has reasonable cause to believe that the financial transaction poses a risk of furthering terrorist acts in the United States.” (31 CFR 596, published in the *Federal Register* August 23, 1996, p. 43462.) In the fall of 1996, the then chairman of the House International Relations Committee reportedly protested to then President Clinton about the Treasury Department’s implementing regulation, which he described as a “special loophole” for Syria.

In addition to the general sanctions listed above, specific provisions in foreign assistance appropriations legislation enacted since 1981 have barred Syria by name from receiving U.S. aid. The most recent ban appears in Section 7007 of P.L. 112-74, Consolidated Appropriations Act, 2012, which states that “None of the funds appropriated or otherwise made available pursuant to titles III through VI of this Act shall be obligated or expended to finance directly any assistance or reparations for the governments of Cuba, North Korea, Iran, or Syria: Provided, That for purposes of this section, the prohibition on obligations or expenditures shall include direct loans, credits, insurance and guarantees of the Export-Import Bank or its agents.”

Section 307 of the Foreign Assistance Act of 1961, amended by Section 431 of the Foreign Relations Authorization Act for FY1994-1995 (P.L. 103-236, April 30, 1994), requires the United States to withhold a proportionate share of contributions to international organizations for programs that benefit eight specified countries or entities, including Syria.

The Iran Nonproliferation Act of 2000, P.L. 106-178, was amended by P.L. 109-112 to make its provisions applicable to Syria as well as Iran. The amended act, known as the Iran and Syria Nonproliferation Act, requires the President to submit semi-annual reports to designated congressional committees, identifying any persons involved in arms transfers *to or from* Iran or Syria; also, the act authorizes the President to impose various sanctions against such individuals. On October 13, 2006, President Bush signed P.L. 109-353 which expanded the scope of the original law by adding North Korea to its provisions, thereby renaming the law the Iran, North Korea, and Syria Nonproliferation Act (or INKSNA for short). The list of Syrian entities designated under INKSNA includes Army Supply Bureau (2008), Syrian Navy (2009), Syrian Air Force (2009), and Ministry of Defense (2008).<sup>28</sup> On May 24, 2011, the State Department designated the Industrial Establishment of Defense and Scientific Studies and Research Center (SSRC) under INKSNA.

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<sup>28</sup> See, State Department Press Releases And Documents “Near East: Iran, North Korea, and Syria Nonproliferation Act: Imposed Sanctions,” July 20, 2010.