



**Congress of the United States**  
**House of Representatives**  
Washington, DC 20515

October 21, 2021

The Honorable Janet Yellen  
Secretary  
U.S. Treasury Department  
1500 Pennsylvania Ave NW  
Washington, D.C. 20220

The Honorable Antony Blinken  
Secretary  
U.S. Department of State  
2201 C St NW  
Washington, D.C. 20520

Dear Secretary Yellen and Secretary Blinken:

On October 8, 2021, the Treasury Department announced it removed six entries from the U.S. Specially Designated Nationals and Blocked Persons (SDN) list all related to Mammut Industrial Group/Mammut Industries or Mammut Diesel.<sup>1</sup> The former was alleged<sup>2</sup> to be tied to the Shahid Hemmat Industrial Group (SHIG), which is the entity in Iran responsible for Iran's liquid-propellant ballistic missiles<sup>3</sup>, and is a subordinate to Aerospace Industries Organization (AIO), which is a subsidiary of Iran's Ministry of Defense (MODAFL).<sup>4</sup>

These collective "Mammut" named entities were sanctioned by the Trump administration<sup>5</sup> and subject to secondary sanctions penalties, pursuant to Executive Order (E.O.) 13382, a powerful counterproliferation authority the United States retains through an executive order from 2005.<sup>6</sup> In September 2020, the Treasury Department declared that "Mammut Industries and Mammut Diesel are key producers and suppliers of military-grade, dual use-goods for Iran's missile programs. Since early 2000, Mammut Industries has supported the production of ballistic missile equipment for Iran's AIO and specifically, SHIG, Iran's primary developer of liquid propelled missiles. As of late-2019, Mammut Industries continued to support SHIG's production of ballistic missile equipment."

According to open-source assessments, AIO is the chief production entity for Iran's ballistic missiles. More than a decade of assessments to Congress by several Directors of National Intelligence working under Republican and Democratic presidents have declared that Iran has the largest ballistic missile arsenal in the Middle East<sup>7</sup>. It is because of the work of entities like SHIG, AIO, and MODAFL that this was and remains the case. SHIG, AIO, and MODAFL remain subject to secondary sanctions under E.O. 13382. However, reportedly as of October 8, 2021, Mammut Industrial Group/Mammut Industries or Mammut Diesel will be taken off the sanctions list pursuant to a legal filing.<sup>8</sup> This follows earlier delistings from July of this year of three managers of Mammut Industries.<sup>9</sup>

We are committed to investigating all sanctions relief provided to Iran and its allies and working to thwart the regime's long-range strike capabilities. We would like you verify that the delisted entities are no longer engaged in sanctionable conduct under U.S. law, we also ask what other steps the U.S. government is taking to impede Iran's ballistic missile capabilities, which pose a grave risk to U.S. forces, facilities and personnel in the Middle East, as well as key regional allies like Israel.<sup>10</sup>

<sup>1</sup> <https://home.treasury.gov/policy-issues/financial-sanctions/recent-actions/20211008>

<sup>2</sup> <https://home.treasury.gov/news/press-releases/sm1130>

<sup>3</sup> <https://www.iranwatch.org/iranian-entities/shahid-hemat-industrial-group-shig>

<sup>4</sup> <https://www.iranwatch.org/iranian-entities/ministry-defense-armed-forces-logistics-modafal> and <https://www.iranwatch.org/iranian-entities/aerospace-industries-organization-aio>

<sup>5</sup> <https://home.treasury.gov/news/press-releases/sm1130>

<sup>6</sup> See: <https://home.treasury.gov/system/files/126/wmd.pdf>

<sup>7</sup> See, for example: [https://www.dni.gov/files/documents/Newsroom/Testimonies/20070111\\_testimony.pdf](https://www.dni.gov/files/documents/Newsroom/Testimonies/20070111_testimony.pdf) (2007),

[https://www.dni.gov/files/documents/Newsroom/Testimonies/20110310\\_testimony\\_clapper.pdf](https://www.dni.gov/files/documents/Newsroom/Testimonies/20110310_testimony_clapper.pdf) (2011), <https://www.dni.gov/files/ODNI/documents/2019-ATA-SFR---SSCI.pdf> (2019), and <https://www.dni.gov/files/ODNI/documents/assessments/ATA-2021-Unclassified-Report.pdf> (2021)

<sup>8</sup> <https://www.al-monitor.com/originals/2021/10/intel-us-lifts-iran-related-sanctions-says-no-connection-nuclear-deal>

<sup>9</sup> <https://www.reuters.com/world/middle-east/us-drops-sanctions-three-iranians-move-unrelated-nuclear-talks-2021-07-02/>

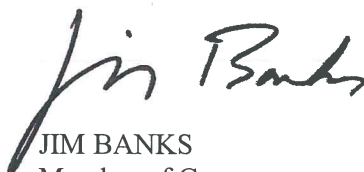
<sup>10</sup> <https://www.fdd.org/analysis/2021/04/27/biden-congress-should-defend-missile-sanctions-imposed-on-iran/>

Finally, we request that you provide this information within 15 days of receipt of this request. Thank you for your time and attention to this matter.

Sincerely,



BRYAN STEIL  
Member of Congress



JIM BANKS  
Member of Congress



JOE WILSON  
Member of Congress



RALPH NORMAN  
Member of Congress



BILL JOHNSON  
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AUGUST PFLUGER  
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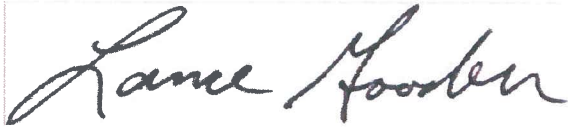
KAT CAMMACK  
Member of Congress



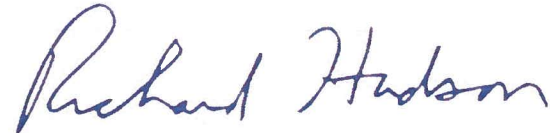
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DAVID KUSTOFF  
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BEN CLINE  
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LISA MCCLAIN  
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DAN CRENSHAW  
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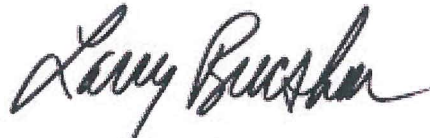
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LARRY BUCSHON, M.D.  
Member of Congress



BOB GOOD  
Member of Congress



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Member of Congress



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Member of Congress