

Controversial Entities Delisted Under the JCPOA

Key: Shading denotes at least one non-nuclear sanction, no shading denotes sanctions relating to ballistics

Entity	Sanctioned Under	Categorization
Shahid Hemmat Industrial Group (G)	Executive Order 13382 (2005)	Contested: support for ballistic missile program
Shahid Bakeri Industrial Group (G)	Executive Order 13382 (2005)	Contested: support for ballistic missile program
Atomic Energy Organization of Iran (G)	Executive Order 13382 (2005)	Contested: support for ballistic missile program
Sanam Industrial Group (G)	Executive Order 13382 (2006)	Contested: support for ballistic missile program
Ya Mahdi Industries Group (G)	Executive Order 13382 (2006)	Contested: support for ballistic missile program
Bank Sepah (G)	Executive Order 13382 (2006)	Contested: banking for ballistic missile program
Qods Force (G)*	Executive Order 13224 (2007); Executive Order 13572 (2011); Iran, North Korea, and Syria Nonproliferation Act (INKSNA) (2011)	Non-nuclear: support for terrorism; Contested: support for ballistic missile program
Bank Saderat	Executive Order 13224 (2007)	Non-nuclear: support for terrorism
Oriental Oil Kish	Executive Order 13382 (2007)	Non-nuclear: support for terrorism
Sepasad Engineering Company (G)	Executive Order 13382 (2007)	Non-nuclear: support for terrorism
Omran Sahel and Sahel Consultant Engineering (G)	Executive Order 13382 (2007)	Non-nuclear: support for terrorism
Morteza Reza'I (G)	Executive Order 13382 (2007)	Non-nuclear: support for terrorism
Mohammed Hejazi (G)	Executive Order 13382 (2007)	Non-nuclear: support for terrorism
Ali Akbar Ahmadian (G)	Executive Order 13382 (2007)	Non-nuclear: support for terrorism
Hosein Salimi (G)	Executive Order 13382 (2007)	Non-nuclear: support for terrorism
Defense Industries Organization (G)	Executive Order 13382 (2007); Iran, North Korea, and Syria Nonproliferation Act (INKSNA) (2007), (2011)	Contested: support for ballistic missile program; WMD proliferation (via ballistics)
Fajr Industries Group (G)	Executive Order 13382 (2007)	Contested: support for ballistic missile program
Mizan Machine Manufacturing Group	Executive Order 13382 (2007)	Contested: support for ballistic missile program
Aerospace Industries Organization (AIO) and Affiliates (Bahmanyar Morteza Bahmanyar, Ahmad Vahid Dastjerdi, Reza Gholi Esmaeli) (G)	Executive Order 13382 (2007)	Contested: part of ballistic missile program
Bank Melli and affiliates (Bank Melli Iran Zao, Melli Bank PLC (U.K.)) (G)	Executive Order 13382 (2007)	Contested: banking support for ballistic missile program
Bank Kargoshaee (G)	Executive Order 13382 (2007)	Contested: banking support for ballistic missile program

Bank Mellat and affiliate Mellat Bank SB CJSC (Armenia)	Executive Order 13382 (2007)	Contested: banking support for ballistic missile program
Persia International Bank PLC	Executive Order 13382 (2007)	Contested: banking support for ballistic missile program
Khatam ol Anbiya Gharargah Sazendegi Nooh (G)	Executive Order 13382 (2007)	Contested: support for ballistic missile program
Assa Corporation	Executive Order 13382 (2008)	Contested: banking support for ballistic missile program
Mohsen Hojati (head of Fajr industries) (G)	Executive Order 13382 (2008)	Contested: support for ballistic missile program
Parchin Chemical Industries (G)	Executive Order 13382 (2008)	Contested: support for ballistic missile program
Mehrdada Akhlaghi Ketabachi (head of Shahid Bakeri) (G)	Executive Order 13382 (2008)	Contested: support for ballistic missile program
Naser Mlaiki (head of Shahid Hemmat Industrial Group) (G)	Executive Order 13382 (2008)	Contested: support for ballistic missile program
Shahid Sattari Industries (G)	Executive Order 13382 (2008)	Contested: support for ballistic missile program
Safety Equipment Procurement Company (G)	Executive Order 13382 (2008)	Contested: support for ballistic missile program
Joza Industrial Company (G)	Executive Order 13382 (2008)	Contested: support for ballistic missile program
Khatem ol-Anbiya Construction and Affiliates (G)	Executive Order 13382 (2008)	Contested: support for ballistic missile program
Mohammad Reza Zahedi (G)	Executive Order 13224 (2009)	Non-nuclear: support for terrorism
11 Melli Affiliates (G)	Executive Order 13382 (2009)	Contested: banking support for ballistic missile program
Pearl Energy Company, Pearl Energy Services, SA, Ali Afzali (Pearl Official)	Executive Order 13382 (2009)	Contested: banking support for ballistic missile program
IRGC Air Force (G)	Executive Order 13382 (2010)	Contested: part of ballistic missile program
IRGC Missile Command (G)	Executive Order 13382 (2010)	Contested: part of ballistic missile program
Rostam Qasemi (G)	Executive Order 13382 (2010)	Non-nuclear: economic and political issues
Mostafa Mohammed Najjar (G)	Executive Order 13553 (2010)	Non-nuclear: human rights abuses
Tidewater Middle East Company (G)	Executive Order 13382 (2011)	Non-nuclear: support for terrorism
Iran Air (G)	Executive Order 13382 (2011)	Non-nuclear: support for terrorism
The Iranian Revolutionary Guard Corps (IRGC) (G)	Executive Order 13553 (2011)	Non-nuclear: human rights abuses
Mohammed Reza Naqdi (G)	Executive Order 13553 (2011)	Non-nuclear: human rights abuses
4 Senior Qods Force Officers (G)	Executive Order 13553 (2011)	Non-nuclear: support for terrorism
Milad Jafari (G)	Iran, North Korea, and Syria Nonproliferation Act (INKSNA) (2011)	Contested: shipping for ballistic missile program
Islamic Republic of Iran Shipping Lines (IRISL) (G)	Iran, North Korea, and Syria Nonproliferation Act (INKSNA) (2011)	Contested: shipping for ballistic missile program
Shahid Bagheri Industrial Group SBIG (G)	Iran, North Korea, and Syria Nonproliferation Act (INKSNA) (2011)	Contested: shipping for ballistic missile program
SAD Import/Export Company	Iran, North Korea, and Syria Nonproliferation Act (INKSNA) (2011); Executive Order 13382 (2012)	Contested: shipping for ballistic missile program; Non-nuclear: human rights abuses

Yas Air	Executive Order 13224 (2012)	Non-nuclear: support for terrorism
Behineh Trading	Executive Order 13224 (2012)	Non-nuclear: support for terrorism
Sayyid Ali Tabatabaei	Executive Order 13224 (2012)	Non-nuclear: support for terrorism
National Iranian Oil Company (G)	Executive Order 13382 (2012)	Non-nuclear: support for terrorism
Electronic Components Industries Co. (ECI) (G)	Executive Order 13382 (2012)	Contested: part of ballistic missile program
Information Systems Iran (ISIRAN) (G)	Executive Order 13382 (2012)	Contested: part of ballistic missile program
Ministry of Defense Logistics Export (MODLEX) (G)	Executive Order 13382 (2012)	Contested: part of ballistic missile program
Daniel Frosh (Austria) and International General Resourcing FZE	Executive Order 13382 (2012)	Contested: contracts for ballistic missile program
Doostan International Company (services AIO) (G)	Executive Order 13382 (2012)	Contested: supplies ballistic missile program
Marine Industries Organization (G)	Executive Order 13382 (2012)	Contested: part of ballistic missile program
Iran Electronics Industries (G)	Executive Order 13382 (2012) Executive Order 13628 (2013)	Contested: support for ballistic missile program; Non-nuclear: human rights abuses and wiretapping
Pouya Air (alias of Yas Air)	Executive Order 13224 (2014)	Non-nuclear: support for terrorism

* (G) Signifies a government entity