

MAXIMUM SUPPORT FOR THE IRANIAN PEOPLE: A NEW STRATEGY

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INTRODUCTION

U.S. policy since the 2009 election-related uprising in Iran has gradually incorporated a variety of human rights related sanctions and designations to name, shame, penalize, and deter Iranian officials and institutions that commit human rights abuses.¹ Yet U.S. policy toward the Islamic Republic of Iran has prioritized Tehran’s nuclear program and, to a considerably lesser extent, its ballistic missile program and material support for international terrorism, but not human rights. The ongoing street protests in Iran, as well as the evolving pattern of anti-regime protests in Iran since 2017, illustrate the need for developing — in addition to a “maximum pressure” strategy on the regime that incorporates all tools of American power — a transnational strategy of “maximum support” for the Iranian people.² This memorandum provides recommendations for implementing such a strategy, which should be a centerpiece of U.S. policy.

Any such policy shift must take a critical fact into account: Any further negotiations over the revival of the 2015 nuclear deal, formally known as the Joint Comprehensive Plan of Action (JCPOA), would likely have a detrimental effect on any U.S. and allied efforts to support anti-regime protestors. Tehran would assess that international pressure, however robust amid demonstrations, would ultimately fade. A financial windfall of an estimated \$1 trillion by 2030 under a renewed agreement would enable the regime to withstand both internal and external pressure.³ To fully support the protest movement, the White House should make clear that all offers of sanctions relief for the regime are off the table. Keeping the door open to a nuclear deal undermines the protestors and strengthens the regime.

U.S. bilateral and multilateral policies underpinning a “maximum support” strategy to Iranian protestors should include communications support and political and financial backing while also increased sanctioning of regime

1. This memorandum builds on and borrows from a recent FDD op-ed: Behnam Ben Taleblu and Saeed Ghasseminejad, “How Biden Can Stand With the Iranian People,” *The National Interest*, October 5, 2022. (<https://nationalinterest.org/blog/middle-east-watch/how-biden-can-stand-iranian-people-205189>)

2. Saeed Ghasseminejad, Behnam Ben Taleblu, and Eliora Katz, “Evolution Toward Revolution: The Development of Street Protests in the Islamic Republic of Iran,” *Journal of International Affairs*, October 29, 2020. (<https://jia.sipa.columbia.edu/evolution-toward-revolution-development-street-protests-islamic-republic-iran>) For relevance to U.S. policy, see: Behnam Ben Taleblu and Saeed Ghasseminejad, “Towards A Bipartisan Iran Protest Policy Playbook,” *Radio Farda*, November 21, 2019. (<https://en.radiofarda.com/a/towards-a-bipartisan-iran-protest-policy-playbook/30284555.html>)

3. Saeed Ghasseminejad, “Teheran’s \$1 Trillion Deal: An Updated Forecast of Iran’s Financial Windfall from a New Nuclear Agreement,” *Foundation for Defense of Democracies*, August 19, 2022. (<https://www.fdd.org/analysis/2022/08/19/tehrans-1-trillion-deal/>)

officials and working towards their political isolation in international organizations. This memorandum examines these categories while acknowledging that the president may consider additional active measures.

COMMUNICATIONS SUPPORT

The United States has long worked to combat censorship in Iran. In September, the Biden administration issued General License (GL) D-2, which authorized “technology companies to offer the Iranian people more options of secure, outside platforms and services,” as the Treasury Department put it in a press release.⁴ The administration should take the following additional actions to utilize information as an effective instrument against Tehran:

Provide Information to Protestors on Movement of Iranian Security Services. The Biden administration likely possesses intelligence through signals and imagery that it should share with Iranian protestors to warn them about the movement of all security services involved in repression and to inform them about Tehran’s weaknesses and strengths. The administration should also borrow from its Russia playbook with respect to the rapid declassification and dissemination of information on regime plans, potential false flag operations, disinformation operations, and other activities that put Tehran in the position of reacting to U.S. information dissemination efforts rather than driving the narrative.

Use Cyber Capabilities in Support of Protestors. The U.S. and many of its international partners have significant cyber capabilities that they should use to help protestors. Targets should include Tehran’s command and control systems, its security forces, or its massive bureaucracy, whose information and communications are likely stored in and move through clouds and internet and intranet networks. From abroad, the administration should help protestors in efforts to move from street-power to strike-power by using its cyber capacity to disrupt the normal operation of key industries. Disruption in key industries such as oil, gas, petrochemical, and financial sectors can facilitate a general labor strike across the country.

Support Labor Strikes. Labor strikes are currently ongoing in various sectors of Iran’s economy, from educational institutions to strategic sectors, such as oil and gas.⁵ Disrupting the operation of strategic sectors could give a much-needed boost to laborers to begin or continue striking and put time on the side of strikers. Oil strikes (coupled with market supply and domestic production issues) multiplied street power in the 1978–1979 protests that took down the Pahlavi monarchy in Iran.⁶ Washington should support labor strikes by using its cyber capacities to disrupt the normal operation of these strategic sectors.

Publicly Support the Iranian People. President Biden and other high-ranking officials should vigorously embrace traditional and social media to amplify and sustain their support for the Iranian people and remind demonstrators that the administration stands with them. The more U.S. officials mention the names of the victims of the regime’s repression, the more the Iranian people will know that America has not forgotten their plight.

4. U.S. Department of the Treasury, Press Release, “U.S. Treasury Issues Iran General License D-2 to Increase Support for Internet Freedom,” September 23, 2022. (<https://home.treasury.gov/news/press-releases/jy0974>)

5. “Educators’ Union Calls on Iranian Teachers and Students to Go on Strike,” *Iran Wire* (United Kingdom), September 26, 2022. (<https://iranwire.com/en/society/107929-educators-union-calls-on-iranian-teachers-and-students-to-go-on-strike/>); Maryam Sinaee, “Iran in Turmoil as Students Strike and Protests Continue,” *Iran International*, September 26, 2022. (<https://www.iranintl.com/en/202209268316>)

6. Nicholas Cumming-Bruce, “Workers Strike Iran’s Oilfields,” *The Washington Post*, November 1, 1978. (<https://www.washingtonpost.com/archive/politics/1978/11/01/workers-strike-irans-oilfields/cb475916-3413-473c-9eb0-f71d57ee1d94/>); Andrew Cooper, *Oil Kings: How the U.S., Iran, and Saudi Arabia Changed the Balance of Power in the Middle East*, (New York: Simon & Schuster, 2011), page 378. (https://www.google.com/books/edition/The_Oil_Kings/Kzh8DAAAQBAJ?hl=en&gbpv=0)

Enable Censorship Circumvention. The administration should support efforts to provide the Iranian people access to uncensored internet via satellite, consistent with Treasury’s efforts to broaden the application of general licenses for such purposes. As Iranians increasingly rely on the internet, social media applications, and mobile communications to organize as well as share information about the regime’s atrocities with the outside world, Tehran has improved its domestic cyber capabilities to censor websites and applications and to throttle or black out the internet.⁷ With a reported 80 percent of Iranians already using virtual-private networks (VPNs) and anti-filtering technologies prior to the start of these protests, measures to ensure connectivity are now critical.⁸

Reports that a limited number of Starlink terminals are already in Iran and operational are welcome news. The capacity for satellite internet to help Iranians regain internet access as the regime tightens its repression in cyberspace and doubles down on a national intranet. To ramp up the production of Starlink terminals, Washington should establish an Iran Free Internet Fund (or a similarly named entity) under public-private auspices to offer Starlink financial support for an Iran-specific acquisition program. Such an operation would be a game-changer in ending the regime’s monopoly over the internet in Iran. The United States should link this project to a maximum pressure strategy in which Washington enforces its sanctions, especially oil sanctions, confiscates shipment of illicit materials, sells them in the market, and uses the revenue to fund the Iran Free Internet Fund.

Streamline an Interagency Process. The administration should create an interagency team to ensure that Iranians get access to the necessary hardware, be it through smuggling or other means, so that technologies like Starlink can become operational.⁹ In the meantime, the team should help identify and contest the regime’s disinformation and hacking efforts that aim to mislead Iranians about the current operational status of Starlink and comparable efforts.¹⁰

SANCTIONS AND ECONOMIC MEASURES

The United States has imposed sanctions on Iran for human rights violations since the passage of the Comprehensive Iran Sanctions, Accountability, and Divestment Act of 2010. The administration should utilize sanctions and other economic measures bilaterally and in cooperation with U.S. allies and partners as effective instruments to pressure Tehran.

Sanction Members of the Islamic Republic of Iran Broadcasting (IRIB) and Those Who Provide It Material Support.¹¹ The United States designated the IRIB as a human rights abuser in the National Defense Authorization Act (NDAA) for Fiscal Year 2013, which required the president to impose sanctions on the IRIB and include it in the Treasury Department’s list of specially designated nationals and blocked persons. “The Islamic Republic of Iran Broadcasting has contributed to the infringement of individuals’ human rights by broadcasting forced televised confession and show trials,” Section 1248 of the law states.¹² President Barack Obama sanctioned the IRIB pursuant to Executive Order 13628 in February 2013 for restricting or denying the free flow of information to or from the Iranian people.

7. Lauren Mak, “Censorship in Iran: How to Access Blocked Websites,” *VPNOverview*, October 4, 2022. (<https://vpnoverview.com/unblocking/censorship/internet-censorship-iran/>)

8. “About 80 Percent of Iranians Use Tools to Circumvent Restriction on Internet, MP Says,” *Radio Free Europe/Radio Liberty*, July 7, 2022. (<https://www.rferl.org/a/iranians-circumvent-internet-restrictions/31933593.html>)

9. @ksadjadpour, *Twitter*, September 25, 2022. (<https://twitter.com/ksadjadpour/status/1574016099112329216>)

10. Maziar Motamedi, “Why Elon Musk’s Starlink Will Not Affect Protests in Iran,” *Al Jazeera* (Qatar), September 26, 2022. (<https://www.aljazeera.com/news/2022/9/26/why-elon-musks-starlink-wont-impact-protests-in-iran>)

11. Toby Dershowitz and Talia Katz, “The Case for Sanctions on the Islamic Republic of Iran’s State-Run Media,” *Foundation for Defense of Democracies*, February 27, 2020. (<https://www.fdd.org/analysis/2020/02/14/torture-and-television/>)

12. Iran Freedom and Counterproliferation Act, 22 U.S.C. §§8801-8811. ([https://uscode.house.gov/view.xhtml?req=\(title:22%20chapter:95%20edition:prelim\)%20OR%20\(granuleid:USC-prelim-title22-chapter95\)&f=treesort&num=0&edition=prelim](https://uscode.house.gov/view.xhtml?req=(title:22%20chapter:95%20edition:prelim)%20OR%20(granuleid:USC-prelim-title22-chapter95)&f=treesort&num=0&edition=prelim))

The United States should now designate the current IRIB director general, Peyman Jebelli, and every current IRIB official, producer, news director, and anchor. Treasury should also review whether banks and corporate entities are providing the IRIB with material support and designate them accordingly. In 2018, the Treasury Department established a precedent when it sanctioned Ayandeh Bank under Executive Order 13846 for its role in “having materially assisted, sponsored, or provided financial, material, or technological support for, or goods or services to or in support of, IRIB.”¹³

Expand human rights sanctions. The Biden administration should significantly expand the use of human rights sanctions against the regime in Iran. The administration should initiate a designations campaign that follows its recent designation of Iran’s morality police and select military commanders who have presided over the Islamic Republic’s latest crackdown.¹⁴ Aimed at naming, shaming, and penalizing the Iranian people’s oppressors, these sanctions should target the Law Enforcement Force (LEF), the Basij paramilitary, and IRGC commanders at regional and local levels. Designations should also explore the applicability of sanctions against governors, governors-general, and a host of political and judicial officials supportive of the crackdown at the regional and national levels. Policymakers can determine this culpability through open sources.

Sanction Senior Iranian Leadership. Washington should strengthen sanctions on Iran’s supreme leader, Ayatollah Ali Khamenei, and President Ebrahim Raisi, both of whom are currently on the Treasury Department’s blacklist but not for human-rights related offenses.¹⁵ For example, the administration should amend Executive Order 13876 — which currently targets those in the supreme leader’s office or those appointed by the supreme leader to a political position in Iran — to integrate human rights sanctions into the order’s sanctions regime.¹⁶ It should also broaden the applicability of human rights sanctions and apply sectoral sanctions to defense and intelligence sectors of the Iranian economy based on Iran’s record of human rights abuse. Washington should extend these sanctions to other pillars of the regime where there may be a financial or institutional nexus of support for Iran’s apparatus of repression.

Deny Visas for Regime-Connected Individuals in the United States. The Biden administration should use existing State Department authorities under a 2019 appropriations act to prevent the entry into the United States of Iranian gross human rights violators and their families.¹⁷ Washington should first apply this penalty to individuals on the Treasury Department’s blacklist in cases where an evidentiary basis for human rights penalties may exist. It should then be broadened against new targets. After that, the administration commenced a dialogue with international partners to persuade them to consider a visa ban against the same persons and their families. The net result would be a widening web or “no-go zone” for Iranian human rights violators and their families.

Expand Multilateral Efforts. The administration should share targeting information about human rights abusers with its international partners that possess or are developing autonomous sanctions authorities.¹⁸ The designation and accountability campaign should then be “multilateralized” against the IRGC, the LEF, regime officials, sanctions

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¹³. U.S. Department of the Treasury, Press Release, “U.S. Government Fully Re-Imposes Sanctions on the Iranian Regime as Part of Unprecedented U.S. Economic Pressure Campaign,” November 5, 2018. (<https://home.treasury.gov/news/press-releases/sm541>)

¹⁴. U.S. Department of State, Press Release, “Designating Iran’s Morality Police and Seven Officials for Human Rights Abuses in Iran,” September 22, 2022. (<https://www.state.gov/designating-irans-morality-police-and-seven-officials-for-human-rights-abuses-in-iran/>)

¹⁵. “Sanctions Search List,” Office of Foreign Assets Control, October 28, 2022. (<https://sanctionssearch.ofac.treas.gov/Details.aspx?id=26945>)

¹⁶. U.S. Executive Order 13876, “Imposing Sanctions with Respect to Iran,” June 26, 2019. (<https://www.federalregister.gov/documents/2019/06/26/2019-13793/imposing-sanctions-with-respect-to-iran>)

¹⁷. Financial Management and Budget Transparency, Pub. L. 116-94, §7031(c), pages 331-334. (<https://www.state.gov/wp-content/uploads/2020/03/7031c-of-PL-116-94-Anticorruption-and-GVHR-Visa-Sanctions-508.pdf>)

¹⁸. Joel Gehrke, “Iranian Regime Struggling with Frequent and Widespread Protests,” *The Washington Examiner*, October 1, 2022. (<https://www.washingtonexaminer.com/policy/defense-national-security/iranian-regime-protests>)

busters, censors, and others aiding the Islamic Republic's repression machine. Canada's recent sanctions against Iran's morality police, as well as those by the European Union (EU) and United Kingdom, are good examples of this, but the use of sanctions must expand to include all American partners with human rights sanctions regimes and autonomous sanctions capabilities.¹⁹

Conversely, where there are instances of entities subject to EU penalties that are yet to be targeted using State Department and Treasury Department authorities, the administration should rapidly move to bridge the transatlantic gap. The administration should also share information with foreign law enforcement agencies and investigative judges that may be pursuing charges against Iranian officials for human rights abuses.

Establish a Support Fund. The administration should create a fund to support the Iranian protest movement using penalties and past asset forfeiture actions related to Iran, akin to what was done for Poland's Solidary Movement during the Cold War.²⁰ This fund should support the efforts of Iranian laborers to engage in strikes to break the regime's will. It should also provide financial support to families of political prisoners and those who have lost breadwinners in current or past protests.

INTERNATIONAL ORGANIZATIONS

Finally, the administration should move to isolate the Islamic Republic politically by pushing for its removal from, or censure in, international organizations, while also pressuring allies to sever or downgrade their bilateral diplomatic relations.

Pressure Iran Diplomatically. European nations have recalled their ambassadors from Tehran a handful of times over the past four decades.²¹ The recent string of demarches and statements by American allies against the Islamic Republic is therefore welcome, but more can be done, such as the recent statement of joint condemnation featuring female foreign ministers from 12 states.²² The Biden administration should further instruct all U.S. delegations to walk out of any international meeting where an Iranian representative is speaking. In light of the brutal killing of

19. John Tasker, "Trudeau Slaps New Sanctions on Iran's 'Morality Police' As Protests Grip the Country," *CBC* (Canada), September 26, 2022. (<https://www.cbc.ca/news/politics/trudeau-sanctions-morality-police-iran-1.6596070>); Council Implementing Regulation (EU) 2022/1955 of 17 October 2022 Implementing Regulation (EU) No 359/2011 Concerning Restrictive Measures Directed Against Certain Persons, Entities and Bodies in View of the Situation in Iran, *Official Journal of the European Union*. (<https://eur-lex.europa.eu/legal-content/EN/TXT/HTML/?uri=OJ:L:2022:269I:FULL&from=EN>); James Cleverly, "UK Sanctions Iranian 'Morality Police' and Senior Security Officials," *Foreign, Commonwealth & Development Office*, October 10, 2022. (<https://www.gov.uk/government/news/uk-sanctions-iranian-morality-police-and-senior-security-officials>); @SenKatyG, *Twitter*, September 27, 2022 (<https://twitter.com/SenKatyG/status/1574650163653591040>)

20. U.S. Department of Justice, Press Release, "United States Prevails in Actions to Seize and Forfeit Iranian Terror Group's Missiles and Petroleum," December 7, 2021. (<https://www.justice.gov/opa/pr/united-states-prevails-actions-seize-and-forfeit-iranian-terror-group-s-missiles-and>); Adrian Karatnycky, "How We Helped Solidarity Win," *The Washington Post*, August 27, 1989. (<https://www.washingtonpost.com/archive/opinions/1989/08/27/how-we-helped-solidarity-win/443c4c9c-0a8f-4e88-8657-a6404fe11cc7/>)

21. "Netherlands Recalls Iran Ambassador Over Alleged Dissident Murders," *Radio France Internationale* (France), March 4, 2019. (<https://uk.news.yahoo.com/netherlands-recalls-ambassador-iran-155756360.html>); William Drozdiak, "German Court: Teheran Ordered Exile Killings," *The Washington Post*, April 11, 1997. (<https://www.washingtonpost.com/archive/politics/1997/04/11/german-court-teheran-ordered-exile-killings/0a33d5cc-6f2c-40ed-aa3b-7b30ce21d767/>)

22. "Germany Urges Iran to Allow Protests After Summoning Ambassador," *Reuters*, September 26, 2022. (<https://www.reuters.com/world/germany-urges-iran-allow-protests-after-summoning-ambassador-2022-09-26/>); @SenKatyG, *Twitter*, September 27, 2022. (<https://twitter.com/SenKatyG/status/1574650163653591040>?); "12 Women Foreign Ministers Condemn Iran's Crackdown," *Agence France-Presse* (France), October 26, 2022. (<https://www.france24.com/en/live-news/20221026-12-women-foreign-ministers-condemn-iran-s-crackdown>)

Mahsa Amini, as well as many other brave young female protestors, such as the 23-year-old social media influencer Hadis Najafi and the 16-year-old Nika Shahkarami, the United States should pressure relevant countries to remove Iran from the 45-member Commission on the Status of Women at the United Nations while at the same time consider bringing rights violations resolutions to the attention of other UN bodies such as the Human Rights Council or the General Assembly.²³

Condemn Iran within International Organizations. The United States should pressure the International Telecommunications Union to issue condemnations of Iran for its violations of international telecommunications laws. America should encourage European broadcasting authorities — such as the Conseil Supérieur de l'Audiovisuel in France and the Swedish Press and Broadcasting Authority — to direct audiovisual regulators to revoke the IRIB's licenses to operate. OfCom, the United Kingdom's audiovisual regulator, revoked Press TV's license in 2012 for its broadcasts of forced confessions.²⁴

Snap Back Sanctions at the UN. At any time, any original participant in the JCPOA can send a letter to the UN Security Council alleging that Iran is in significant non-performance of its commitment under the deal, triggering a 30-day clock until all prior UN Security Council resolutions return to force.²⁵ The United Kingdom, France, and Germany began this course of action in January 2020, but never completed the process for snapping back sanctions at the UN Security Council. The Trump administration attempted a unilateral snapback at the UN Security Council in August 2020, citing U.S. rights under UN Security Council Resolution 2231, but other members of the Council opposed the move. The Biden administration withdrew the U.S. snapback notification in early 2021. Washington should now restore it.²⁶

CONCLUSION

With anti-regime protests across Iran moving past the 40th day point, Washington desperately needs a strategy to better stand with the Iranian people who continue demonstrating, as well as to bring coherence toward its overall Iran policy.²⁷ The above vectors of support to the people and punitive measures against the regime can begin to do precisely that.

23. Megan Baynes, “‘We Want Everyone to Know Her Name’: TikToker Hadis Najafi, 23, Shot Dead in Iran Protests,” *Sky News* (United Kingdom), September 30, 2022. (<https://news.sky.com/story/we-want-everyone-to-know-her-name-hadis-najafi-the-23-year-old-tiktoker-shot-dead-in-iran-protests-12706404>); Gianluca Mezzofiore, Katie Polglase and Adam Pourahmadi, “What Really Happened to Nika Shahkarami? Witnesses to Her Final Hours Cast Doubt on Iran's Story,” *CNN*, October 27, 2022. (<https://www.cnn.com/2022/10/27/middleeast/iran-nika-shahkarami-investigation-intl-cmd>)

24. Kathryn Tancos, “UK Revokes Iranian Network's License,” *CNN*, January 20, 2012. (<https://www.cnn.com/2012/01/20/world/europe/uk-press-tv>)

25. Richard Goldberg, “The ‘Snapback’ of UN Sanctions on Iran,” *Foundation for Defense of Democracies*, July 9, 2020. (<https://www.fdd.org/in-the-news/2020/07/09/faq-the-snapback-of-un-sanctions-on-iran/>)

26. Edith Lederer, “Biden Withdraws Trump's Restoration of UN Sanctions on Iran,” *Associated Press*, February 18, 2022. (<https://apnews.com/article/joe-biden-donald-trump-iran-united-states-united-nations-aa8f38fa3bf7de3c09a469ec91664a3c>)

27. “Iranian Protesters Mark 40 Days Since Maysa Amini's Death,” *Voice of America*, October 26, 2022. (<https://www.voanews.com/a/iranian-protesters-mark-40-days-since-mahsa-amini-s-death-/6806212.html>)

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