



Iranian Aggression & Bad Actions Since the JCPOA

Despite predictions that the JCPOA would moderate Iran, since 07/14/15, Tehran has increased its violations of international law, acts of military & terroristic aggression, and destabilized (and here) and ignited an arms race in the Middle East. It plans to boost its weaponry. Iran is not even in compliance with the deal.

Known or Possible Iranian Violations of the JCPOA¹

- Prior to the deal, Iran refused to cooperate with the International Atomic Energy Agency (IAEA) investigating its Possible Military Dimensions (PMD). Iran only enabled the IAEA to draw partial conclusions on 2 of the 12 elements. In 5 cases, the IAEA noted that PMD occurred despite Iran's claims.
 - "Iran has demanded that the international community "close the file" on PMDs. Iran also has prevented the IAEA from interviewing key personnel in charge of PMD activities."
 - There was little new information in the Dec. IAEA report.
 - The Obama administration concluded that uranium particles discovered at Parchin likely were tied to the country's covert nuclear weapons program. This contradicts Iran's claims.
- Post-deal, Iran refused to cooperate with the IAEA. Each of the 8 quarterly IAEA reports issued since the JCPOA's implementation has lacked information that would enable independent assessments of Iranian compliance, raising concern that the agency seeks to conceal. None of the reports states that Iran has complied with the JCPOA. Rather, as the JCPOA notes, the IAEA's mandate primarily entails monitoring and reporting on Tehran's nuclear-related actions (or lack thereof) pursuant to the JCPOA's provisions.
 - The Aug. 31 IAEA report omitted – among other data – information on centrifuge production, centrifuge R&D activities, the quantity of heavy water stored in Oman, & nuclear weaponization issues.
 - The Institute for Science and International Security (ISIS) reported there are at least eight key pieces of information missing from the IAEA report, and "(w)ithout this information, an independent determination of whether Iran is complying with the JCPOA is not possible."
 - The missing information detailed in the ISIS report:
 - The amount of Low Enriched Uranium (LEU) in Iran, as well as how much has been sent out, diluted and produced. LEU can be enriched to make weapons-grade uranium or enriched to 3% and used as fuel for certain nuclear reactors.
 - An alleged "secret agreement" that requires Iran to irradiate its 20% LEU. The JCPOA requires Iran's 20% LEU to be placed in a reactor in Tehran.
 - How many centrifuges are operating in Iran's Natanz nuclear facility.
 - Certain information on Iran's Fordow facility. Per JCPOA provisions, all centrifuges at Fordow are supposed to be removed, while the facility is to be converted into a "research center."
 - A shipment of Iranian heavy water went to Oman. Heavy water is a key component in the production of plutonium; plutonium can in turn be utilized in nuclear weapons. Under the JCPOA, Iran is permitted to have no more than 130 metric tons. The state of ownership of the heavy water in Oman was crucial to ensuring Iran's JCPOA compliance.
 - Iran's research into advanced centrifuges has been within compliance, but little information is provided as to which models, or how many, are in production. This information is crucial due to the fact that certain models of Iranian centrifuges are more powerful than older models, meaning Iran could make a significant leap forward in its nuclear development should the country cheat.
 - There is a lack of clarity in the IAEA report regarding Iran's nuclear weaponization research, particularly at Parchin, which was believed to have been involved in explosive tests.

¹ The Iranian parliament rejected the text of the JCPOA. The majlis approved their own version of the JCPOA, which may be more than 1000 pages long, which is very different. Leader Khamenei has endorsed this new version of the JCPOA. Hence, there is no real deal.

- The IAEA is not involved in the Procurement Working Group, which is responsible for any nuclear related transfers of technology and resources that could be used for nuclear weapons.
- Iran continues to produce excess heavy water at Arak in violation of the JCPOA.
 - The U.S. and Russia bought the excess heavy water, which subsidizes the Iranian nuclear program, and will indirectly support terrorism. The U.S. wired \$8.6 million for 32 metric tons.
 - Iran is storing the excess heavy water in Oman, which is not being sold.
 - Mark Dubowitz, of the Foundation for Defense of Democracies, has explained: “These U.S. subsidies will help Tehran perfect its heavy water production skills so it will be fully prepared to develop its plutonium bomb-making capabilities when restrictions on the program sunset ...”
 - ISIS has written: “The Department of Energy did not need to purchase the heavy water from Iran and could have bought it from India, Argentina, or Canada. Because DOE’s current needs for the heavy water are relatively modest, most of the recent purchase is being considered for sale to private industry. However, in addition to the negative security implications, the US purchase of the heavy water from Iran threatens the development of a reliable North American supply chain of heavy water.”
- Iran is not allowing for international inspections of military sites. Iranian officials had said Tehran would not allow international inspectors to enter military sites, in comments that contradicted JCPOA language. Parchin is one such site, which was inspected once under only special, restricted, circumstances. In 2017, Velayati, a senior adviser to Leader Khamenei, reiterated, “Under no circumstances are the Americans allowed to inspect Iran’s military sites.” He has repeated this. Salehi, the head of the Atomic Energy Organization of Iran, has claimed that there are no provisions within the JCPOA or in the Additional Protocol to obligate Iran to permit inspection of its military sites. Both the IAEA and Olli Heinonen acknowledge that there have been no inspections. The Russians are helping to block inspections.
- Iran exceeded the limits on advanced centrifuge research and development by building (IR-8) and operating (IR-6) larger numbers of advanced centrifuges than is allowed. It assembled more than a half dozen IR-8 rotor assemblies in Tehran. It operated 13-15 IR-6 centrifuges in a single cascade.
- Iran is continuing to produce uranium enriched to 5% beyond the quantity permitted it. Two such violations have been recorded by the IAEA. Iran has exported the surplus for storage in Oman, in a procedure that does not exist in the agreement and is not allowed.
- German intelligence has reported that Iran, in 2015 and 2016, attempted more than one hundred times to obtain illicit technology that could be used for military nuclear and ballistic missile programs. The new revelations undercut the German government’s contention that Iran has reversed its policy to develop a nuclear weapons device. More information is here and here and here and here as well.
- The ISIS has learned that Iran made an attempt to purchase tons of controlled carbon fiber. This attempt occurred after Implementation Day. This attempt raises concerns over whether Iran intends to abide by its commitments, as Iran may seek to stockpile the carbon fiber to be able to build advanced centrifuge rotors beyond its current needs, allowing it to quickly build an advanced centrifuge enrichment plant if it chooses to leave or disregard the JCPOA during the next few years.
- “The JCPOA’s limit of 300 kilograms of low-enriched uranium (LEU) was calculated to put Iran’s breakout time at one year. However, as Russia has acknowledged, there is excess LEU in Iran above the 300 kilograms allowed by the nuclear deal. Breakout time diminishes if Tehran is allowed to continue to grow its LEU stock further, such as by keeping part of its stockpile overseas (as it did recently with heavy water in Oman). Unless sold or transferred in ownership, the LEU remains part of Iran’s nuclear material inventory. At current production rates of around 100 kilograms of additional LEU per month, even without installing any additional centrifuges, Tehran’s breakout time will be reduced to half a year within just a few months – far below the U.S. administration’s promised one-year breakout time.”
- The Exemptions & Loopholes: The ISIS has reported that the West agreed “in secret” to allow Iran to evade some restrictions on low-enriched uranium (LEU) in the nuclear deal to meet the nuclear deadline. If these exemptions were not allowed, Iran would not have been in compliance by the Jan. 16 deadline.
 - ISIS noted that the LEU could be processed into weapons-grade material, so the secret side deal makes it effectively impossible to know how much bomb material Iran could produce, on fairly short notice.
 - The exemptions & loopholes:

- Iran has an exemption for reactor-grade enriched UF6 (uranium hexafluoride, the feed material for enrichment centrifuges) in the form of low-level and sludge waste. This may have been a minor violation although the report said the amount of this material is unknown.
 - Ignoring “lab contaminant” UF6 enriched to 20% uranium-235 judged as “unrecoverable.” Although this may also be a minor violation, the report says the amount of this material and how it was judged unrecoverable is not known.
 - Iran was allowed to maintain 22 large - more than six cubic meters - radiation containment chambers, or hot cells. They were not supposed to go above six cubic meters. These hot cells are supposed to be used for producing medical isotopes but can be “misused for secret, mostly small-scale plutonium separation efforts.” Plutonium-separation experiments have only one purpose: developing the capability to produce plutonium nuclear-weapons fuel.
 - There is a loophole on a 130-ton cap for Iran’s heavy-water stockpile by allowing Tehran to store large amounts of heavy water in Oman that remain under Iran’s control.
 - The Commission established a technical working group to evaluate a small amount of enriched uranium remaining in the equipment of a nuclear plant. The ISIS said it is unknown whether the working group will give Iran an exemption for this enriched uranium.
- Albright, who was a co-author on the report, said the exemptions have been kept secret from the public, and were not disclosed to Congress until after they were granted to Iran.
- These exemptions are not temporary. Instead the ISIS confirmed the U.S. and its partners are right now considering whether to lock in the past exemptions and create new ones.
- Iran is **violating** the 5 year arms embargo (UNSCR 2231). 2231 requires prior approval by the Security Council for any arms transfer to or from Iran, and thus, allows the U.S. to block sales.²
 - Iran has bought \$8 billion in weapons from Russia, including the S-300 missile defense system, fighter jets and military helicopters. They may buy \$10 billion more.
 - Iran has exported weapons and aid to Syria, to Yemen (including missiles), to Kuwait, and to Bahrain.
 - A July 2016 report by the UN says that Iranian firms participated in a defense trade show in Iraq in 2015, in potential violation of UNSC 2231. No prior approval from the Security Council was sought. One of the firms, the Defense Industries Organization (DIO), is on the UN’s blacklist.
 - The UN has “expressed concern” that Iran may have violated an arms embargo by supplying weapons and missiles to Hezbollah. A German report has criticized them and Russia.
- Iran ordered its scientists to start developing systems for nuclear-powered vessels in response to what it calls a U.S. violation of the JCPOA (the reauthorization of the Iran Sanctions Act). Iran’s move, if carried out, would probably require Iran to enrich uranium to a fissile purity above the level set in the nuclear deal.
- It is alleged that Iran is doing engineering and weaponization testing at a military complex near Parchin.
- Iran is **most likely violating** Section T of the deal, which explicitly bans Iran from “activities which could contribute to the development of a nuclear explosive device”. It lists examples such as using computer models that simulate a nuclear bomb, or designing multi-point, explosive detonation systems. The IAEA has admitted that it has not been able to verify Iran is implementing Section T because the relevant activities would be occurring on military sites and Iran has barred the IAEA from inspecting those sites.
- Peter Vincent Pry, executive director for a Congressional Advisory Board, has pointed to unclassified satellite imagery showing an Iranian military base with four high-energy power lines carrying about 750,000 volts each, running underground into a facility to which the IAEA has no access. Pry suggested that Iran is using those lines to power uranium centrifuges that have not been declared to the international community.
- According to Ali Akbar Salehi, head of the Atomic Energy Organization Of Iran, Iran never dismantled the core of the plutonium reactor at Arak, saying that Iran needed it for research. He also said that only the external pipelines of the reactor had been filled with cement, and it could be easily reactivated. According to the ISIS, Iran has also tried to make changes to the fuel design for the modified Arak reactor, that differ from what the JCPOA requires.

² In addition to there being no real deal, Iran has announced that it considers the UNSCR 2231 as separate from the JCPOA, and that is has “no intention” of abiding by the UN prohibitions on developing ballistic missiles or purchasing arms.

Other Iranian Bad Behavior

- Iran is aggressive in the Persian Gulf. U.S. forces operating in and around the Strait of Hormuz are “approached by Iranian warships and aircraft” on a “nearly daily basis,” according to a Pentagon official. This has happened 35 times in 2016, double the amount from the same period in 2015. And now in 2017.
 - U.S. Navy ships fired warning shots and had interactions with Iranian vessels in 2017.
 - The Islamic Revolutionary Guards Corps (IRGC) threatened to “drown” any U.S. warships approaching Iran. “We have informed Americans that their presence in the Persian Gulf is an absolute evil,” Rear Admiral Fadavi stated. “Americans are aware that Iran would destroy their warships if they take a wrong measure in the region.”
 - The navy of Iran’s IRGC fired several rockets near a U.S. aircraft carrier and a destroyer. The Navy described Iran’s move as “highly provocative.”
 - Iran violated international law by grabbing two U.S. Navy ships and ten sailors until releasing them the next day. The sailors surrendered to protect the Iran nuclear deal. Iran’s army chief said the seizure should be considered a lesson to Congress trying to impose new sanctions. While in custody the sailors were, intimidated, humiliated and made to “apologize.” Iran has bragged that it (illegally) extracted a lot of information from the confiscated phones and laptops and that it has humiliating films. It has released some embarrassing pictures.
 - Iranian ships threatened a U.S. helicopter and ships in “unsafe and unprofessional” incidents.
 - Iran has claimed that it has seized more American Naval personnel.
- Iran has violated UN Resolution 1929 and the “spirit of UNSCR 2231” by testing as many as 14 ballistic missiles.³ This includes testing intermediate and long-range ballistic missiles, which “only make economic, political, and military sense in the broader context of an ambition to become a nuclear weapons power.”
 - Iran twice violated the UN ballistic missile testing restrictions on it prior to Implementation day.
 - Iran vowed to expand and enhance its missiles and is doing so increasingly.
 - Iran already revealed a new underground missile depot, a Syrian rocket site, and a new missile line.
 - Iran possesses cruise missiles capable of delivering a nuclear warhead. On March 8 and 9, 2016, Iran conducted multiple missile tests, and called the U.S. the “main enemy”. The missiles had printed on them the slogan “Israel must be wiped out.”
 - On July 12, 2016, Iran conducted a new missile test right before the anniversary of the JCPOA.
 - Iran tested space rockets that could also be used for ballistic missiles. See here and here and here.
 - Iran claims it test-fired a missile with a range of 2,000 kilometers, able to hit Israel.
 - In 2017, Iran launched a medium-range ballistic missile in January, and a short-range missile in February, and a medium-range missile in March. The Pentagon and the DNI have acknowledged that Iran is developing more advanced missiles. It has built a new missile factory in Iran and one in Syria.
 - Iran is cooperating with North Korea.
- Iran, through its proxy forces in Yemen, is turning the Bab el-Mandeb waterway into a militarized chokepoint that threatens freedom of navigation. Forty-four IRGC and Hizballah operatives have been killed or captured in Yemen. On October 9 and 12, 2016, Iran supported Yemen’s Shia Houthi rebels fired anti-ship missiles at the destroyer USS Mason, off the coast of Yemen. The missiles failed to hit their target. On October 13, U.S. cruise missile strikes destroyed three Houthi coastal radar installations. The missiles fired by the Houthis were likely supplied by Iran, and the technical expertise necessary to operate and fire them would almost certainly have required Iranian assistance if not control. Iran deployed two warships to the Gulf of Aden in response to the U.S. strikes. Saudi Arabia has been targeted by a total of 80 ballistic missiles fired by the Houthis, and in January of 2017, the Houthis attacked a Saudi frigate off the coast of Yemen, which U.S. defense officials believe it may have been meant for an American warship.
- Iran is also funding and training Shia radical terror groups in Bahrain and Saudi Arabia.
- Iran is the “biggest state sponsor of terrorism” or the “leading sponsor of terrorism.” It is likely Iran spent a portion of the more than \$10 billion in hard assets the U.S. gave it to fund its terror operations and military.

³ The U.S. originally insisted the deal contained “the exact same language” as UN resolution 1929 prohibiting ballistic-missile development. Iran has since revealed a loophole—which it’s been exploiting. The U.S. now says it isn’t a violation.

- It established the al Sabirin terror group in Gaza & the West Bank, with a \$10 million annual budget.
 - Iran funds Hezbollah, annually \$830 million, a huge boost (from \$200 million) after the JCPOA.
 - Iran funds Hamas (annually \$60-70 million) & Palestinian Islamic Jihad (annually \$70 million).
 - Iran has supported the Islamic State (IS) in the Sinai, through its funding of Hamas.
 - Bin Laden described Iran as al Qaeda's "main artery for funds, personnel, and communication" and Iran has continued until recently.
- Iran's 2017 \$19 billion defense budget has dramatically increased from 2016. It has built its own missile defense system and a turbo jet. Iran hopes to revamp its army from top to bottom, including improving logistical capabilities, weaponry, and other armaments. The military budget was boosted from 2% to 5%. Iran decided to raise the Quds Force budget more than \$300 million beyond the budgetary increase earlier granted to the IRGC as a whole. Then, in August of 2017, the IRGC budget and the ballistic missile program was boosted again to more than half a billion dollars.
- Iran gave the \$1.7 billion sent to them by the U.S. to the Iranian military. The IRGC benefitted from it. Iran raised the Quds Force budget more than \$300 million beyond that of the IRGC.
 - This money was given to Iran on January 16, 2016. It was supposedly to settle a lawsuit with Iran. However, it was released the same time the sanctions on Iran were waived and the frozen oil funds were released to Iran, and the exact same time that four American citizen hostages were released by Iran.
 - The entire \$1.7 billion amount was paid in cash - Swiss francs.
 - In 2000, the Clinton administration agreed to pay the \$400 million to Americans who had won judgments against Iran for terror attacks. U.S. officials assured the victims that the Treasury would be reimbursed from the seized Iranian funds. "We all believed that Iran would pay our damages, not U.S. taxpayers," says Stephen Flatow..."now, 15 years later, we find out that they never deducted the money from the account. It makes me nauseous. The Iranians aren't paying a cent."
 - After denying it, the Administration admitted this was a ransom for hostages. Then, they backtracked.
 - Some of this money was passed along to Hezbollah.
- The IRGC is sending assets to infiltrate the U.S. and Europe at the direction of Leader Khamenei. Some of these spies have threatened the international press, including VOA, to ensure positive coverage.
- Iran launched cyber-attacks against the U.S., the UK, and other targets, including once right after the deal.
- The head of Iran's Quds Force, Qassem Soleimani, who is subject to a UN travel ban, has defied this ban multiple times.
- Under President Rouhani, Amnesty International has said that Iran has conducted "a staggering execution spree", murdering so many dissidents that Iran has per capita the highest execution rate in the world.
 - In 2017, Iran has executed at least 247 people.
 - In 2016, Iran executed at least 567 people.
 - In 2015, Iran carried out 1,084 executions, the highest rate of executions Iran in 25 years.
 - In 2014, 753 Iranians were executed, a 12-year high.
 - Child executions have also increased. A majority of those executed are drug sellers or users. Iran executed the entire adult male population of a village for drug offences.
- Iran has escalated its involvement in Syria. Iran has sent more than 50,000-90,000 Shia troops into Syria: 10,000-16,000 Iranians, a majority of which are IRGC, and 1500 of which are part of the Quds force; up to 10,000 fighters from Hezbollah; about 20,000 Iraqi militiamen; 15,000-20,000 Afghans; and 5000-7000 Pakistanis. Iran uses Iran Air, Mahan Air and other "civilian" Iranian airlines for this. Iran pays for and extensively trains these troops.
 - Iran is building a military base in Syria, 31 miles from Israel, and has created a Shia Syrian militia.
 - Iran has helped create an Alawite militia named the National Defense Forces, of up to 100,000 men.
 - Iran has spent possibly as much as \$100 billion on hardware and support for Assad since 2011.
 - Officially, 1000 Shia troops have died. The Washington Institute for Near East Policy center has found that 2,603 Shia have been killed: 1,045 Hezbollah fighters and 1,047 Afghan, Pakistani and other Shi'ite militia fighters – all under Iranian command. 1000 Iranian IRGC troops have died.
 - The U.S. has determined that Iranians are waging "ethnic cleansing" campaigns in the 25% of Syria controlled by Assad to eradicate or send into exile Sunni Muslims and replace them with Shia Muslims.

The Shia Muslims [are coming](#) from Iraq or Lebanon or elsewhere. Iranian-led troops [have been responsible for](#) mass executions, and attacks on civilians, including on women and children.

- Iran is [trying to build](#) “an air base in Syria” and provide additional weaponry to terrorists in Lebanon in an apparent effort to threaten Israel from two directions. This is likely to lead to war.
- Post-deal, Gen. Austin [told](#) Congress, “Iran today is a significant destabilizing force in the region.”
- Iran is [dominating](#) Iraq. It is setting up a land corridor from Iran to Iraq to Syria to Lebanon.
 - The Iranians [control](#), train and support the [100,000 – 120,000 man](#) paramilitary Shia force in Iraq. The IRGC maintains a permanent staff of officers overseeing the process of cooperation with these militias. The force is called the Popular Mobilization Force, known in Arabic as the “[Hashid Shaabi](#)”, made up of two major groups - the Badr organization and the Ktaeb Hezbollah - and other groups.
 - In Iraq, Iran [maintains](#) around 1500 men from the Qods force. Iran [has also shelled](#) the KRG.
 - The Iranians have been involved in [ethnic cleansing in Iraq](#) and have [shelled civilians](#).
- Iran [is supplying funding, weapons, and training](#) to the Taliban in Afghanistan.
- Iran [has arrested](#) and [imprisoned](#) seven U.S. persons, Siamak Namazi, Baquer Namazi, Nizar Zakka (a resident), [Reza “Robin” Shahini](#), [Karan Vafadari](#) (a resident), [an unnamed antique dealer](#), [graduate student Xiyue Wang](#), and (probably) an eighth, [Robert Levinson](#).
 - Shahini [was given](#) an 18 year sentence for “collaboration with a hostile government,” i.e., the U.S.
 - Zakka was given a 10-year sentence for “[spying](#)” for the U.S. Iran [wants money](#) for his release.
 - Iran [sentenced](#) the Namazis to 10 years in prison on charges of cooperating with the U.S.
 - In August of 2016, the State Department [issued](#) a warning urging U.S. citizens to avoid traveling to Iran.
 - *Post* reporter Jason Rezaian [filed](#) a lawsuit against Iran, claiming he was tortured while he was held.
- Iran [announced](#) a blockade of all U.S. goods following an order by Leader Khamenei, and they have [imposed](#) sanctions on 15 U.S. companies, alleging they support terrorism, repression and Israel's occupation of Palestinian land, likely in retaliation for sanctions announced by the U.S.
- Since the nuclear deal, “Tehran … [is seeking](#) Moscow’s help to build another 10 nuclear reactors…”
- Iran [has announced](#) a new Holocaust cartoon contest. The prize is \$50,000.
- Iran [threatened personal harm](#) to the IAEA Director if he revealed the 2 side deals to the U.S. Congress.
- Iran’s [forces allowed](#) Iranians to sack the Saudi Embassy to protest the execution of a Shia Saudi cleric.
- Iranian state media [added](#) \$600,000 to a bounty for the killing of author Salman Rushdie.
- Iran [pledged](#) that Palestinian terrorists will receive \$7,000, & \$30,000 if their home was demolished.
- In the Iranian 2016 elections, true reformers were barred, and the hardliners, sometimes running on “moderate lists”, [won](#) most of the elections.
- Iran [has boosted](#) by 60% the stockpiled uranium than it has since the JCPOA.
- In March 2016, the U.S. [confiscated](#) weapons that were being transported from Iran to Houthi rebels.
- Iran [intends](#) to produce the powerful explosive Octogen for use in the warheads of its missiles to improve their “destructive and penetration power.” Octogen is also used as part of the detonator in an atomic bomb.
- Iran has [launched](#) an undercover police unit to monitor citizens’ morality in Tehran.
- Iran’s Parliament is [demanding](#) compensation from the U.S. for its involvement in “spiritual and material damage”. They cited examples such as the [U.S involvement in the coup of PM Mossadegh](#) in 1953.
- Iran [has laid out](#) a plan to attack the U.S. electrical grid in an Iranian military document.
- Iran is [solidifying its foothold](#) in Latin America.
- Tehran [has deployed](#) the S-300 long-range missile defense system to protect its Fordo nuclear facility.
- Leader Khamenei’s organization, The [Execution of Imam Khomeini’s Order](#) (EIKO), [continues to confiscate](#) the assets of Iranian civilians. EIKO, worth an estimated \$95 billion dollars, “holds stakes in nearly every sector of Iranian industry, including finance, oil, telecommunications, the production of birth-control pills and even ostrich farming.” EIKO has also amassed a vast real-estate portfolio.
- Iran [sued](#) the U.S. for \$60 billion in response to efforts by the U.S. government to seize Iranian assets as a result of terror attacks that have killed Americans and others.

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