



Enablers of the Syrian Conflict

How Targeting Third Parties Can Slow the Atrocities in Syria

March 2013



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Executive Summary

The Syrian conflict is a human rights catastrophe. Over the past two years, nearly 70,000 people have died, mostly civilians, including more than 3,700 children, and nearly one million refugees have fled the country. Although both sides of the conflict are responsible for atrocities, the regime of President Bashar al-Assad is responsible for the vast majority. The regime's security forces have used indiscriminate bombings, intentional mass killings, rape, and torture to kill and brutalize civilians. There is no end in sight.

President Obama has made stopping mass atrocities a "core national security interest" of the United States, which manifestly applies to Syria. As neighboring countries struggle to absorb the nearly one million refugees and regional powers become more involved in the conflict, the possibility of wider violence and instability looms.

Yet U.S. efforts to slow or stop the crisis—diplomacy and sanctions against the regime, primarily—have had little effect. Amid calls to arm the rebels, we urge the United States to approach the conflict from the other end: to choke off the flow of arms, resources, and money to Assad. While no single strategy could resolve this crisis, this low-risk, nonviolent one could help stem the bloodshed and put pressure on Assad to stop the bloodshed.

The Syrian regime's mass atrocities—like all mass atrocities—are complex, organized crimes requiring the support of third party "enablers." This report provides both a unique overview of Assad's enablers and a roadmap the U.S. government can follow to crack down on them.

A number of countries and commercial entities are knowingly or tacitly enabling Assad's atrocities. For example:

- **Russia** has provided military equipment, military advisors, diesel fuel, gasoil, and financial assistance
- **Iran** has provided military equipment, advisors, and personnel, diesel fuel, and financial assistance

- **North Korea** has provided missile technology, other arms, and technical assistance
- **Venezuela and Angola** have sent, or contracted to send, diesel fuel
- Private entities in **Georgia, Lebanon, and Cyprus** have reportedly sent or attempted to send diesel fuel
- An oil trader in **South Africa** brokered Angola's fuel deal with Syria
- A trader in the **UAE** provided Internet filtering devices made by California's **Blue Coat Systems, Inc.**
- Italy's **Finmeccanica** provided radio technology and technical assistance through the Syrian unit of **Intracom-Telecom**, a Greek company
- Italy's **Area SpA** provided an Internet surveillance system, which relied on technology from California's **NetApp Inc.** and **Hewlett Packard**, France's **Qosmos SA**, and Germany's **Ultimaco Safeware AG**

Together, these enablers form a supply chain that passes through the legal jurisdictions of a number of countries with whom the United States has a relationship. Not only do many of the arms and other resources headed for Syria traverse the territory of U.S. allies; many ships fly the flags of countries that are allied with the United States or otherwise susceptible to American influence. Also, the supply chain includes commercial entities—such as insurance providers, oil firms, and shell businesses designed to conceal the ownership of ships—that are located in countries where the United States has leverage.

Given its relationships with these countries—as well as its political, economic, and military reach—the United States is particularly well positioned to disrupt the supply chains. U.S. officials could and should enlist these countries in a systematic effort to deny Assad the support that is enabling atrocities.

To bolster this effort, the U.S. government should take the following steps: **(For full recommendations, see page 23):**

- **The State Department** should publicly and privately pressure enabling countries, share information with the foreign authorities who can aid in disrupting enablers, and direct embassies to collect information on enablers.
- **The Treasury Department** should impose sanctions that prevent U.S. entities from doing business with Assad's enablers and that limit his ability to repatriate funds from oil exports.
- **The Commerce Department** should amend the Export Administration Regulations (EAR) to secure control over the delivery of information and communications technology to repressive regimes like Syria. The department should also work with the industry to promote its best practices, to prevent such technology from enabling atrocities.
- **The Department of Defense** should void its existing contracts with the enablers of atrocities in Syria and

adopt a regulation to prohibit activities with state-owned enterprises, commercial entities, and individuals that enable mass atrocities.

- **Congress** should pass legislation targeting the enablers of Syrian atrocities, which, for instance, could require federal contractors to certify that they are not in business with Assad's enablers and prohibit enabling foreign financial institutions from doing business with American financial institutions.
- **The Atrocity Prevention Board** should actively identify enablers and enact measures to disrupt them in early warning stages of atrocities and in ongoing atrocities.

The report expands Human Rights First's work identifying and tracking the Assad regime's enablers since 2011. It is based on open source information, which is limited due to the exclusion of most foreign reporters from Syria, the secrecy cloaking intelligence and trade information, and the efforts of enablers to evade detection. The cases documented in this report are representative, not exhaustive.

Introduction: The Syrian Conflict and the Role of Enablers

The ongoing atrocities in Syria are a human rights catastrophe. Since the uprising began in March 2011, the death toll has climbed near 70,000. Most of the casualties are civilian, including over 3,700 children and 2,100 women.¹ Though both sides of the war have perpetrated crimes, President Bashar al-Assad's regime is responsible for the vast majority of the atrocities. As widely reported, Assad's forces have perpetrated crimes against humanity, including systematic and widespread aerial and infantry bombardment of civilian areas, indiscriminate attacks, intentional mass killings, massacres, torture, rape, and arbitrary imprisonment. Two years in, Assad's atrocities show no signs of slowing down.

As President Obama stated in the Presidential Study Directive on Mass Atrocities, preventing mass atrocities is "a core national security interest" of the United States.² The U.S. government has taken a number of steps, including diplomatic efforts and extensive sanctions on the regime, to end the crimes in Syria. However, as the conflict deepens, these efforts have thus far failed to effectively address the crisis and end Assad's brutalities. This study identifies another tool the U.S. government can use: by systematically isolating, pressuring, and disrupting the parties that help the regime procure lethal resources, the United States can more effectively stem the atrocities in Syria.

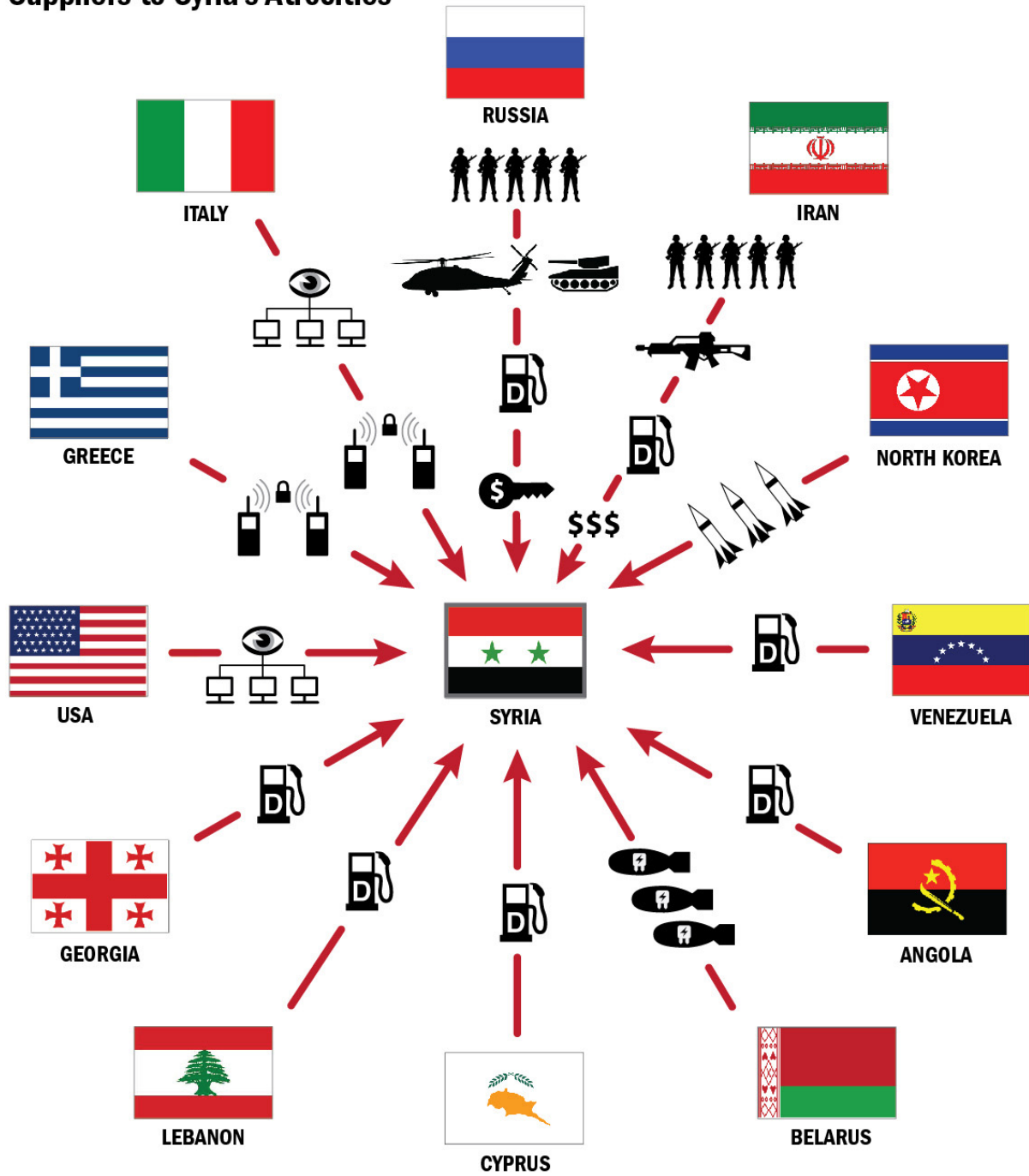
Like all atrocities, Assad's atrocities are complex, organized crimes. They require the assistance of a number of "enablers" – governments, commercial entities, and individuals that provide resources, goods, services, or other support that sustain the commission of atrocities.³ Together, these enablers form a supply chain that fuels

Assad's crimes against humanity. A large number of enablers have provided the Assad regime with military equipment, training, troops, diesel fuel that powers infantry vehicles, financial access to global markets, loans to procure weapons and pay soldiers, repressive Internet surveillance and filtering technology, and other assistance.

This supply chain is an international network that falls within the legal jurisdictions of a number of countries. Given its broad political, economic, and military reach, and its relations with countries with legal jurisdiction over the supply chain, the United States is particularly well positioned to disrupt these enablers. By disrupting these enabling supply chains, the U.S. government can more effectively slow the regime's perpetration of crimes.

This paper is based on Human Rights First's identifying and tracking enablers of the Syrian crisis since 2011. It details some of the assistance that enablers have provided the Assad regime and identifies the legal and diplomatic tools the United States can utilize to disrupt the atrocity supply chain to Syria. This research is based on open source reporting. Open source information on Syria is limited due to the large exclusion of foreign reporters from Syria, the confidential or undisclosed nature of intelligence and trade information, and the evasive tactics enablers use to disguise themselves. However, the instances documented in this report represent the support the regime requires and continues to receive from outside sources. These examples demonstrate how the U.S. government can take steps to target the third parties connected to Syria's procurement supply chain to help stem atrocities in Syria.

Suppliers to Syria's Atrocities



Collaborating Jurisdictions



Overview: The Resources, their Uses, and their Providers

Enablers have sent the regime significant material provisions, including weapons, diesel fuel, financing, and information and communication technology.

Complementing these provisions, international actors are also providing the regime military and technical training, foreign troops, and financial access to global markets. This support is directly traceable to the Assad regime's perpetration of mass atrocities.

Military Provisions, Training, and Troops

The regime has activated the full breadth of its military prowess to perpetrate its killings. Syria's large-platform military weaponry is expansive. It is comprised of tanks, infantry fighting vehicles, armored personnel carriers, attack helicopters, fighter jets, rocket launchers, field artillery, and other equipment.⁴ It is difficult to ascertain whether Syria has procured any new large platform equipment since the start of the crisis in March 2011. However, Syria has procured smaller military supplies, such as assault weapons, sniper rifles, grenades, bomb fuses, ammunition, rockets, and explosives. Syria has also procured spare parts and received maintenance for its large weaponry. Beyond these material provisions, Syria received external military training and foreign troops.

A number of entities have provided this military support, most notably Russia and Iran. **Russia** has sent or attempted to send ammunition, explosives, spare parts, repaired attack helicopters, other munitions, military communication equipment, and military advisors to Syria. **Iran** has sent Syria vast amounts of rifles, machine guns, ammunition, mortar shells, and other arms. Iran has also helped Syrian ships evade detection, allowing those ships to quietly transport more arms into Syria. Reports document Iranian troops present in Syria, and U.S. officials believe Iranian troops have helped train Assad's forces.

Publicly available information shows that other actors are also providing military support. **North Korea** has attempted to send Syria parts for short-range ballistic missiles, and North Korean scientists have worked

alongside Iranian scientists inside Syria to improve the regime's ballistic missile capabilities, increasing the effectiveness of a possible chemical weapon attack. North Korea has also attempted to send other lethal provisions, likely weapons or weapon manufacturing equipment, to Syria. Further, the United States has sanctioned an arms exporting firm of **Belarus**, for preparing to send aerial bomb fuses to Syria.⁵

Diesel Fuel and Gasoil

As one Syrian activist described it, diesel fuel is the "lifeblood of the killing regime."⁶ Nearly all heavy ground vehicles in Assad's arsenal, including tanks, infantry fighting vehicles, and heavy transportation vehicles run on diesel. As widely reported, Assad has used the full scope of this ground arsenal to indiscriminately attack civilian targets, including hospitals and residential areas, to cordon off districts prior to attacking, and to massacre civilians.

Syria is highly dependent on foreign provisions of diesel. While Syria produces light crude oil domestically, it does not have the capacity to produce or refine sufficient amounts of diesel to meet even its pre-conflict domestic requirements. Before the uprising, in 2009, Syria imported nearly three million tons of diesel, about half its total consumption, to meet industry and transportation requirements. Since the start of the uprising and the imposition of E.U. and U.S. sanctions limiting supplies, demand for foreign diesel has skyrocketed, while Syria is left with a surplus of its own light crude oil, which it previously exported to generate significant capital. As of May 2012, Syria had imported over two million tons of diesel fuel during the crisis, according to the Syrian Minister of Petroleum and Mineral Resources.⁷ Foreign diesel provisions have continued since then from a variety of sources.

Russia has sent large quantities of diesel and gasoil, a heavy fuel that can substitute for diesel. In early 2012, Russia sent several diesel shipments every month to Syria; though these shipments temporarily dried up, in December 2012 Russia resumed diesel shipments to

Syria. **Iran** has sent large volumes of diesel to Syria as well, swapping its excess diesel for much-needed Syrian light crude oil, helping Assad secure diesel for his ground arsenal, preserve capital through a commodity swap, and receive value for its hard-to-sell excess domestic crude.

In 2012, **Venezuela** provided the regime over 100,000 tons of diesel, again in a commodity swap. **Angola**, in a deal brokered by a firm in **South Africa**, contracted to provide the regime 240,000 tons of diesel. Private actors in **Lebanon** have smuggled diesel into Syria, and reports indicate that ships from **Georgia** have carried diesel to Syria. **Algeria** has discussed diesel provisions with Syria. A firm named Aurora Finance Ltd., with registered owners in **Cyprus** and commercial connections to the United Kingdom, Malaysia, and India, attempted to have a firm in Singapore send 200,000 tons of diesel from Malaysia to Syria.⁸

Financial Assistance

Western sanctions imposed on the Assad regime are designed to choke off Syria's access to the financial marketplace, deplete Syria's foreign currency reserves, and pressure the regime's supporters to peel away from the regime. However, foreign loans are undercutting these sanctions, as are foreign banks that allow Syria financial access, and foreign entities minting of Syrian currency. Syrian bank accounts in **Russia** allow Syria to pay for imports and receive funds for exports, while Russia also is printing banknotes for Syria. Large loans and an extensive import credit line from **Iran** help Syria maintain its foreign

exchange reserves, continue procuring the resources central to its crackdown, and pay salaries for troops.

Information and Communication Technology, and Other Dual-Use Equipment

Repressive Internet technology is a central element of the regime's atrocities. Government forces have used their surveillance information to track and target citizen bloggers and freelance journalists, and have arrested, tortured, and killed civilian Internet users for their online activity.⁹ Beyond Internet technology, military communication technology also strengthens the killing capacity of the regime.

Several Western firms are connected to Syria's procurement of Internet filtering and surveillance technology and radio equipment used in helicopters. **Blue Coat Systems, Inc.**'s proxy filtering devices entered Syria from the United States through the UAE. The Italian firm **Area SpA** designed an unfinished Internet surveillance system for the regime, incorporating technology from entities connected to the United States, France, Germany, and the United Kingdom. A unit of the Italian conglomerate **Finmeccanica** sent radio technology to Syrian security officers through the Syrian unit of the Greek company **Intracom-Telecom**, and its employees trained Syrian technicians on using communication equipment in helicopter terminals in February 2012.

Analysis: The Pressure Points

A number of these enabling countries and firms have connections to the United States through trade relationships and business operations. These connections provide the United States opportunities to influence these countries and firms to reconsider their enabling relationship with Syria.

For instance, the Russian arms exporting agency RosOboronExport (ROE), which is providing arms to the Syrian regime under existing contracts, also has a large contract with the Department of Defense to supply helicopters for use in Afghanistan. Angola's state-owned oil company, Sonangol, has operations in Texas and in the U.S. Gulf of Mexico, while reportedly contracting to provide diesel to the Syrian regime. Finmeccanica and Intracom-Telecom, a company connected to the reported transfer of Finmeccanica's technology to Syria, have operations inside the United States, and Finmeccanica has secured a number of U.S. contracts. Venezuela's state-owned oil company Petróleos de Venezuela, S.A (PdVSA), while exporting diesel to Syria, has significant downstream operations in the United States.

Beyond capitalizing on these direct commercial relationships, the United States can also work with other, secondary actors to disrupt these enablers. Enablers rely on complex supply chains comprised of commercial and individual actors, operating across multiple jurisdictions, to facilitate their provisions. These secondary actors and jurisdictions include transportation routes, flag countries, countries in which shell companies incorporate, commercial actors connected to the provisions and the countries in which they operate, and banks arranging payments for transfers. These secondary actors and jurisdictions create opportunities for the U.S. government to exercise authority or engage its partners with authority to slow the flow of lethal resources that enable atrocities in Syria.

Transportation Routes

Various transportation routes are recurrent in the transfer of arms and diesel to Syria. Shipments by sea from Iran transit through the Suez Canal, under Egyptian control,

prior to entering Syria and may enter Yemeni or other states' jurisdictions as well. Diesel shipments from Russia transiting through the Black Sea travel through the Bosphorous in Turkey, under Turkish jurisdiction, while weapons shipments traveling from the Baltic enter the jurisdiction of various E.U. entities. Other shipments may enter Cypriot jurisdiction, as well as the jurisdiction of other countries in the Eastern Mediterranean or elsewhere in their travel routes. These coastal states can inspect and interdict certain shipments to Syria that travel through their territorial waters in violation of their laws.

Some lethal provisions to Syria by air initially involved transit through Turkey; however, after Turkey took steps to inspect suspected arms flights to Syria, Russia, Iran, and North Korea have all attempted to instead use Iraq as an arms corridor, with Russian transfers also traveling through Azerbaijan and Iran. Although Iraq has taken some steps to inspect and stop some flights to Syria, arms and other resources have flown through Iraq because of the ad hoc nature of Iraqi inspections, inability to successfully interdict planes, and a lack of will from the Iraqi government. Further, Iraq, as well as Lebanon, may also be corridors through which weapons and fuel reach the regime by land. These countries can prevent enablers from transporting these lethal resources.

Flag Countries, and Countries in Which Shell Companies Incorporate

Parties providing arms or diesel to Syria regularly use foreign flags, including a variety of flags of convenience, offered by countries with no true connection to a shipment in exchange for a fee. The use of these flags helps these providers remain anonymous and evade detection. These parties also freely incorporate shell companies in a number of countries, and use these shell companies or other third parties to hide their true ownership or control over a shipment traveling to Syria. Though this system of jurisdictional arbitrage helps enablers hide the origin and nature of certain shipments, it also creates an opportunity to shut down certain supply chains. The countries under whose flags these vessels travel have legal authority over

shipments en route to Syria. The countries in which shell companies or other connected third parties incorporate can also exercise jurisdiction to prevent shipments.

For instance, Iranian diesel provisions to Syria have exploited shell companies or flags under the jurisdiction of a number of these countries. These include Belize, Bolivia, Honduras, Malta, the Marshall Islands, Panama, Sierra Leone, and Togo. Iran has also registered ships in Tanzania, through a firm in the UAE, and transmitted false signals from these ships to help Syrian ships evade detection. Russian arms provisions have used shell companies or flags under the jurisdiction of a number of countries, including Curacao, the Marshall Islands, St. Vincent and the Grenadines, and possibly Malta and Cyprus. Russia has also sent diesel on Italian-flagged vessels. North Korea attempted to transfer parts for ballistic missiles aboard a Chinese flagged vessel. These flag states and countries with jurisdiction over shell corporations could all have exercised controls to prevent these shipments.

Commercial Actors Connected to Resource Provisions, and the Countries in which they Operate

The commercial actors in the lethal supply chain include vessel chartering companies, shipping companies, transaction brokers, cargo insurers, and the commercial parties that have created, exported, and reexported the information and communication technology that has ended up in Syria. These parties are themselves at a unique position to stop the flow of lethal resources to Syria. Where

these parties do not themselves act, countries with jurisdiction over them can use their authority to prevent them from enabling crimes in Syria.

Examples of these entities include multinational insurance providers based in Bermuda, Norway, Sweden and the United Kingdom that have all been linked to lethal arms or diesel provisions to Syria. Corporate entities based in many countries, including Cyprus, India, Malta, Monaco, the Netherlands, South Africa, the UAE, and the United Kingdom are connected to transfers or attempted transfers of diesel and arms to Syria. Information and communication providers in France, Germany, Greece, Italy, the United Kingdom, and the United States all are connected to dual-use technology transfers to Syria and can be subject to governmental controls to prevent these transfers. These entities, and the countries in which they operate, can all exercise controls to prevent their goods and services from facilitating lethal resource provisions.

International Banks

A number of Russian banks are reportedly doing business with Syria, allowing Syria to pay for their imports and receive funds for their exports. These banks include Vnesheconombank (the Bank for Development and Foreign Economic Affairs), Vneshtorgbank (the Russian foreign trade bank), and Gazprombank (the lending affiliate of Russia's natural gas monopoly). According to publicly available information, these Russian banks retain correspondent accounts with entities in the United States. These banking relationships provide opportunities for the United States to further shut down Syria's global financial access and increasingly isolate the regime.

Russia

Throughout the Syrian uprising, Russia has remained one of Assad's staunchest allies and most visible enablers. Russia's support for the regime extends beyond political cover, which Russia has offered along with China through vetoes on three separate resolutions before the U.N. Security Council.¹⁰ Russia's support also includes the continual provision of military equipment via air and sea, supplies of diesel fuel that powers Syria's infantry weaponry and tanks, and financial access that helps the regime fund its crimes.

Military Equipment

Activists and journalists have widely reported on the extensive presence of Russian military equipment and weaponry inside Syria and the regime's security forces and militia's uses of these munitions to perpetrate atrocities. Russian mortar shells and explosives, attack helicopters, tanks, infantry vehicles, ammunition, sniper rifles, assault rifles, and other arms are central to the regime's ability to carry out indiscriminate attacks on civilian areas and other atrocities. A significant portion of Syria's military arsenal is comprised of weapons and platforms that are of Russian or Soviet origin, and trade reports indicate that Syria received most of this arsenal before the targeted violence against civilians began in March 2011. However, Russia continues to provide the Syrian regime with many of the resources necessary to keep these platforms operational.

Through its state-owned arms exporting agency, ROE, Russia has reportedly provided or attempted to provide the Syrian regime with ammunition, explosives, spare parts, weapon maintenance and repair, and military communication equipment since the start of the uprising. These provisions are part of extensive existing contracts between Russia and Syria, which in 2012 were worth about \$4 billion.¹¹ In addition, Russia has also provided upgraded air defense missile and radar systems to Syria, emboldening the regime's actions by making it more resistant to foreign intervention. Russian military advisors have also reportedly operated inside Syria, providing the

technical expertise and manpower for the regime to run this equipment.¹²

The examples below are some of the documented instances of known, likely, or attempted military equipment transfers from Russia to Syria during the Syrian uprising. Given the secretive nature of these transfers, this is likely only a small sample of the full scope of the trade. They also do not account for arms Russia may have transported to Syria via warships that have sailed into Russia's naval base in Tartus, Syria.¹³ These shipments do, however, represent the critical military support Russia continues to provide Syria and the important role that foreign actors and jurisdictions play in the transfer of Russian arms to Syria.

Military Equipment—Maritime Provisions

Russia's assistance to Syria is in part through maritime shipments of arms material. For instance, in January 2012 – nine months into the Syrian uprising – the Russian-operated and St. Vincent & Grenadines-flagged ship *Chariot* attracted international headlines for delivering nearly 60 tons of ammunition and explosives from St. Petersburg to the Syrian port of Tartus. Cypriot authorities briefly halted and inspected the shipment in Cyprus and uncovered the munitions; however, after falsely telling authorities the vessel would not go to Syria, the vessel continued on to Syria where it unloaded the cargo. An international brokering company, Balchart, arranged the shipment. Balchart's partners, according to its website, include ROE, the Islamic Republic of Iran Shipping Lines (IRISL, an entity sanctioned by the United Nations), and a host of other firms - notably firms doing business in the United States and European Union. This provision of ammunition and explosives strengthened the regime's firepower and ability to perpetrate atrocities. Before and since the delivery, Syrian security forces have used ammunition and explosives to attack civilian areas.

In May 2012, the Russian-flagged *Professor Katsman* sailed into Syria carrying what activists, reporters, and diplomats believed to be arms. News of this possible arms

shipment from Russia to Syria led to mounting international pressure on UCL Holding, a large international shipping firm with operations inside Russia and the Netherlands, which was the beneficial owner of the ship.¹⁴ UCL Holding subsequently disclosed documents related to an internal investigation of the shipment. While the company would not provide any customs information, disclosed shipping documents stated that the cargo consisted of “spare parts (rotor blades)” and other cargo. Spare parts and rotor blades, though not weapons provisions in-and-of themselves, keep attack weaponry functional, and such a shipment facilitates the regime’s ability to keep using attack helicopters to target civilian areas.

In June 2012, as international criticism of the Russian role in the Syrian atrocities mounted, a third shipment, the Russian-operated, Curacao-flagged *Alaed* attempted to send at least three repaired Mil-25 attack helicopters to Syria. The shipment, part of a larger contract for helicopter repair,¹⁵ coincided with a pattern of increased aerial attacks by the regime on civilian areas. The vessel, en route from Kaliningrad to Syria, traveled roughly the same route as the *Chariot* and *Professor Katsman*. Relying on flag-state jurisdiction, Dutch authorities hailed the vessel as it attempted to travel towards the English Channel. To avoid being halted, the *Alaed* changed course and tried instead to sail along the Western coast of England. Authorities leaned on the ship’s London-based insurer to remove coverage from the ship for a possible violation of E.U. sanctions on Syria. This coordinated international action forced the ship to travel to Murmansk, Russia and unload its cargo. The European Union subsequently passed sanctions designed to stop such shipments, obligating E.U. states to inspect vessels passing through their territorial waters if there are reasonable grounds to believe the ship is carrying arms or other sanctioned items to Syria.

Military Equipment—Aerial Provisions

After the attempted shipment aboard the *Alaed*, Russian authorities stated that they would continue to perform under existing arms contracts with Syria. In October 2012, Turkish fighter jets intercepted a Syrian Air passenger plane flying through Turkish airspace from Moscow to Damascus, forcing it to land due to suspicions the plane was carrying munitions. Russian authorities denied transporting military equipment on the plane. The Turkish Prime Minister Recep Tayyip Erdogan contradicted those

denials, telling reporters “these were equipment and ammunition that were being sent from a Russian agency . . . to the Syrian Defense Ministry.”¹⁶ Turkish media reported that Turkish authorities confiscated cargo from the plane, including radios, antennae, and possibly missile parts. This attempted transfer violated unilateral Turkish sanctions imposed on the Syrian regime, and possibly violated international aviation laws that prohibit the transfer of military equipment on passenger flights.¹⁷

Since Turkey forced the Syrian Air plane to land, Russia has attempted to send military equipment and other items to Syria through a more indirect aviation route, traveling from Moscow through Azerbaijan, Iran, and Iraq to Damascus. Flight documents show that Russia attempted to arrange four separate flights in November and December 2012, each sending a repaired Mi-25 attack helicopter to Syria. These attack helicopters are likely either the same helicopters ROE attempted to send aboard the *Alaed*, or similar helicopters repaired under the same contract. The 150 Aircraft Repair Plant in Kaliningrad, which had repaired the helicopters aboard the *Alaed*, attempted to charter these four flights to Syria.¹⁸ The Iraqi government in December 2012 announced that it denied airspace for these four shipments.

The coordinated actions from a host of international actors to terminate aviation and maritime arms routes from Russia to Syria reflect an international acknowledgement of the importance of disrupting enabling supply chains. However, action to stop these shipments and flights has remained ad hoc, undercutting its effectiveness. For instance, while Iraqi officials state that the four flights carrying helicopters from Russia to Syria were denied airspace, Russia has used the same aviation route across Azerbaijan, Iran, and Iraq to send newly minted bank notes to the regime (see below). Iran has also used this airspace to transport military equipment to Syria (see Iran section below).

Diesel Fuel and Gasoil

Except for a brief pause in 2012, Russia’s supplies of diesel fuel to the Syrian regime have largely flowed uninterrupted throughout the conflict. These provisions are directly linked to atrocities. Diesel powers all of the regime’s tanks and its entire ground infantry fleet, and is necessary to transport regime fighters and military supplies. Tanks and infantry vehicles are instrumental in perpetrating widespread, systematic, and indiscriminate attacks on civilian areas, as well as other crimes against

humanity. As Russia continually sends diesel to Syria, Assad has been able to keep his diesel-fueled weapons operational to cordon off and shell civilian areas.

Between winter 2011 and April 2012, Russia provided the regime significant volumes of diesel and gasoil, a heavy oil which can be marketed and used as either heating oil or diesel. Traders and shipping sources state that Russia regularly provided diesel and gasoil to the regime throughout the 2011 winter.¹⁹ Russia reportedly sent a shipment of gasoil to the Syrian regime in April 2012.²⁰ One source provided Reuters with data showing that between January and April 2012 as many as nine shipments a month of gasoil were delivered to Syria, mostly from Russian ports, with cargoes averaging about 30,000 tons of fuel.²¹ This rate roughly equals the rate at which Syria procured diesel before the start of the crackdown.

In the summer of 2012, these shipments temporarily halted as Western sanctions took grip. For instance, in April 2012, Galaxy Energy Group Ltd., a Monaco-based shipper, delivered a shipment of refined oil from Russia to Syria aboard the Maltese-flagged *Cape Benat*, a ship receiving insurance coverage from the Steamship Mutual Underwriting Assn. Ltd. in Bermuda. The shipper told Reuters after that shipment that E.U. sanctions later forced him to halt his operations with Mahrukat, the Syrian government's petroleum storage and distribution company.²²

In August 2012, Syrian officials stated that they were preparing to complete a deal to trade crude oil with Russia in exchange for diesel and other oil products.²³ And in December 2012, Russia delivered two more shipments to Syria, carrying around 42,000 tons of gasoil in total. The two shipments, aboard the Italian-flagged vessels *Ottomana* and *Barbarica*, traveled through the Bosphorous Strait, under Turkish jurisdiction, and received insurance coverage from the large Norwegian protection and indemnity club Gard A.S. The Italian tanker firm delivering the shipments, Mediterana di Navigazione SpA., did not disclose the charterer or recipient but stated that they conducted due diligence to verify that the shipment did not violate E.U. sanctions.²⁴

Financial Support

Russia has also reportedly allowed Syria to continue accessing the global financial system through accounts in at least three major Russian banks, which all hold

correspondent accounts with other banks globally. Documents reviewed by the *Wall Street Journal*, spanning March through early July 2012, discuss the formation of offshore companies in Russia and Malaysia and the activation of bank accounts in Russia in ruble and euro denominated accounts, designed to pay for imports and receive funds for exports.²⁵ Russia's financial support also includes printing and transporting bank notes into Syria, and Russian officials have discussed providing loans to the Syrian regime.

In 2011, the *Financial Times* and the *Syria Report* reported that the Central Bank of Syria opened accounts at three separate Russian banks – Vnesheconombank (the Bank for Development and Foreign Economic Affairs), Vneshtorgbank (or VTB, the Russian foreign trade bank), and Gazprombank, the lending affiliate of Russia's natural gas monopoly.²⁶ These banks are all large entities, maintaining correspondent accounts with entities in the United States and with commercial partners inside the United States. For instance, as of 2011, VTB has a U.S. unit, VTB Capital, licensed to trade stocks in the United States.²⁷

In February 2012, Syria's oil-marketing company Sytrol listed Gazprombank as a bank through which buyers of Syrian crude oil could clear payments. In March 2012, Syrian officials traveled to Moscow and met with Gazprombank officials and exchanged information to facilitate electronic money transfers.²⁸ Gazprombank told the *Wall Street Journal* that it did not engage in ongoing business with Syrian financial institutions. Correspondence from June 2012 between Sytrol and a Dubai-based oil trader from June 2012 cites the Moscow-based Novikombank, one of Russia's largest banks, as Sytrol's "nominated bank" to receive money. It is not clear whether Sytrol received any payments through Novikombank, and bank officials stated that it did not do business in Syria.²⁹ These potentially ongoing banking relationships are especially troubling because they allow the Syrian regime to continue procuring diesel, arms, and other resources while selling its own crude oil to generate capital.

According to flight records obtained by *ProPublica*, Russia is also transporting bank notes into Syria through flights from Moscow to Damascus, traveling indirectly through Azerbaijan, Iran, and Iraq.³⁰ Flight manifests show eight separate flights between the two cities each transported 30 tons of bank notes between July and September 2012. Members from Goznak, the Russian firm that prints money

for several countries, confirmed minting and sending money to Syria. Syrian officials have also asked Russia for a loan of up to \$2 billion,³¹ and in February 2012 negotiated a comprehensive loan program with Russia to finance domestic projects.³² These actions undercut the effectiveness of sanctions against minting money for the Syrian regime. They allow President Assad to continue

paying troops and procuring lethal resources, buffer his regime from the impacts of sanctions, and slow the rate at which the regime depletes its currency reserves.

Iran

Iranian leadership has enabled the Assad regime's atrocities through comprehensive efforts to provide the regime with military equipment and manpower, diesel fuel, an export market for Syria's light crude oil, and financing. United in part on sectarian grounds,³³ Iran has remained one of Assad's staunchest allies throughout the conflict, and has continued providing significant material assistance to the regime despite strict international sanctions on the Iranian government and E.U. and U.S. sanctions on Syria.

Military Personnel and Assistance

Iran's support for Syria includes the presence of Iranian troops inside Syria, technical assistance, and training for Syrian forces. According to a confidential intelligence report obtained by Reuters, Iran at one point during the conflict used civilian aircraft on a nearly daily basis to transport members of the Iranian Islamic Revolutionary Guard Corp's (IRGC) Qods Force and "tens of tons of weapons" into Syria through Iraq.³⁴ Defense officials believe Iran is also helping the Syrian regime build and train a militia to assist the Syrian regime forces,³⁵ and the State Department and Treasury have accused the IRGC, in conjunction with Hezbollah, of training the regime's paramilitary forces inside Syria.³⁶

IRGC involvement is increasingly documented inside Syria. In August 2012, a group of Syrian rebels kidnapped 48 Iranian nationals in Damascus. In January 2013, they were later freed in exchange for 2,130 persons (including women and children) held prisoner by the Assad regime.³⁷ Iranian officials claimed that these people were civilian Iranian pilgrims, while the rebels charged that the men were troops with identification demonstrating they were members of the IRGC, a claim that U.S. officials believed was true.³⁸ The Iranian foreign minister later stated that some of the captives were retired IRGC members, while Iranian opposition media named four of the men and described them as current commanders.³⁹ The head of the IRGC confirmed later that its members were in Damascus, though in a limited capacity,⁴⁰ while IRGC members have stated that Iran is sending hundreds of rank and file IRGC

members to Syria, along with members of the *basij*, a volunteer militia subordinate to the IRGC.⁴¹

Military Equipment

On March 19, 2011, as the crisis in Syria was about to erupt, Turkish authorities seized weapons cargo originating in Iran and due for Syria. The cargo, listed as "auto spare parts" on transportation documents and transported aboard an Iranian cargo aircraft operated by Yas Air, a private Iranian operator, in fact consisted of "19 crates containing assault rifles, machine guns, ammunition, and mortar shells."⁴² The shipment's rifles, machine guns, nearly 8,000 rounds of ammunition, 560 60-mm mortar shells and 1,288 120-mm mortar shells would further augment the Assad regime's firepower and enable it to perpetrate atrocities. The U.S. Treasury later designated Yas Air for sanctions for transporting weapons and cargo on behalf of the IRGC Qods Force.⁴³

U.S. and U.N. sources indicate that Iran continues to provide arms to Syria,⁴⁴ as well as military communications equipment. As the conflict has progressed, U.S. intelligence reports indicate that Iran ceased using Turkey as a corridor for arms to Syria, but has instead regularly transported the arms to Syria through Iraq since the U.S. withdrawal from the country.⁴⁵ Senior American officials believe that Iran has used Iraqi airspace to transport weapons to Syria since early in 2012, transporting cargo aboard Yas Air or Syrian government cargo planes.⁴⁶ Iraq had briefly cracked down on such flights after the Obama Administration engaged the Iraqi Prime Minister in late March 2012 to stop the flights. However, after a bombing in Damascus that killed high ranking members of the Assad regime, Iran resumed flying arms and supplies to Syria through Iraq in July 2012.⁴⁷ The actors connected to these flights, including U.S. sanctioned Iranian airline Mahan Air, have previously transported men, supplies, and money for the IRGC Qods Force and Hezbollah.⁴⁸

After Iranian flights carrying weapons to Syria resumed in July 2012, the U.S. government has tried to pressure Iraqi authorities to ground, inspect, and disrupt them. Secretary of State Hillary Clinton secured a commitment from the

Iraqi foreign minister to inspect flights from Iran to Syria.⁴⁹ However, under that agreement, Iraq only inspected two flights, both in October 2012. On one of these occasions, Iraqi officials inspected a plane that had already unloaded cargo in Syria and was returning to Iran.⁵⁰ On the other occasion, American intelligence reports indicate collusion between Qassim Suleimani, the leader of the IRGC Qods Force, and Iraqi officials to ensure beforehand that the flight would carry only humanitarian goods and be grounded.⁵¹ Noncooperation is an issue as well—on at least one occasion, an Iranian flight ignored requests to land in Iraq.⁵² This non-enforcement allows a large volume of arms flights from Iran to Syria to continue traveling through Iraq.⁵³

Iran has also helped Syrian ships go unnoticed while transporting material, possibly arms, from Libya into Syria. Since October 2012, at least three Iranian tankers have transmitted inaccurate shipping signals, by falsifying GPS data and pretending to be Syrian vessels. This cover has allowed at least one shipment of crates carrying undisclosed cargo into Syria, arranged by ISM group, a Syrian based shipowner that earlier in 2012 attempted to ship weapons from Libya to Syria. A firm in the UAE, Philtex Corporation, registered the Iranian tankers in the Tanzania registry, allowing it to sail under a Tanzanian flag.⁵⁴ The U.S. government later investigated the matter with Tanzania and the UAE firm.

Diesel and Oil Export Channels

Beyond ground and air, Iran is also likely using maritime transport routes to send arms to the Syrian regime and to help Syria exchange surplus oil for diesel fuel it cannot refine domestically. Reports indicate that Iran is providing Syria with diesel necessary to power infantry vehicles and tanks in Syria. In exchange, Iran is receiving Syria's lighter crude oil, helping Iran offset a gasoline shortage.⁵⁵ Beyond swapping commodities, Iran may be helping Syria export its own excess crude oil to other markets.⁵⁶

As mentioned above, the Assad regime has routinely used tanks and infantry vehicles powered by diesel to perpetrate atrocities by cordoning off and indiscriminately shelling entire neighborhoods and densely populated civilian areas. Further, allowing Syria to trade its excess crude for diesel, or helping the regime export its crude oil for capital, slows the rate at which Syria exhausts its foreign reserves and allows it to procure more munitions and fuel, thereby extending the atrocities.

There are a number of documented oil transfers and swaps between the two countries since the start of the uprising. It is unlikely that these transfers are the only exchanges between the countries, given the highly evasive methods undertaken to avoid interdiction. Iran has generally gone to great lengths to obfuscate its ultimate ownership of vessels to evade sanctions, making detection and interdiction of such transactions very difficult. A U.N. Security Council Iran Sanctions Committee Panel of Experts report, for instance, notes that from 2008 until mid-2012, the Islamic Republic of Iran Shipping Lines (IRISL) and its related companies have changed the registered and beneficial owners of its approximately 130 vessels over 220 times.⁵⁷ IRISL has also routinely reflagged and renamed its vessels, and it has also used third parties and bearer instruments—which convey title to property without a record of ownership—to further evade detection.⁵⁸

In October 2012, Iran sent a Honduran-flagged oil tanker named the *Hillari* loaded with refined fuel from the Persian Gulf port Bandar Abbas into the Syrian port of Baniyas. The vessel made at least two similar prior trips from Iran to Syria, where it was known as the *Alvan* and flew the Panamanian flag.⁵⁹ In April and June 2012, Iran transported Syrian crude aboard the *Amin*, which during its latter voyage from Syria to Iran switched from a Sierra Leonean flag to a Togolese flag after Sierra Leone responded to international pressure and revoked its flag; the ship also switched its ownership from a Maltese company to a Belizean company.⁶⁰ Further, in March 2012, a Maltese-flagged Iranian tanker named the *MT Tour* arrived in the Syrian ports of Tartus and Baniyas, loaded up with light Syrian crude oil, changed its ownership structure to a company registered in the Marshall Islands and began flying a Bolivian flag before returning to Bandar Abbas.⁶¹ Shipments from Iran to Syria travel through the Suez Canal.

The U.S. Department of Treasury has issued advisories to shippers, importers/exporters, and freight forwarders of some of the fraudulent practices IRISL has used to evade international sanctions, facilitate its shipping business, and finance transactions. These practices include “(1) using container prefixes registered to another carrier; (2) omitting or listing invalid, incomplete or false container prefixes in shipping container numbers; and/or (3) naming non-existent ocean vessels in shipping documents.”⁶² To combat “active and ongoing attempts at sanctions evasion,” related to IRISL’s weapons of mass destruction (WMD) proliferation activities, the Office of Foreign Assets

Control (OFAC) has advised shipping entities to “exercise enhanced due diligence to ensure that they do not unwittingly process fraudulent shipping documents or facilitate prohibited activities,” in part by making sure to “check the bona fides of unfamiliar entities issuing shipping document” and verifying “the accuracy of container numbers, particularly when unfamiliar with the issuer of the shipping documents.”⁶³ OFAC has also advised the maritime industry to be alert to IRISL presenting false registration certificates.⁶⁴ Greater knowledge of IRISL’s practices and acceptance of OFAC’s recommendations can help prevent entities in other countries from facilitating lethal Iranian shipments to Syria.

Financing

The *Times of London* reports that Iran may have spent as much as \$10 billion to support the regime, including not only logistical support and weapons but also by paying the salaries of Syrian government troops.⁶⁵ In May 2012, sources told CNN that the Syrian regime was receiving a “cash infusion from Iran through Lebanese banks.”⁶⁶ And in August 2011, Iran reportedly agreed to fund a new military base at Latakia airport near the Syrian coast, to help facilitate military transfers between the two countries.⁶⁷ This financial assistance helps the Assad regime maintain capital, thereby enabling it to sustain its power and continue its crackdown.

North Korea

North Korea, which is under U.N. sanctions designed to curb its exports of arms-related material and its procurement of weapons of mass destruction (WMD) material, has attempted to strengthen the Assad regime's military forces. Reports indicate that commercial entities inside North Korea have attempted to ship missile technology and other arms to Syria prior to and during the crisis.

Missile Technology

North Korea is enabling the Syrian regime through continued missile technology provisions, as well as through technical and engineering assistance with Scud missiles, a short-range ballistic missile capable of delivering chemical agents.⁶⁸ The missile technology supply and assistance is highly alarming given the vast chemical weapon stockpiles inside Syria. Some analysts believe that as the crisis evolves, Assad may use or threaten to use missiles tipped with chemical weapons.⁶⁹ Western officials are also concerned that a security breakdown could allow Islamic militants to seize chemical weapons.⁷⁰ The use of chemical weapons threatens to dramatically raise the already grave civilian death toll. Further, the Syrian regime has used non-chemical Scud missiles during the conflict.⁷¹ These missiles are notoriously inaccurate, and their use has resulted in massive civilian casualties.⁷²

Western intelligence reports show that the Assad regime has combined agents and actively sought to expand its chemical weapon arsenal during the conflict.⁷³ It has also reportedly attempted to procure industrial quantities of isopropanol and methylphosphonyl difluoride, the two binary agents used to prepare Sarin gas, though the source of these attempted transfers is unclear.⁷⁴ The Australia Group, an informal multinational organization designed to combat the spread of chemical and biological weapons, stated in a meeting in June 2012 its concern about "the extensive tactics – including the use of front companies in third countries – the Syrian government uses to obscure its efforts to obtain" items for proliferation purposes.⁷⁵

In May 2012, North Korea attempted to ship 445 graphite cylinders, parts usable and likely intended for use in ballistic missiles, to Syria.⁷⁶ This attempted shipment, aboard the Chinese-flagged ship *Xin Yan Tai* insured by The Swedish Club, was designated for a Syrian company named Electric Parts, possibly a North Korean subsidiary of the company that exported the parts. South Korean authorities seized the shipment, which was in violation of U.N. Security Council embargoes on North Korea. Chinese and South Korean authorities are jointly investigating the shipment. In March 2013, new U.N. sanctions on North Korea obligate China to "inspect all cargo within or transiting through their territory" originating in or destined for North Korea where there are "reasonable grounds" to believe the shipment may contravene existing sanctions.⁷⁷

In June 2012, despite U.N. sanctions prohibiting North Korean security-related exports, North Korean scientists reportedly worked with the Assad regime to upgrade Syria's Scud D missiles' accuracy and ability to defeat interceptors.⁷⁸ Engineers from the Tangun Trading Corporation (Tangun) in North Korea worked with officials from Syria's Scientific Studies and Research Center (SSRC) on the missile development project.⁷⁹ In August 2012, the regime reportedly tested missile systems devised for delivering chemical agents. This testing occurred at a chemical research facility near Aleppo, a facility where North Korean and Iranian scientists reportedly work.⁸⁰

A report issued by the U.N. Security Council's North Korea Sanctions Committee Panel of Experts confirms a long-standing missile relationship between North Korea, Iran, and Syria. According to the report, in 2007, North Korea attempted to ship to Syria, via China, material usable in ballistic missiles.⁸¹ The report indicates that this shipment was from Tangun to the SSRC.⁸² The report further states that while it could not confirm or deny reports of an ongoing missile cooperation between North Korea, Iran, and Syria, "this would be consistent with reports of the long history of missile cooperation [from North Korea to Iran and Syria] and with the Panel's observations."⁸³ A separate Panel of Experts report on Iran (see Iran section

above) further confirms this missile technology relationship.⁸⁴

Other Arms and Related Material

Previous North Korean behavior gives credence to suspicions about other ongoing transfers from North Korea to Syria. For example, according to the North Korea panel report, North Korea attempted to ship arms material to Syria in November 2010, prior to the start of the Syrian conflict. This shipment “contained brass discs and copper rods used to manufacture artillery munitions . . . and aluminum alloy tubes usable for making rockets.” The shipment never reached Syria, as France inspected and

seized the material, which was being transmitted in contravention of U.N. sanctions on North Korea.⁸⁵

Beyond the reported provision of missile parts and expertise, North Korea may also be providing Syria with other weapons, an extension of the long-standing illicit provisions from North Korea to Syria existing before the uprising. In September 2012, based on suspicions that it was carrying weapons, Iraq blocked a North Korean cargo plane from transiting through Iraqi airspace en route to Syria.⁸⁶ It is unclear whether other North Korean planes have successfully traveled through Iraqi airspace, or what other airspace they may have used to transport arms to Syria.

Venezuela

Diesel Fuel

Venezuela has sent diesel fuel to the Assad regime, providing a vital and lethal resource not sufficiently producible inside Syria. The shipments are from the state-owned PdVSA. Since November 2011, PdVSA has provided over 100,000 tons of diesel to Syria through four separate shipments on a single ship, the *Negra Hipolita*, traveling from Venezuela to the Baniyas port terminal in Syria.

In July 2012, the *Wall Street Journal* reported that PdVSA was processing its fourth major shipment of diesel to Syria since November 2011.⁸⁷ One documented shipment arrived in Syria on May 22, 2012, having been in Malta a week prior. Reuters reports that two similar shipments occurred in February 2012 and November 2011, all in the midst of the Syrian uprising and the Assad brutalities.⁸⁸ These shipments are worth hundreds of millions of dollars, substantially greater than trade between Venezuela and Syria before the conflict. This trade relationship offsets the impact of Western sanctions on Syria's ability to procure diesel for military purposes. The two most recent shipments were swaps of diesel for naphtha oil, helping

Syria preserve its foreign currency reserves and export its surplus domestically-produced naphtha. This allows the regime to use its financial reserves to procure other resources that may contribute to atrocities in Syria.⁸⁹

Though it cannot dock in the United States or Europe while carrying diesel to Syria due to sanctions, the *Negra Hipolita* receives protection and indemnity insurance coverage from the U.K. P&I club. PdVSA itself also has significant trade and commercial connections with the United States, including about 850,000 barrels a day of exports to the United States, as well as downstream refining processes through PdVSA's wholly owned subsidiary Citgo. Citgo's refining capacity in the United States provides important advantages to PdVSA due to its ability to optimally refine Venezuela's high-sulfur crude oil. These insurance, trade, and commercial relationships present opportunities for the U.S. government to disrupt Venezuelan fuel distribution to Syria, or through its embassy in Caracas, to leverage diplomatic pressure on Venezuelan authorities to end their lethal provisions of diesel to Syria.

Angola and South Africa

Diesel Fuel

Like Russia, Iran, and Venezuela, Angola is also providing the Assad regime with diesel fuel to operate its tanks and infantry vehicles. The *Wall Street Journal* reported in August 2012 that Sonangol, Angola's national oil company, had entered a contract to sell Sytrol 200,000 metric tons of diesel a month for 12 months, for \$855/ton.⁹⁰ The deal, which a South African firm named Avon Oil Trading Ltd. arranged for a \$1 million/month commission after Syria's ambassador to South Africa approached them, provides Syria with a significant amount of diesel, roughly half the volume it imported in 2009.

Angolan executives connected to the deal stated that they were aware of Western sanctions on Syria, but that they did not feel obligated to abide by them. South African officials stated that they remained neutral on sanctions on Syria. However, the United States can successfully engage both countries diplomatically to terminate the contract or to prevent other similar provisions to Syria.

The United States has strong trade relations with Angola. Oil exports account for nearly half of Angola's GDP, and the United States is the second largest recipient of Angolan oil. Sonangol also has a wholly owned subsidiary, Sonangol USA, based in Houston, TX, and has stakes in a number of U.S. Gulf of Mexico offshore oil and gas fields. These trade and commercial connections allow the U.S. government an opportunity to influence Angola to respect U.S. sanctions on Syria.

There is precedent demonstrating that such influence can be effective. In February 2012, Sonangol pulled out of a 20% stake in a \$7.5 billion natural-gas project in Iran due to the risk of antagonizing the United States, and because of U.S. sanctions on Iran.⁹¹ In January 2012, the State Department stated that it had discussed Iran sanctions with the Angolan government.⁹² At the same time, U.S. government officials also met with private entities in South Africa regarding Iranian sanctions.⁹³ Similar action can prevent Angolan diesel from fueling the Assad regime, and to prevent South African firms from undercutting effective U.S. sanctions on Syria by brokering oil trades to Syria.

Other Suppliers

A handful of other actors reportedly may be linked to the Syrian atrocities through material resource provisions to the Syrian regime. The suppliers include Belarus for possible arms transfers to Syria; Algeria for possibly sending diesel fuel; and actors in Cyprus (through an international network spanning Cyprus, the United Kingdom, Malaysia, Singapore, and India), Georgia, and Lebanon for attempting to send diesel to Syria.

In September 2012, the U.S. Treasury Department imposed sanctions on the Belarusian arms-exporting firm Belvneshpromservice (BVPS) for providing supplies to Syria's Army Supply Bureau. According to the Treasury Department designation, in March 2011 BVPS prepared to send fuses for the Syrian military's aerial bombs.⁹⁴ Aerial bombings have drastically increased civilian casualties, and the Assad regime has used aerial attacks to perpetrate crimes against humanity in Syria. BVPS has repeatedly been under U.S. sanctions for transfers of ballistic missiles or WMD material.⁹⁵ Further sanctions on the parties connected with the transport or brokering of Belarusian arms to Syria can more fully shut down Belarusian weapon provisions to Syria.

In July 2012, Aurora Finance Limited (Aurora), an oil firm with registered owners in Cyprus, incorporated in the United Kingdom, with agents in Malaysia and India, attempted to enter a contract with a Singaporean firm named Mar-Link Offshore Services (MLOS) to charter a vessel to send 200,000 tons of diesel from the Malaysian state oil firm Petronas to Syria. The deal fell through, according to MLOS, because the vessel was initially destined for Thailand and MLOS refused to deliver the diesel to Syria when asked by Aurora.⁹⁶

Private Lebanese entities are also responsible for smuggling smaller volumes of diesel into Syria. Reuters reported in June 2012 that private imports of diesel in April and May 2012 had nearly tripled from 2011, most likely being transported by private entities and possibly Hezbollah into Syria.⁹⁷ This support supplements Lebanon's purported role in allowing Iranian funds to reach Syria (see Iran section above). Similarly, Reuters reports that small vessels carrying diesel from Georgia have also sailed into Syria.⁹⁸ The United States provides foreign assistance to both Lebanon and Georgia. This assistance, and close bilateral relations, affords the United States an opportunity to exercise diplomatic and political action to have the Lebanese and Georgian governments investigate these reports and stop actors within those countries from fueling the crisis in Syria.

In May 2012, with new diesel provisions temporarily drying up, the Syrian Minister of Petroleum and Mineral Resources stated on Syrian TV that the oil ministry had engaged Algeria for fuel provisions, and that Algeria had "responded positively."⁹⁹ Algeria is itself a major importer of diesel, largely from Russia, and it is unclear through open source information whether Syria and Algeria completed a deal and what brokering, transportation, financing, or insuring parties were connected to any negotiations. If Algeria is reexporting diesel to Syria, these commercial parties are all pressure points where the United States can stop Algerian diesel provisions. Through diplomatic action, the United States can also work with the Algerian government to make sure Algeria is not enabling Assad.

American and European Dual-Use Technology Providers

Information technology providers in the United States and Europe have helped the Syrian regime develop methods to monitor Internet activity, censor websites, track Internet users, and potentially catalog and examine every email sent inside Syria. This technology bolsters the regime's brutal crackdown, as it allows the regime to trace users' IP addresses and track them to their homes and neighborhoods. It has been widely reported that this online tracing has led to a number of attacks on civilian neighborhoods and journalists, as well as targeted arrest, detention, and torture of protestors and activists.¹⁰⁰ Information technology providers have also provided enhanced communication equipment, likely installed in attack helicopters that the Assad regime has used to commit systematic and widespread attacks on civilians.

Internet surveillance and filtering technology is uniquely harmful when transferred to a repressive regime, as it can be used to identify and target civilian victims. Yet this technology remains highly uncontrolled as third parties and subsidiaries freely transfer the technology. Tighter export and deemed export licensing requirements from the U.S. Commerce Department and other countries can help prevent such technology from facilitating mass atrocities and other human rights violations. Stricter "know your customer" guidelines and greater disclosure of end-users and end-uses from each of the firms documented can also help to ensure that dual-use technology is not transferred to any parties who may use or transfer that equipment to repressive regimes. Increased accountability, including possible suspension from federal procurement and limitation of export privileges, can incentivize these firms to limit their provisions of lethal information and communication technology to Syria. Companies can also prevent such abuses through tracking the devices' automatic status message originations, building in "kill" switches, and preventing devices from access to system updates.

Blue Coat Systems Internet Filtering Devices

The Assad regime is using the California-based firm Blue Coat Systems Inc.'s Internet filtering devices, to monitor and track Internet usage and to censor websites.¹⁰¹ Internet blocking and tracking technology has allowed the regime to conduct targeted attacks on civilians, and stifled a civilian pro-democracy movement.

The Blue Coat Proxy SG devices ended up in Syria after a trader in the UAE purchased the devices through a Blue Coat authorized dealer in the UAE and shipped them to the Syrian government. According to the U.S. Commerce Department's Bureau of Industry and Security, in December 2010 the UAE company Infotec ordered multiple Blue Coat proxy devices from an authorized distributor.¹⁰² The designated end-user for the items was the Iraqi Ministry of Communication in Baghdad.¹⁰³ In February 2012, Blue Coat shipped the items to the United Arab Emirates and transferred the items to Infotec.¹⁰⁴ Three days later, the devices arrived in Syria, where the Syrian Telecommunications Establishment in Damascus started using them to censor the Internet in Syria.¹⁰⁵

Area SpA Internet Surveillance System

As the Syrian conflict started and escalated in early 2011, the Milan-based Italian company Area SpA was reportedly constructing a large Internet surveillance system inside Syria, worth over \$17.9 million, which would have allowed the Assad regime to intercept, search, and catalog every email sent inside the country.¹⁰⁶ It would also allow the regime to inspect and archive mobile phone and Internet service provider traffic. This technology would dramatically increase the Assad regime's ability to repress the population, and would empower the regime to more easily identify, track, and attack its opposition. After Bloomberg News published the study in November 2011, Area announced it was exiting the project, which it had suspended for three months, citing conditions inside Syria.¹⁰⁷

An Area employee told Bloomberg News that since the conflict started in March 2011, the firm had flown employees into Damascus to work on the project for Syria's state-owned fixed telephone line operator¹⁰⁸ and that they worked under Syrian intelligence agents that pushed Area to quickly install the system.¹⁰⁹ Before pulling out of the project, Area had set up equipment in a building in Damascus, with a data center and surveillance room, and put the technology in testing. In November 2011, Area maintained that the project complied with applicable export rules.

The project relied on technology from at least four other firms in the United States and Europe: (1) the California-based NetApp Inc.'s storage hardware and software, which archives email messages; (2) the Paris-based Qosmos SA's probe technology, which inspects emails and reconstructs all activity on an Internet user's screen; (3) the German firm Ultimaco Safeware AG, controlled by the U.K. firm Sophos Ltd., which provides gear to connect tapped lines to monitoring-center computers; and (4) California-based Hewlett Packard Co.'s (HP) equipment, which runs the technology.¹¹⁰

After members of Congress pressed the Commerce and State Department to investigate NetApp's involvement in the Area project, the Commerce Department's Bureau of Industry and Security, which is responsible for the transfer of dual-use technology, began investigating how NetApp's archiving technology ended up in Syria. Reports indicate that NetApp's Italian subsidiary sold the gear to an authorized vendor in Italy. That vendor then sold the technology to Area for \$3.5 million. From there, Area exported the technology to Syria. NetApp's senior director for corporate communications stated that the firm was not aware of NetApp products having been sold to Syria. Reports indicate however that NetApp's employees communicated directly with Area employees after the sale, discussing the configuration of NetApp equipment.¹¹¹

Paris-based Qosmos SA told Bloomberg News that the former was initially unaware of Area's use of their probe technology in Syria and that since October 2011, they had decided to exit the project, but technical and contractual obstacles made it difficult to exit.¹¹² Qosmos worked on the project through German-based Ultimaco Software AG.¹¹³ Ultimaco's General Manager told Bloomberg News that the firm was not aware of Area's involvement in Syria, and that the firm rarely knew where its equipment was installed because they did not require that disclosure and did not

sell their products directly to end-users.¹¹⁴ Later, Ultimaco stated that it required its partners to adhere to export regulations and sanctions, and that it halted activities with Area. U.K.-based Sophos Ltd., which controls Ultimaco, stated that it was working with Ultimaco to investigate the Area deal.¹¹⁵

HP technology, consisting mostly of servers and desktop computers worth over \$500,000, underpinned the nearly completed Area project.¹¹⁶ In response to a Securities and Exchange Commission's Office of Global Security Risk investigation, HP stated that it did not provide its technology directly to Syria but rather that its resellers or distributors likely distributed the products to Syria. According to a letter from HP's Associate General Counsel to the SEC, Area did not procure the technology directly from HP, but rather from an HP partner that was not informed of their ultimate destination. HP also stated that its contract with Area, terminated in April 2012, had prohibited Area from selling HP's products into countries facing U.S. export sanctions.¹¹⁷ It was not immediately clear what steps HP or its partner that resold its products had taken to determine their end-use, or what disclosure HP or its partners obtained from Area prior to the sale.

Finmeccanica's Communication Technology

The Selex Elsag unit of Finmeccanica SpA, a large multinational Italian defense company, reportedly delivered sophisticated mobile communication equipment to Syrian authorities in Damascus in May 2011. In February 2012, Selex also reportedly sent engineers to Damascus to train Syrian technicians on using the communications equipment in helicopter terminals.¹¹⁸ This support may have significantly strengthened the Assad regime's aerial forces, which have become central to the regime's commission of crimes against humanity.

The equipment, named Tetra, included 500 hand-held radios, and may have also included encryption technology to secure communications from vehicles and helicopters.¹¹⁹ It is not clear whether the Assad regime used the technology in military helicopters; however, the prevalent use of helicopters to perpetrate indiscriminate attacks against civilians, the direct delivery of items to police forces, and the Syrian government's increased orders for equipment after the start of the Syrian uprising all suggest that the equipment was likely put to military use.

The Tetra technology entered Syria through a sale from the Selex Elsag subsidiary of Finmeccanica to a Syrian unit of a Greek company called Intracom-Telecom. Intracom-Telecom's subsidiary, Intracom Syria, then delivered the technology to police in Damascus. Notably, both Finmeccanica and Intracom-Telecom have significant operations in the United States. Finmeccanica has a subsidiary named DRS Technologies in the United States, which has secured a number of Pentagon contracts.¹²⁰ According to Intracom-Telecom's website, the company has a subsidiary near Duluth, GA.

In response to reports on the sale, Finmeccanica issued a statement declaring that the deliveries complied with export rules, were completed prior to the start of the uprising, and that the technology was designed for civilian use. The statement, however, conceded that "[t]he possibility that the technology may have been used for other purposes is beyond SELEX Elsag's control." The statement did not acknowledge reports that the technology was delivered in May 2011, after the uprising. It also did not address why Selex engineers trained Intracom Syria engineers inside Damascus in 2012.

Conclusion

This study demonstrates the crucial support atrocity perpetrators need to perpetrate their crimes and the breadth of the networks that supply this support. An effective response to the crisis must comprehensively and systematically stop enablers from providing the resources, goods, services, and other support that fuel the atrocities. Because of the breadth of this atrocity supply chain, a number of pressure points exist where the United States can take action to shut down the flow of lethal resources to Syria.

The United States can capitalize on commercial relationships and other connections between the enabling parties and the United States to persuade those enablers to end their support for the Assad regime. The United States can also work with international partners that have

jurisdiction over enablers and connected commercial actors to shut down the enabling network. Through systematic enforcement of this approach, the United States can choke off the Assad regime's access to the resources that sustain its atrocities.

The United States should adopt this strategy beyond Syria. In other areas at risk for mass atrocities, the U.S. government should collect information about possible enabling supply chains that may fuel a crisis. It should use this information to engage in preventative diplomacy with the countries with jurisdiction over the supply chain to prevent an escalation of a conflict. It should create and implement strategies to systematically prevent enablers from fueling crimes against humanity

Recommendations

The Department of State

- The State Department should leverage political and diplomatic influence to publicly and privately persuade countries that are enabling the Syrian atrocities to end their enabling activities. Where countries are undermining the effectiveness of U.S. and other sanctions on the Syrian regime, either by providing resources to the regime or condoning enablers' activities within their borders, U.S. diplomatic staff should privately and publicly, at every relevant opportunity, pressure the local government to immediately cease its activities.
- The State Department should direct embassies to share the names of individuals and networks identified as enablers with foreign authorities who can aid in their interdiction. The supply chain fueling the atrocities in Syria operates across a number of jurisdictions, offering unique opportunities to stop the flow of diesel fuel, arms, troops, and other resources to the Syrian regime. Where local governments are cooperative, U.S. diplomats can work with local counterparts to disrupt the activities of enablers over which they have jurisdiction.
 - Foreign territories through which vessels or cargo planes transit can exercise territorial jurisdiction to stop and investigate known or suspicious shipments of arms, diesel, or other dangerous resources to Syria. Countries through whose jurisdiction these shipments commonly travel to Syria, such as Turkey via the Bosphorous Strait, Iraq through its airspace, or Egypt through the Suez Canal, are uniquely positioned to interdict enablers of Syrian atrocities.
 - Flag countries, and countries in which shell companies incorporate, have legal authority over the vessels registered or companies incorporated in their jurisdiction and can use this legal authority to prevent enabling resources from reaching the regime. Enablers commonly use foreign flags and shell companies incorporated in other jurisdictions to conceal their shipments.
 - Countries under whose jurisdiction commercial parties that comprise or facilitate enabling networks—including shipping companies, brokers, and insurance companies—operate, can exercise jurisdiction to prevent those actors from enabling atrocities in Syria. The State Department can diplomatically engage these countries to prevent these commercial entities from facilitating transfers of diesel, arms, and other lethal resources to Syria.
- The State Department should task embassies and diplomatic staff to collect information on individuals, commercial entities, or governments enabling atrocities in Syria. Given their direct access to information sources on the ground, embassy staff are optimally situated to gather information on the parties that comprise the Syrian atrocity supply chain.

The Department of Treasury

- The president should exercise his authority under the International Emergency Economic Powers Act (IEEPA) to direct the Treasury Department to impose sanctions that prevent U.S. entities from doing business with those that enable the Syrian conflict.
 - The president should direct the secretary of Treasury to prohibit U.S. banks from transacting with foreign financial institutions that provide financing to the Syrian regime to purchase weapons, diesel fuel, and other lethal resources. This would further isolate the Assad regime by discouraging foreign entities from providing the regime financial access, at the risk of being blacklisted from transactions with U.S. banks. Under IEEPA, the president may direct the Treasury to “investigate, regulate, or prohibit... transfers of credit or payments between, by,

through, or to any banking institution, to the extent that such transfers or payments involve any interest of any foreign country or a national thereof.”

- The secretary of Treasury, through the Office of Foreign Assets Control (OFAC), should exercise existing sanctions authority under current executive orders that impose sanctions on parties responsible for human rights abuses in Syria and designate for sanctions all entities that are found to have directly provided lethal material resources, or indirectly and knowingly assisted in the transmittal of lethal material resources, to the Assad regime. Prominent multinational entities such as ROE, PdVSA, Sonangol, Finmeccanica, and others that have provided Syria with arms, diesel, or equipment with military applications, should be prevented from access to the U.S. marketplace if they continue to enable Syrian atrocities. Smaller actors, including foreign shipping companies and shell companies that facilitate these transactions, should also be sanctioned and prevented from such access.
- The president should exercise his authority under IEEPA to direct the Treasury Department to impose sanctions that limit Syria’s ability to repatriate the funds it receives from its crude oil exports.
 - The department should impose sanctions designed to require foreign banks that purchase Syrian crude oil to keep the money used to pay for those deliveries in local bank accounts. These sanctions, similar to sanctions recently imposed on Iran under the Iran Threat Reduction and Syria Human Rights Acts of 2012, would force the regime to use those funds to buy goods only inside the country that purchases Syrian crude oil. By locking up Syrian oil revenue, Syria would lose the ability to repatriate funds to finance its atrocities. These measures also limit the impact of sanctions on civilians by allowing Syria to use its funds to procure food, heating oil, and other unsanctioned products for civilian use.

The Department of Defense

- The Defense Department (DOD) should void existing contracts with entities enabling atrocities in Syria, should suspend these parties from contractor and subcontractor eligibility, and should adopt a regulation to prohibit procurement from state-owned enterprises, commercial entities, and individuals that enable mass atrocities. In 2011, DOD entered into a \$1 billion no-bid contract with ROE to procure helicopters and spare parts for the U.S. mission in Afghanistan, and in June 2012, five U.S. defense firms approached ROE to subcontract for nonstandard weapons and ammunition for use in Afghanistan. Meanwhile, ROE has continued to supply arms to the Syrian regime. Similarly, DOD has entered into a large number of contracts with DRS Technologies, a subsidiary of Finmeccanica, while Finmeccanica has sent communications technology to Syria.
 - Under DOD implementation (32 C.F.R. 25) of the Federal Acquisition Regulations (48 C.F.R. 9.4), a suspending official may impose suspension where “immediate action is necessary to protect the public interest” (32 C.F.R. 25.7). This effectively will also restrict the contractor from subcontractor eligibility (48 C.F.R. 9.405-2). Given the ongoing commission of atrocities in Syria, the threat the crisis in Syria poses to core national security interests, and the role these firms play in enabling the atrocities, DOD should suspend ROE, Finmeccanica and its subsidiaries, and other enablers of Syrian atrocities from contractor and subcontractor eligibility, and halt fulfillment of existing contracts.

The Department of Commerce

- The Commerce Department, through its Bureau of Industry and Security (BIS) should amend the Export Administration Regulations (EAR) to close loopholes and more fully control the export, reexport, and transshipment of information and communications technology to repressive regimes like Syria. The EAR currently controls “devices primarily useful for the surreptitious interception of wire, oral, or electronic communication” (15 CFR 774). Despite this control, ambiguities in the definition of “primarily useful,” along with weak licensing requirements, allow information

and communication technology to flow to repressive regimes via third parties, with limited end-use disclosure, or in transactions not requiring export licenses.

- BIS should issue a rule that amends the EAR and more broadly defines “primarily useful” to clearly require licenses for the exports of technology with clear Internet filtering and surveillance uses, including Blue Coat proxy devices, NetApp storage hardware and software, and similar technology.
- BIS should not generally approve applications for licenses to export potentially repressive Internet technology, unless exporters first receive and provide BIS with significant disclosures detailing end-uses and end-users of technology. Prior to issuing a license, BIS should particularly require increased disclosures from an exporter when the shipment is bound for a large transshipment hub, such as the UAE, or where one of BIS’s published red flags indicators exist.¹²¹
- Where a U.S. entity is found to have violated the EAR by sending potentially repressive information and communication technology without an appropriate license, BIS should hold that entity accountable by seeking to deny that entity export privileges to the full extent allowable under the Arms Export Control Act and the Administrative Procedures Act.
- When a foreign entity, or a foreign subsidiary or partner of a U.S. company, imports potentially repressive information or communication technology, and reexports, transships, or transfers that technology to an unlicensed end-user, BIS should, through its Export Enforcement program, place that entity on the Denied Persons list and prevent them from receiving further U.S. exports.
- BIS should work with the manufacturers and exporters of information and communications technology to better inform the industry about best practices to prevent repressive regimes from procuring their technology. The Commerce Department faces a challenge to exercising effective export controls over this technology, given that it often

has many legitimate purposes. However, when transferred to repressive regimes like Syria, this technology can enable grave human rights abuses and undermine U.S. national security interests. BIS should proactively work with the manufacturers and exporters of this technology, by inviting them to consultations and promoting the awareness and adoption of best practices, to prevent their technology from enabling atrocities in Syria and elsewhere.

The Atrocity Prevention Board

- The Atrocity Prevention Board should actively and systematically identify and track enablers in early warning stages of atrocities and in response to ongoing atrocities even after they erupt. Drawing from the lessons of the role enablers have played in the Syrian conflict, the board should embed the tool of tracking and disrupting atrocity enablers in its menu of policy options. The board could employ these tools in any of the following stages: (a) identifying atrocity enablers—those supplying and facilitating the transfer of arms, equipment, diesel fuel, money, and other potentially lethal resources—at the early warning stages of an emerging crisis, (b) creating sanctions to target enablers, or strengthening existing sanctions regimes as a means of preventing atrocities, (c) more effectively enforcing existing sanctions programs to prevent enablers from circumventing them, (d) working with international partners with jurisdiction over enablers to halt the flow of resources and services that provide perpetrators the means to commit atrocities, (e) exercising all available leverage with corporate entities involved in the atrocity supply chain, and (f) bringing the issue of enablers to the attention of high-level policy makers.

Congress

- Congress should pass legislation that embeds strategies to disrupt enablers of Syrian atrocities. For instance:
 - Congress could pass legislation that tightens sanctions on the enablers of the Assad regime. Such legislation would mandate the secretary of the Treasury to issue regulations prohibiting foreign financial institutions that enable the atrocities in Syria from doing business with U.S. financial institutions.

- These regulations would prohibit U.S. financial institutions from opening or maintaining correspondent or payable-through accounts with foreign financial institutions where the secretary of the Treasury finds that the financial institution is enabling the atrocities in Syria by allowing the regime to pay for the procurement of lethal resources, or allowing the Syrian regime to receive funds for its exports.
- These regulations would further require U.S. financial institutions that do business with foreign financial entities that may be enabling atrocities in Syria to perform internal audits of the activities of those financial institutions, establish due diligence policies to prevent those institutions from doing business with the United States if they are found to facilitate atrocities in Syria, and certify to the Department of Treasury that the foreign financial institution is not helping the Assad regime finance its crimes.
- Congress could pass legislation requiring federal contractors to certify that they are not doing business with entities enabling atrocities in Syria. This legislation could amend the Federal Acquisition Regulations to require every executive agency to secure certification from all prospective contractors that neither the contractor, its subcontractors, or any foreign subsidiaries or affiliates engages in activity that enables atrocities in Syria. Such regulations would prohibit entities like ROE, Finmeccanica, and others from receiving U.S. contracts while engaged in activity that threatens the national security interests of the United States and enables the perpetration of atrocities in Syria.

Other Governments

- **Foreign governments should take steps to disrupt enablers that operate within their jurisdictions.** Governments under whose jurisdictions enablers operate, including the governments (1) under whose jurisdictions shell companies connected to the atrocity supply chain incorporate, (2) who provide flags to vessels carrying enabling resources, (3) through whose jurisdictions vessels carrying enabling resources transit, and (4) under whose jurisdiction commercial entities connected to the atrocity supply chain operate, should take steps to shut down the atrocity supply chain. By tightening domestic controls, requiring increased disclosures of possible enabling actors within their jurisdictions, and enforcing existing sanctions on Syria, these countries can prevent other governments, commercial entities, and individuals from exploiting their jurisdictions to enable atrocities in Syria.

Companies

- **Companies, including (1) dual-use technology manufacturers, brokers, exporters, and distributors, (2) international financial institutions, and (3) vessel owners, charterers, brokers, insurers, registration companies, and cargo owners, should comply with international norms governing business and human rights.** The U.N. Guiding Principles for Business and Human Rights and OECD Guidelines provide a framework for all business enterprises to respect international human rights. These commercial entities should, at a minimum, conduct responsible business by implementing due diligence standards, proactively enforcing those standards, exercising know your customer principles, and requiring enhanced disclosures from their partners where there is any risk of transfer or reexport to a repressive regime. These entities should not provide any services or goods where those services or goods facilitate mass atrocities in Syria or elsewhere.

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