

the President to send to Congress an annual report on individuals sanctioned under the Act.

The administration of President Donald Trump issued the first round of Magnitsky sanctions in December 2017. The administration has continued to use Global Magnitsky, CISADA, and related executive orders to sanction senior Iranian officials responsible for egregious violations of religious freedom. Additionally, on June 2, 2020, President Trump signed an [executive order](#) reiterating the importance of targeted sanctions under legal authorities, such as the Global Magnitsky Human Rights Accountability Act, as a response to egregious religious freedom violations in Iran and elsewhere, following a bipartisan precedent of imposing sanctions against these individuals.

A detailed list of Iranian officials and entities sanctioned between 2010 and 2020 can be found at <https://fas.org/sgp/crs/mideast/RS20871.pdf>.

Available Measures to Impose Targeted Sanctions on Religious Freedom Violators

The following items represent the most relevant legislative provisions and executive orders under which the President has authority to impose religious freedom-related sanctions on Iranian officials and entities:

- [CISADA Section 3 and Section 105](#)

According to Section 3: “The President should identify the officials of the Government of Iran and other individuals who are responsible for continuing and severe violations of human rights and religious freedom” and prohibit these officials from entry into the United States and freeze their U.S. assets. Section 105 targets individuals who are Iranian government officials, or who are persons acting on behalf of the Iranian government, and determined as responsible for human rights abuses committed after the contested June 2009 presidential election. The President is [granted full discretion](#) to designate individuals, impose visa restrictions, and block U.S.-based assets.

- [Executive Order 13553](#)

Executive Order 13553 authorizes the President to target persons and entities that assist or provide financial or material support to designated Iranian individuals or entities.

- [Executive Order 13606](#)

Executive Order 13606 authorizes the President to target computer and network disruption, monitoring, and tracking by government authorities in Iran and Syria. Sanctionable activities include the operation and provision of technologies that facilitate computer and network disruption, monitoring, or tracking, and that could be used to commit serious human rights abuses against Iranian citizens. When issuing the order in 2012, President Obama designated key entities such as Iran’s Revolutionary Guard Corps, Ministry of Intelligence and Security, and Law Enforcement Forces (see Appendix 2). These entities will remain designated and sanctioned.

- [Executive Order 13628](#)

Section 2 of Executive Order 13628 authorizes the President to impose sanctions on any person determined to have knowingly transferred or facilitated the transfer of goods or technologies to Iran that are likely to be used by the Iranian government to commit serious human rights abuses against the Iranian people. Moreover, Section 2 authorizes the President to impose sanctions on any person who knowingly provided services relating to hardware, software, or specialized information or professional consulting, engineering, or support services likely to be used to commit serious human rights abuses in Iran. These entities and officials will remain designated and sanctioned (see Appendix 3).

- [Executive Order 13846](#)

Section 7 of Executive Order 13846 allows the U.S. government to sanction entities that provide services or transfer goods or technology to Iran that are likely to be used by the government of Iran to commit serious human rights abuses.

- [Executive Order 13876](#)

Executive Order 13876 allows the U.S. government to freeze the assets of Iranian officials, including Supreme Leader Ayatollah Ali Khamenei.

Most Recent Iranian Officials Sanctioned for Severe Religious Freedom Violations

Over the past year, the U.S. government has used several of these sanctions instruments to target senior Iranian officials responsible for severe religious freedom violations.



Mohammed Mohammadi Golpayegani
Mohammed Golpayegani is chief of staff in the Office of Supreme Leader Ayatollah Ali Khamenei. In 1991, Golpayegani issued a [confidential memorandum](#) to Khamenei outlining a plan for the

systematic persecution of Baha'is in Iran, including expelling them from universities, destroying their cultural roots outside of the country, and denying them employment and positions of influence. He then collaborated with Ayatollah Khamenei to ensure the actualization of that plan. On November 4, 2019, the U.S. Department of Treasury [designated](#) Golpayegani under Executive Order ([E.O.](#)) [13876](#), which imposed sanctions on the Supreme Leader and his Office, representing the first time the Treasury Department has sanctioned an individual specifically for his role in orchestrating the persecution of Baha'is in Iran.



Mohammed Moghiseh
Mohammed Moghiseh presides over Branch 28 of the Tehran Revolutionary Court. He has routinely imposed harsh sentences against members of religious minority communities in Iran, including

[Christians](#), [Sunni Muslims](#), and [members of Iran's Baha'i](#) community. In 2014, he [sentenced](#) eight Facebook users on charges of “blasphemy,” and in 2019, he sentenced lawyer Nasrin Sotoudeh to 33 years in prison—12 of which are enforceable under Iranian law—for [defending](#) women protesting the mandatory religious headscarf. On December 19, 2019, the U.S. Department of Treasury [designated](#) Moghiseh under [E.O. 13846](#). USCIRF originally [called](#) for Moghiseh to be sanctioned in 2010 for severe religious freedom violations.



Abolghassem Salavati
Abolghassem Salavati presides over Branch 15 of the Tehran Revolutionary Court. He has regularly imposed extremely [harsh sentences](#) on [members of religious minority communities](#), including former USCIRF Religious Prisoner of Conscience (RPOC) [Mohammed Ali Taheri](#) and [members of the Baha'i, Sufi, and Zoroastrian](#) communities. In 2014, a man who Salavati had [convicted](#) of “corruption on earth” and “heresy in religion” was executed at Rajai-Shahr prison. On

December 19, 2019, the U.S. Department of Treasury [designated](#) Salavati under [E.O. 13846](#). USCIRF originally [called](#) for Salavati to be sanctioned in 2010 for severe religious freedom violations.



Mohsen Reza'i

Mohsen Reza'i is a senior member of Iran's Expediency Council, a body which advises the Supreme Leader and can approve or amend laws received from Iran's parliament. He [served](#) as commander of the Islamic revolutionary Guard Corps from 1981 to 1997. In 2006, an Argentinian judge issued an international arrest warrant through INTERPOL for Reza'i for his suspected [role](#) in the 1994 suicide bombing of the Jewish cultural center in Buenos Aires that killed 85 people—the deadliest terrorist attack in Argentina's history. On January 10, 2020, the U.S. Department of Treasury [designated](#) Reza'i under [E.O. 13876](#).



Ahmad Jannati

Ahmad Jannati is Chairman of Iran's Guardian Council, which vets legislation and electoral candidates. He is also Chairman of the Assembly of Experts, which officially chooses Iran's Supreme Leader. In 2005, Jannati claimed in a [public speech](#) that “Non-Muslims such as Zoroastrians, Christians, and Jews cannot be called human beings but are animals who roam the earth and engage in corruption.” Prior to the May 2017 elections, Jannati [declared](#)—contrary to article 26 of Iran's 1996 council election law—that it was a violation of the Shari'a for non-Muslims to run as candidates in Shi'a Muslim-majority areas. In 2018, Jannati [invalidated](#) the election of a Zoroastrian politician to the Yazd city council. On February 20, 2020, the U.S. Department of Treasury [sanctioned](#) Jannati under [E.O. 13876](#). USCIRF originally [called](#) for Jannati to be sanctioned in 2011 for severe religious freedom violations.



Ayoub Soleimani

Ayoub Soleimani is Deputy Commander of Iran’s Law Enforcement Forces and oversees the country’s cyber police unit, which monitors social media and online political speech. Soleimani *played a role* in suppressing protests against the mandatory religious headscarf (*hijab*) in July 2019, calling an improperly worn hijab an “obvious crime.” Soleimani also called the removal of religious headscarves a “plot” devised by “the enemy” and said security forces would “confront it with no compromise”—an accusation that frames those with different religious beliefs as disloyal traitors. On May 20, 2020, the U.S. Department of Treasury *designated* Soleimani under [E.O. 13553](#).

Conclusion

Over the past decade, two successive administrations have utilized newly passed legislation and executive orders to impose targeted sanctions on dozens of Iranian officials and entities responsible for egregious religious freedom violations in Iran. Although the Iranian government has continued to perpetrate severe religious freedom violations over the years, the ongoing documentation of specific abuses, and the identification of officials responsible, will significantly aid future efforts to hold them accountable.

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The U.S. Commission on International Religious Freedom (USCIRF) is an independent, bipartisan federal government entity established by the U.S. Congress to monitor, analyze, and report on threats to religious freedom abroad. USCIRF makes foreign policy recommendations to the President, the Secretary of State, and Congress intended to deter religious persecution and promote freedom of religion and belief.