



August 16, 2022

President Joseph R. Biden
The White House
1600 Pennsylvania Avenue, N.W.
Washington, D.C. 20500

Re: Request to deny visas to Islamic Republic of Iran President
Ayatollah Seyyed Ebrahim Raisi and his delegation to attend
UNGA in September 2022

Dear President Biden:

We are organizations of Jewish-Americans; Iranian Americans who escaped from the brutal Iranian regime; human rights activists; and New Yorkers and others across America who are at risk from the Islamic Republic of Iran's threats to annihilate us. We are deeply concerned that on July 31, 2022, a video on Iranian state media threatened to activate a nuclear weapons program and use nuclear-capable intercontinental ballistic missiles (ICBMs) "*to turn New York into ruins and hell*" and to "*turn the West and Israel's nightmare into a reality.*"¹ Iran has also been pursuing assassination plots against U.S. residents and officials in New York and elsewhere in the U.S.

Remarkably, just two days after threatening to turn New York into "*ruins and hell,*" the Islamic Republic of Iran announced that its president, Ayatollah Seyyed Ebrahim Raisi, who is subject to U.S. sanctions due to his involvement in the mass murder of thousands of Iranians, intends to attend the September 2022 United Nations General Assembly meetings in New York City.²

In order to protect U.S. national security, we strongly, respectfully urge you to deny visas for Ayatollah Raisi and his delegation to enter the United States to attend the UNGA.

Admitting Raisi and His Delegation Endangers National Security:

We share the concerns sent to you by seven prominent U.S. Senators, who urged you to deny visas to Ayatollah Raisi and his delegation, because "*Raisi's involvement in mass murder and the Iranian regime's campaign to assassinate U.S. officials on American soil make allowing Raisi and his henchmen to enter our country an **inexcusable threat to national security.***"³

The U.S. Senators' letter cited recent reports (including a U.S. National Counterterrorism Center report last month) that the Islamic Revolutionary Guard Corps (IRGC, a U.S.-designated [Foreign Terrorist Organization](#)) and IRGC's Quds Force (special operations unit), **plan to assassinate**

current and former high-profile U.S. officials, including former U.S. National Security Adviser John Bolton; former Secretary of State Mike Pompeo, former CENTCOM Commander Kenneth McKenzie, and others, on U.S. soil.⁴

The Senators thus aptly warned: *“Allowing Raisi to travel to the United States—while his agents actively work to assassinate senior American officials on U.S. soil—would gravely endanger our national security, given the likely presence of IRGC agents in the Iranian delegation.”*⁵

Just a few days ago, the U.S. Department of Justice (DOJ) National Security Division announced that it charged an IRGC member with attempting to arrange the murder of former Ambassador John Bolton. The announcement also revealed that the IRGC member was attempting to murder another unnamed target on U.S. soil; and that *“someone working on behalf of the IRGC-QF had already conducted pre-operational surveillance on the second target in the United States.”* In the announcement, the Executive Assistant Director of the FBI’s National Security Branch stated that *“Iran has a history of plotting to assassinate individuals in the U.S. it deems a threat.”*⁶

Iran moreover openly **refused** to give up its state policy of assassinating U.S. officials, even in return for U.S. offers to provide concessions or lift sanctions. In April 2022, IRGC Navy Commander Alireza Tangsiri stated: *“The enemy [the U.S.] keeps sending messages that if we give up on avenging Soleimani, they will give us some concessions or lift some sanctions. This is pure fantasy. The Supreme Leader [Khamenei] has emphasized the need for revenge and the Revolutionary Guards’ top commander has said that revenge is inevitable and that we will choose the time and place for it.”*⁷ Further, in January, Iran placed 52 U.S. officials on a sanctions blacklist believed to double as an assassination target list.⁸

Iranian operatives also pose grave risks to other U.S. citizens and guests on U.S. soil. In March 2022, U.S. Assistant Attorney General Matthew Olsen stated: *“We’ve pursued those who participated in Iranian plots targeting dissidents living here [in the U.S.]”*⁹ In 2011, the DOJ indicted an IRGC Quds force operative and another individual directed by Iran, for plotting to assassinate Saudi Arabia’s ambassador to the United States with explosives at a Georgetown, Washington DC restaurant. Numerous innocent U.S. residents could have been killed or injured in the planned explosion.¹⁰ On August 12, 2022, in western New York, an IRGC sympathizer severely stabbed acclaimed British novelist Salman Rushdie; an Iranian fatwa had called for Rushdie’s death and Iran-subsidized entities had offered a \$4 million bounty to kill Rushdie.¹¹

Moreover, Iranian diplomats have repeatedly abused their diplomatic status to mastermind or further terror plots. In 2020, the U.S. State Department reported: *“Multiple countries have issued arrest warrants for Iranian **diplomats** for the killings of dissidents and others perceived as threats to the Iranian regime and its ideology.”*¹² For instance, in 2018, Iranian envoy to Austria Assadollah Assadi tried to use his diplomatic cover to orchestrate a bombing plot in France. At the last minute, Belgian officers foiled the plot and arrested a Belgian-Iranian couple carrying explosives. Then, after Assadi was arrested, convicted and sentenced, Iran imprisoned an innocent Belgian aid worker, as a bargaining chip to trade for Assadi.¹³

The risk of furthering Iranian assassination plots against U.S. leaders, citizens and guests is unacceptable, and warrants denying visas to Raisi and his delegation. In addition, granting visas to Ayatollah Raisi and his entourage would endanger national security by undermining your administration's stated commitment to prioritize human rights, and would send a message that a mass murderer may be tolerated.

Ebrahim Raisi is Subject to U.S. Sanctions:

In November 2019, the U.S. Department of the Treasury's Office of Foreign Assets Control (OFAC) designated Raisi, then head of Iran's Judiciary, for: overseeing executions and death row sentences for child offenders in 2018-2019, in violation of international law; arresting and meting out lengthy sentences to attorneys for defending human rights activists; involvement in Iran's brutal crackdown against Green Movement protesters; and actively participating in Iran's 1988 "death commissions" that ordered the torture and brutal mass extrajudicial executions of thousands of political prisoners in 1988.¹⁴

Raisi was one of the four members of the notorious Teheran Death Committee. The UN and numerous human rights organizations called for investigating and holding Raisi accountable for his role in the 1988 massacres ordered by the Death Committees. Moreover, Raisi praised these heinous mass executions of political prisoners and secular and leftwing Iranians, after Raisi was elected as Iran's president in June 2021.¹⁵ The National Council of Resistance of Iran estimates that the death committees massacred 30,000 political prisoners.¹⁶ The massacres wiped out thousands of individuals who could have helped transform Iran from the largest state sponsor of terrorism into a country that lives in peace with its neighbors and the U.S.

The OFAC designation of Raisi was issued pursuant to Executive Order 13876, which suspended the entry of such persons into the United States **because their entry "would be detrimental to the interests of the United States."**¹⁷

The U.S. Power to Deny Visas to Raisi and his Delegation:

The 1947 United Nations Headquarters agreement's general requirement that the U.S. needs to provide visas to foreign diplomats is limited by the U.S. authorizing law's "security reservation," additional U.S. law and long precedent.

The U.S. security reservation: The U.S. agreed to the 1947 UN Headquarters agreement "*subject to the provisions of [U.S.] Public Law [80-]357.*"¹⁸ Public Law 80-357 was the joint Senate resolution that authorized the United States to enter into the UN Headquarters agreement. This authorizing resolution provides that "*Nothing in the [UN Headquarters] agreement shall be construed as in any way diminishing, abridging, or weakening the right of the United States to safeguard its own security and completely to control the entrance of aliens into any territory of the United States other than the headquarters district and its immediate vicinity.*"¹⁹

This security reservation plausibly reserves both a general, absolute right for the U.S. to “safeguard its own security,” as well as a more specific right to limit travel outside the U.N. district.²⁰ Both Democratic and Republican administrations have taken this position, and invoked this security reservation to deny visas to representatives seeking to attend UN meetings.

U.S. Law: In 2014, President Barack Obama signed a law, unanimously passed by Congress, that bars entry to any UN representative who has engaged in terrorist activity against the U.S. or its allies, and poses a threat to U.S. national security interests.²¹

Precedent: The U.S. Senators’ letter to you recounts that “*there is strong precedent for denying an entry visa to foreign leaders*” to attend UN meetings and cites several examples: In 2014, the Obama-Biden administration denied an entry visa to Iranian UN Ambassador Hamid Aboutalebi, who was involved in taking Americans hostage in 1979. The U.S. also denied entry to PLO Chair Yasser Arafat in 1988, and to Iranian Foreign Minister Javad Zarif in 2020.²²

The former U.S. Representative to the Committee on Relations with the Host Country, Patricia M. Byrne, cited additional precedents supporting the principle that “*The United States . . . has the right to protect its national security. No government can be expected to jeopardize its national security. United Nations practice confirms that the host country is not expected to accept the entry of every individual to the Headquarters District, but must retain the right to exclude the entry of individuals in certain limited cases. This principle was established as early as 1954, when the United States, with United Nations acquiescence, denied a visa to [Iraq] Eskandary, who had been convicted of conspiring to kill the Shah. We argued that ‘no one would expect the United States to permit such a person to come to the United States, no matter what his United Nations business.’ This principle has been confirmed in recent United Nations practice.*” [Citing additional instances in 1982, 1983, 1984, 1985, 1986, and 1988.]²³

Raisi Can Address the UN Remotely:

In this virtual era, Ayatollah Raisi can address the United Nations from Teheran, without jeopardizing U.S. security by entering the U.S. with his delegation. Indeed, in September 2021, Raisi addressed the UN remotely. Raisi did not need to travel to New York to give his 2021 speech disparaging both “America First” and “America is Back” (the previous and current U.S. administrations), and accusing the U.S. of “crimes against humanity.”²⁴ Raisi can do this again from a distance, so that U.S. security is not jeopardized by Raisi and his agents’ presence in New York.

Conclusion:

In light of the risks posed by Iran’s efforts to murder or kidnap American officials and others, and Raisi’s human rights violations, we urge you to deny visas to Ayatollah Seyyed Ebrahim Raisi and his delegation.

Main Contact:

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Sincerely,

Americans Against Antisemitism	Americans for a Safe Israel
Americans for Peace & Tolerance	American Friends of Ateret Cohanim
AMIT	Coalition for Jewish Values (CJV)
Proclaiming Justice to the Nations (PJTN)	Emunah
Endowment for	Hadassah: The Women’s Zionist
Middle East Truth (EMET)	Organization of America
Iranian-Americans for Liberty	One Israel Fund
Pen & Shield Ltd.	Republican Jewish Coalition (RJC)
StopAntisemitism.org	Students Supporting Israel (SSI)
The Lawfare Project	Zionist Organization of America (ZOA)

¹ “Iran State Media Warns U.S. It Can Build Atomic Bombs, Turn NY Into ‘Ruins,’” by Zoe Strozewski, *Newsweek*, Aug. 1, 2022, <https://www.newsweek.com/iran-state-media-warns-us-it-can-build-atomic-bombs-turn-ny-ruins-1729792>

² “Raisi to Attend UN General Assembly in New York,” *Teheran Times*, Aug. 2, 2022, <https://www.tehrantimes.com/news/475307/Raisi-to-attend-UN-General-Assembly-in-New-York>

³ “Cotton, Colleagues Demand Biden Deny Iranian President Raisi Visa to New York,” Aug. 2, 2022, <https://www.cotton.senate.gov/news/press-releases/cotton-colleagues-demand-biden-deny-iranian-president-raisi-visa-to-new-york>

⁴ *Id.*, citing “Iran Plotting Assassination of John Bolton, Others, Even While Biden Negotiates Nuclear Deal,” by Tom Rogan, *Washington Examiner*, Mar. 7, 2022, <https://www.washingtonexaminer.com/restoring-america/courage-strength-optimism/iran-plotting-assassination-of-john-bolton-others-even-while-biden-negotiates-nuclear-deal>; and “U.S. Government Warns that Iran may Try to Kill American Officials as Revenge for Killing Top General,” by Jana Winter, *Yahoo News*, July 13, 2022, <https://news.yahoo.com/exclusive-us-government-warns-iran-may-try-to-kill-american-officials-in-revenge-for-killing-top-general-162641423.html> See also “US Intelligence Uncovers Plot by Iran’s Quds Force to Assassinate John Bolton: Report,” *Al-Arabiya*, Mar. 8, 2022,

<https://english.alarabiya.net/News/middle-east/2022/03/07/US-intelligence-uncovers-plot-by-Iran-s-Quds-Force-to-assassinate-John-Bolton-Report>

⁵ *Id.*

⁶ “Member of Iran’s Islamic Revolutionary Guard Corps (IRGC) Charged with Plot to Murder the Former National Security Advisor,” U.S. Dep’t of Justice, Aug. 10, 2022, <https://www.justice.gov/opa/pr/member-irans-islamic-revolutionary-guard-corps-irgc-charged-plot-murder-former-national>

⁷ “Iran Refuses to Abandon Avenging Soleimani Despite U.S. Offers,” Reuters, Apr. 21, 2022 <https://www.reuters.com/world/middle-east/iran-has-rejected-us-offers-lift-sanctions-exchange-tehran-abandoning-soleimani-2022-04-21/>

⁸ “Iran Doubles Down on U.S. Assassination Campaign Despite Biden Offer on Terror Designation,” by Jimmy Quinn, Nat’l Review, Apr. 22, 2022, <https://www.nationalreview.com/corner/iran-doubles-down-on-u-s-assassination-campaign-despite-biden-offer-on-terror-designation/>

⁹ “Assistant Attorney General Matthew Olsen Delivers Remarks at Press Conference Announcing Transnational Repression Charges,” U.S. Dept. of Justice, Mar. 16, 2022, <https://www.justice.gov/opa/speech/assistant-attorney-general-matthew-olsen-delivers-remarks-press-conference-announcing>

¹⁰ “Two Men Charged in Alleged Plot to Assassinate Saudi Arabian Ambassador to the United States,” U.S. Dept. of Justice, Oct. 11, 2011, <https://www.justice.gov/opa/pr/two-men-charged-alleged-plot-assassinate-saudi-arabian-ambassador-united-states>

¹¹ “Author Salman Rushdie Attacked at New York Event,” by Ginger Adams Otis, *Wall Street Journal*, Aug. 12, 2022, <https://www.wsj.com/articles/salman-rushdie-attacked-at-new-york-event-11660320109>; “Iranian Media Outlets Add to Bounty for Killing Britain’s Rushdie,” by Parisa Hafezi, *Reuters*, Feb. 22, 2016, <https://www.reuters.com/article/us-iran-rushdie/iranian-media-outlets-add-to-bounty-for-killing-britains-rushdie-idUSKCN0VV1TI>

¹² “Iran’s Assassinations and Terrorist Activity Abroad,” U.S. State Department Fact Sheet, May 22, 2020, <https://2017-2021.state.gov/irans-assassinations-and-terrorist-activity-abroad/index.html>

¹³ “Belgium Ratifies Controversial Prisoner Swap Treaty With Iran,” *France24*, July 21, 2022, <https://www.france24.com/en/diplomacy/20220721-belgium-ratifies-controversial-prisoner-swap-treaty-with-iran>

¹⁴ “Treasury Designates Supreme Leader of Iran’s Inner Circle Responsible for Advancing Regime’s Domestic and Foreign Oppression,” U.S. Dept. of Treasury, Nov. 5, 2019, <https://home.treasury.gov/news/featured-stories/treasury-designates-supreme-leader-of-irans-inner-circle-responsible-for-advancing-regimes-domestic-and-foreign-oppression>; and “Taking Stock of Iran’s Crimes Against Humanity 30 Years After 1988 Massacre,” by Reza Shafiee, *Al-Arabiya*, Aug. 10, 2018, <https://english.alarabiya.net/features/2018/08/10/Taking-stock-of-Iran-s-crimes-against-humanity-30-years-after-1988-massacre>. Further, the U.S. House of Representatives overwhelmingly (410-2) passed a resolution to hold the Iranian regime and its leaders accountable for its brutality, which found that Iran’s 1988 mass hangings and firing squads included executions of children and pregnant women. H.R.4744 (Apr. 26, 2018), Sec. 2(a)(7) Findings, <https://www.congress.gov/bill/115th-congress/house-bill/4744/text>

¹⁵ “Raisi: Role in 1988 Massacre,” by Andrew Hanna, U.S. Institute of Peace, July 21, 2021, <https://iranprimer.usip.org/blog/2021/jul/21/raisi-role-1988-massacre>

¹⁶ “Iran: The 1988 Massacre of 30,000 Political Prisoners,” National Council of Resistance of Iran, Dec. 27, 2020, <https://www.ncr-iran.org/en/news/human-rights/the-1988-massacre-in-iran/>

¹⁷ Executive Order 13876, “Imposing Sanctions With Respect to Iran,” June 24, 2019, Section 5, at <https://www.federalregister.gov/documents/2019/06/26/2019-13793/imposing-sanctions-with-respect-to-iran>

¹⁸ Note from Warren R. Austin, U.S. Representative to the United Nations, to UN Secretary General Trygve Lie, Nov. 21, 1947, <https://treaties.un.org/doc/Publication/UNTS/Volume%2011/volume-11-I-147-English.pdf>

¹⁹ “Joint Resolution Authorizing the President to bring into effect an agreement between the United States and the United Nations for the purpose of establishing the permanent headquarters of the United Nations in the United States and authorizing the taking of measures necessary to facilitate compliance with the provisions of such agreement, and for other purposes,” S. J. Res. 144, Public Law 80-357, 61 Stat. 756, 767-768, Annex 2, Section 6 (passed by Senate July 21, 1947, amended and passed by House and agreed to by Senate July 26, 1947, approved by the President, Aug. 4, 1947), <https://usun.usmission.gov/wp-content/uploads/sites/296/218083.pdf>. See also “

Summary of Congressional Action on Foreign Policy Bills, Third Quarter 1947,”

<https://library.cqpress.com/cqalmanac/document.php?id=cqal47-1398267>

²⁰ *cf.*, “*The Aboutalebi Visa Denial: U.S. Law and Historical Precedents*,” by John Bellinger, *Lawfare*, Apr. 13, 2014, <https://www.lawfareblog.com/aboutalebi-visa-denial-us-law-and-historical-precedents> ; “*Controversy on Raisi Visa for U.N. Summit*,” U.S. Institute of Peace, Aug. 5, 2021,

<https://iranprimer.usip.org/blog/2021/aug/05/controversy-raisi-visa-un-summit>

²¹ Public Law 113-100 (originally S.2195), “*An act to deny admission to the United States to any representative to the United Nations who has been found to have been engaged in espionage activities or a terrorist activity against the United States and poses a threat to United States national security interests.*” (enacted 04/18/2014), codified at 8 U.S. Code § 1182(a)(3)(B)(i)(I) & (III) (Inadmissible aliens include “*Any alien who has engaged in terrorist activity*” or “*has, under circumstances indicating an intention to cause death or serious bodily harm, incited terrorist activity*”). <https://www.law.cornell.edu/uscode/text/8/1182> ; and

<https://www.govinfo.gov/app/details/PLAW-113publ100>.

²² “*Cotton, Colleagues Demand Biden Deny Iranian President Raisi Visa to New York*,” *ibid*, citing “*U.S. Denies Entry Visa to Arafat*,” by Don Oberdorfer, *Washington Post*, Nov. 27, 1988; “*Obama Blocks Visa for Iran’s U.N. Ambassador*,” by Ken Dilanian, *Los Angeles Times*, Apr. 18, 2014, <https://www.latimes.com/world/worldnow/la-fg-wn-obama-visa-iran-un-ambassador-20140418-story.html> ; and “*U.S. Denies Iran’s Zarif a Visa to Attend U.N.: U.S. Official*,” Reuters, Jan. 6, 2020, <https://www.reuters.com/article/us-iraq-security-un-zarif/u-s-denies-irans-zarif-a-visa-to-attend-u-n-u-s-official-idUSKBN1Z605T>

²³ Patricia M. Byrne, *quoted in* Digest of United States Practice in International Law, Book 1, p. 391-2 (citing Press Release USUN-154, 88, Nov. 28, 1988),

https://books.google.com/books?id=I2nb0aJqFc8C&pg=PA391&lpg=PA391&dq=1954+Eskandary+visa&source=bl&ots=0pl9w0R3L0&sig=ACfU3U3UNSeU5mX9YEZ5i7sC6o4ADOs-8g&hl=en&sa=X&ved=2ahUKEwimrcDQ_bj5AhXLM1kFHa5FD8cQ6AF6BAgUEAM#v=onepage&q=1954%20Eskandary%20visa&f=false

²⁴ “*Ayatollah Raisi at the 76th UNGA Session*,” text of remote address, <https://www.president.ir/en/131476>