Biden, Congress Should Defend Terrorism Sanctions Imposed on Iran

By Richard Goldberg, Saeed Ghasseminejad, Behnam Ben Taleblu, Matthew Zweig, and Mark Dubowitz

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During a Senate Foreign Relations Committee hearing to consider Antony Blinken’s nomination for secretary of state, Blinken was asked whether he believed it is in America’s national security interest to lift terrorism sanctions currently imposed on Iran, including sanctions targeting Iran’s central bank, national oil company, financial sector, and energy sector. “I do not,” Blinken responded. “And I think there is nothing, as I see it, inconsistent with making sure that we are doing everything possible – including the toughest possible sanctions, to deal with Iranian support for terrorism.”1

Bipartisan support for terrorism sanctions targeting Iran goes back to 1984, when the United States first designated the Islamic Republic as a State Sponsor of Terrorism. Since then, every U.S. president2 – Republican or Democrat – and Congress have taken steps to reaffirm U.S. policy opposing Iran’s sponsorship of terrorism and tying sanctions relief to Iran’s cessation of terror-related activities.

President Joe Biden has pledged to rejoin the 2015 Iran nuclear deal, formally known as the Joint Comprehensive Plan of Action (JCPOA), if Iran returns to “strict compliance” with the agreement.3 Terrorism sanctions on Iran, however, should not be lifted, even if the Biden administration opts to return to the deal, unless and until Iran verifiably halts its sponsorship of terrorism.

This memorandum provides an overview of Iran’s past and ongoing involvement in terrorism-related activities, a review of longstanding bipartisan congressional support for terrorism sanctions on Iran, and a list of terrorism sanctions currently imposed on Iran that should not be lifted.

Iran’s Sponsorship of Terrorism

In its latest annual country report on terrorism, the Department of State reaffirmed Iran’s wide range of terror-related activities. Hezbollah, a designated foreign terrorist organization since 1997, remains Iran’s “primary terrorist

proxy group.” The Islamic Republic also provides support to a number of Palestinian terrorist groups, including Hamas, Palestine Islamic Jihad, and the Popular Front for the Liberation of Palestine-General Command.⁴

According to State, Iran uses the Islamic Revolutionary Guard Corps-Quds Force (IRGC-QF) “to provide support to terrorist organizations, provide cover for associated covert operations, and create instability in the region.” The IRGC-QF moves weapons to Hezbollah through Iraq and Syria⁵ while providing arms and training for Yemen-based terrorist attacks by the Houthis. Iran has also plotted attacks against dissidents on European soil, including in Denmark, France, the Netherlands, Belgium, and Albania.⁶

Over the years, Iran has sponsored several high-profile terrorist attacks targeting Americans and Jews, including the bombing of the U.S. Embassy and Marine barracks in Beirut (1983), the Jewish community center of Buenos Aires (1994), and the Khobar Towers in Saudi Arabia (1996). Iran’s chief proxy, Lebanese Hezbollah, was behind a 2012 bus bombing that killed five Israeli civilians and one Bulgarian in Burgas, Bulgaria.⁷ According to the U.S. Department of Defense, the IRGC is responsible for the murders of at least 603 U.S. troops in Iraq.⁸

The State Department also reports that “Iran has allowed [al-Qaeda] facilitators to operate a core facilitation pipeline through Iran since at least 2009, enabling [al-Qaeda] to move funds and fighters to South Asia and Syria.”⁹ The department recently announced a reward for information that brings to justice Iran-based al-Qaeda leader Muhammad Abbatay.¹⁰

**Congressional Support for Terrorism Sanctions on Iran**

Just weeks after an Iran-sponsored terrorist attack on a U.S. military complex in Saudi Arabia in 1996, President Bill Clinton signed the Iran Libya Sanctions Act (ILSA) into law.¹¹ In 2010, President Barack Obama signed the Comprehensive Iran Sanctions, Accountability, and Divestment Act (CISADA) into law.¹² Both ILSA and CISADA specifically tied their termination criteria to Iran’s cessation of terrorism sponsorship – and both received overwhelming bipartisan support in both chambers of Congress.

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In 2015, following the Obama administration’s negotiation of the JCPOA, the House and Senate passed the Hizballah International Financing Prevention Act without opposition. Though the bill mandated sanctions on the financial and logistics networks of Iran’s largest terrorist proxy, Obama signed it into law.\textsuperscript{13}

In 2017, the House passed the Countering America’s Adversaries Through Sanctions Act by a vote of 419-3.\textsuperscript{14} No House Democrat voted against the legislation, which mandated sanctions on entities connected to the IRGC and compelled the Trump administration to designate the IRGC as a terrorist entity.\textsuperscript{15} The legislation cleared the Senate by a vote of 98-2.\textsuperscript{16} An earlier Senate version, the Countering Iran’s Destabilizing Activities Act of 2017, chiefly co-sponsored by Senator Robert Menendez (D-NJ), passed by the same margin.\textsuperscript{17} Notably, these votes took place while the United States remained a participant in the JCPOA.

In 2018, despite disagreements in Congress over the Trump administration’s decision to cease America’s participation in the JCPOA, the House and Senate passed the Hizballah International Financing Prevention Amendments Act by unanimous consent – further ensnaring Iran’s terror-finance channels to Hezbollah in a web of mandatory U.S. sanctions.\textsuperscript{18}

\textbf{Why Terrorism Sanctions on Iran Matter Today}

Understanding the historical role Congress played in enacting and overseeing the implementation of terrorism sanctions on Iran and its proxies is increasingly important today as Biden pledges to rejoin the JCPOA if Iran returns to its commitments under the agreement – a pledge made notwithstanding the fact that the deal has already begun to expire and that Iran is under investigation for concealing undeclared nuclear activities.\textsuperscript{19}

Congress should send a bipartisan message to the Biden administration that regardless of where members may stand on the JCPOA, the overwhelming majority agrees that no terrorism-sanctions relief should be provided to Iran. Such a policy stance would be in line with Blinken’s testimony before the Senate Foreign Relations Committee and a previous commitment he made during the 2020 campaign: “[W]e will continue non-nuclear sanctions as a strong


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hedge against Iranian misbehavior in other areas.”20 Indeed, the Obama White House itself pledged that under the JCPOA, “non-nuclear sanctions (such as for terrorism) must remain in effect and be vigorously enforced.”21

During the debate over the JCPOA in 2015, the Obama administration referred to the sanctions relief provided to Iran under the agreement as “nuclear sanctions” – using the ambiguity of congressionally enacted sanctions to deliver broad sanctions relief to Iran. In 2021, however, this sleight of hand is no longer possible. While the Treasury and State departments have designated entities connected to Iran's nuclear program under Executive Order 13382 (relating to weapons of mass destruction), they have also specifically designated key sectors, entities, and individuals in Iran based on non-nuclear conduct22 – whether for involvement in missiles, human rights violations, or terrorism – including designations made pursuant to Executive Order 13224 (relating to terrorism).

This memorandum includes specific details and lists of sectors, entities, and individuals currently subject to U.S. sanctions because of their connection to Iran's sponsorship of terrorism and/or the IRGC. Any sanctions relief provided to Iran that benefits these sectors or entities would constitute terrorism-sanctions relief and would not be in America's national security interest.

Sectors of Iran's Economy Connected to the IRGC and/or Terrorism

Several sectors of Iran's economy are permeated by the IRGC and/or help finance Iran's sponsorship of terrorism. Any sanctions relief provided to these sectors – including the rescission of executive orders, the removal of sector designations, or the issuance of national security waivers pursuant to various Iran sanctions laws – would provide direct budgetary assistance to the IRGC and/or to Iran's sponsorship of terrorism.

- Financial Sector: In late 2019, the Financial Crimes Enforcement Network issued a final rule under Section 311 of the PATRIOT ACT declaring Iran's financial sector to be a primary jurisdiction of money laundering concern – particularly for terror finance.23 A draft rule issued during the Obama administration also referenced terrorism and Iran's support for Hezbollah.24 The Central Bank of Iran and many other Iranian banks are

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sanctioned due to their support for terrorism. The international Financial Action Task Force has also imposed countermeasures on Iran’s financial sector for its involvement in financing terrorism. Iran’s financial sector is subject to sanctions pursuant to Executive Order 13902 as of October 8, 2020.

**Energy Sector:** Iran’s energy sector has been the target of U.S. sanctions since the 1990s. The IRGC owns and controls companies in the energy sector. The National Iranian Oil Company, the National Iranian Tanker Company, Iran’s Ministry of Petroleum, and the National Petrochemical Company are sanctioned under terrorism authorities. The IRGC’s Khatam-al-Anbia Construction Headquarters (KAA), the largest construction firm in the country, is deeply involved in energy sector projects. Sanctions targeting Iran’s energy sector include the Iran Sanctions Act, Section 1245 of the National Defense Authorization Act for Fiscal Year 2012, the Iran Threat Reduction and Syria Human Rights Act, the Iran Freedom and Counterproliferation Act, and Executive Order 13846.

**Construction Sector:** The IRGC is deeply involved in the construction sector. The IRGC’s KAA is the sector’s largest contractor and has engaged in a diverse array of construction activities abroad. In addition, the IRGC owns other firms in the sector and considerable real estate assets. Iran’s construction sector is subject to sanctions pursuant to Executive Order 13902.

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• **Mining, Mineral, and Industrial Metals Sectors:** The IRGC has a significant presence in the mining and industrial metals sectors. The IRGC owns firms that are active in mining and processing metals. Several IRGC-owned mining and metal processing companies are currently subject to sanctions. Iran's metals and mining sectors are subject to sanctions pursuant to Executive Order 13871 and Executive Order 13902.

• **Automotive Sector:** The IRGC continues to be involved in the automotive sector through cooperation with carmakers in developing technology and producing parts. In December 2019, Iran's Ministry of Defense and Armed Forces Logistics (MODAFL), which is under U.S. sanctions for its support for terrorist groups, signed a deal with SAIPA (an Iranian automaker) to support the production of automobile parts. SAIPA's CEO reportedly said, "With [the] Defense Ministry's help, domestic substitutes for 35 key auto parts are to be produced in Iran to curb the industry's reliance on the global supply chain." Iran Khodro (another Iranian automaker, branded as IKCO) also inked agreements with eight MODAFL-linked entities that same month. In November 2020, SAIPA announced it was implementing projects in collaboration with sanctioned entities, including MODAFL and the IRGC Aerospace Force (which oversees Iran's ballistic missile arsenal).

• **Petrochemical Sector**: The IRGC and the Iranian military are significant players in the petrochemical sector.48 Military insurance and social security funds own large petrochemical companies,49 and the IRGC’s KAA is active in building petrochemical plants. In June 2019, Treasury designated Iran’s Persian Gulf Petrochemical Industries Company for providing financial support to KAA.50 Iran’s petrochemical sector is subject to sanctions pursuant to Executive Order 13846.51

**Entities in Iran Connected to the IRGC and/or Terrorism**

As of January 19, 2021, more than 300 Iran-connected companies, institutions, and individuals were sanctioned explicitly for their support for terrorism and/or for being owned and/or controlled by the IRGC.52 Sanctions relief of any form that provides benefits to these entities and individuals – including removal from the Specially Designated Nationals and Blocked Persons List, granting general licenses, or issuing national security waivers pursuant to various Iran sanctions laws – would provide direct budgetary assistance to the IRGC and to Iran’s sponsorship of terrorism, unrelated to the JCPOA. The following is a list of 320 Iran-connected individuals and entities designated by the Treasury Department for their support for terrorism and/or connection to the IRGC as of January 19, 2021.

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AL-KHALIDI, Faisal Jassim Mohammed al-Amri
ALLAHDAD, Hushang
AL-MUSTAFA INTERNATIONAL UNIVERSITY
AL-NAKHALAH, Ziyad
AL-QA’IDA KURDISTAN BATTALIONS
AL-SHAKHAN, Fuad Ahmad Nuri Ali
AL-ZAHRANI, Ahmed Abdullah Saleh al-Khazmari
AL-ZAYDI, Shibl Muhsin ‘Ubayd
AMINI, Meghdad
ANDISHEH MEHVARAN INVESTMENT COMPANY
ANSAR BANK
ANSAR BANK BROKERAGE COMPANY
ANSAR EXCHANGE
ANSAR INFORMATION TECHNOLOGY COMPANY
ARAGHI, Abdollah
ARBABSIAR, Manssor
ARIAN BANK
ASADI, Ali Farhan
ATABAKI, Alireza
ATIEH SAZAN DAY
ATLAS EXCHANGE
AZARPIŞEH, Mehdi

B
BADIN, Yadollah
BAHJAT AL KAWTHAR COMPANY FOR CONSTRUCTION AND TRADING LTD.
BAHMAN GROUP
BAKHTIARI, Marshallah
BANCO INTERNACIONAL DE DESARROLLO
BANDAR ABBAS ZINC PRODUCTION COMPANY
BANK KARGOŞAAEE
BANK MARKAZI JOMHOURI ISLAMI IRAN
BANK MELLAT
BANK MELLI IRAN
BANK SADERAT IRAN
BANK SADERAT PLC
BANK TEJARAT
BAQİYATTİLLAH UNIVERSITY OF MEDICAL SCIENCES
BASIJ RESISTANCE FORCE
BAYUMI, Yisra Muhammad Ibrahim
BEHINEH TRADING
BEHNAM SHAHRIYARI TRADING COMPANY
BEHSHAHR INDUSTRIAL DEVELOPMENT CORP.
BLUE AIRWAYS
BMIIC INTERNATIONAL GENERAL TRADING
BONYAD TAAVON BASIJ
BONYAD TAAVON SEPAH
BUALI INVESTMENT COMPANY
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CALCIMIN
CASPlian AIRLINES
CEMENT INDUSTRY INVESTMENT AND DEVELOPMENT COMPANY

D
DAMAVAND POWER GENERATION COMPANY
DAY BANK
DAY BANK BROKERAGE COMPANY
DAY E-COMMERCE
DAY EXCHANGE COMPANY
DAY IRANIAN FINANCIAL AND ACCOUNTING SERVICES COMPANY
DAY LEASING COMPANY
DEEP OFFSHORE TECHNOLOGY COMPANY, P.J.S.
DENa AIRWAYS
DIANAT, Amir

E
EBRAHIMI, Ayatollah
EBRAHIMI, Hasan Dehghan
EDBI EXCHANGE BROKERAGE
EDBI STOCK BROKERAGE
EP-LDA (Aircraft)
EP-LDC (Aircraft)
EP-PUA (Aircraft)
EP-PUL (Aircraft)
EP-PUM (Aircraft)
ESFAHAN’S MOBARAKEH STEEL COMPANY
ETEMAD TEJARATE PARs CO.
EXPORT DEVELOPMENT BANK OF IRAN

F
FADAKAR, Alireza
FARHAT, Muhammad ‘Abd-al-Amir
FATEMIYOUN DIVISION
FATER ENGINEERING INSTITUTE
FATTAH, Parviz
FIRST EAST EXPORT BANK
FORENT TECHNIK GMBH
FORUZANDEH, Ahmed
FREE LIFE PARTY OF KURDISTAN
FUTURE BANK B.S.C.

G
GHANI, Esmail
GHARARGAHE SAZANDEGI GHAEM
GHASEMZADEH, Mehdi
GHASHGHAVI, Hamed
GHOLAMSHAHI, Abbas
GHOLIZADEH, Vali
GHORB KARBALA
GHORB NOOH
GHUMAYN, Abu Bakr Muhammad Muhammad
GLOBAL VISION GROUP
HAJI BASIR AND ZARJAMIL
COMPANY HAWALA

HAJI KHAIRULLAH HAJI SATTAR
MONEY EXCHANGE

HAJIZADEH, Amir Ali

HAMRAHAN PISHRO TEJARAT
TRADING COMPANY

HARA COMPANY

HASAN YUSUF, Ahmad

HEIDARI, Reza

HEJAZI, Mohammad

HEKMATYAR, Gulbuddin

HEMMATI, Alireza

HITAL EXCHANGE

IMAM HOSSEIN UNIVERSITY

IMAM KHOMEINI SHAZAND OIL
REFINING COMPANY

IMENSAZEN CONSULTANT
ENGINEERS INSTITUTE

IRAN MARINE INDUSTRIAL
COMPANY, SADRA

IRAN TRACTOR
MANUFACTURING COMPANY

IRAN ZINC MINES
DEVELOPMENT COMPANY

IRANIAN ATLAS COMPANY

IRANIAN MINISTRY OF INTELLIGENCE
AND SECURITY

IRANIAN OIL PIPELINES AND
TELECOMMUNICATION CO.

IRAN-VENEZUELA BI-NATIONAL BANK

IRGC GROUND FORCES

IRGC NAVY

IRLU, Hasan

ISLAMIC REVOLUTIONARY GUARD CORPS

ISLAMIC REVOLUTIONARY GUARD CORPS
(IRGC)-QODS FORCE

ISLAMIC REVOLUTIONARY GUARD CORPS
AEROSPACE FORCE SELF SUFFICIENCY
JIHAD ORGANIZATION

ISLAMIC REVOLUTIONARY GUARD
CORPS AIR FORCE

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AL-GHADIR MISSILE COMMAND

ISLAMIC REVOLUTIONARY GUARD CORPS
ELECTRONIC WARFARE AND CYBER
DEFENSE ORGANIZATION

ISLAMIC REVOLUTIONARY GUARD CORPS
RESEARCH AND SELF-SUFFICIENCY JEHAD
ORGANIZATION

IZADI, Muhammad Sa'id

JA'FARI, Mohammad Agha

JABARIN, Zaher

JAFARI, Mohammad Ali

JAHAN ARAS KISH

JALAL MAAB, Mohammad

JAYSH AL-ADL

JOINT PARTNERSHIP OF MOHAMMADREZA
KHEDMATI AND ASSOCIATES
K
KAREEM, Aras Habib
KAZEMBAD, Mahmud Bagheri
KHATAM OL ANBIA GHARARGAH SAZANDEGI NOOH
KHEDRI JAHAN DARYA CO
KHEDRI, Abdolhossein
KHODAI, Mohammad Hasan
KISH P AND I CLUB

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LINER TRANSPORT KISH

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MADA’IN NOVIN TRADERS
MADANIPOUR, Mahmoud
MAHAN AIR
MAHER TRADING AND CONSTRUCTION COMPANY
MAKIN INSTITUTE
MARTYRS FOUNDATION
MASJEDI, Iraj
MEHR BANK
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MEHR-E EQTESAD-E IRANIAN INVESTMENT COMPANY
MELLAT BANK CLOSED JOINT-STOCK COMPANY
MELLI BANK PLC
MELLI INTERNATIONAL BUILDING & INDUSTRY COMPANY
MERAJ AIR
MIDDLE EAST SAMAN CHEMICAL COMPANY
MINA’I, Mohammad
MINISTRY OF DEFENSE AND ARMED FORCES LOGISTICS
MINISTRY OF PETROLEUM
MIR BUSINESS BANK
MIRAGE FOR ENGINEERING AND TRADING
MIRAGE FOR WASTE MANAGEMENT AND ENVIRONMENTAL SERVICES SARL
MOHAMMADI, Behzad
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MUSAVIFAR, Sayyed Reza
MUSAVIR, Sayyed Yaser

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