Congress of the United States
Washington, DC 20515

June 16, 2016

Dennis Muilenburg
The Boeing Company
100 North Riverside
Chicago, Illinois 60606

Dear Mr. Muilenberg:

We write to seek clarification on the current status of the Boeing Company's negotiations to sell aircraft to the Islamic Republic of Iran. Recent reports indicate that a deal may have been reached and we understand you have publicly commented on the matter, yet have thus far not responded to multiple inquiries from Members of the United States Congress. On June 2, the U.S. State Department released its annual report, once again labeling Iran "the foremost state sponsor of terrorism" around the world. This report has been attached for your review. We strongly oppose the potential sale of militarily-fungible products to terrorism's central supplier. American companies should not be complicit in weaponizing the Iranian Regime.

Iran's commercial aviation sector is deeply involved in supporting hostile actors. The Islamic Revolutionary Guard Corps (IRGC) systematically uses commercial aircraft to transport troops, weapons, military-related parts, rockets, and missiles to hostile actors around the world, including, but not limited to, Hezbollah, Hamas, Islamic Jihad, the Houthi Rebels in Yemen, and the Bashar Al-Assad Regime in Syria. These terrorist groups and rogue regimes have American blood on their hands. Your potential customers do as well.

Iran Air, a Regime-owned entity identified by Boeing's Vice President for Middle East Sales Marty Bentrott as a prospective business partner, was recently designated by the U.S. Department of Treasury for providing logistical and financial support to the IRGC and Iran's Ministry of Defense and Armed Forces Logistics (MODAFL). Although Iran Air was quietly deleted from the Treasury Department's Specifically Designated Nationals List (SDN) in what was widely viewed as a diplomatic concession to Iran, there is no reason to believe the company has ceased its malicious activity.

In light of recent reports that a deal is imminent, we seek information to assist the U.S. Congress in determining the national security implications of a potential sale of Boeing aircraft to Iran. For this reason, we request answers to the following questions:

1. Have commercial airlines in Iran previously used Boeing aircraft to logistically or materially support Foreign Terrorist Organizations (FTOs), the IRGC, MODAFL, or the Assad Regime in Syria? Are commercial airlines in Iran currently using Boeing aircraft to logistically or materially support any FTOs, the IRGC, or the Assad Regime in Syria?

2. If Boeing decides to sell aircraft to Iranian Regime-owned entities, can you guarantee those entities will cease material, logistical, and financial support for FTOs, the IRGC, MODAFL, the Assad Regime in Syria, international terrorism, or other illicit activities?

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3. During the span of your negotiations with Iran, has the Boeing Company had contact with any individual who is currently or was previously designated on the SDN list? Has the Boeing Company had any contact with any individual who was part of Iran Air's executive leadership during the time it was designated by Treasury?

4. Can Boeing ensure planes or related parts sold to recently de-listed entities such as Iran Air will not be transferred to entities which are currently on the SDN list, such as Mahan Air?

5. The Boeing Company has been promoting a video on its website and social media accounts to advertise the ease of converting Boeing passenger jets to cargo aircraft. Can the Boeing Company guarantee the Iranian Regime will not convert Boeing passenger jets to cargo aircraft?

6. What action will the Boeing Company take if it determines that airplanes sold to Iran have been used for purposes other than exclusively civil aviation end-use, or have been re-sold or re-transferred to persons on the SDN List?

7. If the Boeing Company learns Iran is using Boeing aircraft in violation of the JCPOA, will it work to repossess or remotely disable the aircraft? What other options would the company have in such a scenario?

8. Does the Boeing Company seek to help Iranian airlines obtain financing for new aircraft sales? Boeing's Vice President for Middle East Sales Marty Bentrott told the press the company is "going to have to figure out a way collectively for them to be able to finance the assets," and there are "a number of different options that could be explored." Please elaborate on these options.

9. As you may know, the Treasury Department currently lists the Islamic Republic of Iran as a Jurisdiction of Primary Money Laundering Concern and, as such, bars transactions between the Iranian Rial and the U.S. Dollar. Will the Boeing Company use offshore dollar clearing facilities to obtain payment from Iranian entities? Will the Boeing Company accept payment through third parties to otherwise skirt Treasury regulations?

10. Will the Boeing Company attempt to involve the Export-Import Bank of the United States in any capacity?

We look forward to receiving and reviewing your detailed answers by **July 1, 2016**.

Sincerely,

PETER J. ROSKAM
Member of Congress

JEB HENSARLING
Member of Congress

Encl: United States Department of State. (2016). Chapter 3: State Sponsors of Terrorism. In *Country Reports on Terrorism 2015* (299-302). Washington D.C.

United States Department of State. (2016). *Country Reports on Terrorism* 2015. Washington D.C.