Congress of the United States
Washington, DC 20515

February 5, 2024

The Honorable Merrick B. Garland
Attorney General
U.S. Department of Justice
950 Pennsylvania Avenue NW
Washington, DC 20530

Dear Attorney General Garland,

We write to urge you to investigate the International Crisis Group for potential violations of the Foreign Agents Registration Act (FARA), given recent revelations of its members' activities and the groups' longstanding secret relationship with the government of the Islamic Republic of Iran.

FARA requires all individuals in the United States acting as agents of foreign principals to regularly disclose their status and activities as a foreign agent to the Department of Justice. FARA is meant to protect U.S. national security by preventing organizations operating in the United States from secretly serving the interests of a foreign power and to provide transparency to reduce foreign agents' ability to credibly promote propaganda from hostile governments.

The International Crisis Group ("Crisis Group") is a think tank headquartered in Belgium with a substantial presence in the United States. While the Crisis Group ostensibly conducts research on conflict resolution, recent reporting has revealed that the group has a disturbing and longstanding official relationship with the government of Iran. On February 2, 2024, *Semafor* reported that the Crisis Group established a formal Memorandum of Understanding (MOU) in 2016 with the in-house think tank of the foreign ministry of Iran, the Institute for Political and International Studies (IPIS), which is notorious for its promotion of Holocaust denial. The Crisis Group failed to disclose this cooperation agreement at any point in the past eight years.

In addition to the Crisis Group's official relationship with the Iranian government, the group and many of its most prominent members have a documented history of acting on behalf of the government of Iran. In 2021, former Iranian Foreign Minister Mohammad Zarif described how in 2014 he took steps to "ensure" that the Crisis Group would be "publicizing and lobbying" for an Iranian diplomatic proposal to shorten the time it would take Iran to develop a nuclear weapon. The Crisis Group also has employed and continues to keep on its payroll members of an Iranian government influence operation, the "Iran Experts Initiative," such as Ali Vaez, Dina Esfandiary, and Ariane Tabatabai. In 2014, Vaez pledged to Zarif that it was his "patriotic duty" to help Zarif publicly oppose a U.S. negotiating position that Iran wanted to undermine. Despite the September 2023 revelation of this pledge of loyalty to an Iranian government official, Vaez remains the Director of the Crisis Group's Iran Project. Vaez also was a close advisor and

associate of Robert Malley, himself a former president of the Crisis Group, before Malley was suspended from his position as the Biden administration's Special Envoy for Iran.

The Crisis Group's actions clearly represent potential violations of FARA and merit a full investigation. Iranian government officials believe that the Crisis Group lobbied on its behalf in public and before officials of the United States, and the group has refused to disclose an official relationship with Iran's Foreign Ministry. Crisis Group members willfully took part in Iranian influence operations, and the recent Crisis Group president had his security clearance revoked, reportedly for disqualifying personal conduct and mishandling classified information.

There is a clear pattern of behavior indicating that the Crisis Group is in fact not an independent organization, but a chief mouthpiece of the Islamic Republic of Iran in the United States. Given this evidence, we urge you to launch an investigation of the Crisis Group without delay for potential FARA violations to protect our nation from malign foreign influence.

Thank you for considering this important matter. We look forward to your response.

Sincerely,

Jim Banks
Member of Congress

Elise Stefanik
Member of Congress

Mike Waltz
Member of Congress