



İstanbul :

10.10.2017

Sayı

Our Reference: **3795**

Konu : ABD'nin İran'a yönelik yeni yaptırımları Hk.

Subject: **Sirküler No: 2017/ 636**

İlgi: TOBB'nin 04.10.2017 tarih ve 0431/15165 sayılı yazısı.

İlgi yazı ile, Dış İşleri Bakanlığı'nın 18.09.2017 tarih ve 2017/12847095 sayılı yazısına atıfla,
 - Kapsamlı Ortak Eylem Planı (KOEP) kapsamında ABD'nin İran'a uyguladığı nükleer yaptırımların kaldırılması için yasalar gereği Başkan'ın belirli aralıklarla yaptırımların kaldırılmasına ilişkin muafiyetleri (waiver) uzatması gerektiği, bu çerçevede ABD'nin nükleer yaptırımlara ilişkin muafiyetleri 14 Eylül 2017 tarihinde bir kez daha uzatıldığının bildirildiği,
 - Nükleer yaptırımlarla ilgili muafiyetlerin uzatıldığına dair açıklamayla eş zamanlı olarak ABD Hazine Bakanlığı tarafından da aynı gün, yaptırımlar listesinde bulunan İranlı kurumlara sağladıkları destek ya da suç unsuru oluşturan siber faaliyetler nedeniyle on bir (11) gerçek ve tüzel kişiye yaptırım uygulanmasının kararlaştırıldığı ve duyurulduğu,
 - BM Güvenlik Konseyi'nin İran'a yönelik yaptırım kararlarının **ülkemiz bakımından hukuki bağlayıcı nitelikte olduğu, ilgili kurum ve kuruluşlarımız tarafından uygulanmasının zorunlu olduğu, ABD ve AB'nin kabul ettikleri tek taraflı yaptırım karar ve uygulamalarının Türkiye açısından hukuki bağlayıcılığının bulunmamasında olduğu, ancak ABD yaptırımlarının sınır aşan etkiye sahip olması nedeniyle, yaptırım altına alınacak kişi ve kuruluşlarla iş akdine girecek firma ve kuruluşlarımızın da dolaylı olarak yaptırımdan etkilenme olasılığı** çerçevesinde alınan yaptırımlar hakkında bilgilendirmede bulunulmasında yarar görüldüğü,
 belirtilerek üyelerimizin bilgilendirilmeleri istenmektedir.

Bilgi ve gereğini arz ve rica ederiz.

Saygılarımızla,


 Murat TUNCER
 Genel Sekreter

EK: Ek yazı ve yaptırım uygulanan 7 şahıs ve 4 firma listesi,(3sayfa)

DAĞITIM

GEREĞİ

- Tüm Üyelerimiz (WEB Sayfasında)
- Türk Armatörler Birliği
- S.S. Gemi Armatörleri Mot. Taş. Koop.
- Vapur Donatanları ve Acenteleri Derneği
- GİSBİR
- GESAD
- KOSTBİR
- Yalova Altınova Tersane Gir. San. ve Tic. A.Ş.
- YAGESAD
- İMEAK DTO Şubeleri ve Temsilcilikleri

BİLGİ

- Yönetim Kurulu Bşk. ve Üyeleri
- İMEAK DTO Meslek Komite Bşk.
- İMEAK DTO Şube YK Başkanları



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Treasury Targets Supporters of Iran's Islamic Revolutionary Guard Corps and Networks Responsible for Cyber-Attacks Against the United States

9/14/2017

Washington – Today, the U.S. Department of the Treasury's Office of Foreign Assets Control (OFAC) designated 11 entities and individuals for engaging in support of designated Iranian actors or malicious cyber-enabled activity. The persons sanctioned in today's actions include one entity engaging in activities in support of Iran's Islamic Revolutionary Guard Corps (IRGC) ballistic missile program; two Ukraine-based entities providing support to designated airlines, including one affiliated with the IRGC-Qods Force (IRGC-QF); and two Iran-based networks responsible for malicious cyber-enabled attacks against the U.S. financial system. Today's actions were taken pursuant to Executive Order (E.O.) 13382, which targets proliferators of weapons of mass destruction and their means of delivery and their supporters; E.O. 13224, which targets terrorists and those providing support to terrorists and acts of terrorism; and E.O. 13694, which targets persons engaging in significant malicious cyber-enabled activities.

"Treasury will continue to take strong actions to counter Iran's provocations, including support for the IRGC-Qods Force and terrorist extremists, the ongoing campaign of violence in Syria, and cyber-attacks meant to destabilize the U.S. financial system," said Treasury Secretary Steven T. Mnuchin. "These sanctions target an Iranian company providing material support to the IRGC's ballistic missile program, airlines that support the transport of fighters and weapons into Syria, and hackers who execute cyber-attacks on American financial institutions."

As a result of today's actions, all property and interests in property of those designated subject to U.S. jurisdiction are blocked, and U.S. persons are generally prohibited from engaging in transactions with them. In addition, foreign financial institutions that facilitate significant transactions for, or persons that provide material or certain other support to, the entities and individuals designated today risk exposure to sanctions that could sever their access to the U.S. financial system or block their property and interests in property under U.S. jurisdiction.

Sadid Caran Saba Engineering Company (SABA)

Today, OFAC sanctioned Iran-based SABA for proliferation activities related to Iran's ballistic missile program. SABA has provided, or attempted to provide, financial, material, technological, or other support for, or goods or services in support of, the IRGC. The IRGC was designated pursuant to E.O. 13382 on October 25, 2007, for being a key Iranian entity of proliferation concern. The IRGC has been outspoken about its willingness to proliferate ballistic missiles.

Since at least 2014, SABA has entered into contracts to procure and install numerous, multi-ton explosion-proof crane systems for the IRGC Research and Self-Sufficiency Jihad Organization (RSSJO). The RSSJO, which is responsible for researching and developing ballistic missiles on behalf of the IRGC, was designated pursuant to E.O. 13382 on July 18, 2017.

Khors Aircompany and Dart Airlines

OFAC also designated Ukraine-based Khors Aircompany and Dart Airlines pursuant to the global terrorism E.O. 13224 for aiding designated Iranian and Iraqi airlines through the provision of aircraft and services. Both Khors Aircompany and Dart Airlines help Iran's Caspian Air and Iraq's Al-Naser Airlines procure U.S.-origin aircraft, as well as crew and services.

assisted in the same DDoS attacks. Saedi wrote computer scripts used to locate and exploit vulnerable servers to help build the Mersad Co. botnet used in the attacks.

On March 24, 2016, the Department of Justice announced that a grand jury in the Southern District of New York indicted the seven ITSec Team and Mersad Co. associated individuals being designated today.

ITSEC TEAM (a.k.a. AMN PARDAZESH KHARAZMI; a.k.a. "IT SECURITY & PENETRATION TESTING TEAM"; a.k.a. "POOYA DIGITAL SECURITY GROUP"), Unit 2, No. 129, Mir Ali Akbari St, Motahari Avenue, Tehran, Iran; Additional Sanctions Information - Subject to Secondary Sanctions [CYBER2].

KHORS AIRCOMPANY (a.k.a. AVIAKOMPANIYA KHORS, TOV; a.k.a. KHORS AIR; a.k.a. TOVARYSTVO Z OBMEZHENOYU VIDPOVIDALNISTYU 'AVIAKOMPANIYA 'KHORS'; a.k.a. "HORS AIRLINES LTD."), 60 Volunska Street, Kiev 03151, Ukraine; Bud. 34 Bul.Lesi Ukrainky, Kyiv 01133, Ukraine; Lesi Ukraini Bulvar 34, Kiev 252133, Ukraine; Additional Sanctions Information - Subject to Secondary Sanctions; Government Gazette Number 04937956 (Ukraine) [SDGT] [IFSR].

SADID CARAN SABA ENGINEERING COMPANY (a.k.a. SADID CARAN SABA COMPANY; a.k.a. SADID CARAN SABA ENG. CO.; a.k.a. "S.C. SABA ENG CO."; a.k.a. "SABA CRANE"), Unit 501, No. 17, Beside Samen Drugstore, Hakim West Highway, Tehran, Iran; No. 1401, Cross 5th Golazin and 2nd Golara, Eshtehard Industrial Zone, Eshtehard, Alborz, Iran; Additional Sanctions Information - Subject to Secondary Sanctions [NPWMD] [IFSR].