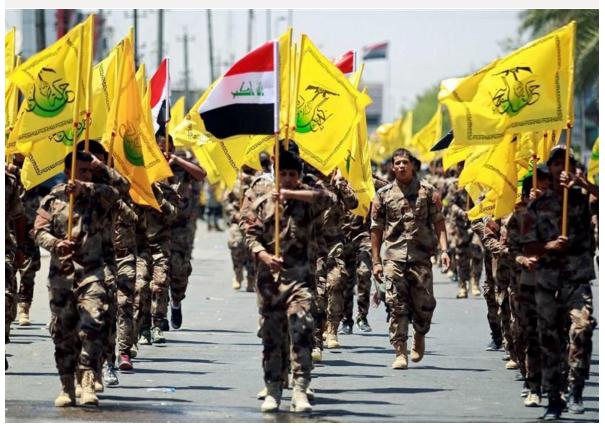


♠ INSIGHT & ANALYSIS

ARTICLE

Iran's Islamist Proxies in the Middle East

May 20, 2021



Harakat Hezbollah al Nujaba, an Iraqi militia trained by Iran's Revolutionary Guards - Tasmin News Agency (CC by 4.0)

By Ashley Lane

Since the 1979 revolution, Iran has built a network of proxies across the Middle East. At of beginning of 2020, Tehran had allies among more than a dozen major militias, some with their own political parties, that challenged local and neighboring governments. Iran's Revolutionary Guards and the elite Qods Force provided arms, training and financial support to militias and political movements in at least six countries: Bahrain, Iraq, Lebanon, the Palestinian Territories, Syria and Yemen.

The United States has struggled to deal with Iran's proxies short of military confrontation. Since 1984, and across six presidencies, the United States has sanctioned Iran's extensive network of militia proxies in the Middle East to contain Tehran's regional influence. The Trump administration increased the pace and scope of punitive economic measures between 2017 and 2021. But sanctions have never fully succeeded. In 2020, the State Department estimated that Iran gave Hezbollah \$700 million a year. In the past, Tehran had historically given \$100 million annually to Palestinian groups, including Hamas and Palestinian Islamic Jihad.



Iranian proxies sanctioned by the United States – Image Credit: U.S. Institute of Peace/Wilson Center

The Reagan administration first designated Iran a State Sponsor of Terrorism in 1984, but the Clinton administration was the first to sanction Iran's proxies. In 1995, the United States sanctioned Hezbollah, a Shiite militia and political movement in Lebanon, Hamas, a Sunni militia and political movement in the Palestinian territories, and Palestinian Islamic Jihad, also a Sunni militia in the Palestinian territories.

Between 1995 and 2020, five administrations – Clinton, Bush, Obama, Trump and Biden – sanctioned 11 Iranian proxy groups in five countries. They also sanctioned 89 leaders* from 13 groups supported by Tehran.

- Clinton administration (1993 2001): three groups (Hezbollah, Hamas, Palestinian Islamic Jihad) and six leaders
- George W. Bush administration (2001 2009): three groups (Hezbollah, Hamas, Palestinian Islamic Jihad) and 14 leaders
- Obama administration (2009 2017): one group (Kataib Hezbollah) and 34 leaders
- Trump administration (2017 2021): six groups (Ansar Allah, Asaib Ahl al Haq, Harakat Hezbollah al Nujaba, Zaynabiyoun Brigade, Fatemiyoun Division, Al Ashtar Brigades, Saraya al Mukhtar) and 32 leaders.
- Biden administration (2021): removed designation from one group (Ansar Allah) and sanctioned three leaders.

Between 2017 and 2020, the Trump administration imposed 40 percent of all those sanctions. It designated seven groups and 32 leaders tied to Iran. One of President Trump's top foreign policy goals was to limit Tehran's regional influence and support for militant groups across the Middle East. "From Lebanon to Iraq to Yemen, Iran funds, arms, and trains terrorists, militias, and other extremist groups that spread destruction and chaos across the region," he <u>said</u> in May 2017. "For decades, Iran has fueled the fires of sectarian conflict and terror."

The Trump administration "has been relentless in its use of sanctions tools to increase pressure on the Iranian regime, not only for its support of terrorism around the world, but for its manifest human rights violations at home," Nathan Sales, the State Department's coordinator for counterterrorism, told reporters in November 2020. "We remain committed to holding the regime accountable for the bloodshed that they have committed across the world in places like South America, in Europe, in Syria, in Lebanon, in Yemen, and elsewhere."

The United States has the power to impose punitive economic sanctions either through presidential executive orders or laws passed by Congress.

Three presidents – Clinton, Bush and Obama – \underline{issued} executive orders that empowered them to sanction Iranian proxies. They include:

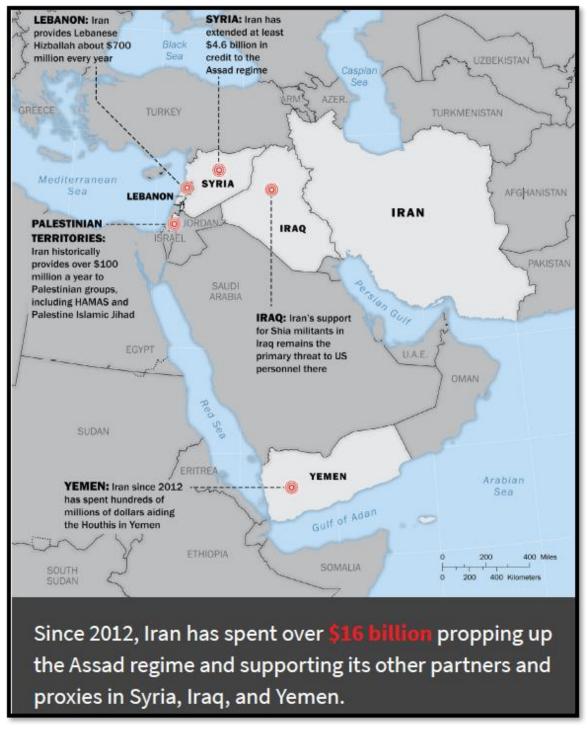
- Under Executive Order 12947 signed by President Clinton in 1995, the Treasury or State Departments could <u>designate</u> foreign individuals or organizations as Specially Designated Terrorists for disrupting the Middle East peace process. Treasury and State's powers to sanction terrorist groups were vastly expanded by the Immigration and Nationality Act in 1997 and Executive Order 13224 in 2001. President Trump officially <u>terminated</u> Executive Order 12947 in 2019 and brought these designations under Executive Order 13224.
- Under Executive Order 13224 signed by President Bush in 2001, the Treasury or State Departments can <u>designate</u> foreign individuals or organizations for committing, or pose a risk of committing, acts of terrorism that threaten U.S. interests or national security. It can also designate individuals, financiers and front companies as

Specially Designated Global Terrorists for providing support to terrorist groups. A designation imposes sanctions, which prevents these individuals and entities from engaging in transactions with individuals or companies in the United States. It also blocks any assets that they have in the United States. Its goal is to disrupt terrorist finance networks and increase public awareness of individuals and groups connected to terrorism.

- Under Executive Order 13438 signed by President Bush in 2007, the Treasury or State Departments can <u>designate</u> individuals or entities that have committed, or pose a risk of committing, violence that threatens the peace and stability of Iraq. Its goal is to disrupt support for terrorists and insurgent groups in Iraq.
- Under Executive Order 13752 signed by President Obama in 2011, the Treasury or State Departments can <u>designate</u> individuals and entities that are responsible for human rights abuses and repression in Syria. The IRGC-Qods Force and its commanders are <u>sanctioned</u> under this order.
- Under Executive Order 13611 signed by President Obama in 2012, the Treasury or State Departments can <u>designate</u> individuals and entities that threaten the peace, security and stability of Yemen. Its goal is to disrupt support for individuals and groups threatening the peace and stability of Yemen.
- On September 10, 2019, President Trump <u>amended</u> Executive Order 13224. His order superseded older authorities and included individuals and entities who were previously sanctioned under Executive Order 12947.

Congress has passed two laws to sanction Iranian proxies:

- Under Section 219 of the Immigration and Nationality Act, passed by Congress in 1997, the State Department can <u>designate</u> organizations as Foreign Terrorist Organizations (FTOs) for engaging in terrorist activities that threaten U.S. national security or interests. An FTO designation means that these groups cannot engage in transactions with individuals or companies in the United States and any assets they have in the United States are blocked. It also imposes immigration restrictions on organization members. Its goal is to limit terrorist organizations' financial resources and increase public awareness.
- The Hezbollah International Financing Prevention Act, passed by Congress in 2015, and the Hezbollah International Financing Prevention Amendments Act, passed by Congress in 2018, exclude banks that conduct transactions with Hezbollah from the U.S. financial system. The 2018 amendment allows the United States to sanction foreign entities that finance or arm Hezbollah.



The State Department estimated that Iran spent more than \$16 billion on support for the Assad regime and its proxies between 2012 and 2020 – Image Credit: U.S. Department of State

Since the mid-1990s, U.S. sanctions have been an important tool in <u>disrupting</u> terrorist financial networks, denying access to U.S. banks and deterring funders. But U.S. sanctions have not significantly impacted Iran's relationships with its proxies. "Financial sanctions can't affect many of the most important aspects of Iran's proxy relationships, including the training, safe havens, and transfers of weapons and technology that it provides," Ariane

Tabatabai and Colin Clarke <u>wrote</u> in 2019. The following is a rundown of U.S. sanctions on Iranian proxies by country.

Lebanon

Hezbollah (or Party of God)

Hezbollah is a Shiite movement that was Iran's first proxy in the Middle East. It has a militia founded in the early 1980s, with military and financial support from the Revolutionary Guards, and a political party, which first ran for office in 1992 after it emerged from the underground. In the 1980s, it <u>carried out</u> several suicide bombings against U.S. personnel and facilities in Lebanon and seized dozens of foreign hostages, including more than a dozen <u>Americans</u>. By 2020, Hezbollah had become the world's most heavily <u>armed</u> non-state actor, with at least 130,000 rockets and missiles, according to the Center for Strategic and International Studies. It also held powerful positions in Lebanon's government and economic sector.

"Hezbollah's budget, everything it eats and drinks, its weapons and rockets, comes from the Islamic Republic of Iran," Hezbollah Secretary General Hassan Nasrallah <u>said</u> in 2016. In 2018, the Treasury Department <u>estimated</u> that Tehran provided Hezbollah with more than \$700 million annually. In 2020, Iranian funding <u>decreased</u> due to U.S. sanctions, declining oil prices and the economic impact of the COVID-19 pandemic, according to Matthew Levitt of the Washington Institute for Near East Policy.

In 1995, the Clinton administration sanctioned Hezbollah and Secretary General Hassan Nasrallah for disrupting the Middle East peace process. It designated Hezbollah a Foreign Terrorist Organization in 1997. In 2001, the Bush administration designated it a Specially Designated Global Terrorist.

Between 1995 and 2020, the United States sanctioned a total of 44 Hezbollah leaders. In 2020, the Treasury Department <u>charged</u> Hezbollah's senior leadership with "creating and implementing the terrorist organization's destabilizing and violent agenda" against U.S. interests and partners around the world. Yet Hezbollah maintains global influence and remains "one of our nation's most critical national security challenges," Marshall Billingslea, Assistant Secretary for Terrorist Financing, said in 2019.

The Treasury and State Departments have sanctioned the following Hezbollah leaders:

- Secretary General **Hassan Nasrallah**: In 1995, for <u>threatening</u> to disrupt the Middle East peace process, in 2012, for <u>overseeing</u> Hezbollah's support for Syria's Assad regime, and in 2018, for <u>acting</u> on behalf of Hezbollah as its leader.
- Grand Ayatollah **Muhammad Hussein Fadlallah**: In 1995, for <u>serving</u> as a leading ideological figure of Hezbollah.
- Islamic Jihad Organization Head **Imad FayezMughniyah**: In 2001, for <u>committing</u>, or posing a significant risk of committing, acts of terrorism that threaten U.S. interests or national security. In 2011, the United States <u>delisted</u> him for no longer meeting the designation criteria under Executive Order 13224.

- Operative **Hasan Izz al Din**: In 2001, for his <u>involvement</u> in the hijacking of TWA Flight 847 on June 14, 1985.
- Operative **Ali Atwa**: In 2001, for his <u>involvement</u> in the hijacking of TWA Flight 847 on June 14, 1985.
- Senior leader **Husayn al Shami**: In 2006, for <u>leading</u> Bayt al Mal, a bank, creditor and investment arm for Hezbollah.
- Representative in South America **Bilal Mohsen Wehbe**: In 2010, for <u>overseeing</u> Hezbollah's counterintelligence activity in the Tri-Border Area (Argentina, Brazil and Paraguay) and facilitating the transfer of funds from Brazil to Hezbollah.
- Senior military commander **Mustafa Badr al Din**: In 2012, for <u>aiding</u> Hezbollah's terrorist activities and in 2015, for <u>coordinating</u> Hezbollah's military activities in Syria.
- External Security Organization head **Talal Hamiyah**: In 2012, for <u>aiding</u> Hezbollah's global terrorist activities.
- Senior commander **Ali Mussa Daqduq al Musawi**: In 2012, for <u>planning</u> the deadly attack on the U.S. troops at the Karbala Joint Provincial Coordination Center in Iraq on January 20, 2007.
- Foreign Relations Department liaison **Ali Ibrahim al Watfa**: In 2013, for <u>leading</u> a Hezbollah cell in Freetown, Sierra Leone, and <u>coordinating</u> the transfer of funds from Sierra Leone to Hezbollah in Lebanon.
- Foreign Relations Department official **Abbas Loutfe Fawaz**: In 2013, for <u>leading</u> Hezbollah activities, including recruitment and fundraising, in Senegal.
- Foreign Relations Department official **Ali Ahmad Chehade**: In 2013, for <u>leading</u> Hezbollah activities, including recruitment and coordinating travel, in Cote d'Ivoire.
- Military commander **Khalil Harb**: In 2013, for <u>planning</u> terrorist attacks against Israel and directing Hezbollah's activities in Yemen.
- Political Council member **Muhammad Kawtharani**: In 2013, for <u>directing</u> Hezbollah's activities in Iraq.
- Military commander **Muhammad Yusuf Ahmad Mansur**: In 2013, for <u>directing</u> terrorist operations in Egypt.
- Military commander **Muhammad Qabalan**: In 2013, for <u>coordinating</u> terrorist operations in Egypt.
- Islamic Jihad Organization member **Mustapha Fawaz**: In 2015, for conducting surveillance and relaying information for Hezbollah in Nigeria.
- Foreign Relations Department official **Fouzi Fawaz**: In 2015, for scouting recruits for military units and <u>providing</u> logistical support for Hezbollah in Nigeria.
- Foreign Relations Department representative **Abdallah Tahini**: In 2015, for fundraising and <u>providing</u> logistical support to Hezbollah in Nigeria.
- Jihad Council member **Ibrahim Aqil**: In 2015, for <u>aiding</u> Hezbollah fighters and pro-regime troops in Syria.
- Jihad Council member **Fuad Shukr**: In 2015, for <u>aiding</u> Hezbollah fighters and proregime troops in Syria.
- External Security Organization operative **Muhammad Ghaleb Hamdar**: In 2016, for acting on behalf of Hezbollah by assisting in the planning of terrorist acts.
- External Security Organization operative **Yosef Ayad**: In 2016, for <u>acting</u> on behalf of Hezbollah by assisting in the planning of terrorist acts.
- Military commander **Haytham Ali Tabatabai**: In 2016, for <u>commanding</u> Hezbollah's special forces in Syria and Yemen.

- Senior leader **Ali Damush**: In 2017, for <u>leading</u> Hezbollah's Foreign Relations Department.
- Military commander **Mustafa Mughniyeh**: In 2017, for <u>aiding</u> Hezbollah's terrorist activities.
- Executive Council official **Hashem Safieddine**: In 2017, for <u>committing</u>, or posing a risk of committing, acts of terrorism.
- Deputy Secretary General Naim Qasim: In 2018, for acting for or on behalf of Hezbollah.
- Judicial Council leader and military commander **Muhammad Yazbak**: In 2018, for providing logistical and training support to Hezbollah.
- Political advisor to the Secretary General **Husayn al Khalil**: In 2018, for <u>acting</u> for or on behalf of Hezbollah.
- Political Council head Ibrahim al Amin al Sayyid: In 2018, for acting for or on behalf of Hezbollah.
- Representative to Iran **Abdallah Safi al Din**: In 2018, for <u>acting</u> as a conduit between Iran and Hezbollah.
- Leader **Jawad Nasrallah:** In 2018, for <u>recruiting</u> individuals for terrorist attacks against Israel in the West Bank.
- Senior External Security Organization member **Salman Raouf Salman**: In 2019, for coordinating the bombing of the Asociación Mutual Israelita Argentina in 1994.
- Member of Parliament **Amin Sherri**: In 2019, for <u>acting</u> as an interlocutor in Lebanon for Hezbollah financiers.
- Shura Council member and Parliamentary Council head **Muhammad Hassan Rad**: In 2019, for acting for or on behalf of Hezbollah.
- Liaison and Coordination Unit head **Wafiq Safa**: In 2019, for <u>leading</u> Hezbollah's security apparatus.
- Intelligence Unit chief **Husain Ali Hazzima**: In 2019, for <u>aiding</u> Hezbollah's terrorist activities.
- Jihad Council leader **Ali Karaki**: In 2019, for <u>leading</u> Hezbollah military operations in southern Lebanon.
- Jihad Council leader **Muhammad Haydar**: In 2019, for <u>managing</u> Hezbollah networks outside of Lebanon.
- Executive Council official **Sultan Khalifa Asad**: In 2020, for <u>directing</u> companies subordinate to the Executive Council.
- Central Council member **Nabil Qaouk**: In 2020, for <u>acting</u> as an official or leader of Hezbollah.
- Central Council member **Hassan al Baghdadi**: In 2020, for <u>acting</u> as an official or leader of Hezbollah.
- Chief of Hezbollah's Central Financial Unit **Ibrahim Ali Daher:** In 2021, for acting for or on behalf of Hezbollah.

The United States has also designated dozens of Hezbollah financiers, including businesspeople, front companies, charities and banks. It also sanctioned shipping companies and airlines for providing services to Hezbollah. The Treasury and State Departments have sanctioned the following individuals, companies and organizations:

- **Assad Ahmad Barakat**: In 2004, for <u>serving</u> as a key Hezbollah financier in the Tri-Border Area (Brazil, Paraguay and Argentina). In 2006, the Treasury Department <u>sanctioned</u> nine individuals and two companies in Barakat's network.
- Al Manar Television Network and al Nour Radio: In 2006, for <u>supporting</u> Hezbollah fundraising and recruitment efforts.
- **Islamic Resistance Support Organization**: In 2006, for <u>functioning</u> as a key Hezbollah fundraising organization.
- Bayt al Mal and Yousser Company for Finance and Investment: In 2006, for <u>functioning</u> as Hezbollah's main financial body and operating under the direct supervision of Secretary General Nasrallah.
- **Bank Saderat**: In 2006, for <u>facilitating</u> the transfer of hundreds of millions of dollars annually to Hezbollah, Hamas and Palestinian Islamic Jihad.
- Galería Page Shopping Center: In 2006, for <u>serving</u> as a funding source and headquarters for Hezbollah in the Tri-Border Area.
- **Jihad al Binaa** (construction company): In 2007, for being <u>formed</u> and operated by Hezbollah.
- **Martyrs Foundation**: In 2007, for <u>providing</u> financial support to Hezbollah, Hamas, and Palestinian Islamic Jihad.
- Al Qard al Hassan: In 2007, for managing Hezbollah's financial activities.
- **Ghazi Nasr al Din** and **Fawzi Kanan**: In 2008, for <u>providing</u> financial support to Hezbollah.
- **Kassim Tajideen**: In 2009, for <u>contributing</u> tens of millions of dollars to Hezbollah. In 2010, the Treasury Department <u>sanctioned</u> his brothers, Ali and Husayn Tajideen, and their business network in Gambia, Sierra Leone, the Democratic Republic of the Congo, Angola and the British Virgin Islands, for providing support to Hezbollah.
- **Waad Project** (construction company): In 2009, for being <u>established</u> and operated by Hezbollah.
- Iranian Committee for the Reconstruction of Lebanon: In 2010, for <u>providing</u> material support to Hezbollah.
- Imam Khomeini Relief Committee—Lebanon Branch: In 2010, for being directed and run by Hezbollah members.
- **Liner Transport Kish**: In 2010, for <u>providing</u> material support, including weapons, to Hezbollah on behalf of the Revolutionary Guards.
- **Ayman Journaa**: In 2011, for <u>operating</u> a drug trafficking and money laundering network that raised hundreds of millions of dollars for Hezbollah. The Treasury Department sanctioned nine other individuals and 19 entities in Journaa's network.
- **Mahan Air**: In 2011, for <u>acting</u> on behalf of the Qods Force and transporting personnel, weapons and goods for Hezbollah.
- Yas Air: In 2012, for <u>acting</u> on behalf of the Qods Force and working with Hezbollah and Syrian officials to transfer illicit cargo to Syria.
- **Kamal and Issam Amhaz**: In 2014, for <u>procuring</u> materials and technology for Hezbollah. The Treasury Department also designated their company, Starts Group Holding SAL, and its six subsidiaries.
- Adham Tabaja: In 2015, for <u>maintaining</u> close ties to Hezbollah leadership, holding properties on the group's behalf, and securing business and investment opportunities for Hezbollah. The Treasury Department also sanctioned his company, Al Inmaa Group for Tourism Works. In 2018, it also <u>sanctioned</u> six individuals for acting on behalf of Adham Tabaja and his company.

- **Abd al Nur Shalan**: In 2015, for <u>assisting</u> in procurement and shipment of weapons and material to Hezbollah.
- **Fadi Hussein Serhan**: In 2015, for <u>providing</u> material support and services to Hezbollah. The Treasury Department also sanctioned his company, Vatech SARL.
- Adel Mohamad Cherri: In 2015, for <u>providing</u> material support and services to Hezbollah. The Treasury Department also sanctioned his company, Le Hua Electronic Field Co. Limited.
- **Aero Skyone Co. Ltd. And Labico S.A.L. Offshore:** In 2015, for being <u>owned</u> or controlled by Ali Zeaiter. In 2014, the Treasury Department sanctioned Ali Zeaiter for procuring dual-use technology for Hezbollah.
- Ali Youssef Charara and Spectrum Investment Group Holding SAL: In 2016, for investing in commercial projects that support Hezbollah.
- **Mohammad Noureddine**: In 2016, for <u>providing</u> financial services to Hezbollah through his company Trade Point International S.A.R.L.
- Hasan Jamal al Din and Muhammad al Mukhtar Kallas: In 2016, for providing financial services to Hezbollah financier Adham Tabaja.
- **Mohammad Amer Alchwiki**: In 2018, for <u>facilitating</u> the transfer of hundreds of millions of dollars to Hezbollah.
- **Mohammad Ibrahim Bazzi**: In 2018, for <u>providing</u> hundreds of millions of dollars to Hezbollah over many years.
- Al Bilad Islamic Bank: In 2018, for <u>enabling</u> Iran to move funds from Tehran to Hezbollah, as well as Iraqi groups backed by Iran.
- **Nazem Said Ahmad**: In 2018, for his <u>role</u> as a prominent Hezbollah money launderer and financier.
- **Atlas Holding**: In 2020, for being <u>owned</u> or controlled by the Martyrs Foundation, which was sanctioned in 2007. The Treasury Department also sanctioned three officials and 11 other entities that are affiliated with the Martyrs Foundation.
- **Meamar Construction and Arch Consulting**: In 2020, for being <u>owned</u> or controlled by Hezbollah.
- Ahmad Mohamad Yazbeck, Abbas Hassan Gharib, Wahid Mahmud Subayti, Mostafa Habib Harb, Ezzat Youssef Akar, and Hasan Chehadeh Othman: In 2021, for <u>acting</u> on or behalf of Al Qard al Hassan, a sanctioned financial firm used by Hezbollah.

Iraq

Kataib Hezbollah (or Party of God Brigades)

Kataib Hezbollah is a Shiite militia <u>formed</u> in 2007 and <u>trained and armed</u> by Iran's Revolutionary Guards. In 2009, the State Department <u>designated</u> Kataib Hezbollah a Foreign Terrorist Organization, and the Treasury Department <u>sanctioned</u> its Secretary General, Abu Mahdi al Muhandis, for committing acts of violence against Coalition and Iraqi Security Forces. The United States imposed two additional rounds of sanctions on Kataib Hezbollah leadership in 2020.

In 2014, the militia joined Iraq's Popular Mobilization Forces (PMF) to fight ISIS but maintained its close ties with Tehran. "I will not shy away from mentioning the support of

the Islamic Republic of Iran in terms of weapons, advising, and planning," Muhandis <u>said</u> in 2018.

With Iranian backing, Kataib Hezbollah <u>carried out</u> the most sophisticated and effective attacks against U.S. forces and coalition allies in Iraq from 2007 to 2011 and 2018 to 2020. On December 27, 2019, it launched a rocket attack on the K1 military base near Kirkuk that killed a U.S. civilian contractor and wounded four U.S. service members and two Iraqi security forces personnel. In January 2020, the United States retaliated with a drone strike on Muhandis and Gen. Qassem Soleimani, the commander of the Qods Force, in Baghdad. It also <u>designated</u> its new secretary general, Ahmad al Hamidawi, a global terrorist in February 2020.

The Treasury and State Departments have sanctioned the following Kataib Hezbollah leaders:

- Secretary General **Abu Mahdi al Muhandis**: In 2009, for <u>training</u> Iraqi Shiite militias and directing attacks against Coalition and Iraqi Security Forces.
- Special Operations Commander **Shaykh Adnan al Hamidawi**: In 2020, for <u>acting</u> for or on behalf of Kataib Hezbollah.
- Secretary General Ahmad al Hamidawi: In 2020, for acting for or on behalf of Kataib Hezbollah.

The United States has also sanctioned front companies for acting on behalf of the Qods Force and providing aid to Iraqi militias backed by Iran.

The Treasury Department has sanctioned the following firms:

- Reconstruction Organization of the Holy Shrines in Iraq: In 2020, for being controlled by the Qods Force and transferring millions of dollars to Kosar Company.
- Bahjat al Kawthar Company for Construction and Trading Ltd (Kosar Company): In 2020, for <u>serving</u> as a base for Iranian intelligence activities in Iraq, including weapons shipments to militias backed by Iran.

Asaib Ahl al Haq (or the League of the Righteous)

Asaib Ahl al Haq is a Shiite militia that was <u>founded</u> in 2006 and <u>trained</u>, <u>armed</u>, <u>and funded</u> by Iran's Revolutionary Guards and Lebanon's Hezbollah. Between 2006 and 2011, when the U.S. military withdrew from Iraq, it <u>launched</u> more than 6,000 attacks on U.S. and coalition forces. In 2014, it joined the government-funded PMF to fight ISIS in northern Iraq. With some <u>20,000 members</u>, it became one of the largest militias in the PMF, yet it maintained operational ties with Tehran. "It is no secret that Iran supports all the militias in this area and we are obviously one of them," Qais al Khazali, the group's leader, <u>said</u> in 2015.

In January 2020, the State Department <u>designated</u> Asaib Ahl al Haq a Foreign Terrorist Organization. It also listed Khazali and his brother, Laith al Khazali, as global terrorists. "AAH and its leaders are violent proxies of the Islamic Republic of Iran," Secretary of State

Mike Pompeo <u>said</u>. "Acting on behalf of their masters in Tehran, they use violence and terror to further the Iranian regime's efforts to undermine Iraqi sovereignty."

The Treasury Department has sanctioned the following AAH leaders:

- Secretary General **Qais al Khazali**: In 2019, for <u>committing</u> human rights abuses against Iraqi protestors and leading the attack on an Iraqi government compound near Karbala in January 2007 that killed five U.S. soldiers.
- Senior leader **Laith al Khazali**: In 2019, for <u>committing</u> human rights abuses against Iraqi protestors and leading the attack on an Iraqi government compound near Karbala in January 2007 that killed five U.S. soldiers.

Harakat Hezbollah al Nujaba (or Movement of the Party of God's Nobles)

Harakat Hezbollah al Nujaba is a Shiite militia <u>founded</u> in 2013 and trained, armed and advised by Iran's Revolutionary Guards. Its original purpose was to support Bashar al Assad in Syria against anti-regime rebels; in 2014, it expanded its mission to fight ISIS and joined the PMF. But it continued to receive support from Tehran. "We do not hide the fact that the technical and logistical support comes from the Islamic Republic," Akram Abbas al Kabi, the group's leader, <u>told *Al-Monitor*</u> in 2015.

In 2019, the State Department <u>designated</u> Harakat Hezbollah al Nujaba a Foreign Terrorist Organization and listed al Kabi as a Specially Designated Global Terrorist. The Treasury Department <u>sanctioned</u> al Kabi in 2008, prior to the group's formation, for conducting attacks against Coalition Forces in Iraq.

The Treasury and State Departments have sanctioned the following leaders:

 Leader Akram Abbas al Kabi: In 2008, for <u>leading</u> attacks against Iraqi and Coalition Forces and in 2019, for <u>committing</u>, or posing a risk of committing, terrorist acts.

Badr Organization

The Badr Organization is a Shiite militia <u>formed</u> in 1982 that has been <u>funded</u>, <u>trained and armed</u> by Iran's Revolutionary Guards. It is the oldest and most powerful of Iran's proxies in Iraq. Based in Iran during Saddam Hussein's rule, it <u>returned</u> to Iraq after he was ousted by U.S. invasion in 2003. In 2014, it joined the PMF and was a <u>pivotal force</u> fighting ISIS from 2014 to 2017. It also has a political wing that has won seats in parliament.

The U.S. government has not designated the Badr Organization, but the Treasury Department did <u>sanction</u> Abu Mustafa al Sheibani, the group's former leader, in 2008. Al Sheibani <u>left</u> the Badr Organization in 2003.

The Treasury Department has sanctioned the following Badr Organization leaders:

• Former leader **Abu Mustafa al Sheibani**: In 2008, for <u>committing</u> attacks, or posing a risk of committing attacks, against Iraqi and U.S.-led coalition forces.

Kataib Sayyad al Shuhada (or the Masters of the Martyrs Brigade)

Kataib Sayyad al Shuhada is a Shiite militia <u>founded</u> in 2013 and <u>funded and supported</u> by the Revolutionary Guards. Its original mission was to support the Assad regime in Syria against a rebel uprising, but in 2014 it joined Iraq's PMF to fight ISIS. The United States has not designated Kataib Sayyid al Shuhada a Foreign Terrorist Organization, although the Treasury Department <u>designated</u> Abu Mustafa al Sheibani, the group's co-founder, a Specially Designated Global Terrorist in 2008.

The Treasury Department has sanctioned the following leaders:

• Co-founder **Abu Mustafa al Sheibani**: In 2008, for <u>committing</u> attacks, or posing a risk of committing attacks, against Iraqi and U.S.-led coalition forces.

Yemen

Ansar Allah (or the Houthis)

Ansar Allah is a Zaydi Shiite movement <u>founded</u> in the early 1990s that has <u>fought</u> the Yemeni government since 2004. The Houthis <u>captured</u> Yemen's capital, Sanaa, in 2014 and helped <u>oust</u> President Abed Rabbo Mansour Hadi's government in 2015. They have been supported by the Revolutionary Guards since at least <u>2011</u>; Iran and Lebanese Hezbollah expanded <u>training</u> and increased arms shipments and arms after a Saudi-led coalition intervened in Yemen's war in 2015.

The United States sanctioned <u>two senior Houthi military commanders</u> in 2014 and the Ansar Allah founder, <u>Abdul Malik al Houthi</u>, in 2015. The Trump administration reportedly considered designating the Houthis a Foreign Terrorist Organization in <u>November 2018</u> and in <u>September 2020</u> to intensify pressure on Iran.

The Treasury Department has sanctioned the following Houthi leaders:

- Military commander **Abd al Khaliq al Houthi**: In 2014, for threatening and undermining peace and stability in Yemen and in 2021, as a Specially Designated Global Terrorist.
- Second-in-command **Abdullah Yahya al Hakim**: In 2014, for <u>threatening</u> and undermining peace and stability in Yemen, and in 2021, as a Specially Designated Global Terrorist.
- Leader **Abdul Malik al Houthi**: In 2015, for <u>threatening</u> and undermining peace and stability in Yemen, and in 2021, as a Specially Designated Global Terrorist.
- Head of the General Staff **Muhammad abd al Karim al Ghamari:** In 2021, for <u>threatening</u> the peace, security or stability of Yemen.
- Military official **Yusuf al Madani**: In 2021, as a <u>Specially Designated Global Terrorist</u>.

Syria

Zaynabiyoun Brigade

The Zaynabiyoun Brigade is a Pakistani Shiite militia <u>established</u> in 2014 by the Revolutionary Guard Corps and <u>trained</u> by the Qods Force. It has recruited among Pakistanis living in Iran as well as from Pakistan's tribal areas. It has fought with the Assad regime's forces in Syria.

In 2019, the Treasury Department <u>sanctioned</u> the Zaynabiyoun Brigade for supporting the Qods Force and human rights abuses in Iran. "The brutal Iranian regime exploits refugee communities in Iran, deprives them of access to basic services such as education, and uses them as human shields for the Syrian conflict," Treasury Secretary Steven Mnuchin charged.

Fatemiyoun Division

The Fatemiyoun Division is an Afghan militia <u>founded</u> in the 1980s that <u>went dormant</u> in the 1990s and was revived by Iran's Revolutionary Guards in 2012. It is primarily <u>made</u> <u>up</u> of Hazara refugees from Afghanistan living in Iran. Since 2014, Iran's Revolutionary Guards have <u>deployed</u> the militia to fight for the Assad regime in Syria. In 2017, some 50,000 Afghans were <u>deployed</u> in Syria.

The Treasury Department <u>sanctioned</u> the Fatemiyoun Division in 2019 for supporting the Qods Force and engaging in human rights abuses in Iran. It claimed that Iran had coerced Afghan refugees to fight in Syria or face imprisonment in Iran or deportation to Afghanistan.

Bahrain

Saraya al Ashtar (or the Al Ashtar Brigades)

The Al Ashtar Brigades is a militant group based in Bahrain <u>funded</u>, <u>trained and armed</u> by Iran. The State Department charged that it has committed terrorist attacks in Bahrain to overthrow the government. In 2014, the group killed two Bahraini police officers and one Emirati officer in a bomb attack.

The Treasury Department designated two of Al Ashtar Brigade's leaders global terrorists in March 2017. The State Department <u>designated</u> it a Foreign Terrorist Organization in July 2018. Al Ashtar is "another in a long line of Iranian sponsored terrorists who kill on behalf of a corrupt regime," Nathan Sales, the State Department coordinator for counterterrorism, said in 2018.

The State Department has sanctioned the following Saraya al Ashtar leaders:

• Senior member **Ahmad Hasan Yusuf**: In 2017, for <u>posing</u> a risk of committing acts of terrorism that threaten U.S. interests and national security.

• Senior member **Alsayed Murtadha Majeed Ramadhan Alawi**: In 2017, for <u>posing</u> a risk of committing acts of terrorism that threaten U.S. interests and national security.

Saraya al Mukhtar

Saraya al Mukhtar is a militant group based in Bahrain <u>funded</u> and supported by Iran. The State Department charged that it plotted attacks against U.S. personnel in Bahrain and offered cash rewards for the assassination of Bahraini officials. Saraya al Mukhtar's goal is to overthrow the monarchy.

The State Department <u>designated</u> it a Specially Designated Global Terrorist in December 2020.

Palestinian Territories

Hamas (or the Islamic Resistance Movement)

Hamas, or Harakat al Muqawama al Islamiyah, is a Sunni Islamist militia and political party based in Gaza that has reportedly been funded, armed and <u>trained</u> by Iran's Revolutionary Guards since the early 1990s. Hamas opened an office in Tehran in the 1990s. The U.S. government <u>sanctioned</u> Hamas in 1995, <u>designated</u> it a Foreign Terrorist Organization in 1997 and named it a Specially Designated Global Terrorist in 2001. It has also imposed multiple rounds of sanctions on 21 senior leaders and operatives.

In 2012, Iran <u>cut off</u> funding to Hamas after it refused to support the Assad regime in the Syrian civil war. Iran <u>resumed</u> financial assistance to Hamas in 2017. "Relations with Iran are excellent and Iran is the largest supporter of the Izz ad Din al Qassam Brigades with money and arms," Yahya Sinwar, a senior Hamas military leader, <u>said</u> in 2017. Iran has provided more than \$100 million annually to Palestinian groups, including Hamas and Palestine Islamic Jihad, the <u>State Department</u> reported in 2020.

The Treasury and State Departments have sanctioned the following Hamas leaders:

- Founder and leader in Gaza **Sheikh Ahmed Yassin**: In 1995, for <u>disrupting</u> the Middle East peace process and in 2003, for <u>committing</u> acts of terrorism.
- Political Bureau Deputy Chief in Syria **Musa Abu Marzouk**: In 1995, for <u>disrupting</u> the Middle East peace process and in 2003, for <u>committing</u> acts of terrorism.
- Political Bureau member in Syria **Imad Khalil al Alami**: In 2003, for <u>committing</u> acts of terrorism.
- Senior leader in Lebanon Usama Hamdan: In 2003, for <u>committing</u> acts of terrorism.
- Political Bureau and Executive Committee Head in Syria **Khalid Mishaal**: In 2003, for <u>committing</u> acts of terrorism.
- Leader in Gaza **Abdel Aziz Rantisi**: In 2003, for <u>reporting</u> to Hamas leader Sheikh Ahmed Yassin.

- Operative **Muhammad Hisham Muhammad Ismail Abu Ghazal**: In 2011, for facilitating and disseminating improvised explosive devices (IEDs).
- Senior operative **Rawhi Mushtaha**: In 2015, for <u>helping found</u> the forerunner of the Izz ad Din al Qassam Brigades, the military wing of Hamas.
- Senior operative **Yahya Sinwar**: In 2015, for <u>helping found</u> the forerunner of the Izz ad Din al Qassam Brigades, the military wing of Hamas.
- Izz ad Din al Qassam Brigades commander **Muhammad Deif**: In 2015, for <u>deploying</u> suicide bombers, directing the kidnapping of Israeli soldiers and designing Hamas' offensive strategy against Israel in 2015.
- Political Bureau member **Salih al Aruri**: In 2015, for <u>funding and directing</u> military operations in the West Bank against Israel.
- Hamas Finance Committee leader in Saudi Arabia Mahir Jawad Yunis Salah: In 2015, for <u>overseeing</u> the transfer of millions of dollars from Iran and Saudi Arabia to Hamas' military wing.
- Senior financial officer **Abu Ubaydah Khayri Hafiz al Agha**: In 2015, for his <u>involvement</u> in funding, investment and money transfers to Hamas in Saudi Arabia.
- Interior Minister **Fathi Hammad**: In 2016, for <u>coordinating</u> terrorist cells in Gaza and establishing Al Aqsa TV, a Hamas media outlet.
- Military commander **Abu Anas al Ghandour**: In 2017, for his <u>involvement</u> in Hamas terrorist operations, including a 2006 attack on the Israeli Defense Forces outpost at the Kerem Shalom border crossing.
- Political Bureau president **Ismail Haniyeh**: In 2018, for his reported <u>involvement</u> in terrorist attacks against Israeli citizens and links to Hamas' military wing.
- Financial operative in Lebanon Muhammad Sarur: In 2019, for managing money transfers from the Qods Force to Izz ad Din al Qassam Brigades, Hamas' military wing.
- Financial associate **Kamal Abdelrahman Aref**: In 2019, for <u>coordinating</u> with Muhammad Sarur to transfer money from the Qods Force to Hamas.
- Financial auditor **Fawaz Mahmud Ali Nasser**: In 2019, for <u>transferring</u> Iranian funds through Hezbollah to Hamas and managing funds related to Hamas prisoners.
- Finance Office head **Zaher Jabarin**: In 2019, for <u>managing</u> Hamas' yearly budget, transferring millions of dollars to Hamas through Redin Exchange and serving as a point of contact between the Qods Force and Hamas.
- Izz ad Din al Qassam Brigades Deputy Commander **Marwan Issa**: In 2019, for commanding Hamas' military wing, which carries out attacks against Israel.

The Treasury Department has sanctioned more than a dozen charities, front companies, and banks for providing financial support to Hamas, including:

- Holy Land Foundation for Relief and Development: In 2001, for providing millions of dollars each year to Hamas.
- **Beit el Mal Holdings**: In 2001, for being <u>controlled</u> by Hamas.
- Al Aqsa Islamic Bank: In 2001, for <u>functioning</u> as the financial arm of Hamas and being owned by Beit el Mal Holdings.
- Commite de Bienfaisance et de Secours aux Palestiniens (France): In 2003, for providing support and funding to Hamas.
- **Association de Secours Palestinien** (Switzerland): In 2003, for <u>providing</u> support and funding to Hamas.

- Palestinian Relief and Development Fund (United Kingdom): In 2003, for providing support and funding to Hamas.
- Palestinian Association in Austria: In 2003, for <u>providing</u> support and funding to Hamas.
- Sanabil Association for Relief and Development (Lebanon): In 2003 for providing support and funding to Hamas.
- Al Aqsa Foundation: In 2003, for providing financial support to Hamas.
- Al Salah Society: In 2007, for <u>serving</u> as a charitable front and providing financing for Hamas.
- **Islamic National Bank**: In 2010, for being controlled by Hamas and <u>providing</u> financial services to Hamas members and employees, including members of the organization's military wing.
- Al Waqfiya al Riaya al Usra al Filistinya wa al Lubnanya: In 2012, for being controlled by and providing financial support to Hamas.
- **Al Quds International Foundation**: In 2012, for being <u>controlled</u> by and acting on behalf of Hamas.
- **Asyaf International Holding Group for Trading and Investment**: In 2015, for its involvement in investments and money transfers on behalf of Hamas.

Palestinian Islamic Jihad (or Harakat al Jihad al Islami al Filistin)

Palestinian Islamic Jihad is a Sunni Islamist militant group in Gaza <u>funded</u>, <u>trained and armed</u> by Iran since the late 1980s. Although based in <u>Damascus</u>, it has long maintained an office in Tehran. The United States first <u>sanctioned</u> Palestinian Islamic Jihad in 1995 for disrupting the Middle East peace process and designated it a Foreign Terrorist Organization in 1997 for committing terrorist acts that threaten U.S. interests and national security.

Iran provided more than \$100 million annually to Palestinian groups, including Hamas and Palestine Islamic Jihad, the <u>State Department</u> reported in 2020. "The Palestinian Islamic Jihad is another fruit of the Ayatollah Khomeini's fructuous tree," Secretary General Ramadan Shallah <u>said</u> in 2002. Iran reportedly <u>cut off</u> funding to the group in May 2015 because it did not support Tehran's involvement in Yemen. It <u>renewed</u> funding in May 2016.

The Treasury and State Departments have sanctioned the following Palestinian Islamic Jihad leaders:

- Secretary General Ramadan Shallah: In 1995, for <u>disrupting</u> the Middle East peace process.
- Co-founder and ideological leader **Abd al Aziz Awda**: In 1995, for <u>disrupting</u> the Middle East peace process.
- Secretary General **Ziyad al Nakhalah**: In 2014, for his <u>involvement</u> in terrorist attacks against Israel.
- Deputy Secretary General **Muhammad al Hindi**: In 2019, for <u>committing</u> acts of terrorism that threaten U.S. interests and national security.
- Higher Military Council member **Baha Abu al Ata**: In 2019, for <u>committing</u> acts of terrorism that threaten U.S. interests and national security.

The Treasury Department has sanctioned at least one charity for providing financial support to Palestinian Islamic Jihad:

• **Elehssan Society**: In 2005, for <u>serving</u> as a charitable front and providing financing for Palestinian Islamic Jihad.

Saudi Arabia

Hezbollah al Hejaz (or the Saudi Party of God)

Hezbollah al Hejaz was a Shiite militant group founded in 1987, <u>modeled</u> on Lebanon's Hezbollah, and aligned with Iran. In 2001, the United States sanctioned four leaders linked to the 1996 Khobar Towers bombing that <u>killed</u> 19 U.S. Air Force personnel and wounded 372.

In 2001, the Justice Department indicted Iran for financing and directing the Khobar Towers attack by Saudi Hezbollah. In 2006, a U.S. federal court <u>ordered</u> Iran to pay \$254 million to the families of the Americans who died in the attack. The evidence "firmly established that the Khobar Towers bombing was planned, funded and sponsored by senior leadership in the government of the Islamic Public of Iran," the court <u>ruled</u>. After the Saudi <u>crackdown</u> on Hezbollah al Hejaz following the Khobar Towers bombing, the organization effectively disappeared.

The State Department sanctioned the following Hezbollah al Hejaz leaders:

- Leader **Abdelkarim Hussein Mohamed al Nasser**: In 2001, for <u>carrying out</u> the bombing of the Khobar Towers military housing complex in Dhahran, Saudi Arabia, in 1996.
- Senior leader and military wing head **Ahmad Ibrahim al Mughassil**: In 2001, for carrying out the bombing of the Khobar Towers military housing complex in Dhahran, Saudi Arabia, in 1996.
- Member **Ali Saed Bin Ali el Hoorie**: In 2001, for <u>carrying out</u> the bombing of the Khobar Towers military housing complex in Dhahran, Saudi Arabia, in 1996.
- Member **Ibrahim Salih Mohammed al Yacoub**: In 2001, for <u>carrying out</u> the bombing of the Khobar Towers military housing complex in Dhahran, Saudi Arabia, in 1996.

*Seven leaders have been sanctioned multiple times, under different administrations. The following leaders were only included in the tallies for the administrations that first sanctioned them.

- Hassan Nasrallah 3 times
- Akram Abbas al Kabi 2 times
- Sheikh Ahmed Yassin 2 times
- Musa Abu Marzouk 2 times
- Abd al Khaliq al Houthi 2 times
- Abdullah Yahya al Hakim 2 times

• Abdul Malik al Houthi - 2 times

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