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Subcommittee on Europe & Subcommittee on Middle East, North Africa, and Central Asia

The Despotic Duo:

Russo-Iranian Cooperation and Threats to U.S. Interests

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Introduction:

Chairmen Wilson and Keans, Ranking Members Phillips and Keating, distinguished members of the House Foreign Affairs Committee's Middle East, North Africa and Central Asia Subcommittee and Europe Subcommittee, thank you for the opportunity to testify. It is a privilege to present my analysis alongside Gabriel Noronha and Dana Stroul, both of whom have served in the U.S. government and have since contributed to a better public understanding of the challenges Russia and Iran pose to our national security.

My written testimony examines the strategic situation Washington must grapple with, then traces the history of Iran-Russia relations to show how and why Moscow and Tehran moved toward greater cooperation. The testimony then focuses on key components of this cooperation today as seen in Ukraine, before looking to future threats and sharing policy options.

Strategic Backdrop:

My testimony today comes at a critical time. America's authoritarian adversaries are drawing closer together, constituting a new revisionist axis. These states are bridging their differences and sharing experiences about how best to contest U.S. power and influence around the world. U.S. military capabilities alone are insufficient to meet this challenge.

Specifically, Russia and Iran increasingly support one another's foreign and security policies. These states are not natural allies. Instead, they are being driven together by a combination of forces including domestic political considerations like regime survival, opportunities and threats presented by changing regional military balances, and the salience of anti-Americanism as both a strategy and an ideology. When married with the perception of political irresolution and strategic drift emanating from Washington — likely shared by both Iranian Supreme Leader Ali Khamenei and Russian President Vladimir Putin — these opportunistic actors will press their advantage. This perception will take time to offset.

Contrary to the views of some, American assertiveness or support for international partners is not the primary driver behind Moscow and Tehran's tightening of ties. Nor is it the rationale for their increasing outreach to other revisionist authoritarian powers, be it the Communist Party in China, the Kim regime in North Korea, or the Assad regime in Syria. Rather, as former U.S. Secretary of Defense General James Mattis used to say, "The enemy gets a vote." To that end, Russia and Iran have been showing the world in which direction they will vote, using anti-Americanism and opposition to the U.S.-led world order as a least common denominator to scale-up their relationship. The more Washington chooses to treat these threats in isolation from one another and takes a geographically bounded view of great power competition, the more likely it will underwrite the predation of and instability caused by these two actors.

From Turbulent to Transactional Relations:

Former U.S. Secretary of State Henry Kissinger once said, "There are few nations in the world with which the United States has less reason to quarrel or more compatible interests than Iran." But the exact opposite could be said about Russia and Iran. Both states compete to export their most important commodity: petroleum. Within this economic rivalry are geostrategic tensions in areas like the Caspian Sea basin — the world's largest lake — over energy rights, boundary demarcations, and environmental concerns. And abetting this modern competition is a legacy of mistrust going back several centuries.

Iran lost territories in the Caucasus to Tsarist Russia amid irredentist, imperialist, and politico-religious fervor in the early 19th century. Following these conquests, anti-Russian sentiment in Iran led to the storming of the Russian embassy in Iran and the killing of its staff by a Tehran mob in 1829. By 1907, Russia, along with Great Britain, had carved Iran into political and economic spheres of influence. Russia also opposed Iran's Constitutional Revolution (1905-1911), and a Russian colonel even led the Persian Cossack Brigade while bombing Tehran's nascent parliament in 1908. Despite Iran's official neutrality in World War I, occupation by

Russian forces (along with British and Ottoman forces) contributed to massive famine. World War II ended with attempts to annex northern Iran and, when that failed, to sponsor separatist movements in Iran's Azerbaijan and Kurdistan provinces. Following the war, the Soviet Union sponsored the Communist party (known as the Tudeh or "masses" party) of Iran against the U.S.-backed Pahlavi dynasty, which outlawed the party, forcing its activities underground. The Tudeh later ended up being but one of many actors in the constellation of forces that toppled the monarchy in 1979. Yet this was insufficient for the Soviets to win support from the new revolutionary regime.

As early as 1980, the founding father of the Islamic Republic, Ayatollah Ruhollah Khomeini, publicly warned Iranians of "the dangers of communist powers." During the Iran-Iraq War (1980-1988), the Soviets armed the Ba'athist regime of Saddam Hussein against Iran, i leading the regime to famously inscribe on its Scud missiles: "Death to the Soviet Union" (among other slogans). Khomeini even invited General Secretary of the Communist Party of the Soviet Union Mikhail Gorbachev to abandon communism and embrace Islam. Iran's official foreign policy motto, "Neither East, Nor West, Islamic Republic," was coined against this backdrop.

For nearly two decades following the collapse of Soviet communism, opportunities for convergence and compartmentalization between Iran and Russia ebbed and flowed. While Tehran and Moscow were on opposing sides of numerous crises in the Balkans in the 1990s, Russo-Iranian collaboration emerged in checking the Republic of Azerbaijan and NATO-allied Turkey, containing the Sunni Taliban in Afghanistan, ending the civil war in Tajikistan, and, of course, the arms trade. Iran began to rebuild its military after the end of the Iran-Iraq War and turned to Russia, purchasing T-72 tanks, Kilo-class submarines, and aircraft such as MiG-29 fighter jets and Su-24 tactical bombers. Throughout the 1990s, despite a reportedly secret deal between Moscow and Washington to get Russia to terminate arms sales to Iran, Russian sales continued and grew to include ballistic missile technology. The U.S. State Department twice sanctioned Russian firms, once in 1998 and again in 1999, for aiding Iran's long-range strike capabilities. With the rise of Vladimir Putin as President in 2000, Russo-Iranian ties deepened, and the aforementioned deal with Washington was terminated.

Russia's view of Iran as a strategic partner and Iran's criticism of NATO expansion as Western pressure on Russia have their roots in this era. *viii It was also during this time that Russia entered the equation regarding Iran's nuclear program. In 1995, Russia took over the construction of Iran's light-water reactor at Bushehr, which was initially slated to be built by Germany prior to the 1979 revolution and was bombed several times during the Iran-Iraq War. *xix* The reactor deal highlighted Russia's post-Cold War willingness to sell nuclear expertise to the highest bidder. Reportedly, the deal came with another agreement to provide Iran with gas centrifuge technology or help Iran build an enrichment plant, which was terminated due to U.S. pressure. Russian assistance to Iran's nuclear program also included technology for laser isotope separation and an agreement in 2005 to provide Iran with low-enriched uranium to power the Bushehr reactor — which commenced operations in 2011, albeit over time and over budget — as well as to take back the spent fuel. Iran, which took control of the reactor in 2013, seeks to provide enriched uranium for the reactor itself but still has a 10-year arrangement with Russia expiring in 2026. *xx

As this experience shows, Iran and Moscow managed to keep the door open for cooperation with one another despite the occasional impediments or penalties from Washington. And for all the talk of independence and self-sufficiency from Tehran, it coveted an anti-status quo great power patron. But for the Russo-Iranian relationship to materialize into what we see today, two final hurdles had to be crossed: the nuclear crisis with the West and the Syrian Civil War.

After European diplomatic initiatives failed to resolve the tensions stemming from the 2002 revelation of previously undisclosed uranium enrichment facilities in Iran, Russia joined the West in voting for every major United Nations Security Council resolution (UNSCR) from 2006 through 2010 calling upon Iran to cease uranium enrichment.^{xxi} During this time, despite inking two major surface-to-air missile (SAM) deals, Russia only

delivered the Tor-M1 to Iran in 2007 and halted its delivery of the more advanced S-300 SAM until 2016. Iran deployed the latter (technically the S-300 PMU2) around its nuclear facilities soon after its delivery. xxiii Russia also worked with the P5+1 (the five permanent members of the UNSC plus Germany) to help attain the 2013 Joint Plan of Action (JPOA) and 2015 Joint Comprehensive Plan of Action (JCPOA) nuclear deals. In fact, the JCPOA carved out a specific role for Russia. It may seem anathema in 2024, but the idea that Russia was a safe place to store Iran's excess enriched uranium circa 2015 was not hotly contested. Nor was the notion of Moscow being a reliable partner to ensure that only stable isotope production for purportedly medical purposes was happening at Iran's underground Fordow enrichment plant.

Nonetheless, Russia used its acquiescence to the international community's position on Iran's nuclear program as a bargaining chip to be traded away at the right price. One potential example is the Obama administration's reported decision to offer Russia to stop or stall plans for a European missile defense shield in 2009. **xiii* But even at the right price, Russia may have feared the strategic implications that even a slightly more globally integrated Iran under the auspices of the JCPOA might produce. According to a leaked audio file from former Iranian Foreign Minister Mohammad Javad Zarif, Moscow sought to prevent the 2015 deal and, along with China, had benefitted from Iran's anti-Americanism and isolation. **xiiv**

Zarif's leaked audio file also attempts to adjudicate a domestic debate in Iran over when and why Russia got involved in the Syrian civil war. Following a July trip by Iran's Islamic Revolutionary Guard Corps (IRGC) Quds Force Commander Qassem Soleimani to Moscow, Russia publicly entered the conflict in September 2015. Or so it seemed. Zarif alleges that Russia had previously made up its mind to intervene in Syria and even delayed greenlighting Soleimani's trip to the Kremlin.xxv Either way, Russia and Iran engaged in a division of labor to defend Damascus and for differing strategic reasons. For Iran, the Assad regime was Tehran's oldest state ally and a key component of its land corridor to the Eastern Mediterranean.xxvi Without Assad, Lebanese Hezbollah, Iran's most successful proxy, would be in danger. For Russia, Syria was a market for arms sales, home to the Russian Navy's only warm water port at Tartus, and, after 2015, home to the Khmeimim Air Base in Damascus. It was also an opportunity to take a stand against what it perceived was Western-supported regime change akin to what happened in Libya as well as a way to gain leverage over the West following Russia's invasion of Crimea in 2014.

The fight to save Assad aligned Moscow and Tehran in critical ways that marked a sharp break with the past 200 years of Russo-Iranian military interaction. Examples included Iran's willingness to entertain Russian cruise missile strikes over its airspace (some of which even fell in Iran) in 2015, and permission to, however briefly, stage Russian bombers in Hamedan at the Shahid Nojeh Air Base to fly sorties against targets in Syria. *xxvii But areas of divergence remained. For example, despite being partnered with Iran, Moscow kept lines of communication and deconfliction with Israel open and never provided Iranian forces or Iran-backed militias with advanced SAM coverage, such as from the S-400, against Israeli strikes.

The Problematic Present and Future:

Despite these differences, the Syrian experience fed into a larger sense of strategic alignment in Tehran with Moscow against U.S. foreign policy. There is a direct line from this sense of alignment to Iran's decision to furnish Russia with drones in 2022 for its war against Ukraine. Iran has provided Russia with hundreds of one-way attack (OWA) or "suicide" drones, like the Shahed-136 and the smaller Shahed-131, as well as trainers to help the Russians launch these systems. The Shahed-136, or the rebranded Russian Geran-2, has a maximum operational range of 2,500 km and can carry up to a 50-kg warhead. OWA drones function as the proverbial "poor man's cruise missile," as they have a similar flight profile at comparatively lesser cost and thereby allow Russia to conserve land-attack cruise missiles (LACMs) and other long-range strike platforms while still exhausting Ukrainian air defenses. Popular targets for these drones include Ukrainian critical infrastructure, static military targets, and civilian targets, all of which aim to erode the Ukrainian will to fight. In the first year and a half of the war, Russia launched well over 2,000 Shahed drones at such targets. **xviii** To date, Russia is believed to have used

an estimated 5,000-plus OWA drones against Ukraine. Iran has also provided Russia with unmanned combat aerial vehicles (UCAVs) like the Mohajer-6, which aids Russian intelligence, surveillance, and reconnaissance (ISR) efforts.

As part of a reported \$1 billion deal, Iran is also helping Russia indigenously produce these drones in Tatarstan, rendering attempts to intercept or sanction the supply of drones and related material harder. Press reports indicate that Russia is attempting to phase out Iranian (and Iranian-provided Western) components in these drones. **xx* Additionally, Russia and Iran appear to be working on an upgrade to the Shahed-136 that is jet-powered. **xxii* Iran is also providing Russia with ammunition — as is fellow "axis" partner North Korea — including a reported 300,000 artillery shells as well as 122mm rockets. **xxxii* Foreign artillery can augment those produced by Russia's defense-industrial base, offering more projectiles central to Russia's way of war and attrition strategy. There are also reports that Russia is using Iranian-produced body armor, including bullet-proof vests and helmets, in Ukraine. **xxxiii*

Washington has also warned that Tehran may provide Moscow with short-range ballistic missiles (SRBMs). Press reports allege these missiles may be from Iran's Fateh-family of solid-propellant systems, which include the Fateh-110 with a 300-km range, or the Zulfiqar which has a range of 700 km. **xxxiv** Iran has used these and other precision-strike SRBMs in numerous public military operations from its territory since 2017 with considerable success. **xxxv** In August 2023, Iran participated in Russia's ARMY-2023 military exposition, showcasing for the first time in Moscow a mock-up of the Ababil close-range ballistic missile (CRBM). In a September 2023 trip to Tehran, Russia's Defense Minister visited an IRGC military exhibition, where he inspected, among other things, the full Ababil missile. **xxxvi**

The Ababil is a modified version of the Zouhair, which, in turn, is a re-branded Ra'ad-500 SRBM, which itself is an upgrade to the aforementioned Fateh-110. The Ra'ad-500, first unveiled in 2020, features a carbon-fiber motor with a composite casing, new canard fins, and a maximum stated range of 500 km. **xxxviii* According to the data provided by Iran at the defense exposition, the Ababil's maximum stated range is 86 km while carrying a 45-kg warhead.**xxxviii* The lower weight-range ratio on the Ababil confirms a December 2022 **Axios* report about a potential Iranian desire to avoid brushing-up against the Missile Technology Control Regime (MTCR) thresholds (500 kg over 300 km) for a strategic system if/when exporting ballistic missiles to Russia.**xxxiix

Despite a recent Reuters report claiming that Iranian ballistic missiles had been transferred to Russia, they have yet to appear on the battlefield in Ukraine.xl Nonetheless, Iranian ballistic missiles, be they of the 86-, 300-, 500-, or 700-km range, would significantly alter the threat landscape in Ukraine by helping Russia conserve its own ballistic missiles. Russia is already able to do this thanks to shipments of North Korean ballistic missiles. More ballistic missiles mean more opportunities for layered attacks with drones or cruise missiles that have different flight profiles against the same target. Unlike low- and slow-flying drones, ballistic missiles fly high and fast and often with five-to-10 times the warhead weight of a Shahed drone. Ukraine also has comparatively less in the way of more expensive ballistic missile defenses (besides several U.S-provided Patriot batteries), which are currently stretched thin globally, than it does air defenses.

Be it with drones or prospectively missiles, Iranian arms proliferation in Europe marks a significant escalation. The Islamic Republic faces no strategic threat from NATO, and Iran's increasing alignment with Russia could expose it to additional Western political, economic, and potentially even military pressure. Cognizant of these risks, Tehran still calculated that the juice was worth the squeeze. Below are six reasons why.

For starters, for the first time in three decades, Iran may be able to put itself in the driver's seat of its relationship with Russia. It is now Moscow that needs urgent military assistance, and Tehran hopes its willingness to run risks to underwrite Putin's war machine will promote the Islamic Republic from the rank of junior partner and push the relationship into a more equal direction. But even if the relationship remains transactional, Tehran likely aims to

use its drone support as leverage with which to barter, bargain, or build consensus with Russia in areas where Russian support may have traditionally been less than forthcoming.

Beyond alliance management, the presence of Iranian drones in Ukraine provides the Islamic Republic with a simultaneous status and security boon. Iran's prestige as both a revisionist actor and a drone producer increases due to the demand for its weapons in new theaters of conflict. Moreover, the effectiveness of these weapons and broader international concern over their proliferation and use ends up bolstering the Islamic Republic's deterrence.

The financial consideration in moving from arms proliferator to arms producer cannot be understated. Just as post-Soviet Russia made money through arms sales, the Islamic Republic is fast positioning itself as an arms market for the third world. Tehran is getting paid for its drone transfers to Russia, and handsomely. A recent *Haaretz* exclusive citing leaked documents from an Iranian defense contractor revealed that Iran was charging just over \$190,000 per Shahed-136 drone, some of which was being paid for in cash and some in gold. To date, Russia has reportedly transferred almost four metric tons of gold ingots to Iran. Den-source estimates regarding the cost of the Shahed vary but hover around \$40,000 apiece.

Other forms of Russian "payment" include weapons systems, particularly Western anti-tank guided missiles such as Javelins or Stinger MANPADs that are captured or found on the battlefield in Ukraine. Iran's defense industrial base got its start doing reverse-engineering, and many of Iran's anti-tank missiles and anti-ship cruise missiles are unlicensed foreign copies with a mix of indigenously produced and illicitly procured parts. Tehran can choose to integrate the weapons it receives into caches for its armed forces or to proliferate them to proxies.

Then, there's the prospect of a formal military quid-pro-quo for Iran's drones. White House National Security Communications Advisor John Kirby plainly said that Russia was presenting Iran with "an unprecedented level of military and technical support that is transforming their relationship into a full-fledged defense partnership." In late 2023, Iranian press outlets officially confirmed that Tehran had secured an agreement with Moscow for the Su-35 fourth-generation fighter jet, the Mi-28 attack helicopter, and the Yak-130 trainer aircraft. To date, an unknown number of Yak-130s were reportedly transferred to Iran. The White House also warned that Iranian pilots had trained on the Su-35 in Russia in 2022. Should the Su-35 delivery go forth, it would represent the most advanced fighter jet to enter Iran's air force in several decades. But the transfer will not revolutionize the Islamic Republic's conventional military capabilities overnight, nor will it devalue the role of missiles and drones for Tehran. Instead, the addition of the fourth-generation fighter will likely be aimed at complicating any prospective destruction or suppression of enemy air defense operations — the sorts of military operations necessary to gain air superiority over an area — by a foreign adversary in the lead-up to any potential larger scale military action against regime targets or nuclear sites in Iran.

And lastly, there are battle tactics. Iranian drones can now be found in conflict zones across Asia, Africa, Europe, and South America, but each locale offers a different lesson to be learned about force employment. In Ukraine, there's the ability to learn about salvo competition against Western air defenses outside the Middle East. And while Iran initially sent trainers to occupied Ukraine to aid Russia, a recent Bloomberg report claimed that Iran learned how to "shadow" drones while in the Ukrainian theater. Reportedly, this shadowing maneuver enabled an Iranian drone (the Shahed-101) to mirror an American drone's flightpath that was landing at a U.S. base in Jordan earlier this year, targeting the base and killing three U.S. servicemembers.

Worrying trendlines:

Looking ahead, there is ample room for Iran and Russia to continue deepening their relationship, from potentially building new nuclear plants at Bushehr, xlviii to more trilateral naval exercises with China, to collaboration in the cyber domain. xlix Below, I briefly outline four areas of existing cooperation that should be on the radar of U.S. policymakers:

Space/Satellite and Missile Cooperation: Russian assistance to Iran's space program goes back to 2005, when it helped Tehran launch its first satellite, the Sina, on a Russian carrier rocket. Since then, Russia has been incrementally more involved in Iran's space program. In 2021, Russia gave Iran a Kanopus-V satellite equipped with a high-resolution camera, and trained Iranian ground crews in its use. Ii In 2022, a Russian carrier rocket launched Iran's Khayyam satellite into low-earth orbit (LEO). lii Later that year, Russia and Iran signed a space cooperation agreement. liii In 2024, Russia helped Iran launch yet another satellite, the Pars 1 research-sensing satellite. liv There is significant concern that Russia may be helping Iran launch spy satellites for military purposes that could make Iranian projectiles like ballistic missiles more accurate. This concern is compounded by Iranian attempts to emulate Russia's parallel Global Positioning System called GLONASS by seeking to develop a local-positioning system called Hoda.^{lv} There's also concern that Russia might be able to assist Iran with its Space-Launch Vehicles (SLVs). something CIA Director William Burns mentioned in 2023. Vi SLVs employ technologies similar to those of intercontinental ballistic missiles (ICBMs). In late 2023, a video allegedly from 2019/2020 surfaced showing IRGC Aerospace Force Commander Amir-Ali Hajizadeh proposing to his Russian counterpart to help Russia create a drone command if Russia helped Iran create a "space command." Iran's recent successes in launching large diameter solid-propellant and liquid-propellant SLVs offers it several routes to an intermediate-range ballistic missile (IRBM) and potentially ICBM capability while claiming to adhere to a self-imposed 2,000-km range cap for its declared ballistic missile force.

- The Syrian Theater: When Russia began withdrawing some of its forces from Syria in 2022, the IRGC Quds Force and Iran-backed militias like Lebanese Hezbollah reportedly began to backfill these positions. Viii While the status of these facilities remains unclear, and Syrian dictator Bashar al-Assad has said he seeks a more permanent Russian presence, the changing force posture by Russia in Syria has not produced more peace. Russia has continued harassment of American military aircraft in Syria and collects intelligence on U.S. bases that might be finding its way to Iran. Iix Taken together, Russia and Iran appear to be coordinating to put pressure on remaining U.S. forces in Syria to potentially evict them from the region. Leaked U.S. government documents reported by *The Washington Post* last summer claim that Russia coordinated with Iran-backed militias in Syria to help them launch rockets at U.S. bases. Ix
- Sanctions Busting/De-Dollarization: Russia and Iran continue to express an interest in trading in their national currencies, lxi but impediments to developing this banking architecture have subsisted. In the interim, bartering is likely to grow in importance. Iran and Russia have also reportedly linked their financial institutions' messaging services so as to devalue the financial messaging service known as SWIFT, from which they have both been banned. lxii Despite Iran and Russia having similar economic profiles and competing to sell discounted and sanctioned crude to China, lxiii Iran has a wealth of sanctions-busting experience, including but not limited to creating front companies in jurisdictions like the UAE, Turkey, and China and settling accounts via European banks, which Russia may well be copying. lxiv In conjunction with money laundering networks tied to Iran's IRGC Quds Force, Russian entities have previously been sanctioned by the U.S. Treasury for illicit revenue generation schemes designed to bankroll the Assad regime lxv or to help smuggle oil to aid Iran's terror proxies. lxvi
- <u>Diplomatic Cover:</u> Russia has increasingly taken on the role of diplomatic spoiler to the West in international organizations, employing bureaucratic means to slow roll or stop meaningful pressure against its axis partners. This has especially been the case with respect to Iran's nuclear program at the International Atomic Energy Agency's (IAEA) Board of Governors, where Moscow along with Beijing has voted against several resolutions calling for Iran's censure. Ixviii In the aftermath of lapsing UN prohibitions against Iranian ballistic missile tests and transfers in October 2023, Russia flaunted that it no longer needed to abide by any international regime or treaty regarding missile activity with Iran. Ixviii More recently, Russia pulled the plug on a UN Panel of Experts at the UNSC whose mandate was to monitor Pyongang's compliance with international sanctions. Ixix

Policy Responses:

Set the foundation for a better Iran policy through Congress: Several bills drafted and passed by the current Congress have made their way through the House and have important Senate companions. Three in particular would go a long way in allowing the legislative branch to re-assert its role in shaping a better Iran policy and plant it on a sustainable trajectory that allows Washington more options to deal with Iran's domestic suppression and foreign aggression. The MAHSA Act, the SHIP Act, and the Fight CRIME Act call for targeting, respectively, a) the leadership of the Islamic Republic for human rights abuses since it is that very same leadership choosing to tighten ties with Russia, b) targeting Tehran's oil revenues and those who help Iran generate them since the regime's energy earnings underwrite its destabilizing activities, and c) targeting the domestic and foreign supply chains that feed into or support Iran's missiles and drones as well as proliferate it.

Take advantage of opportunities to build multilateral pressure on Iran: Russia is increasingly poised to play the role of Iran's lawyer at the UNSC and in other international fora. This raises the importance of coordinated and multilateral action against Iran. To do so, Washington should work with the E3 (France, Germany, and the United Kingdom) to "Snapback" and restore UN sanctions on Iran before this option expires in October 2025. lxx Should this option — which was designed to legally circumvent the veto mechanism of UNSC permanent members — lapse, the West will likely not be able to use the UNSC to bring meaningful diplomatic pressure against the Islamic Republic for many years to come. While some may consider snapback escalatory, in a world where the regime in Tehran briefly enriched to over 80 percent purity last year, can produce up to 13 nuclear weapons' worth of weapons-grade uranium within five months using all of its declared uranium stockpiles, lxxi and continues to circumscribe IAEA monitoring and verification, snapback is not escalation but an attempt to achieve parity. Snapback also has the added benefit of restoring permanent international prohibitions against Iran's arms transfers and missile testing. This can impact Iranian calculations pertaining to the willingness to proliferate — and the costs that come with getting caught — as well as offer political cover to states for adhering to existing U.S. and EU drone and missile sanctions since these penalties would again have the legal, political, and normative backing of a UNSCR. Lastly, both Congress and the administration should take advantage of the fact that just six months ago, the EU and the United Kingdom retained dozens of Iranian entities active in the regime's nuclear, missile, and military programs when the JCPOA required their delisting. lxxii Washington should be sharing targeting information with trans-Atlantic partners about Iran's missile and drone procurers, **producers, and proliferators** as well as their subsidiaries, affiliates, subordinates, or newly constituted networks, many of which were designated by the United States since leaving the JCPOA in 2018.

Step up sanctions and economic pressure: Congress and the administration should consider the degree to which Russia may be exposed to existing Iran sanctions, including but not limited to terrorism sanctions, if Russian entities are liaising/coordinating with the IRGC, a designated Foreign Terrorist Organization (FTO). having They should similarly consider the applicability of existing Russia sanctions to Iranian entities. Additionally, Congress and the White House should seek to replicate the existing asset forfeiture and visa ban penalties targeting Russian oligarchs, corrupt businesses, and rights abusers in the Iran context. The administration should also be scaling up targeted sanctions on Iran and Russia using a series of executive orders that include 13949, 13382, and 14024 as well as counterterrorism (13224) and counterproliferation (13382) authorities where appropriate. Enforcement of these penalties over time will matter just as much as their levying.

Create political headaches for the Russia-Iran relationship: All trendlines indicate that despite longstanding differences, Russia and Iran are set to intensify their relationship. Washington should make it a top priority to reorient messaging from U.S.-government media to target and press upon the differences in the Russo-Iranian relationship, their history of mistrust, and Russia's predatory or neo-colonial views of Iran. The same should be consistently amplified in the U.S. government's Persian-language social media accounts, which should stress that the Islamic Republic is a poor guardian of the Iranian national interest and is willing to become

a client state to Russia and China. The greater the wave of nationalist and popular pressure on the clerical regime from below, the less room for maneuver at the top and greater obstacles to Tehran's deepening ties with Moscow. Similarly, Washington and its international partners should continue to expose all forms of Russian and Iranian malign activity and integrate it into their foreign policy messaging to include illicit arms proliferation, regional destabilization, transnational repression, cyber-enabled economic warfare, and state-sponsored hacking and espionage, just to name a few.

Interdict arms and get creative on the regulatory side: Recent news that Iranian arms exports in the Middle East were intercepted and rerouted to Ukraine^{lxxiv} is a positive step forward for the sort of creative and out-of-the-box thinking needed to check the rising Russo-Iranian partnership. Together, Congress and the administration have a shared interest in making sure that all steps are being taken to identify and disrupt Iranian weapons transfers and that there are sufficiently supportive U.S. and/or international legal predicates for these actions. This creativity will have to be applied to countering sanctions-busting networks or workarounds to arms bans that the Russians and Iranians are finding, such as in the Caspian Sea. Lxxv Congress and the administration should investigate the further applicability of section 9714 powers of the Combatting Russian Money Laundering Act to any entity engaging in money laundering to support the Russo-Iranian arms trade as well as sanction the logistics networks (planes, ships, and more) tied to this trade that may also engage in money laundering.

Make sure U.S. partners can defend themselves: There couldn't be a starker contrast between Russia's recent uptick in the use of Iranian drones^{lxxvii} and stalled debates in Washington over **supplemental funding to support Ukraine**. Besides the moral reasons, there are strategic ones why the Russo-Iranian model of war must be defeated in Ukraine. Supporting Ukraine on the battlefield will mean making sure that Kyiv has both Patriot systems to intercept potential Iranian ballistic missiles as well as sufficient ATACMs to respond to strikes.

On behalf of the Foundation for Defense of Democracies, thank you for your time, attention, and the opportunity to testify. I look forward to your questions.

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