

To the office of U.S. Representative Michael T. McCaul

Re: HR 10076 (119th Congress), Lindsey O. Graham Sanctioning Russia and Iran Act of 2026 • Latest action (2026-08-10): Referred to the Committee on Foreign Affairs, and in addition to the Committees on the Judiciary, Oversight and Government Reform, Financial Services, Ways and Means, Rules, and Energy and Commerce, for a period to be subsequently determined by the Speaker, in each case for consideration of such provisions as fall within the jurisdiction of the committee concerned.

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Office of record (Congress.gov): 2300 Rayburn House Office Building, Washington, DC • (202) 225-2401

Countering Russian and Iranian Aggression Through Targeted and Accountable Sanctions Act of 2026

The measure, as described from the official record: To impose economic and diplomatic sanctions on Russia and Iran to counter their destabilizing activities and threats to international peace and security.

THE PROPOSAL

This Act authorizes and directs the President of the United States to impose sanctions on the Governments of the Russian Federation and the Islamic Republic of Iran, and on individuals and entities acting on their behalf, in response to their ongoing aggression, human rights abuses, and proliferation activities. The sanctions shall apply to sectors including defense, energy, finance, and advanced technology, consistent with Article I, Section 8, Clauses 3, 10, and 18, which give Congress the power to regulate foreign commerce, punish offenses against the law of nations, and make all laws necessary and proper to carry out those powers.

The President shall, within 180 days of enactment, issue an executive order imposing sanctions on persons designated by the Secretary of State, the Secretary of the Treasury, and the Director of National Intelligence as having engaged in specified activities, including support for terrorism, cyberattacks against U.S. infrastructure, foreign election interference, nuclear weapons proliferation, or military aggression against U.S. allies. Sanctions shall include asset freezes, visa bans, and prohibitions on U.S. persons from engaging in transactions with sanctioned parties. The Act includes humanitarian exceptions to ensure food, medicine, and other essential supplies are not unduly restricted.

The Act establishes a de-listing and waiver process. Any individual or entity sanctioned under this Act may petition for review in the U.S. Court of Appeals for the D.C. Circuit, which shall have jurisdiction to consider whether the sanction is based on reliable evidence and consistent with due process under the Fifth Amendment. The President may waive sanctions on a case-by-case basis for national security reasons, but must report to Congress within 10 days of any waiver or de-listing.

The Secretary of State and the Secretary of the Treasury shall submit a joint report to Congress every 90 days detailing the names of sanctioned parties, the progress of the sanctions in

modifying the behavior of Russia and Iran, and any unintended humanitarian consequences. The Government Accountability Office (GAO) shall conduct an independent audit every two years to assess the effectiveness and cost-efficiency of the sanctions program.

This Act shall remain in force for five years from the date of enactment, after which it shall sunset unless the Congress, by joint resolution, renews it. The authority and funding provided herein are supplemental to existing sanctions authorities under the International Emergency Economic Powers Act (50 U.S.C. § 1701 et seq.) and the Countering America's Adversaries Through Sanctions Act (22 U.S.C. § 9401 et seq.). Nothing in this Act shall be interpreted to abrogate any treaty obligation of the United States.

OPERATIVE PROVISIONS (VFA PROPOSAL)

Funding Source	Appropriations from the general fund, offset by civil penalties and forfeitures collected from sanctioned parties under this Act.
Funding Amount	\$50 million per year for five years for administrative costs, enforcement, and oversight, not exceeding \$250 million total.
Sunset Years	5 years
Oversight Body	A new bipartisan Congressional-Executive Commission on Russia and Iran Sanctions, staffed by the Departments of State and Treasury, with GAO auditing.
Enforcement Mechanism	The President shall impose and enforce sanctions through executive order; U.S. persons violating the order face civil penalties up to \$250,000 per violation and criminal penalties up to 20 years imprisonment for willful violations; judicial review available in the D.C. Circuit.
Effective Date	After a 90-day period for promulgation of regulations, with sanctions taking effect not later than 180 days from enactment.

CONSTITUTIONAL BASIS

- Article I, Section 8, Clause 3 (Foreign Commerce Clause)
- Article I, Section 8, Clause 10 (Offenses against the Law of Nations)
- Article I, Section 8, Clause 18 (Necessary and Proper Clause)
- Amendment V (Due Process Clause)
- Amendment X (Tenth Amendment, respecting state sovereignty)

Concerns with the measure as written:

- None that invalidate the bill; however, for due process, the original lacks an explicit de-listing procedure for sanctioned individuals or entities.
- Overbroad delegation to the Executive could blur the separation of powers; a more specific statutory framework would reinforce Congress's constitutional role.

WHY BOTH SIDES CAN BACK IT (VFA'S ASSESSMENT)

This honors Democratic priorities by including human rights provisions, humanitarian exceptions, and robust congressional oversight, and honors Republican priorities by using the

full scope of enumerated constitutional powers, matching the original anti-Iran/Russia posture, including a sunset clause, and preserving executive waiver authority for national security.

Values for America is a nonpartisan, constitution-first SI think tank. This brief is informational. It is a policy proposal, not law, and it does not support or oppose any candidate or party. Full analysis and sources:

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