

Congress of the United States
Washington, DC 20515

August 1, 2024

Janet Yellen
Secretary of the Treasury
1500 Pennsylvania Avenue, NW
Washington, D.C. 20220

Merrick Garland
Attorney General
1600 Pennsylvania Avenue, NW
Washington, D.C. 20500

Avril Haines
Director of National Intelligence
1500 Tysons McLean Dr.
McLean, VA 22102

Dear Secretary Yellen, Attorney General Garland, and Director Haines,

We write today regarding recent revelations that certain anti-Israel organizations in the United States have received funding from the Iranian regime, which may constitute multiple violations of U.S. law and regulations. As such, we urge the Department of the Treasury to investigate and impose monetary penalties on any U.S. persons involved in these transactions and to sanction those individuals and entities that provided this funding. We also call on the Department of Justice (DOJ) to criminally prosecute and pursue civil forfeiture actions against any individual or entity that violates the law by receiving funding from the Iranian regime. Lastly, we also urge the Office of the Director of National Intelligence (ODNI) and Treasury to make public all available information, without compromising sources and methods, regarding Iran's funding of these pro-Hamas organizations so that the American people can see who these groups truly are.

Director Haines' statement earlier this month confirming that the Iranian regime, a state sponsor of terrorism (SSOT), provided financial support to pro-Palestinian protests in the United States suggests that these groups may be in violation of U.S. law. It is illegal for any bank or individual to conduct financial transactions with SSOTs. Any U.S. person that engages in a financial transaction with an SSOT despite "knowing or having reasonable cause to know" that a country is an SSOT faces up to ten years in prison.

Since multiple Iranian government entities have also been sanctioned for their terrorist activities, any transaction in which these entities sent funding to U.S. groups likely ran afoul of one or several of these sanctions. The Islamic Revolutionary Guard Corps (IRGC) is a Foreign Terrorist Organization (FTO), a designation which allows U.S. banks to block its assets and prosecute or impose civil penalties on any U.S. person who provides material support other FTOs like it. Similarly, multiple Iranian entities, like the Central Bank of Iran, are Specially Designated Global Terrorists (SDGT), which enables the U.S. to target terrorist financiers who access the U.S. financial system. Under the DOJ's enforcement of the International Emergency Economic Powers Act, any person who "willfully" provides or conspires to provide material

support to an SDGT can face up to 20 years in prison and will likely be required to forfeit “tainted” property tied to that transaction. Finally, Treasury retains civil enforcement authority that applies on a strict liability basis, empowering Treasury to impose civil penalties on entities engaged in prohibited conduct, even if there is no evidence of negligence or intent.

Given that the aforementioned funding almost certainly violates the U.S. anti-terrorism statutes noted above, we call on you to aggressively prosecute any violations by U.S. individuals and entities of these laws, to impose civil penalties on any violators, and to sanction those entities which provided this funding or facilitated these transactions.

Additionally, we are concerned by ODNI’s claim that “Americans who are being targeted by this Iranian campaign may not be aware that they are interacting with or receiving support from a foreign government.” If U.S. organizations are receiving funding from SSOTs, the United States government has a duty to inform the public and to warn all protestors involved with these groups that they are acting at the behest of a terrorist state. The American public should not be left in the dark, and it is critical that neither ODNI nor Treasury withhold information that would reveal the depth of this Iranian influence operation.

With these concerns in mind, we request that your departments and offices provide me with answers to the following questions by no later than August 22, 2024:

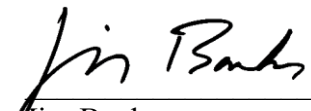
1. Which specific individuals and entities have received financial assistance, directly or indirectly, from the Government of Iran or any entities that are agents or affiliates of the Iranian regime?
2. Have any of these groups been notified of the Iranian origin of their funding?
 - a. If so, which organizations have been notified?
 - b. What due diligence measures do the individuals or entities that have received this funding have in place to guard against such illicit actors?
 - c. Have any such organizations volunteered to give up this funding or made any indication that they would reject such funding in the future?
3. What is the estimated total amount of financial support provided by Iran to these groups, and how long has this financial support been occurring?
4. Does ODNI or the FBI have evidence to suggest that any of these anti-Israel groups knew or should have known that they were receiving support from an SSOT or FTO?
 - a. Has the Treasury Department notified any financial institutions that their institutions were used to process illicit payments?
 - b. Were any transactions identified and blocked by Treasury?
5. Has the Treasury Department received any suspicious activity reports (SARs) from banks about these transactions? If so, please transmit copies of any SARs to the Congress.
6. Does the DOJ consider these groups’ receipt of Iranian funding to be violations of U.S. law? Will the Treasury Department consider the receipt of Iranian funding “egregious”

violations of prohibited conduct and impose severe monetary penalties under a strict liability standard to individuals or entities that received such funding?

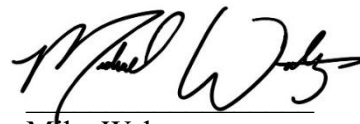
7. Will ODNI and the Treasury commit to make public more information regarding this Iranian funding of U.S. protest groups?
8. What actions are being taken to prevent further efforts by SSOTs and FTOs to fund U.S. individuals and entities associated with anti-Israel protest movements?

Thank you for your attention to this matter. We look forward to your responses.

Sincerely,



Jim Banks
Member of Congress



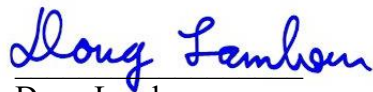
Mike Waltz
Member of Congress



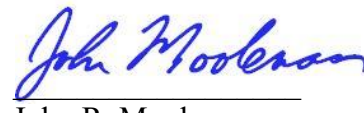
Jared Moskowitz
Member of Congress



Robert J. Wittman
Member of Congress



Doug Lamborn
Member of Congress



John R. Moolenaar
Member of Congress



Jen Kiggans
Member of Congress



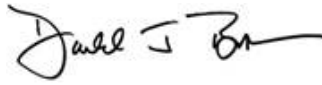
Pat Fallon
Member of Congress



Nick LaLota
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Trent Kelly
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Don Bacon
Member of Congress



Michael Rulli
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Burgess Owens
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Lance Gooden
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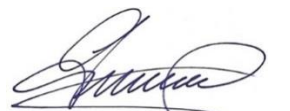
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Member of Congress



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Member of Congress



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Member of Congress



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