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Sayı  
Our Reference : 4505

Konu  
Subject : ABD'nin İran'a Yönelik Yaptırımları Hk.

Sirküler No: 704 / 2018

**Sayın Üyemiz,**

İlgi: TOBB'nin 27.11.2018 tarih ve 17846 sayılı yazısı ile;

İlgi yazı ile; Dışişleri Bakanlığı'nın 06.11.2018 tarih ve 43143608-545.08.01 -2018/14517596 sayılı yazısından bahisle; ABD'nin İran'a yönelik yaptırımlara ilişkin olarak aşağıdaki hususlar yer almaktadır:

- ABD'nin İran'a yönelik olarak evvelce hayata geçirmekle birlikte, Kapsamlı Ortak Eylem Planı (KOEP) çerçevesinde kaldırdığı, enerji, gemi inşaatı, deniz taşımacılığı ve bankacılık alanlarındaki yaptırımların 5 Kasım itibariyle yeniden yürürlüğe girmesine ilişkin olarak ABD Hazine Bakanlığı Yabancı Varlıkların Kontrolü Ofisi (OFAC) tarafından yapılan basın açıklaması, (Ek-1)
- OFAC açıklamasında özetle, anılan kararla 700'ün üzerinde gerçek ve tüzel kişinin (deniz ve hava araçları dahil olmak üzere) yaptırıma tabi tutulduğu, söz konusu yaptırımların İran halkını değil İran rejimini hedef aldığı, bu çerçevede, tarım ürünleri, gıda, ilaç ve tıbbi cihazların İran'a satışını mümkün kılacak yetkilendirme ve istisnaların verilmeye devam edileceğinin belirtildiği,
- Yaptırım kararıyla 50 İran bankası, İran İslam Cumhuriyeti Denizcilik Hatları (Islamic Republic of Iran Shipping Lines) ve İran Ulusal Petrol Nakliyat Şirketi (National Iranian Tanker Company) başta olmak üzere deniz taşımacılığı alanında faaliyet gösteren önemli sayıda kurum ve şirket ile bunların araçları, İran Atom Enerji Örgütü ve İran'ın ulusal havayolu şirketi olan "İran Havayolları" (şirkete ait 67 uçak dahil) hakkında yaptırım kararı alındığının kaydedildiği,
- Açıklamada, haklarında yaptırım kararı alınan gerçek ve tüzel kişilerin ABD'de ya da ABD'lilerin kontrolü veya zilyetliğinde bulunan varlıklarının ve bunlardaki hisselerinin dondurulduğu, ABD uyrukluların bu gerçek ve tüzel kişilerle iş yapmalarının yasaklandığı, yaptırıma tabi söz konusu gerçek ve tüzel kişilerle iş ilişkisine girenlerin haklarında dava açılacağı ve yaptırımlara maruz kalabilecekleri ifade edildiği,
- Bahsekonu kararla yaptırıma tabi tutulan gerçek ve tüzel kişilerin (deniz ve hava araçları dahil olmak üzere) tam listesine [https://www.treasury.gov/resource-center/sanctions/OFAC-Enforcement/Pages/20181105\\_names.aspx](https://www.treasury.gov/resource-center/sanctions/OFAC-Enforcement/Pages/20181105_names.aspx) adresinden ulaşılabileceği,

hususları belirtilmektedir.

İlgi yazı Ek'i Odamızın web sayfasında [www.denizticaretodasi.org.tr](http://www.denizticaretodasi.org.tr) adresinde "Genel" ve "Mevzuat Duyuruları" bölümlerinde yayınlanmaktadır.

Saygılarımızla  
Murat TUNCER  
Genel Sekreter

**EK-1: İlgi Yazı Örneği (9 Sayfa - Web sayfasında)**

### **DAĞITIM GEREĞİ**

- Tüm Üyelerimiz (WEB Sayfasında)
- Türk Armatörler Birliği
- S.S. Gemi Armatörleri Mot. Taş. Koop.
- Vapur Donatanları ve Acenteleri Derneği
- TAİS
- İMEAK DTO Şubeleri ve Temsilcilikleri

### **BİLGİ**

- Yönetim Kurulu Bşk. ve Üyeleri
- İMEAK DTO Şube YK Başkanları
- İMEAK DTO Meslek Komite Bşk.



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# TOBB

Oda ve Borsa  
Genel Sekreterlerine

TÜRKİYE  
ODALAR VE BORSALAR  
BİRLİĞİ  
17846

Tarih : 27.11.2018  
Sayı : 0431/  
Konu : ABD'nin İran'a yönelik yaptırımları hk.

İlgi: Dışişleri Bakanlığı'nın 43143608-545.08.01-2018/14517596 sayılı 06.11.2018 tarihli yazısı.

Dışişleri Bakanlığından alınan, ABD'nin İran'a yönelik yaptırımlara ilişkin ilgede kayıtlı yazıda özetle aşağıdaki hususlar yer almaktadır:

“ABD'nin İran'a yönelik olarak evvelce hayata geçirmekle birlikte, Kapsamlı Ortak Eylem Planı (KOEP) çerçevesinde kaldırdığı, enerji, gemi inşaatı, deniz taşımacılığı ve bankacılık alanlarındaki yaptırımların dün (5 Kasım) itibariyle yeniden yürürlüğe girmesine ilişkin olarak ABD Hazine Bakanlığı Yabancı Varlıkların Kontrolü Ofisi (OFAC) tarafından yapılan basın açıklaması ekte sunulmuştur.”

“OFAC açıklamasında özetle, anılan kararla 700'ün üzerinde gerçek ve tüzel kişinin (deniz ve hava araçları dahil olmak üzere) yaptırıma tabi tutulduğu, söz konusu yaptırımların İran halkını değil İran rejimini hedef aldığı, bu çerçevede, tarım ürünleri, gıda, ilaç ve tıbbi cihazların İran'a satışını mümkün kılacak yetkilendirme ve istisnaların verilmeye devam edileceği belirtilmektedir.”

“Yaptırım kararıyla 50 İran bankası, İran İslam Cumhuriyeti Denizcilik Hatları (Islamic Republic of Iran Shipping Lines) ve İran Ulusal Petrol Nakliyat Şirketi (National Iranian Tanker Company) başta olmak üzere deniz taşımacılığı alanında faaliyet gösteren önemli sayıda kurum ve şirket ile bunların araçları, İran Atom Enerji Örgütü ve İran'ın ulusal havayolu şirketi olan “İran Havayolları” (şirkete ait 67 uçak dahil) hakkında yaptırım kararı alındığı kaydedilmektedir.”

“Açıklamada, haklarında yaptırım kararı alınan gerçek ve tüzel kişilerin ABD'de ya da ABD'lilerin kontrolü veya zilyetliğinde bulunan varlıklarının ve bunlardaki hisselerinin dondurulduğu, ABD uyrukluların bu gerçek ve tüzel kişilerle iş yapmalarının yasaklandığı, yaptırıma tabi söz konusu gerçek ve tüzel kişilerle iş ilişkisine girenlerin haklarında dava açılabilmesi ve yaptırımlara maruz kalabilecekleri ifade edilmektedir.”

“Bahsekonu kararla yaptırıma tabi tutulan gerçek ve tüzel kişilerin (deniz ve hava araçları dahil olmak üzere) tam listesine aşağıdaki bağlantıdan ulaşılabilir: [https://www.treasury.gov/resource-center/sanctions/OFAC-Enforcement/Pages/20181105\\_names.aspx](https://www.treasury.gov/resource-center/sanctions/OFAC-Enforcement/Pages/20181105_names.aspx)”

“ABD Dışışleri Bakanı Michael Pompeo ile Hazine Bakanı Steven Mnuchin’in konuya ilişkin olarak dün düzenledikleri ortak basın toplantısının tutanağı istifadeleri için keza ekte takdim kılınmıştır.”

Bilgilerini ve konunun ilgili üyelerinize uygun bir şekilde duyurulmasını rica ederim.

Saygılarımla,

  
Mustafa SARACÖZ  
Genel Sekreter

**EKLER:**

1-OFAC Basın Açıklaması ( 8 syf)

2-Sn.Pompeo-Sn.Munchin Ortak Basın Toplantısı (6 syf)



## PRESS RELEASES

# U.S. Government Fully Re-Imposes Sanctions on the Iranian Regime As Part of Unprecedented U.S. Economic Pressure Campaign

November 5, 2018

**WASHINGTON** – Today, in its largest ever single-day action targeting the Iranian regime, the U.S. Department of the Treasury’s Office of Foreign Assets Control (OFAC) sanctioned more than 700 individuals, entities, aircraft, and vessels. This action is a critical part of the re-imposition of the remaining U.S. nuclear-related sanctions that were lifted or waived in connection with the Joint Comprehensive Plan of Action (JCPOA). OFAC’s action is designed to disrupt the Iranian regime’s ability to fund its broad range of malign activities, and places unprecedented financial pressure on the Iranian regime to negotiate a comprehensive deal that will permanently prevent Iran from acquiring a nuclear weapon, cease Iran’s development of ballistic missiles, and end Iran’s broad range of malign activities. This brings to more than 900 the number of Iran-related targets sanctioned under this Administration in less than two years, marking the highest-ever level of U.S. economic pressure on Iran.

“Treasury’s imposition of unprecedented financial pressure on Iran should make clear to the Iranian regime that they will face mounting financial isolation and economic stagnation until they fundamentally change their destabilizing behavior. Iran’s leaders must cease support for terrorism, stop proliferating ballistic missiles, end destructive regional activities, and abandon their nuclear ambitions immediately if they seek a path to sanctions relief,” said Treasury Secretary Steven Mnuchin. “The maximum pressure exerted by the United States is only going to mount from here. We are intent on making sure the Iranian regime stops siphoning its hard currency reserves into corrupt investments and the hands of terrorists.”

Today’s action includes the designation of 50 Iranian banks and their foreign and domestic subsidiaries; the identification of more than 400 targets, including over 200 persons and vessels in Iran’s shipping and energy sectors, and an Iranian airline and more than 65 of its aircraft; and the placement on the list of Specially Designated Nationals and Blocked Persons (“SDN List”) of nearly 250 persons and associated blocked property that appeared until today on the List of Persons Identified as Blocked Solely Pursuant to Executive Order (E.O.) 13599 (“E.O. 13599 List”). OFAC has deleted the E.O. 13599 List as part of the cessation of the United States’ participation in the JCPOA. For a complete list of targets sanctioned today, please click [here](#).



Today marks the largest single-day OFAC action targeting the Iranian regime's abuse of Iran's banking sector to fund its destabilizing activities. For example, the Iranian regime has funneled the equivalent of billions of dollars for the Islamic Revolutionary Guard Corps-Qods Force (IRGC-QF) through the banking sector. The action targets, in particular, Iranian banks that have provided support to, or are owned or controlled by, persons designated in connection with the Iranian regime's support to international terrorism, proliferation of weapons of mass destruction (WMD) or their means of delivery, and human rights abuses. Some of the banks designated today have served as financial conduits for the IRGC-QF, the Ministry of Defense and Armed Forces Logistics (MODAFL), the Islamic Republic of Iran Broadcasting (IRIB), the Martyrs Foundation, Mahan Air, and Iran's Law Enforcement Forces (LEF) — all entities that remained designated throughout the JCPOA.

"As the Iranian people suffer from fiscal mismanagement and a plummeting rial, the Iranian regime abuses the country's banking system to enrich its elite and finance repressive state institutions. The IRGC and other destabilizing entities leverage their access to the global financial system to fund proxies fighting in Syria, Iraq, and Yemen, subsidize the proliferation of WMD or their means of delivery, and arm those who abuse the human rights of Iranian citizens," said Treasury Under Secretary Sigal Mandelker. "This action is aimed at cutting off Iranian banks that facilitate Iran's domestic repression and foreign adventurism from the international financial system, and will highlight for the world the true nature of the regime's abuse of its domestic banking system."

Today, more than 70 Iran-linked financial institutions and their foreign and domestic subsidiaries were designated or identified and placed on the SDN List.

Bank Melli is being designated pursuant to E.O. 13224 for assisting in, sponsoring, or providing financial, material, or technological support for, or financial or other services to or in support of, the IRGC-QF, which was previously designated pursuant to E.O. 13224 on October 25, 2007. As of 2018, the equivalent of billions of dollars in funds have flowed through IRGC-QF controlled accounts at Bank Melli. Bank Melli has acted as a conduit for payments to the IRGC-QF. The IRGC-QF has used Bank Melli to dispense funds to Iraqi Shia militant groups, and Bank Melli's presence in Iraq was part of this scheme. Since the mid-2000s, Bank Melli increasingly provided services to Iranian military-related entities as they became further involved in all aspects of the Iranian economy. Bank Melli has enabled the IRGC and its affiliates to move funds inside and outside of Iran. The IRGC was designated pursuant to E.O. 13224 on October 13, 2017.

Bank Melli has also provided financial services to MODAFL, which was designated pursuant to E.O. 13382 on October 25, 2007.

Arian Bank, a Bank Melli subsidiary, is being designated pursuant to E.O. 13224 for being owned or controlled by Bank Melli.

services in support of, Bank Sepah. As recently as 2018, EIH maintained active account services for Bank Sepah, including processing the equivalent of millions of dollars' worth of euro payments in support of Bank Sepah.

Post Bank of Iran is being designated pursuant to E.O. 13382 for having provided, or attempted to provide, financial, material, technological, or other support for, or goods or services in support of, Bank Sepah. As recently as 2018, Post Bank of Iran engaged in the exchange of Iranian rials for euros for the benefit of Bank Sepah through active euro accounts.

Bank Tejarat is being designated pursuant to E.O. 13382 for having provided, or attempted to provide, financial, material, technological, or other support for, or goods or services in support of, Bank Sepah. As recently as 2018, Bank Tejarat provided critical financial services for Bank Sepah. Bank Tejarat also is being designated pursuant to E.O. 13224 for assisting in, sponsoring, or providing financial, material, or technological support for, or financial or other services to or in support of, Mahan Air, a designated Iranian airline that provides transportation, funds transfers, and personnel travel services to the IRGC-QF. Mahan Air was designated pursuant to E.O. 13224 on October 12, 2011. Belarus-based Trade Capital Bank (TC Bank) is being designated pursuant to E.O. 13382 and E.O. 13224 for being owned or controlled by Bank Tejarat.

Ayandeh Bank is being designated pursuant to E.O. 13846 and the Iran Threat Reduction Act of 2012 for having materially assisted, sponsored, or provided financial, material, or technological support for, or goods or services to or in support of, IRIB, Iran's state-media apparatus that routinely broadcasts false news reports and propaganda, including forced confessions of political detainees. IRIB was designated pursuant to E.O. 13628 in February 2013 for restricting or denying the free flow of information to or from the Iranian people. IRIB was implicated in censoring multiple media outlets and airing forced confessions from political detainees.

Day Bank is being designated pursuant to E.O. 13224 for being owned or controlled by, and for assisting in, sponsoring, or providing financial, material, or technological support for, or financial or other services to or in support of, Martyrs Foundation, an Iranian parastatal organization that channels financial support from Iran to several terrorist organizations in the Levant, including Hizballah, Hamas, and the Palestinian Islamic Jihad (PIJ). The Martyrs Foundation, which was designated pursuant to E.O. 13224 in July 2007, has established branches in Lebanon staffed by leaders and members of terrorist groups to serve the families of killed or imprisoned Hizballah and PIJ members. Day Bank provides significant financial support and banking services to the Martyrs Foundation.

Additionally, 14 entities are being designated pursuant to E.O. 13224 for being owned or controlled by Day Bank. These 14 subsidiaries, which engage in a wide range of business activities across different Iranian economic sectors, are Atieh Sazan Day,



The Iranian shipping industry is reviving previously employed deceptive practices in an effort to obfuscate IRISL or NITC's interests in vessels and other property. Among the IRISL vessels identified today are four vessels that recently underwent name and partial ownership changes but that are still property in which IRISL has a blockable interest. The global maritime industry should be on alert for Iran's use of such tactics and make every effort to thwart Iran's use of their jurisdictions to create front companies; to revoke their flags from IRISL and NITC vessels; and to deny other means that enable Iran to conceal its interest in the vessels. For additional information related to Iran's deceptive practices, please click [here](#) for FinCEN's recent Iran Advisory.

## **ATOMIC ENERGY ORGANIZATION OF IRAN**

Today, OFAC added to the SDN List the Atomic Energy Organization of Iran (AEOI) as well as 23 AEOI subsidiaries and associated individuals, and identified them as meeting the definition of the term "Government of Iran" pursuant to E.O. 13599 and section 560.211 of the ITSR. AEOI has operational and regulatory control over Iran's nuclear program and bears responsibility for nuclear research and development.

Additionally, OFAC designated Morteza Ahmadali Behzad pursuant to E.O. 13382 for acting or purporting to act for or on behalf of, directly or indirectly, Pishro Company. Pishro Company, which is responsible for research and development efforts across Iran's nuclear program, was designated pursuant to E.O. 13382 on May 9, 2013.

## **AVIATION**

Today OFAC identified Iran Air, the national airline of Iran, pursuant to E.O. 13599 for being owned or controlled by the Government of Iran. OFAC also added to the SDN List 67 aircraft operated by Iran Air.

## **SANCTIONS IMPLICATIONS**

As a result of today's action, all property and interests in property of these targets that are in the United States or in the possession or control of U.S. persons must be blocked and reported to OFAC. OFAC's regulations generally prohibit all dealings by U.S. persons or within the United States (including transactions transiting the United States) that involve any property or interests in property of blocked or designated persons.

In addition, persons that engage in certain transactions with the entities designated and identified today may themselves be exposed to enforcement action, designation, or blocking sanctions. Furthermore, unless an exception applies, any foreign financial institution that knowingly facilitates a significant transaction for any of the entities designated today or for certain other Iranian persons on the SDN List (other than

## **Secretary of State Mike Pompeo and Secretary of the Treasury Steve Mnuchin hold a news briefing on Iran Sanctions**

**Participants: Secretary of State Mike Pompeo; Secretary of the Treasury Steve Mnuchin; Robert Palladino, State Department deputy spokesperson**

**Time: 8:15 am EST, Date: Monday, November 5th, 2018**

**PALLADINO:** Good morning, everyone, and welcome to the Foreign Press Center. We are pleased to have with us this morning Secretary Pompeo and Secretary Mnuchin. They'll both have some opening remarks, and then hopefully, we'll have time for one or two questions afterwards.

Secretary Pompeo?

**POMPEO:** Robert, thank you.

Good morning, everyone. It's a -- it's great to be here at the Foreign Press Center. It's great to see you all.

In May of this year, after President Trump withdrew from the nuclear deal, the Trump administration announced a new strategy to fundamentally alter the behavior of the Islamic Republic of Iran's leadership. At the center of this effort -- and there are multiple lines of effort, but at the center of it is an unprecedented campaign of economic pressure. Our objective is to starve the Iranian regime of the revenue it uses to fund violent and destabilizing activities throughout the Middle East and, indeed, around the world.

Our ultimate goal is to convince the regime to abandon its current revolutionary course. Just look at what happened last week: Denmark announced it had uncovered an Iranian regime assassination plot on its own soil.

The Iranian regime has a choice: It can either do a 180-degree turn from its outlaw course of action and act like a normal country, or it can see its economy crumble. **POMPEO:** We hope a new agreement with Iran is possible, but until Iran makes changes in the 12 ways that I listed in May, we will be relentless in exerting pressure on the regime.

As a reflection of that resolve, today we're reimposing all sanctions that were previously lifted under the nuclear deal. This includes sanctions on energy, banking, shipping and shipbuilding industries.

Since the Trump administration came into office we've done 19 rounds of sanctions targeting 168 Iranian entities. Today's sanctions will accelerate the rapid decline of international economic activity in Iran since the implementation of our strategy in May.

Since that time -- since back in May, over 100 companies have withdrawn from Iran or canceled plans to do business there.



sectors.MNUCHIN: The Iranian regime has funneled billions of dollars for the Islamic Revolutionary Guard Corps force -- through the banking sector. Today's designation includes 50 Iranian banks and their foreign and domestic subsidiaries, in conjunction with Iran's regime support for international terrorism, proliferation of mass destruction or their means of delivery, and human rights abuses.

Our actions include the identification of more than 400 targets, including over 200 persons and vessels in Iran's shipping and energy sector; Iran Air, the national airline of Iran, and more than 65 aircraft; the placement of nearly 250 persons in associate block properties on the Specially Designated Nationals List; the Atomic Energy Organization of Iran.

Over the last five months, Treasury has implemented some of the most impactful sanctions ever seen. Combined with the previous actions, more than 900 Iran-related targets have been sanctioned under this administration in less than two years, marking the highest-ever level of U.S. economic pressure on Iran.

We are making it abundantly clear to the Iranian regime that they will face mounting financial isolation until they fundamentally change their destabilizing behavior.

Iran's leaders must cease support for terrorism and end destructive regional activities immediately. They must stop ballistic missiles and abandon their nuclear ambitions if they seek a path to sanctions relief.

We are watching the Iranian regime with laser focus. If they try to evade our sanctions, we will take actions to obstruct their activity time and time again.

The maximum pressure exerted by the United States is only going to mount from here. Companies around the world need to know we will be strictly enforcing our sanctions.

Thank you.

**PALLADINO:** That will allow time for a few questions.

Let's go to Sky News, Cordelia Lynch.

**QUESTION:** Hello, this is a question for Secretary Pompeo.

The president invoked "Game of Thrones" when he was discussing sanctions. Do you think that was appropriate?

**POMPEO:** This administration has been consistent from, frankly, President Trump's campaign to the first day he was inaugurated about our intention.

We understand that the Islamic Republic of Iran presents a threat to the United States of America and we are determined to stop it.

And, you know, much has been made about this "Game of Thrones," Qasem Soleimani responded and I haven't seen any of you comment on that. This is a man

You talk about the destabilizing behavior of Iran in the region. How does that differ from the behavior of Saudi Arabia?

**POMPEO:** So let me just go through the list: underwriting Lebanese Hezbollah, that presents a threat to the United States of America and to Israel; underwriting the Houthis in Yemen, causing an enormous conflict to take place there in that country; the efforts in Iraq to undermine the Iraqi government, funding Shia militias that are not in the best interest of the Iraqi people; their efforts in Syria. The -- the list goes on.

The difference in behavior between those two countries is remarkable.

Since we've taken office, the -- the Kingdom of Saudi Arabia has been very supportive of our efforts on counterterrorism. They have assisted us. I know Secretary Mnuchin has worked with them on a couple of projects, as well.

It is completely clear: The Islamic Republic of Iran is the destabilizing force in the Middle East today.

So you want to add to that?

**MNUCHIN:** No, I think it's well-said.

**PALLADINO:** Last question's for (ph) TASS, Dmitry Kirsanov.

**QUESTION:** Thank you, gentlemen. Thanks a lot for coming over to brief us.

For Secretary Pompeo, sir, you mentioned that three waivers had been issued for the civilian nuclear energy project. Would you clarify what those are? And Bushehr Nuclear Power Plant, will it be the one under the waiver?

Thank you.

**POMPEO:** Thank you. That's a great question.

It's a pretty complicated area, the non-proliferation issue. There are three; Bushehr is one of the three. But if I may, we will get out a full fact sheet on that here in the next hour or so that you will all be able to see.

What we have authorized is very narrow, very limited, very time-limited as well, but important nonetheless that these non-proliferation projects are not things that are taking place without some ability to see what's going on. And we'll -- we'll give you the full details of the scope of those waivers.

**PALLADINO:** All right. We -- we have one time for -- this is the last one. Let's go right to the front, right here, please.

**QUESTION:** Rohrs Dalla (ph) with Rodal TV (ph) in Iraqi Kurdistan.

Mr. Secretary, Iran has very powerful hands in Iraq. Are you not concerned that with