



Iran's Global Game of Drones (& How To Stockpile While Sanctioned)

April 2, 2026

Featuring Kerri Bitsoff

Hosted by Mark Dubowitz

DUBOWITZ: As the US and Israel strike targets inside Iran, the regime is retaliating beyond its borders with drones, missiles, and proxy fire across the region. But those weapons were not built by Iran alone. They were assembled through a global procurement network that often relied on Western technology, Western suppliers, and Western blind spots in plain sight. Few people understand that network better than Kerri Bitsoff. At the Department of the Treasury's Office of Foreign Assets Control, she spent years targeting the financial and procurement pipelines behind Iran's drones, missiles, and nuclear program, disrupting the regime's ability to develop, indigenize, and source critical components. Most recently, she led efforts to expose and disrupt Tehran's military supply chain to Russia for use in the Russian invasion of Ukraine. Welcome back to *The Iran Breakdown*. I'm your host, Mark Dubowitz. So, let's break it down. Kerri, welcome to the show.

BITSOFF: Thank you. It's great to be here.

DUBOWITZ: Well, it's wonderful to have you. So, Kerri, I've heard you described as OFAC's a – secret weapon in the fight against Iranian weapons. And before we get into the substance, I want to know more about you and I'm sure our listeners are interested to know how Kerri Bitsoff decided to become a drone and missile hunter.

BITSOFF: Sure. I just left OFAC about five months ago. I started my career at the Government Accountability Office, part of the legislative branch doing investigations into different things. Which kind of naturally led me to Treasury, doing investigations into financial crime. From there on the domestic enforcement side, looking into violations of sanctions involving Iran, terrorism-related designations, the US side of the supply of critical weapons and components. From there, Miad [Maleki], who many of you know from his time at Treasury, who's of course now a senior fellow at FDD, recruited me to join the targeting and implementation side where I worked on non-proliferation and counter-terrorism programs. I had the privilege of leading a particularly impactful but behind the scenes effort to look at the financial tracking behind some of these procurement networks. It wasn't something that I had a lot of specialty in before, but I think what I liked so much about it is there was a hunt to it.

You had to really start with something and follow it. There was a lot of satisfaction in finding the actual transaction that we could hit. That's how I got started in it and then just continued from there.

DUBOWITZ: So, I want to go even further back than your US government service. Who is Kerri Bitsoff? Where are you from? How'd you grow up? How'd you get interested in national security? What led you to Washington?

BITSOFF: So, I grew up in Texas, kind of a small town. I went to Texas A&M and didn't have a great plan. I was a philosophy major – not a natural lead into national security – but what I really wanted to do is just something that mattered, something interesting, something hard. Didn't care too much about making money or anything that led me to government service. So, I got a master's degree in international affairs and moved up to DC first working for – like I said, the Government Accountability Office kind of gave me a broad view of all of the national security programs within the US government. And I was always just so drawn to what Treasury did because it was so technical and so impactful you could really see the results of the work people were doing. That's exactly what I wanted to do.

DUBOWITZ: So Kerri, give us a sense – I know a number of our listeners who've heard previous episodes with Miad Maleki, and Juan Zarate, and Matt Levitt, and a number of people who came from Treasury who've been on this podcast. But as a refresher, just give us a sense of what the Office of Foreign Assets Control does within the broader Treasury Department. And then we can – we can zero in on specifically drones and missiles.



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BITSOFF: Yeah, of course. So, Office of Foreign Assets Control is really the sanctions engine of the US Governments. These are the technical experts whenever you see a headline out there that Treasury sanctioned this person – Iran, Russia are vivid recent examples. But there's about 30 plus programs that are administered. Some make headlines more than others, but this is the office that really makes that happen. And what's missing a lot in those headlines is this is a law enforcement operation. It's a very technical process. You have to justify these sanctions. Every action comes with a lot of research, a lot of evidence. Within Treasury OFACs, the body that writes those sanctions, puts people on the list and designs the apparatus around that. So, all of the licensing, the policy matters around that to make sure that we're hitting who we want to hit, not disrupting with unintended consequences what goes on around a sanctioned party.

DUBOWITZ: Alright. So, a number of years, you're going after Iranian procurement of technologies for drones, for missiles, and then all of a sudden you see this literally – and figuratively – explode before our very eyes in the war last year, in the 12-Day War, and now in this war that began on February 28th. So Kerri, what did you bring to the fight? What were you specifically responsible for when it came to Iran's drone and missile program?

BITSOFF: So, my time in the government was years behind the scenes working to degrade what they were able to create. Iran doesn't have the ability to make a conventional high-end military. They've invested in the drone and missile program as what they can bring to the fight. That relies very heavily on parts and components from outside Iran. They just can't produce most of what goes into these programs. So, what I was working to do was disrupt those procurements, keep them from getting it, force them into lower quality substitutes, and degrade and lower the quantity and the quality of what they're able to put into these programs.

DUBOWITZ: And so, you're scanning these networks. Where did Iran want to procure from and where was it actually forced to procure from as a result of the disruption that you caused?

BITSOFF: Well, this isn't an Iran specific thing. Iran, Russia, all of these sanctioned entities, they all want to procure from the US or Germany – Western countries that make the best parts, the best components. They still try. I mean, there's no substitute for the kind of parts that are created, especially when you look at the semiconductors, the microelectronics, things that they really need to bring their weapons up to the level where they're able to meet an adversary like the US and not have the kinds of embarrassing failures like when they attacked Israel in 2024, and there were so many missiles that didn't land where they wanted them to, right? These are the sorts of parts that they really need. They are produced in such a mass scale that the leaks are there. Iran still tries to procure those. What really happened when we went after this is you'd increase the time, you'd increase the cost, and you'd increase the interdiction rates.

So, either they were forced into much lower quality parts from China. The timeline to get the part that they wanted was increased to the point where sometimes they'd have to abandon the plan or abandon the fabrication line that they were working on.

DUBOWITZ: What I find interesting is, I mean, you talked about US technology. I mean, I can understand Western European technology much more difficult for us to enforce those sanctions and disrupt those procurement networks. But how did US technology end up in Iranian weaponry? And why are US parts still inside Iranian drones and missiles? I mean, we've got this web of sanctions. Certainly, as you say, we've got these law enforcement tools where these are not just civil penalties, but criminal penalties. How are the Iranians able to procure in the United States?



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BITSOFF: This is one of the most important problems to me when I was in government. If you look at the US parts that end up, especially in Iranian drones, they show up in a lot of different contexts in Ukraine and Israel and Yemen. The parts that end up there are made from the backbone of America's semiconductor, microelectronic companies. These are some of our most important technology companies. And something like 70 or 80 percent of the foreign components in these drones end up being from US companies. We know what's happening very well. The distributor layer from these companies is like the soft underbelly of export controls. The manufacturer sells to distributors who will basically sell to anyone who walks in the door. And I can't tell you how many times we saw these exploitation reports from downed drones. We look into the chain and the information is there.

It's very clear trade data shows who these end user is ultimately going to buy from. You can map it very easily or I'd pull up the website of the end user and then there's no website. This isn't a real company, right? There's really no reason that the US companies can't do the level of due diligence to keep from basically building our adversaries weapons programs. The core of the problem is that the US companies just don't really want to know. We've seen this called out multiple times in Senate reports. The exploitation reports are very clear about what's happening. It continues to happen to this day. I mean, just last year, after years of this problem being flagged last year, down drones in Ukraine showed the exact same problem happening at the same scale.

DUBOWITZ: So, the question I have for you, Kerri, is, from an enforcement perspective, I mean, I think Treasury and OFAC have done a brilliant job over the years at really reading the Riot Act of financial institutions, right? Making it very clear to that if you're a US financial institution or you're a foreign financial institution with a relationship with a US bank and you need to trade and process and finance in the US dollar, that if you are violating our sanctions, then we're going to come down on you hard and come down on you hard with civil penalties. Major fines have been paid by banks – billions of dollars' worth – criminal prosecutions, including indictments and deferred prosecution agreements. And we've really been able to scare the bejesus out of the global financial system, not to trade with enemy states like Iran. If there's a distributor problem and it's US distributors who are turning a blind eye to the procurement of key drone and missile technology by Iran, why don't – why aren't we going after the distributors and their financial institutions with the same kinds of tools and creating that level of fear and deterrence in that marketplace?

BITSOFF: It's a great question. I think the comparison with the financial sector is very important. We have seen a very steady enforcement against the end users, the procurement agents, the middlemen and intermediaries. We've gone after them. You know, from a law enforcement – criminal perspective, we've also seen designations, but we just haven't done anything on the US side. To be clear, some of these distributors are foreign, but they have direct relationships with the US companies. And it's one of the biggest missed opportunities. We just haven't gone after US companies to try to create that same sort of pressure. You look at what they've said, you'll see a part in a down drone from Texas Instruments. They say, "Well, we stop selling to Russia. We're the victims of fraud." But there is every reason that they should know. If I can look, not with any access to any classified system or anything, if I can look and see exactly where this is going, so can they.



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It was very telling when Ukraine's Kyiv School of Economics put out a report that talked about some of this, talked about this procurement channel going straight to Russia for Russia's version of the Shahed that they're making in cooperation with Iran. They published this very telling report. Financial institutions reached out and asked for the data to try and put in their systems to try and help with their compliance, their side of it to try and not let the transactions go through. But obviously they're facilitating transactions. They're not the exporter, right? But it's very telling that these microelectronics companies didn't do the same. The financial sector has been the subject of many of these enforcement actions. They feel the pain of trying to comply with sanctions and they take it very seriously. And we just haven't had that pressure. We don't have the same sort of compliance commitment on the electronic side, even though they are directly exporting to suppliers of weapons against Ukraine and fueling wars around the world.

DUBOWITZ: Well, It's interesting, because for many years, OFAC was my favorite non-combatant command, and – but my favorite combatant command is CENTCOM, and CENTCOM is now dealing with the problems of Iranian missiles and Iranian drones, right? And I think in many respects, the president has been very clear that the United States and Israel went to war with Iran on February 28th because we wanted to destroy Iran's missile program, and its drone program, and its Navy, and really defang the war making capabilities of the Islamic Republic of Iran. Now that I think the United States and Israeli Air Forces have done a pretty good job of doing that, there's going to be the reconstitution problem. When major military operations are over, there's no doubt that Iran will try to reconstitute with the help of Russia and of China. But if we are not going to be cracking down on the flow of Western technology to help Iran reconstitute, then all of this has been for nothing.

So, what would you, you know – you're no longer at OFAC, but if you had sort of a magic wand and you could have any kind of wish about what OFAC would do differently in preventing Iranian reconstitution, what would that be?

BITSOFF: So, two things. I think that an investigation and an enforcement action against the kinds of things we're talking about, against suppliers that provide all the critical tech. I mean, again, 70 to 80 percent of these drones, the foreign components, which is the majority, are made from US parts. And I think we've seen, especially in the Ukraine context, which has just been a pressure cooker of drone warfare that really shows all of the vulnerabilities of these weapons as you've tried to produce them quickly and at scale, the degraded parts from China, from Russia make all the difference in the actual war fighting. The original engine, the Shahed variant in Russia was based on, has hundreds of hours of operating time. The Iranian knockoff has maybe 20 hours. The Russian version and the Chinese version are a couple hours. It's a very significant difference in what can be done.

And so, by putting that compliance pressure on US companies to really pay attention to where this is going, that's going to make a huge difference. Even if they can reconstitute, we can see what's happening today, how important it is to have lower quality weapons. They're easier to defend against, they're easy to exploit, they're easier to counter, and that makes a really big difference. But on the other side, I think something that gets lost a little when you look at sanctions – there's really two kinds. There's the big, splashy strategic sanctions that, you know, are very important, but they can kind of crowd out what sanctions are really, really good at, which is the day-to-day grind against some of these problems like proliferation and counterterrorism. This is the bread and butter of sanctions to go after these low-level actors actually stop things from happening, but that requires a steady drum beat, things that don't grab headlines the way some of these other things do.



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And the problem is these two kinds of actions – these big 300 target actions after the invasion of Ukraine, the Chinese teapot refineries, both very important – they happen in the same office where we're going after the procurement agents, the middlemen, the terrorist financiers at a very low level where it actually stops something from happening. When that happens in the same office, number of actions is seen as overuse of the tool. And that's really the wrong framing. Separating that out and allowing the resources that you have committed to these problems to continue to work and go after these in a very meaningful, steady way would make a big difference in keeping up the enforcement pressure.

DUBOWITZ: Well, I mean, the Chinese have this phrase, you got to kill a chicken to scare the monkeys, right? And this sort of idea that you've got to select a target and make an example of that target. And then in the case of the financial institutions, you know, dating back to 9/11, I think Treasury and OFAC did a very good job of identifying financial institutions that were engaged in money laundering and proliferation sensitive financing. And we're helping bad actors, both non-state actors and state actors, evade our sanctions. And then they made an example of them. They went after them and they worked very closely with the Department of Justice and with AUSAs [Offices of the United States Attorneys] and Southern District and elsewhere and criminal prosecutions, people went to jail. I mean, that's how you wake up in an industry. And I mean, I just wonder, Kerri, is there an opportunity to choose a couple of really egregious violators who are providing key technology?

And again, let's frame this in very stark terms. I mean, these are American companies selling American technology to our adversaries to kill Americans. And if you kill Americans, you should not be in business and you should be in jail. So why is everybody – is it lack of political will? Has there been a lack of big enough targets that OFAC identified? Why have we not put some of these distributors in jail? Because that would seem to me, that would scare the monkeys. That would scare other distributors to realize that if I'm going to actually do business with an enemy state and they're going to use my technology to kill Americans, I could end up not only losing my business, but I could end up in prison.

BITSOFF: Yeah. I mean, it's an interesting question. I thought about it a lot. This was sort of a pet project of mine when I was in the government. And what I've come to believe is we have continued to do what we're comfortable with. We have designated the procurement agents. We've indicted some of these intermediaries that are very far removed from the US side. The reality is, this isn't a country problem, it's a functional problem. Terrorist financing, narcotics trafficking, this is a functional problem. It's a very broad, widespread issue. In those cases, we don't think about it like a campaign. And that's what we have to be doing. We have to have a strategy that goes beyond the whack-a-mole one-offs to go after some of these particularly bad actors. It's a departure from what we're used to, and we have very limited capacity in some of these agencies because it's not thought of as a campaign, because it's not, you know, part of a bigger strategy.

It just hasn't gone up the priority level to the point where this is a coordinated interagency action to be pushed out the door. That's really what I think it is.

DUBOWITZ: Well, I would say that now that you're on the outside and you've left government, I don't know what you're up to now, but there's real opportunities to lead these campaigns from outside the US government. I mean, I think at FDD, we've led a 23-year campaign to try and put pressure, but also to help the US government identify, and target, and ultimately enforce sanctions and prosecutions against bad actors. So, you know, sometimes it takes people from the outside to really encourage people on the inside to prioritize things, to make these enforcement actions. Because otherwise, as you said, it's a perfect phrase, it's a game of whack-a-mole. And, you know, you designate one agent, they move over to another agent. You designate one distributor, they move over to another distributor, and you always lose games of whack-a-mole. The only way to win a game of whack-a-mole is to put some of the moles in prison and make sure that the rest of them understand that there's a real severe price.



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And I want to get to this next part of the conversation, Kerri, because it's not just in Iran, it's not just in the Gulf, right? It's not just in Ukraine and the threat to Eastern Europe, but it's in our own hemisphere, in the Western hemisphere in places like Venezuela. Do you want to talk a little bit about what you've seen in Venezuela and the connections to bad actors?

BITSOFF: Yeah. And, you know, before I get there, I can say this now that I'm outside the government. As a longtime consumer of FDD's report – these reports, these tips, these leads have been incredibly helpful to push some of this forward. And I don't think we would be where we are now without some of that. So, I'm very grateful to everything you're doing. But on the other question, I mean, it's not talked about enough, but Iran's playbook with its proxies, what we've seen in Russia, you know – it's bringing the fight to its regional adversaries, it's bringing the fight to Europe and Russia, but it's doing the same thing all over the world. This is a global playbook. It has certain advantages. It has its drone program. It has its missile program. And we've seen over and over again that it conducts outreach to set up partnerships with countries that can use these kinds of asymmetric weapons, but this is not a defense export program.

This is an influence operation. The money isn't significant, but the leverage is incredibly important for Iran. That kind of partnership creates an opening for them. In Venezuela, it's been building drone infrastructure for two decades? They moved in, they set up bicycle factories, tractor factories, but of course that's not what they were building. These were IRGC members in Venezuela on military bases building drones. They're trying to build their own version of the Shahed, a range of 1,000 or 1,500 miles that puts them in Florida. It's not just Venezuela. We saw a backup created in Bolivia. We saw them attempt to do the same thing in Brazil. They were in Brazil trying to pitch the same kind of combat drone at a defense expo. This is when I was in government, we knew there would be talks between the governments there. Sanctions aren't always available as a tool.

We couldn't sanction anything. It was just talks and maybe that's not the right tool to use at the time. So, we had to get Miad to get on a plane to go talk to the Brazilian government to warn them about what would happen. And, you know, this is a case where sometimes the threat of sanctions can be more impactful than the actual sanction itself to try and cut off that partnership before it happened. But, you know, that's sort of a case where, you know, paying attention to what Iran is doing is so important, especially so close to home. Of course, this is much broader than just Western hemisphere. This is a playbook they've gone to over and over again around the world.

DUBOWITZ: Yeah. I mean, we've seen drone production facilities now set up in Russia – Iranian Shahed drone production in Russia, as you say in Venezuela, attempts to set this up elsewhere in the Western hemisphere. It's become a source of not just hard currency, but a source of, as you say, of influence. And I mean, I think you sense the frustration in my voice because I feel like we've got to figure out ways to really crack down on this. It's remarkable to me that US companies selling US technology to the Iranians to help kill Americans. That is just – it should be unacceptable. It should be a red line. And we should be using all instruments of American power against those who are feeding this critical technology to our enemies, which actually, I mean, it does sort of open up the question of if sanctions are not the tool, maybe criminal prosecutions are? That's certainly how we've gone after narco-terrorists and that – those have been quite effective.

What's your sense from a OFAC perspective of tariffs as an instrument of economic warfare? I mean, was that something that was used by the Trump administration, specifically, to go after bad actors or is it really just tariffs as an instrument of trade policy?



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BITSOFF: It's an interesting question. I mean, it's certainly an instrument of trade policy that was brought into a very different end game. If you look at how the tariffs have been used and then how the sanctions have been used in the same context, Indian buyers of petroleum, Turkish buyers of petrochemicals, these sorts of cases – this is a sanctions playbook. You go after these intermediaries in third countries where sanctions have a bite because they're connected to the international financial system, but you're going after individual private entities. It's difficult to force a change that way on a countrywide scale, which is really what the sanctions are supposed to do and what they want to do. Bringing the tariffs in is to try and put that pressure on the government to change the behavior, to do whatever they need to do to force their private industry to make that change.

Sanctions used in the same context where tariffs are used are going after individual actors in the private market. It's very difficult to force a countrywide change using that method if the government isn't on board – to look at US government outreach to some of these countries like the UAE, like India, like Turkey that are playing this intermediary role in sanctions of Asian. We get very different reactions. We've tried engaging with Turkey for many years and it's been met with, "We don't believe in the sanctions program, we're not going to enforce it." And the UAE, you know, has a slightly different take depending on exactly what you're talking about. But, in general, we've seen somewhat minimal enforcement. And tariffs, as a tool, really changes that conversation because it necessarily involves the government. So, it'll be interesting to see how that plays out over the long run.

DUBOWITZ: Yeah. I mean, the president threatened to impose 25 percent tariffs on any country doing business with Iran. So, it's sort of interesting to see if he's going to use that tool. You mentioned that the Emiratis, the Turks, obviously there's been problems with the Omanis, other Gulf States, the Kuwaitis. Interesting because they're all currently under drone and missile fire from Iran. I guess it's that old expression that nothing focuses the mind like the knowledge that you're going to be hanged at dawn. Well, maybe nothing focuses the mind, like the knowledge that you're going to be droned at dawn. And certainly, that's what's been happening. We're finally seeing the Emirates in particular cracking down on massive Iranian sanctions of Asian. It's long time coming, I think, as you said. Do you think that the Iranian threat to the Gulf – do you think the Russian threat to Europe is going to change and strengthen the political will of these countries to finally crack down on these networks, or am I hoping for too much?

BITSOFF: I absolutely do. I think we already see it. I think Iran did to itself what we couldn't do for many years, which is to really remind these countries that Iran posed a threat. And, you know, I think Iran's calculation was these countries have tried to hold the US back from pressuring Iran for many years and maybe would do the same if they reminded them of the threat. It just had the exact opposite effect. They reminded the Gulf that they were a threat, and now these countries are thinking, "Well, maybe we don't want to deal with this." I think they will be a lot more willing to work with the US in these efforts going forward.

DUBOWITZ: Yeah. So, Kerri, I want to end on this. I think I mentioned to you that OFAC was my favorite non-combatant command for many years, and CENTCOM is my favorite combatant command, but, you know, we're going to move beyond major military operations and we're going to be back to OFAC. And we're going to be back to what the US government can do in order to ensure that Iran doesn't reconstitute these deadly capabilities that our brave men and women and the brave Israelis have spent now much time trying to degrade and destroy. What's your advice to your former colleagues at OFAC? What are the – if you were back in Treasury today, what would you prioritize first? What's the highest, kind of, leverage pressure points? And, you know, can we still meaningfully degrade this network going forward?



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BITSOFF: Yeah, I think the military operation has given us an incredible head start for what we want to do on the – on the sanction side to prevent reconstitution. I mean, in the past, we've seen a very impressive commitment to reconstituting very quickly. I mean, these programs are hardened and entrenched and have redundancies and have proven very resilient. I think the military operation has taken a lot of that out, but Iran does still have its procurement network, the shadow banking system, the procurement agents. These all still exist outside Iran. They will be used. I think there's a couple things we could do. We must try to crack down on the US side of this problem, the European side of this problem. Both can be affected by sanctions. Enforcement actions can have impact, but we must have a steady consistent posture on going after these and not treat that kind of sanctions campaign as a side note to some of these larger programs.

In the same vein, make a campaign out of keeping Iran from indigenizing some of the things it really focuses on. We did have some success, especially on the carbon fiber side. Some of these things that Iran really needs that are very difficult to import. They're heavily controlled, they're clunky, they're obvious when you import them, and they're real choke points, like very real choke points for reconstituting, for scaling up, for making these drones and missiles in the kind of volume they need. So that's why Iran tries to bring them inside and indigenize that capability. We have to go after the component parts of those programs to keep Iran from doing that, putting that outside the reach of what sanctions, what the international community can do.

DUBOWITZ: Yeah, you're right. We've got a good headstart. Sounds like the US and Israeli Air Forces have destroyed a lot of the defense industrial base that Iran has built. A lot of these companies that really supported Iran's missile and drone efforts. And so, hopefully starting with more of a blank slate and hopefully with a US government that is prepared to really crack down, kill the chickens, and scare the monkeys. We can build on your great work, Kerri. So, Kerri, listen, thank you for being on the podcast. Thank you for your service to our country. We're always grateful to hear when young people decide to leave college and go commit themselves to the defense of our country. So, thank you for that and look forward to having you back.

BITSOFF: Thank you, Mark.

DUBOWITZ: My thanks to Kerri for giving us a window into how disrupting Iran's weapons networks actually works. Not in theory, but in practice. The picture is clear. Iran didn't just survive sanctions, it adapted to them, scaled, and built a system around evading them. And Iran's even exporting this model across the Middle East, to Russia and the battlefield in Ukraine, and now even closer to home in Venezuela and South America. A system that now powers wars across continents. So, the question isn't whether we understand the threat, it's whether we're prepared to go after the system that makes it possible and shut it down for good. Our guest today helped write the playbook, after all. I'm Mark Dubowitz. This has been *The Iran Breakdown*. Until next time, when we break it down again.