



ORDER OF AHEPA  
SUPREME LODGE HEADQUARTERS  
AMERICAN HELLENIC EDUCATIONAL PROGRESSIVE ASSOCIATION

July 29, 2020

The Honorable James Risch  
Chairman  
Senate Committee on Foreign Relations  
SD-423  
Washington, DC 20510

The Honorable Robert Menendez  
Ranking Member  
Senate Committee on Foreign Relations  
SD-423  
Washington, DC 20510

Dear Chairman Risch and Ranking Member Menendez:

On behalf of the membership of the American Hellenic Educational Progressive Association (Order of AHEPA), the leading service association for the nation's millions of Americans of Hellenic heritage and Philhellenes, I write on the occasion of the Senate Committee on Foreign Relations' hearing to examine the President's FY2021 proposed budget request for the U.S. Department of State with Secretary of State Mike Pompeo to convey AHEPA's request that key matters pertaining to United States engagement in the Eastern Mediterranean be addressed during the hearing as it relates to the aggressive and provocative behavior of NATO member Republic of Turkey.

Turkey continues to demonstrate it is an unreliable and dubious NATO ally. Turkey's \$2.5 billion acquisition of four divisions of S-400 missiles from Russia has raised concern among NATO members because the missiles are not interoperable with NATO and could be honed against F-16s and F-35s, which are both used by U.S. allies in the region. It's been one year since Turkey's defense ministry said the first parts of the Russian-manufactured S-400 missile defense system were delivered to Ankara.<sup>1</sup> It has been eight months since press accounts reported Turkey tested the S-400 missile defense system against F-16 aircraft.<sup>2</sup> In April, Turkey planned to activate the S-400s only to be delayed by COVID-19.<sup>3</sup>

Perhaps the Administration's position is to hold out hope that Turkey's blatant violation of United States law, and its threat to United States security, can be resolved diplomatically. However, it is clear Turkish President Recep Tayyip Erdogan is apathetic to the United States' security concerns and stands in defiance of U.S. law. We also respectfully disagree with a senior State Department official's November 2019 statement that "there's not an absolute trigger" on when CAATSA has to occur; even if the official is correct, we contend November 2019's S-400 missile system test and Turkey's planned April activation of the system justify a change in that position.

Since the initial delivery of S-400 parts one year ago:

- Turkey has conducted a military incursion into Syria that prompted the House of Representatives to pass overwhelmingly (by a 403 to 16 vote) bipartisan legislation to sanction Turkey and your Committee's rightful action to pass a companion bill, S.2641, under your leadership;
- Turkey has engaged with Libya, signing a maritime boundary Memorandum of Understanding (MoU) that has been dismissed as null and void and devoid of any legal standing by the international community; and by doing so, Turkey has violated the UN Security Council's arms embargo on Libya that prompted the EU to send a naval mission<sup>4</sup> to the area to enforce the blockade;

<sup>1</sup> <https://www.reuters.com/article/us-turkey-security-usa-timeline/timeline-turkeys-path-to-buying-russian-air-defense-systems-and-possible-u-s-sanctions-idUSKCN1UH1RB>

<sup>2</sup> <https://www.businessinsider.com/turkey-tests-f-16s-with-russian-air-defense-system-s400-2019-11>

<sup>3</sup> <https://www.reuters.com/article/us-health-coronavirus-turkey-usa/coronavirus-puts-missile-showdown-between-turkey-and-u-s-on-hold-idUSKBN22224M>

<sup>4</sup> <https://www.bloomberg.com/news/articles/2020-03-26/eu-diplomats-reach-deal-on-naval-mission-to-patrol-libya-embargo>



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- Turkey deliberately instigated a migrant crisis on its land and sea border with Greece<sup>5</sup> and moreover, Turkey has escalated its violations of Greece’s airspace and territorial waters to unprecedented levels<sup>6</sup>, including issuing an illegal NAVTEX last week that encroached upon Greece’s continental shelf and exclusive economic zone (EEZ) – actions that unnecessarily risk lives and elevate tensions to dangerous levels between two NATO member countries, which is not in the best interests of the United States;
- Turkey has violated repeatedly the EEZ of the Republic of Cyprus and its last incursion prompted a response from U.S. ambassador to Cyprus Judith Garber, who urged Turkish authorities to “halt these operations<sup>7</sup>,” and in another instance, Turkey engaged with an Israeli research ship and deported it out of Cypriot waters<sup>8</sup>; and
- President Recep Tayyip Erdogan took formal action to change the status of Hagia Sophia, a UNESCO World Heritage Site, from a museum to a mosque.

We continue to be alarmed by Turkey’s provocative and aggressive behavior that shuns American values, challenges American security interests, and threatens NATO allies and strategic partners of the United States in the Eastern Mediterranean and Middle East. Moreover, we contend Turkey’s acquisition of the S-400s emboldens Russia’s malign activities that are aimed to drive a wedge into NATO.

President Donald Trump delegated authority to Secretary of State Mike Pompeo, by Executive Order 13849<sup>9</sup> on September 20, 2018, to work in consultation with Treasury Secretary Steven Mnuchin, to impose sanctions on entities pursuant to Section 231 of CAATSA. This executive order resulted in the rightful sanctioning of Chinese entities and individuals that engaged with the CAATSA section 231 List of Specified Persons (LSP) that led to the “transfer to China of Su-35 combat aircraft and S-400 surface-to-air missile system-related equipment.”<sup>10</sup> The Russian state-owned defense company, Almaz-Antey, which manufactures the S-400 missile defense system, appears on the CAATSA section 231 LSP.<sup>11</sup> To date, no action under CAATSA has been taken by the United States to hold Turkey accountable for its acquisition of the S-400s.

As a result, Turkey is emboldened in its behavior. It has embarked on a series of belligerent and reckless acts in violation of international law. The United States’ inaction runs counter to its own stated policy goal to “impose costs on the Russian Government for its malign activities.”<sup>12</sup> The Russian government stands to profit in the billions from an arms export to a NATO member while it continues to pursue its malign activities.

The United States must not pursue a policy of appeasement. Instead, the United States must send a strong message to Turkey, as well as Russia again, and impose sanctions on Turkish entities and individuals under CAATSA for its acquisition of the S-400s, just as the current Administration justly did with Chinese entities in 2018.

<sup>5</sup> <https://www.bild.de/politik/ausland/politik-ausland/fluechtlingskrise-medienbericht-tuerkei-steuerte-ansturm-auf-griechische-grenze-69663368.bild.html>

<sup>6</sup> <https://www.ekathimerini.com/251748/article/ekathimerini/news/turkish-jets-smash-overflights-record-this-year>

<sup>7</sup> <https://cy.usembassy.gov/these-activities-must-stop/>

<sup>8</sup> <https://www.ipost.com/Israel-News/Turkish-Navy-engages-with-Israeli-research-ship-deporting-it-out-of-Cyprus-610923>

<sup>9</sup> Executive Order 13849, [https://www.treasury.gov/resource-center/sanctions/Programs/Documents/caatsa\\_eo.pdf](https://www.treasury.gov/resource-center/sanctions/Programs/Documents/caatsa_eo.pdf)

<sup>10</sup> <https://www.state.gov/caatsa-section-231-addition-of-33-entities-and-individuals-to-the-list-of-specified-persons-and-imposition-of-sanctions-on-the-equipment-development-department/>

<sup>11</sup> <https://www.state.gov/caatsa-section-231d-defense-and-intelligence-sectors-of-the-government-of-the-russian-federation/>

<sup>12</sup> <https://www.state.gov/caatsa-section-231-addition-of-33-entities-and-individuals-to-the-list-of-specified-persons-and-imposition-of-sanctions-on-the-equipment-development-department/>



### Questions for the Record

**On S.2641, Promoting American National Security and Preventing the Resurgence of ISIS Act of 2019 and holding Turkey accountable under CAATSA.** The Senate Foreign Relations Committee passed S.2641, which was a direct congressional response to Turkey’s military incursion into northeast Syria and attack on the Kurds, as well as their purchase of the Russian S-400 defense system, with bipartisan support. Among the bill’s provisions include the imposition of sanctions on Turkey under CAATSA as well as for Turkey’s malign activities in Syria.

- *Why has the Administration refrained from imposing sanctions on Turkish entities for violation of CAATSA through its acquisition of the Russian-made S-400 missile defense system, especially as the Administration did impose sanctions on Chinese entities in 2018 for a similar acquisition? And what is the Administration’s position on S.2641?*

**On Turkey’s illegal NAVTEX and Overall Turkish Aggression.** The State Department’s urging Turkish authorities to halt its operations off the coast of Kastellorizo is welcomed. However, any reference by the United States to Greece’s continental shelf as “disputed waters” is simply unacceptable, erroneous, and only serves to embolden Turkey. *Further, in a July 25 tweet, Secretary Pompeo wrote: “The United States’ policy is crystal clear: The South China Sea is not China’s maritime empire. If Beijing violates international law and free nations do nothing, history shows the CCP will simply take more territory. China Sea disputes must be resolved through international law”<sup>13</sup>.*

- *Why does the United States refrain from using similar strong language and tone in message when it comes to Turkey’s brazen aggression in the Eastern Mediterranean that violates international law just the same? How does the Administration plan to hold Turkey accountable for its illegal activities directed toward NATO allies and U.S. strategic partners in the Aegean, Eastern Mediterranean, and Middle East?*

**On Hagia Sophia.**

- *Why has the Administration not sent a stronger message of condemnation to Turkish President Recep Tayyip Erdogan on his action to change the status of Hagia Sophia from a museum to a mosque?*

Sincerely,

George G. Horiates, Esq.  
National President

Founded in 1922 in Atlanta, Georgia, on the principles that undergirded its fight for civil rights and against discrimination, bigotry, and hatred felt at the hands of the Ku Klux Klan, AHEPA is the largest and oldest grassroots association of American citizens of Greek heritage and Philhellenes with more than 400 active chapters across the United States, Canada, and Europe. AHEPA’s mission is to promote the ancient Greek ideals of Education, Philanthropy, Civic Responsibility, and Family and Individual Excellence through community service and volunteerism.

<sup>13</sup> <https://twitter.com/SecPompeo/status/1287048779452030978>