

**A RETURN TO MAXIMUM PRESSURE: COMPREHEN-
SIVELY COUNTERING THE IRANIAN REGIME'S
MALIGN ACTIVITIES REGIME'S MALIGN ACTIVI-
TIES**

HEARING
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C O N T E N T S

REPRESENTATIVES

Opening Statement of Chairman Brian Mast	Page 1
Opening Statement of Subcommittee Chairman Michael Lawler	2
Opening Statement of Ranking Member Gregory W. Meeks	3

WITNESSES

Statement of Norman T. Roule, Non-Resident Senior Advisor, Warfare, Irregular Threats, and Terrorism Program, The Center For Strategic and International Studies	5
Prepared Statement	8
Statement of Claire Jungman, Chief of Staff, United Against Nuclear Iran	15
Prepared Statement	17
Statement of Dana Stroul, Director of Research and Shelly and Michael Kassen Senior Fellow, The Washington Institute For Near East Policy	29
Prepared Statement	31

APPENDIX

Hearing Notice	76
Hearing Minutes	78
Hearing Attendance	79

A RETURN TO MAXIMUM PRESSURE: COMPREHENSIVELY COUNTERING THE IRANIAN REGIME'S MALIGN ACTIVITIES REGIME'S MALIGN ACTIVITIES

Tuesday, April 1, 2025

HOUSE OF REPRESENTATIVES,
COMMITTEE ON FOREIGN AFFAIRS,
Washington, DC.

The committee met, pursuant to notice, at 2:33 p.m., in room 2172, Rayburn House Office Building, Hon. Brian Mastchairman of the committee) presiding.

Chairman MAST. The Committee on Foreign Affairs will come to order.

I ask everybody to rise and join me in reciting the Pledge of Allegiance.

All. I pledge allegiance to the Flag of the United States of America, and to the Republic for which it stands, one Nation, under God, indivisible, with liberty and justice for all.

OPENING STATEMENT OF CHAIRMAN BRIAN MAST

Chairman MAST. As we open this hearing to outline maximum pressure on Iran, I'm going to deliver just a short message before I pass this gavel off to Mr. Lawler, who will actually be chairing this hearing, as he has a keen interest in the issues, as all of us do, and a firm knowledge in everything that we are about to discuss. And because I stole this hearing from him—he was going to do it at the subcommittee level—I thought it would only be right that he chair this committee. So, he will be doing that.

But the message that I wish to deliver is this, and it is simply to Ayatollah Khamenei, and I would deliver this to you: President Trump will work with you to peacefully end your nuclear weapons and ballistic missile program or President Trump will destroy your nuclear weapons and ballistic missile program. You get to choose the remedy, Ayatollah.

I now pass the gavel to Mr. Lawler.

Mr. LAWLER. [Presiding.] Thank you, Mr. Chairman.

The purpose of this hearing is to explore policy options to effectively curtail Iran's illicit revenue streams and address the nexus with Iran's malign activities, particularly relating to its sponsorship of terror proxies and the nuclear weapons program.

I now recognize myself for an opening statement.

**OPENING STATEMENT OF SUBCOMMITTEE CHAIRMAN
MICHAEL LAWLER**

Mr. LAWLER. Good afternoon.

And again, thank you, Chairman Mast, for putting on this hearing, and to Ranking Member Meeks, for presiding today.

I also want to thank our witnesses for their expertise and their attention to this pressing matter.

When President Trump left office over 4 years ago, the Iranian regime and its terror proxies were on their heels. The Trump administration's maximum pressure policy had devastated Iran's economy and denied the regime access to critical resources.

Diplomatically, Iran was cornered and isolated like never before. The Abraham Accords saw Israel normalize relations with three Arab nations. It was a direct blow to Iran's influence and put the Middle East on a path toward unity against Tehran's aggression.

Militarily, the message was unmistakable: the United States would not flinch. The decisive strike that took out Soleimani, Iran's mastermind of its terror proxies, crushed Iran's confidence and deterred provocations.

By 2021, the Middle East stood on the brink of a new era of peace and stability. Iran was contained, its proxies weakened, and the region almost freed from the looming threat of Iranian terror.

Enter Joe Biden. President Biden desperately tried to revive a dead nuclear deal with Iran. Even as the regime continued to expand its nuclear program in violation of its non-proliferation-treaty-related obligations, the Biden administration pursued deals that would have provided the regime with sanctions relief, while also allowing it to continue to expand its enrichment capabilities, including with support from Russia.

And when the Biden administration came up short on a nuclear deal, it pursued a misguided \$6 billion giveaway to Iran. And less than 2 months later, Hamas, with support from Iran, launched the heinous October 7th terrorist attack on Israel.

Under the last administration, we occasionally heard tough language, but that was rarely backed-up with concrete action. This lack of resolve emboldened Iran and its proxies, offering them a free hand to escalate attacks against the United States and its partners and allies—with few, if any, consequences.

Under the Biden administration, Iran, China, and Russia joined forces to form an unholy alliance aimed at destabilizing the free world. Yet, even as Iranian missiles and drones were targeting Israel, fueling Putin's illegal war of aggression against Ukraine, and being used to threaten U.S. service members, the Biden administration did little to prevent the lapse of the U.N.'s missile embargo on Iran in October 2023. As a result, Iran now has a free hand to proliferate its missiles and long-range drones unchecked.

Joe Biden's foreign policy decisions in the Middle East were ill-conceived, disorganized, and at times fatal, including for U.S. service members, as we tragically saw at Tower 22 in Jordan. And in the end, he left the world more volatile and less safe than he found it.

It is clear that the Biden administration's blatant refusal to enforce sanctions against Iran contributed to instability across the region and the globe. Under his administration, we witnessed an un-

precedented trade in illicit oil between Iran and China, opening a lifeline for the IRGC to fund its malign activities.

It didn't work. Appeasing terrorists does not work. And that is why I'm pleased that President Trump has since put U.S. policy toward Iran back on track—restoring the much-needed and most effective maximum pressure campaign.

Since taking office just over 2 months ago, the Trump administration has made great strides to implement an aggressive and comprehensive Iran policy that restores much-needed deterrence. This is a welcome change from the days of handwringing we saw under President Biden, whose policy toward Iran was all carrots and no sticks.

The strategy now is to execute the maximum pressure campaign and deny the regime every ounce of grace given to them by the Biden administration. As part of this strategy, we must clamp down on the Iranian oil trade. Last year, Iran made over \$50 billion from its illicit oil trade, much of which is controlled by its Revolutionary Guard Corps.

As part of the maximum pressure, we must fully enforce existing sanctions to stop this illicit oil trade, specifically, cutting off Iran's oil trade with China, which accounts for, roughly, 90 percent of oil exports.

We must also take all available steps to stop Iran from ever obtaining a nuclear weapon. A nuclear Iran is not an option, and the safety of the American people and everything we love is dependent on our success here. One way or another, Iran's nuclear ambitions are finished. And once Iran loses hope for nuclear capacity and we have decimated their bank accounts with the halt of the oil trade, they won't be able to fund terror proxies any longer.

President Trump's support for Israel and the war against Iran-backed terror is absolute, and I hope to see other partners in the region step up their commitment to working with the United States and Israel to address this shared threat, to ensure Iran no longer threatens our security or that of the free world.

As this hearing will demonstrate, there are a number of measures that can and should be taken, and I look forward to exploring that with our witnesses today and seeing the path forward.

I now recognize Ranking Member Meeks for his opening remarks.

OPENING STATEMENT OF RANKING MEMBER GREGORY MEEKS

Mr. MEEKS. Thank you, Mr. Lawler, and I want to thank Chairman Mast for calling this timely hearing.

Thank you to all of our witnesses for joining us this afternoon.

There is strong bipartisan understanding on this committee regarding the threat posed by the government of Iran, the world's foremost State sponsor of terrorism, and how it threatens the United States, Israel, the broader Middle East, and the entire globe.

With our quality panel, I know we will leave this hearing better informed on various aspects of the Iranian threat—ranging from its illicit nuclear program to support of terrorist proxies.

We are living in a dangerous time when it comes to Iran. Over the last year, we have seen Iranian proxies attempt to destroy Israel. Hundreds of ballistic missiles and drones launched by Iran threatened Israelis and Palestinians alike.

The United States Armed Forces have been targeted in hundreds of Iranian-sponsored attacks. An Iranian proxy has crippled shipping through the Red Sea and directly targeted the U.S. Navy in international waters.

Iranian drones are aiding Vladimir Putin in his illegal and brutal war on Ukraine, and China continues to purchase Iranian oil in the face of U.S. sanctions.

We know, based upon public reports, though, that Iran is now closer than ever to having a nuclear weapons capability. Now, during the time of the JCPOA agreement, Iran was verifiably at least a year away from having enough highly enriched uranium for a single bomb. But, as a result of the Trump administration, because he was the President before Biden, as a result of him abandoning that agreement, Iran is now only days away from having enough highly enriched uranium for many bombs. By every measure, we are less safe today because we left the JCPOA than we were while we were in that agreement.

We are now reading press reports that Prime Minister Netanyahu is planning a potential military strike on Iranian nuclear infrastructure as soon as this month. And reporting indicates that Mr. Netanyahu is aggressively lobbying President Trump to support such a strike.

A military strike on Iran is no easy task, not a sure thing, and comes with significant risk of escalating into a destructive regional conflict. It is unlikely to deter Iran's nuclear weapons aspirations for a significant period of time and could have enormous impact on regional security, as well as the United States and global economies.

You may have noticed that the U.S. economy is already facing troubling volatility, as a result of the President's reckless threats of tariffs. Rattling energy markets, disturbing trade routes, and unleashing additional regional instability is not something to be taken lightly.

So, no military solution will permanently deny Iran the bomb, nor will it usher in a democratic Iranian government. That's pure fantasy.

Like most observers of Iran, I'm acutely certain both the Iranian and American people would be better served by Iranian leadership who respect human rights at home and peace abroad. I hope we can protect foreign assistance efforts that support the Iranian people from further arbitrary cuts.

We know Iranians do not broadly support their corrupt theocratic government that abuses women and minorities and wastes Iran's financial resources supporting terrorists that undermine their own security and bring no benefit to the Iranian people.

Despite all these serious challenges, solutions are not impossible. I would always argue that diplomacy must always be kept on the table alongside credible threats. Diplomacy may not solve all of our challenge with Iran, but direct engagement with Iran has proven

successful in lowering tensions and addressing the nuclear program—the main issue of concern.

President Trump was right to send a letter to Iranian leaders opening the door to diplomatic engagement. We must encourage this effort and utilize all means of American power to address Iranian threats and to do so in lockstep with our allies. We should be involving our allies and bringing them in closer for this effort, not push them away.

We have three excellent witnesses with us today to help think through the challenges before us. This is an excellent panel to assess the threats posed by Iran and help us formulate appropriate responses to keep the United States and our friends and allies safe.

So, I thank you, Mr. Chairman, and I yield back.

Mr. LAWLER. Thank you, Ranking Members Meeks.

Other members of the committee are reminded that opening statements may be submitted for the record.

[No statements have been submitted.]

Mr. LAWLER. We are pleased to have a distinguished panel of witnesses before us today on this important topic.

Mr. Norman T. Roule, non-resident senior advisor, Warfare, Irregular Threats, and Terrorism Program, The Center for Strategic and International Studies.

Ms. Claire Jungman, chief of staff, United Against Nuclear Iran.

And Ms. Dana Stroul, director of research and Shelly and Michael Kassen Senior Fellow, The Washington Institute for Near East Policy.

This committee recognizes the importance of the issues before us and is grateful to have you here to speak with us today.

Your full statements will be made part of the record, and I will ask each of you to keep your spoken remarks to 5 minutes in order to allow more time for member questions.

I now recognize Mr. Roule for his opening statement.

STATEMENT OF NORMAN T. ROULE

Mr. ROULE. Chair Lawler, Ranking Member Meeks, and distinguished members of the committee, thank you for the opportunity to appear today. I will make brief comments, and with your concurrence, submit a statement for the record.

For over two decades, Iran has used its nuclear program and regional militias as its primary tools of power projection. Tehran's role in the death of hundreds of Americans and tens of thousands of citizens in the Middle East is routinely acknowledged. Iran's missiles and drones kill Ukrainians and threaten global shipping in the Red Sea.

But it has evaded meaningful consequences, in part, due to Western concerns that it would respond to significant retaliation by undertaking the final steps to acquire a nuclear weapon. These aggressive policies gradually have become entwined as Iran's malign sword and shield of its foreign policy. Recent seismic changes in the region give us an unprecedented opportunity to deal with these challenges.

Despite the intelligence community's assessment that Iran is not undertaking nuclear weaponization, recent reports by the International Atomic Energy Agency are alarming. Tehran has built a

nuclear program which has no justifiable civilian purpose. Iran now appears capable of producing its first quantity of 90 percent enriched uranium, sufficient for one nuclear weapon, in about a week. Tehran's current stockpile of 60 percent enriched uranium is sufficient for about seven nuclear weapons. Assuming use of Iran's entire stock of enriched uranium and centrifuge capacity, some experts believe Iran could produce fissile material sufficient for approximately 10 nuclear weapons in a month. Let those numbers sink in.

Tehran has also increased the number and sophistication of its centrifuge cascades, allowing for rapid weaponization when it so chooses. Iran routinely hampers IAEA efforts to verify its nuclear program, which, absence solid intelligence, reduces confidence in detecting any diversion of nuclear material or equipment to any possible covert weapons program.

In short, Iran looks like a country building a nuclear weapons program, albeit one yet to make the final steps required, because it either fears discovery and the subsequent military consequences or believes its current approach offers diplomatic advantages beyond those found in possession of an actual nuclear weapon. Its long-range ballistic missile program appears to be following a similar path.

Turning to Tehran's proxy network, Israeli and ongoing U.S. military actions have severely weakened its proxies in Lebanon, Gaza, Syria, and Yemen, but these groups survive along with its other partners in the region. The Islamic Revolutionary Guard Corps Quds Force aims to revive these groups, including in the Red Sea region, where its strategy involves securing naval access via Sudan, where it likely hopes to establish weapons transshipment and militant training centers in East Africa to threaten the Arabian Peninsula, Israel, and the Eastern Mediterranean.

Iran's proxy operations remain vulnerable, however, to pressure on their logistics, finances, and personnel. Diplomatic and economic sanctions are important, although Europe's actions here have been insufficient. The United States needs to make it clear to Iran that, if the Quds Force operates as a terrorist organization, its personnel and logistics will be targeted accordingly, including by our military assets. Yemen presents an opportunity to demonstrate this decision.

Tehran recognizes its unprecedented vulnerability to external military threats, particularly after Israel's October 2024 strikes demonstrated the ineffectiveness of their air defenses. The Israeli strikes and Iran's failed counterattacks also show the potency of U.S. military technology and our regional partnerships.

Domestically, Iran faces severe economic and political challenges which exceed its policy capabilities. Millions of Iranians have fallen into poverty in recent years. Inflation hovers at 35 percent. The return of the maximum pressure sanctions campaign has accelerated the collapse of Iran's currency against the dollar. The regime now appears to resemble the late Soviet Union, holding power through coercion and stale ideology.

Between 2002 and 2003, and then, between 2013 and 2014, Iran navigated similar Western military threats, regional instability, and domestic discontent by blending belligerent rhetoric with

lengthy diplomatic talks designed to soften sanctions. Tehran avoided actions which could have sparked a conventional war with the United States.

This strategy led to the 2015 Joint Comprehensive Plan of Action. This deal committed Tehran to potentially reversible nuclear concessions in exchange for long-term or permanent sanctions relief that it used to sustain the regime and resource its regional militias and missile program.

We and our partners must use this period to foster debate among Iran's leadership that leads to the abandonment of regional adventurism and the pursuit of a nuclear weapon.

Thank you for your attention. I look forward to your comments and questions.

[The prepared statement of Mr. Roule follows:]

House Foreign Affairs Committee Hearing: "A Return to Maximum Pressure: Comprehensively Countering the Iranian Regime's Malign Activities," 1 April 2025.

Norman Roule - Non-resident Senior Advisor at the Center for Strategic and International Studies Warfare, Irregular Threats, and Terrorism Program

Chairman Mast, Ranking Member Meeks, and distinguished members of the Committee, thank you for the opportunity to appear today. Tehran has used its nuclear program and development of regional militias and terrorist operations as the foundation of its power projection for more than two decades. Its operations resulted in multiple, lethal, and dramatic operations against Americans and our partners. Iran is responsible for the loss of hundreds of American lives and tens of thousands of lives in the Middle East. Iran's Islamic Revolutionary Guard Corps Quds Force has left a path of destruction that has cost the Middle East a generation of hope and progress. Tehran's involvement in these operations has been routinely acknowledged by multiple countries and in various fora. But it has evaded consequences sufficient to change this strategy, in part, due to a concern that it would respond to significant retaliation by undertaking the final steps needed to acquire a nuclear weapon. Thus, Iran's nuclear program and its proxy campaigns have become entwined as Iran's malign sword and shield against its neighbors and the international community.

There have been many Iran-related briefings before this committee and its counterparts over the years. Most have told a story of Iran gradually building on its aggressive capabilities while successfully testing international red lines. Today's briefing will be different. The events of the past year have significantly altered the strategic landscape, presenting policy options that hold the promise of real change.

I would like to begin with a brief update on the status of Iran's nuclear and proxy programs. I will then comment on how Tehran likely perceives its strategic situation and its available diplomatic options. I will close with some considerations for policymakers.

First, a brief overview of Iran's nuclear program status – Iran's Shield.

Director of National Intelligence (DNI) Gabbard stated at the 25 March 2025 Annual Threat Assessment Hearing that the Intelligence Community (IC) continues to assess that Iran is not building a nuclear weapon and that Supreme Leader Khamenei has not authorized the nuclear weapons program that he suspended in 2003. The IC does report a significant increase in Iranian public discussion of the issue of nuclear weapons acquisition, likely emboldening nuclear weapons advocates within Iran's decision-making apparatus. The International Atomic Energy Agency's (IAEA) 26 February 2025 quarterly report on Iran does not contradict the DNI's statement, but it is alarming in three areas:

First, the IAEA notes that Iran continues to expand its production of 60 percent enriched uranium. Uranium enriched to this level represents a significant step, dramatically reducing the time required to complete the enrichment cycle and produce fissile material

for a nuclear weapon. The IAEA could not be clearer: "The significantly increased production and accumulation of high enriched uranium by Iran, the only non-nuclear weapon state to produce such nuclear material, is of serious concern."

Iran appears capable of producing its first quantity of 90 percent enriched uranium sufficient for one nuclear weapon in about a week. Tehran's current stock of 60 percent enriched uranium is now sufficient for six or seven nuclear weapons. Absent international action and assuming use of Iran's entire stock of enriched uranium and centrifuge capacity, some experts believe Iran could produce fissile material sufficient for approximately ten nuclear weapons in a month.

Second, Iran continues to increase the number and sophistication of its centrifuge cascades. This is important because it would allow Iran to accelerate any potential weaponization should it choose to take this step. Advanced centrifuges also enrich more quickly with fewer centrifuges, which could impact the design of any potential covert enrichment facility.

Last, Iran continues to hamper IAEA efforts to verify its existing nuclear program, which, absent solid intelligence, must reduce our confidence that we will be able to detect any possible diversion of nuclear material or equipment to a covert weapons program. The absence of transparency comes at a time when Iran's program is growing in scale, complexity, and opportunities for potential covert activity. Despite increasingly tough talk from the IAEA Board of Governors, such as its November 2024 censure of Iran, Tehran is likely to continue to deny the IAEA the access it requires and will threaten to reduce access further in the face of any further IAEA pressure.

In short, Iran looks very much like a country developing a nuclear weapons program, albeit one which has yet to make the final decision because it either believes it will face discovery and ruinous military consequences or that the current approach offers significant diplomatic leverage beyond that found in a weapon. If the latter case ever becomes reality, Iran will likely make the final dash to weaponization when it believes it can do so securely and successfully.

Although outside the subject of this hearing, I note that Iran's long-range ballistic missile program also looms as a threat to the U.S. and all our partners. During his testimony on March 26, 2025, U.S. Strategic Command General Anthony Cotton stated that Iran's work on space launch vehicles likely shortens the timeline to produce an intercontinental ballistic missile (ICBM) due to the similarities in technology. Much like Iran's nuclear program, Iran appears to be using the mask of civilian activity to build a strategic weapons threat, in this case one that could also be a means to deliver a nuclear weapon.

Allow me to now speak briefly about Iran's proxy program – Iran's Sword.

Proxy operations offer the Islamic Republic the promise of significant regional influence at a low cost and with minimal consequence. For years, Iran's seniormost leaders have

routinely sat with foreign terrorists and militia leaders and boasted of their material support to these groups. The international community has publicly displayed tons of weapons that have been targeted against tens of thousands of civilians from almost every country in the world living in the Middle East, Ukraine, or operating commercial shipping in international waters. The United States routinely acknowledges that Iran has been behind the deaths of hundreds of Americans in Iraq, attacks on our embassies, and terrorist attacks against Americans abroad and in the Homeland. Iran provided or enabled the hundreds of missiles and drone attacks conducted by the Houthis in the Red Sea, threatening our war fighters, killing civilian mariners, and inflicting untold billions of dollars of damage on the world economy.

The dramatic changes in the Middle East present significant opportunities to foster long-term and positive transformations that will weaken Iran's influence and enhance regional peace and stability. As a result of Israeli actions in Lebanon, Gaza, and Syria, and U.S. actions in Yemen, especially over the past two weeks, Iran's regional proxy groups no longer represent a strategic threat. However, the groups continue to exist along with Iran's proxies in Iraq, militants such as Bahrain's Al-Ashtar Brigade, and remnants of its Afghan and Pakistani proxies from Syria. It is difficult to overstate the priority of ensuring that these groups are not allowed to recover. The Middle East is witnessing many positive changes in countries such as Saudi Arabia, the United Arab Emirates, Jordan, and Bahrain. Any weakening of Iran's malign adventurism will strengthen the ability of these long-time American partners to bring peace, prosperity, and political engagement to a troubled region.

The Quds Force remains largely intact and well-resourced. Quds Force leadership likely believes its damaged proxy partners can be revived over time and is prepared to provide them with funds, cyber assistance, training, and political support. Quds Force weapons routinely involve systems capable of mass casualties against civilian targets, such as ballistic missiles, drones, naval mines, and explosive boats. Iran also utilizes its proxies as trainers in other countries. We have seen numerous reports of Lebanese Hezbollah in Yemen and troubling reports of Houthis seeking to establish themselves in Syria, Iraq, and East Africa. The U.S. and our partners must show Iran that this cruel artery of violence will not be revived.

Quds Force operations in the Red Sea basin and the region surrounding the Bab al-Mandab give Tehran direct influence over global trade and energy markets. This ambition has driven the Quds Force to share multiple missile and drone systems with the Houthis. There is every reason to expect that the sophistication and lethality of these weapons will increase if Iran is allowed to re-establish its logistics connections with Yemen. There have also been reports that Iran seeks a permanent presence in the Red Sea basin through a port agreement with Sudan. Iran's goals likely include long-term influence of the Red Sea transportation route, as well as the ability to establish militant training sites and weapons transshipment centers in East Africa to threaten the western Arabian peninsula, Israel, and the east Mediterranean.

However, Iran's proxy architecture has vulnerabilities that can be exploited. Diplomatic

and economic sanctions are important, but they must be consistent and meaningful. Our first step should be to insist that partners tighten Iran's diplomatic isolation. Europe cannot condemn Iran's provision of drones to Russia that have led to the death of innocent Ukrainians and missiles to Houthis which have damaged Europe's economy and then provide Iran's now former Vice-President for Strategic Affairs Mohammad Javad Zarif a high-profile propaganda session at the World Economic Forum in Davos as it did in January of this year.

If the Quds Force is to behave like a terrorist organization, the architecture and personnel of its logistics, training, and transportation system should be treated accordingly. Yemen offers our first opportunity to change this calculus. No Quds Force officer in Yemen involved in enabling Houthi lethal operations against U.S. personnel should consider himself safe. Historically, Iran has shown a reluctance to risk its personnel for proxy interests. Iran responded to severe casualties in Syria in 2013 by reducing the number and role of its personnel in that battleground. Any reduction of Quds Force personnel in proxy territory will decrease the efficiency, organization, and lethality of the proxy.

I would like to speak briefly about how the world likely appears to Tehran, and what we might infer from its past behavior regarding its future choices.

There is no question that Iran's leaders understand the Islamic Republic is more vulnerable to military attack than at any time in the last two decades. The October 2024 Israeli strikes on Iran demonstrated that Iran's air defenses could not deter Israel or protect key Iranian installations (or leaders). The Israeli strikes and Iran's failed counterattacks also showed Tehran (and other adversaries) the overwhelming power of U.S. military technology. The strength and smooth coordination of regional air defense actors demonstrated the results of years of work by U.S. military leaders and their regional counterparts, who built relationships that enabled this historic success. With the loss of its only and impotent state ally Syria, Iran stands alone.

Iran's leaders must also consider their exposure to Israel's formidable intelligence apparatus. In addition to the precision of Israel's air strikes on Iran and Iranian personnel in Syria in April 2024, Tehran watched the extraordinary pager operation by which Israel decimated Hezbollah cadres and the killings of such security-minded terrorists as Ismail Haniya, Yahya Sinwar, and Hasan Nasrallah. The actions were built on a record that included the 2018 Israeli seizure of Iran's nuclear cache and years of reports of precision attacks against Iranian officials and missile and nuclear facilities. Together, these actions imply a considerable degree of Israeli insight into sensitive Iranian and Iranian proxy facilities and leadership locations.

Much has been said of Iran's domestic woes, and they deserve brief comment. Iran's economy has been sustained, in large part, by oil exports to China. Under renewed U.S. sanctions pressure, Iran's currency has collapsed against the dollar, reaching historic lows on a near-weekly basis. Iran's recently dismissed Finance Minister admitted that over the past seven years, an additional ten million Iranians fell below the poverty line.

Inflation hovers around 35 percent. The economic hardship is all the harsher for Iranians who compare their lifestyle to that of the citizens of the United Arab Emirates and Saudi Arabia, who are experiencing a social and economic renaissance a short distance away. Iran's foreseeable economic outlook is likely to be bleak.

Unsurprisingly, the Islamic Republic is deeply unpopular within Iran. Election turnout, once a source of pride for the regime, has become a political embarrassment. The regime bears a strong resemblance to the late Soviet Union, a revolutionary government whose ideology is dismissed by even its most loyal supporters but whose leaders continue to parrot loyalty to the system. However, Tehran's most significant challenge lies ahead. Iran's revolutionary generation is quickly fading. Supreme Leader Ali Khamenei will be 86 years old this month. It remains an open question whether—and how—Iran's leaders will retain power during the transition to the first post-revolutionary generation of leadership.

Yet, although Iran's situation is dire, some of the challenges it faces do have precedents. Tehran's leadership is likely to draw upon past experiences in the coming months as it devises strategies to respond to U.S., regional, and domestic pressures.

In 2002-2003 and 2013-2014, Tehran faced the threat of a Western military attack, as well as regional turbulence that presented both profound threats and opportunities. Domestically, the Islamic Republic dealt with economic decline, political unrest, and periods of widespread unrest. During each period, the U.S. and Europe used sanctions to pressure Iran to halt its nuclear expansion and offered negotiations as a path towards sanctions relief. The global scene was marked by increasingly complex and sometimes contentious relations among the U.S., Europe, Russia, and China. Further, American public opinion was unenthusiastic about launching a new war in the Middle East.

Tehran's priority in each example was the preservation of the regime and the avoidance of military conflict with the U.S. The risk of conflict was real. The Iraq and Afghan Wars placed thousands of U.S. military personnel on both sides of Iran. The risk of U.S. military action against Iran in 2011 and 2012 was growing as Iran threatened to close the Persian Gulf to U.S. forces.

Tehran undertook no actions that would have led to a war that Iran would have inevitably lost. Instead, they blended public defiance and sometimes aggressive rhetoric with back-channel offers of indirect engagement via third parties themselves inclined towards diplomacy. Between 2003 and 2005, Tehran's representatives undertook lengthy negotiations with Europe in ultimately unsuccessful talks. From 2013 to 2015, Iran worked with the Permanent Members of the United Nations Security Council and Germany (P5+1) to develop the Joint Comprehensive Plan of Action (JCPOA). Lengthy and often indirect nuclear negotiations have become a mainstay of Iranian diplomatic practice, including during the Biden administration.

Tehran's approach not only prevented military strikes but discouraged coalitions, delayed the imposition of additional sanctions, and fostered an increasingly partisan debate among adversaries regarding the wisdom of engagement versus confrontation with Iran.

In cases where Iran did commit to significant nuclear concessions, the compromises were generally reversible.

- In 2003, Iran halted its secret nuclear weaponization program. In an apparent effort to maintain the nuclear weapons option, it retained some dual-use programs and an archive of critical weaponization material. Iran gradually increased the scale of its enrichment program and expanded nuclear facilities to include the Fordow Fuel Enrichment Facility.
- Following the conclusion of the JCPOA in 2015, Iran accepted significant, although in some cases finite, restrictions on its nuclear program in exchange for substantial and permanent sanctions relief. The deal did not require Iran to halt domestic enrichment, close facilities, or end its nuclear-related research programs. Critics argued that Iran preserved those portions of its nuclear program needed to retain the weaponization option and gained sanctions relief that sustained its domestic oppressive machinery as well as funded its missile and Quds Force programs. Iran soon argued that any actions related to Quds Force behavior would threaten hardliner support for the deal.

The core leadership of the Islamic Republic will struggle to deal with today's unprecedented domestic and foreign threats. History suggests that Tehran will aim to diffuse external pressures by repeating its past diplomatic strategy. A comprehensive approach to countering the Islamic Republic's malign activities must maintain consistent pressure on Iran's leaders to end proxy activities and dangerous nuclear expansion. The following steps will help achieve this.

- Ensure bipartisan support for aggressive diplomatic, financial, and military policies by ourselves and our partners against the Quds Force and Iranian proxy architecture to prevent them from regaining the initiative. This should include steps to counter regional media narratives that support proxy actors.
- Demonstrate the credibility of the U.S. military option. In addition to the ongoing U.S. military operations against Houthi leadership and infrastructure, the U.S. should announce that Quds Force personnel or facilities involved in Houthi military operations against U.S. war fighters will be at risk. Likewise, the U.S. should reiterate that Iran will face U.S. military action if it undertakes nuclear weaponization, the development of an intercontinental missile, or undertakes terrorist operations against Americans.
- Undertake robust enforcement of the Maximum Pressure sanctions campaign with an emphasis on Iran's oil shipping, oil purchasers, and financial networks. Initiate steps to trigger the "snapback" mechanism of the United Nations (UN) Security Council Resolution 2231 to address Iran's expanded nuclear program.
- Avoid lengthy indirect talks. Stress that while the U.S. remains committed to a diplomatic solution with Iran over its nuclear program, the administration rejects the prospects of lengthy talks that leave Iran with reversible temporary nuclear constraints and sanctions relief that sustains regional aggression.

- Continue to invest in regional military, economic, and commercial partnerships. Regional economic and social success is as essential to our security interests as their military strength.

Thank you for your attention. I look forward to your comments and questions.

Mr. LAWLER. Thank you, Mr. Roule.
I now recognize Ms. Jungman for her opening statement.

STATEMENT OF CLAIRE JUNGMAN

Ms. JUNGMAN. Chairman Lawler, Ranking Member Meeks, and members of the committee, thank you for the opportunity to testify today.

The topic of this hearing and disrupting Iran's malign behavior is a matter of urgent national security. At the heart of Iran's malign behavior is its oil sector. Despite U.S. sanctions, Iran continues to export over 1.5 million barrels of oil per day, earning tens of billions of dollars annually. These revenues are not just supporting Iran's economic; they are directly funding terrorism, nuclear escalation, and regional destabilization.

That's because up to half of Iran's oil exports are now controlled by the Islamic Revolutionary Guard Corps, or IRGC. This means that every barrel of Iranian oil sold on the black market strengthens the IRGC's hand, bankrolling groups like Hamas, Hezbollah, and the Houthis—underwriting weapons development and fueling nuclear expansion.

We have seen the consequences. Iran-backed militants have launched attacks across the region, emboldened by the financial cushion that oil exports have provided. New enforcement actions in late 2024, including designations on nearly 50 tankers and sanctions on Chinese refiners, have started to make an impact.

Iran's oil exports have dipped and its access to hard currency is beginning to tighten. But this campaign must continue and expand. The goal should be to drive Iran's oil revenues as close to zero as possible, cutting off the financial oxygen that allows the regime to operate abroad and repress at home.

Beyond oil, Iran is increasingly turning to other illicit revenue streams: crypto mining and laundering, shadow banking networks, dollar smuggling from Iraq, and barter trade with Russia and Syria. These activities are harder to track, but deeply dangerous.

In total, we estimate Iran has generated over \$100 billion in oil revenues since 2021 and additional billions through crypto and smuggling networks. These funds have empowered its proxies and enabled nuclear brinksmanship, but sanctions can still work. When properly enforced, they limit Iran's budget, disrupt its ability to pay militias, and increase the costs of escalation.

To that end, I offer a few recommendations:

First, continue aggressive enforcement against Iran's ghost fleet and shipping facilitators. Sanction every vessel, registry, insurer, captain, and port that helps move Iranian oil.

Second, target foreign enablers, especially in China and Malaysia, who knowingly buy or store Iranian crude.

Third, expand maritime interdictions and use AI tools to identify suspicious tanker behavior in real time. Each vessel seized directly cuts into Iran's revenue and deters further evasion.

Fourth, establish a multilateral task force, modeled on the Russian sanctions coordination effort, to enable real-time intelligence-sharing on Iranian oil smuggling, front companies, and crypto laundering. Unified action will help close off evasion pathways faster and more effectively.

Fifth, strengthen crypto enforcement by tracing wallets linked to Iran and sanctioning mining operations.

And finally, Congress should ensure that secondary sanctions remain a powerful deterrent, holding accountable any foreign entity that transacts with the IRGC or its proxies.

In closing, the United States must send a clear message: Iran cannot continue to fund terrorism, threaten its neighbors, and defy nuclear commitments without consequences. We must remain united, vigilant, and unyielding in our pursuit of financial pressure. Because cutting off the money is our best tool to constrain Iran's most dangerous activities.

Thank you.

[The prepared statement of Ms. Jungman follows:]

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TESTIMONY BEFORE HOUSE FOREIGN AFFAIRS COMMITTEE
APRIL 1, 2025

Chairman Mast, Ranking Member Meeks, and members of the Committee, thank you for the opportunity to testify today. The topic of this hearing could not be more urgent: identifying and disrupting Iran's illicit revenue streams and understanding how these funds sustain Tehran's malign activities—especially its sponsorship of terror proxies and advancing nuclear program. As long as Iran's oil exports remain robust, the regime will retain the financial oxygen it needs to fund terrorism and develop a nuclear weapons capability. Disrupting these revenue streams is a national security imperative.

Iran's Oil Sector and the IRGC's Involvement

Iran's oil and gas sector remains the lifeblood of its economy and regime finances. Iran holds the world's fourth-largest crude oil reserves and continues to produce around 3 million barrels per day (bpd) of crude oil.¹ Despite sanctions, oil income is Tehran's principal source of foreign currency.² Importantly, Iran's Islamic Revolutionary Guard Corps (IRGC)—designated as a Foreign Terrorist Organization in 2019—is deeply entrenched in this sector. The IRGC and its Qods Force (IRGC-QF) have tightened their grip over Iran's oil industry, controlling up to half of Iran's oil exports today, a sharp rise from roughly 20 percent in 2021.³

This integration of the IRGC into Iran's oil supply chain means that oil revenues directly bankroll the regime's military and terrorist activities. U.S. authorities note that Iran generates “the equivalent of billions of dollars each year” from oil sales specifically to fund the IRGC's agenda—including its nuclear program, ballistic missile production, and support for terrorist proxies like Hamas, Hizballah, and the Houthis.⁴ Indeed, the Department of Justice underscored that “while the IRGC and its Qods Force are the regime's terrorist strongarms, oil is its lifeblood,” enabling Tehran to finance terrorism abroad.⁵ Since 2012, Iran is estimated to have channeled over \$20 billion of oil income to militant groups. Today, that pattern continues at an alarming scale. For example, one multi-country oil smuggling network directed by a senior IRGC-QF official was caught funneling proceeds to the QF, with \$108 million seized and 500,000 barrels of Iranian

¹ “Iran's Oil Output Rises by 34,000 Barrels in February 2025,” *Tehran Times*, March 14, 2025, <https://www.tehrantimes.com/news/510925/iran-s-oil-output-rises-by-34-000-barrels-in-february-2025>.

² Jonathan Saul and Parisa Hafezi, “Iran's Revolutionary Guards Extend Control over Tehran's Oil Exports, Sources Say,” December 18, 2024, <https://www.japantimes.co.jp/news/2024/12/18/world/politics/iran-revolutionary-guards-oil>.

³ Jonathan Saul and Parisa Hafezi, “Iran's Revolutionary Guards Extend Control over Tehran's Oil Exports, Sources Say,” December 18, 2024, <https://www.japantimes.co.jp/news/2024/12/18/world/politics/iran-revolutionary-guards-oil>.

⁴ U.S. Department of the Treasury, “Treasury Targets Oil Network Generating Hundreds of Millions of Dollars for Iran's Military,” press release, February 6, 2025, <https://home.treasury.gov/news/press-releases/sb0015#:~:text=Iran%20generates%20the%20equivalent%20of%20these%20oil%20sales%20and%20shipment%20https://home.treasury.gov/news/press-releases/sb0015>.

⁵ U.S. Department of Justice, “Justice Department Announces Terrorism and Sanctions-Evasion Charges and Seizures Linked to Illicit, Billion-Dollar Global Oil Trafficking Network That Finances Iran's Islamic Revolutionary Guard Corps and Its Malign Activities,” press release, February 2, 2024, <https://www.justice.gov/archives/opa/pr/justice-department-announces-terrorism-and-sanctions-evasion-charges-and-seizures-linked#:~:text=%E2%80%9CWhile%20Iran%E2%80%99s%20Islamic%20Revolutionary%20Guard,built%20to%20fund%20its%20regime.>

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TESTIMONY BEFORE HOUSE FOREIGN AFFAIRS COMMITTEE
APRIL 1, 2025

oil confiscated by U.S. law enforcement in early 2024.⁶ In short, Iran's oil sector and the IRGC are inseparable—oil underwrites the IRGC's operations, and the Guards, in turn, oversee much of Iran's oil export apparatus. This reality makes vigorous oil sanctions enforcement vital.

New information since 2023 has shed light on how extensively the IRGC orchestrates and profits from Iran's oil trade, blurring any distinction between "licit" oil sales and IRGC illicit finance. Because the IRGC (particularly the QF) now controls up to 50 percent of Iran's oil exports by volume, perhaps half of Iran's roughly \$50 billion in annual oil earnings are flowing through IRGC-managed channels. This has occurred through deliberate strategy: years ago, the late IRGC-QF commander Qassem Soleimani set up an elaborate clandestine oil export network, which the IRGC expanded after U.S. sanctions were reimposed in 2018. Today, that network functions as a parallel oil marketing apparatus alongside Iran's official oil ministry.⁷

The IRGC's oil enterprise operates by covert means. As described, the Guards deploy a "shadow fleet" of hundreds of aging tankers to carry sanctioned Iranian crude around the globe. These tankers are often foreign-flagged and disguised through repainted hulls, altered vessel identification numbers, and forged ownership documents. This ghost fleet has grown from a few dozen vessels in 2018 to an estimated 477 tankers by the end of 2024, as Iran and its partners purchased or repurposed ships to evade tracking. These vessels engage in tactics such as disabling transponders, falsifying paperwork, frequently changing names/flags, and conducting ship-to-ship (STS) transfers at sea to hide the oil's origin. The IRGC-QF directs many of these deceptive operations. For example, Treasury reported that an IRGC-linked front company, Sepehr Energy, used falsified maritime documents and STS transfers to conceal millions of barrels of oil shipped to China on behalf of Iran's Armed Forces. In that case, the oil tanker "SIRI" was literally repainted and renamed mid-voyage to avoid detection. Such methods are now commonplace across Iran's export supply line.⁸

Beyond the ships themselves, the IRGC relies on a web of foreign-based front companies, brokers, and middlemen to market Iranian oil. These fronts are often registered in countries like China, the UAE, Hong Kong, Singapore, and Malaysia, where they arrange sales and logistics while obscuring any overt ties to Iran or the IRGC. U.S. federal indictments unsealed in February 2024 exposed one such billion-dollar scheme: a Hong Kong company, China Oil & Petroleum Limited, was identified as an IRGC-QF front that

⁶ U.S. Department of Justice, "Justice Department Announces Terrorism and Sanctions-Evasion Charges and Seizures Linked to Illicit, Billion-Dollar Global Oil Trafficking Network That Finances Iran's Islamic Revolutionary Guard Corps and Its Malign Activities," press release, February 2, 2024, <https://www.justice.gov/archives/opa/pr/justice-department-announces-terrorism-and-sanctions-evasion-charges-and-seizures-linked#:~:text=%E2%80%9CWhile%20Iran%E2%80%99s%20Islamic%20Revolutionary%20Guard,build%20to%20fund%20its%20regime>.

⁷ Jonathan Saul and Parisa Hafezi, "Iran's Revolutionary Guards Extend Control over Tehran's Oil Exports, Sources Say," Reuters, December 18, 2024, <https://www.japantimes.co.jp/news/2024/12/18/world/politics/iran-revolutionary-guards-oil>.

⁸ U.S. Department of the Treasury, "Treasury Targets Oil Network Generating Hundreds of Millions of Dollars for Iran's Military," press release, February 6, 2025, <https://home.treasury.gov/news/press-releases/sb0015#:~:text=Sepehr%20Energy%20and%20its%20affiliate,destabilizing%20activities%20around%20the%20world>.

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TESTIMONY BEFORE HOUSE FOREIGN AFFAIRS COMMITTEE
APRIL 1, 2025

laundered oil revenue through shell companies and correspondent bank accounts.⁹ In that scheme, senior IRGC-QF officers and a Turkey-based energy firm colluded to sell Iranian oil to buyers in China, Russia, and Syria, with proceeds routed back to fund the QF. The Justice Department charged nine individuals (including an IRGC leader) for terrorism and sanctions evasion, and seized over \$100 million from the conspiracy.¹⁰ These charges revealed sophisticated techniques: front companies in third countries to disguise IRGC ownership, fraudulent documents to mask the oil's origin, use of STS transfers to blend Iranian oil, and even barter arrangements to avoid traceable payments. It is telling that the IRGC-QF was effectively running an international oil trading and money laundering operation rivaling a national oil company in scope.

Iran's Oil Revenues and Exports (2023-Early 2025)

Despite sanctions, Iran's oil exports surged through 2023 and much of 2024, reaching levels unseen since prior to 2018. According to both U.S. government and independent estimates, Iran's crude oil and condensate exports averaged approximately 1.5–1.6 million barrels per day in 2023,¹¹ climbing further in 2024. According to estimates from United Against Nuclear Iran, in total, Iran exported about 530 million barrels of oil in 2023 and roughly 587 million barrels in 2024—an increase of nearly 11 percent year-on-year.¹² From 2021 to 2024, Iran cumulatively exported almost 1.98 billion barrels of oil, reflecting the substantial volumes enabled by inconsistent sanctions enforcement during that period.¹³ These volumes approach Iran's pre-sanctions export heights, underscoring how much revenue the regime clawed back recently.

Oil revenue has correspondingly rebounded. The U.S. Energy Information Administration (EIA) estimates that Iran's net oil export earnings were about \$53 billion in both 2022 and 2023, up from roughly \$37 billion in 2021. (Higher export volumes in 2023 did not translate into higher revenue than 2022 due to a decline in global oil prices over that period).¹⁴ Over the full 2021–24 timespan, Iran's crude oil and condensate exports

⁹ Financial Crimes Enforcement Network, "FinCEN Advisory to Financial Institutions to Counter the Financing of Iran-Backed Terrorist Organizations," advisory, May 8, 2024, <https://home.treasury.gov/news/press-releases/sb0015#:~:text=Sepehr%20Energy%20and%20its%20affiliate,destabilizing%20activities%20around%20the%20world>.

¹⁰ U.S. Department of Justice, "Justice Department Announces Terrorism and Sanctions-Evasion Charges and Seizures Linked to Illicit, Billion-Dollar Global Oil Trafficking Network That Finances Iran's Islamic Revolutionary Guard Corps and Its Malign Activities," press release, February 2, 2024, <https://www.justice.gov/archives/opa/pr/justice-department-announces-terrorism-and-sanctions-evasion-charges-and-seizures-linked#:~:text=%E2%80%9CWhile%20Iran%E2%80%99s%20Islamic%20Revolutionary%20Guard,built%20to%20fund%20its%20regime>.

¹¹ U.S. Energy Information Administration, *Report on Iranian Petroleum and Petroleum Product Exports*, pg. 3, October 2024, https://www.eia.gov/international/content/analysis/special_topics/SHIP_Act/SHIP-Act.pdf.

¹² Claire Jungman and Daniel Roth, "UANI's Final Tanker Tracker of 2024: A Year in Review," United Against Nuclear Iran, January 3, 2025, <https://www.unitedagainstanucleariran.com/blog/uanis-final-tanker-tracker-of-2024-year-review#:~:text=In%202024%2C%20Iran%20exported%20587.98%20billion%20barrels%20of%20oil>.

¹³ Claire Jungman and Daniel Roth, "UANI's Final Tanker Tracker of 2024: A Year in Review," United Against Nuclear Iran, January 3, 2025, <https://www.unitedagainstanucleariran.com/blog/uanis-final-tanker-tracker-of-2024-year-review#:~:text=In%202024%2C%20Iran%20exported%20587.98%20billion%20barrels%20of%20oil>.

¹⁴ U.S. Energy Information Administration, *Report on Iranian Petroleum and Petroleum Product Exports*, pg. 2, October 2024, https://www.eia.gov/international/content/analysis/special_topics/SHIP_Act/SHIP-Act.pdf.

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TESTIMONY BEFORE HOUSE FOREIGN AFFAIRS COMMITTEE
APRIL 1, 2025

would be valued at around \$135 billion in gross terms.¹⁵ Even accounting for the steep discounts Iran offers to entice buyers under sanctions (often \$10–30 per barrel off market prices), Tehran likely realized well over \$100 billion in actual oil revenue during the past four years. These funds bolster the regime's resilience against economic pressure and enable its regional aggression.

Iran's oil export destinations highlight another concerning trend. China has become by far the dominant buyer of Iranian crude, accounting for an estimated 90 percent or more of Iran's oil exports in 2023–24. United Against Nuclear Iran's tanker tracking found that China imported about 431 million barrels of Iranian oil in 2023 (over 80 percent of Iran's exports), rising to 533 million barrels in 2024 (over 91 percent of those exports).¹⁶ This illicit oil trade is largely carried out via indirect channels—often through Iran's ghost fleet tankers offloading to other ships or ports before the oil reaches China. The remaining Iranian oil has trickled to a few other destinations. For example, Syria (which receives Iranian oil as strategic aid) saw deliveries fall from roughly 40 million barrels in 2023 to about 22 million in 2024, and small volumes reached countries like the United Arab Emirates or were marked “unknown” as Iran and its intermediaries obfuscated shipments.¹⁷ Notably, China's purchases of Iranian oil increased by over 20 percent last year despite U.S. sanctions, filling the gap left by OPEC+ production cuts and helping Beijing secure discounted crude. This development has cemented a symbiotic relationship: Iran relies on China as an economic lifeline, and China benefits from cheap sanctioned oil.

This arrangement carries significant geopolitical consequences. Beijing's continued purchase of discounted Iranian crude undercuts the integrity of U.S. sanctions and provides Iran with the hard currency needed to fund regional aggression. Moreover, by undercutting lawful global oil suppliers with discounted sanctioned crude, Iran distorts global energy markets and harms American producers. China benefits economically from suppressed oil prices, while the U.S. and its allies confront the security fallout of Iran's strengthened proxies. Without meaningful consequences for these purchases, the sanctions regime risks further erosion. Conversely, designations on Chinese refiners and trading companies in early 2025—such as the sanctions on Shandong Shouguang Luqing Petrochemical—have demonstrated that the U.S. is now willing to extend enforcement pressure down the supply chain. This approach, if sustained, could meaningfully disrupt Iran's energy trade.

The resurgence in Iran's oil exports supplied Tehran with a surge of hard currency. Iranian officials, emboldened by the inflows, drafted government budgets assuming even higher export targets (e.g., 1.85 million bpd in the next fiscal years as of early 2024).¹⁸ The resurgence of oil income coincided with Iran escalating support to militant proxies—from supplying UAVs and missiles to Hizballah and the Houthis, to bankrolling Hamas's military buildup. The October 2023 Hamas war was partly funded by Iran's oil boom in the months prior.

¹⁵ Dalga Khatinoglu, “Iran Sold 2 Billion Barrels of Oil During Biden's Presidency,” Iran International, January 4, 2025, <https://www.iranintl.com/en/202501043721>.

¹⁶ Claire Jungman and Daniel Roth, “UANI's Final Tanker Tracker of 2024: A Year in Review,” United Against Nuclear Iran, January 3, 2025, <https://www.unitedagainstanucleariran.com/blog/uanis-final-tanker-tracker-of-2024-year-review#:~:text=In%202024%2C%20Iran%20exported%20587.98%20billion%20barrels%20of%20oil>.

¹⁷ Claire Jungman and Daniel Roth, “UANI's Final Tanker Tracker of 2024: A Year in Review,” United Against Nuclear Iran, January 3, 2025, <https://www.unitedagainstanucleariran.com/blog/uanis-final-tanker-tracker-of-2024-year-review#:~:text=In%202024%2C%20Iran%20exported%20587.98%20billion%20barrels%20of%20oil>.

¹⁸ Dalga Khatinoglu, “Iran Sold 2 Billion Barrels of Oil During Biden's Presidency,” Iran International, January 4, 2025, <https://www.iranintl.com/en/202501043721>.

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TESTIMONY BEFORE HOUSE FOREIGN AFFAIRS COMMITTEE
APRIL 1, 2025

However, late 2024 brought signs of change: beginning in October, Iran's exports dipped below 1.4 million bpd on average.¹⁹ This decline, in part, could be attributed to new U.S. sanctions on dozens of tankers in fall 2024 and the anticipation of a tougher U.S. sanctions posture after that year's elections. The robust enforcement beginning in late 2024 is already constraining Iran's ability to fund its proxies. Every tanker seized or bank account frozen directly impedes cash flow to such groups. Strategically, this weakens Iran's hand in the region. We have seen the IRGC-QF have to become more creative and frugal when resources are scarce (as during 2019–20). Cutting off Iran's oil revenues in 2025 will degrade its ability to pay militias, to purchase advanced weaponry, and to provide stipends to fighters. That in turn can reduce the frequency and scale of proxy attacks, whether in Yemen, Gaza, Syria, or Iraq. From a geopolitical standpoint, rigorous sanctions enforcement is a deterrence tool: it not only punishes Iran for past malign behavior but also signals that continued aggression (e.g. nuclear escalations or terrorist plots) will be met with further financial isolation. This dynamic is particularly important as Iran's nuclear program approaches dangerous thresholds. If Tehran knows that nuclear brinksmanship will result in being economically crippled, it may calculate that the costs of escalation outweigh the benefits.

Additionally, Beijing has recently pressured its small "teapot" refineries—the main consumers of Iranian crude—to scale back due to environmental and efficiency concerns.²⁰ These factors illustrate that robust enforcement—and even the credible expectation of it—can significantly curb Iran's oil output. Indeed, Iran's own oil ministry acknowledged the risk by lowering its short-term export projections. Going forward, sustaining pressure on Iran's oil revenues will be vital to constrain the regime's funding for malign activities.

Illicit Revenue Streams Beyond Oil (Cryptocurrency, Front Companies, Regional Trade, Smuggling)

Since 2023, Iran has increasingly diversified how it earns and moves funds illegally, often to supplement oil revenues or evade detection. Key illicit revenue streams gaining importance include the use of cryptocurrency, complex front company networks, regional trade and bartering, and various smuggling activities.

- **Cryptocurrency:**
 - Iran has turned to crypto both as a means of storing/transferring value and as a source of new revenue (through mining). In late 2023, U.S. and Israeli investigations revealed that Iran-backed terrorist groups like Hamas are using crypto exchanges to solicit and launder funds.²¹ In fact, Treasury's first round of sanctions after the October 7, 2023, Hamas attack targeted a Gaza-based virtual currency exchange and its operator that Hamas used to receive international crypto donations.²² Hamas's financial facilitators leveraged digital

¹⁹ "Iran Tanker Tracker," United Against Nuclear Iran, last updated March 3, 2025, <https://www.unitedagainstanucleariran.com/tanker-tracker?tab=1>.

²⁰ Dalga Khatinoglu, "Iran Sold 2 Billion Barrels of Oil During Biden's Presidency," Iran International, January 4, 2025, <https://www.iranintl.com/en/202501043721>.

²¹ Rowan Scarpino and Jocelyn Trainer, "Sanctions by the Numbers: 2023 Year in Review," Center for a New American Security, June 27, 2024, <https://www.cnas.org/publications/reports/sanctions-by-the-numbers-2023-year-in-review#:~:text=Following%20the%20October%207%2C%202023%2C,States%20partnered%20with%20the%20United>.

²² Treasury, "Following Terrorist Attack on Israel, Treasury Sanctions Hamas Operatives and Financial Facilitators," October 18, 2023.

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TESTIMONY BEFORE HOUSE FOREIGN AFFAIRS COMMITTEE
APRIL 1, 2025

wallets to crowdfund anonymously, attempting to bypass the formal banking system.²³ These actions prompted OFAC to designate that exchange and related Hamas crypto investment portfolios on October 18, 2023, and to expand sanctions in January 2024 (in coordination with the UK and Australia) against additional Hamas-linked crypto networks and IRGC-QF financiers who funneled cryptocurrency to Hamas and Palestinian Islamic Jihad.

- Iran's government itself mines Bitcoin at an industrial scale to generate income. Iran legalized crypto mining in 2019, and in the five years since, it has raised millions of dollars by mining Bitcoin—providing a sanctions-resistant revenue stream that Tehran uses to purchase needed imports and even to fund terrorist organizations like Hamas. Iranian state-affiliated miners enjoy access to heavily subsidized electricity, effectively converting Iran's energy reserves into crypto assets. These Bitcoins can then be sold abroad for hard currency or used to pay for sanctioned imports. (The International Monetary Fund noted that sanctioned regimes can monetize energy via mining when they cannot easily export oil.)²⁴
- While U.S. sanctions prohibit providing crypto services to Iran, the pseudonymous nature of blockchain transactions makes enforcement challenging. The Trump administration has begun responding—for example, the Treasury and Justice Departments have pursued Iranian ransomware and darknet actors exploiting crypto.²⁵
- But Iran's pivot to crypto is real: by 2024, Iran reportedly handled over \$8 billion in crypto transactions despite sanctions, indicating that stricter tracking of Iranian-linked wallets and mining operations is needed.²⁶
- **Front Companies and Shadow Banking:**
 - Iran and the IRGC increasingly rely on multi-jurisdictional front company networks to obscure financial flows. These fronts facilitate both oil sales (as discussed) and procurement of sanctioned goods.
 - In March 2023, OFAC sanctioned a ring of 39 front companies across Iran, Hong Kong, China, and the UAE that formed a “shadow banking” network, moving billions for

²³ Rowan Scarpino and Jocelyn Trainer, “Sanctions by the Numbers: 2023 Year in Review,” Center for a New American Security, June 27, 2024, <https://www.cnas.org/publications/reports/sanctions-by-the-numbers-2023-year-in-review#:~:text=Following%20the%20October%207%2C%202023%2C,States%20partnered%20with%20the%20United>.

²⁴ U.S. Senators Elizabeth Warren and Angus S. King Jr. to U.S. Secretary of Defense Lloyd J. Austin III, Secretary of the Treasury Janet Yellen, and National Security Advisor Jake Sullivan, May 1, 2024, <https://www.warren.senate.gov/imo/media/doc/2024.05.01%20Letter%20to%20Treasury,%20White%20House,%20DoD%20on%20Iran%20Cryptomining.pdf#:~:text=legalized%20the%20cryptomining%20industry%20in,the%20Iranian%20government%20threatens%20our>.

²⁵ U.S. Department of the Treasury, “Treasury Sanctions Head of Online Darknet Marketplace Tied to Fentanyl Sales,” press release, March 4, 2025, <https://home.treasury.gov/news/press-releases/sb0040#:~:text=WASHINGTON%20%E2%80%94%20Today%2C%20the%20U.S.,Today%E2%80%99s>.

²⁶ Rowan Scarpino and Jocelyn Trainer, “Sanctions by the Numbers: 2023 Year in Review,” Center for a New American Security, June 27, 2024, <https://www.cnas.org/publications/reports/sanctions-by-the-numbers-2023-year-in-review#:~:text=Following%20the%20October%207%2C%202023%2C,States%20partnered%20with%20the%20United>.

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TESTIMONY BEFORE HOUSE FOREIGN AFFAIRS COMMITTEE
APRIL 1, 2025

sanctioned Iranian entities.²⁷ Since then, additional front companies have been exposed, often tied to IRGC procurement. For instance, in 2024, the U.S. designated companies in Malaysia and Hong Kong that were helping Iran acquire sensitive drone and missile components, in violation of export controls.²⁸ Such intermediaries use foreign bank accounts and false documentation to disguise that transactions ultimately benefit Iran or the IRGC.

- Just two months ago, in February 2025, OFAC took action against an international oil broker network spanning China, UAE, and India that was fronting for Iran's Armed Forces and IRGC-QF.²⁹ These designations underscore that front companies enabling Iran's evasion are now squarely in U.S. crosshairs.
- However, the proliferation of new shell companies (many in jurisdictions with lax oversight) means that sanctions enforcement often remains a game of "whack-a-mole." The emergence of false maritime registries and fictitious company identities to conceal tanker ownership is one example—a problem that grew in 2023–24 as real flag states deflagged some illicit vessels, only for sham registries to "flag" them on paper.³⁰ Vigilance and intelligence sharing on these front companies is more important than ever.
- **Regional Trade and Smuggling:**
 - In addition to large-scale oil exports, Iran has turned to regional smuggling and barter trade to generate revenue and obtain hard currency.
 - One prominent avenue is the hawala-style movement of U.S. dollars from Iraq into Iran. Throughout 2023, Iran exploited Iraq's dollar-based economy to skirt banking sanctions—Iranian-linked money traders would collect physical dollars from Iraq (often sourced from Iraqi banks or dollar auctions) and courier them to Iran or funnel them through exchange houses. The Treasury Department, in collaboration with Iraq's central bank, moved in July 2023 to ban 14 Iraqi banks from U.S. dollar transactions due to their role in illicit transfers to Iran.³¹ This crackdown has somewhat constrained Iran's access to cash dollars, but smuggling continues via unlicensed exchangers.
 - Iran has also expanded regional commerce in local currencies to bypass the U.S. financial system. For example, trade with Russia has grown under their strategic partnership. Iran sells drones and other arms to Russia for use in Ukraine, and in return may receive payment

²⁷ Rowan Scarpino and Jocelyn Trainer, "Sanctions by the Numbers: 2023 Year in Review," Center for a New American Security, June 27, 2024, <https://www.cnas.org/publications/reports/sanctions-by-the-numbers-2023-year-in-review#:~:text=Following%20the%20October%207%2C%202023%2C,States%20partnered%20with%20the%20United>.

²⁸ Financial Crimes Enforcement Network, "FinCEN Advisory to Financial Institutions to Counter the Financing of Iran-Backed Terrorist Organizations," advisory, May 8, 2024, <https://home.treasury.gov/news/press-releases/sb0015#:~:text=Sepehr%20Energy%20and%20its%20affiliate,destabilizing%20activities%20around%20the%20world>.

²⁹ U.S. Department of the Treasury, "Treasury Targets Oil Network Generating Hundreds of Millions of Dollars for Iran's Military," press release, February 6, 2025, <https://home.treasury.gov/news/press-releases/sb0015#:~:text=WASHINGTON%20%E2%80%94%20Today%2C%20the%20Department,as%20well%20as%20several%20vessels>.

³⁰ Claire Jungman and Daniel Roth, "UANI's Final Tanker Tracker of 2024: A Year in Review," United Against Nuclear Iran, January 3, 2025, <https://www.unitedagainstanucleariran.com/blog/uanis-final-tanker-tracker-of-2024-year-review#:~:text=In%202024%2C%20Iran%20exported%20587.98%20billion%20barrels%20of%20oil>.

³¹ David S. Cloud, "U.S. Bans 14 Iraqi Banks in Crackdown on Iran Dollar Trade," *Wall Street Journal*, July 19, 2023, <https://www.wsj.com/articles/u-s-sanctions-14-iraqi-banks-in-crackdown-on-iran-dollar-trade-33ef9f35>.

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TESTIMONY BEFORE HOUSE FOREIGN AFFAIRS COMMITTEE
APRIL 1, 2025

in rubles, gold, or commodities.³² Likewise, Iran trades with neighbors like Afghanistan and Syria through informal networks, exchanging fuel, minerals, and goods in deals outside of SWIFT.³³ While these barter trades are not all high-value, they do provide incremental revenue and supplies.

- Smuggling of refined petroleum products has also spiked. Iran's heavily subsidized gasoline is trafficked overland by tanker truck into Pakistan and Afghanistan, where it's sold for profit. A Reuters investigation in mid-2023 found over 1,000 tanker trucks were carrying Iranian fuel across Iran's borders daily, amounting to as much as 200,000 bpd of diesel and other fuels being smuggled for regional sale.³⁴
- Finally, gold and precious metals remain a tool: Iran has revived schemes to trade energy for gold (as it infamously did with Turkey earlier last decade).³⁵
- Each of these streams—dollars siphoned from Iraq, sanctioned weapons sales, fuel smuggling, and barter in gold—has grown more important as formal sanctions tightened on Iran's banks.

Regime Behavior and Nuclear Calculations

Finally, we must consider how current sanctions enforcement influences Iran's internal calculations. When Iran was allowed to export oil relatively freely in 2022–23, its leadership had little incentive to compromise on U.S. concerns—Tehran's economy stabilized, the currency strengthened off its lows, and the regime could fund repression at home and adventurism abroad without facing economic collapse. This likely emboldened Iran to take a harder line in nuclear negotiations, as evidenced by stalled talks and Iran's acceleration of uranium enrichment to 60 percent.

Now, facing renewed financial pressure, Iran's regime faces a dilemma: either come back to the negotiating table in earnest or watch its financial position deteriorate significantly. Properly enforced oil sanctions could cost Iran tens of billions of dollars in lost revenue per year, shrinking its GDP and straining its budget (over half of which relies on oil).

Historically, Iran's leadership has shown flexibility when economic crisis looms. For instance, Iran agreed to nuclear talks in 2013 when sanctions bit hard, and again showed interest in diplomacy in late 2019 under maximum pressure. The current administration's posture may similarly force Iran to recalculate.

Of course, a cornered regime could also act out in the short term. For example, Iran might harass shipping in the Persian Gulf or encourage proxies to attack U.S. assets regionally as retaliation for sanctions. We have seen episodic tanker seizures by Iran, such as the Spring 2023 incidents where Iran seized vessels in the Gulf of Oman in response to American oil confiscations. The U.S. must be prepared to deter and respond

³² "Russia, Iran Poised for Trade Surge, Cultural Expansion Following Strategic Partnership Treaty," *Tehran Times*, March 10, 2025, <https://www.tehrantimes.com/news/510779/Russia-Iran-poised-for-trade-surge-cultural-expansion-following>.

³³ Hamidreza Azizi and Julien Barnes-Dacey, "Beyond Proxies: Iran's Deeper Strategy in Syria and Lebanon," European Council on Foreign Relations, June 5, 2024, <https://ecfr.eu/publication/beyond-proxies-irans-deeper-strategy-in-syria-and-lebanon/>.

³⁴ Maha El Dahhan and Yousef Saba, "Fuel Oil Smuggling Network Rakes in \$1 Billion for Iran and Its Proxies," Reuters, December 3, 2024, <https://www.yahoo.com/news/fuel-oil-smuggling-network-rakes-041056356.html>.

³⁵ "Iran Cuts Gold Import Tariff to Zero," Press TV, January 15, 2025, <https://www.presstv.ir/Detail/2025/01/15/740965/Iran-gold-imports-tariff-cut-sanctions>.

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TESTIMONY BEFORE HOUSE FOREIGN AFFAIRS COMMITTEE
APRIL 1, 2025

to any Iranian escalation linked to sanctions enforcement. A stronger naval presence and multilateral security for commercial shipping can blunt Iran's leverage. Notably, however, if Iran escalates militarily, it only strengthens the case for keeping sanctions tight.

On the nuclear front, the administration's stance implies that there will be no sanctions relief for Iran's regime without dismantling its nuclear program. This is the correct approach. This kind of deal will only be attainable after a significant U.S. pressure campaign, which robust sanctions enforcement provides.

In total, since October 7, 2023, the U.S. has issued well over a dozen tranches of Iran-related sanctions designations, hitting terrorist financiers, IRGC-QF oil operatives, front companies, banks, transport networks, and even buyers. All these actions are interlinked: they aim to systematically disrupt Iran's financial support for terrorism and nuclear proliferation by targeting the money flows at their source (oil sales) and along their pathways (banking, crypto, smuggling). Treasury officials have indicated this campaign will continue so long as Iran pursues its current course. I applaud these efforts—particularly the more recent willingness to confront complicity by actors in China and elsewhere. Such resolute enforcement was long overdue. As we stand today, Iran's leadership faces a fundamentally altered risk calculus: the high oil export volumes and sanction evasion enjoyed over the past few years can no longer be taken for granted.

Where Do We Go From Here?

Given the evolving landscape described, I offer the following recommendations to sustain and strengthen the sanctions regime against Iran's illicit oil revenues and associated networks. These proposals are aligned with the administration's renewed "maximum pressure" posture as of 2025 and are intended to close remaining gaps in enforcement while mitigating unintended consequences:

Aggressively Enforce Oil Export Sanctions to Drive Iran's Oil Revenues Toward Zero:

- The U.S. should continue—and accelerate, if possible—its campaign of identifying and sanctioning entities involved in Iranian oil exports. This means sustained, regular designations of the remaining vessels in Iran's ghost fleet and the network of brokers and facilitators that support them. The U.S. should aim to designate every known ghost fleet tanker within the next year, in coordination with allies. This will complicate Iran's ability to insure and maintain these ships, and flag states will be under pressure to strike them from registries. Moreover, extending sanctions to any entity providing services to those vessels—such as insurers, classification societies, and ship management companies—will further impair the fleet's operations.
- The administration's willingness to sanction a Chinese end-user (the Luqing refinery) is a strong signal. Washington should similarly not hesitate to sanction international commodity traders or banks if they knowingly facilitate Iranian oil trades. The recent sector determination under Executive Order 13902 means any person operating in Iran's petroleum sector is fair game for sanctions. OFAC and State should wield this authority robustly—for example, by issuing an alert that even refiners in countries like China or India could face sanctions if they process Iranian oil. The goal should be to make Iran's oil so toxic commercially that even clandestine buyers retreat. While zero exports may be unrealistic as long as some countries remain defiant, the U.S. should pursue the past policy objective of getting as close to zero as possible. Every 100,000 barrel reduction in Iran's exports costs the IRGC millions of dollars.

Target the Enablers: Flag States, Registries, Ports, and Shipping Services:

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TESTIMONY BEFORE HOUSE FOREIGN AFFAIRS COMMITTEE
APRIL 1, 2025

- Iran's oil smuggling enterprise depends on complicit or lax jurisdictions that provide flags for ships, registries, crewing, and ports for transshipment. The U.S. must increase pressure on these enabling nodes. Diplomatic engagement is one tool. For example, Panama's flag registry notoriously once flagged nearly half of Iran's ghost fleet. In 2024, Panama at long last stepped up de-flagging efforts—removing 133 vessels from its registry—amid growing congressional and administration scrutiny, much of it informed by UANI's tracking and advocacy. However, Panama also added new vessels linked to Iran, highlighting the need for sustained pressure. The U.S. should send a clear message to Panama—and other flags of convenience like the Comoros, Gabon, Palau, and the Cook Islands—that continued registration of Iranian sanction-evading ships will result in consequences. This could include sanctioning the maritime authorities or companies responsible for these flags if they knowingly register ghost fleet vessels. Congress may consider legislation conditioning foreign aid or trade benefits on cooperation in shipping enforcement. Additionally, the U.S. could threaten to ban persistently non-compliant flag states' vessels from U.S. ports—a drastic step, but one that would get attention. Even if not immediately implemented, this threat could incentivize better behavior.
- Beyond flags, false registries that have emerged (essentially fraud operations that claim to register vessels under non-existent or uninvolved states) must be dismantled. The U.S. should work with the International Maritime Organization (IMO) and Interpol to expose and shut down fake registries—potentially via an IMO resolution that no ship will be recognized as legally registered without verifiable registry documentation directly from the purported flag state.
- Another enabler is ports that host transshipments of Iranian oil. Malaysia's waters near the Riau Archipelago have become a hotspot for ship-to-ship transfers of Iranian (and Venezuelan) oil. The U.S. should encourage Malaysia to police and curtail these operations, offering technical help to monitor its exclusive economic zone for dark activities. If progress is not seen, sanctions on port operators or storage facilities in Malaysia or elsewhere that knowingly store or handle Iranian oil should be on the table. We have precedent—the State Department's March 2025 designation of a Chinese storage terminal (Huizhou Bay) for holding Iranian oil was an assertive move. Similar action could be taken against any port facility in the Middle East or Asia that emerges as an Iranian oil hub (for instance, some Iranian oil has been suspected to go to the UAE's Fujairah storage in the past).
- Finally, the U.S. should widen the net on maritime service companies: insurers (P&I clubs), classification societies, bunker fuel suppliers, and shipping management firms that service Iran's fleet. Many reputable firms exited Iran's trade long ago, but some smaller or obscure ones may still partake. If they facilitate sanctioned oil movements, add them to the SDN list. Cutting off insurance in particular can sideline a tanker (as it cannot enter many ports without insurance). The bottom line is to make every link of Iran's illicit oil supply chain—from flagging to port call—a point of vulnerability for Iran through targeted pressure.

Expand Maritime Interdiction and Seizures on the High Seas

- Increase interdictions of Iranian oil tankers on the high seas, particularly those operating under false flags or conducting deceptive shipping practices like ship-to-ship (STS) transfers in international waters. The U.S. Navy and allied maritime coalitions (e.g. CTF-153 or EU NAVFOR) should be empowered to board, inspect, and detain suspect vessels, especially in chokepoints like the Strait of Hormuz, Bab el-Mandeb, and the Strait of Malacca. Legal authorities under the U.S. National Defense Authorization Act and multilateral frameworks (e.g., the Proliferation Security Initiative) can support this. Each seized tanker not only removes oil from Iran's books but deters others from participating.

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TESTIMONY BEFORE HOUSE FOREIGN AFFAIRS COMMITTEE
APRIL 1, 2025

- Expand deployment of AI-enhanced maritime surveillance tools to detect Iranian ghost fleet activity in near real time. This includes pattern recognition of STS transfers, AIS manipulation, unusual port calls, or use of high-risk flags. Treasury and DoD can collaborate with commercial satellite providers to create a centralized watchlist of deceptive tankers and cross-reference it with sanctions data.
- Use predictive analytics to pre-designate vessels likely to be used for sanctions evasion before they are deployed. If a recently purchased tanker is registered to a shell company in a known evasive jurisdiction and immediately disables or manipulates its transponder in the Persian Gulf, OFAC should fast-track designation.

Establish a Global Maritime “No Dock” List for Sanctioned Tankers:

- Build on the concept of financial de-risking by encouraging a coalition of ports and private terminal operators to voluntarily refuse service to designated or high-risk vessels. This would operate like a maritime “no-fly list”—tankers flagged by the U.S. as IRGC-linked or engaged in oil smuggling would be barred from receiving docking, bunkering, or maintenance services at any participating port. The U.S. could encourage this through both diplomacy and disincentives, such as limiting U.S. port access or insurance market participation to compliant entities.

Enhance Global Coordination and Intelligence Sharing:

- Sanctions work best when the international community is unified. The U.S. should build on the cooperation seen with allies in late 2023 and form a more formalized “Iran Illicit Finance Enforcement Task Force.” This could involve G7 countries plus key regional partners (e.g., Gulf states, Singapore, South Korea) coordinating intelligence and enforcement actions against Iranian evasion. One model is the coordination mechanism used for the Russia sanctions and price cap (regular info exchange on evasion). For Iran, such a forum could facilitate real-time sharing of tanker tracking data, financial intelligence on front companies, and cryptocurrency wallet information linked to Iran. The aim is to ensure that once the U.S. takes action, allies quickly follow with their own measures, closing off alternative avenues. For instance, after the U.S. sanctioned an IRGC front in Hong Kong, allied financial centers should also freeze any of its assets. The task force could also collectively engage countries like the UAE or Oman that might be used as transshipment or smuggling points, offering a unified diplomatic message and assistance to crack down.

Strengthen Measures Against Iran’s Cryptocurrency and Cyber Finance Evasion:

- As Iran leans into crypto to bypass sanctions, U.S. policy should adapt accordingly. If specific mining facilities or operators (including foreign equipment suppliers) can be identified, the Office of Foreign Assets Control (OFAC) should designate them, and the U.S. should work with mining equipment makers to ensure no new technology goes to Iran. OFAC and DOJ should continue to pursue exchanges worldwide (many are in regions like the Middle East or former Soviet states) that Iranian users rely on. If those exchanges have a U.S. nexus or use American technology, enforcement action (fines or shutdowns) is warranted. Treasury might also consider adding specific Iranian crypto wallet addresses to the sanctions list, as was done for North Korean hacking wallets—this makes it easier for exchanges to block those funds. On the technology side, the U.S. government should invest in blockchain analytics capabilities and partner with leading crypto-tracing firms to track Iranian illicit crypto flows in real time. This will aid in identifying when, for example, a IRGC-affiliated wallet tries to cash out cryptocurrency via an exchange. Additionally, expanding information sharing with Israel (which has

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TESTIMONY BEFORE HOUSE FOREIGN AFFAIRS COMMITTEE
APRIL 1, 2025

keen insight on Hamas/Iran crypto) and other allies will improve collective attribution of illicit crypto accounts to Iran.

Leverage Secondary Sanctions and Congress's Voice:

- The credible threat of U.S. secondary sanctions often influences foreign companies' choices even if not yet applied. The Administration should fully enforce existing secondary sanctions authorities—for example, the Countering America's Adversaries Through Sanctions Act's (CAATSA) Section 228, which allows sanctions on foreign financial institutions that facilitate significant transactions for Iran's Revolutionary Guards or sanctioned entities. This could be used against, say, banks in third countries that are still clearing payments for Iranian oil through cut-outs. Congress can assist by conducting oversight and highlighting foreign sanction evaders, effectively shining a spotlight that can deter ongoing trade with Iran. I suggest that Congress require frequent public reporting on Iran's oil export levels and sanction evasion networks, perhaps quarterly. This transparency will reinforce pressure on the Administration to meet enforcement benchmarks and will signal to foreign governments that Congress is watching their compliance.
- Furthermore, Congress should be prepared to pass new legislation if needed to close gaps—for instance, a law mandating sanctions on any entity/vessel insured by Iranian insurers (to hit Iranian insurance companies stepping in to cover the ghost fleet). Bipartisan resolve on this issue is strong; demonstrating that unity will strengthen the U.S. negotiating hand. On the flip side, Congress should make clear that sanctions relief will not be granted lightly—only meaningful, verifiable changes in Iran's behavior (such as a durable rollback of its nuclear program and cessation of terrorist financing) would warrant considering any easing. This clarity will disabuse Tehran of hopes that it can wait out sanctions or split Washington's resolve. Instead, Iran's leaders must feel that their only way to save their economy is to genuinely alter course. Secondary sanctions and a united Congress serve as force multipliers to the Executive's efforts, and I encourage maintaining them.

Looking ahead, sanctions must remain central—but they cannot operate in a vacuum. United Against Nuclear Iran (UANI) emphasized this reality in its “100 Day Recommendations” to the Trump administration, underscoring that a successful strategy toward Iran requires a comprehensive, whole-of-government approach. This must combine diplomatic engagement, public messaging, military preparedness, and economic pressure to reshape the regime's cost-benefit calculus.

To reestablish deterrence, the United States should respond firmly to Iranian aggression—including that carried out by proxies like the Houthis—by holding Tehran directly accountable. This includes the option of targeted strikes on IRGC military assets inside Iran to impose costs for continued attacks on U.S. interests and partners.

Most critically, the U.S. must reject any return to the flawed JCPOA framework. Tehran is attempting to steer negotiations toward a slightly modified version of the 2015 deal. That is the wrong paradigm. The right approach is one that insists on the complete dismantlement of Iran's nuclear program—including its uranium enrichment infrastructure, weaponization activities, and strategic missile capabilities.

Only a decisive, unified, and pressure-based posture, backed by real enforcement and credible consequences, will compel meaningful change in Iran's behavior. We must make clear that the era of temporary deals and unenforced red lines is over. Iran must face a binary choice: reverse course—or face economic isolation and deterrent force.

Mr. LAWLER. Thank you, Ms. Jungman.
I now recognize Ms. Stroul for her opening statement.

STATEMENT OF DANA STROUL

Ms. STROUL. Chairman Lawler, Ranking Member Meeks, and distinguished members of the committee, thank you for the opportunity to testify today.

Let me associate myself with Mr. Roule; the Iranian regime is on its back foot. The pillars of its security strategy—the nuclear weapons program, the network of terrorists and proxies, and the conventional missile and drone arsenal—are more vulnerable today than at any time in the history of the regime, making 2025 a decisive year.

In the aftermath of Hamas' attack, Israel, with U.S. support, dismantled Iran's proxy network in Gaza, Lebanon, and elsewhere, disrupting the regime's ability to project power through asymmetric capabilities.

In Syria, Tehran lost its regional strategic partner with the ouster of Bashar al-Assad, who permitted the use of Syrian territory for Iranian terror.

From the validation of a U.S.-led regional air defense coalition in April of last year to Israel's defeat of a large-scale ballistic missile attack last October, we now know that Iran's complex conventional attacks and missile threats can be defeated. Israel's strikes inside Iran targeted key missile production facilities and degraded its strategic air defense systems.

In addition, the regime is under economic and social pressure. The sanctions architecture from the 2019 maximum pressure campaign remains in place and has been strengthened.

The window is open for the United States to work with its partners and advance opportunities in a region no longer held back by Iran's nefarious influence. To emphasize, this is a window of opportunity. How the United States proceeds in the coming months will determine whether a more stable and secure region emerges from the post-October 7th environment.

In the coming months, the administration should test Tehran's willingness to reach a diplomatic agreement, while also preparing to set the nuclear weapons program back through military means. A good deal, as National Security Advisory Waltz emphasized, would be one that permanently blocks Iran from obtaining a nuclear weapon rather than just delaying its capability.

Yet, the time window to test Iran's openness to negotiate is short, partly due to the looming October expiration of remaining U.N. Security Council restrictions and, also, because of Iran's current exposure to military strikes.

Policymakers should assume that Russia and China will help Iran rebuild its military capacity and air defenses. Moscow and Beijing are already supporting Tehran diplomatically. So, Washington will need to prepare for a complex negotiation in which these powers do not contribute to a diplomatic process like they did as part of the P5+1.

The following steps will strengthen the U.S. hand as it pursues a negotiated settlement:

The administration can incentivize Iran to negotiate by articulating how sanctions relief would be structured if Iran dismantles its nuclear weapons program.

The administration must keep its military options open by maintaining a robust U.S. military posture in the region; strengthening regional air and missile defense capabilities, and reinforcing America's commitment to deterring Iranian aggression against Israel and Arab allies.

Congress can begin the process to conditionally authorize the use of military force against Iran's nuclear program if the regime proves unwilling to quickly take sufficient steps.

Consultations with allies and partners, particularly in the Middle East and Europe, will ensure a unified approach to countering Iran, reinforce the legitimacy of any negotiated settlement, and maintain pressure on Tehran. This will be crucial to blunting spoiler policies from Russia and China.

Engaging regional leaders is also essential for preventing Iran from reconstituting its threat network. Providing military assistance and intelligence-sharing to partners will enhance their ability to counter Iran.

Restoring assistance to emerging leaders, while pressing for reforms, particularly in Lebanon and Syria, can further incentivize cooperation, ensuring they remain resilient against malign Iranian influence.

In Yemen, the administration should ensure that its current air campaign exclusively targets military assets of the Houthis and mitigates civilian harm, while seeking ways to support the Yemeni people.

Increasing maritime and overland interdiction efforts will prevent Iran from resupplying the Houthis.

Additionally, working closely with the Saudis and Emirates on a political process aimed at ending Yemen's civil war will create a pathway for peace and stability.

In conclusion, real opportunities exist to block Iran from pursuing a nuclear weapons capability and consolidate military gains against its destabilizing activities. To press the advantage, the United States must be prepared to bring more to the table.

Military force and sanctions are critical elements of strategy, but insufficient on their own. The United States must lean into diplomacy as well, testing the possibility of a negotiated settlement, while supporting new leaders across the region that oppose Tehran's interest in rebuilding its axis of resistance.

Thank you.

[The prepared statement of Ms. Stroul follows:]



A Return to Maximum Pressure: Comprehensively Countering the Iranian Regime's Malign Activities

Dana Stroul
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The Washington Institute for Near East Policy

Testimony submitted to the U.S. House Committee on Foreign Affairs
April 1, 2025

Chairman Mast, Ranking Member Meeks, and distinguished members of the House Foreign Affairs Committee, thank you for the opportunity to testify on U.S. policy to counter Iran's destabilizing activities. In my view, the window is open for the United States to work with like-minded partners to advance opportunities in a region no longer held back by Iran's nefarious influence. To emphasize, this is a window of opportunity: how the United States proceeds in the coming months will determine whether a more stable and secure Middle East emerges from the post-October 7 environment. To press the advantage, Washington must be prepared to bring more to the table than pressure. Military force and sanctions are critical elements of strategy but insufficient on their own. The United States must lean into diplomacy as well, testing the possibility of a negotiated settlement that can prevent Iran's nuclear program from delivering weapons while also supporting new leaders across the region that oppose Tehran's interest in rebuilding its "axis of resistance." To implement a comprehensive strategy, the United States will need to empower its diplomats, work with allies and partners, restore assistance and stabilization programs, and maintain a robust military posture and security commitments across the Middle East.

Iran's strategy for regime survival has relied on decades-long investments in three key areas: (1) the nuclear weapons program, (2) its threat network of terrorists and proxies, and (3) its conventional missile arsenal. Tehran has used each of these pillars to threaten its neighbors, challenge Israel's existence, and try to push the United States out of the region, all in the pursuit of imposing its will and vision on the Middle East.

Regional developments since October 7, 2023, have significantly reshaped the regional threat landscape. In the aftermath of Hamas's attack, Israel, with U.S. support, has systematically dismantled Iran's proxy network in Gaza, Lebanon, and elsewhere, disrupting the regime's ability to project power by funding, arming, and training nonstate groups. In Syria, Tehran lost its one Middle East strategic partner with the ouster of Bashar al-Assad, who had willingly permitted the use of Syrian territory for destabilizing Iranian activities. As a result, Tehran's ability to exert asymmetric pressure through its regional proxies has been greatly reduced. New leaders in Damascus and Beirut alike are

working to stabilize their countries and do not want them to be dominated by Tehran. In Gaza, Palestinians have taken to the streets to protest against Hamas, signaling some resistance to the group's stranglehold on governance. These new leaders and movements on the ground will need long-term assistance and support.

The combination of Israel's offensive strikes inside Iran and U.S.-led defensive action in the region has lowered the fear barrier in confronting Iranian aggression. From the emergence of a U.S.-led regional air defense coalition in April 2024 to Israel's defeat of a large-scale ballistic missile attack in October, allies have demonstrated that Iran's complex conventional attacks and missile threats can be effectively countered. Israel's strikes inside Iran targeted key missile production facilities, disrupting the regime's ability to replenish critical components of its arsenal and degrading its strategic air defense systems. Tehran's military infrastructure is now exposed to future military action. These developments not only altered Iran's deterrence posture, but also reinforced the credibility of integrated air and missile defense networks in mitigating threats posed by state and nonstate actors in the region.

To build on this, the United States will need to prioritize the operational integration of partner air defenses across the region, which includes accelerating foreign military sales, providing security assistance funding, and prioritizing defense diplomacy. Washington will also need to maintain an increased military posture across the region in the medium term as the operational backbone for integration and deterrence.

In addition to its losses abroad, the regime is under pressure at home due to years of mismanagement, corruption, and sanctions. The sanctions architecture from the 2019 "maximum pressure" campaign remains in place and has been strengthened. Recent economic indicators reveal significant damage, including rising inflation, a depreciating currency, and growing fiscal deficits that limit the regime's ability to fund both domestic priorities and malign foreign activities. The economy and infrastructure are in crisis, with the rial losing half its value in just eight months and food prices soaring (e.g., the cost of potatoes rose 217 percent over the past year). Widespread power outages now affect twenty-one out of thirty-one provinces, while a worsening water crisis—driven by drought and climate change but largely blamed on government mismanagement—has turned into a national emergency. In a sign of growing regime anxiety over public unrest, authorities have temporarily paused full implementation of the draconian hijab and chastity bill and are releasing Green Movement leaders after fourteen years of house arrest. Yet continued protests are inevitable in light of the systemic corruption and persistent repression. In sum, Tehran is struggling to stabilize the economy while facing increased domestic unrest and challenges in sustaining its regional influence.

Yet sanctions alone cannot stop Iran's nuclear program. In the past, the regime responded to economic pressure by taking provocative nuclear steps or attacking the interests of its neighbors. Today, it is perilously close to crossing the nuclear weapons threshold. Rafael Grossi, the director-general of the International Atomic Energy Agency (IAEA), has expressed significant concern over Iran's uranium enrichment activities, stating that it is "pressing the gas pedal" by dramatically accelerating enrichment to near weapons-grade levels. He highlighted that Iran's production of uranium enriched to 60 percent purity has increased from approximately seven kilograms per month to over thirty, emphasizing that the Islamic Republic is the only non-nuclear-weapons state producing uranium at this high level of enrichment, which he finds "[seriously concerning](#)."

Since the United States withdrew from the Joint Comprehensive Plan of Action (JCPOA) in 2018, Iran has significantly advanced its nuclear capabilities. It has expanded its stockpile of high-enriched uranium and is now producing fissile material at enrichment levels and in quantities far beyond the

JCPOA's original limits. Additionally, it has installed and operated advanced centrifuges at key facilities such as Natanz and Fordow, increasing the rate of enrichment and shortening its capacity to stage a quick breakout. The regime has also restricted international oversight by limiting cooperation with the IAEA, reducing transparency over its nuclear activities. As my Washington Institute colleague Michael Singh [pointed out](#) in a recent paper for the Trump administration, Iran could have sufficient weapons-grade uranium for a weapon in just days and could produce a usable weapon in six months or less.

Although Director of National Intelligence Tulsi Gabbard [recently testified](#) that Iran is not actively pursuing a nuclear weapon at this time, the U.S. intelligence community [has warned](#) for the past year that regime nuclear experts are engaging in activities that better position Tehran to develop a nuclear device should the leadership decide to do so. These activities include work on uranium metal production, which has direct weapons applications, and advancements in explosive technologies relevant to nuclear warhead development. While Iran insists that these measures are for civilian energy and research purposes, the pattern of activity suggests that it is methodically reducing the time needed to weaponize if it chooses to move in that direction. The intelligence community has long assessed that Tehran's decisionmaking is the only thing precluding a breakout, not any technical inhibition. A crucial question for this hearing, therefore, is whether we can keep Iran from making that decision.

President Trump has indicated that while economic and military pressure will continue, his preferred path for addressing Iran's nuclear ambitions remains diplomacy and negotiation. As the administration considers potential talks, it must address several questions. The first is the scope of any agreement—whether negotiations will focus solely on the nuclear program (as with the 2015 JCPOA) or seek a more comprehensive deal that also addresses support for terrorist organizations, proxy militias, and the missile, space-launch, and drone programs. Second, the administration must decide whether to pursue a unilateral negotiation strategy or engage in a multilateral framework involving key allies such as Israel, European partners, and Gulf states. A multilateral approach could enhance enforcement mechanisms and diplomatic legitimacy, but it would also slow the process.

A good deal, as National Security Advisor Mike Waltz has emphasized, would be one that permanently blocks Iran from obtaining a nuclear weapon rather than just delaying its capability. It must include consistent, regular inspections to ensure full transparency and prevent the regime from exploiting loopholes. The Trump administration should prioritize testing Tehran's willingness to reach a diplomatic deal on the nuclear program while also preparing to set the program back through military means should diplomacy fail.

Yet the time window to test Iran's openness to negotiate is short, partly due to the looming October expiration of remaining restrictions on the nuclear program via UN Security Council Resolution 2231, and also because of Iran's current exposure to Israeli military strikes. Policymakers should assume that Russia and China will work with Iran to rebuild its military-industrial capacity and air defenses, limiting the scope of what can be achieved through military strikes beyond the near term. Moscow and Beijing are already supporting Tehran diplomatically, so Washington will need to prepare for a complex negotiation in which these powers do not contribute to a diplomatic process like they did as part of the P5+1. Also unclear is how Russia and China would respond should Iran decide to weaponize.

To strengthen the U.S. approach toward Iran, the administration needs a hard-nosed diplomatic plan backed by economic and military leverage:

- To effectively signal U.S. resolve in pursuit of an agreement, the administration should clearly articulate how sanctions relief would be structured if Iran dismantles its nuclear program and exports key elements out of the country. A well-defined framework for phased economic relief would provide clarity on the benefits of compliance. This is also an area where Congress can contribute.
- At the same time, the administration must continue taking steps to keep its military options open. This includes maintaining a robust U.S. military presence in the region, strengthening regional air and missile defense capabilities, and reinforcing America's commitment to deterring Iranian aggression against Israel and Gulf allies. The recent announcements about sending a second aircraft carrier to the region and deploying B-2 bombers to Diego Garcia are important steps in reinforcing U.S. readiness to use military force.
- Congress can further strengthen the administration's hand by beginning the process to conditionally authorize the use of military force against Iran's nuclear program if the regime proves unwilling to take sufficient steps to ensure that it will not acquire nuclear weapons.
- The United States must closely coordinate with its allies and partners, particularly in the Middle East and Europe, to ensure a unified approach to countering Iran. Strong engagement with European allies will help reinforce the legitimacy of any negotiated agreement and maintain transatlantic pressure on Tehran. Likewise, consultation with key Middle Eastern countries, including Israel and the Gulf states, is essential to aligning regional security strategies and preventing Iran from exploiting divisions between partners. This engagement will be crucial to blunting spoiler policies from Russia and China.
- Engaging regional leaders is essential to consolidating military gains against Iran and preventing it from reconstituting its threat network. Providing military assistance and intelligence-sharing to partners will enhance their ability to counter Iran's influence and contribute to stability. Restoring assistance to emerging leaders while pressing for reforms—particularly in Lebanon and Syria—can further incentivize cooperation and support their long-term development, ensuring they remain resilient against destabilizing Iranian efforts. Assistance provision and diplomatic engagement should be coordinated with European and Arab allies.
- To pressure the Iran-backed Houthis in Yemen, the administration should ensure that its current air campaign exclusively targets Houthi military assets and mitigates civilian harm, while actively seeking ways to support the Yemeni people, including humanitarian aid and reconstruction efforts. Increasing maritime and overland interdiction efforts will prevent Iran from resupplying the Houthis, limiting their ability to wage prolonged conflict. Additionally, working closely with the Saudis and Emiratis on a political process aimed at ending Yemen's civil war will create a pathway for peace and stability in the region.

In conclusion, the executive and legislative branches can take a number of steps in the coming months to better position the United States to take advantage of regional opportunities. Real opportunities exist to block Iran from pursuing a nuclear weapons capability and consolidate military gains against its destabilizing activities. To do this, the United States must fully resource all elements of its national power and apply them to the Middle East: not only military operations and sanctions, but also assistance, stabilization, and diplomacy.

Mr. LAWLER. Thank you, Ms. Stroul.

I now recognize myself for 5 minutes of questioning.

Last year, two of my bills that became law targeted Iran's oil trade. The SHIP Act gave the President the authority to sanction foreign ports and refineries that processed illicit Iranian oil, and the Iran-China Energy Sanctions Act allowed for sanctions against Chinese financial institutions that processed transactions involving Iranian oil.

And I'm currently working on legislation that further expands sanctions authority, the Iran Enhanced Sanctions Act. Anyone or any entity that knowingly facilitates the Iranian oil trade will be found and cutoff until they are no longer doing so.

Ms. Jungman, just over a week ago, the President sanctioned the Luqing Refinery in China under the SHIP Act authorities. Have we seen any impact since this recent designation, and do you believe this designation and the Trump administration's clear intent to enforce more of these types of sanctions may deter other refineries from continuing to accept Iranian oil?

Ms. JUNGMAN. Chairman Lawler, thank you for your question, and thank you for your work on the SHIP Act and associated acts.

I do think that the first designations here on this refinery, it's still a little bit too soon to see an impact, given that it was only, you know, a week or so ago. But we need more of these. One refinery designated doesn't have a big impact. Iran is going to move its oil to be offloaded at another refinery. We need to continue the pressure. We need to continue the designations on the refineries and it shouldn't be piecemeal. It needs to all happen at once in order to really cut the lifeline.

Mr. LAWLER. Last week, reporting indicated that U.S. naval forces stopped a group of oil tankers in the Gulf. While originally thought to be Iraqi origin, they were found to be using forged Iraqi documents and the tankers were Iranian.

This instance really raises the larger issue of this being a consistent problem in the Gulf. So, what do you believe we are doing now to stop vessels from obscuring their origin? And how our are allies and strategic partner countries like Iraq helping us? And what more can be done?

Ms. JUNGMAN. Unfortunately, I don't think our strategic partners are doing enough here. I think we need to have more diplomatic engagement with them and encourage them to try to stop these associated activities.

We see Malaysia, Singapore, Iraq, Amman; these are all serving as hubs for Iran to blend its oil, rebrand its oil, and again, continue the lifeline of the oil to be exported. So, we need to continue pressure on them and encourage more diplomatic efforts from them.

Mr. LAWLER. Mr. Roule, you mentioned in your opening statement that it's important to demonstrate the credibility of a U.S. military offensive, should Iran undertake nuclear weaponization in the future. What alternatives to diplomacy would you recommend in attempting to constrain Iran's nuclear program? And what other factors need to be considered before any decision is made to pursue one of these.

Mr. ROULE. Diplomacy, of course, should remain our primary route, and the President has appropriately made this the forefront

of his approach to the Iranians and engaged with our partners. The Iranians must understand, if they complete the final steps, that we will take that military final approach as well.

There needs to be more action done to prevent Iran from acquiring the materiel they need to complete those last steps, and we need to make sure that our partners who are providing that equipment—the Chinese or the Europeans—shipping lines are punished severely, as they move that material.

But in the end of the day, Iran has pretty much everything it needs to complete those last steps for its nuclear program. Unfortunately, the can has been kicked down the road for many years and we are at the end of the road. So, it's up to the Iranians to take those last steps, and they either come to a deal or they must face nuclear reaction—nuclear response, military response.

Mr. LAWLER. So, given that the can has been kicked down the road, what factors, in your estimation, need to be considered before any decision is made to pursue a non-diplomatic response?

Mr. ROULE. The location of the nuclear material. The IAEA has lost track of some aspects of Iran's program because Iran no longer provides full access to its production of centrifuge equipment.

We need to make sure we understand exactly where all of Iran's sites are located, so that Iran simply doesn't reproduce its program in an alternative facility.

And in the end, even if there is a military strike, sir, we've got to make sure the Iranians understand our intent in the long term is to prevent reconstruction, or simply, we are going to be the process. So, it has got to be an international approach that says, with the United States and its partners, we are not going to tolerate Iran building a nuclear weapon.

Mr. LAWLER. Thank you.

I now recognize Ranking Member Meeks for 5 minutes.

Mr. MEEKS. Thank you.

Ms. Stroul, let me just go to you first. Thank you for your service to our country.

And I said in my opening remarks that there's more to be done to try to bring Iran and the United States to the table to negotiate the core issues of concern here, which is Iran's nuclear program, because of that tough assignment.

But I also believe that, you know, when I look at it thus far, Iran's response has been that they reject talks with the United States, but has left the door open to multilateral diplomacy. And what was important for me at the time of negotiating the JCPOA was that it was a multilateral agreement. There were things that were going on in negotiations that our allies wanted; that's how we got the agreement, because we figured it wouldn't be just us by ourselves. So, as Mr. Roule just said, getting them in, so that we could box Iran in, because it is not just the United States; it is the United States and our allies, which I think is important.

And then, also, I think some credibility has been gone from the United States when we unilaterally pulled out and the other allies stayed in and wanted to work something together. So, there's a lack of trust that then develops, you know, in that regard on both sides.

So, how do you think we could build some confidence with our adversary Iran, so that we could begin negotiations? And how do we bring back a diplomatic track with our allies, so that we are not by ourselves? I think Mr. Roule just talked about how significant and important that it is. How do you think that we can do that?

Ms. STROUL. Thank you so much for this question.

I couldn't agree with you more that we have seen in the past Iran has been willing to negotiate when it feels diplomatic isolation, coupled with economic pressure and the threat of military force.

Right now, we have tremendous sanctions pressure, and I believe there is a credible threat of military force on the table. And there is a unilateral offer to negotiate from President Trump, but what is missing is this multilateral element.

So, first of all, there is an eagerness in some of our previous partners from the P5+1, specifically, in Europe, to begin coordinating with Washington as soon as possible ahead of this deadline in October, later this year, when the remaining restrictions on Iran's nuclear program expire. Our European allies—and they are still our allies—are very interested in negotiating, in aligning with us in order to have a unified front approaching Iran.

Second, we have been using and relying on partners in the Middle East to pass messages to Iran and receive messages from Iran. I think that is very important, but our partners in the Middle East also need to have confidence that, if the Iranians lash out and threaten them or use military force against them, like we saw in the 2015 situation, that Washington is going to have their back and be willing to put security guarantees on the table and support their defense, just as the United States has done for Israel in supporting its defense.

One is clarifying our commitment to our partners' defense. Two is making a meaningful and genuine effort to include them and consult with them on these talks. That will also strengthen any negotiation on the other side.

Mr. MEEKS. Thank you.

And this is to you again, Ms. Stroul and Mr. Roule. Hopefully, we will have time to get both of you.

Could you maybe tell us about the challenges that it would be in setting back the Iranian nuclear program militarily? Would there be any challenges? Are there challenges there? Mr. Roule? Ms. Stroul?

Ms. STROUL. I will try to do 20 seconds and hand it over to Mr. Roule.

So, the greatest challenge is that you cannot bomb away knowledge. Iran has mastered the cycle of nuclear fuel enrichment. And we know, based on intelligence community reporting in an unclassified manner, that they are undertaking the activities to position themselves to go across the threshold and weaponize, should the Supreme Leader make the decision to do so. So, we are at a perilous moment.

Their nuclear program is geographically diverse. Some of it is aboveground; some of it is buried deeply underground. This means it is not a one-night military campaign. We are talking about a serious campaign to set back a program in order to, then, buy time

to negotiate or figure out what steps would happen on the other side of military action. It is a serious piece of business.

Mr. MEEKS. I think my time has expired.

Mr. LAWLER. Thank you to the ranking member.

I now recognize for 5 minutes the gentleman from South Carolina, Mr. Wilson.

Mr. WILSON. Thank you, Mr. Chairman.

And thank you for being here today.

What an important topic, as we face the threat from Iran. And to me, the regime in Tehran is very clear; they believe death to Israel; death to America. They believe that by developing a nuclear capability that would be existential to Israel, it would be existential to the United States, particularly, as they develop an ICBM capability, which could only have one purpose, and that is to deliver a nuclear attack on the American people.

And so, over and over again, I'm so grateful to the leadership of Donald Trump to let the dictatorship in Tehran know that they should not develop a nuclear capability and nuclear bomb, and it should not be developed.

And then, we need to get to, if we determine they are not, there must be actual verification, not some charade, of determining whether it has been stopped or not. And so, I have absolute faith.

And I'm really grateful for Chairman Mast to bring up, indeed, that we need to do all we can to stop the financing of the dictatorship, with it being revealed that 90 percent of the oil and gas being sold goes to the Chinese Communist Party. Let's connect the dots, and then, we connect another dot.

And I was very grateful for President Donald Trump over the weekend to identify the dots that are connected between War Criminal Putin and the sale of oil to maintain his dictatorship and the call for secondary sanctions. And these will be secondary sanctions that would be against allies of—not against, but working with allies of the United States, that they should be part of sanctions.

So, over and over again, we are in a situation as we face the malign influence, the topic today, and we have a circumstance that is so clear to me, and that is that we are involved in a war we did not choose. And that is dictators with rule of gun invading democracies with rule of law.

It began February 24, 2022, with the invasion of Ukraine. Then, October 7, 2023, the puppets of Iran, Hamas invading Israel. And then, over and over again, we just need to be working together.

And with that in mind, I would like each of you—but, in particular, Mr. Roule—the issue of sanctions, what more sanctions can we have? And I want you to know that many of my colleagues here, that we have introduced a number of bills today, the Maximum Support Act, bipartisan, with Congressman Jimmy Panetta.

We also have the Free Iraq from Iran Act—I had two of my sons serve in Iraq—to liberate Iraq. We didn't mean for it to be liberated, for Iran to come in with militias to control the country. And so, that needs to be achieved.

And then, I'm really grateful that we have got legislation pending—and I need people really smart like Congressman Huizenga to be part of this—and that is to address the network of Hezbollah here in the Western Hemisphere working with drug cartels.

With all of that, what can we do in terms of sanctions to help the people of Iran, not the dictatorship?

Mr. ROULE. Superb question, sir.

Very quickly, any legislation should ensure that we loudly and clearly say that the Iranian people can obtain food and medicine from the United States and elsewhere. Because their own government's corruption and inefficiency prevents them from doing so, to include during COVID, where over a billion dollars of corruption cost them medicine that they so desperately needed.

I would say that anything that could be done to deny the Quds Force resources, because that goes directly to terrorism, terrorism in the Homeland, and supporting proxies overseas who are attempting to kill Americans and individuals in the region, is important.

Thank you.

Mr. WILSON. And, Ms. Jungman, indeed, the tanker tracking is so important, and we are talking about ghost ships of War Criminal Putin. We are talking about refineries of the Chinese Communist Party over and over again. So, how is this being processed?

Again, President Trump has made every effort and been clear he is going to act.

Ms. JUNGMAN. Thank you for the question.

I think it is important to remember that the revenue Iran accumulates from its oil sales is not revenue going back to the people of Iran. This revenue is going into the regime, into the regime's pockets.

And I think it is also important to remember that the maritime industry is a large industry. There's a number of Western touchpoints that these vessels have that can be sanctioned or you can threaten sanctions on.

For example, the classification societies. Essentially, every vessel needs to have a safety certification which is given from a classification society to ensure that it is safe to sail the seas. Without that classification certificate, a vessel cannot sail into a port. We have yet to see any sanctions on these classification societies. Flag registries as well and insurance companies.

Mr. WILSON. And my time is up. I yield back.

But tell you thank you for your insight.

Thank you, Mr. Chairman.

Mr. LAWLER. Thank you, Mr. Wilson.

I now recognize for 5 minutes the gentleman from California, Mr. Sherman.

Mr. SHERMAN. What we learned early this century is that just an American leader pounding the table, as several did, and say, "This country will not be allowed to have nuclear weapons" is not exactly effective.

That is why I was here, saw several Presidents make that declaration with regard to North Korea. And now, North Korea has scores of nuclear weapons.

I'm going to ask our witnesses to give us an answer in writing about North Korea. Because 20 years ago North Korea provided not nuclear weapons to Syria, but the technology to build them. The reason for that is North Korea didn't have a surplus of nuclear weapons at the time, didn't want to give up their nuclear weapons,

but they are happy to have Syria have nuclear weapons and to make some money off of it.

So, I would like each of our witnesses, for the record, to detail ideas on what we do to prevent Iran from buying a nuclear weapon from North Korea, which today does not have a surplus of money and does have a surplus of nuclear weapons. And in particular, I would like you to address what steps we could take to force China to agree, at least privately, that no plane would be allowed to go directly from North Korea to Iran without stopping for inspection.

I might add that I discussed this with President Obama in the Oval Office long ago and was unable to—and while he pointed out to me that we intercept certain ships leaving North Korea, he was unwilling to take action to prevent direct plane flights. At least he didn't think it was a good idea at the time.

The MAHSA Act, named after Mahsa Amini who was brutally murdered by the Iranian regime, directed the administration to make targeted sanctions determinations on senior officials in the Iranian regime.

Ms. Stroul, what can the administration do to better utilize those authorities and go after particular individuals responsible for human rights deprivations in Iran?

Ms. STROUL. Well, thank you for that question, Congressman.

The administration should certainly make use of the authorities granted to it by Congress in the MAHSA Act and continue to shine a light and impose—

Mr. SHERMAN. Any particular individuals you would want to name today?

Ms. STROUL. I don't have particular individuals.

Mr. SHERMAN. Okay.

Ms. STROUL. I don't know—

Mr. SHERMAN. I add them for the record and I'll ask our witnesses to do that.

[No statements have been submitted:]

Mr. SHERMAN. But I will point out our witnesses have pointed out that you can't bomb knowledge away; that even an agreement with Iran is valid only so long as they adhere to it. Nothing will permanently prevent the Islamic Republic of Iran from having a nuclear weapon, except the permanent end to Islamic Republic of Iran and the creation of a truly democratic Iranian government.

I am, therefore, shocked that the administration has cut, eliminated all the democracy and civil society programs in Iran, all of our support for grassroots political movements, all of our support for independent media.

Now, I know that USAID spent a few tens of thousands of dollars doing stupid things that don't reflect American values, and certainly don't reflect our strategic needs.

But we saw just yesterday the Chinese were rescuing people in Myanmar and we did not have the capacity to save a single life in Myanmar. We sent some people recently, long after, I think, all the survivors would have been deceased, to go scout out the situation. That's what happens when you lose USAID.

Ms. Stroul, I would like you to focus just on the Trump years, 2017 to 2021. During that 4 years, did Iran increase its missile capacity? Yes or no?

Ms. STROUL. Yes.

Mr. SHERMAN. During those 4 years, did Iran expand its stockpile of enriched uranium?

Ms. STROUL. Yes.

Mr. SHERMAN. During those years, did Iran increase its capacity to refine uranium through banks of centrifuges?

Ms. STROUL. Yes.

Mr. SHERMAN. So, well, I hope that Trump 2.0 works better.

Ms. Jungman, you have brought the importance of cryptocurrency. I would point out that our sanctions that got us in 2015 were pretty much based on our power to control international currency, because it was all dollars.

The crypto enthusiasts and the leaders in that industry have said they want to take that away from the United States because they think it is illegitimate for America to have that power. Do you think that we should give up the power that we get from having the dollar being the world's reserve currency?

Ms. JUNGMAN. No, I don't think we should give up that power, but I do think that there needs to be stronger regulations and monitoring of what's being done—

Mr. SHERMAN. And my time is expired.

Mr. LAWLER. Thank you, Mr. Sherman,

I now recognize the gentleman from New Jersey, Mr. Smith, for 5 minutes.

Mr. SMITH. Thank you very much, Mr. Chairman.

Let me just ask two basic questions.

You know, despite presenting itself as a U.S. partner, Azerbaijan under Aliyev—and I have met with him twice in Baku and raised human rights issues with him, and recently, obviously, he committed genocide against the people of Nagorno-Karabakh—he signed a cooperation agreement with both Iran and Russia, including a significant guest swap deal with Tehran. These actions, in my opinion, directly benefit the two regimes that the United States is actively working to counter. And I'm wondering what your thoughts might be on that.

Second, if I could, Rob Malley, you know, we know that the Office of Inspector General—I have read the report. It was a good report about the fact that the State Department did not follow its own clearance guidelines. But the bigger issue is having someone who was seemingly very much in favor of Tehran's policy in such a strategic position as Special Envoy does raise the question what damage might have been done, has been done, and might even carry forward right into today, especially as to Tehran's perceptions of what we are all about.

And do you think the FBI will ever get to the bottom of it? And if you could speak to that as well? But those two questions, if you could.

Norman?

Mr. ROULE. In order to restrict Iran's access to funds and to apply the appropriate diplomatic and economic pressures, it is critical that Iran not have the capacity to undertake economic deals such as it conducted with Azerbaijan with anyone.

As Ms. Stroul correctly stated, Iran is under the greatest pressure when it faces multilateral economic and diplomatic isolation,

and that must be absolute. Whenever there are exceptions to that, Iran benefits and that weakens the pressure on Iran itself.

Regarding Mr. Malley, it is out of my level of competence and I would defer to the Federal Bureau of Investigation or others.

Thank you.

Mr. SMITH. Would any of you want to comment on either of those two issues?

Ms. STROUL. I would simply note that, in the Biden administration, and again, in this administration, there is an aligned objective of pursuing negotiations first for a verifiable deal that blocks all Iran's pathways toward a nuclear weapon.

And I think it underscores the importance of an independent and strong Inspector General in the State Department, as well as an FBI who is allowed to conduct credible and important investigations.

Mr. SMITH. Claire?

Ms. JUNGMAN. No.

Mr. SMITH. Do any of you have any sense as to when the FBI may reveal where it is in terms of this investigation? It seems like Malley just fell off the face of the earth. And to have someone of his Special Envoy in such a strategic position seems to me would undermine what this country was all about in our dealings with Iran. Would you agree with that at least?

Nobody? Okay.

I do hope that we will followup on the Azerbaijan connection. Again, I have met with a number of people who have political prisoners sitting in his horrible jails. He is so brazen that in the past he put a stringer who was an Azerbaijani woman into jail, gave her an over 7-year prison sentence, and she worked for Radio Free Europe.

So, I actually convened a hearing and had the head of Radio Free Europe come and testify about how horrible it was. And what was her crime? She pointed out how corrupt Aliyev is.

And now, we have a situation again where he is getting into deals with a country that needs hard currency extremely hard. We know that Xi Jinping and the Communist Party, they enable dictatorships and bad actors everywhere. But this man, who gets a free pass in this town—and that is Aliyev—needs to be called out.

I thank you and yield back.

Mr. LAWLER. Thank you, Mr. Smith.

I now recognize the gentleman from Massachusetts, Mr. Keating, for 5 minutes.

Mr. KEATING. Thank you, Mr. Chairman.

Ms. Stroul mentioned how important our allies are to us in this regard, even though we did move away from them and left many of them hanging from pulling out of the JCPOA. But I want to just comment on that.

First, last year our allies did participate with an Iran proxy, the Houthis, in an attack with fighter jets, with ship-based cruise missiles, with targets like, you know, Houthi missile launchers, air defense systems, radar, weapons systems. We worked together. The UK participated in this. Canada participated in this. Australia and the Netherlands participated in this.

Well, what has happened to our allies now with the Trump administration's latest actions and talks, deliberately irrigating—and this really takes a great deal of effort—our allies, Canada, wanting to make that the 51st State and bullying them with tariffs without negotiating the way you would with an ally.

How does Canada respond? Well, Canada responded just last month with a \$4.2 billion investment in cutting-edge radar with Australia, despite our geographic location in the Western Hemisphere—with Australia. And they are partaking with other European countries right now in alternative military buildup discrete from the United States, because of these actions.

Denmark is part of NATO. And how are they reacting when they say they will take Greenland by force if necessary?

Portugal, a NATO country, and other NATO countries, they are reconsidering buying F-35s because of their fear of the U.S. control over the parts and software. These are our allies. These are people that are instrumental to our success worldwide, but also in the Middle East.

And let's talk about the leaked Signal chat that was there. Our Vice President saying, "I just hate bailing out Europe again."

And what about our Secretary of Defense saying, "I fully share your loathing of European freeloading." It is pathetic.

And what about Stephen Miller in that chat? They had a lot to say and our allies were listening. He said, "We will have to make it clear to Egypt and Europe what we expect in return." "We also need to figure out how to enforce that requirement. If they don't remunerate, then what?" "If the U.S. successfully restores freedom of navigation at a great cost, there needs to be further economic gain extracted from them in return." That's the Signal chat. Those are the other actions, and I could go on.

How can we really expect our allies to trust us on such an important issue as Iran and dealing with the malign influence throughout the Middle East if this is what they are getting in return? And we have already seen, as I have shown, some actions on their part where they are moving away from us because they can't trust us.

Ms. Stroul, are we weaker without our allies side by side with us?

Ms. STROUL. Thank you for that question.

Certainly, one of the core elements of American strength and its ability to accomplish its national security interests has been our unmatched network of allies and partners across multiple theaters. Any objective that we want to make the American people safer and our country safer is better done in coordination with allies and partners.

Part of the reason we need to put in effort to align diplomatically, share burdens and resources upfront, is because there may be a time when we ask our allies and partners to do something that is not easy or is inconvenient.

Mr. KEATING. Like they did after 9/11 in joining with us—

Ms. STROUL. Absolutely, sir.

Mr. KEATING [continuing]. under Article 5.

Ms. STROUL. Absolutely, sir.

So, as we think through all of our different objectives in the Middle East, we have seen our European allies stand up, as well as

our partners in the Middle East. The Air Defense Coalition last April was a good example. France's leadership in Lebanon is another example. The European coordination in Syria is another example. And absolutely, both the defensive presence in the Red Sea to defend against Houthi attacks and the offensive military strikes over the past year are great examples of our allies and partners putting skin in the game.

Mr. KEATING. Thank you. I yield back.

Mr. LAWLER. Thank you, Mr. Keating.

I now recognize for 5 minutes the gentleman from Pennsylvania, Mr. Perry.

Mr. PERRY. Thank you, Mr. Chairman.

Ladies and gentlemen, appreciate your time here today. We just get real about this conversation for once. Iran is a country that is run by a criminal terrorist regime. That is what Iran is. We are talking about having negotiations with them and so on and so forth. I guess we have got to.

But North Korea is a criminal essentially terrorist regime when you look at what it does to its own citizens. It does it because it can't afford to export its terrorism. But Iran does. And has continued to do so. And even with the fact notwithstanding that 80 percent of Hezbollah's drones and missiles have been taken out, Assad's regime is gone, Tehran's missile factories have been devastated, the Houthis are finally under some real fire, Iran still exists. And we are talking like there is—well, let me ask you. You guys are the experts.

Mr. Roule, is Iran going to give up its nuclear program? Have they ever shown any interest whatsoever? But before you answer that question, is there any question in anybody's mind on the panel that their nuclear program is specifically for weapons—it is a weapons program. It is not for power or any—or medical research. It is for aggressive military action. Is there any question about that? Is there any dissent from that?

Mr. ROULE. Frankly, sir, the question is the—I think the best way of putting it is Iran has a civilian nuclear program and has kept open the option for a military—

Mr. PERRY. Why do they need enrich so much for a civilian program?

Mr. ROULE. Not only do they not need to enrich—it is a great question—they are now focusing the enrichment aspect of their entire nuclear program on non-civilian enrichment. So they need to enrich between—

Mr. PERRY. Yes.

Mr. ROULE [continuing]. 3 and 5 percent in—

Mr. PERRY. It is a weapons program.

Mr. ROULE [continuing]. civilian. They are enriching at 60 percent, which is only military grade. In essence, they are shaping their entire civilian nuclear program to make it look as if they are aiming for a military program. It has no civilian use. It is architecture they are creating. That doesn't mean they have decided to make a bomb. And we have heard the DNI Gabbard say they are not doing this, but facts are facts in that regard.

Mr. PERRY. Maybe I should have added they are a lying criminal terrorist regime, right? They lie about things. They use diplomacy

to their advantage because the rest of the—to the point of the JCPOA, the rest of the world are our allies, followed President Obama who didn't want to see a nuclear Iran during his term, but didn't mind seeing one 15 years later when he was no longer the President. It didn't stop their nuclear production, their military nuclear capability. It just delayed it. That is all it did. Nobody here wants to acknowledge it.

But to my other point, have they ever shown any interest whatsoever in getting rid of this nuclear program for whatever way you want to describe it?

Mr. ROULE. No, and in fact it is——

Mr. PERRY. No.

Mr. ROULE [continuing]. extremely—their red lines have been not giving up industrial enrichment, not closing any facilities, and not giving up R&D. And it is very unlikely they will give up any of those red lines without significant pressure and the threat of military action, unfortunately.

Mr. PERRY. Ms. Jungman, you disagree with that?

Ms. JUNGMAN. I do not disagree. Completely agree.

Mr. PERRY. Ms. Stroul?

Ms. STROUL. I do not disagree.

Mr. PERRY. Okay. So what are we talking about here? We are talking about—like we can have some conversation that is going to get them to give it up even while we all know in the room they ain't giving it up, right?

Ms. Jungman, they got what, 300 ghost ships running around selling their oil which is sanctioned, but they sell it to the Chinese and whoever they want. And where does that—does that money go to the people of Iran? Look, there are probably wonderful—I am sure there are wonderful people in Iran that don't want to live under this yoke of terrorism. But the money is not going to them, is it? It is going to who?

Ms. JUNGMAN. No, the money from Iran's oil goes right back to its terrorist proxies.

Mr. PERRY. Yes, it is terrorist proxies, the Quds Force, probably to their nuclear weapons program.

Ladies and gentlemen, all we are doing is delaying the inevitable, right? We are acting like we can talk our way out of having this cancer get worse by just having the cancer kind of settle down for a little bit. There is a cancer in the Middle East. There is a cancer on the globe. The name in this case is Iran and the leadership in Iran. That is the cancer.

We better get real about what we are talking about because they are not going to give it up willingly no matter what the negotiation is. And I just wish that we would quit fooling around and acting like the IAEA is going to tell us something. I mean, they wouldn't even allow an America inspector on the team. They wouldn't allow inspectors to visit military sites. Who are we kidding here?

I am sorry I didn't have any questions. I yield.

Mr. LAWLER. Thank you, Mr. Perry.

I now recognize for 5 minutes the gentleman from Texas, Mr. Castro.

Mr. CASTRO. Thank you, Chairman.

Thank you all for your testimony today.

Ms. Stroul, in your testimony you recommended that Congress, quote, “strengthen the administration’s hand by beginning the process to conditionally authorize the use of military force against Iran’s nuclear program if the regime proves unwilling to take sufficient steps to ensure that it will not acquire nuclear weapons.” And I guess that recommendation gives me some concern based on history.

This was the same argument made to justify voting for the Iraq War in 2002. In debates in the Congress they argued that a show of resolve by Congress by preemptively authorizing the use of military force against Iraq would strengthen the Bush administration’s hand in negotiations and force Saddam Hussein to come to the table. What ensued with the Iraq War was one of the biggest mistakes that our country has made in decades, and I don’t think any of us, or most of us at least, want to repeat that same mistake. And I am concerned with everything going on now that we could with Iran.

The American people are not looking to get into another protracted war in the Middle East. I think most folks would agree with that. I am also skeptical that the votes—or that the votes are there for such a war, skeptical that the votes are there. In February 2020 bipartisan majorities in the House and Senate voted to end hostilities with Iran after the strike on Soleimani.

During the congressional debates on the repeal of the 2002 Iraq AUMF, some Republicans attempted to ensure that the law could still be used to strike Iranian-backed proxies. In response, a bipartisan majority in the Senate, including with the crucial support of now Vice President J.D. Vance, voted 60 to 36 to stop those efforts.

And so my question is would you say that we should strengthen the administration’s negotiating hand by preemptively authorizing the use of military force against Iran? Do you trust Donald Trump and his administration with that responsibility at this time?

Ms. STROUL. Thank you so much for this question, and I think it is a very important point. So the words I chose were “begin the process to conditionally authorize,” and I think those two clauses are important in the point I am making.

One is begin the process. That is because I don’t think that this decision should be left in the hands of any President without advice and consent and consultation with Congress. And conditionally because I am not recommending preemptive authorization. I am recommending that by Members of Congress having debate about the conditions and circumstances under which it would approve use of military force it will send a signal of bipartisan consensus and commitment that that credible military option remains on the table should negotiations fail.

I want to be very clear that my recommendation associated with Mr. Roule is that we should pursue negotiations first because no military action will eliminate the knowledge and the entire program overnight.

Mr. CASTRO. I guess what would the—per your recommendation what would that trigger be? When do you start down that road?

Ms. STROUL. First I think the intelligence community should be providing regular updates to Members of Congress in a closed and classified atmosphere on exactly what the steps are that the intel-

ligence community understands Iran to be taking. And second, I think there should be consultations about exactly what is being contemplated when we talk about military strikes on Iran.

Mr. CASTRO. Would you require that we go through a JCPOA-type negotiation before going down that road?

Ms. STROUL. I think that testing the diplomatic waters with the regime either in a multilateral context in indirect negotiations that appear to be contemplated at this moment. Either way, a negotiated settlement is by far more—easier to verify in implementation and blocking Iran's pathways to a nuclear weapon than military force, which on the other side we don't know what regime decision-making would be. We don't know what Iranian decisionmaking would be. And we don't know what the war looks like on the other side of that. And this is why I think there is such serious issues that merit congressional input.

Mr. CASTRO. Thank you. And also for the other witnesses, just for the record as we are having this discussion, do you believe that we should to a preemptive AUMF?

Mr. ROULE. I associate myself with Ms. Stroul's comments. We should have a thoughtful process in which Congress plays its rightful role as an institution. But the Iranians must understand that endless negotiations aren't the only strategy of the United States.

Mr. CASTRO. Thank you.

Let me check in with you.

Ms. JUNGMAN. Yes, and I agree with Ms. Stroul and Mr. Roule in their comments.

Mr. CASTRO. Thank you. I yield back.

Mr. LAWLER. Thank you, Mr. Castro.

I now recognize for 5 minutes the gentleman from Michigan, Mr. Huizenga.

Mr. HUIZENGA. Thank you, Mr. Chairman.

And during the last Congress I actually led a letter with several of my colleagues on this committee underscoring the urgency of suspending the activity of the Iranian ghost armada. And, Ms. Jungman, you were—have been a part of a couple of those conversations, I think.

Dispatched from Iran, these vehicles ferry illicit oil and petroleum products to bolster the human rights abuses and terrorist acts perpetrated by the Iranian regime. It is their funding source. These foreign-owned and flagged ships operate undetected within the ghost armada and violate maritime law by obfuscating their positioning, thus circumventing U.S., and frankly world enforcement.

At the time of my letter in 2023 the armada was made up of 364 vessels with 47 percent of them being flagged by the Panama Maritime Authority. That is 171 vessels approximately. As the vessel has now grown, I would argue thanks to a lack of action in the last administration about enforcement, it is—sanctions are only as strong as the enforcement that you are willing to put behind it.

And by the way, I serve on the Financial Services Committee. I am the vice chair of that committee. I have been working on this. That is, the origin of many of those sanctions is that committee.

The latest report indicates it has now grown to 521 vessels with 17 percent of those flagged by Panama, which is about 88. So it has been cut in half on Panama.

I am kind of curious. I will start with you, Ms. Jungman. You have worked on this issue by closely tracking these vessels engaging in the transportation of illicit Iranian oil. How should the United States deal with countries that continue to flag vessels that are listed on the Department of Treasury's Specially Designated National and Blocked Person, or SDN list? And where have those other vessels been flagged?

Ms. JUNGMAN. Thank you for your question and thank you for your work on this topic. It is a matter of great importance given that the revenue Iran accumulates from these oil sales is going back to its nuclear program and terrorist activities.

If we look to a year ago, like you said, Panama was flagging a significant amount of the ghost fleet. And that number has dropped drastically, which is showing that diplomatic efforts and negotiations with—

Mr. HUIZENGA. Are you exposure?

Ms. JUNGMAN. Exposure, yes.

Mr. HUIZENGA. Sunlight discussion like this?

Ms. JUNGMAN. Essentially naming and shaming, calling them out for enabling this activity has an impact. And so I think Panama has taken a significant step, but we would of course like to see that 17 percent down to 0 percent.

Mr. HUIZENGA. Where are they getting flagged?

Ms. JUNGMAN. So that is a new problem that has come up. Unfortunately, as a result of Panama de-flagging these vessels we are seeing Iran set up these false registries in Guyana, Comoros, Eswantini even and—

Mr. HUIZENGA. Shall we say maybe less well-known maritime powers?

Ms. JUNGMAN. Sure. Yes. But—

Mr. HUIZENGA. Because they don't have that kind of—typically that kind of flagging capability or that kind of fleet coming out there.

Ms. JUNGMAN. Well, and I think it is important to note that they are not necessarily legitimate flag registries under these countries.

Mr. HUIZENGA. Yes.

Ms. JUNGMAN. They are companies set up in—most likely in Dubai or in India that are really run by Iran and providing these registrations to these vessels.

Mr. HUIZENGA. We are going fast on time, but this is important stuff. I need to jump to Arsenio Dominguez from the Republic of Panama. He was elected, has the 4-year term as Secretary General of the International Maritime organization, IMO. They are the U.N. agency tasked with establishing, quote, "the authority for the safety, security, environmental performance of international shipping." How can he possibly effectively lead the IMO while representing a nation that knowingly green lights this kind of transportation of Iranian oil against international sanctions?

Mr. JUNGMAN. That is a great question and I think the IMO has done little to nothing on this topic and there should be and could be a lot more from them.

Mr. HUIZENGA. Okay. I have got a lot that I am going to have to followup with in some written questions as well, but let's touch on the teapot refineries and deterring those and their willingness

to accept Iranian oil. Has there been an impact since President Trump designated one of those teapot refineries last week?

Ms. JUNGMAN. Unfortunately it is still too soon to see an impact from that and designating one refinery has little to no impact as Iran will just move its oil to other refineries.

Mr. HUIZENGA. Okay.

Ms. JUNGMAN. So there needs to be a more comprehensive approach on targeting and sanctioning them.

Mr. HUIZENGA. All right. And as I have said, sanctions are only as good as the weakest link in the sanctions chain. And that has been a huge problem. We need robust multinational buy-in from allies and partners, including Europe. I recently had a conversation with the Ambassador from the EU who happens to be Lithuanian. She understands this ghost fleet also with Russia and what has been happening there.

Do you sense that there is any appetite, any of you, in Europe to push back on Iran's illicit trade with China, whether it be illicit oil or not?

Ms. JUNGMAN. I don't think I can speak for the Europeans, but I think that we are finally starting to wake up to see that China is the only one benefiting here. China is getting the cheap oil while everybody else is paying real prices and—

Mr. HUIZENGA. Because they sell it at a discount. With that, I know I am over time, Mr. Chairman. I appreciate it and I will be writing some questions as well with everybody. Thank you.

Mr. LAWLER. Thank you, Mr. Huizenga.

I now recognize for 5 minutes the gentlewoman and ranking member of the Middle East and North Africa Subcommittee, Ms. Cherfilus-McCormick, of Florida.

Ms. CHERFILUS-McCORMICK. Thank you so much, Mr. Chairman.

As we have heard today the United States combined with our partners and allies in the region must take all necessary measures to prevent Iran from developing nuclear weapons and to halt the support for terrorism. One of the main tools to help Iran's development of nuclear weapons and its continued funding of its terrorist proxies is sanctions. That is why I was proud to introduce bipartisan legislation with Congressman Lawler, who is the chairman for the Middle East, to strengthen sanctions on foreign entities enabling Iran's illicit oil trade.

Over the past few years we have witnessed growing alignment between Iran, Russia, and China, presenting a significant challenge to United States' national security and global stability.

Ms. Stroul, what steps did the Biden Administration take to combat these alliances?

Ms. STROUL. Thank you for that question. A variety of different elements. The first is to lean into strengthening our unmatched network of allies and partners in order to increase Russia's isolation in the European theater, China's isolation in the Indo-Pacific theater, and Iranian isolation in the Middle East. We work with all of our long-time allies and partners across those different theaters.

No. 2 was to highlight and expose the ways in which this axis of upheaval is supporting itself counter to the interests of our allies and partners. Iranian drones killing Ukrainians via Russia, Iranian support to Russian defense industry, Russia's provision of

more sophisticated defense technology to China, Chinese purchase of Iranian oil at a discount. I could go on and on with these examples.

We should also talk about North Korean foot soldiers fighting on behalf of Russia in Ukraine. All of this suggests an emerging axis that is working to challenge the current international global order that benefits and keeps Americans safe.

There was also successive rounds of sanctions to break and diminish the different ways in which they are strengthening. And again, provision of security support, assistance, military aid, and intelligence to our allies and partners so that they understand exactly what the negative strategic impact is of this emerging axis to their and our security.

Ms. CHERFILUS-McCORMICK. What additional measures can you—would you recommend be implemented to prevent Russia and China from aiding Iran in evading sanctions?

Ms. STROUL. Well first of all, we need to continue to sanction those activities. And the sanctioning not only cuts off and disincentivizes it from a financial perspective, but it also shines a light on and exposes that nefarious activity.

Clearly though I would say that it seems the Chinese government doesn't really care if it gets exposed and neither does President Putin of Russia. So we are going to have to find more ways to disincentivize this behavior. And a lot of that is making sure that Moscow, Beijing, and Tehran feel the consequences of this cooperation not just from Washington, but from European capitals and Middle East capitals. Red carpets should not be rolled out for the leaders of these countries. Sanctions loopholes and certain economic environments should not be allowed for these illicit networks, and more has to be done to impose consequences and costs.

Ms. CHERFILUS-McCORMICK. Well, I want to turn our attention for a moment to Syria. We know that the fall of the Assad regime was a major blow to Iran's influence in Syria, however what America does next is critical to the future of the country. Ms. Stroul, do you believe America's current policy in Syria is positioned well to further undermine Iran?

Ms. STROUL. Right now we have a transitional government in Damascus under the leadership of Interim President Ahmed al-Sharaa and he is saying that he is committed to fighting Isis in Syria and has told Iran that they will not be allowed to use Syrian territory the way they did under Bashar al-Assad. And he is also looking to impose consequences on Russia and deny it use of that naval base that is on the Mediterranean.

All of these are interests that align with U.S. security objectives as well as having a secure unified Syria under the control of one government, but right now U.S. policy is not geared toward seizing these opportunities. We need to find ways to support the Syrian people through some measured sanctions relief benchmarked against performance of the Sharaa government.

Ms. CHERFILUS-McCORMICK. And before I run out of time I just wanted to ask you this last question. Do you believe that dismantling the USAID in Syria is helpful or harmful to U.S. interests in Syria?

Ms. STROUL. I believe that it is harmful. I think what Syrian people will remember is an American flag or the USAID stamp on emergency food assistance, stabilization assistance, clean water, baby formula, and the U.S. actually putting skin in the game to demonstrate that we care about the lives and the livelihoods of Syrian people. And by taking this precious element of American power off the table we undermine our own ability to achieve our interests in Syria.

Ms. CHERFILUS-McCORMICK. Thank you. I yield back.

Ms. KIM. [Presiding.] Thank you. I now recognize myself for 5 minutes.

Ms. Jungman, you talk about the sophisticated and deceptive techniques that the Iranian regime is utilizing to evade oil sanctions including through foreign front companies. Iran also remains heavily dependent on China to sustain its illicit oil trade which is like 90 percent of Iran's oil exports go to China, primarily independent teapot refineries. So you note that Chinese purchase of Iranian oil increased by over 20 percent last year despite the U.S. sanctions.

So in your perspective how successful has the U.S. been in identifying these teapot refineries and front companies?

Ms. JUNGMAN. Thank you for your question. I think it is important to remember that until end of 2024 we saw an administration that was essentially giving lax sanctions enforcement. As a result of that, Iran was able to buildup its revenues and in turn is—despite these sanctions is easily able to replace the vessels that are designated. And until there is a comprehensive designation across the entire ghost fleet these vessels will continue to export Iranian oil to China.

When looking at the refineries themselves I think that it was a great first step from this administration to designate the refineries we saw sanctioned I guess 2 weeks ago, but unfortunately designation on one refinery has little to no impact. There has to be a comprehensive holistic approach on all of the refineries that are taking on Iranian oil.

Ms. KIM. You talk about the realistic short-term action that the U.S. can take to close that loophole. What about the long-term actions, short-term and long-term actions that we can take to close that loophole?

Ms. JUNGMAN. Sure. I think that there needs to be—in addition with sanctions there has to be negotiation or a diplomatic approach. And I think if there is any President that will be able to figure out what to hold over China's head, it will be this President.

Ms. KIM. Thank you. Mr. Roule, one of the recommendations you provide in your testimony to counter the Iranian regime's malign activities is to continue investing in the regional military, economic, and commercial partnerships, because in your testimony, in quote, "regional economic and social success is as essential to our security interests as their military strength," end quote.

So what role do joint security exercises or intelligence sharing activities with our allies play in disrupting the Iran's illicit activities?

Mr. ROULE. Thank you, Congresswoman. the relationships we have with our Gulf partners and other regional partners played a profound role in the defense of Israel during Iran's ballistic missile

attack on Israel. We saw years of CENTCOM's investment in those relationships come to fruition in the smooth air defense of the entire region. And thousands of lives, perhaps hundreds of thousands of lives were saved as a result of that.

But this is a broader target set because the Iranians are moving, as I say, in the Red Sea Basin. They are moving in the Persian Gulf area. They are moving in—throughout the Arabian Peninsula. And these relationships require a tremendous investment by the CENTCOM team as well as our Department of Defense as a whole.

Ms. KIM. Thank you. Ms. Jungman, let me come back to you. You talk about the IRGC's efforts to diversify its revenue streams including through cryptocurrency and how it offers Iran a way to bypass financial oversight and quietly move funds across the borders. So in your perspective how extensively is the IRGC using cryptocurrency to evade sanctions?

Ms. JUNGMAN. We saw around I think it was \$8 billion of transactions from Iran using cryptocurrency. And I think that this is an area they are obviously tapping into as sanctions are coming out. So they are moving their money there because it is harder to track. And I think that it is an area that sanctions could be enforced stronger.

Ms. KIM. So could you talk about some of the policy changes that you think is necessary to improve that effectiveness of sanctions? And also, what risks do Iran's cryptocurrency and front company activities pose to global financial integrity?

Ms. JUNGMAN. This is not my area of expertise, but I am happy to followup with a written response there.

Ms. KIM. All right. Well, thank you so much. I ask that because I want to see if these tactics could set a precedent for other rogue actors or states. And I think we have been pretty clear on the reason why we need a digital assets framework to coordinate with our allies to address those crypto crime. So thank you so much for your testimony and I yield back.

Let's see, who is next? Representative Stanton, I recognize you for 5 minutes.

Mr. STANTON. Thank you very much, Madam Chair.

Iran has built a network of proxies across the Middle East sowing chaos and instability in the region for decades. It has funded, trained, and armed Hamas, Hezbollah, and the Houthis, and various militia groups to target Israel and other regional rivals, all while keeping Tehran out of the direct conflict.

The human cost to Iran's offensive is undeniable. On October 7, 2023, 1,300 Israelis were murdered by Hamas terrorists and attacks by these proxy militia have injured or killed American troops. Over the last 18 months Iran has continued to support its proxies as they send ballistic missiles and drones at Israeli targets and at American Service members. But Iran's axis of resistance is waning. Right now we are at a critical and fragile moment for the region. Iranian proxies are weakened and new leadership in Lebanon and Syria are refusing to bow to Tehran's influence.

The U.S., acting in partnership with our allies, has an opportunity to end Iran's malign influence and to protect our ally Israel and expand the Abraham Accords and change the trajectory of the region for decades to come. But we can only take advantage of this

moment if we maintain a focus on democracy building, work with and support our allies in the region, and fully enforce the U.S. sanctions regime.

In a completely self-defeating move the Trump Administration has eliminated impactful programs that support the rule of law, protect human rights, and counter misinformation. Limiting U.S. foreign aid and programs is a gift to our adversaries—Iran, but also to China and Russia. International investments are an essential instrument of U.S. foreign policy and U.S. national security policy, and has been for decades under Republican and Democratic administrations.

Now, there are still some active aid programs in the region and we need to make sure those resources get delivered efficiently to the people that need it.

Mr. Roule, what can the U.S. do to support foreign aid delivery while also preventing Iranian malign activity?

Mr. ROULE. The best expertise on foreign aid delivery in the region are regional partners themselves. They know the neighborhood; they know the players; they know where corruption exists; they know the needs of their people. And building relationships with these actors themselves will allow us to know how best to deliver and where are—the impact can be the greatest.

This goes to the previous question by one of your colleagues. Do we have relationships with our reliable partners in the region? And we extract utility from that in many different areas to include foreign aid. We can build soft-power impact as well as our military impact.

Mr. STANTON. To successfully deter Iran and our global adversaries we should be leveraging our allies and our partners. President Trump's go-it-alone foreign policy strategy is short-sighted and self-defeating. He started trade wars with our neighbors and angering our friends, even causing South Korea and Japan to restart trade discussions with China for the first time in 5 years. And Vice President J.D. Vance in public speeches, and embarrassingly in leaked Signal chats, has spit in the eye of our European allies.

Europe is the second largest arms supplier to Israel. The U.K. critically stepped in to shoot down missiles fired at Iran—by Iran, excuse me, at Israel in last October's escalation. And France helped broker the critical Lebanon-Israel cease-fire. They are vital to achieving Middle Eastern peace and supporting democratic goals in the region. In addition to those values Europe's presence and our presence in the Middle East contribute to stronger global trade and business, another vital component of keeping stability.

For Ms. Stroul, how has Europe worked to secure the Red Sea global shipping lanes and how should we work with them to better stop Houthi attacks in the Red Sea?

Ms. STROUL. Thank you for the question. The Europeans have both participated in a U.S.-led defensive coalition called Prosperity Guardian which has kept the critical choke points in the southern Red Sea open. Some European partners as well as others in other theaters also participated with us in multilateral offensive strikes last year to take Houthi capabilities off the table in Yemen. And the Europeans maintain their own separate defensive coalition as well in the Red Sea.

Mr. STANTON. Thank you.

The final question is for Ms. Jungman about China, and they are unfortunately working with Iran. What is China's role in helping Iran avoid oil sanctions?

Ms. JUNGMAN. China plays a large role in enabling Iran to accumulate this revenue. They purchased 90—90 percent of Iranian oil is going to China. It serves as the lifeline for Iran's revenue and extremist activity.

Mr. STANTON. All right. Thank you very much for those answers and I will yield back the rest of my—

Ms. KIM. Thank you. I recognize Representative Davidson of Ohio for 5 minutes.

Mr. DAVIDSON. Thank you, chairwoman.

Thanks to our colleagues for hosting this hearing. Thanks to our witnesses. Appreciate your testimony today.

First, Iran and their despotic regime have just horrible human rights abuses. They have been a force really for terror and instability in the Middle East for a long time. the 10/7 attacks by Hamas were a profoundly evil act by a network of terror groups all linked to Iran. Maximum pressure against these groups and their Iranian sponsors is more than warranted and I applaud the Trump Administration for doing just that.

The second truth about the situation that we are in is that a full-blown ground war in Iran is simply not in America—it is not our war to fight. As we turn toward strategic competition with China we cannot afford to continue to be bogged down in the Middle East. For the United States an economy of force strategy in the Middle East makes sense so that we can address American interests while minimizing the American investment there. This allows us to focus on other strategic threats and more immediate security risks to our own country.

As our committee's State Department authorization process move forward I look forward to engaging on pressing issues for the Arms Export Control Act and AUMF reforms so that Congress is active in confronting the rapidly evolving security environment in the world.

Mr. Roule, thank you for your testimony today. And I personally worry about an overly broad reading of the 2001 AUMF providing a blank check for virtually any war in the Middle East without Congress really having sometimes even knowledge, but certainly input in it. Failure to update the 2001 AUMF represents an abdication of congressional war powers.

So as we confront really needed security challenges with Houthi proxies, for example, who are disrupting sea traffic and posing a threat not just in the oceans to our navy and others, what is the actual underlying authorization today?

Mr. ROULE. Congressman, it is a complicated question. And I am going to evade some of that because I am not an expert, but I will say this: Congress needs to start now, as Ms. Stroul stated, with a process to understand what role should be played to develop specific authorities. Because the Quds Force needs to be taken apart in the region because a nuclear deal that simply provides funding for the Quds Force to reestablish its proxy network to the region

just repeats this entire system of violence. And we will face the same situation over and over again.

So we really do need to understand the prospect of military actions against Iran and its personnel and its architecture at present. And Congress needs to play its role in that.

Mr. DAVIDSON. Yes, thank you for that. That is exactly what I have tried to do for a long time. Since I have been here, really since the summer of 2016, updating the 2001 AUMF has been darn near impossible, frankly. For people like me that wanted to do it, we were blocked from even being on this committee, blocked from—anybody that really wanted reform couldn't get on the Committee of Jurisdiction. And then when you try to do it through appropriations, oh, you know, you are supposed to do it through the Committee of Jurisdiction. And now, even after the Afghan War has wound down, long after we have formally left Iraq, we still keep the 2001 AUMF.

Does anyone believe that the Houthis or Hamas—let's just say Hamas—are they affiliates of Al Qaeda? I mean, that is the underlying situation. They are terrorists in that sense, but they are not coordinating—they share some similar enemies, but they are not really covered by the 2001 AUMF. So I think it is urgent that we update them. And I definitely appreciate you all's effort to call that out.

But, Ms. Jungman, in your testimony you bemoaned the existence of cryptocurrency to some extent saying that the pseudonymist nature of block chain transactions makes enforcement challenging. However, you admit that it only makes up about \$8 billion in transaction.

I am the chairman of National Security and Illicit Finance. We just had a hearing earlier today where people trying to trace the money actually like cryptocurrency because it is on a public block chain. So it is easier to follow the money. It still presents challenges for on and off ramps, but when it is on a block chain, it is easier to detect.

So what proportion of Iran's illicit finance is really crypto versus conventional finance?

Ms. JUNGMAN. In the grand scheme the 8 billion is not that significant when you look at 50 billion that was made in oil revenues last year or 135 billion in oil revenue that was made between 2021 and 2024. So I think that there needs to be stricter enforcement and oversight on the block chain and the crypto transactions, but it doesn't necessarily need to be—

Mr. DAVIDSON. Thank you for that. My time is expired and I yield.

Ms. KIM. Thank you. I now recognize Representative Moskowitz from Florida for 5 minutes.

Mr. MOSKOWITZ. Thank you, Madam Chairwoman.

I want to thank Chairman Lawler and Chairman Mast for bringing this hearing. I have supported for months now giving the Iranians a period of time to end their nuclear program peacefully or that the United States should end it for them. I have worked with Chairman Lawler on that in the last Congress dealing with Iranian oil. And in this Congress Senator Lindsey Graham and I filed a resolution to get a sense of Congress on just that issue.

Iran is weaker now than they have been in a very long time, weaker in the region because of Israel's efforts against Hamas and Hezbollah, this administration's intervention on the Houthis. Now is the time. There is no question now is the time to try to bring this to a peaceful solution, right? And that is really up to the Iranians to choose what path they want to go.

But I also have to recognize that we are in the third month of the administration. And for 3 months now the administration has treated Canada and Greenland and Europe and Ukraine and PBS and NPR and the Associated Press worse than they have talked and treated Iran. I mean, 3 months in they have just noticed all of a sudden that perhaps we should turn our attention to Iran instead of these distractions of, oh, we are going to get Gaza, or Canada is going to be the 51st State, or oh, Greenland.

I mean, this is the opportunity. And it is an opportunity, quite frankly, for the administration that has been very partisan over the last 3 months to do something on a bipartisan basis.

But I am also deeply worried about the Vice President. If we look at the text messages on Signal for Signalgate, the Vice President seems to be against striking the Houthis. Well, if he is against striking the Houthis, then I mean where is he going to be on striking Iran if they don't choose a peaceful solution? Obviously he is the Vice President. The President makes the final decision, but if you look at that conversation, a deputy chief of staff had to weigh in from the White House putting the Vice President in his place saying the President was clear on his direction.

So let me ask a question. Based on what you have seen, we have all seen publicly in that Signal chat, this isolationist trend that is going on in some circles of the Republican Party—Ms. Jungman, are you concerned that we may miss an opportunity to really curtail Iran's nuclear program? Because again, if you look at what the Vice President was saying with the Houthis, right, he clearly did not want to do the strike that the President had ordered.

Ms. JUNGMAN. Thank you for that question. I think it is important to look at the efforts that the administration has done over the last 3 months which includes designations on Iran, its ghost fleet, and a refinery in China.

Mr. MOSKOWITZ. Yes, but those are meaningless. The Biden Administration—I was critical of the Biden Administration of these designations and non-enforcement of certain things. I mean, I was very critical when the Biden Administration did not enforce the bill that Mike Lawler and I passed dealing with Iranian oil.

We can sign executive orders for maximum pressure, but really—this President is not shy. I mean, he is not shy. He tells us how he feels at all times. OK. And so just last week all of a sudden we turned our attention to Iran, which I am happy about. Better late than never.

But there is something going on in this administration that should all wake up to, that there is a wing led by the Vice President that didn't want to strike the Houthis and probably doesn't want to curtail Iran's nuclear program. How are you going to deal with that?

Ms. JUNGMAN. I don't see that from Treasury right now. I do think that there are efforts being made and I think looking at the

questions we have received there is an—there is bipartisan consensus to go after Iran. And the Vice President alone—

Mr. MOSKOWITZ. Yes, and look, we have to be clear, right? Because Democrats have made this mistake. When you draw a red line and then you don't do it, we see problems. That is what happened in Syria under the Obama administration. So President Trump has drawn a red line. He has said either we are going to end it peacefully, which I hope we do—we want—we all want that—or the United States is going to end it. That has been said now. And that is what we have to hold the President to. I yield back.

Ms. KIM. Thank you. I now recognize Representative Issa of California for 5 minutes.

Mr. ISSA. Thank you. I am going to pick up where my colleague just left off. Better late than never? Has it been 75 days or is it 72? I wouldn't call this late, with all due respect. But let's contrast it with the previous 4 years.

What was the economic position of Iran on the day that President Trump left office?

Ms. JUNGMAN. They were a lot weaker than they are today.

Mr. ISSA. Were they shipping a couple hundred thousand barrels a day, not a million-and-a-half barrels a day?

Ms. JUNGMAN. That is correct.

Mr. ISSA. So during the 4-years of the Biden Administration perhaps in plain sight while other things were being discussed: JCPOA, Iran's nuclear and so on, they went up by more than a million barrels a day times \$75, right?

Ms. JUNGMAN.

[Nonverbal response.]

Mr. ISSA. Most of it was sold to China, correct?

Ms. JUNGMAN.

[Nonverbal response.]

Mr. ISSA. So the last administration allowed China to enrich Iran. During those 4 years is it accurate to say that that money, a great deal of it ended up in the hands of Hamas, the Houthis, and Hezbollah?

Ms. JUNGMAN. That is correct.

Mr. ISSA. OK. So I want to go to the go forward. And I know my colleague has left, but 72 days is the beginning of an administration. Over the next 3 years if maximum pressure includes taking ghost ships off the high seas, do you believe it is possible to reverse that 1 million or a 1.2 million of additional oil and bring Iran economically back to where they were 4 years ago?

Ms. JUNGMAN. I do, but I don't think taking the ghost fleet off alone will do that.

Mr. ISSA. I am including that because most of that million barrels plus is shipped through ghost ships, correct?

Ms. JUNGMAN. Correct. Yes.

Mr. ISSA. Okay. So as part of a maximum effort, recognizing that Israel may strike in its own best interest between now and the end of October when nuclear legitimacy, according to the last administration goes forward—as part of a package economic sanctions as we know are not working because people are cheating on them. The No. 1 cheater is China. As the President uses his pressure with

China and tariffs should he include reducing the purchases of clandestine oil from China and Russia as part of a deal with China? Would that be helpful? Additionally, the same thing goes for our European allies who either directly or indirectly buy that sanctioned oil.

Ms. JUNGMAN. Absolutely. I think that is a great place to start and hopefully would have an impact.

Mr. ISSA. Now just before I spoke we heard about the so-called reluctance of the Vice President to strike the Houthis. In fact, isn't that one of more major proactive strikes that has occurred in the last several years?

Ms. JUNGMAN. Correct.

Mr. ISSA. That particular strike as I understand it was an offensive strike to take out capability, not simply a retaliatory for a place from which they were fired?

Ms. JUNGMAN. I am going to defer to Mr. Roule on that, but he has got more expertise in that area.

Mr. ROULE. They are the most significant strikes we have conducted against the Houthis. They are not only taking out—degrading the Houthi weapons capability, but taking out Houthi leadership and they are starting to impact on the Houthi leadership decisionmaking structure itself.

Mr. ISSA. So Hamas, Hezbollah, and the Houthis, the three most powerful arms of the—of Iran, in addition to the oil that gives them money—if those activities continue at the pace they have been going over the last—some of it more than 75 days because of Israel's efforts with Hamas and Hezbollah. But if those three tentacles of Iran are taken out over the next 3 years, if the clandestine oil is reduced to let's just say the—about where it was 4 years earlier, do you believe we can avoid all-out war with Iran, but bring Iran back to a situation in which they must deal or be unable to function because of economic disaster?

Mr. ROULE. If we could also ensure that the Quds Force does not have a logistics line into the region, we could avoid a war based on activities such as Hamas and Houthi actions—

Mr. ISSA. Right.

Mr. ROULE [continuing]. in the Red Sea. There will be some who will say that Iran could be encouraged to build a nuclear weapon if it thinks it can get away with it and we won't attack. So the President would also have to say if we see you building a nuclear weapon, we are going to have to use another direction.

Mr. ISSA. And I will just close with one statement: Many people have talked about the nuclear capability, but is it fair to say that the ability to build a nuke only allows you to blow yourself up if you don't have the ability to launch it? And isn't that part of the administration's responsibility, along with allies—is to make sure that they do not have the ability to launch a nuclear weapon?

Ms. KIM. The gentleman's time is up. And the witnesses may respond in writing if you would choose to do so. Is that Okay?

Mr. ISSA. Thank you.

Ms. KIM. Yes. Let me now recognize Mr. Olzewski of Maryland for 5 minutes.

Mr. OLZEWSKI. Thank you very much, Madam Chair.

And thank you to our witnesses for your time and your testimony today. I will just open by saying how much I firmly believe with a lot of what was said and how important it is for the U.S. to use all of the tools at our disposal to dismantle Iran's support for regional terrorism and its nuclear ambition. So thank you for your comments on that.

We know that a strong Iranian sanctions regime, which I support and this administration has imposed, is critical to limit the revenue that Iran uses to fund its military and terror proxies in the region.

However, we cannot forget about the other national security tools at our disposal including both diplomacy and development and that the U.S. has to comprehensively counter the regime's malign activities and hold them accountable for human rights violations. The use of force should be an option, but it should also be our last resort option. Again, we need a comprehensive tool box to prevent Iran from becoming nuclear-equipped and to address the root causes of these abuses.

I support a zero tolerance approach for attacks by Iran's proxies on the United States and our interests, but again I also believe that any U.S. action must also be taken in accordance with the law and in ways that protects classified information and civilians overseas.

It is also worth noting and reiterating that this administration's gutting of foreign assistance programs will only weaken that response. There was a program implemented by a non-profit back in my home State of Maryland that supported religious and minorities in Northern Iraq in part not to join Iran-backed militias. This project supported thousands of young Yazidis and Christians in a youth employment project to provide financial incentives not to join these armed groups. In its absence we risk migration and radicalization including to these Iran-backed proxy groups.

We know this program unfortunately is not a one-off. Programs to strengthen local capacity and support ethnic and religious minorities in Yemen, Gaza, and Lebanon where Iran-backed militias continue to hold military and political influence were cut. Iranian media even praised the pause because it would halt U.S. support for pro-democracy activists in the country. Other media compared it to a cold shower for the regime's opponents and joked that the U.S. was "abandoning its allies like disposable tissues," quote, unquote.

Ms. Stroul, can you talk about how these soft-power programs like those administered by USAID and the State Department play an important role in America's response to Iran's activities around the world? How will Iran and their proxies be emboldened by these cuts?

Ms. STROUL. Thank you so much for this question. When we think about all of the different areas where Iran's threat network has been degraded: Gaza, Lebanon, Syria, to some extent Iraq, right now Yemen, what we need to think about is the other side of combat operations.

And that is not just humanitarian aid. It is stabilization, reconstruction. Societies and communities need to have something on the other side in order to buildup their resilience to resist what the Iranians are going to do, which is try to rebuild their illicit net-

works for arming, funding, training both fighters—and then weapon shipments, drug shipments, et cetera. So we have to give those communities resources to buildup their resilience and we have to give the emerging leaders of these nascent governments the opportunity to deliver for their people. And there I am specifically talking about Lebanon and Syria.

So the pause and dismantling of USAID is not just about the humanitarian aid being taken off the table. It is the non-humanitarian aid, the stabilization assistance. And then it is the decades of U.S. investment in developing our technical expertise, our national security practitioners, our development and technical assistance providers who understand that reconstruction and stabilization on the other side of conflict is inherently a political task, not a military task.

Mr. OLZEWSKI. Thank you so much for that response. And I will just close without an additional question recognizing that my time is winding down, but just reiterate what my colleague Representative Keating honed in earlier and just advancing my concern, Madam Chair, about the reckless use of platforms that are not secure and in the sharing of very sensitive data. It is not a way to conduct military operations, nor diplomatic operations, nor to impose sanctions. And so I am deeply concerned about the actions of some of our most highest ranking officials and the fact that there has been no accountability. And with that, I will yield back. Thank you.

Ms. KIM. Thank you. Let me now recognize Mr. Baird from Indiana for 5 minutes.

Mr. BAIRD. Thank you, Madam Chair.

And thank our witnesses for being here today. The expertise you share with us is very beneficial and very helpful. But I am going to touch on a couple or three other areas that are of interest to me, the first one being what role do you think that the Western technology is playing in sustaining Iran, and by extension Russia's ability to produce lethal weapons like the Shahad 136 drone?

Mr. ROULE. We have seen Iran use dual-use technology that is obtained from Europe, even the United States, through sanctions-busting architecture to import this within in its drone system and to—well, even use this within drones that it has sent to Russia for use against Ukraine. This is something that the U.S. law enforcement has worked against successfully in some cases for years. Iran has a robust sanctions-busting program in this regard and Iran will continue to use this system to acquire technology that it can't produce at home.

Mr. BAIRD. Ms. Jungman?

Ms. JUNGMAN. I am going to tackle this from a little bit of a different angle, and I think it is an area that hasn't had a lot of attention. But we have talked a lot today about the dark fleet and the ghost fleet. There is Western technology that is used on these vessels. Every ship essentially has some Western component on it. That is an area that could be looked at closer.

Mr. BAIRD. Ms. Stroul?

Ms. STROUL. I would associate myself specifically with Mr. Roule. The threat is the dual-use technology. So part of this is about sanctions and shining a light and exposure. It is also about education

initiatives with the commercial sector so they understand the risk of both the legitimate uses of some of this technology and then the illegitimate and illicit ways in which a regime like Iran might use it.

Mr. BAIRD. The next part of that is what steps can be taken to prevent Iran from procuring that critical technology?

And, Ms. Jungman, you kind of started on that conversation, so please State.

Ms. JUNGMAN. Sure. I think as I have previously mentioned, there are still a number of Western entities that are involved in the maritime industry and these vessels such as the classification societies, the flag states, and the insurance companies. It is not enough to just designate the vessels themselves. The vessel will move to a new owner, a new company and so on. So there needs to be a more comprehensive approach to targeting these vessels and their associated networks.

Mr. BAIRD. Mr. Roule?

Mr. ROULE. We need to ensure that law enforcement partners in Europe and Asia working closely with the United States and our Gulf partners to identify import actors in Iran who are attempting to bring in dual-use technology for Iran's military and security services.

Mr. BAIRD. Thank you. Ms. Stroul?

Ms. STROUL. I have nothing to add. I think my colleagues did a great job answering the question.

Mr. BAIRD. That is a good answer.

One other area: Do you believe that the United States and its allies are focused enough on preventing the rebuilding of the Iranian proxy groups, and what more could we do if that is true? Mr. Roule?

Mr. ROULE. If there is a nuclear deal that provides Iran with sanctions relief that allows the Quds Force to rebuild Hamas, Hezbollah, and the Houthis over time, we recreate the very world we have worked so hard to dismantle today. It is critical that any new nuclear deal simply does not allow the Quds Force to do this. And this therefore becomes a problem.

Do we come up with an approach? Does the international community compel Iran to in essence change the nature of the Quds Force, to turn it into a counterterrorism element, which is something every country should have, and not an element that has the job of creating militias and terrorists. Until Iran does this it is a terrorist nation.

Mr. BAIRD. Thank you. And I see I only got 26 seconds left, and so I am sorry to the other two, but I yield back.

Ms. KIM. Thank you.

Let me now recognize Representative Schneider of Illinois for 5 minutes.

Mr. SCHNEIDER. Thank you, Madam Chair.

Again I want to the witnesses for joining us here.

So I keep this next to my desk. It is the JCPOA from 10 years ago. It is tabbed and marked and highlighted. Ten years ago I studied it closely because so much was at stake. Iran was on the precipice of a nuclear weapon and the world came together. And at that time, as we all recall, it was the E3+3, it was the P5+1, what-

ever you called it. But it United States, our European allies, U.K., France and Germany, and China and Russia.

As you discussed earlier, what was available to us then is not available to us now. And I had issues with the JCPOA a decade ago because while it may have temporary-temporarily blocked Iran's pathways to a nuclear weapon, it didn't permanently close them. It left it to where we are today.

And we meet today. I really believe there is a crossroad, as you have touched on. Over the past year we have seen Iran's strategic position almost turn 180 degrees. Its proxies are diminished. Its air defenses are weakened. At the same time, again as was mentioned, Iran's breakout time is almost to the goal line. It is measured in weeks, maybe even days.

We all know a nuclear-armed Iran would transform the strategic map of the Middle East once again. It would not only endanger our allies including Israel; it would trigger in all likelihood a regional arms race. It would embolden the terrorist proxies and it would undercut the global nonproliferation regime.

Now we know this moment didn't come out of nowhere. Iran has been working on a nuclear weapon for more than a generation. We can talk about the decision to invade Iraq and then empower Iran. We can talk about the JCPOA, which was a problem. I think at the end of the day the decision to pull out of the JCPOA without a strategy of how to move forward and make sure that Iran couldn't get closer to a weapon left us at the point we are in today: Iran literally at the goal line. And that is the challenge we have.

Now, part of the problem I think in pulling out of the JCPOA was there wasn't a plan, that it was more about the headlines than about making actual progress. It was not very serious. And this has been a challenge that I have seen with the administration, first term of the Trump Administration, and today with the return of the administration perhaps even greater.

The dismantling of USAID, the freezing of aid to camps like Al-Hol where Isis remnants remain active, the whiplash of threats followed by back-channel talks with Hamas, all of it suggests a governing style that is far more impulsive, theatrical, and dangerously un-tethered from strategy. I wish we could trust that this renewed maximum pressure approach being discussed was grounded in facts, deliberation, and interagency coordination. I wish I believed that President Trump had read the briefings, sought our dissenting views, or agonized over the details of a strike plan, but I don't have that confidence and I am very concerned about where we are right now.

Serious policy means aligning sanctions, intelligence, and diplomacy. It means working with allies to close loopholes, not just naming problems, but resourcing, developing solutions. It means being honest about what air strikes can and cannot accomplish and about what it takes to truly dismantle Iran's nuclear weapons program.

We know this challenge won't get easier with time, as has been discussed earlier. Iran's nuclear program isn't just a bargaining chip; it is a shield from behind which Tehran wages war through proxies in Gaza, Lebanon, Iraq, Syria, and Yemen. And that is why I was proud last Congress to join with then Chairman McCaul to introduce H. Res. 559 declaring it the policy of the United States

that a nuclear Islamic Republic of Iran is not acceptable under any circumstances.

So with that, let me turn to you, Ms. Stroul. You have spoken previously about the need for regional architecture. Can you speak our seriously you think our Gulf partners view the risk of a nuclear Iran and whether they believe the U.S. is still—or U.S. does have at all a coherent plan to stop it?

Ms. STROUL. Thank you so much for that question, Congressman. Many of our Gulf partners are hedging because they are uncertain as to what U.S. commitments are and whether or not U.S. commitments to the region and to their defense will be enduring. So almost every U.S. partner in the Gulf has pursued their own rapprochement with the Iranian regime, exchanging Ambassadors, maintaining economic relations, as well as very consistent diplomatic engagement back and forth.

We are using some of these channels for the passing of messages, but the bottom line is if there is going to be military strikes used against Iran, we are going to need the support of our partnership the Gulf, we are going to need flexibility with the bases we have where U.S. forces are present, and we are—and if we are going to achieve a negotiated settlement, Iran is going to need to hear from our partners in the Middle East that they are as serious about getting to a negotiated settlement that blocks all Iranian pathways to a nuclear weapon as Washington is. And those are some of the I think security commitments both to their self-defense and to our long-term commitment in developing this regional architecture that could benefit from clarification at this moment in time.

Mr. SCHNEIDER. Thank you. I have gone over time.

Ms. KIM. Thank you, Ms. Stroul.

Mr. SCHNEIDER. I appreciate the extension. I yield back.

Ms. KIM. Of course. I know recognize Mr. Kean, Representative Kean from New Jersey for 5 minutes.

Mr. KEAN. Thank you, Madam Chairwoman. And thank you to our witnesses for being here today.

Mr. Roule, what type of support is Russia providing Iran's nuclear program and what role is Russian State owned energy giant Rosatom playing and supporting Iran's nuclear ambitions?

Mr. ROULE. Russia's role in the joint comprehensive plan of action was limited to support for the Bushehr civilian nuclear power plant on Iran's southwest coast. The development of that plant, there were discussions on the—perhaps building of other nuclear power plants in country and part of the deal under JCPOA was that, in essence, Iran would send spent nuclear fuel in Russia in exchange for fresh nuclear fuel. Now that, of course, stopped when Iran ceased to do this.

I think the most important question is whether Russia is providing Iran with capabilities to allow it to move closer to a nuclear weapon? Now there is no public information of which I am aware that that is occurring. And it is also a fact, however, that Russia does have a presence in country through Bushehr and that were we to have a multi-lateral negotiation with Iran on its nuclear program, Russia would be a prominent part because of that element. China, as well, because of China's role with the Iraq power plant, its former plutonium plant which is due to come online in 2026.

Mr. KEAN. And what types of support is Russia currently providing Iran's proxies? And what does Russia hope to gain from its outreach to the Houthis and what might trigger the Kremlin to step this support up or decrease it?

Mr. ROULE. There have been reports that Russia has attempted to provide weapons to the Houthis and that diplomatic pressure from regional actors have prevented this and Russia may have told these actors that the purpose of this support was to complicate the lives of western powers who were supporting Ukraine. There has also been some reporting of Russian weaponry that has found its way to Hezbollah, although the evidence of Russia's direct engagement with Hezbollah is more tenuous and Russia has, of course, provided intelligence engagements with its counterparts in Iran on how to defeat western intelligence.

Mr. KEAN. So in your view what, therefore, does the Iranian regime hope to gain from its increasingly cozy relationship with the Kremlin and what threats does that pose to U.S. national security priorities?

Mr. ROULE. Although Russia is a sometimes competitor with Iran, it is a malign actor. It has blocked all pressure on Iran at the United Nations. So for example, regarding Yemen, Russia has made sure that there has been no significant investigation of Iran's support for the Houthis at the United Nations for many years. So Russia's support for Iran is significant. It is malign. It is pervasive. And it impacts global economy.

Mr. KEAN. Are there points of friction within that bilateral relationship that the U.S. could effectively exploit?

Mr. ROULE. I am not aware of any, but Dana, do you have anything you would like to add on that?

Ms. STROUL. I think the bottom line here is that Russia and Iran share the objective of challenging the United States, our influence, and our investment in the current global and international order. And that strategic convergence is stronger than any wedge we might want to draw between the two.

Mr. KEAN. Thank you, all, for your testimony here today and I yield back.

Ms. KIM. Thank you. I now recognize Representative Amo from Rhode Island for 5 minutes.

Mr. AMO. Thank you, Madam Chair, and thank you to our witnesses for being here. I know it has been a little while that you have been sitting there.

Ms. Stroul, good to see you again. The last time we were here was last April and I discussed with you the growing cooperation between Ayatollah Khomeini and Vladimir Putin. And back then, we saw Iran transfer drones to Russia. The same Iranian drones which were turned on Israel were used by Putin to attack Ukraine. One year later, Putin's drones are still taking the lives of innocent civilians and the ties between Russia and Iran have grown stronger.

Earlier this year, Russia and Iran signed a 20-year strategic partnership treaty with a military cooperation agreement. And the duo has expanded to include a third, Xi Jinping's China. In March, warships from all three countries conducted joint naval exercises in the Gulf of Oman, the strategic corridor for more than one quarter

of the world's seaborne oil. That same week, China hosted Russia and Iranian diplomats to discuss Iran's nuclear program.

So in the aftermath of Trump 1.0 and the withdrawal of commitments to contain Iran by leaving the JCPOA, Iran has continued in its acceleration of its development of its nuclear program. Now as we are in Trump 2.0, as President Trump continues our surrender on the global stage, as we have seen in the last 70 plus days, China is racing to fill that vacuum. Xi is strengthening Iran's hands, thanks to Trump's retreat.

The annual threat assessment of the U.S. intelligence community released last month found that China, Russia, and Iran were three of the largest foreign threats to the United States.

Ms. Stroul, what actions should President Trump continue from the Biden administration to deter this growing alliance and ensure that Russia and China do not continue to help Iran evade sanctions?

Ms. STROUL. Thank you so much for that question, Congressman. Good to see you as well.

What we have seen since last year is continued coordination and strategic convergence across Russia, Iran, China, and sometimes North Korea. So it is diplomatic protection of Iran at the U.N. Security Council and across many international institutions. It is not just exchanging lessons learned on how to evade sanctions. It is also deeper economic cooperation, working on how to de-dollarize their economies, how to increase banking transactions between these different capitals to make themselves less exposed to U.S. sanctions. It is increasing exchanges in sophisticated defense technology. It is the military exercises, as you note, and then it is even trading and exchanging lessons learned on how to exert domestic control inside their countries, to suppress human rights and popular protests, not to mention nuclear cooperation.

So all of this requires a whole of government approach from the administration. It is investing in our unmatched network of allies and partners in order to counter this access. It is restoring the elements of U.S. soft power, USAID investing in our diplomats in order to counter the diplomatic actions of these different malign actors. It is strengthening our foreign military sales processes, our own military exercises, our own defense and security cooperation in order to counter that, and also making sure that we continue to have the most professional U.S. military in the world because partners and allies should want to do military exercises with us, not with Russia or China.

Mr. KEAN. And Ms. Stroul, with my remaining time, what can we do or what changes can we make to disrupt the growing ties between a lot of those points that you just referenced on how we engage with our partners and our allies, but what can we do to disrupt the close ties between Iran, Russia, and China as this connection grows even stronger in their opposition to us?

Ms. STROUL. We are going to have to disincentivize the interests of those leaders and in those capitals to deepen their coordination with each other, to make it less attractive to do that and for them to perceive that the consequences of that deeper coordination that run counter to U.S. interests will be more painful than pursuing this course. And again, it means demonstrated resolve to maintain

U.S. military partnerships, to invest and provide security assurances, and support for the defense of our allies and partners so that they are working with us and not hedging toward this other access and it is fielding a strong diplomatic corps and a strong network of development professionals.

Mr. KEAN. Thank you. I yield back.

Mr. MILLS. [Presiding.] Thank you. At this time, I recognize I recognize myself. I am unfortunate that my colleague left with his JCPOA binder as that would have been very helpful. We have got a small chair in the back that is a little bit wobbly and that is about the only thing you could have put under it to actually stabilize it, since there is nothing to stabilize Iran.

Ms. Stroul, you really love the quick fire, rapid fire stuff when it came to the Biden administration. I kind of want to follow suit here, if you will, and I want to make this quick. Did oil exportation increase under the Biden administration?

Ms. STROUL. Sanctions enforcement is an area that could have been improved.

Mr. MILLS. Did it increase under the Biden administration? Yes or no?

Ms. STROUL. Chinese purchase of discounted Iranian oil increased under the previous administration.

Mr. MILLS. Okay, did Biden delist the Houthi rebels?

Ms. STROUL. Yes.

Mr. MILLS. Did that disrupt 12 percent of global trade through the Red Sea?

Ms. STROUL. The delisting itself was not the cause of the disruption of the global trade.

Mr. MILLS. Did the increase in actual tax as a result of delisting the Houthis increase the amount of disruption of global trade through the Red Sea resulting in 12 percent of global trade being disrupted?

Ms. STROUL. Iranian provision of support to the Houthis is part of the—

Mr. MILLS. Did the unfreezing of assets and the increase of oil trade give more money to Iran to be able to fund proxy militias?

Ms. STROUL. I can't speak to the exact fungibility of the—

Mr. MILLS. I actually thought that was your job. Did the currency of the Iran—the rial go up in value versus the dollar during the time the Biden administration was in place?

Ms. STROUL. My colleague would be better positioned on that.

Mr. MILLS. I will allow you to answer.

Ms. STROUL. Yes.

Mr. MILLS. Yes, it did because under max pressure it is at about a million rials to the dollar, something we haven't seen in a long time.

So I noticed that you had a lot of really quick, rapid fired things in the previous administration, but not a whole lot when it came to the increase in maximum pressure that actually resulted in the Iranian regime reducing the amount of attacks that it has right now.

Wasn't it the Biden administration that actually requested the IDF and Israel to launch themselves into a cease-fire for negotiations?

Ms. STROUL. I can't speak to the specifics of that. What I know—

Mr. MILLS. Well, the answer is yes. And had they done that, we wouldn't have eliminated Hassan Nasrallah of Hezbollah. We would not have eliminated Sinwar. We would not have eliminated many of the actual terrorist organization leads that has basically been put in place and enforced to grow stronger as a result of the weakness that the administration have shown.

Look at what we have today. We talk all the time about how Russia, we are so weak on Russia, but was it not the Trump administration actually removed us from the failed INF treaty, something that no other administration was willing to do before? Was it not the JCPOA that both General Secretary Ban Ki-moon and Guterres said had been violated when Iran was still shipping mid-range ballistic missiles to the Houthis when they were launching against Saudi Aramco?

This is preposterous to even assume that the Biden administration had done anything to prevent the enrichment of nuclear that the JCPOA or Jake Sullivan or any of the others had done anything that would weakened the regime.

I want to be very clear. There is a difference and I think it is important to always point out the differentiation of this. There is a difference in the regime and the Iranian people. The Iranian people want a free Iran. I can tell you that those who are bravely protesting in the streets, those who are continuing to try and risk their lives every single day like Mahsa Amini did to say enough is enough shouldn't be lumped in so when our colleagues very recklessly just says Iran, I think that that is a very big misnomenclature and I want to correct that for the record.

I want to go into sanction enforcements. Do you feel, Ms. Jungman, that sanctions were enforced under the Biden administration?

Ms. JUNGMAN. Not until late 2024.

Mr. MILLS. And do you feel that Iran is at a stronger or weaker position right now than they were previously?

Ms. JUNGMAN. As a result of the sanctions that have been rolled out over the last few months and at the end of 2024, they are weaker, but not as weak as they could have been if sanctions were fully enforced under the Biden administration.

Mr. MILLS. I completely agree. And what I notice from Iran is that not only are they concerned about this administration more so than the last, they have actually moved and relocated their surface-to-air missiles around Qom, around Natanz, around Isfahan because they know that unlike the Obama-Biden drawn red line that this administration has actually proven to take real enforcement.

Do you think, Mr. Norman, that if we actually—not actually hurting or impacting or having a lot of collateral damage as you would if you hit cities like Tehran or others, but went after the nuclear facilities, that would send a direct message to the regime that we will not continue to play weak with them?

Mr. ROULE. It certainly would send a powerful message to the regime that we would not play weak with them, sir.

Mr. MILLS. And I think that that is really what this administration has proven, both in the first administration and now is that we are not going to continue to play weak with our adversaries. The China, Russia, Iran, North Korea geopolitical alignment has grown stronger in the previous regime and as President Trump and this administration is continuing to try and make the necessary steps to enforce sanctions to guarantee that we re-list the Houthis, to stop the sea of navigation from being disrupted and to actually for once and for all actually see that the Iranian people have support from the United States, overthrow a regime that has been a dictatorship, tyrannical, and continue to do but only build and embolden themselves under the Biden administration.

With that, I will now recognize if it pops up here and I am not sure they are updating it. There we go, we will recognize the gentlelady from Pennsylvania, Ms. Dean.

Ms. DEAN. Thank you, Mr. Chairman. Bear with me, and let's restart the clock, please.

Mr. MILLS. Restarted the clock.

Ms. DEAN. Thank you very much. I thank Chairman Mast and Ranking Member Meeks for holding this hearing and I thank all of you, your expertise, your passion, and your intellect around these issues. It is very valuable to us in these incredibly challenging times.

Going back to the JCPOA, in 2015, the P5+1, the EU, and Iran agreed to the JCPOA choosing diplomacy over aggression to ensure that Iran's nuclear program would be peaceful, constrained. The JCPOA was an historic deal in ensuring verification and compliance and the IAEA had previously warned that its failure would be a loss for nuclear verification and multi-lateralism. Unfortunately, in 2018, even though the IAEA verified that Iran was implementing its nuclear-related commitments, President Trump, in my mind, recklessly withdrew the United States from the JCPOA and without a plan as my colleagues, Mr. Schneider, spoke about.

Mr. Roule, I would like to go back to the very beginning of your testimony. It is stunning testimony that I think bears repeating. You said in page 1 and page 2 first the IAEA notes that Iran continues to expand its production of 60 percent enriched uranium. Is that correct?

Mr. ROULE. That is correct, ma'am.

Ms. DEAN. You say Iran appears capable of producing its first quantity of 90 percent enriched uranium. Can you speak to that? What leads us to know that?

Mr. ROULE. That is based on International Atomic Energy Agency's access to Iran's nuclear program at present which is limited, but it still takes place.

Ms. DEAN. And when you use the expression, as experts do, they would have the possibility of 90 percent enriched uranium sufficient for one nuclear weapon in about a week, what does about a week mean to a layman like me?

Mr. ROULE. Well, it means they have centrifuges which spin gas and basically produce highly enriched uranium that would then have to be converted into material for a warhead that could then be used as a weapon. This is the first stage of that process so this is before the warhead construction starts. So they don't have a

weapon. They just have the material that would begin the process toward the weapon. So they don't have a bomb, but they have the fissile material that would then begin the process for a weapon.

Ms. DEAN. What stages were they at prior to President Trump removing the United States from JCPOA? What were the numbers then?

Mr. ROULE. They had a very, very tiny amount of enriched uranium at a level that was much, much reduced to this—it was below 5 percent. They had a very small number of centrifuges. But I should also say, ma'am, that when President Trump left JCPOA, they did not significantly increase their centrifuge production until, frankly, diplomatic talks began under the Biden administration. It wasn't because of the Biden administration itself. It was just because the Iranians just decided to expand their program even when diplomacy was offered.

Ms. DEAN. And then you said, let me see here, second, you said Iran continues to increase the number and sophistication of its centrifuge cascade. Can you speak to that a little bit?

Mr. ROULE. Yes. In essence, the centrifuges have—the more advanced the centrifuge is, the greater efficiency, the faster it can produce highly enriched uranium and what that means is the faster it can produce the fissile material for a weapon. And the faster it can produce something means the fewer number of centrifuges which means the footprint is smaller, it means the smaller the installations can be and easier you could hide it.

So in essence, Iran's nuclear architecture right now appears to be designed to produce the highest enriched uranium in the fastest way possible and not the lowest enriched uranium in just an average speed possible. So it is not producing enriched uranium in a way that you would expect for a civilian nuclear program. It is also producing this enriched uranium in centrifuge cascades, in facilities that are deeply buried that look as if they are designed to survive a military attack. That is all very suspicious.

Ms. DEAN. Very suspicious. I see my time is up. Where does this leave our partners, our former partners in the JCPOA, if you could answer that?

Mr. ROULE. Well, Europeans have been attempting to revive negotiations for some time without success, in part because the Iranians themselves refuse to cooperate in negotiations as they refused to cooperate under the Biden administration, which is why then the Secretary of State in the Biden administration called the negotiations to an end.

Ms. DEAN. I thank you very much all of you. I am sorry I wasn't able to get to everybody. Thank you. I yield back.

Mr. MILLS. Thank you. At this time, we recognize our good friend from Texas, Mr. Self, for 5 minutes.

Mr. SELF. Thank you, Mr. Chairman. In 2015, President Obama flew a plane with \$400 million in cash to the Ayatollah and released billions more. In 2021, President Biden rescinded President Trump's maximum pressure campaign, as we have heard. They went from like \$4 billion, I think in reserves, to somewhere around \$100 billion today, perhaps more.

We have suffered through multiple inept leadership in terms of Iran and now we have a strong commander in chief who sees max-

imum pressure working. However, as an Article 1 branch of government, Congress must have jurisdiction over sanctions. Some say so over the sanctions for Iran and for any future administration. That is why I have reintroduced the Iran Sanctions Relief Review Act which passed the House last session, but my bill will give us a seat at the table and the American people a voice and view. We must strengthen Congress' hand to produce future generations from emergency existential threats to our Nation's survival and the Iranian nuclear weapon might do that. We have a duty to do that.

So I want to start with you, Mr. Roule. What is the center of gravity of the Iranian nuclear program? Is it the warhead? Is it the guidance system? Is it the missile itself? Is it the facilities? Is it the potential for software from your years in the CIA? What is the center of gravity?

Mr. ROULE. It is a broad, federated program that exists in many locations across a broad geography. For many years, the center would have been the development of fissile material, but as we just discussed, that is produced at a number of locations at a very advanced rate at present, so understanding their number of centrifuges, their production rate of highly enriched uranium is the most important aspect of the program at present.

Mr. SELF. So you think they can quickly link the material with a guidance system with a missile because they never tested this, did they?

Mr. ROULE. No, sir. I didn't say that.

Mr. SELF. Okay.

Mr. ROULE. But it is unlikely they would be able to do quickly or efficiently in my view. They have not done that and in the time it would take for them to do that, it depends upon the amount of testing, how quickly and securely they would wish to do that. And the metallurgy to shape a warhead, and by the way, that is also saying they decide they wouldn't put it into a gravity bomb into an airplane or some other system to deliver it.

Mr. SELF. Or sneak it into a port somewhere.

Mr. ROULE. Or sneak it into a port, sir. But at this point, it is the creation of fissile material in the enrichment program.

Mr. SELF. Interesting. I would have said it would have been the building of an actual warhead on a missile.

But anyway, Ms. Jungman, we know that the Ayatollah stopped the program, supposedly in early 2000. He is now, what 86, 87 years old. Do you think that they may be doing something behind his back, seeing that his days are numbered? What are the chances that is happening that somebody surreptitiously is moving the nuclear program forward?

Ms. JUNGMAN. Unfortunately, that is not my area of expertise. I am going to defer to my colleagues.

Mr. SELF. Okay. Mr. Roule, I think you have been nominated.

Mr. ROULE. Minimal.

Mr. SELF. Minimal.

Mr. ROULE. Minimal. It is not how the country works. It is a very small circle of people and it is extremely unlikely something like that would happen without his knowledge.

Mr. SELF. Okay, very good. So regime change. I have heard that discussed here. I think that is a horrible concept because we

haven't defeated a nation for decades now, but we do know that there have been several uprisings in Iran and they are put down brutally. So how in the world do we encourage the people of Iran to actually go through the pain to change the regime? Is that possible? Because we are assuming some external force, U.S. or somebody else, will have to make this happen because if we do have a successor to the Ayatollah standing in the wings, how do we encourage them to do this themselves?

Mr. ROULE. The people of Iran need to know that America stands with them, but we need to be very careful and cautious as to how we do this because people are risking their lives. They will pay a terrific price in the prisons of Iran, the hands of Iran's extraordinarily cruel security forces when they are punished. And we need to be very careful that we don't—we aren't too cavalier about how this is handled. It is up to the people of Iran to determine their future and as they do take steps to change that future, they need to know that we will support them and perhaps even provide safe haven if they need security if it is in such a situation. But we just need to be careful on how we move forward because if there is a situation where they are caught in the hands of Iran's security, they will be handled very roughly.

Mr. SELF. Thank you. I yield back.

Mr. MILLS. Thank you. At this time, we recognize the Representative of Delaware, Rep. McBride.

Ms. MCBRIDE. Thank you, Mr. Acting Chairman. Thank you very much to our witnesses for your perseverance with us today.

Around the world, we are watching a clash unfold between democratic values and authoritarian oppression, from Europe to the Middle East, to this very continent. This is the story of our moment, democracy versus authoritarianism. Iran sits at the center of a growing alliance of authoritarianism, an access that includes not only hostile nation states like Russia and China, but also a network of terrorist organizations and armed militias across the Middle East. Iran props up groups like Hamas, Hezbollah, and the Houthis, using them as tools to destabilize democracies and challenge U.S. interests. This is a part of Iran's global strategy to withstand authoritarian influence and erode the norms of international law and human rights. And while we sit here warning of Iranian malign activities, President Trump's national security team has been carelessly handling classified and mission-sensitive information about the Houthis in open.

The problem isn't just that they mistakenly added a reported to a text chain. The bigger problem is that these officials, some of the most surveilled people on the planet, were communicating in a way that allowed that mistake to even happen. How many Signal chats contained sensitive or classified material right now? How many have occurred over the last several months? Reporters may have not been able to see them, but Iran, Russia, and China very easily could.

It is entirely possible that Iran or one of its partners was following along on the Signal chat that we know about and because of that, it is a miracle that we are not mourning dead American troops right now. Had there been retaliation waiting in response because of that breach, that could have handed the

Houthis and Iran a major victory. That is not just embarrassing, it was dangerous.

As Hamas is weakened and Iran looks to recalibrate its strategy, we must ensure that Iran does not have additional proxies to fall back on. I am proud to co-lead the bipartisan, Bicameral Accountability For Terrorist Perpetrators of October 7th Act introduced by my colleagues, Representatives Sherman and Lawler which would finally sanction the Popular Resistance Committees, a brutal terrorist organization in Gaza and an active participant in the horrific attacks in Israel on October 7th. These terrorists have carried out attacks against Americans, Israelis, and Palestinians for decades and their deep ties to Hamas make them a credible candidate for Iran if they are looking to increase support for other proxies in the region.

So Mr. Roule, my question for you is despite having been responsible for American civilians being murdered since 2003, the Popular Resistance Committees has never been sanctioned. As Iran's adjusted strategy in response to the weakening of its primary proxies, how should the U.S. Government and our allies monitor and preempt the rise of new or lesser known Iranian-backed groups that could fill the vacuum?

Mr. ROULE. Superb question. I go back to a previous statement. As long as the Quds Force exists as an organization created to sponsor militias and terrorists, we will see more and more of this. There are Quds Force training camps in Iran designed to train multi-national terrorists to, in essence, go out and become train the trainer individuals. Some of the best training Iran provides to the Houthis, to Hezbollah and others is provided within Iran itself. Until Iran is compelled to change the Quds Force itself, we are fated to deal with this issue.

So I would encourage legislation that insists that our partners in Europe and the region can do what they can to constrain Iran's—from the Quds Force's activity. Until this happens, we are fated to watch this movie play again and again.

Ms. MCBRIDE. Thank you. And quickly, Ms. Stroul, given Iran's strategy of using proxies, destabilized fragile democracies, and suppressed civil society from Lebanon to Iraq, how can the U.S. more effectively support democratic institutions and counteract the malign influence of these authoritarian-backed actors?

Ms. STROUL. The ability of societies and communities to be resilient in the face of what the Iranians will try to do which is reconstitute their threat network is to empower our diplomats and our development assistance professionals. So that would particularly be the U.S. Agency for International Development and to allow our diplomats to do what they do best which is political and diplomatic engagement.

Ms. MCBRIDE. Thank you, I yield back the balance of my time.

Mr. MILLS. Thank you, I would remind, just for clarification, Rep. McBride, that those sitting in the chair are chairman or chairwoman, there is no acting and so I would assume we know the difference between real and acting. And at this time, I will recognize the gentleman from Indiana, Mr. Shreve.

Mr. SHREVE. Thank you, Mr.—gentleman in the chair. I appreciate the testimony from the witnesses. I know we have spent a long afternoon and I appreciate that.

Ms. Jungman, nearly 3 hours ago, as we opened up, you discussed the establishment of a global maritime no dock list as a means of curtailing this shadow fleet. What might the U.S. do to encourage other countries to uphold this no dock list at their ports?

Ms. JUNGMAN. Thank you for bringing that up and thank you for the question. I think it is important to recognize again that there are western entities touching the vessels involved in this activity, whether that is the Classification Society, the flag State. The Classification Society, for example, have offices here in the U.S. or the flag states provide the flags to these vessels, we can essentially say none of their vessels would be able to sail to the U.S. For example, if that is Panama or Comoros or Cook Islands, if we said if you are going to flag these vessels, your vessels will not be able to come to the U.S. So I think there is a number of different ways that we can encourage them, but essentially the thought behind the no sail list or kind of monitored off a no-fly list is that the enforcement of sanctions can take time and having this list of vessels that are involved in this type of activity would send a warning and hopefully deter them from off-loading their oil at different areas.

Mr. SHREVE. So that deterrence would be second hand. They can't prescribe those vessels on the no dock list directly at foreign ports, but we could get to the bad actor states by prohibiting their docking into our ports? Is that a fair characterization?

Ms. JUNGMAN. Yes.

Mr. SHREVE. All right, well, thank you. Thank you, sir, I yield back.

Mr. MILLS. Thank you so much. At this time, we recognize the gentlelady from South Carolina, Rep. Biggs.

Ms. BIGGS. Thank you, sir, and thank you to our witnesses for being here today.

So the denuclearization of Iran remains a cornerstone of U.S. policy and it is critical to ensuring regional stability and global security given Iran's history of pursuing nuclear capabilities that threaten its neighbors and international communities. The Obama administration's Iran nuclear deal, the JCPOA, notably failed to achieve this goal as it allowed Iran to retain significant nuclear infrastructure and did not mandate the verifiable dismantlement of its nuclear weapons program. Moreover, the Obama administration sought to obligate the United States to remove key sanctions on Iran, notably those with Section 1245 of Fiscal Year 2012 NDAA, which enforced significant financial and oil restrictions. The Obama administration's agreement boiled down to a trade which simply stated temporary nuclear restriction in exchange for permanent sanctions relief.

Yet, these efforts fell well short of the denuclearization standard mandated by the CIFADA, a bill signed into law by President Obama, which explicitly requires Iran to cease the pursuit, acquisition, and development of nuclear weapons and to dismantle its nuclear program as one of a number of conditions terminating significant U.S. sanctions. The law's mandate is clear and indisputable and Obama administration's agreement failed significantly short

raising serious concerns about its effectiveness and security implications for the United States and for our allies.

Only strict adherence to the law will ensure the permanent removal of nuclear threat from Iran.

So my question is simple. To each of our witnesses, I just want to know does anyone disagree with this fundamental principle?

And I will start with Mr. Roule.

Mr. ROULE. Sorry, ma'am, could you give it a question, please?

Ms. BIGGS. I just want to know if you disagree or agree with this fundamental principle.

Mr. ROULE. Of?

Ms. BIGGS. What I just stated about what the Obama—how we fell short and how it affects us now.

Mr. ROULE. You are correct, ma'am. The JCPOA provided a permanent sanctions relief and permanent relief of a number of restrictions in return for, in many cases, a temporary or finite restrictions on Iran's nuclear program and with a government of malign individuals who sponsored proxies, did a number of oppressive activities against their own people, and led us to the current State where we are today.

And if I can just go a little farther, in essence, the problem with JCPOA is it has become an issue about us and when it should be an issue about Iran. OK? This was Iran's chance to turn a new chapter of history and it didn't. And it is Iran's fault, OK? And that is the issue here. So yes, ma'am.

Ms. BIGGS. Thank you.

Ms. JUNGMAN. I would agree with the comments made by Mr. Roule.

Ms. STROUL. I would also agree and I think it is even more important that whatever deal is contemplated and negotiated, this has to be much stronger than the JCPOA, particularly because of the perilous advances in Iran's nuclear program today.

Ms. BIGGS. Absolutely. I believe that is why our past is so important to pay attention to as we move forward. And thank you to our witnesses. And I yield back my time.

Mr. MILLS. Thank you so much. I want to thank our witnesses for their valuable testimony and the members for their questions. Members of the committees may have some additional questions for the witnesses and we may ask you to respond to these in writing.

Pursuant to committee rules, all members may have 5 days to submit statements, questions, and extraneous materials for the record, subject to the length limitations.

Without objection the committee stands adjourned.

[Whereupon, at 5:17 p.m., the committee was adjourned.]

APPENDIX

MATERIAL SUBMITTED FOR THE HEARING RECORD



Chairman Brian Mast

**COMMITTEE ON FOREIGN AFFAIRS
FULL COMMITTEE HEARING NOTICE
U.S. HOUSE OF REPRESENTATIVES
WASHINGTON, DC 20515-6128**

Brian J. Mast (R-FL), Chairman

March 26, 2025

Revised

TO: MEMBERS OF THE COMMITTEE ON FOREIGN AFFAIRS

You are respectfully requested to attend an OPEN hearing of the Committee on Foreign Affairs to be held at 2:00 p.m. in room 2172 of the Rayburn House Office Building. The hearing is available by live webcast on the Committee website at <https://foreignaffairs.house.gov/>.

DATE: April 1, 2025

TIME: 2:00 p.m.

LOCATION: 2172 RHOB

SUBJECT: A Return to Maximum Pressure: Comprehensively
Countering the Iranian Regime's Malign Activities

WITNESSES: Norman T. Roule
Non-resident Senior Advisor
Warfare, Irregular Threats, and Terrorism Program
The Center for Strategic and International Studies

Claire Jungman
Chief of Staff
United Against Nuclear Iran

** Ms. Dana Stroul
Director of Research
Shelly and Michael Kassen Senior Fellow
The Washington Institute for Near East Policy*

*NOTE: Witnesses added/changed.

**NOTE: Witnesses may be added.

By Direction of the Chair

The Committee on Foreign Affairs seeks to make its facilities accessible to persons with disabilities. If you are in need of special accommodations, please call 202-226-8467 at least four business days in advance of the event, whenever practicable. Questions with regard to special accommodations in general (including availability of Committee materials in alternative formats and assistive listening devices) may be directed to the Committee.

COMMITTEE ON FOREIGN AFFAIRS
MINUTES OF FULL COMMITTEE HEARING

Day Tuesday Date April 1, 2025 Room 2172 RHOB

Starting Time 14:33 Ending Time 17:17

Recesses ☐ (___ to ___) (___ to ___) (___ to ___) (___ to ___) (___ to ___) (___ to ___)

Presiding Member(s)

Chairman Mast, Rep. Lawler, Rep. Kim, Rep. Mills

Check all of the following that apply:

Open Session ☒

Executive (closed) Session ☐

Televised ☒

Electronically Recorded (taped) ☒

Stenographic Record ☒

TITLE OF HEARING:

A Return to Maximum Pressure: Comprehensively Countering the Iranian Regime's Malign Activities

COMMITTEE MEMBERS PRESENT:

Attached

NON-COMMITTEE MEMBERS PRESENT:

NA

HEARING WITNESSES: Same as meeting notice attached? Yes ☒ No ☐

(If "no", please list below and include title, agency, department, or organization.)

STATEMENTS FOR THE RECORD: *(List any statements submitted for the record.)*

None

TIME SCHEDULED TO RECONVENE _____

or

TIME ADJOURNED 17:17

Meg Wagner

Full Committee Hearing Coordinator

Committee on Foreign Affairs
119th Congress

ATTENDANCE

Meeting on: A Return to Maximum Pressure: Comprehensively Countering the Iranian Regime's
Malign Activities

Date: April 1, 2025

Representative	Present	Absent	Representative	Present	Absent
Chairman Mast	X		RM Meeks	X	
Rep. McCaul	X		Rep. Sherman	X	
Rep. Smith	X		Rep. Connolly		X
Rep. Wilson	X		Rep. Keating	X	
Rep. Perry	X		Rep. Bera	X	
Rep. Issa	X		Rep. Castro	X	
Rep. Burchett		X	Rep. Titus		X
Rep. Green		X	Rep. Lieu		X
Rep. Barr		X	Rep. Jacobs		X
Rep. Jackson		X	Rep. Cherfilus-McCormick	X	
Rep. Kim	X		Rep. Stanton	X	
Rep. Salazar		X	Rep. Moskowitz	X	
Rep. Huizenga	X		Rep. Jackson		X
Rep. Radewagen		X	Rep. Kamlager-Dove		X
Rep. Davidson	X		Rep. Costa	X	
Rep. Baird	X		Rep. Amo	X	
Rep. Kean	X		Rep. Mfume	X	
Rep. Lawler	X		Rep. Jayapal	X	
Rep. Mills	X		Rep. Latimer		X
Rep. Self	X		Rep. Olszewski	X	
Rep. Zinke	X		Rep. Johnson	X	
Rep. Moylan	X		Rep. McBride	X	
Rep. Luna		X	Rep. Schneider	X	
Rep. Shreve	X		Rep. Dean	X	
Rep. Biggs	X				
Rep. Baumgartner		X			
Rep. Mackenzie	X				