



H.E. Kamikawa Yoko
Minister for Foreign Affairs
2-2-1 Kasumigaseki
Chiyoda-ku, Tokyo
100-8919, Japan

RE: Iran's Actions Require Strict Sanctions and Designating IRGC as a Terrorist Organisation

Your Excellency:

By way of introduction, the European Centre for Law and Justice (ECLJ) is a non-profit organisation located in Strasbourg, France, dedicated to protecting human rights and religious freedom in Europe and around the world. The ECLJ also holds Special Consultative Status with the United Nations ECOSOC.

There can be no doubt that Iran has funded and is funding terror across the globe, but nowhere as evident as Israel. Although Israel defends its civilian population and territorial integrity from terrorist organisations in the Gaza Strip, Syria, Yemen, Lebanon, and elsewhere, former Israeli Prime Minister Bennett was correct in stating that the head of this “octopus of terror” lies in Iran. However, Iran has now directly acted on its expressed intent to destroy Israel by personally launching over three hundred drones and cruise and ballistic missiles at Israel.

Despite the fact that Iran violated Article 2(4) of the United Nations Charter, Iran erroneously claims its act of aggression as an act of self-defence carried out in response to the alleged Israeli bombing of Iran’s diplomatic building in Syria. Notably, Iran has used Hezbollah and other armed groups in Syria to launch attacks against Israel for years with impunity.

It is well known that the Islamic Revolutionary Guard Corps (IRGC) “trains, funds, arms, and shares intelligence with dangerous proxy forces throughout the Middle East and abroad.”¹ A network of these terrorist organisations—Hezbollah, Kata’ib Hezbollah, Hamas, Palestinian Islamic Jihad (PIJ), and the Houthis—is spread across several countries. All of them are actively engaged in an armed conflict with Israel, continuously and indiscriminately attacking Israeli civilian population centres. Since 7 October 2023, with continued Iranian funding and support, these terrorist organisations have renewed their unprovoked attacks against Israel.

¹ H.R. 288, 118th Cong. (2023), <https://www.congress.gov/118/bills/hres288/BILLS-118hres288ih.pdf>.

Hossein Salami, the commander in chief of the IRGC, praised Hamas' 7 October 2023, attack on Israel as an "amazing victory."² He also stated that "the condition for divine victory is for us to simply be present on the battlefield" because "America will not be able to keep the Zionist regime on life support."³ He further stated that "Gaza is today the grave of America and the Zionist regime."⁴

In a speech to pro-Houthi media, Amir Ali Hajizadeh, Commander of the IRGC's Aerospace Forces, used genocidal language when he called on Islamists to "unite to expel 'Zionists' and Americans" from the region.⁵ He was also behind the January 2024 "ballistic missile attack on US forces at Ayn al-Assad base in Iraq."⁶ Ali Fadavi, Deputy Commander of the IRGC, cheered on the 7 October attacks, and also used genocidal language when he called Israel a "cancerous growth [that needs to] disappear[] from the map of the world."⁷

In addition to supporting terrorist groups in the Middle East, the IRGC also supports President Vladimir Putin's illegal war against Ukraine by providing lethal war material.⁸ The IRGC Quds Force is suspected of carrying out "assassinations in the Netherlands, Sweden, Denmark, France, Germany, Bulgaria, and Cyprus."⁹ Some of these countries have "either arrested or expelled Iranian Government officials implicated in terrorist or assassination plots."¹⁰

It is time for the international community to unite against Iran, a terrorist State, and all of its terrorist proxies, including the IRGC.

United Nations Security Council (UNSC) resolutions require targeted financial and other sanctions against entities that sponsor terrorism. The Financial Action Task Force (FATF) has blacklisted Iran over serious concerns regarding terrorist and proliferation financing. FATF states that, "given Iran's failure to enact the Palermo and Terrorist Financing Conventions in line with the FATF Standards, the FATF fully lifts the suspension of counter-measures and calls on its members and urges all jurisdictions to apply effective counter-measures" against Iran.¹¹ It further states that "Iran will remain on the FATF statement on High Risk Jurisdictions Subject to a Call for Action until the full Action Plan has been completed."¹²

The United States designated the IRGC as a terrorist organisation in 2019 and has imposed different levels of sanctions on Iran over the years. The European Parliament is also considering

² N. Katirachi & A. Savyon, *Iranian Regime Officials Praise Iran's Proxies in the Palestinian Resistance and the October 7 Massacres, Call for Eradication of Israel*, MEMRI (Dec. 1, 2023), <https://www.memri.org/reports/iranian-regime-officials-praise-irans-proxies-palestinian-resistance-and-october-7-massacres>.

³ *Id.*

⁴ *Id.*

⁵ Seth J. Frantzman, *Iran's Hajizadeh: We Must Unite to Expel the Zionists and Americans*, JERUSALEM POST (Feb. 15, 2020), <https://www.jpost.com/middle-east/irans-hajizadeh-we-must-unite-to-expel-the-zionists-and-americans-617650>.

⁶ *Id.*

⁷ Katirachi & Savyon, *supra* note 2.

⁸ H.R. 288, *supra* note 1.

⁹ *Id.*

¹⁰ *Id.*

¹¹ *High-Risk Jurisdictions Subject To A Call for Action – October 2023*, FINANCIAL ACTION TASK FORCE, <https://www.fatf-gafi.org/en/publications/High-risk-and-other-monitored-jurisdictions/Call-for-action-october-2023.html> (last visited Apr. 17, 2024).

¹² *Id.*

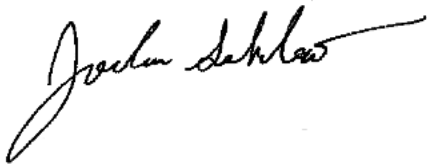
designating the IRGC as a terrorist organisation. Until Iran faces such measures, it will continue to support acts of terrorism not only in the Middle East but also around the world.

Sanctioning Iran is not a new concept, but an effective one. Many countries have sanctioned Iran over the years for a myriad number of reasons and, in fact, the EU and US are currently considering adding more sanctions regarding Iran's attack on Israel.

As you know, Security Council Resolution 1373 condemned terrorist attacks, reaffirmed the inherent right to self-defence, and required that all Member States "prevent and suppress the financing of terrorist acts," as well as freeze funds and other financial assets or economic resources, to anyone who participates, or facilitates terrorist acts.

We, therefore, encourage every Member State to comply with these requirements and act swiftly in response not only to Iran's funding of terror but its direct attack on Israel.

Respectfully submitted,



Jordan Sekulow
Chief Counsel



CeCe Heil
Senior Counsel



Shaheryar Gill
Senior Counsel