

House Foreign Affairs Committee

Subcommittee on the Middle East, North Africa, and Central Asia

Iran's Escalating Threats:

Assessing U.S. Policy Toward Iran's Malign Activities

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Introduction:

Chairman Wilson, Ranking Member Phillips, distinguished members of the Subcommittee on The Middle East, North Africa, and Central Asia at the House Committee on Foreign Affairs, on behalf of the Foundation for Defense of Democracies (FDD) think tank, thank you for inviting me to testify. It is an honor to present my analysis alongside Norman Roule, Masih Alinejad, and Suzanne Maloney, all distinguished individuals who have greatly informed our national conversation on Iran policy.

My testimony today offers a précis of the state of play between the United States and Iran to include an evaluation of current policies, an assessment of evolving Iranian threats in several domains, and recommendations to better counter these challenges.

State of Play:

A hearing on the Iran policy challenge could not be timelier. This month marks the one-year anniversary of nationwide protests against the Islamic Republic, protests that were touched off with the beating and killing by Iran's morality police of a 22-year-old Iranian-Kurdish woman named Mahsa Amini. Since her killing, Iran has experienced the largest protests in its history since the 1979 Islamic Revolution, touching all 30 provinces and over 150 cities, towns, and villages at its height. These protests do not merely seek changes to Iran's discriminatory dress codes for women. They seek a wholesale political change away from the current Islamist and authoritarian structure of power. More demonstrations are expected as the anniversary approaches, with the regime already cracking down on rights defenders.ⁱ

This coming October marks the expiration of UN prohibitions on Iranian ballistic missile activities as well as European sanctions against Iran's nuclear, missile, and military brain trust.ⁱⁱ While the EU and UK are reportedly expected to defend most of their sovereign nonproliferation sanctions on Iran,ⁱⁱⁱ UN penalties are expected to "sunset," thereby rendering Tehran politically unconstrained when it comes to ballistic missile testing and transfers.

To date, the Biden administration's Iran policy has largely focused on nuclear diplomacy with Tehran for what was initially a better, then identical, and now significantly more circumscribed accord than the 2015 deal known as the Joint Comprehensive Plan of Action (JCPOA). Recent hostage diplomacy with Iran may be paving the way for what is fast emerging as a lesser and unwritten nuclear understanding that locks in — rather than rolls back — Iranian enrichment.^{iv} In addition to likely being an attempt to avoid congressional oversight, which itself warrants further investigation from Congress, an unwritten agreement or set of agreements could also be the result of Tehran's persistent dangling of nuclear diplomacy^v to an administration hesitant to embrace a pressure-based Plan B.

In pursuit of a diplomatic settlement, American restraint has not led to meaningful restraint by Iran. Moreover, when married with Washington's palpable desire for de-escalation in the Middle East, sporadic shows of force by the United States, to include selective enforcement of oil sanctions since May 2022, have not been sufficient to get Tehran to reconsider its present course. And why should it?

Iran's reported oil exports for August 2023 alone ranged from 1.4 to just over 2 million barrels per day,^{vi} with both figures representing a historic high since the reimposition of sanctions in 2018. The more illicit revenues Tehran is able to generate, the less inclined it may feel to engage in productive diplomacy and offer concessions in exchange for economic relief. Continued hostage diplomacy also stands to provide Tehran with access to formerly frozen oil funds, even if remaining under humanitarian auspices, since money is fungible. Indeed, the recent hostage agreement Washington participated in is slated to offer Tehran access to \$6 billion. This builds on a previous \$10 billion made available from Iraq.^{vii} The more economic wherewithal the Islamic Republic has, the more resources it will be able to free up to support its destabilizing foreign and security policies.

In addition to money, the aforementioned hostage deal is reportedly slated to trade prosecuted Iranian criminals for innocent American hostages while failing to secure the release of all American nationals — as defined by the Levinson Act — that remain hostage in Iran. At the time of this writing, at least three such U.S. nationals, Shahab Dalili, Afshin Sheikholeslami Vatani, and Jamshid Sharmahd, were known to be excluded from the current deal.^{viii} Tehran is unlikely to stop taking dual nationals and foreign citizens hostage so long as the West continues to be willing to pay ransom. Iranian officials have even claimed that hostage-taking is a lucrative way to resolve economic issues^{ix} and have used hostage-taking to gain leverage over adversaries.^x

Elsewhere, even American military strikes against Iran-backed Shiite militia groups (SMGs) in the region, which reportedly are now subject to a lower threshold for the use of force,^{xi} do not appear sufficient to have meaningfully deterred Iran and its proxies. Despite employing kinetic tools, the Biden administration's overall risk aversion and hesitancy to strike at the point of origin for most attacks on U.S. forces, which is often in Iraq and not Syria,^{xii} ends up signaling irresolution.

On the diplomatic front, Iran's interest in political engagement with U.S. partners is being misread in Washington as a bid for de-escalation. While Tehran's outreach to Riyadh and restoration of diplomatic relations represents a new approach in Iran's regional policy, it is part of a larger and more coherent pre-existing strategy of working to foster hedging by U.S. partners against U.S. interests by casting doubt on Washington's capability to serve as an effective external balancer and security guarantor.^{xiii} In this vein, Iran's diplomacy with Saudi Arabia is not divorced from, but rather complements and cements, the gains made amid its low-cost strategy to arm Houthi rebels in Yemen against Saudi Arabia.^{xiv} It is also a high-profile pushback to the Abraham Accords and complicates normalization between the Arab world and Israel. In the long run, the Islamic Republic still seeks to evict American forces from the region, but in the short-to-medium term it is trying to force a more accommodationist posture on regional states through a mix of diplomacy and extortion.^{xv} Such a policy is not akin to de-escalation and therefore should not be welcomed.^{xvi}

Determined to focus its efforts on great-power competition — i.e., threats from Russia and China — Washington is failing to connect the dots between regional and great-power competition. Revisionist imperatives shared by Iran, China, and Russia are driving these authoritarian but ideologically distinct regimes to increasingly collaborate and contest American power and the liberal world order it underpins.

For example, regardless of the vigor with which Washington enforces U.S. sanctions, China has been the largest importer of Iranian crude oil for the past decade.^{xvii} Beijing has also inked a 25-year strategic agreement with Tehran designed to foster greater economic and military integration. There can be no discussion of curtailing Iran's asymmetric military capabilities and nuclear program without addressing China's underwriting of the Iran threat through oil payments.

Iran has also shown a willingness in recent years to run risks — including towards greater sanctions exposure and political censure — to tighten ties with Russia. Iran's provision of loitering munitions (LMs) and unmanned combat aerial vehicles (UCAVs) to Russia for use in Ukraine represents a game-changer in the Iran-Russia relationship and the nature of the Iranian threat to Europe. Iran's drone proliferation helps Russia prolong its war against Ukraine by using cheaper (at first foreign, imported and now potentially locally produced) unmanned aerial systems (UASs) as replacements for long-range strike platforms like cruise and ballistic missiles. Iran may even proliferate ballistic missiles to Russia, as was reported by government sources last year. In a historic first, at the ARMY-2023 arms exposition this August in Moscow, an Iranian close-range ballistic missile (CRBM) was put on display.^{xviii} In return, Iran may receive Russian weapons like the Su-35 4th generation fighter jet or the S-400 surface-to-air missile (SAM) system.^{xix} Already, the Yak-130, a Russian trainer aircraft, has appeared in Iran.^{xx} Iran and Russia

are also likely to step up their economic cooperation, particularly bartering and sanctions busting, as Western policymakers increasingly use coercive economic measures against both states.

Evolving Threats:

Nuclear: Iran's fuel-cycle activities and violations of the JCPOA intensified late in 2020 and have grown in scale and scope since 2021.^{xxi} This was a marked shift in Iran's incremental nuclear escalation strategy seen from 2018 to 2020^{xxii} and occurred despite attempts by the Biden administration to return to the JCPOA and lift sanctions. By late 2021, Iran made significant nuclear gains that experts believe provided it with "irreversible" nuclear knowledge.^{xxiii} These steps included enrichment of uranium to 60 percent purity (just a hair's breadth away from 90 percent purity, which is considered weapons-grade^{xxiv}), the production of uranium metal (used in nuclear weapons cores) using highly-enriched uranium (HEU), and the production, testing, and employing/operating of more advanced gas centrifuges (which spin and purify uranium at greater rates with less breakage). More worrisome, early this year, Iran briefly enriched uranium to 83.7 percent purity. While recent (September 2023) International Atomic Energy Agency (IAEA) reporting does indicate a slight downturn in Iran's rate of enriching uranium to 60 percent purity as well as a dip in Iran's overall uranium stockpile due to down-blending, the 20 and 60 percent stocks reportedly continued to increase, meaning Tehran continued producing and stockpiling more HEU since the last IAEA assessment in May. Iran also continued to impede the IAEA's mission via visa denial to select inspectors, continued to block access to surveillance camera footage, and refused to come clean on traces of manmade uranium particles found in two previously undisclosed nuclear sites.^{xxv} Based on recent IAEA figures, experts now assess Iran could produce sufficient uranium at weapons grade levels for six bombs in one month, and using its entire declared stockpile, could produce up to 10 bombs worth of weapons grade uranium in four months.^{xxvi} Elsewhere, Iran's capability and intent to develop deeper nuclear facilities,^{xxvii} be they for centrifuge manufacturing or enrichment, are poised to complicate the credibility of a military option against Tehran's nuclear program.

Missile/Drone: The Islamic Republic's security strategy places a premium on mastery of the entire spectrum of unmanned aerial threats to include mortars, rockets, drones (both LMs and UCAVs), cruise missiles, and ballistic missiles to punish, coerce, and deter. Iran continues to procure, produce, and proliferate these platforms and technologies associated with them, which stands to make Tehran and its proxies more capable asymmetric and potentially hybrid military actors.

Since the end of the Iran-Iraq War in 1988, Tehran has engaged in 13 overt ballistic missile operations against foreign targets (including against U.S. forces in Iraq in January 2020) from its own territory. Between agreeing to the JCPOA and the end of last year (July 2015-December 2022), Tehran launched at least 228 ballistic missiles (including space/satellite-launch vehicles [SLVs]) in tests, drills, and military operations from its own territory.^{xxviii} Iran is already in possession of the largest arsenal of ballistic missiles in the Middle East,^{xxix} with progress made on maneuverability, survivability, and, most importantly, precision over the last decade. Several more tests occurred in 2023 as well as the unveiling of two new and important platforms, one of which utilizes an allegedly storable liquid propellant and is based on a nuclear-capable North Korean ballistic missile. Dubbed the Khorramshahr-4, the medium-range ballistic missile (MRBM) can travel 2,000 kilometers. The other system, called the Fattah, utilizes solid propellant and is a two-stage MRBM with its second stage featuring a smaller solid-propellant motor that has thrust-vectoring control/capabilities (TVC). While the Iranian press hailed the Fattah as their first hypersonic ballistic missile, more aptly, the projectile employs a maneuverable re-entry vehicle (MaRV) likely aiming to create the impression of a hypersonic glide-vehicle (HGV). The Fattah's range is 1,400 kilometers, enabling Iran to strike all of Israel with this munition from Iranian territory.^{xxx} Iran's progress on multi-stage platforms, re-entry vehicle design, solid propellants, and larger diameter SLVs could help it eventually develop longer-range strike platforms, such as intermediate-range ballistic missiles (IRBMs) and potentially even intercontinental ballistic missiles (ICBMs). Worryingly, Iran already possesses and has tested a three-stage solid-propellant SLV dubbed the Qa'em-100. In addition to

reaching for higher ranges, Iran has been developing a series of precision-strike CRBMs that are also being used in regional military operations. Last September, for the first time ever, an Iranian CRBM strike on northern Iraq killed a U.S. citizen.^{xxxii} The more capable Iran's ballistic missile arsenal becomes (coupled with the diminishing perception of any cost or punishment following their employment), the more often these weapons will be used.

Complementing Iran's ballistic missile arsenal are the regime's more limited but evolving land-attack cruise missiles (LACMs), which offer diverse striking options against land-based air and missile defenses. Tehran currently possesses five different types of subsonic LACMs, the Soumar, the Hoveizeh, the Ya-Ali, the Quds-1, and the newest, the Paveh, the first two of which are based on the Soviet Kh-55. Progress on engine development (turbojet and turbofan) continues, with Tehran most recently alleging construction of a new ramjet engine,^{xxxiii} which if employed in an LACM would provide Iran with its first ever supersonic cruise missile capability. Drones, especially LMs, which complement Iran's missile forces and are often called "the poor man's cruise missile," are a hallmark of Iran's reliance on UASs to strike at opponents, signal support to proxies, and deter adversaries.^{xxxiii} Despite a robust and growing domestic defense industrial base, Iran remains reliant on foreign illicit networks to procure Western components for its drones. This has especially been the case for the Shahed-136/131 LMs that are being sent to Russia. Iran is also upgrading its UCAVs, such as the Mohajer class, enabling them fly longer ranges, stay airborne longer, and carry a more diverse array of bombs. Iran has also used UCAVs with ballistic missiles in what appear to be proto-combined arms operations and is likely to attempt to refine this capacity in the future. The cost, increasing publicity, and proven capability of Iranian drones is making Tehran an increasingly attractive military market for states that harbor an anti-American disposition.^{xxxiv}

Regional Terror Proxies: The Islamic Republic's material support for terrorism continues, especially as regional conflict zones have provided the opportunity to coopt or control local populations to support Tehran's strategic and ideational aims. Iranian officials term this diverse array of armed populations and terror groups the "Axis of Resistance." It comprises SMGs (including various Arab but also Afghani and Pakistani Shiites) in Iraq and Syria, the Assad regime in Syria, Hezbollah in Lebanon, Houthi rebels in Yemen, and terror groups like Hamas and Palestinian Islamic Jihad (PIJ) in Gaza. Iran's ability to marshal these forces into a foreign legion allows Tehran the ability to mask its hand in conflicts and thereby limit escalation to jurisdictions outside Iranian territory. According to U.S. government estimates, between January 2021 and March 2023, Iran-backed SMGs attacked U.S. forces in the Middle East at least 78 times.^{xxxv} While escalation and terror operations by SMGs have multiple causes, the confluence of local actor (militia) and foreign patron (Iran) interests often means that any lull in attacks, which the United States is currently experiencing, can end at a moment's notice. The nature of Iranian material support to its proxies has also evolved over time. For example, Iran's support to Lebanese Hezbollah has moved from wholesale rocket transfers to helping Hezbollah develop a precision-guided munition (PGM) capability, a capability that cannot be ignored by Israeli defense officials. Other examples of a move to indigenized weapons production can be seen in the newer and longer-range rockets used by Iranian proxies in Gaza^{xxxvi} as well the delta-wing attack-drones in the possession of SMGs in Iraq and the Houthis in Yemen. Such a policy reduces the utility of interdiction operations while creating a more sustainable forward-deployed conventional deterrent by Iran. Additionally, the geographic spread of these proxies affords Tehran the ability to test new weapons systems against the varying defenses of its adversaries before introducing them into the Iranian arsenal.^{xxxvii}

Domestic Repression: Iran's harsh suppression of street protests and rights activists continues. Since the "Women, Life, Freedom" protests began last September, the regime has killed a reported 637 protestors, of which 79 were minors. Increasing violence by the state against demonstrators is an indicator of both desperation and the severity of the threat pro-regime forces believe they face. Tracing the evolution of Iranian demonstrations over time, it is painstakingly clear that since at least 2017, street protests have moved away from the idea of incremental reform and instead seek to change the entire system.^{xxxviii} This

has led to Iranians protesting more often, with shorter intervals between protests and greater use of non-political triggers (like economic, social, and environmental matters) to create protests against the regime. This evolution has not gone unnoticed by Iran's security apparatus, which has also taken to using localized and even national internet blackouts to hamper the Iranian people's ability to share their message and plight with the outside world as well as their ability to organize domestically and communicate with one another. Elsewhere, the regime has taken to using its "injustice" system against protestors and dissidents. FDD has created an interactive online portal documenting the regime's crackdown against protestors, noting that amid the 4,381 instances of protest since last September, the regime arrested 22,045 persons.^{xxxix} Iran's injustice system also continues to use the death penalty for a broad array of offenses, including drug related ones. In 2023, the regime executed 60 prisoners in a two-week period between April and May alone.^{xl} This brings the total number of executions in Iran for the first six months of 2023 to 173, the majority reportedly being drug offenses.^{xli}

Policy Responses:

As the strategic landscape shifts, policymakers, specifically Congress, should shape U.S. policy toward Iran in accordance with four basic tenets, as outlined below:

- 1) **Do no harm to the U.S. position.** Washington cannot afford own goals that would empower the regime in Tehran or provide it with a better platform to make its case.
 - a. Examples of things to be avoided include secret side deals, ransom payments, and other potentially unwritten agreements with Tehran that shore up the Islamic Republic's financial position and give it a political lifeline. Additionally, offering Iran's president a visa to attend the UN General Assembly in New York at the time of nationwide protests or mass rights violations constitutes an own goal.
- 2) **Connect the dots for the American public.** In an era of great-power competition and a rising tide of isolationism, the American public deserves to know exactly how and why the Iran threat continues to matter.
 - a. Policymakers should continue to highlight Iran's role in supporting Russia's war against Ukraine and China's role in bolstering Iran's military, nuclear, and missile capabilities through oil sales.
- 3) **Bridge the gap with international partners.** A united trans-Atlantic sanctions architecture against the Islamic Republic is an effective multilateral tool.
 - a. A web of sanctions against the same target communicates a strong political message and impedes illicit Iranian financial activity across a greater geographic range. For example, the U.S. Treasury Department could sanction Iran's Press TV, an English-language propaganda outlet that has been sanctioned by the EU.^{xlii} Similarly, it should help European nations with drone, missile, terrorism, nuclear, and cyber-related targets.
- 4) **Support and amplify the messages of brave Iranians.** The boom-and-bust cycle of protests and the century-plus-long struggle for representative government in Iran means there will be more protests in the future, which is something Washington can ill afford to ignore or get caught flat-footed on.
 - a. Standing with the Iranian people in practice and not just in principle requires making sure they can access the internet using virtual private networks (VPNs) and satellite internet and can benefit from a strike fund should they be able to marry street power with nationwide labor strikes.

In addition to these four tenets, there are (at least) 10 pieces of legislation drafted by the 118th Congress in various stages of the legislative process that could help Washington more credibly signal resolve and find new vectors of pressure against the Islamic Republic. While there is no statutory magic bullet, these bills have the capacity to bolster America's "price floor" on Iran policy and regain leverage given the issues they touch on and are summarized below.

- **H.R. 589: Mahsa Amini Human Rights and Accountability (MAHSA) Act** – Requires a determination about the applicability of human rights sanctions to senior Iranian officials like the supreme leader and president and their offices.
- **H.R. 3152: Fight and Combat Rampant Iranian Missile Exports (CRIME) Act** – Targeted sanctions against the foreign missile, missile technology, and drone procurement, production, and proliferation networks.
- **H.R. 869: Revoking Entry Granted to Iranian Mullahs and Elites (REGIME) Act of 2023** – To determine and potentially revoke visas that may have been granted to Iranian officials or their associates and family members.
- **H.R. 3774: Stop Harboring Iranian Petroleum (SHIP) Act** – Targets foreign ports and refineries known to be processing/possessing Iranian petroleum.
- **H.R. 3033: Solidify Iran Sanctions Act of 2023 (SISA)** – Repeals the sunset provisions in the original 1996 Iran Sanctions Act text.
- **H.R. 931: Stop Corrupt Iranian Oligarchs and Entities Act** – Contains reporting requirements about parastatal entities and oligarchs and their ties to the government of Iran.
- **H.R. 1809: Block the Use of Transatlantic Technology in Iranian Made Drones Act** – Requiring the development of a national strategy based on sanctions and export controls to prevent Western technology being used in Iranian UASs.
- **H.R. 691: Sanctioning Iranian-Backed Militia Terrorists Act** – To impose sanctions on Kata'ib Sayyid al-Shuhada (KSS), an Iran-backed SMG that has attacked U.S. forces.
- **H.R. 2958: Closing IRGC Sanctions Loopholes Act** – Using sanctions to target additional foreign agents/affiliates of the Islamic Revolutionary Guard Corps (IRGC).
- **H.R. 3035: Iran Human Rights and Accountability Act of 2023** – Determining the applicability of human rights sanctions against select persons and reporting requirements about the supreme leader's net worth and human rights abuses in Iran.

Building on those 10 pieces of legislation are a broad swath of recommendations from two FDD reports on Iran in the past year that can help policymakers looking to thread the needle on the Iran challenge from both a human rights/democracy promotion and a national security perspective. Specifically, these reports offer a roadmap for Washington to offer “Maximum Support” to Iranian protestors^{xliii} and develop a pressure-based Plan B on Iran using the interagency process.^{xliiv} Those recommendations complement the list of domain-specific policy proposals on Iran additionally offered below:

Military:

- Expedite the development of a U.S.-Gulf Cooperation Council integrated air and missile defense (IAMD) architecture to protect deployed U.S. forces and American partners.^{xliv}
- Require a report from the Pentagon on current missile and drone protection for U.S. troops in the Middle East.^{xlvi}
- Push the Pentagon to multilateralize existing bilateral military exercises in the CENTCOM area of responsibility where possible to create a more effective American-Arab-Israeli deterrent.^{xlvii}
- Sustain and bolster U.S. and partner freedom of navigation and maritime security operations in the Persian Gulf, Strait of Hormuz, Arabian Sea, Gulf of Aden, and Red Sea.^{xlviii}
 - Invite Israel to join the Combined Maritime Forces and Combined Task Force 153.^{xlix}
 - Support efforts of Task Force 59 to integrate unmanned systems and artificial intelligence.^l
- Forcefully respond to attacks on U.S. positions by Iran-backed SMGs to bolster deterrence by punishment.
- Investigate potential collaboration between Russia, Iran, and the Assad regime to evict U.S. forces from Syria.^{li}

- Take steps to expedite and ensure that Israel has KC-46 air refueling aircraft to support combat operations.^{lii}

Economic/Financial:

- Create a taskforce within the Treasury Department’s Office of Foreign Assets Control dedicated solely to tracking Iranian oil and petrochemical smuggling/shipping operations and vigorously enforcing related penalties.
- Consider using counternarcotic, specifically Kingpin, authorities against Iran-backed SMGs in the Middle East, particularly over their alleged role or beneficiary status in the captagon trade.^{liii}
- Use Magnitsky sanctions against Iranian officials (beginning with Iran’s supreme leader and president) and corrupt regime elites early and often. Coordinate the use and roll-out of these penalties with jurisdictions like the UK, EU, Canada, New Zealand, and Australia, which have similar authorities.
- Work with the State Department to expand metals sanctions on Iran under the Iran Freedom and Counterproliferation Act (IFCA) of 2012.
- Maintain good sanctions hygiene by updating designations to account for the musical chairs in leadership executive positions across sanctioned industries and entities in Iran.^{liiv}

Political/Diplomatic:

- Congress should insist that any new nuclear agreement with Iran, however informal or unwritten, be submitted for review under the Iran Nuclear Agreement Review Act (INARA) of 2015.
- Consider appointing an Iran democracy special envoy, or “czar,” in charge of managing an interagency process dedicated to supporting Iranian protestors and dissidents and to coordinate counter-Islamic Republic messaging.
- Use every opportunity at quarterly IAEA Board of Governors meetings to support resolutions of censure against the Islamic Republic for its obstruction of inspections and failure to resolve issues surrounding manmade uranium particles at undeclared nuclear sites.
- Work with the EU and UK to “snapback” and restore penalties on Iran’s nuclear, missile, and military programs found in UN Security Council resolutions on Iran between 2006 and 2010.
 - Following “Transition Day” this October, expediate the sharing of information with the EU and UK on potential nonproliferation and missile sanctions targets.
- Call for and work to support the full proscription of the IRGC under terrorism authorities by U.S. allies and partners in the UK, EU, Canada, Australia, and New Zealand.
- Increase the use and seek to broaden the scope of visa ban authorities found in 7031(c) of the Department of State, Foreign Operations, and Related Programs Appropriations Act against Iranian officials and their families engaged in rights abuses.
- More effectively embrace the bully pulpit on Iran by developing a global campaign to publicize and highlight the names of foreign persons and/or dual nationals held hostage in Iran.
- Do not work to support the rehabilitation of Iran’s sole state ally in the Middle East, the Assad regime in Syria.^{liv}
- Do no harm to U.S. nonproliferation aims in the Middle East while fostering political normalization between Israel and Saudi Arabia.

Thank you very much for your time, attention, and leadership on the Iran challenge at this critical time. I look forward to your questions.

ⁱ <https://www.ft.com/content/b8ace6d3-9c2b-4024-91a4-e0558a6fb12c>

ⁱⁱ For more on the lapsing penalties and impact, see: <https://www.fdd.org/wp-content/uploads/2023/09/fdd-faq-avoiding-an-october-sanctions-surprise-that-would-empower-tehran.pdf>

ⁱⁱⁱ <https://www.reuters.com/world/middle-east/europeans-plan-keep-ballistic-missile-sanctions-iran-2023-06-28/>

^{iv} <https://www.fdd.org/wp-content/uploads/2023/06/fdd-memo-how-congress-should-respond-to-an-interim-iran-deal.pdf>

- ^v <https://en.mehrnews.com/news/204597/Tehran-never-looks-for-temporary-agreement>; <https://ettelaat.com/0003fK>
- ^{vi} <https://www.reuters.com/article/iran-oil-exports/iran-says-oil-exports-surpass-1-4-million-bpd-target-tasnim-idUSS8N2Z00AZ>;
<https://www.bloomberg.com/news/articles/2023-08-21/iran-s-booming-oil-flows-surge-above-2-million-barrels-a-day#xj4y7vzkg>
- ^{vii} <https://www.fdd.org/analysis/2023/08/15/u-s-to-provide-iran-access-to-16-billion-in-frozen-funds/>
- ^{viii} <https://www.atlanticcouncil.org/blogs/iransource/levinson-act-green-card-dalili-vatani-sharmahd/>
- ^{ix} See comment by Mohsen Rezaie in: <https://kayhanlife.com/authors/analysis-how-hostage-taking-is-an-integral-part-of-irans-foreign-policy/>
- ^x See Swedish case in: <https://www.dw.com/en/swedish-eu-diplomat-held-in-iran-for-over-500-days-borrell/a-66729382>
- ^{xi} https://www.washingtonpost.com/national-security/biden-military-strikes-policy/2021/07/01/9ab7d7d0-da60-11eb-ae62-2d07d7df83bd_story.html; <https://www.fdd.org/analysis/2020/05/05/collecting-and-analyzing-shiite-militia-attacks-against-the-us-presence-in-iraq/>
- ^{xii} <https://www.wsj.com/articles/drone-attack-on-syria-base-came-from-iraqi-militants-u-s-officials-say-11661853601>;
<https://www.wsj.com/articles/drone-strike-that-killed-u-s-contractor-in-syria-was-launched-by-iran-backed-militia-in-iraq-3a5e368a>
- ^{xiii} Examples likely include: the June 2019 Iranian downing of a U.S. drone, the September 2019 Iranian cruise missile and suicide-drone attack against Saudi oil installations, the January 2020 retaliatory Iranian ballistic missile barrage at U.S. positions in Iraq, the July 2021 Iranian suicide drone attack against an Israeli-owned vessel that killed a British and Romanian national, the January-February 2022 Houthi cruise and ballistic missile and suicide drone attacks on the UAE, and the September 2022 Iranian ballistic missile attack on Iraqi Kurdistan.
- ^{xiv} <https://www.axios.com/2019/08/24/iran-sees-growing-dividends-from-support-for-yemens-houthis>
- ^{xv} Recall that nearly two weeks after the September 2019 drone and cruise missile attacks on Saudi Arabia by Iran, then President Hassan Rouhani employed an Arabic proverb in his UNGA address (“First the neighbor, then the house” or الجار ثم الدار) to incentivize Saudi and regional hedging towards Iran and away from supporting the Trump administration’s maximum pressure policy in the short term and the U.S. presence in the region in the long term. See: <https://www.aparat.com/v/GaSfB>
- ^{xvi} <https://www.voanews.com/a/white-house-welcomes-chinese-brokered-saudi-iran-deal/6999700.html>
- ^{xvii} <https://crsreports.congress.gov/product/pdf/RS/RS20871/318>; <https://www.al-monitor.com/originals/2023/08/irans-oil-exports-china-hit-10-year-high>
- ^{xviii} <http://www.yjc.ir/00ZkhG>
- ^{xix} See references to potential Iranian interest in these platforms post arms-embargo in: https://www.dia.mil/Portals/110/Images/News/Military_Powers_Publications/Iran_Military_Power_LR.pdf
- ^{xx} <https://tn.ai/2951953>
- ^{xxi} <https://www.fdd.org/wp-content/uploads/2023/03/fdd-visual-exploiting-america-declining-pressure-iran-nuclear-escalation-Mar2023.jpg>
- ^{xxii} <https://thehill.com/opinion/international/464601-making-sense-of-irans-nuclear-moves/>
- ^{xxiii} <https://isis-online.org/isis-reports/detail/irans-recent-irreversible-nuclear-advances>
- ^{xxiv} <https://www.fdd.org/analysis/2023/08/25/irans-nuclear-concession-may-not-be-one-at-all/>
- ^{xxv} <https://apnews.com/article/iran-uranium-enrichment-iaea-us-tensions-af4a183a2e97375708a494d5324c2836>;
<https://www.timesofisrael.com/iaea-regrets-lack-of-iranian-cooperation-stockpile-of-60-enriched-uranium-grows/>
- ^{xxvi} <https://isis-online.org/isis-reports/detail/analysis-of-iaea-iran-verification-and-monitoring-report-september-2023/>
- ^{xxvii} <https://apnews.com/article/iran-nuclear-natanz-uranium-enrichment-underground-project-04dae673fc937a04e62b65dd78db2e0>
- ^{xxviii} <https://www.fdd.org/wp-content/uploads/2023/02/fdd-monograph-arsenal-assessing-iran-ballistic-missile-program.pdf>
- ^{xxix} <https://www.dni.gov/files/ODNI/documents/assessments/ATA-2023-Unclassified-Report.pdf>
- ^{xxx} For more on these platforms, see: <https://www.politico.eu/article/iran-ballistic-missile-capabilities-growing-threat-europe/>
- ^{xxxi} <https://www.al-monitor.com/originals/2023/03/family-us-citizen-killed-irgc-strikes-sues-iran>
- ^{xxxii} <https://www.reuters.com/world/iran-says-it-has-obtained-supersonic-cruise-missile-technology-tasnim-2023-08-09/>
- ^{xxxiii} For more on drone use, see: <https://warontherocks.com/2023/09/iranian-drone-proliferation-is-scaling-up-and-turning-more-lethal/>
- ^{xxxiv} Iranian officials allege that at least 22 countries are interested in their drones: <https://tn.ai/2789752>
- ^{xxxv} <https://www.wsj.com/articles/mideast-challenges-mount-for-u-s-as-china-and-russia-make-gains-d2162906>
- ^{xxxvi} <https://nationalinterest.org/feature/redefining-iran%E2%80%99s-role-its-latest-%E2%80%98shadow-war%E2%80%99-against-israel-185947>
- ^{xxxvii} This was the case with the Quds LACM in 2019 and more recently, for the first time with respect to MRBMs, in the case of the Burkan-3/Zolfaghar, which was dubbed the Rezvan when unveiled in Iran during a military parade in September 2022.
- ^{xxxviii} <https://www.jstor.org/stable/26939971>
- ^{xxxix} Figures current as of September 7, 2023: <https://www.fdd.org/analysis/2023/01/27/mapping-the-protests-in-iran-2/>
- ^{xl} <https://www.hrw.org/news/2023/05/12/iran-alarmed-surge-executions>
- ^{xli} <https://www.amnesty.org/en/latest/news/2023/06/iran-prisons-turned-into-killing-fields-as-drug-related-executions-almost-triple-this-year/>
- ^{xlii} <https://www.consilium.europa.eu/en/press/press-releases/2022/11/14/iran-eu-adopts-additional-sanctions-against-perpetrators-of-serious-human-rights-violations/pdf>
- ^{xliiii} <https://www.fdd.org/wp-content/uploads/2022/10/fdd-memo-maximum-support-for-the-iranian-people.pdf>
- ^{xliiv} <https://www.fdd.org/wp-content/uploads/2023/01/fdd-monograph-strategy-for-a-new-comprehensive-u.s.-policy-on-iran.pdf>
- ^{xli v} <https://www.fdd.org/analysis/2023/02/15/eyeing-tehran-u-s-and-gcc-partners-look-to-develop-regional-security-architecture/>
- ^{xli vi} The Commander of Iran’s Islamic Revolutionary Guard Corps Aerospace Force likened U.S. bases/forces in the region to being akin to “meat under teeth” in relation to Iranian missiles and drones. See: <https://www.aparat.com/v/gF2dw>
- ^{xli vii} <https://www.defensenews.com/opinion/commentary/2021/11/12/expand-israel-arab-us-military-drills-to-counter-iran-and-its-proxies/>
- ^{xli viii} https://www.fdd.org/in_the_news/2023/08/11/iranian-maritime-aggression-and-the-us-military-buildup/
- ^{xli ix} <https://www.defensenews.com/opinion/commentary/2023/01/09/add-israel-to-the-combined-maritime-forces-and-its-red-sea-task-force/>
- ^l <https://www.fdd.org/events/2023/02/24/securing-contested-waters-a-conversation-with-navcent-commander-vice-adm-cooper/>
- ^{li} <https://understandingwar.org/backgrounder/iran-russia-and-syrian-regime-are-coordinating-expel-us-forces-syria>
- ^{lii} <https://www.defensenews.com/opinion/commentary/2022/04/21/israel-has-a-ke-46-problem-heres-the-solution/>;
- ^{liii} <https://www.fdd.org/analysis/2022/09/02/pentagon-announces-contract-for-israeli-ke-46s/>
- ^{li iv} See potential linkages in: <https://www.chathamhouse.org/publications/the-world-today/2022-06/battle-against-captagon>
- ^{li v} As described in: <https://www.atlanticcouncil.org/blogs/iransource/sanctions-iran-shamkhani-ahmadian-nioc/>
- ^{li vi} Which is already under congressional consideration: <https://www.congress.gov/bills/118th-congress/house-bill/3202/text>