



January 31, 2012
The Honorable Timothy F. Geithner
Secretary of Treasury
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Re: Disrupting the Supply Chain for Syrian Atrocities

Dear Secretary Geithner:

We applaud the Obama Administration's efforts to stem the escalating violence in Syria and end the atrocities and rampant abuse of human rights by government forces there. I am writing to draw your attention to the role of the companies and governments that are enabling these atrocities by supplying the Syrian government and its military the means to perpetrate them and to urge that you use all available tools to disrupt this supply chain.

Last week, the Russian state arms trader Rosoboronexport signed a contract to sell the Syrian government 36 combat jets capable of attacking ground targets. This transaction is one of several where the Russian government has ignored existing arms embargoes in the face of continued attacks by the Syrian regime on unarmed civilian populations. With this sale, Rosoboronexport is providing material support to the Government of Syria which may be used to commit further atrocities against the Syrian people. As such, the Office of Foreign Assets Control (OFAC), which has already levied sanctions against the al-Assad regime, should designate Rosoboronexport for sanctions and disrupt transactions by U.S. persons with the company.

While diplomatic efforts by the United States and others to end Syrian abuses move forward this week at the UN, Syrian government forces continue to perpetrate widespread and systematic attacks on civilians every day. The attacks have so far left over 5,400 dead, most of whom were peaceful demonstrators. In the past few days alone, the Syrian military has killed hundreds of civilians, including women and children, in intensified security operations and indiscriminate shelling of civilian areas. The Rosoboronexport sale will enable further government-sponsored violence. Condemning the sale and sanctioning the company would send a clear message to the Syrian people that the United States will do all it can to disrupt those who enable the killing and persecution of innocent people.

As Secretary of Treasury, you have as-yet unused authority to disrupt the activities of Rosobornexport and similar third-party enablers that provide material support the Syrian government needs to perpetrate its crimes. Under the International Emergency Economic Powers Act (IEEPA), President Obama has declared the human rights situation in Syria a threat to the United States, giving OFAC the authority to sanction entities that perpetrate or support human rights abuses in Syria. Since 2010, OFAC has sanctioned 20 Syrian citizens as well as the Syrian government. Rosoboronexport,

which was sanctioned in the past for violation of the Iran Nonproliferation Act of 2000, should be added to that list, and the U.S. Department of Treasury should investigate whether any U.S. persons have been involved in transactions with the company.

Last year the Treasury Department successfully intervened to block a shipment of oil from Syria to Iran. The Department traced the *Mire*, a Greek owned Eurotankers Inc. vessel to its registration in Liberia, cancelled its American insurance, and halted the shipment. This action helped to maintain the integrity of the U.S. oil embargo imposed on the Assad regime. Given the widespread use of American insurance by international shipping companies, we believe that this tactic could also be used to disrupt shipments of Russian arms to Syria.

We applaud the Administration's diplomatic efforts to resolve the Syrian crisis and curtail the violence there. It is critical that this diplomacy be reinforced by a vigorous effort to disrupt the enablers of Syria's atrocities as well.

We stand ready to work with you; thank you for your attention to this urgent matter.

Sincerely,

Elisa Massimino
President and Chief Executive Officer