



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

June 14, 2021

Dear Secretary Yellen:

On June 10, 2021, the Treasury Department removed the following individuals and entities from the list of specially designated nationals and blocked persons maintained by the Office of Foreign Assets Control of the Department of the Treasury:

- GHALEBANI, Ahmad
- GHALEHBANI, Ahmad
- QALEHBANI, Ahmad
- MOINIE, Mohammad
- ASM INTERNATIONAL TRADING, LLC
- ASM INTERNATIONAL GENERAL TRADING COMPANY
- ASM INTERNATIONAL GENERAL TRADING LLC
- SILVER PINE
- SILVER PINE DMCC
- SEA CHARMING SHIPPING COMPANY LIMITED
- SEA CHARMING SHIPPING CO LTD
- AOXING SHIP MANAGEMENT SHANGHAI LTD
- SHANGHAI AOXING INTERNATIONAL SHIP MANAGEMENT CO., LTD.
- AOXING SHIP MGMT SHANGHAI LTD

In particular, the lifting of sanctions on entities connected to Syrian oligarch Samer Foz are of great concern. As you are aware, Foz was sanctioned by the Trump administration on June 11<sup>th</sup>, 2019 for being one of the most significant direct funders of the brutal Assad regime's war crimes in Syria. The timing of the delistings on Foz's companies as well as on the Iranian entities coming a few days before the next round of nuclear talks with Iran in Vienna raises major questions.

As members of the Republican Study Committee, we are committed to investigating any and all sanctions relief provided to Iran and its allies. There was inadequate consultation with Congress before these individuals and entities were removed from the SDN list. A Treasury press release stated that "these delistings are a result of a verified change in behavior or status on the part of the sanctioned parties and demonstrate the U.S. government's commitment to lifting sanctions in the event of a change in behavior or status for sanctioned persons." This explanation is inadequate as we have seen no evidence to support this claim.

Therefore, we request that you furnish copies of all documents and communications relating to these delistings to the Members and appropriate Majority and Minority Staff of the Financial Services Committee. We also ask that you verify that these individuals and entities have not engaged in other sanctionable conduct.

Finally, we request that you provide this information within 15 days of receipt of this request/no later than 5:00pm on Wednesday, June 30, 2021. 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