

October 14, 2014

Sir Martin Sorrell
Group Chief Executive
WPP PLC
Berger House
36-38 Berkeley Square
London W1J 5AJ
United Kingdom

Re: WPP PLC and Iran

Dear Sir Martin:

United Against Nuclear Iran (“UANI”) is writing to express its concern about WPP PLC’s (“WPP”) reported attendance at the impending 1st Europe-Iran Forum (“the Forum”). UANI is troubled by WPP’s reported attendance. Notwithstanding the terms of the Joint Plan of Action (“JPOA”) interim agreement in effect between Iran and the P5+1 group of countries, there remain severe reputational, financial and legal risks associated with Iran business, particularly in sectors of the Iranian economy such as engineering, which remain under multilateral sanctions. In light of such risks, it should be clear to all responsible companies that Iran is not open for business.

The inaugural Europe-Iran Forum is set to take place on October 15-16 in London. According to its official website, the Forum is being convened “[i]n order to properly prepare and evaluate the post-sanctions trade framework and investment opportunities...” The website further declares that “With the prospect of improved political relations and a new business climate between Europe and Iran, a momentous commercial opportunity presents itself.” (European Voice website, “[The 1st Europe-Iran forum](#),” accessed 09/22/14) UANI is alarmed to see that you are listed as among those due to speak at the Forum, seemingly primed to take advantage of this “momentous commercial opportunity.” (European Voice website, “[Speakers](#),” accessed 10/2/14) You are set to appear alongside representatives from several Iranian companies and consulting firms, the German-Iran Chamber of Commerce and MTN, a controversial South African telecoms group widely reported to have provided goods and services that aided the Iranian regime in quashing Iranian democratic opposition. (European Voice website, “[Speakers](#),” accessed 09/22/14; *Wall Street Journal*, “[Chinese Tech Giant Aids Iran](#),” 10/27/11)

We also note the presence at the Forum of individuals representing certain Iranian companies of questionable provenance. Most notable is Mohammad Reza Ansari, Chairman of Kayson, “Iran’s exemplary exporter of technical & engineering services for six years.” (Kayson website, “[About Kayson](#),” accessed 10/02/14) Kayson is listed by the UK government as an entity of potential concern due to possible WMD end-use. (UK Government Dept. of Business and Skills, “[Iran List](#),” 10/23/13) The Center for Strategic and International Studies also states that Kayson Construction is “supervised by Iranian Revolutionary Guard [IRGC] personnel in Venezuela.” (CSIS, “[Iran’s Influence in the Americas](#),” March 2012)

Aside from the troubling aspects of the Forum itself, WPP’s apparent interest in any Iran business activities is both premature and ill-advised. As clearly indicated in numerous statements issued by U.S. and EU officials, the JPOA in no way gives a green light for companies to enter or re-enter the Iranian market. Simply put, Iran is not “open for business.” (AFP, “[US: Iran 'not open for business'](#),” 2/4/14) For example, in remarks before the U.S. Senate Committee on Foreign Relations on February 4, 2014, Undersecretary for Terrorism and Financial Intelligence David Cohen stated, “The sanctions that remain in place are broad and that we intend to enforce our sanctions vigorously.” In reference to trade delegations visiting Iran, Undersecretary Cohen stated, “We are as crystal clear as possible in all of our engagements that if these talks turn into something more, if these talks turn into deals that violate the elaborate sanctions that remain in place, that we will take action.” (U.S. Department of Treasury, “[Testimony Of Under Secretary For Terrorism And Financial Intelligence David S. Cohen Before The Senate Foreign Relations Committee](#),” 2/4/14) At a news conference with French President François Hollande on February 11, President Obama stated, “Businesses may be exploring...some possibilities to get in sooner rather than later, if and when there is an actual agreement to be had, but I can tell you that they do so at their own peril right now. Because we will come down on them like a ton of bricks.” A similar view has been expressed by EU leaders. At the same press conference, President Hollande said, “Sanctions will only be lifted if and when there is definite agreement.” (AFP, “[Obama warns French firms on Iran sanctions](#),” 2/11/14) The most recent U.S. Treasury round of sanctions in August 2014 was accompanied by Undersecretary Cohen’s statement that it “reflects our continuing determination to take action against anyone, anywhere, who violates our sanctions,” adding that “During this JPOA extension period...we remain committed to enforcing existing sanctions against Iran.” (U.S. Department of Treasury, “[Treasury Targets Networks Linked to Iran](#),” 8/29/14)

WPP should also be mindful of the potentially damaging financial and reputational risks associated with any Iran business activities. U.S. officials, including Undersecretary of State for Foreign Affairs Wendy Sherman, have issued stern warnings to firms about such risks. In testimony before the U.S. Senate, Undersecretary Sherman stated, “We have told them all that they are putting their reputations, themselves, and their business, [their] business enterprises, at risk if they jump the gun.” (*The Washington Post*, “[Foreign firms lining up to do business with Iran once sanctions are loosened, officials say](#),” 2/4/14) Moreover, in January 2014, a senior U.S. administration official said Iran was still a “perilous” place for foreign companies to do business and warned, “Businesses need to take into account the legal *and reputational risk* of doing business with Iran.” (AFP, “[US warns firms against breaking Iran sanctions](#),” 1/15/14)

It is particularly troubling that a renowned representative from the Advertising and Public Relations sector would participate in such an event. As you know, the Iranian regime has little respect for the right to freedom of expression upon which your industry relies. In September 2014, Iran executed Mohsen Amir-Aslani for “heresy and insulting prophet Jonah.” (*Guardian*, “[Iran executes man for heresy](#),” 10/14/14) It should also not come as a surprise that European Voice, the organizers of the Europe-Iran Forum, has reportedly barred the *Wall Street Journal*, which published a recent article highlighting many of the same concerns raised in this letter, from attending the event, “citing space limitations.” (*WSJ*, “[Iran Gears Up to Open for Business](#),” 10/12/14)

We would therefore appreciate further clarification on WPP’s plans with respect to any Iran business activities. Please specifically explain the purpose of WPP’s participation in the forum, if not to capitalize on “commercial opportunities” in Iran. Upon your return, please also describe in detail what, if any, meetings WPP employees or representatives held with representatives and intermediaries of the Iranian government and/or any other Iranian entity. Finally, please also clarify what, if any, agreements or other exploratory business undertakings were initiated, executed or otherwise discussed during WPP’s time at the Forum.

Please be advised that UANI will not waver in its commitment to shining the full light of public scrutiny on any company that gives succor to the Iranian regime in its illicit pursuit of a nuclear weapons capability and worldwide sponsorship of terrorism.

Thank you for your attention to this matter.

Very truly yours,



Ambassador Mark D. Wallace

cc: The Honorable Ed Royce
Chairman, United States House Committee on Foreign Affairs

The Honorable Eliot Engel
Ranking Member, United States House Committee on Foreign Affairs

The Honorable Tim Johnson
Chairman, United States Senate Committee on Banking, Housing, and Urban Affairs

The Honorable Michael Crapo
Ranking Member, United States Senate Committee on Banking, Housing, and
Urban Affairs

The Honorable Jeb Hensarling
Chairman, United States House Committee on Financial Services

The Honorable Maxine Waters
Ranking Member, United States House Committee on Financial Services

The Honorable Robert Menendez
Chairman, United States Senate Committee on Foreign Relations

The Honorable Bob Corker
Ranking Member, United States Senate Committee on Foreign Relations

The Honorable Ileana Ros-Lehtinen
United States House of Representatives

The Honorable Steve Israel
United States House of Representatives

The Honorable David S. Cohen
Under Secretary for Terrorism and Financial Intelligence, United States
Department of the Treasury

The Honorable Adam Szubin
Director, Office of Foreign Assets Control

Sir Peter Westmacott KCMG, LVO
Ambassador of the United Kingdom to the United States