An Open Letter to Members of the Financial Action Task Force (FATF):

STAND UP AGAINST IRANIAN FINANCING OF TERRORISM & MONEY LAUNDERING

February 19, 2018

Dear FATF Members:

As you gather in Paris on February 18–23, we urge the FATF to re-impose effective countermeasures to stymie Iran's financing of terrorism and money laundering.

While the Rouhani administration has made nominal efforts to bring Iran into compliance with international banking standards, Tehran's actions speak louder than its words. The Islamic Revolutionary Guard Corps (IRGC), a sanctioned terrorist organization which has enabled the Assad regime's barrel bombing of thousands of innocent civilians, is slated to receive increased funding of \$8 billion under the Iranian regime's proposed budget for the next fiscal year.

That's alongside an influx of funds in the draft financial plan for FY 2018-19 to religious foundations, which have been sources of financing for Iran's terror proxy, Hezbollah. Hezbollah also receives funds directly from Iranian Supreme Leader Ayatollah Ali Khamenei's personal budget which is not subject to independent oversight.

Hezbollah is not the only terror group that benefits from Tehran's generosity. Reports indicate the head of Iran's Qods Force—the IRGC's foreign operations unit—placed calls to the leaders of the military wings of Hamas and Islamic Jihad, which are themselves internationally sanctioned terrorist organizations, pledging renewed military assistance after President Trump's announcement on the status of Jerusalem in December 2017.

In addition to terrorist financing, money laundering is rampant in Iran. The preeminent Basel Institute on Governance ranks Iran last out of 146 countries in its 2017 Basel Anti-Money Laundering (AML) index, meaning money laundering and terrorist financing is most rampant there.

Weakening the standards for Iran—particularly Tehran's attempt to carve out an exemption for Hezbollah as a "liberation organization" sends a message that the FATF is eroding the standards for anti-money laundering and combating the financing of terrorism more generally.

Thank you for your consideration and for your continued good work to protect the international financial system.

Sincerely,

Senator Joseph I. Lieberman Former U.S. Senator (I-CT) Chairman of United Against Nuclear Iran

Ambassador Mark D. Wallace Former U.S. Ambassador to the United Nations for Management and Reform CEO of United Against Nuclear Iran

Frances Townsend Former U.S. Homeland Security Advisor

Michael Morell Former Acting Director and Deputy Director of the U.S. Central Intelligence Agency

David S. Cohen Former Deputy Director of the U.S. Central Intelligence Agency and Under Secretary of the Treasury for Terrorism and Financial Intelligence

Governor Bill Richardson Former Governor of New Mexico and U.S. Secretary of Energy

Governor Jeb Bush Former Governor of Florida

Ambassador John Bolton Former U.S. Ambassador to the United Nations

Senator Norm Coleman Former U.S. Senator (R-MN)

Senator Mark S. Kirk Former U.S. Senator (R-IL) Ambassador Giulio Terzi Former Foreign Minister of Italy

Ambassador Radosław Sikorski Former Foreign Minister of Poland

Dr. August Hanning Former Director of the Federal Intelligence Service of Germany (BND)

Lt. Gen. (ret.) Sir Graeme Lamb Former Director of the UK Special Forces Former Commander of the British Field Army

Ambassador Dennis B. Ross Former Special Assistant to the President and Senior Director for the Central Asia Region, U.S. National Security Council

Elliott Abrams Former U.S. Deputy National Security Advisor for Global Democracy Strategy

Norman T. Roule Former U.S. National Intelligence Manager for Iran

Ambassador Cresencio Arcos Former Assistant Secretary and Director of International Affairs U.S. Department of Homeland Security

Lt. Gen. (ret.) Michael D. Barbero Former Director of the U.S. Joint Improvised Explosive Device Defeat Organization

Barry Rosen Survivor of the 1979 Iran Hostage Crisis Ambassador Mark P. Lagon

Former U.S. Ambassador-At-Large and Director of the Office to Monitor and Combat Trafficking in Persons at the U.S. Department of State

Ambassador Joseph M. Torsella State Treasurer for the Commonwealth of Pennsylvania Former U.S. Ambassador to the United Nations for Management and Reform

Ray Takeyh

Hasib J. Sabbagh Senior Fellow at the Council on Foreign Relations Former Senior Advisor on Iran at the U.S. Department of State

Dr. Michael Makovsky President and CEO of the The Jewish Institute for the National Security of America



FOR A COMPLETE COPY OF THE LETTER SENT TO MR. SANTIAGO OTAMENDI, THE PRESIDENT OF FATF, PLEASE VISIT WWW.UANI.COM.

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