



Statement of

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Before

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Hearing on

Moving the Money: Understanding the Iranian Regime's Access to Money Around

the World and How They Use It to Support Terrorism

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Congressional Research Service 7-5700 www.crs.gov <Product Code> Chairman Huizenga, Ranking Member Green, and Members of the Subcommittee:

Thank you for inviting the Congressional Research Service to testify today. My statement provides an overview of Iran's funds abroad, starting with a brief description of the U.S. sanctions authorities that affect the use of those Iranian funds, then outlining the Biden Administration's decision earlier this year to waive restrictions to facilitate the transfer of \$6 billion of those Iranian funds from South Korea to Qatar to pay for humanitarian goods for Iran. I will also discuss similar arrangements related to Iraq, options for Congress, and the possible implications of those options.

#### Background: U.S. Sanctions and Iranian Assets Abroad

The U.S. government has for decades sought to limit the Iranian government's financial resources via sanctions in an effort to deprive the government of the ability to fund its programs to develop weapons of mass destruction and related delivery systems; nuclear activities; and support of terrorist groups. These efforts have included sanctions directly on Iranian government assets and Iran-associated entities, as well as secondary sanctions to deter third parties from engaging in transactions with or for the benefit of the government of Iran. In the 1996 Iran Sanctions Act (P.L. 104-172), the first imposition of secondary sanctions related to Iran, Congress declared

that it is the policy of the United States to deny Iran the ability to support acts of international terrorism and to fund the development and acquisition of weapons of mass destruction and the means to deliver them by limiting the development of Iran's ability to explore for, extract, refine, or transport by pipeline petroleum resources of Iran.<sup>1</sup>

The question of Iran's access to funds abroad has received particular attention since 2011 when Congress passed legislation to sanction foreign financial institutions that engage in transactions with the Central Bank of Iran (CBI) or other designated Iranian financial institutions, with an exception for the financial institutions of countries determined to be significantly reducing their imports of Iranian petroleum (the significant reduction exception, or SRE).<sup>2</sup> One supporter of the measure described it as "one of the few remaining actions, short of an embargo of Iranian shipping and military intervention, to slow or end the Iranian nuclear program."<sup>3</sup> The State Department issued the first SRE determination in March 2012.<sup>4</sup>

The next year, Congress expanded the restriction by requiring excepted foreign buyers to deposit payments for petroleum imports in financial institutions located in the purchasing country, rather than remitting such funds to Iran, to avoid sanctions.<sup>5</sup> That legislation effectively blocked Iranian funds abroad, since third country financial institutions proved unwilling to transact with Iranian counterparts and funds accrued in accounts outside of Iran. The status and use of those funds abroad have become the subject of considerable speculation. Many observers describe these assets as blocked by the United States. Their availability to Iran is restricted by foreign financial institutions seeking to comply with the U.S. Iran sanctions program and avoid becoming potential targets for U.S. secondary sanctions.

In accordance with statute, the U.S. government has permitted the use of blocked funds for humanitarian trade.<sup>6</sup> According to U.S. Department of the Treasury guidance issued in 2013, in order for depository

<sup>&</sup>lt;sup>1</sup> 110 Stat. 1541, 50 U.S.C. §1701 note.

<sup>&</sup>lt;sup>2</sup> 125 Stat. 1298, 22 U.S.C. §8513a.

<sup>&</sup>lt;sup>3</sup> Senator McConnell, Congressional Record – Senate, November 17, 2011, S7639.

<sup>&</sup>lt;sup>4</sup> The countries in the first SRE determination were Belgium, Czech Republic, France, Germany, Greece, Italy, Japan, Netherlands, Poland, Spain, and the United Kingdom. See U.S. Department of State, "Statement on significant reductions of Iranian crude oil purchases," March 20, 2012. Subsequent determinations were made for India, Malaysia, South Korea, South Africa, Sri Lanka, Turkey, and Taiwan on June 11, 2012, and for China and Singapore on June 28, 2012.

<sup>&</sup>lt;sup>5</sup> 126 Stat. 162, 22 U.S.C. §8801 note.

<sup>&</sup>lt;sup>6</sup> 22 U.S.C. §§8513a(d)(2); 8806(c); 7205.

institutions to avoid sanctions, the restricted funds they hold must only (1) be used to directly pay for Iranian purchases of goods and services from the third country or (2) be deposited in "special purpose accounts," "set up with conditions and safeguards that require the account be used only for bilateral trade in goods or services between Iran and the country with primary jurisdiction over the [foreign financial institution], and for sales made under the Humanitarian Exception."<sup>7</sup> Those conditions align with and reiterate stated provisions in U.S. law that exempt humanitarian trade (namely, agricultural commodities, medicine, and medical devices) from U.S. sanctions programs.<sup>8</sup> Treasury further specifies that in order to avoid U.S. sanctions the recipient of any funds from Iranian oil sales has to be an individual or entity of the country where the funds are deposited.<sup>9</sup>

During the period of U.S. participation in the Joint Comprehensive Plan of Action (JCPOA), the Obama Administration waived or lifted most U.S. secondary sanctions on Iran, including on petroleum exports. Iran's use of funds abroad remained problematic due to the reluctance of European banks to engage with Iran and the continued U.S. prohibition on Iran's use of U.S. dollars.<sup>10</sup> Iran also needed to keep funds abroad to support imports of foreign goods. Former CBI Governor Valiollah Seif reportedly said in early 2017, "If the question is whether or not we own the oil revenues, then the answer is definitely yes. But do we need to bring it inside the country? The answer will certainly be in the negative."<sup>11</sup>

In 2018, President Trump announced that the United States would cease participating in the JCPOA and would reinstate "the highest level of economic sanction" on Iran.<sup>12</sup> By November 2018, the United States had "fully re-imposed" pre-JCPOA sanctions on Iran, including on petroleum trade.<sup>13</sup> The Trump Administration issued a final 6-month SRE determination in November 2018 so that eight countries, including South Korea, could continue importing Iranian petroleum without risk of U.S. sanctions; the State Department announced in April 2019 that the United States would not issue further SREs.<sup>14</sup>

The Biden Administration has kept in place all sanctions imposed by the Trump Administration (i.e., sanctions reimposed to cease participating in the JCPOA as well as new sanctions issued subsequent to the U.S. JCPOA withdrawal) and has designated hundreds of additional Iranian and non-Iranian entities for sanctions for involvement in Iran-related activities.

#### **\$6 Billion Transfer of Iranian Funds**

In September 2023, in conjunction with mutual prisoner releases from the United States and Iran, the United States approved the transfer of \$6 billion in Iranian assets, accrued from Iran's petroleum sales to South Korea, to Qatar. The actions by the governments of Iran and the United States occurred in the context of broader diplomatic engagement to de-escalate tensions.<sup>15</sup>

<sup>11</sup> "Iran to ditch US dollar in official reports," Financial Tribune, January 29, 2017.

<sup>&</sup>lt;sup>7</sup> Iran Sanctions FAQs 259 and 260; all Iran sanctions FAQs available at https://ofac.treasury.gov/faqs/topic/1551.

<sup>8</sup> See 22 U.S.C. §7202; IFCA; and FY2012 NDAA.

<sup>&</sup>lt;sup>9</sup> Iran Sanctions FAQ 263.

<sup>&</sup>lt;sup>10</sup> Saeed Kamali Dehghan, "Iran still locked out of global financial system, says central bank chief," Guardian. May 20, 2016.

<sup>&</sup>lt;sup>12</sup> White House, Remarks by President Trump on the Joint Comprehensive Plan of Action, May 8, 2018.

<sup>&</sup>lt;sup>13</sup> Department of Treasury, "Re-imposition of sanctions on Iran that had been lifted or waived under the JCPOA," November 4, 2018.

<sup>&</sup>lt;sup>14</sup> Determination available at Federal Register Vol. 83, No. 247, December 27, 2018; Department of State, "Decision on imports of Iranian oil," April 22, 2019. The November 2018 SRE determination was for China, Greece, India, Italy, Japan, South Korea, Taiwan, and Turkey.

<sup>&</sup>lt;sup>15</sup> See, for example, Karen DeYoung et al., "U.S. and Iran in indirect talks over nuclear program and prisoners," *Washington Post*, June 20, 2023; Chase Winter et al., "What's driving Biden's Iran sanctions policy," Energy Intelligence, September 7, 2023.

Secretary of State Antony Blinken waived secondary sanctions so that financial institutions in Germany, Ireland, Qatar, South Korea, and Switzerland could facilitate the transfer.<sup>16</sup> The transferred funds, now in Qatar, were to be available only for transactions for agricultural commodities, food, medicine, and medical devices with "vetted third-party, non-Iranian vendors," in line with longstanding provisions in U.S. law (including Iran-related authorities) to exempt humanitarian trade from U.S. sanctions, subject to U.S. oversight.<sup>17</sup>

According to a State Department spokesperson, the transfer was necessary because "a number of banks, despite the assurances we had given ... did not want to participate in transactions related to these accounts." Secretary Blinken has reiterated that "the money in question – Iranian money, not American taxpayer dollars – is money that was allowed to accrue in a bank account from the sale of Iranian oil."<sup>18</sup> U.S. officials have not publicly described in detail the oversight mechanisms of the funds. The State Department spokesperson stated that, "We have visibility into how they are used, and we have the ability to police their use." A Treasury FAQ published September 18, 2023, described the establishment of a "humanitarian channel in Qatar (HC)" and said

In partnership with the Government of Qatar and financial institutions operating the HC [humanitarian channel] — all of which have committed to stringent due diligence measures — the United States will closely monitor the HC and will take appropriate action should Iran attempt to use these funds for purposes other than permitted humanitarian purchases.<sup>19</sup>

The State Department spokesperson also said that during the Trump Administration, Iranian funds abroad "were spent down with no restrictions at all" and that "we can find no record of how these funds were spent down."<sup>20</sup> CRS has not reviewed oversight mechanisms reportedly in place for the funds or primary sources providing an accounting of how restricted funds may or may not have been used in the past.

According to available accounts, the funds in Qatar would only be available to fund the purchase of humanitarian goods and reportedly would be transferred from the Qatar-held accounts to non-Iranian third parties. Some observers, including some Members of Congress, have stated that the availability of such goods to Iran could free up other Iranian financial resources for malign activities, including Iran's support for groups like Hamas.<sup>21</sup>

#### Post October 7, 2023, Developments

The October 7, 2023, Hamas attacks on Israel and resulting conflict have prompted an increase in congressional scrutiny of U.S. policy towards Iran, including the transfer of the \$6 billion. U.S. Treasury Under Secretary for Terrorism and Financial Intelligence Brian Nelson wrote on X (formerly Twitter) on October 7, 2023, "All of the money held in restricted accounts in Doha as part of the arrangement to

<sup>&</sup>lt;sup>16</sup> The waivers were exercised pursuant to Section 1245(d)(5) of the FY2012 NDAA (22 U.S.C. §8513(d)(5)) and Sections 1244(i) and 1247(f) of the Iran Freedom and Counter-Proliferation Act of 2012 (IFCA) (22 U.S.C. §§8803(i) & 8806(f)). See https://s.wsj.net/public/resources/documents/IranWaiverLetter.pdf. According to the State Department, these waivers were necessary to persuade European and South Korean banks to participate in the transactions necessary to move the funds into the supervised account in Qatar for what the Treasury Department is calling the humanitarian channel in Qatar. U.S. State Department, Press Briefing, September 12, 2023. Department of the Treasury, Office of Foreign Assets Control, "Frequently Asked Questions, #1134. What is the humanitarian channel in Qatar?" September 18, 2023.

<sup>&</sup>lt;sup>17</sup> White House, "Background press call by senior Administration officials on the return of American detainees from Iran," September 17, 2023.

<sup>&</sup>lt;sup>18</sup> U.S. Department of State, Secretary Antony J. Blinken with Lester Holt of NBC Nightly News, October 12, 2023.

<sup>&</sup>lt;sup>19</sup> Treasury FAQ 1134, https://ofac.treasury.gov/faqs/1134.

<sup>&</sup>lt;sup>20</sup> U.S. State Department, Press Briefing, September 12, 2023.

<sup>&</sup>lt;sup>21</sup> See, for example, House Foreign Affairs Committee, "McCaul statement on release of Americans held hostage in Iran," September 18, 2023.

secure the release of 5 Americans in September remains in Doha. Not a penny has been spent."<sup>22</sup> Asked about the funds in question on October 11, Treasury Secretary Janet Yellen reiterated that the funds "have not been touched" and that "I wouldn't take anything off the table in terms of future possible actions."<sup>23</sup>

An October 12 press report said that Deputy Treasury Secretary Wally Adeyemo told legislators that, in the wake of Hamas's assault on Israel, U.S. and Qatari officials had agreed to prevent the use of the funds to finance the purchase of humanitarian goods for export to Iran for an unspecified period of time.<sup>24</sup> Going forward, the United States could impose sanctions on any foreign financial institution or entity involved in a transaction involving the funds, including restricting access to the U.S. financial system.

The Qatari prime minister said, on October 13, that Qatar is "always committed to any agreement" that Qatar has entered into, a likely reference to the Qatari government's position that it has made commitments to both the United States and Iran in relation to the transfer and potential future use of the funds.<sup>25</sup> If Qatar or the United States act with regard to the funds in ways that the government of Iran perceives as violating the understanding previously reached, Iran could decide to no longer engage Qatar as an intermediary for the United States on issues such as Iran's nuclear program, U.S. nationals unjustly detained in Iran, negotiations with Hamas or other Iran-backed groups, and/or other regional security matters.

#### **Options and Implications for Congress**

As part of its oversight responsibilities, Congress could consider whether or not to seek greater visibility into Iran's funds abroad, including via legislation to require regular reporting by the Administration to Congress on the funds, their location, amount, terms of deposit, and use. Congress could consider whether or not to mandate congressional review of Administration decisions with respect to the funds.

Some Members of Congress are urging or seeking to compel the Administration to act in a demonstrable, transparent way to ensure the funds in Qatar are not used for transactions that could benefit the Iranian government. On October 9, 2023, 20 Senators wrote to President Biden asking him to rescind the waiver that made the transfer possible and "work with" Qatar to "immediately freeze the accounts."<sup>26</sup> Since October 7, Members of Congress have introduced at least 18 pieces of legislation related to Iran (see **Appendix**). Many of those bills would rescind the waivers issued to facilitate the transfer and seek to encourage third parties to block or otherwise decline to conduct transactions with the funds. Others would seek to confiscate and repurpose the funds, though the United States' ability to seize the funds may be limited as the United States does not have jurisdiction over them.

New official action to prevent use of the funds could provoke a response from the Iranian government, which has criticized the reported temporary blocking of the funds. Such action also could have implications for other U.S. interests, including with respect to Qatar, a major non-NATO ally of the United States that hosts major U.S. military facilities.<sup>27</sup> It is unclear what effect rescission of the waivers with respect to past inter-bank transactions might have. Rescinding certain waivers or amending the

<sup>&</sup>lt;sup>22</sup> X, Under Secretary Brian Nelson (@UnderSecTFI), October 7, 2023, https://twitter.com/UnderSecTFI/status/ 1710706779980464482?s=20.

<sup>&</sup>lt;sup>23</sup> C-SPAN, "Treasury Secretary holds news conference on priorities for IMF and World Bank," October 11, 2023.

<sup>&</sup>lt;sup>24</sup> Jeff Stein and Jacob Bogage, "U.S., Qatar agree to stop Iran from tapping \$6 billion fund after Hamas attack," *Washington Post*, October 12, 2023.

<sup>&</sup>lt;sup>25</sup> U.S. Department of State, "Secretary Antony J. Blinken with Qatari Prime Minister and Minister of Foreign Affairs Mohammad bin Abdulrahman Al Thani at a joint press availability," October 13, 2023.

<sup>&</sup>lt;sup>26</sup> Text of the letter at https://www.blackburn.senate.gov/services/files/B5653D28-BA82-4F3B-AC72-BF4443955935.

<sup>&</sup>lt;sup>27</sup> Michael Crowley and Alan Rappeport, "U.S. and Qatar deny Iran access to \$6 billion from prisoner deal," *New York Times*, October 12, 2023.

authorities underlying them could have implications for Iraq, which has relied on U.S. sanctions waivers to import electricity from Iran (see below).

Congress could also revisit longstanding sanctions exceptions for humanitarian trade, weighing them against the broader goal of pressuring the Iranian government and the interest some Members may have in supporting the Iranian people.

#### Iraqi Imports of Iranian Electricity and Natural Gas

Successive presidential Administrations have waived the potential imposition of U.S. sanctions on Iranrelated transactions in instances related to Iraq. Since the reimposition of U.S. sanctions in 2018, the Iraqi government has sought, and received, waivers from the United States to avert the potential imposition of U.S. sanctions related to Iraqi transactions with the Central Bank of Iran for the purpose of importing electricity from Iran.<sup>28</sup> As with the oil-related accounts above, Iraq pays for electricity imports by depositing payment into Central Bank of Iran accounts in Iraq. As with restricted Iranian funds in other countries, these electricity sale proceeds are held in Iraq and potentially available to fund bilateral humanitarian trade.<sup>29</sup> The Trump Administration granted such waivers to "meet the immediate energy needs of the Iraqi people," per a State Department spokesperson, while pressing Iraq to develop a "diverse energy base," as Secretary of State Mike Pompeo said in May 2019.<sup>30</sup> The Biden Administration has continued this practice and stated similar objectives for Iraq's energy sector.<sup>31</sup>

On July 18, 2023, Secretary Blinken reportedly signed another waiver (the 20<sup>th</sup> such waiver, per a State Department spokesperson) so that Iraq could pay for electricity purchased from Iran without threat of U.S. sanctions.<sup>32</sup> The Administration expanded this waiver to allow Iraq to deposit payments during the period of the waiver in third-country financial institutions (previous waivers permitted payment only to restricted accounts in Iraq).<sup>33</sup> An unnamed U.S. official said the United States expanded the waiver to "help the Iraqis with this perennial pressure from the Iranians," arguing that it "helps the Iraqis, at least somewhat, to have an argument to make [to Iran] that they are not in control of the money" that will now go to third countries.<sup>34</sup> A State Department spokesperson confirmed reports on July 24 that "Oman has indicated a willingness to receive a portion" of the funds, which "can only be used for non-sanctionable activities such as humanitarian assistance," and that "the transactions need to be approved by the United States Treasury Department in advance."<sup>35</sup>

Iraq also imports Iranian natural gas, though such transactions do not require a waiver, as transactions with Iran involving natural gas are excepted from U.S. sanctions, under the condition that natural gas-

<sup>34</sup> Ibid.

<sup>&</sup>lt;sup>28</sup> John Davison and Ahmed Rasheed, "Iraq seeks exemption from U.S. sanctions on Iran, PM says," Reuters, December 11, 2018.

<sup>&</sup>lt;sup>29</sup> "The former Kadhimi administration 'received several [US] approvals [for debt payments to Iran] but they were for buying food and medicine and paying Iran's debt to Turkmenistan,' an informed Arab source explained, elaborating that transfers were also made to 'Iran's bank accounts in other countries so Iran could use the funds for humanitarian purposes.'" "Inside story" Iraqi debt payment to Iran highlights Iran-Saudi-US dynamics," *Amwaj.media*, June 12, 2023.

<sup>&</sup>lt;sup>30</sup> U.S. Department of State, "IRGC-QF sanctions and Iraq's electricity waiver," March 26, 2020; "Remarks to traveling press," May 7, 2019.

<sup>&</sup>lt;sup>31</sup> U.S. Department of State, Iraq - Integrated Country Strategy, May 30, 2023.

<sup>&</sup>lt;sup>32</sup> U.S. Department of State, Press Briefing, July 19, 2023; Arshad Mohammed, "Exclusive: US issues new 120-day waiver letting Iraq pay Iran for electricity," Reuters, July 18, 2023.

<sup>33</sup> Ibid.

<sup>&</sup>lt;sup>35</sup> U.S. Department of State, Press Briefing, July 25, 2023.

related transactions are for bilateral, non-sanctioned trade and that the funds owed to Iran for natural gas similarly are kept in the country that imports the natural gas.<sup>36</sup>

Iraq's Prime Minister estimated in August 2023 that Iraq held approximately \$10 billion in Iranian restricted funds, which he characterized as a debt to Iran.<sup>37</sup> This figure presumably reflects restricted funds that have accrued in Iraq as a result of purchases of electricity and natural gas from Iran in compliance with U.S. sanctions. In June 2023, the Biden Administration reportedly approved Iraq's payment of \$2.7 billion from Iran's restricted funds in Iraq to third countries to which Iranian entities owed money, including to Saudi Arabia and Turkmenistan.<sup>38</sup> A State Department spokesperson confirmed the transaction, saying

Going back a number of years, these funds have been transferred out of the restricted accounts to pay only for humanitarian and other non-sanctionable transactions. So the United States, we continue to approve these – the transactions for the use of these funds on a case-by-case basis. They can only be used for humanitarian purposes such as food, medicine, and other humanitarian needs.<sup>39</sup>

<sup>36 22</sup> U.S.C. §8803.

<sup>&</sup>lt;sup>37</sup> "Settling \$10bn Iran gas debt: Iraq's creative solution amid US sanctions," Al Arabiya News, August 2, 2023.

<sup>&</sup>lt;sup>38</sup> "Iraq to pay \$2.76 billion in gas and electricity debt to Iran," Reuters, June 10, 2023. The payments reportedly included 866 million euros to Turkmenistan to partially settle Iranian debt and 120 million euros to Saudi Arabia to "defray costs" for Iranian hajj pilgrims. Laurence Norman and David Cloud, "U.S. launches quiet diplomatic push with Iran to cool tensions," *Wall Street Journal*, June 14, 2023.

<sup>&</sup>lt;sup>39</sup> U.S. Department of State, Press Briefing, June 14, 2023.

### Appendix. Selected Iran-Related Legislation Introduced Since October 7, 2023

### H.Res.776 — Urging the Biden administration to rescind the release of \$6,000,000,000 in frozen Iranian funds and to lawfully enforce the Taylor Force Act.

Would urge the Biden Administration to immediately block the \$6,000,000 and urge that the Administration carry out the Taylor Force Act "in full."

# H.R.5921 —To prohibit the Secretary of the Treasury from authorizing certain transactions by a United States financial institution in connection with Iran, to prevent the International Monetary Fund from providing financial assistance to Iran, to codify prohibitions on Export-Import Bank financing for the Government of Iran, and for other purposes.

Would prohibit the Secretary of the Treasury from authorizing U.S. financial institutions to conduct transactions related to the import to or export from Iran of any goods except agricultural commodities, food, medicine, or medical devices; would direct the Secretary of the Treasury to instruct the U.S. Executive Director at the IMF to oppose financial assistance to Iran; and would prohibit the Export-Import Bank from extending credit to the government of Iran.

## H.R.5923 —To impose restrictions on correspondent and payable-through accounts in the United States with respect to Chinese financial institutions that conduct transactions involving the purchase of petroleum or petroleum products from Iran.

Would amend Section 1245 of the FY2012 NDAA to clarify that significant transactions include transactions by Chinese financial institutions involving the purchase of petroleum from Iran

### H.R.5932 — To authorize additional assistance to Israel using assets confiscated from the Iran, and for other purposes.

Would prohibit Iranian funds blocked by the Treasury from being released before a Presidential certification that Iran is participating in "a bona fide international mechanism" to compensate Israel for "harms resulting from the invasion of Israel by Hamas;" would subject Treasury's unblocking of Iranian assets to congressional approval; and would authorize the President to confiscate any U.S.-based Iranian assets and deposit them in an account to provide assistance to Israel.

#### H.R.5945 — To reinstate certain sanctions imposed with respect to Iran.

Would reinstate any sanctions imposed pursuant to Sections 1244 and 1247 of IFCA and to Section 1245 of the FY2012 NDAA and waived "pursuant to an agreement" between the United States and Iran.

### H.R.5947 — To provide for the rescission of certain waivers and licenses relating to Iran, and for other purposes.

Text not available on Congress.gov as of October 25, 2023.

#### S.3041 — A bill to reinstate certain sanctions imposed with respect to Iran.

Would reinstate any sanctions imposed pursuant to Sections 1244 and 1247 of IFCA and to Section 1245 of the FY2012 NDAA and waived "pursuant to an agreement" between the United States and Iran.

### H.R.5961 — To freeze certain Iranian funds involved in the 2023 hostage deal between the United States and Iran, and for other purposes.

Would direct the President to impose sanctions on foreign financial institutions determined to be engaged in transactions involving the \$6 billion in Iranian funds transferred from South Korea to Qatar.

#### S.3049 — Revoke Iranian Funding Act of 2023

Would rescind the September 11, 2023, waiver and direct the Secretary of the Treasury to rescind all licenses, letters, and guidance related to the \$6 billion transfer; would direct the submission of a report on Iran's assets blocked by the United States.

#### S.3053 — Preempting Misguided Appeasement and Financing of Destabilizing Regimes Act of 2023

Would prohibit the importation of petroleum and petroleum products (including natural gas) from Venezuela and Iran

### S.3061 — A bill to revoke the waiver determination submitted to Congress on September 11, 2023, with respect to certain sanctions imposed with respect to Iran.

Would revoke the September 11, 2023, waiver determination.

#### S.3064 — U.N. Anti-Terrorism Accountability Act of 2023.

Would direct the U.S. Permanent Representative to the United Nations to press for Iran's expulsion from the U.N. General Assembly and prohibit U.S. contributions to the U.N. Relief and Works Agency for Palestine Refugees in the Near East until Iran is expelled from the U.N. General Assembly.

### S.3081 — A bill to authorize additional assistance to Israel using assets confiscated from Iran, and for other purposes.

Would prohibit Iranian funds blocked by the Treasury from being released before a Presidential certification that Iran is participating in "a bona fide international mechanism" to compensate Israel for "harms resulting from the invasion of Israel by Hamas;" would subject Treasury's unblocking of Iranian assets to congressional approval; and would authorize the President to confiscate any U.S.-based Iranian assets and deposit them in an account to provide assistance to Israel.

#### H.R.5994 — To provide for full enforcement of oil sanctions against Iran, and for other purposes.

Would direct the President to "make maximal use" of existing sanctions authorities with respect to transactions involving Iranian petroleum; would prohibit the use of waiver authority under Section 1244 of IFCA with respect to accounts holding the proceeds of Iranian exports until certifying that Iran has ceased its support for terrorism, nuclear activities, and support for Russia's war against Ukraine; would cancel September 11, 2023, sanctions waivers and direct the President to impose sanctions on financial institutions that conduct transactions with the \$6 billion; would terminate waivers issued with respect to funds owed to Iran by Iraq and would direct the President to impose sanctions on financial institutions that conduct transactions with those funds.

#### H.R.6000 — To freeze \$6,000,000,000 of Iranian funds held in Qatar, and for other purposes.

Would rescind the September 11, 2023, waiver and direct the Secretary of the Treasury to rescind all licenses, letters, and guidance related to the \$6 billion transfer; would direct the submission of a report on Iran's assets blocked by the United States.

### H.R.6010 — To invalidate the use of United States passports to travel to Iran, and for other purposes.

Text not available on Congress.gov as of October 25, 2023.

### H.R.6015 — To require the President to prevent the abuse of financial sanctions exemptions by Iran, and for other purposes.

Would direct the President to issue regulations to ensure that excepted humanitarian transactions do not facilitate the purchase of goods involving sanctioned persons or support terrorism or the proliferation of weapons of mass destruction.

### H.R.6017 — To revoke the waiver determination submitted to Congress on September 11, 2023, with respect to certain sanctions imposed with respect to Iran.

Text not available on Congress.gov as of October 25, 2023.