

Congress of the United States
Washington, DC 20515

April 15, 2024

The Honorable Joseph R. Biden
President of the United States
The White House
1600 Pennsylvania Avenue, N.W.
Washington, D.C., 20500

Dear President Biden,

As members of the Republican Study Committee, we write to express our deep concern both with your decision to host Iraqi Prime Minister Mohammed Shia Al-Sudani to the White House and with your overall Iraqi policy. Despite hundreds of billions of dollars spent in Iraq over two decades and countless lost American treasure, Iraq is now solidly in Iran's hands.¹ This is evident across Iraq's institutions and within Prime Minister Sudani's own government, which includes two US-designated terrorist groups, As'aib ahl al-Haq and Kata'ib Hezbollah, the latter of which was responsible for killing Americans as recently as this January. On Saturday Iranian-backed militias in Iraq joined Iran in directly attacking Israel.² Iraqi PM Sudani leads an Iraqi government which funds Iran-backed militias to the tune of at least \$2.7B annually, including at least three US-designated terrorist groups, which have attacked Americans over 180 times since October 7th, killing three Americans and injuring over 100.³

The Iraqi federal budget last year also passed massive funding for the Iranian-backed militias' financial arm, the Muhandis General Company⁴, which gives the IRGC and Iraqi militias almost unlimited access to terrorist threat funding and land grants – the last one of which was half the size of Lebanon, in the exact area from which the same militias launched drones at Saudi Arabia.⁵

¹ Kristina Hummel, "Iraq's New Regime Change: How Tehran-Backed Terrorist Organizations and Militias Captured the Iraqi State," Combating Terrorism Center at West Point, February 3, 2024, Knights, Crispin Smith, Michael. "Remaking Iraq: How Iranian-Backed Militias Captured the Country." *Just Security*, 20 Mar. 2023, <https://www.justsecurity.org/85566/remaking-iraq-how-iranian-backed-militias-captured-the-country/>.

² Iran hails proxies for joining attack on Israel; IDF strikes Hezbollah in response. April 14, 2024. <https://www.timesofisrael.com/iran-hails-proxies-for-joining-attack-on-israel-idf-strikes-hezbollah-in-response/#:~:text=Iran's%20proxies%20in%20the%20region,of%20drone%20and%20missile%20swarms.>

³ Tracking Anti-U.S. Strikes in Iraq and Syria during the Gaza Crisis. The Washington Institute. <https://www.washingtoninstitute.org/policy-analysis/tracking-anti-us-strikes-iraq-and-syria-during-gaza-crisis>.

⁴ Profile: Muhandis General Company. The Washington Institute. <https://www.washingtoninstitute.org/policy-analysis/profile-muhandis-general-company>

⁵Ibid., and Iran International. "Iraq's Shiite Militias Modelling IRGC's Engineering Arm," April 15, 2024. <https://www.iranintl.com/en/202305261900.;>

The IRGC's influence is also now extending to Iraq's judiciary which has spearheaded the campaign against American interests, most notably in the Kurdistan Region.⁶ Iraq's parliament includes members of US-designated terrorist groups, including in its own Finance Committee which authorizes the funding of US-designated terrorist groups, and blocks the funding for the Kurdistan Regional Government, the US' best partner in Iraq, as well as others in Iraq who oppose the IRGC.

Sudani's own cabinet facilitates the support of terrorism, including the actions of the Governor of the Central Bank, the Minister of Finance and the Minister of Oil. Iraq's own security forces, which the U.S. reconstituted, have now been almost entirely infiltrated at leadership level by IRGC-backed militias, such that its ranks now include U.S.-designated terrorists and its training programs now incorporate members of these same groups.⁷

Inexplicably the U.S. Treasury Department continues to facilitate the transfer of US banknotes to Iraq's Central Bank which are then used by Iraq's Finance Minister to fund these US-designated terrorist groups and IRGC proxy militias.⁸ The Minister of Oil oversees the second largest OPEC producer, but for an industry that is now largely also controlled by these militias who control much of Iraq's internal distribution and which facilitate oil sanctions evasion with Iran by exporting Iranian oil as unsanctioned Iraqi oil.⁹

These are the officials you have determined are worthy to visit the White House. Furthermore, China and Russia have exploited U.S. investments in Iraq, such that China now operates more

⁶"Making Sense of Iraq's Politicized Supreme Court Rulings | The Washington Institute." Accessed April 15, 2024. <https://www.washingtoninstitute.org/policy-analysis/making-sense-iraqs-politicized-supreme-court-rulings>. And "The Popular Mobilization Force Is Turning Iraq into an Iranian Client State." The Brookings Institution. Accessed April 15, 2024. <https://www.brookings.edu/articles/the-popular-mobilization-force-is-turning-iraq-into-an-iranian-client-state/>

⁷"Extraordinary Popular Mobilization Force Expansion, by the Numbers | The Washington Institute." Accessed April 15, 2024. <https://www.washingtoninstitute.org/policy-analysis/extraordinary-popular-mobilization-force-expansion-numbers>; "Mainstreaming Hashd Commanders (Part 1): Advanced Education for Senior Militiamen | The Washington Institute." Accessed April 15, 2024. <https://www.washingtoninstitute.org/policy-analysis/mainstreaming-hashd-commanders-part-1-advanced-education-senior-militiamen>. "Mainstreaming Hashd Commanders (Part 2): Fifty-Fold Increase in Officer Training | The Washington Institute." Accessed April 15, 2024. <https://www.washingtoninstitute.org/policy-analysis/mainstreaming-hashd-commanders-part-2-fifty-fold-increase-officer-training>.

⁸Exclusive: U.S. Treasury Official says Iraq must act to avoid further action on banks. U.S. News. <https://www.usnews.com/news/world/articles/2023-09-14/exclusive-u-s-treasury-official-says-iraq-must-act-to-avoid-further-action-on-banks>; U.S. Sanctions 14 Iraqi Banks in Crackdown on Iran Dollar Trade. Wall Street Journal. <https://www.wsj.com/articles/u-s-sanctions-14-iraqi-banks-in-crackdown-on-iran-dollar-trade-33ef9f35>

⁹ Iraq And Iran Will Expedite Development Of Sanctions-Busting Shared Oil Fields. Oilprice.com [https://oilprice.com/Energy/Crude-Oil/Iraq-And-Iran-Will-Expedite-Development-Of-Sanctions-Busting-Shared-Oil-Fields.html#:~:text=Iraq%20And%20Iran%20Will%20Expedite%20Development%20Of%20Sanctions%20Busting%20Shared%20Oil%20Fields.,-By%20Simon%20Watkins&text=There%20are%20many%20shared%20fields,is%20massive%20for%20both%20countries.](https://oilprice.com/Energy/Crude-Oil/Iraq-And-Iran-Will-Expedite-Development-Of-Sanctions-Busting-Shared-Oil-Fields.html#:~:text=Iraq%20And%20Iran%20Will%20Expedite%20Development%20Of%20Sanctions%20Busting%20Shared%20Oil%20Fields.,-By%20Simon%20Watkins&text=There%20are%20many%20shared%20fields,is%20massive%20for%20both%20countries.;); Iraq Activates new Deal to Pay Iran for Gas. Iraq Oil Report. <https://www.iraqoilreport.com/news/iraq-activates-new-deal-to-pay-iran-for-gas-46386/>

than 50% of Iraq's oil fields and the Iraqi Oil Ministry now turns to Russian and China for the bulk of its sales and investments.¹⁰ In essence, the US has effectively overseen China, Russia and Iran dominate Iraq, despite our overwhelming financial and human commitment to Iraq's latest chapter.¹¹

To make matters worse, Iraq, with strong support from Iran, has again turned on the Kurds¹² where the Iraqi government continues to refuse to allocate the Kurdistan Region its full Constitutional budget, blocks congressionally appropriated equipment for the Peshmerga, and now blocking Kurdistan oil exports and US investments. Prior to his official visit scheduled for April 15th, we request answers to the following questions:

- Can the Secretary of Treasury certify that no US dollar transfers to Iraq's Central Bank are being used to directly or indirectly fund the Iranian Regime or its proxies in Iraq? What measures has Treasury taken to prevent Iraq's Finance Minister from funding US-designated terrorist groups, including Kata'ib Hezbollah, Asa'ib Ahl Al Haq (AAH), Harakat Al Nujaba (HAN), and Kata'ib Sayyid al-Shuhada (KSS)?
- Why does the Treasury Department continue to support US-dollar transfers to the Iraqi government when these funds are transferred to US-designated terrorist groups?
- Has the Department of State determined that any members of Iraq's government and members of the visiting delegation, including its Central Bank Governor, Ali Mohsen al-Alaq, Minister of Finance, Taif Sami Mohammed, or Minister of Oil, Hayyan Abdul Ghani meet and their immediate family members to be deemed ineligible for entry into the United States pursuant to Sec. 7031(c) of the Department of State, Foreign Operations, and Related Programs Appropriations Act, 2019 (SFOPs; P.L. 116-6; 8 U.S.C. 1182 note) which makes foreign officials and their immediate family members ineligible for U.S. entry if there is credible evidence that such individuals "have been involved in significant corruption, including corruption related to the extraction of natural resources, or a gross violation of human rights?" We further request that a determination is made on whether these officials should be so designated.
- What considerations have been made on how Iraqi oil revenues processed through the Federal Reserve can be escrowed as a result of Iraq's support for terrorist operations and the lack of funding for the Kurdistan Region, including the blocking of oil exports?
- What measures have the State or Treasury Department taken to prevent Iraq's oil sector facilitating Iranian sanctions evasion directly and through Iraq's own Iran-backed US-designated terrorist groups, including Asa'ib Ahl Al Haq (AAH)? What components of Iraq's Oil Ministry and State Oil Marketing Organization (SOMO) are subject to sanctions


¹⁰ China Awarded Major Contract by Iraq for Supergiant Oil and Gas Field. OilPrice.com <https://oilprice.com/Energy/Energy-General/China-Awarded-Major-Contract-By-Iraq-For-Supergiant-Oil-And-Gas-Field.html>;

¹¹ Russia and China tighten grip on Iraqi oil crescent. OilPrice.com <https://oilprice.com/Energy/Energy-General/Russia-And-China-Tighten-Grip-On-Iraqi-Oil-Crescent.html>

¹² The Demise of Iraqi Federalism. The Wilson Center. <https://www.wilsoncenter.org/article/iraq-demise-federalism>

based on their affiliations with and business operations by Iran, IRGC affiliates or proxies, including Asa'ib Ahl al Haq (AAH) and Kata'ib Hezbollah?

- How is the Defense and State Department addressing the Iraqi government's blockade on Congressionally appropriated military equipment for the Kurdistan Region?
- Under what criteria is the State Department granting Iraq sanctions waivers for paying Iran for imported gas and electricity and what metrics are being used to track its reduction in this dependency?
- Will the Department of State or Treasury make a determination regarding whether former PM Nouri Al-Maliki and the Muhandis General Company have provided support for or engaged in significant transactions with the IRGC and thus meet the criteria for sanctions?
- Has the Department of State or Treasury made a determination on whether the following members of Iraqi Parliament who are members and representatives of US-designated terrorist organizations meet the criteria for designation as Specially Designated Global Terrorist pursuant to EO 13224: Saad Awad Nasir Al Tawbi, Odai Awad Kadhim Mahmoud Al Husaini, Mustafa Jabbar Sinad Zabain Al Miryani, Mustafa Khalil Nsayif Jasim Al Garaawie, Husain Munis Faraj, Yousif Al Kilabi, and Mohammad Noori Aziz Kadhim Al Khuzaie?



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