





Strategy for a New Comprehensive U.S. Policy on Iran

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Foreword

By Mark Dubowitz

The Foundation for Defense of Democracies (FDD) has developed a comprehensive plan for American policymakers and allies to support the Iranian people and confront the ongoing threats from the Islamic Republic of Iran. The strategy explains how Washington can deploy multiple elements of national power, providing specific and actionable recommendations for relevant agencies of the U.S. government.

The new revolution in Iran, combined with the regime's military support to Russia, gives President Joe Biden and bipartisan majorities in Congress an opportunity to chart a new course. President Biden has recognized this imperative, vowing "we're going to free Iran."¹ Former Secretary of State Hillary Clinton recently said, "I would not be negotiating with Iran on anything right now, including the nuclear agreement."² Clinton emphasized that the United States should not "look like we are seeking an agreement [with Iran] at a time when the people of Iran are standing up to their oppressors."³

The administration has committed to Congress and to its allies that it is developing a "Plan B" to address the full spectrum of Iranian threats.⁴ We hope that this FDD plan is a useful contribution for policymakers developing that Plan B: providing intensive support to

the Iranian people while pursuing decisive coercive and constraining pressure on the regime in Tehran.

Whatever the elements of an American plan, one thing should be clear: the Biden strategy must support the current protests inside Iran and the regular eruptions of anger toward the theocracy. Even before the Iranian street erupted in 2022, after regime security services brutally murdered 22-year-old Iranian woman Mahsa Amini, protests were occurring more often and with greater intensity.

In 2009, the Green Revolution saw hundreds of thousands of Iranians take to the streets to protest the fraudulent re-election of then Iranian President Mahmoud Ahmadinejad. Nationwide protests shook the Islamic Republic in late 2017 and have occurred regularly in the years since. In November 2019, an eruption of protests spurred the clerical regime to kill as many as 1,500 demonstrators, according to Reuters.⁵

Protesters gathered in August 2021 to challenge the regime over severe water shortages, leading security forces to kill several people.⁶ Other protests in recent years have challenged many of the regime's malign policies, including its mismanaged economy, corruption, regional aggression, and human rights abuses.

The 2022 protests have gone even further, with thousands of Iranians abandoning calls for merely reforming the system; they now call for dismantling the regime. Protests have evolved from "Where is my vote?" to "What happened to the oil money?"

1. Aamer Madhani, "Biden says 'we're gonna free Iran' as protests there go on," *Associated Press*, November 4, 2022. (<https://apnews.com/article/iran-biden-middle-east-government-and-politics-22e7f6e5546a94941d20f41784314f59>)

2. Emmet Lyons, Ken Olshansky, and Haley Britzky, "Hillary Clinton says USA should not engage in nuclear talks with Iran as protestors stand up 'to their oppressors,'" *CNN*, December 1, 2022. (<https://www.cnn.com/2022/12/01/politics/hillary-clinton-iran-nuclear-talks-protests/index.html>)

3. Ibid.

4. Matthew Lee, "US, Israel say they are exploring a 'Plan B' for Iran," *Associated Press*, October 13, 2021. (<https://apnews.com/article/donald-trump-yair-lapid-antony-blinken-united-states-iran-caef029225ac28df9458e6b90cba55b5>)

5. "Special Report: Iran's leader ordered crackdown on unrest – 'Do whatever it takes to end it,'" *Reuters*, December 23, 2019. (<https://www.reuters.com/article/us-iran-protests-specialreport-idUSKBN1YR0QR>)

6. "Iran: Deadly Response to Water Protests," *Human Rights Watch*, July 22, 2021. (<https://www.hrw.org/news/2021/07/22/iran-deadly-response-water-protests>)

to “Death to the Dictator!”⁷ This has increased the vulnerability of the Islamic Republic, making it more susceptible to collapse.

America should adopt a “roll back” strategy to intensify the existing weaknesses of the regime and to support the Iranian people’s goal of establishing a government that abandons the quest for nuclear weapons and is neither internally repressive nor regionally aggressive. To accomplish this, the American administration should take a page from the playbook President Ronald Reagan first used against the Soviet Union. In the early 1980s, Reagan seriously upgraded his predecessors’ containment strategy by pushing policies designed to roll back Soviet expansionism. The cornerstone of his strategy was the recognition that the Soviet Union was an aggressive and revolutionary yet internally fragile state that Washington could defeat.

Reagan’s policy was outlined in 1983 in National Security Decision Directive 75 (NSDD-75), a comprehensive strategy that called for the use of multiple instruments of overt and covert American power.⁸ The plan included economic warfare, support for anti-Soviet proxy forces and dissidents, and an all-out offensive against the regime’s ideological legitimacy.

The Biden administration should develop a new version of NSDD-75. The administration should address every aspect of the Iranian menace, not merely the nuclear program. A narrow focus on disarmament paralyzes American policy and has deterred the Biden administration from responding to Iran’s non-nuclear misconduct out of fear that Tehran would withdraw from nuclear negotiations. Engagement with the Islamic Republic as an end in itself has reflected the same delusions that American leaders entertained about

Communist China. Those delusions of engagement made China more wealthy and more powerful and aggressive but did not moderate China’s rulers. The Iranian regime’s selection of Ebrahim Raisi — a mass-murdering⁹ cleric who is close to the supreme leader and received the lowest number of votes in a long history of fixed elections run by the Islamic Republic — as president should awaken American policymakers to the unmistakable conclusion: The Islamic Republic cannot be reformed; it must be rolled back. That is the message of the Iranian protesters.

“America should adopt a ‘roll back’ strategy to intensify the existing weaknesses of the regime and to support the Iranian people’s goal of establishing a government that abandons the quest for nuclear weapons and is neither internally repressive nor regionally aggressive.”

President Biden also should explicitly abandon the objective of returning to the JCPOA (Joint Comprehensive Plan of Action). Under that agreement, Tehran does not need to cheat to reach threshold nuclear-weapons capabilities. Merely by waiting for key constraints to sunset, the regime can emerge over the next eight years with an industrial-size enrichment program, a near-zero breakout time, an easier clandestine “sneakout” path to long-range, nuclear-armed ballistic missiles, much deadlier conventional weaponry, regional dominance, and a more powerful economy, enriched by an estimated \$1 trillion in sanctions relief, thus gaining immunity from Western sanctions.¹⁰

7. See, e.g., Dan DeLuce, “Facing a wave of public anger Iran’s regime could be in a fight for its long-term survival, experts say,” NBC News, October 29, 2022. (<https://www.nbcnews.com/news/world/facing-wave-public-anger-irans-regime-fight-long-term-survival-expert-s-rcna54535>)

8. National Security Decision Directive 75, January 17, 1983. (<https://irp.fas.org/offdocs/nsdd/nsdd-75.pdf>)

9. Tzvi Kahn, “Iran’s Leading Presidential Candidate Has Committed Crimes Against Humanity,” *RealClearWorld*, June 17, 2021. (<https://www.fdd.org/analysis/2021/06/17/irans-candidate-crimes-against-humanity>)

10. Saeed Ghasseminejad, “Tehran’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>)



At a political event in Oceanside, California, on November 3, 2022, President Joe Biden tells supporters “we’re gonna free Iran.” (Photo by Saul Loeb/AFP via Getty Images)

A new U.S. strategy regarding Iran must contribute to systemically rolling back the regime’s power. Washington should target the regime’s terrorist networks, influence operations, and proliferation of weapons, missiles, and drones. Iranian military support for Vladimir Putin’s murder of Ukrainians, and growing Russian support for the Islamic Republic’s military expansion, should be a wakeup call for Washington and Europe that Tehran’s malign activities will not remain confined to the Middle East. Biden must develop a more muscular covert action program and green-light closer cooperation with allied intelligence agencies.

Most of Washington’s actions that could push back Tehran hinge on depleting the Islamic Republic’s finances. With strong encouragement from Congress, the pre-JCPOA Obama Treasury Department and the Trump administration ran successful economic warfare campaigns targeting the Islamic Revolutionary Guard Corps (IRGC) and other regime elements. This campaign devastated Iranian government finances,

led to high inflation, spurred a collapse in oil exports and the Iranian currency, and precipitated multiple rounds of street protests. In 2019, Supreme Leader Ali Khamenei called the U.S. sanctions “unprecedented.”¹¹ In the same year, then Iranian president Hassan Rouhani compared conditions in Iran to the country’s ravaged economy during the Iran-Iraq War from 1980 to 1988.¹²

But President Trump’s pressure campaign lasted only two years (from the snapback of U.S. sanctions in November 2018 to the end of his term in January 2021) — even less considering oil sanctions waivers were ended only in May 2019. If the Biden administration restores the JCPOA, economic pressure will evaporate as hundreds of potent sanctions are lifted and an estimated \$1 trillion in sanctions relief will be released to the regime, which will then fund regional aggression and internal repression.¹³ Already, the lackluster enforcement of existing sanctions by the administration has been a boon for the regime, as oil exports to China soar and Tehran leverages a clandestine financial sanctions-busting network to access hard currency.¹⁴ FDD’s Iran plan, building on years of sanctions work by our scholars, recommends numerous actions that the Biden administration could take, including in coordination with Congress.

The nuclear reality is stark: The regime has rapidly expanded its nuclear program since the election of President Biden. The bulk of the most dangerous steps, including enrichment to 20 percent and 60 percent, as well as the installation of hundreds of advanced centrifuges, production of uranium metal, and the ongoing construction of a new facility that could be

11. Ali Khamenei, “There will be no negotiations and no war,” *Official Website of Iranian Supreme Leader Ali Khamenei*, May 14, 2019. (<https://english.khamenei.ir/news/6715/There-will-be-no-negotiations-and-no-war>)

12. “Rohani Calls For Unity As Iran Faces ‘Unprecedented’ Pressure From Sanctions,” *Radio Free Europe/Radio Liberty*, May 12, 2019. (<https://www.rferl.org/a/rohani-calls-for-iranian-unity-amid-worsening-economic-conditions/29935567.html>)

13. Saeed Ghasseminejad, “Tehran’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>)

14. Ian Talley, “Clandestine Finance System Helped Iran Withstand Sanctions Crush, Documents Show,” *The Wall Street Journal*, March 18, 2022. (<https://www.wsj.com/articles/ clandestine-finance-system-helped-iran-withstand-sanctions-crush-documents-show-11647609741>)

used for nuclear enrichment, occurred after that date.¹⁵ According to estimates, Tehran could “break out” and produce four bombs’ worth of weapons-grade uranium within weeks.¹⁶

America’s Iran strategy thus needs a credible U.S. military threat, and a corresponding shift in the U.S. defense posture in the Middle East, to deter the regime in Iran from developing nuclear weapons. Washington also needs to ensure that the regime perceives the Israeli military option as credible and likely. The FDD plan offers numerous recommendations on how to do just that.

The American pressure campaign should also undermine the regime by strengthening the pro-democracy forces in Iran. It should target the regime’s soft underbelly: its massive corruption and human rights abuses, especially against women. As the recurring protests demonstrate, the gap between the ruled and the regime is expanding. Many Iranians no longer believe that the “reformists” can change the Islamic Republic from within. After the 2009 uprisings, Khamenei alluded to his regime as being “on the edge of a cliff.”¹⁷ President Biden should convey that America will help the Iranian people push it over that edge. FDD’s Iran plan offers numerous actionable recommendations on how to support the Iranian people’s efforts to achieve this objective.

To be sure, encouraging the collapse of a brutally repressive regime like the Islamic Republic of Iran will

not be easy or predictable. It will require sustained U.S. pressure and a steely determination — perhaps over a period of years. Yet helping to free Iran remains a solution that Washington should not abjure merely because it is difficult. Ultimately, it remains the key to reducing instability in the region and advancing U.S. interests.

The Biden administration should present Iran with the choice between a new and better agreement and an unrelenting American pressure campaign, which includes the credible use of force. The nuclear issue likely will loom large for years to come. Disarmament demands should not require abandoning a campaign of pressure.

Washington does not need to have a public strategy to help collapse the clerical regime; Reagan did not have one for the USSR. Our political leaders, however, should underscore the inevitability of the fate of an ideologically, politically, and economically bankrupt regime that will end up on the “ash heap of history.”¹⁸ Reagan spoke that way about the Soviet Union in his famous 1982 Westminster speech. In 1983, he issued NSDD-75. Six years later, the Berlin Wall came down. Two years after that, the Soviet bloc collapsed.

Washington should intensify the pressure on the mullahs as Reagan did on the Soviets. We would be far better off without another dogged enemy armed with atomic weapons if we can possibly avoid it.

15. Behnam Ben Taleblu and Andrea Stricker, “Exploiting America’s Declining Pressure: Iran’s Nuclear Escalation Over Time,” *Foundation for Defense of Democracies*, July 1, 2022. (<https://www.fdd.org/analysis/2022/07/01/exploiting-americas-declining-pressure-irans-nuclear-escalation-over-time>)

16. David Albright, Sarah Burkhard, Spencer Faragasso, and Andrea Stricker, “Analysis of the IAEA Iran Verification and Monitoring Report – November 2022,” *Institute for Science and International Security*, November 16, 2022. (<https://isis-online.org/isis-reports/detail/analysis-of-iaea-iran-verification-and-monitoring-report-november-2022>)

17. “Iran’s leader: why don’t those who claimed cheating in elections apologize,” *BBC Persian* (UK), June 28, 2013. (http://www.bbc.com/persian/iran/2013/07/130728_101_khamenei.shtml)

18. President Ronald Reagan, “Ronald Reagan Address to British Parliament,” June 8, 1982. (<https://www.historyplace.com/speeches/reagan-parliament.htm>)

Introduction

This memorandum's recommendations are designed to constrain, deter, weaken, and over time reverse the Islamic Republic of Iran's capacity and will to threaten the United States, our allies and interests, and the Iranian people.

Since January 2021, the U.S. has sought to revive and build upon the Joint Comprehensive Plan of Action (JCPOA) nuclear agreement. As of this writing, given the widening protest movement inside Iran and Tehran's increasing military cooperation with Moscow, the prospects of a restored or new nuclear deal with Iran are greatly diminished.

This memorandum provides the Biden administration with a range of policy options to implement a Plan B strategy for Iran: intensive support for the Iranian people combined with decisive coercive and constraining pressure on the regime in Tehran.



A protester holds a portrait of Mahsa Amini during a demonstration in support of the Iranian people in Istanbul, Turkey, on September 20, 2022. (Photo by Ozan Kose/AFP via Getty Images)



Supreme Leader Ayatollah Ali Khamenei speaks in Tehran, Iran, on October 18, 2017. (Photo by Iranian Leader's Press Office - Handout/Anadolu Agency/Getty Images)



Hezbollah supporters perform a salute as they stand behind motorcycles carrying the group's flags in southern Lebanon on the border with Israel on May 25, 2020. (Photo by Mahmoud Zayyat/AFP via Getty Images)



Hamas militants attend a military parade on December 15, 2018, in Gaza. (Photo by Ali Jadallah/Anadolu Agency via Getty Images)



Three types of Iranian advanced centrifuges, which are key components of Iran's nuclear program. (Photo via Khorasan newspaper)

Acronyms

AIO Aerospace Industries Organization	IRGC RSSJO IRGC Research and Self-Sufficiency Jihad Research Organization
INL Bureau of International Narcotics and Law Enforcement Affairs	IRIB Islamic Republic of Iran Broadcasting
CBI Central Bank of Iran	JCPOA Joint Comprehensive Plan of Action
DIO Defense Industries Organization	JOR “Joint Operations Room”
DOE Department of Energy	KYCC “Know Your Customer’s Customer”
DHS Department of Homeland Security	PKK Kurdistan Workers Party
DOT Department of Transportation	LEF Law Enforcement Force
DEA Drug Enforcement Administration	LAF Lebanese Armed Forces
EIA Energy Information Administration	MODAFL Ministry of Defense and Armed Forces Logistics
EDBI Export Development Bank of Iran	NDAA National Defense Authorization Act
FATF Financial Action Task Force	NEC National Economic Council
GAO Government Accountability Office	NSC National Security Council
GCC Gulf Cooperation Council	OFAC Office of Foreign Assets Control
ICE Immigration and Customs Enforcement	SPND Organization of Defensive Innovation and Research
ISR intelligence, surveillance, and reconnaissance	PGMs precision-guided munitions
IAEA International Atomic Energy Agency	PSI Proliferation Security Initiative
IMF International Monetary Fund	RICO Racketeer Influenced and Corrupt Organizations Act
IO International Organization Affairs	SBIG Shahid Bagheri Industrial Group
ITER International Thermonuclear Experimental Reactor	SHIG Shahid Hemmat Industrial Group
IEI Iran Electronics Industries	SEC Securities and Exchange Commission
INKSNA Iran, North Korea, Syria Nonproliferation Act	SLVs Space/Satellite-Launch Vehicles
IRGC-AF IRGC Aerospace Force	USAGM U.S. Agency for Global Media
IRGC-AF SSJO IRGC-AF Self-Sufficiency Jihad Organization	WMD weapons of mass destruction
IRGC-QF IRGC-Quds Force	WTO World Trade Organization



RECOMMENDATIONS

National Security Council (NSC)

Structure

1. A senior NSC official, with support staff, should be designated coordinator for Iran sanctions implementation, with responsibility for overseeing implementation of the sanctions to improve coordination between departments and increase the sanctions' effectiveness. This official should coordinate overall sanctions strategy and the public rollout of specific designations and other sanctions developments. The position could be expanded to coordinate all Iran policy and could then be renamed.
2. The official should have the requisite rank (deputy assistant to the president or higher) to work directly with deputy- and under secretary-level officials in departments and agencies. The official should report directly to the national security advisor and deputy national security advisor.
3. Individual departments and agencies would retain their current sanctions authorities, except that oil sanctions coordination could shift to this new NSC office, since oil sanctions in particular require a whole-of-government response. The State Department's Bureau of Energy Resources does not have the technical expertise to assess oil market impacts as thoroughly and as accurately as does the Energy Information Administration (within the DOE). The State Department also has competing interests internally, and country and regional teams too frequently want to capitalize on oil sanctions waivers, either as quid pro quo leverage or to shield a country with which they work closely. There will be a need for maximum transparency and coordination across bilateral interactions, requiring the involvement of the national security advisor, the secretary of energy, the National Economic Council (NEC) director, Treasury, and/or the NEC staff's senior energy officials, thus justifying NSC coordination.



National Security Advisor Jake Sullivan speaks at a White House press briefing on December 12, 2022, in Washington, DC. (Photo by Nathan Posner/Anadolu Agency via Getty Images)

Policies

The NSC should coordinate the following to increase pressure in the absence of a deal:

4. Deploying Treasury and State officials to relevant countries to ensure compliance with escrow/special purpose account restrictions.
5. Tasking the intelligence community with closely monitoring all Iran-China illicit trade and identifying all Chinese entities involved in such trade. This should be a standing item for NSC coordination meetings.
6. Clearly informing the Chinese government from the first day of a sanctions continuation or resumption that the U.S. will enforce its sanctions on any entity involved in illicit purchases of oil, including state-owned enterprises.
7. Ensuring the U.S. does not grant waivers enabling China to be paid in oil pursuant to upstream investment contracts with Iran. In 2019, the Trump administration considered “an arrangement that would allow China to import Iranian oil as payment in kind for sizable investments of the Chinese oil company Sinopec in an Iranian oil field.”¹⁹ Such a “payback oil waiver” should not be allowed, since Chinese upstream investment should be deemed illicit and high-risk in the first place.
8. Directing Treasury to prepare sanctions on Chinese firms when sufficient information is available on relevant violations. Admittedly, in some cases the intelligence benefits of continued collection on a sanctions evader may outweigh the benefits of enforcement. In addition to China, Iraq and Turkey should also be monitored for oil sanctions evasion. The U.S. should prioritize assisting Iraq to develop alternative sources of energy and seek an end to Iraq’s sanctions waiver as soon as possible.
9. The U.S. should initiate or continue an NSPM-13 (National Security Presidential Memorandum) process to develop and approve an offensive cyber campaign plan for Iran.

19. Eliana Johnson, “Trump team weighs giving China a get-out-of-jail free card on Iran,” *Politico*, July 3, 2019. (<https://www.politico.com/story/2019/07/03/trump-china-iran-oil-1396052>)



RECOMMENDATIONS

Department of the Treasury

The Islamic Revolutionary Guard Corps (IRGC)

1. The U.S. should robustly enforce current sanctions, with an emphasis on targeting IRGC entities and individuals active in key sectors of Iran's economy. The emphasis should be not only on targeting IRGC entities and individuals engaged in malign conduct but also on deterring international businesses from taking the risk of doing business with the IRGC. This should involve mapping IRGC networks in relevant sectors and running information campaigns designed to change the risk/reward calculus of thousands of private sector actions.
2. The U.S. should increase awareness among Western companies of the risks of doing business with the IRGC through diplomatic meetings, public notices, conferences, hearings, legal action, and other mechanisms.
3. The U.S. should impose and enforce new sanctions on market segments — including regime-tied businesses and customers — that are connected to the IRGC or are under its influence, including sectors not yet subject to penalties. These include existing mining, metallurgy, and construction sanctions and new sanctions targeting telecommunications (with clear exceptions and/or licenses to facilitate secure communications among protesters) and computer science firms as well as academic institutions that support the regime's missile program. Enforcement of energy sector sanctions should be dramatically tightened while enforcement of automotive sector sanctions should increase as well given that sector's support for the regime's ballistic missile program.
4. The U.S. should significantly increase the number of IRGC designations to target the thousands of IRGC front companies and persons, in particular those active in strategic sectors of Iran's economy.
5. Treasury's ownership threshold for designation of an IRGC-owned or controlled entity should be lowered from 50 percent to 25 percent to conform with U.S. beneficial ownership rules.
6. U.S. secondary sanctions should be applied to foreign companies doing business with entities owned or controlled by the IRGC (even when they are not specifically listed on the specially designated nationals list).
7. The U.S. should designate sectors and supply chains of "IRGC influence."
8. The U.S. should promote the identification through watch lists (U.S. executive branch, congressional, and private) of IRGC entities that fall below the designation threshold.
9. The U.S. should enforce and/or impose sanctions on the following entities under counterterrorism (E.O. 13224) authorities or nonproliferation (E.O. 13382) authorities, as appropriate:
 - IRGC firms listed on the Tehran Stock Exchange (TSE);

- Iran Armed Forces firms on the TSE; and
- the TSE itself (for supporting companies owned or controlled by the IRGC and the Iran Armed Forces).

Hezbollah

10. The U.S. should designate relevant financial institutions pursuant to the Hizballah International Financing Prevention Act of 2015²⁰ and use the Hizballah International Financing Prevention Amendments Act of 2018²¹ to target Hezbollah's global financial and economic networks, including in Latin America and Africa, and the foreign banks and companies supporting these networks.
11. The U.S. should thoroughly review existing sanctions against Hezbollah, with special attention to Latin America and Africa, where Hezbollah is very active. Many sanctions are more than a decade old and require updates. This review will likely reveal additional illicit activities and sanctionable entities.
12. Pursuant to Section 311 of the USA PATRIOT Act, the U.S. should designate as entities of "primary money laundering concern" relevant financial institutions and banking sectors used by Hezbollah financiers, including in hubs of illicit activity such as the Tri-Border Area.
13. The U.S. should work with allies to blacklist corrupt officials who cooperate with Hezbollah. The U.S. can target such corrupt officials and their families under Section 7031 of the Department of State, Foreign Operations, and Related Programs Appropriations Act, 2022,²² permanently barring them and their families from entry into the United States; under Executive Order 13318;²³ under the Global Magnitsky Human Rights Accountability Act;²⁴ and under the Hizballah International Financing Prevention Amendments Act of 2018.²⁵
14. The U.S. should encourage and assist African and Latin American governments to strengthen their legal frameworks to investigate terrorist activities (including terror finance), particularly those related to Iran and the IRGC, as many governments still do not maintain terrorism lists.
15. The U.S. Treasury should review Israel's listings of companies that provide Hezbollah with material support for the production of precision-guided munitions (PGMs). Treasury should include those companies that meet the criteria on its Specially Designated Nationals and Blocked Persons (SDN) list and wield maximum leverage to end their cooperation with Hezbollah. The companies listed by Israel include Moubayed for Lubricants SAL, Barakat Electro Mechanical & Trading co. SARL, and

20. Hizballah International Financing Prevention Act of 2015, Pub. L. 114-102, 129 Stat. 2205, codified as amended at 50 U.S.C. §1701. (<https://www.congress.gov/114/statute/STATUTE-129/STATUTE-129-Pg2205.pdf>)

21. Hizballah International Financing Prevention Amendments Act of 2018, Pub. L. 115-272, 132 Stat. 4144, codified as amended at 50 U.S.C. §1701. (<https://www.congress.gov/115/plaws/publ272/PLAW-115publ272.pdf>)

22. Consolidated Appropriations Act of 2022, Pub. L. 117-103, 136 Stat. 49. (<https://www.congress.gov/bill/117th-congress/house-bill/2471/text>)

23. U.S. Executive Order 13818, "Blocking the Property of Persons Involved in Serious Human Rights Abuse or Corruption," December 20, 2017. (https://home.treasury.gov/system/files/126/glomag_co.pdf)

24. National Defense Authorization Act for Fiscal Year 2017, Pub. L. 114-328, 130 Stat. 2533-2538, codified as amended at 22 U.S.C. §2656. (https://home.treasury.gov/system/files/126/glomag_pl_114-328.pdf)

25. Hizballah International Financing Prevention Amendments Act of 2018, Pub. L. 115-272, 132 Stat. 4144, codified as amended at 50 U.S.C. §1701. (<https://www.congress.gov/115/plaws/publ272/PLAW-115publ272.pdf>)

Toufaily General Trading (otherwise known as TCM Tfayli). Israel asserts that these companies provide Hezbollah with oil lubricants, machinery, and ventilation systems to facilitate the PGM project.²⁶

16. The U.S. should designate, under the Shields Act, persons involved in Hezbollah's use of human shields.²⁷ This should include persons responsible for building the human shield infrastructure in Lebanon (e.g., government officials, terror operatives, construction and insurance companies, banks, licensing authorities, and material providers).

Palestinian Terror Proxies

17. The U.S. should impose sanctions on the Al-Nasser Salah al-Din Brigades, which is the third largest terror organization in the Gaza Strip but has yet to be sanctioned. Hamas and Islamic Jihad cooperate with approximately a dozen other militant factions that together comprise the "Joint Operations Room" (JOR) of the Palestinian militant factions. The Al-Nasser Salah al-Din Brigades is a major player in the JOR and has boasted about receiving military support from the regime in Tehran and its proxy Hezbollah.²⁸ Furthermore, the Brigades have published evidence of their rocket strikes against civilians in Israel.²⁹
18. The U.S. should target Hamas, Islamic Jihad, and the Al-Nasser Salah al-Din Brigades with derivative designations (on those who provide material support or assistance to terrorist groups) to increase financial and political pressure.
19. While Treasury sanctioned several Hamas companies and individuals in May 2022, others that generate revenue for Hamas remain unlisted.³⁰ Sanctioning them could help reveal more of Hamas' financial network, particularly in countries such as Turkey and Malaysia.
20. The U.S. should designate, under the Shields Act, persons involved in human shields use by Hamas, Islamic Jihad, and other Palestinian terrorist organizations allied with Iran.³¹ This should include persons responsible for building the human shield infrastructure in the Palestinian territories (e.g., regime officials, terror operatives, construction and insurance companies, banks, licensing authorities, and material providers).

26. Jonathan Schanzer and Mark Dubowitz, "PGMs: Iran's Precision-Guided Munitions Project in the Shadow of a Nuclear Deal," *Foundation for Defense of Democracies*, September 12, 2022. (<https://www.fdd.org/analysis/2022/09/12/pgms-irans-precision-guided-munitions-project-in-the-shadow-of-a-nuclear-deal>)

27. Orde Kittrie, "Time to Act on Human Shields," *Foundation for Defense of Democracies*, October 15, 2020. (<https://www.fdd.org/2020/10/15/time-to-act-on-human-shields>)

28. Joe Truzman, "Al-Nasser Salah al-Din Brigades Praises IRGC and Hezbollah for Arming Group," *FDD's Long War Journal*, November 14, 2021. (<https://www.longwarjournal.org/archives/2021/11/al-nasser-salah-al-din-brigades-praises-irgc-and-hezbollah-for-arming-group.php>)

29. @JoeTruzman, *Twitter*, May 18, 2021. (<https://twitter.com/joetruzman/status/139479449263313282>)

30. U.S. Department of the Treasury, Press Release, "Treasury Targets Covert Hamas Investment Network and Finance Official," May 24, 2022. (<https://home.treasury.gov/news/press-releases/jy0798>)

31. Orde Kittrie, "Hold Hamas Accountable for Human-Shields Use During the May 2021 Gaza War," *Foundation for Defense of Democracies*, June 23, 2021. (<https://www.fdd.org/analysis/2021/06/23/hold-hamas-accountable-for-human-shields-use-during-the-may-2021-gaza-war>); Orde Kittrie and Matt Zweig, "The Use Of Human Shields Is A War Crime. America Must Hold Terrorists Accountable," *19FortyFive*, August 25, 2022. (<https://www.19fortyfive.com/2022/08/the-use-of-human-shields-is-a-war-crime-america-must-hold-terrorist-accountable>)

Islamic Republic of Iran Broadcasting

The United States designated the Islamic Republic of Iran Broadcasting (IRIB) as a human rights abuser with the passage of the National Defense Authorization Act (NDAA) for fiscal year 2013, which required sanctions on the IRIB and its inclusion on the Office of Foreign Assets Control's (OFAC) list of SDNs and blocked persons. Section 1248 of the Iran Freedom and Counter-Proliferation Act (passed as part of the 2013 NDAA) states, "The Islamic Republic of Iran Broadcasting has contributed to the infringement of individuals' human rights by broadcasting forced televised confession and show trials."³² The IRIB was also designated pursuant to E.O. 13628 in February 2013 for restricting or denying the free flow of information to or from the Iranian people. Next steps should include the following:



Iranian President Ebrahim Raisi addresses his first press conference as president-elect in Tehran on June 21, 2021. (Photo by Atta Kenare/AFP via Getty Images)

21. The U.S. should continue designating IRIB officials, producers, news directors, reporters, writers, and anchors while encouraging allies to do the same.
22. Treasury should review whether banks and corporate entities are providing the IRIB with material support and designate them, just as the U.S. sanctioned Ayandeh Bank in 2018 under E.O. 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."³³
23. The U.S. should encourage and assist the International Telecommunications Union to issue additional condemnations of Iran for its violations of international telecommunications laws.
24. The U.S. should encourage its European allies to direct telecommunications regulatory authorities in EU member states to revoke the IRIB's licenses to operate. The United Kingdom's national telecommunications regulator (the Office of Communications) revoked Press TV's license in 2012 for its broadcasts of forced confessions.³⁴ The telecommunications regulators in EU member states should follow the UK's lead and revoke the IRIB's license to operate and broadcast.

32. 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))

33. 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>)

34. Kathryn Tancos, "UK revokes Iranian network's license," *CNN*, January 20, 2012. (<https://www.cnn.com/2012/01/20/world/europe/uk-press-tv>)

Telecommunications Sector

25. The U.S. should designate telecommunications companies that are majority owned by the Government of Iran, the Supreme Leader, or the IRGC. These companies are complicit not only in human rights violations but also in executing Tehran's illicit cyber campaigns. In addition to designating these telecommunications companies, the U.S. should expose and hold accountable Chinese telecommunications companies, including but not limited to Huawei, ZTE, and Tiandy, which continue to operate in Iran in violation of U.S. sanctions.³⁵ Some of these Chinese companies reportedly sell technology to Iran that is used to surveil and oppress critics of the Islamic Republic.³⁶
26. The U.S. should issue licenses to provide surveillance-circumvention technology to Iranian dissidents. The U.S. should also deny export licenses for technology that can improve the Iranian regime's ability to conduct malicious cyber intrusions against the U.S. and its allies, or to harass or censor Iranian dissidents.

Financial Sector

27. U.S. officials should notify SWIFT stakeholders, including board member banks, that all Iranian banks on the SWIFT network must be disconnected. As of October 2022, there were at least 17 Iranian banks subject to sector-based sanctions under E.O. 13902 that had not been disconnected by SWIFT as they had not been designated in connection with the regime's WMD proliferation, support for terrorism, or human rights abuses.³⁷
28. The U.S. should work to ensure that the Financial Action Task Force (FATF) maintains the mandatory countermeasures (steps members are urged to take) that it has re-imposed on Iran. The U.S. should ensure these countermeasures are maintained until Iran verifiably completes its "action plan," the steps FATF has delineated for it to address its deficiencies. Maintaining FATF countermeasures on Iran will be even more important if a new Iran deal is agreed upon and implemented, since access to SWIFT will be dependent on FATF's removing Iran from its blacklist.³⁸ Until the action plan is satisfied, the U.S. should work to ensure Iran remains on this FATF blacklist.
29. Congress should legislatively condition any lifting or weakening of Treasury's designation of Iran as a "jurisdiction of primary money laundering concern," pursuant to a USA PATRIOT Act Section 311 determination, on a presidential certification that Iran has verifiably ceased its support for terrorist organizations and is no longer a state sponsor of terrorism.³⁹
30. The U.S. should clarify through guidance, regulations, and legislation that international banks will be responsible for "Know Your Customer's Customer" (KYCC) rules for Iran-related transactions, which require the banks to subject Iran-related transactions to the requisite level of scrutiny.

35. U.S. Department of Justice, Press Release, "Huawei CFO Wanzhou Meng Admits to Misleading Global Financial Institution," September 24, 2021. (<https://www.justice.gov/opa/pr/huawei-cfo-wanzhou-meng-admits-misleading-global-financial-institution>)

36. Ghazal Vaisi, "The 25-year Iran-China agreement, endangering 2,500 years of heritage," *Middle East Institute*, March 1, 2022. (<https://www.mei.edu/publications/25-year-iran-china-agreement-endangering-2500-years-heritage>)

37. U.S. Department of the Treasury, Press Release, "Treasury Sanctions Eighteen Major Iranian Banks," October 8, 2020. (<https://home.treasury.gov/news/press-releases/sm1147>); "Financial Sanctions: Frequently Asked Questions," *U.S. Department of the Treasury*, November 5, 2018. (<https://home.treasury.gov/policy-issues/financial-sanctions/faqs/645>)

38. "Outcomes FATF Plenary, 19-21 February 2020," *Financial Action Task Force*, accessed November 4, 2022. (<https://www.fatf-gafi.org/publications/fatfgeneral/documents/outcomes-fatf-plenary-february-2020.html>)

39. USA PATRIOT Act, U.S. Department of the Treasury, 84 Federal Register 59302, November 4, 2019. (<https://www.fincen.gov/sites/default/files/2019-12/2019-23697.pdf>)

Regime Assets

31. The U.S. should track family members of senior officials who study or work in the United States, Canada, or Europe to identify the sources of their overseas cash. Such family members are reputed to live lavishly while abroad.⁴⁰ Tracking and publicizing their funding sources could embarrass the regime and help uncover unknown regime assets.
32. The U.S. should publicly announce an “Iran Kleptocracy Initiative” to systematically expose the hidden assets of corrupt regime officials and specifically note that the U.S. will examine whether regime officials or designated persons are using family members to hide assets.

Financial Support Networks for Proxies and Allies

33. The U.S. should weaken regime proxies and regional allies — particularly those designated as Foreign Terrorist Organizations and Specially Designated Global Terrorists — by strengthening or expanding related sanctions as appropriate. This should include sanctioning banks that provide services to them and otherwise targeting their funding sources.

Malign Activity

34. The U.S. should expand efforts to block flights by the U.S.-designated Mahan Air to Europe and the Gulf. These efforts should include the use of secondary sanctions to systematically target ticketing agents and ground services operators as well as banks facilitating the airline’s payments for airport services. Mahan Air is currently designated under counterterrorism authorities for support to the Islamic Revolutionary Guard Corps-Quds Force (IRGC-QF) as well as under a counterproliferation authority that targets weapons of mass destruction proliferators and their supporters. Treasury has already designated several sales agents for Mahan Air and penalized a freight forwarder for transactions involving Mahan Air.⁴¹
35. The U.S. should impose and/or enforce sanctions against targeted entities involved with:
 - Bandar Abbas Port and its operators;
 - Bandar Imam Khomeini Port;
 - Imam Khomeini Airport, Mehrabad Airport, and the Civil Aviation Organization of Iran (these designations should be under Syria-related sanctions);
 - Iran Air for transporting weapons and fighters to support the IRGC, Hezbollah, and the Assad regime;
 - regime-backed entities active in Syria; and
 - the Central Bank of Iran (CBI) and the Export Development Bank of Iran (EDBI) (under Syria-related or other non-nuclear sanctions).

40. Ostanwire, “Report: 4,000 Children of Iranian Regime Officials Living Abroad,” *IranWire* (UK), August 9, 2022. (<https://iranwire.com/en/world/106466-report-4000-children-of-iranian-regime-officials-living-abroad>); Emanuele Ottolenghi, “Iran’s Leaders Rail Against The West — And Then Send Their Children To Study And Work There,” *Business Insider*, September 5, 2014. (<https://finance.yahoo.com/news/irans-leaders-inveigh-against-west-174606615.html>)

41. U.S. Department of the Treasury, Press Release, “Treasury Designates China-based Mahan Air General Sales Agent,” May 19, 2020. (<https://home.treasury.gov/news/press-releases/sm1014>); U.S. Department of the Treasury, “OFAC Settles with Toll Holdings Limited for \$6,131,855 Related to Apparent Violations of Multiple Sanctions Programs,” April 25, 2022. (https://home.treasury.gov/system/files/126/20220425_roll.pdf)

Human Rights Abusers

36. The U.S. should sanction additional major human rights abusers and corrupt regime officials in Iran — particularly in the judiciary and the IRGC — pursuant to the Global Magnitsky Human Rights Accountability Act; the Comprehensive Iran Sanctions, Accountability, and Divestment Act; Executive Order 13553;⁴² and other authorities. To date, the Biden administration has sanctioned several key persons and entities involved in violently suppressing Iranian protests and in other human rights abuses, including the morality police and senior officials such as Minister of Intelligence Esmail Khatib and Deputy Commander of the Basij Salar Abnough.⁴³ Additional potential targets for designation include:

- Supreme Leader Ali Khamenei;
- Iranian President Ebrahim Raisi;
- Seyed Alireza Adyani, chief of the ideological-political office of the Islamic Republic’s police forces;
- Second Brigadier General Ali Azadi, chief of police forces in Kurdistan;
- Colonel Sayd Ali Safari, chief of police forces in Saqez;
- Colonel Salman Heidari, chief of police forces in Bukan;
- Colonel Abbas Abdi, chief of police forces in Diwan Dareh; and
- Colonel Mohammad Zaman Shalihar, chief of police in Babol, Mazandaran.

Ballistic Missiles

37. The U.S. should encourage and assist foreign countries and companies to impede the Iranian regime’s ballistic missile program. This should be done through official outreach to industry and businesses (like Treasury’s outreach to foreign banks)⁴⁴ in jurisdictions of concern for missile-technology procurement or broader Iran-related sanctions-busting. This outreach should raise awareness about regime proliferation practices as well as the risks of doing business with Iran.

38. Treasury should lead a broad interagency policy and intelligence review aimed at identifying additional relevant companies, state-owned entities, and sectors of the Iranian economy that support Tehran’s ballistic missile capabilities and other long-range strike capabilities. This list should be shared with U.S. allies⁴⁵ who possess relevant proliferation sanctions authorities, in order to coordinate maximum pressure.

39. The U.S. should issue an executive order frontally addressing the regime’s missile/long-range strike capabilities that are not related to the delivery of weapons of mass destruction (WMD).⁴⁶ This would

^{42.} U.S. Executive Order 13553, “Blocking Property of Certain Persons with Respect to Serious Human Rights Abuses by the Government of Iran and Taking Certain Other Actions,” September 28, 2010. (<https://home.treasury.gov/system/files/126/13553.pdf>)

^{43.} U.S. Department of the Treasury, Press Release, “Treasury Sanctions Iran’s Morality Police and Senior Security Officials for Violence Against Protesters and the Death of Mahsa Amini,” September 22, 2022. (<https://home.treasury.gov/news/press-releases/jy0969>)

^{44.} John Irish, Arshad Mohammed, and Robin Emmott, “U.S. officials on roadshow to cut Iran investment, trade: sources,” *Reuters*, June 6, 2018. (<https://www.reuters.com/article/us-iran-nuclear-usa/u-s-officials-on-roadshow-to-cut-iran-investment-trade-sources-idUSKCN1J229N>)

^{45.} Such as the United Kingdom and European Union, for starters.

^{46.} Idea noted in forthcoming ballistic missile monograph by Behnam Ben Taleblu.

do several things: give greater urgency to countering the evolving conventional missile and drone threat; streamline use of Executive Order 13382;⁴⁷ and reduce reliance on Executive Order 13949,⁴⁸ which addresses the regime's conventional arms trade in general — rather than missiles and other long-range strike capacities — and focuses more on transfers and proliferation than on production and employment.⁴⁹

40. The U.S. should continue to expose networks involved in the regime's procurement of proliferation-sensitive materials such as carbon fiber and maraging steel, missile or military-related components, and other key items for Tehran's missile and nuclear programs.⁵⁰ Wherever possible, Treasury should increase interagency cooperation with both the Commerce Department and the Department of Justice (DOJ) to fully deploy U.S. legal authorities against procurement and smuggling rings, especially in instances involving U.S.-origin equipment or technology.
41. The U.S. should enforce and/or impose new sector-based sanctions targeting key nodes of the Iranian economy that support the regime's ballistic missile program. These include existing sanctions like energy, petrochemical, metallurgy, mining, and construction and new sanctions targeting chemicals, electronics, telecommunications, and computer science.⁵¹
42. The U.S. should designate key companies and research institutions associated with advancing regime missile capabilities in mobility, survivability, precision, maneuverability, and more. The regime's missile program is growing in qualitative, not just quantitative ways, representing a fast-advancing threat for U.S. policy. One threat vector of particular concern is the regime's progress on solid propellants,⁵² both for its shorter-range systems — which Iran is increasingly employing in military operations⁵³ — and for its space/satellite-launch vehicles (SLVs), which could be a cover for the regime's intercontinental ballistic missile program.

47. U.S. Executive Order 13382, "Blocking Property of Weapons of Mass Destruction Proliferators and their Supporters," June 28, 2005. (<https://www.federalregister.gov/documents/2005/07/01/05-13214/blocking-property-of-weapons-of-mass-destruction-proliferators-and-their-supporters>)

48. U.S. Executive Order 13949, "Blocking Property of Certain Persons With Respect to the Conventional Arms Activities of Iran," September 21, 2020. (<https://www.federalregister.gov/documents/2020/09/23/2020-21160/blocking-property-of-certain-persons-with-respect-to-the-conventional-arms-activities-of-iran>)

49. Sarah Burkhard and David Albright, "Further Indications of Iran's Renewed Interest in Maraging Steel for its Nuclear Enrichment Program," *Institute for Science and International Security*, July 14, 2022. (<https://isis-online.org/isis-reports/detail/further-indications-of-irans-renewed-interest-in-maraging-steel>)

50. "Iran Web Guidance," *U.S. Department of Commerce Bureau of Industry and Security*, accessed November 4, 2022. (<https://www.bis.doc.gov/index.php/licensing/23-compliance-a-training/53-iran-web-guidance>); Sarah Burkhard and David Albright, "Further Indications of Iran's Renewed Interest in Maraging Steel for its Nuclear Enrichment Program," *Institute for Science and International Security*, July 14, 2022. (<https://isis-online.org/isis-reports/detail/further-indications-of-irans-renewed-interest-in-maraging-steel>)

51. See Richard Goldberg, Matthew Zweig, Behnam Ben Taleblu, and Saeed Ghasseminejad, "Biden, Congress Should Defend Missile Sanctions Imposed on Iran," *Foundation for Defense of Democracies*, April 27, 2021. (<https://www.fdd.org/analysis/2021/04/27/biden-congress-should-defend-missile-sanctions-imposed-on-iran>); Saeed Ghasseminejad, "Iran's Ballistic Missile Program and Economic Sanctions," *Foundation for Defense of Democracies*, March 2016. (<https://www.fdd.org/analysis/2016/03/16/irans-ballistic-missile-program-and-economic-sanctions>)

52. See Behnam Ben Taleblu, "Solid-Propellant Motor Test Proves Iran's Continuing Missile Advancement," *The National Interest*, February 2, 2022. (<https://nationalinterest.org/feature/solid-propellant-motor-test-proves-iran%E2%80%99s-continuing-missile-advancement-200245>)

53. See Behnam Ben Taleblu, "Strikes on Iraq Reveal Iran's Embrace of Missile Operations," *The National Interest*, March 27, 2022. (<https://nationalinterest.org/feature/strikes-iraq-reveal-iran%E2%80%99s-embrace-missile-operations-201431>)

43. The U.S. should continue to expose the Iran-North Korea missile relationship, in particular, cooperation on development of long-range missiles and associated engines. The Treasury Department imposed sanctions against regime defense contractors working with North Korea on such missiles in 2016.⁵⁴ According to the UN's panel of experts on North Korea sanctions, North Korea and Iran resumed cooperation on long-range missile development projects in 2020.⁵⁵
44. To strengthen the stigma of support for the regime's long-range strike programs and to avoid the mass delisting of such military entities under a new nuclear deal, the U.S. should explore the applicability of terrorism sanctions pursuant to Executive Order 13224 to entities already subject to proliferation sanctions for supporting the regime's missile, drone, and other long-range precision strike programs.⁵⁶ This would ensure that if proliferation sanctions are lifted, these individuals and entities would remain designated under different authorities. Naturally, relevant evidence would need to be demonstrated. Similarly, the U.S. should explore the applicability of proliferation and terrorism sanctions to banks, businesses, persons, or governments which facilitate the transfer of these capabilities but are not yet subject to U.S. sanctions or are using shell companies or fronts to avoid detection and designation.
45. The U.S. should increase the overall pace and scope of designations against subordinate entities and front companies that are part of the following elements of the regime's military-industrial complex: Ministry of Defense and Armed Forces Logistics (MODAFL), Defense Industries Organization (DIO), Aerospace Industries Organization (AIO), Shahid Bagheri Industrial Group (SBIG), Shahid Hemmat Industrial Group (SHIG), and Iran Electronics Industries (IEI). It is of critical importance to use counterproliferation authorities under Executive Order 13382 to target their affiliates or subordinates as well as companies engaging with those subordinates or affiliates. It should be communicated to America's European partners, which are slated to delist the above entities by October 2023, that Washington is prepared to use punitive economic measures against any actor, including in Europe, transacting with these entities (although a snapback pursuant to United Nations Security Council Resolution 2231 would render this issue moot).
46. The U.S. should increase targeting of the IRGC Aerospace Force (IRGC-AF), which is the guardian of the regime's ballistic missile arsenal. Any Iranian or foreign entity that provides support for the IRGC-AF — including its Self-Sufficiency Jihad Organization (SSJO), the Al-Ghadir Missile Command, or the entire Guard Corps' Research and Self-Sufficiency Jihad Organization (IRGC RSSJO) — should be sanctioned. Similarly, Treasury should explore sanctions against elements of the Artesh (national military) involved in the regime's precision-strike program.

54. U.S. Department of the Treasury, Press Release, "Treasury Sanctions Those Involved in Ballistic Missile Procurement for Iran," January 17, 2016. (<https://home.treasury.gov/news/press-releases/jl0322>)

55. "UN Report Says Iran And North Korea Resumed Missile Cooperation," *Radio Farda*, February 9, 2021. (<https://www.rferl.org/a/un-report-says-iran-and-north-korea-resumed-missile-cooperation/31093315.html>)

56. The administration has already stated its interest in going after Iran's precision strike capabilities. See Ian Talley and Benoit Faucon, "U.S. Plans Sanctions Against Iran's Drones and Guided Missiles," *The Wall Street Journal*, July 29, 2021. (<https://www.wsj.com/articles/u-s-plans-sanctions-against-irans-drones-and-guided-missiles-11627556400>)

Cyberattackers

47. The U.S. should expand cyber-related sanctions against Iran to target not only individuals involved in regime-backed cyberattacks and other malicious cyber activities but also the senior leaders who order attacks and the industries, companies, and research institutions that serve the regime's cyber capabilities.⁵⁷
48. The U.S. should designate the regime's Ministry of Information and Communications Technology and all its key officials in addition to already-designated former Minister Mohammad Javad Azari Jahromi⁵⁸ and current Minister Eisa Zarepour.⁵⁹ This ministry oversees the regulation and monitoring of Iran's cyberspace and is complicit in regime-backed cyberattacks.⁶⁰
49. The U.S. should enhance collection and analysis of intelligence concerning the ways Iran has previously and would likely in the future deploy cyber-enabled economic warfare attacks against U.S. partners and allies in the Middle East. This would help Washington understand when Iran is likely to launch new cyberattacks on the homeland.
50. The U.S. should cooperate closely with Israel's cyber units in defending critical infrastructure in both countries from Iranian cyberattacks. The National Security Agency and Unit 8200 of the Israel Defense Forces should take the lead in identifying opportunities for offensive cyber operations to weaken regime infrastructure and support Iranian protesters.

57. Annie Fixler, "Iran: The Dangers of Iran's Cyber Ambitions," in *The Attack on America's Future: Cyber-Enabled Economic Warfare*, Eds. Samantha F. Ravich and Annie Fixler (Washington, DC: Foundation for Defense of Democracies, 2022).

(<https://www.fdd.org/analysis/2022/10/28/the-attack-on-americas-future-cyber-enabled-economic-warfare>); Annie Fixler, Richard Goldberg, and Michael Sugden, "Washington Punishes Iranian Cyber Actors While Preparing to Enrich Regime," *Foundation for Defense of Democracies*, September 21, 2022. (<https://www.fdd.org/analysis/2022/09/21/iranian-cyber-actors>)

58. U.S. Department of the Treasury, Press Release, "Treasury Designates Iran's Minister of Information and Communications Technology in View of the Regime's Repressive Internet Censorship," November 22, 2019. (<https://home.treasury.gov/news/press-releases/sm836>)

59. "Specially Designated Nationals List Update," U.S. Department of the Treasury, October 6, 2022. (<https://home.treasury.gov/policy-issues/financial-sanctions/recent-actions/20221006>)

60. Tzvi Kahn, "U.S. Should Sanction Iran's ICT Minister," *The Cipher Brief*, July 26, 2018. (<https://www.thecipherbrief.com/column/opinion/u-s-should-sanction-irans-ict-minister>)



RECOMMENDATIONS

Securities and Exchange Commission (SEC)

1. The U.S. government should institute enhanced due diligence and disclosure requirements with regard to the Foreign Corrupt Practices Act (jointly enforced by the SEC and the DOJ)⁶¹ for firms operating in Iran. Transparency International, a respected anti-corruption organization, ranks Iran as among the most corrupt countries in the world.⁶² One large international business has been repeatedly fined for bribing Iranian regime officials to secure contracts in Iran.⁶³ Bribes paid in Iran risk subsidizing terrorist entities.



*Iranian dealers monitor the stock market at the stock exchange in the capital Tehran on May 8, 2018.
(Photo by Atta Kenare/AFP via Getty Images)*

61. U.S. Securities and Exchange Commission, “Spotlight on Foreign Corrupt Practices Act,” February 2, 2017. (<https://www.sec.gov/spotlight/foreign-corrupt-practices-act.shtml>)

62. “2021 Corruption Perceptions Index: Iran,” *Transparency International*, accessed November 4, 2022. (<https://www.transparency.org/en/cpi/2021/index/irn>)

63. U.S. Securities and Exchange Commission, Press Release, “SEC Charges Total S.A. for Illegal Payments to Iranian Official,” May 29, 2013. (<https://www.sec.gov/news/press-release/2013-2013-94.htm>); U.S. Department of Justice, “U.S. Resolves Probe Against Oil Company that Bribed Iranian Official,” October 13, 2006. (https://www.justice.gov/archive/opa/pr/2006/October/06_crm_700.html)



RECOMMENDATIONS

Department of State

IRGC, Hezbollah, and Quds Force

1. The U.S. should press the EU, UK, Canada, and Australia to designate the IRGC as a terrorist organization in its entirety. The EU should also designate the “civilian” wing of Hezbollah. (The EU has already designated Hezbollah’s military wing as a terrorist organization.) The U.S. should also persuade allies in Latin America and Africa to list Hezbollah as a terrorist organization.
2. The U.S. should deny visas to politicians, particularly those in Latin America and Africa, who facilitate Hezbollah’s illicit finance in their own jurisdictions.
3. The U.S. should press allies to halt Iranian regime activity that utilizes diplomatic missions and private businesses to support terrorism, including the targeting of Iranian diaspora communities and other terrorist conduct by regime officials.
4. The U.S. should develop and implement region-specific strategies to more effectively disrupt, degrade, and dismantle the Iranian regime’s terror network. For example, the U.S. should have specific strategies for Africa, Latin America, the Middle East, Central Asia, and Southeast Asia, including better information operations against the regime’s allies and potential allies in those regions.
5. The U.S. should statutorily increase resources for the State Department’s “Rewards for Justice” program to target — in coordination with the DOJ — key Hezbollah and Quds Force officials operating outside Iran, with an emphasis on Latin America and Europe.⁶⁴

IRGC Military Modernization

6. To ensure the regional military balance of power remains in Washington’s favor, the U.S. must pursue a concerted effort to suppress the regime’s military modernization efforts. This should include the use of executive orders and legislation to expand sanctions designations and enforcement actions related to the regime’s trade in conventional weapons. Particular emphasis must be placed on preventing Tehran’s acquisition of more advanced fighter aircraft, air defense systems, armor, cruise and ballistic missiles, and anti-access/area-denial naval weapons platforms. Where feasible, such regime acquisitions should be interdicted.
7. The U.S. should utilize both sanctions and interdiction to target Iran’s growing export of UAVs and other weapons systems to malign actors, including Russia, China, and the regime’s allies in the Middle East.

⁶⁴. “Program Overview,” *Rewards for Justice*, accessed November 4, 2022. (<https://rewardsforjustice.net/about/program-overview>)

Ideological/Political Warfare Priorities (Human Rights/Democracy)

8. The U.S. government should publicly state that it regards the Islamic Republic as illegitimate and call for free and fair elections.⁶⁵
9. The U.S. government should share appropriate intelligence with Iranian protesters to warn them about the regime's security service deployments and inform them about Tehran's weaknesses and strengths.
10. The U.S. government should also — as it has done with Russia — rapidly declassify (when appropriate) and disseminate information on the regime's plans, potential false flag operations, disinformation operations, and other activities so that Tehran must react rather than drive the narrative.
11. The U.S. should support efforts to provide the Iranian people access to uncensored internet via satellite, in keeping with Treasury's efforts to broaden the application of general licenses for such purposes.
12. The U.S. should encourage and facilitate the deployment of terminals for the Starlink satellite internet service for use by Iranian protesters. Satellite internet can help Iranians regain internet access as the regime tightens its repression in cyberspace and doubles down on a national intranet. To hasten the deployment of Starlink terminals, Washington could establish a Free Internet Fund (or similarly named entity) under public-private auspices to offer Starlink financial support for an Iran-specific acquisition program.
13. The administration should create an interagency team to ensure that Iranians get access to the necessary hardware, through smuggling or other means, so that technologies like Starlink can be utilized. The team should also help identify and contest the regime's efforts, through disinformation and hacking, to mislead Iranians about the current operational status of Starlink and comparable tools.⁶⁶
14. The U.S. should ramp up its designations campaign that follows its recent designation of the morality police and select military commanders who have presided over Iran's latest crackdown. These penalties, aimed at naming, shaming, and penalizing the Iranian people's oppressors, could target the Law Enforcement Force (LEF), the Basij, and IRGC commanders at regional and local levels. Governors, governors-general, and a host of political and judicial officials complicit in the crackdown at the regional and national levels could also be designated, if appropriate. Policymakers can determine their culpability through open sources.
15. The U.S. should broaden the scope of sanctions on the regime's supreme leader, Ayatollah Ali Khamenei, and on President Ebrahim Raisi, both of whom are already under sanctions but not for human rights violations. For example, Executive Order 13876 currently targets those in the Supreme Leader's office or those appointed by the Supreme Leader to a political position. The administration should amend the order to integrate human rights sanctions into the order's sanctions regime. It should also broaden human rights sanctions and apply them to defense and intelligence sectors of the economy, based on the regime's record of human rights abuse. Washington should extend these sanctions to other pillars of the regime with a financial or institutional nexus to support for regime repression.

65. Mark Dubowitz and Daniel B. Shapiro, "Where We Can Agree on Iran," *Politico*, January 1, 2018. (<https://www.politico.com/magazine/story/2018/01/01/where-we-can-agree-on-iran-216205>)

66. 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>)

16. The U.S. should use existing State Department authorities under a 2019 appropriations act to specifically prohibit the entry into the United States of the regime’s human rights violators and their families.⁶⁷
17. The U.S. should share actionable information about Iranian human rights abusers with its international partners that possess or are developing sanctions authorities. Washington should first focus on individuals on the Treasury Department’s blacklist in cases where relevant evidence exists of human rights violations. It should then broaden its focus to new targets. After that, the administration should commence 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 “no-go zone” for Iranian human rights violators and their families.
18. The designation and accountability campaign should then be “multilateralized” against the IRGC, the LEF, regime officials, sanctions busters, censors, and others aiding the Islamic Republic’s repression machine. Canada’s recent sanctions against the morality police, as well as those by the EU and UK, are good examples of this, but the use of sanctions must expand to include all American partners with relevant capabilities.⁶⁸
19. Where there are instances of entities or persons subject to EU penalties who have not yet been targeted with State Department and Treasury Department authorities, the administration should rapidly close the transatlantic gap.
20. The U.S. should prioritize sharing information with appropriate foreign law enforcement agencies and investigative judges that are, or are considering, pursuing charges against regime officials for human rights abuses.
21. The U.S. should encourage and facilitate creating a labor strike fund to support the Iranian protest movement, financed by penalties and past asset forfeitures related to Iran, akin to the funds provided to Poland’s Solidarity Movement during the Cold War.⁶⁹ This fund should support the efforts of Iranian workers to engage in labor strikes. It should also provide financial support to families of political prisoners and those who have lost breadwinners in current or past protests.
22. In addition to pushing for the regime’s removal from, or censure in, international organizations, the U.S. should encourage allies to sever or downgrade their diplomatic relations with Iran.
23. The U.S. should build on Iran’s ouster from the UN Commission on the Status of Women and expel or suspend Iran from other international organizations.

67. Further Consolidated Appropriations Act, 2020, Pub. L. 116-94, §7031, pages 331-334. (<https://www.state.gov/wp-content/uploads/2020/03/7031c-of-PL-116-94-Anticorruption-and-GVHR-Visa-Sanctions-508.pdf>)

68. 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:2022:2691: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>)

69. 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-smissiles-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>)

24. The Biden administration should instruct U.S. delegations to walk out of international meetings when a regime official is speaking.
25. The U.S. government should underscore that Iranian President Ebrahim Raisi's 2021 election was a rigged process that was neither free nor fair.⁷⁰ Hundreds of candidates were disqualified from running.⁷¹ The U.S. government should also emphasize that, given Raisi's prominent role in Tehran's execution of thousands of political dissidents in 1988,⁷² he deserves condemnation and prosecution in international fora.
26. The U.S. should offer a clear vision of how its relations with Iran could change if Iran were to be more free and democratic.
27. The U.S. government should condemn, prosecute, and designate all Iranian officials involved in the regime's repeated efforts to kill on American soil Iranian dissidents, including Iranian American journalist Masih Alinejad, and former U.S. officials, including former Secretary of State Mike Pompeo and former National Security Advisor John Bolton.⁷³
28. The U.S. government should repeatedly condemn the regime's 1989 fatwa against author Salman Rushdie, point out that it remains in effect, and provide additional information to prove how the regime inspired the August 2022 assassination attempt against the author.⁷⁴
29. The U.S. should more broadly prohibit regime officials, and their immediate family members, from traveling to the United States. This should include barring President Raisi from future trips to New York to address the UN.
30. Members of Congress and other U.S. officials should consider "adopting" high-profile Iranian dissidents and telling their stories publicly (as was done with Soviet-era refuseniks).



Islamic Republic of Iran President Ebrahim Raisi holds a picture of IRGC Quds Force Commander Qasem Soleimani as he speaks at the 77th session of the United Nations General Assembly at UN headquarters in New York City on September 21, 2022. (Photo by Anna MoneyMaker/Getty Images)

70. Ned Price, State Department Press Briefing, June 21, 2021. (<https://www.state.gov/briefings/departments-press-briefing-june-21-2021>)

71. U.S. Department of State, "2021 Country Reports on Human Rights Practices: Iran," accessed December 9, 2022. (<https://www.state.gov/reports/2021-country-reports-on-human-rights-practices/iran>)

72. Tzvi Kahn, "Iran's Leading Presidential Candidate Has Committed Crimes Against Humanity," *RealClearWorld*, June 16, 2021. (https://www.realclearworld.com/articles/2021/06/16/irans_leading_presidential_candidate_has_committed_crimes_against_humanity_781789.html)

73. Margaret Brennan, "U.S. intelligence shows Iran threats on U.S. soil, but Blinken and Schiff say this shouldn't derail new nuclear deal," *CBS News*, March 12, 2022. (<https://www.cbsnews.com/news/iran-threats-pompeo-nuclear-deal>); U.S. Department of Justice, Press Release, "Member of Iran's Islamic Revolutionary Guard Corps (IRGC) Charged with Plot to Murder the Former National Security Advisor," August 10, 2022. (<https://www.justice.gov/opa/pr/member-irans-islamic-revolutionary-guard-corps-irgc-charged-plot-murder-former-national>)

74. "Iran Targets Salman Rushdie," *Foundation for Defense of Democracies*, August 16, 2022. (<https://www.fdd.org/analysis/2022/08/15/iran-targets-salman-rushdie>)

31. The U.S. should encourage allied governments — including those of the EU and other democracies — to condemn Iranian human rights abuses more vociferously, including through parliamentary action as well as in trade negotiations and other fora.
32. The U.S. should increase the Iranian and international public's understanding of the depth and breadth of the regime's corruption, including by encouraging increased attention to the corruption of the Supreme Leader's holding company EIKO, the bonyads (charitable trusts), the IRGC, the clerical establishment, and other state and quasi-state entities.⁷⁵ This can be done through U.S.-backed media channels but should not be limited to Voice of America (VOA) or Radio Farda.
33. The U.S. should draw increased attention to Iran's severe societal problems — including high unemployment (25 percent among young people), drug abuse, rampant prostitution, abuse of women and minorities, pollution, skyrocketing inflation, and corruption — and prevent the Iranian regime from distorting or concealing the realities.⁷⁶
34. The U.S. should draw increased attention to Iranian human rights abuses, including the regime's high execution rate. In 2021, Iran's executions per capita were second only to those of China, and in the first half of 2022, the number of executions in Iran roughly doubled over the same period the previous year.⁷⁷ Senior U.S. officials should condemn abuses against dissidents by name and encourage condemnation of the regime by appropriate human rights fora. For example, top U.S. officials should regularly draw attention to the regime's human rights abuses in their speeches, and the State Department should call for the release of all Iranian political prisoners, including the leaders of the Green Movement.
35. The U.S. should publicize the regime's persecution of minority communities.⁷⁸

75. Babak Dehghanpisheh, "Corruption cases tarnish image of Iran's hard-line president," *The Washington Post*, July 13, 2022. (<https://www.washingtonpost.com/world/2022/07/13/iran-metropol-collapse-ebrahim-raisi-corruption/>)

76. Robert F. Worth, "In Iran, Raw Fury Is in the Air," *The Atlantic*, October 1, 2022. (<https://www.theatlantic.com/ideas/archive/2022/10/iran-protests-mahsa-amini/671616/>); "Researchers say Iran's doing nothing to protect young people from addiction," *Al-Monitor*, June 10, 2022. (<https://www.al-monitor.com/originals/2022/06/researchers-say-irans-doing-nothing-protect-young-people-addiction>); Margot Buff, "Inside Tehran's Sex Trade, A Business Hiding In Plain Sight," *Radio Free Europe/Radio Liberty*, March 7, 2021. (<https://www.rferl.org/a/iran-prostitution-sex-workers/31133070.html>); Amir Nategh, "Selling sex to survive in Iran," *BBC News* (UK), March 17, 2022. (<https://www.bbc.com/news/world-middle-east-60661875>); "Iran's president let it slip that inflation is at least 60 percent. Here's how it happened," *Atlantic Council*, September 15, 2022. (<https://www.atlanticcouncil.org/blogs/iransource/irans-president-let-it-slip-that-inflation-is-at-least-60-percent-heres-how-it-happened>)

77. Shabnam von Hein, "Execution rate doubled in Iran: Amnesty," *Deutsche Welle* (Germany), August 12, 2022. (<https://www.dw.com/en/execution-rate-doubled-in-iran-says-amnesty/a-62785618>); Giovana Faria, "Why Is Iran Executing So Many Prisoners?," *Radio Free Europe/Radio Liberty*, August 11, 2022. (<https://www.rferl.org/a/iran-death-penalty-executions-analysis-/31983557.html>)

78. Eyal Zamir, "Countering Iran's Regional Strategy," *The Washington Institute for Near East Policy*, May 8, 2022. (<https://www.washingtoninstitute.org/policy-analysis/countering-irans-regional-strategy-long-term-comprehensive-approach>); U.S. Department of State, "2021 Report on International Religious Freedom: Iran," June 2, 2022. (<https://www.state.gov/reports/2021-report-on-international-religious-freedom/iran>)

Ballistic Missile/WMD Procurement

36. The U.S. should use State Department sanctions authorities — under Executive Order 13382; under the Iran, North Korea, Syria Nonproliferation Act (INKSNA); and under other nonproliferation sanctions and measures — to supplement existing SDN listings for entities that support the regime’s long-range strike capabilities, procurement, production, and proliferation. Since some authorities have lower thresholds for designation than others, an entity that may not meet the evidentiary standard for inclusion on the SDN list could be considered under other authorities.
37. The U.S. should work with allies to expand membership in the Proliferation Security Initiative (PSI) to appropriate additional states — 107 had signed on to its principles as of August 2022.⁷⁹ It should also work with existing members to develop and enhance legal authorities and coalitions for efforts to stop the spread of WMD and associated delivery technologies.⁸⁰
38. The U.S. government should create an interagency task force to expose, punish, deter, devalue, and defeat the evolving Iranian unmanned aerial threat, including the regime’s increasingly precise ballistic and cruise missiles and its use of drones as both WMD and non-WMD delivery vehicles.
39. The U.S. government should actively enforce Executive Order 13949, which pertains to the regime’s conventional arms, and increase intelligence-sharing with law enforcement agencies (DOJ/FBI) to fight smuggling networks with a U.S. nexus where legal action may be taken.⁸¹
40. The U.S. should enhance efforts to encourage and assist relevant countries to implement their export control and other international legal obligations relating to nuclear nonproliferation. Many governments in the Middle East have a weak record of implementing such obligations, including those required by UN Security Council Resolution 1540, which is binding on all UN member states.⁸²
41. The U.S. should vigorously expose sanctions violators through systematic “name and shame” campaigns. Sanctions violations reportedly continue to occur in the United Arab Emirates (UAE).⁸³
42. The U.S. should increase efforts to coordinate with allies on bilateral and multilateral sanctions and other measures against entities supporting the regime’s missile and nuclear programs.

79. Australia, Japan, New Zealand, Republic of Korea, Singapore, and United States, “Proliferation Security Initiative Asia-Pacific Exercise Rotation Joint Statement,” August 15, 2022. (<https://www.state.gov/proliferation-security-initiative-asia-pacific-exercise-rotation-joint-statement>)

80. “PSI - Proliferation Security Initiative,” *Proliferation Security Initiative*, accessed November 4, 2022. (<https://www.psi-online.info/psi-info-en/-/2075520>)

81. U.S. Executive Order 13949, “Blocking Property of Certain Persons with Respect to the Conventional Arms Activities of Iran,” September 21, 2020. (<https://home.treasury.gov/system/files/126/13949.pdf>)

82. See, for example, countries in which to assist: David Albright, Sarah Burkhard, Spencer Faragasso, and Linda Keenan, “The Peddling Peril Index for 2021/2022,” *Institute for Science and International Security*, September 2021. (https://isis-online.org/uploads/isis-reports/documents/ThePeddlingPerilIndex2021_POD_wCover.pdf)

83. Fatima Hussein, “US sanctions UAE, Hong Kong firms that ship Iranian oil,” *Associated Press*, August 1, 2022. (<https://apnews.com/article/biden-iran-asia-donald-trump-3b8efe23b60df46ebf8ead0ac5570f08>); Benoit Faucon, “U.A.E. Trade Provides Iran With Western Goods, From Perfume to Laptops,” *The Wall Street Journal*, July 5, 2022. (<https://www.wsj.com/articles/u-a-e-trade-provides-iran-with-western-goods-from-perfume-to-laptops-11657048268>); Daphne Psadedakis, “U.S. imposes new sanctions on Iran oil exports, targets Chinese firms,” *Reuters*, September 9, 2022. (<https://www.reuters.com/markets/commodities/us-imposes-new-sanctions-iran-oil-exports-targets-chinese-uae-firms-2022-09-29>)

43. The U.S. should work with allied authorities to re-create Iran “warning lists” — like those the UK maintained prior to the JCPOA or those still retained by the Japanese Foreign Ministry — which are related to entities that may support regime proliferation activities. Unlike formal sanctions or designations, these lists serve as a warning to industries and companies that may engage with the target.
44. The U.S. should encourage and assist the EU (and UK) to retain sanctions on Iranian missile and military-related entities found in Attachment 2 of Annex 2 of the JCPOA slated for de-listing in October 2023. At the same time, the U.S. should encourage the EU (and UK) to establish parity with earlier iterations of American sanctions on Iran’s missile program to include proliferation networks.⁸⁴
45. The U.S. should work with the UK, France, and Germany to trigger the snapback provision of UN Security Council Resolution (UNSCR) 2231 to ensure the EU and UK do not delist various military entities supportive of Tehran’s missile program, such as MODAFL, AIO, DIO, IEI, SBIG, and SHIG, which are all scheduled to be delisted on Transition Day (October 2023) under the JCPOA and UNSCR 2231.⁸⁵

Gulf Cooperation Council (GCC) Allies

The U.S. should more vigorously encourage and assist the GCC — particularly Saudi Arabia, the UAE, and Bahrain — to do the following:

46. Use oil as a weapon — particularly Saudi Arabia — to drive down Iranian energy-related hard-currency earnings (and undermine Russian military support to Iran).
47. Reduce GCC business with Iran.
48. Force key international companies to choose between doing business with important GCC countries or doing business with Iran. (The U.S. should share a list of pending deals with GCC countries and encourage them to put these foreign companies to this choice.)
49. Impose sanctions on regime entities that finance terrorism and missile proliferation. Whether the snapback takes place or not, since the GCC countries (and Israel) are not parties to the JCPOA, nothing prohibits them from establishing their own sanctions lists and designating key governmental and commercial entities (including the CBI and the National Iranian Oil Company, or NIOC) that are engaged in financing terrorism or missile proliferation. Saudi Arabia, the UAE, Bahrain, (and Israel) could publish these sanctions lists and proactively contact large multinational banks to ensure their compliance programs take these sanctions into account. The Terrorist Financing Targeting Center can be used as a means to pursue this objective.⁸⁶

⁸⁴. For example: U.S. Department of the Treasury, Press Release, “Treasury Sanctions Key Actors in Iran’s Ballistic Missile Program,” March 30, 2022. (<https://home.treasury.gov/news/press-releases/jy0689>); Victoria Giuda, “Treasury sanctions Iranian entities linked to ballistic missile production,” *Politico*, January 4, 2018. (<https://www.politico.com/story/2018/01/04/treasury-sanctions-iranian-entities-ballistic-missile-production-324977>); U.S. Department of the Treasury, Press Release, “Treasury Targets Iranian Individuals Providing Ballistic Missile Support to Yemen’s Huthis,” May 22, 2018. (<https://home.treasury.gov/news/press-releases/sm0392>)

⁸⁵. Joint Comprehensive Plan of Action, Vienna, July 14, 2015, Annex 2 Attachments. (<https://2009-2017.state.gov/e/eb/tfs/spi/iran/jcpoa/index.htm>)

⁸⁶. U.S. Department of the Treasury, Press Release, “Terrorist Financing Targeting Center Members Jointly Designate a Broad Range of Financiers of Terrorism,” June 6, 2022. (<https://home.treasury.gov/news/press-releases/jy0806>)

Other Allies and Major Powers

50. The U.S. should further expose the Iranian regime's ties to terrorism and the drug trade. This includes where appropriate declassifying intelligence revealing the links between al-Qaeda and the regime's security services.⁸⁷ The U.S. should also facilitate exposure of IRGC and other Iranian involvement in trafficking drugs to Turkey, Europe, and the United States, as well as networks in Latin America and Africa.⁸⁸

51. The U.S., in cooperation with Israel, should declassify and publicize appropriate information on Iranian missile facilities across Syria and Lebanon to expose Tehran's efforts to proliferate arms, including long-range strike weapons, across the Middle East.



Chinese President Xi Jinping meets with Supreme Leader of Iran Ali Khamenei in Tehran, Iran, on January 23, 2016. (Photo by Supreme Leader Press Office via Getty Images)

China

52. The U.S. should declare to Beijing, both privately and publicly, that Iran sanctions violations by China or Chinese entities will elicit a rigorous U.S. response. This includes resumption of "unofficial" Chinese purchases of Iranian oil with falsified identification from countries like Malaysia, the UAE, and Oman.⁸⁹

53. The U.S. should identify current and planned Chinese investments in Iran's oil, natural gas, mining, petrochemical, transportation, telecommunications, and agricultural sectors for possible inclusion in future sanctions. When appropriate, the U.S. government should publicly disclose details about such Chinese investments, highlighting that they could lead to U.S. sanctions pressure, including export controls and additional licensing restrictions.

54. The U.S. should expose Chinese culpability in the Iranian regime's malign procurement pursuits, such as in cases where Chinese components have been included in Iranian weapons or missile systems or in cases where Chinese technology or know-how has meaningfully contributed to regime human rights violations.

^{87.} Adam Goldman, Eric Schmitt, Farnaz Fassihi, and Ronen Bergman, "Al Qaeda's No. 2, Accused in U.S. Embassy Attacks, Was Killed in Iran," *The New York Times*, November 13, 2020. (<https://www.nytimes.com/2020/11/13/world/middleeast/al-masri-abdullah-qaeda-dead.html>)

^{88.} Omer Dostri, "Iran's Narco-Terrorism Policy," *Jerusalem Institute for Strategy and Security*, September 14, 2022. (<https://jiss.org.il/en/dostri-irans-narco-terrorism-policy>)

^{89.} Nidhi Verma and Shu Zhang, "Iran Slips Record Volume of Oil into China, Reaches out to Asian Clients for Trade Resumption," *Reuters*, March 8, 2021. (<https://www.reuters.com/article/us-oil-iran-asia-analysis/analysis-iran-slips-record-volume-of-oil-into-china-reaches-out-to-asian-clients-for-trade-resumption-idUSKBN2B00OL>)

Cyber Capacity-Building

55. The U.S. should expand cyber capacity-building programs with partners and allies in the Middle East.⁹⁰
56. The U.S. should fund the U.S.-Israel Cybersecurity Cooperation Enhancement Act.⁹¹
57. The U.S. should create in the Middle East an expanded version of the Assistance to Europe and Eurasia program,⁹² which supports cybersecurity efforts in Eastern Europe to improve incident response and remediation capabilities. Such a new program in the Middle East could train regional personnel on international cyberspace law, policy, and technical aspects of attribution of cyber incidents.
58. The U.S. should leverage programs within the Bureau of International Narcotics and Law Enforcement Affairs (INL) to enable regional partners to develop and implement more effective national laws, policies, and procedures to hold malign actors accountable.
59. The U.S. should expand foreign military financing for cybersecurity capacity-building efforts.
60. The U.S. should expand cybersecurity-specific funding within the Economic Support Fund and the Digital Connectivity and Cybersecurity Partnership.⁹³
61. The U.S. should replicate the successful USAID Ukraine cybersecurity programs with U.S. partners and allies in the Middle East.⁹⁴
62. The ambassador-at-large who leads the State Department's new Bureau of Cyberspace and Digital Policy should conduct a multi-nation diplomatic visit to the Middle East.

90. Mark Montgomery, "Money and Partnerships Matter in Cybersecurity," *The Cipher Brief*, August 4, 2022. (https://www.thecipherbrief.com/column_article/money-and-partnerships-matter-in-cybersecurity); Mark Montgomery, "Iranian-backed attacks on Albania highlights need for Cyber Capacity Building," *The Cipher Brief*, September 19, 2022. (https://www.thecipherbrief.com/column_article/iranian-backed-attacks-on-albania-highlights-need-for-cyber-capacity); Mark Montgomery, "Equipping U.S. Partners in Cyberspace is a Must," *The Cipher Brief*, July 11, 2022. (<https://www.thecipherbrief.com/column/cyber-initiator/equipping-u-s-partners-in-cyberspace-is-a-must>)

91. Authorized in section 1551 of the National Defense Authorization Act for Fiscal Year 2022 (FY22 NDAA). United States-Israel Cybersecurity Cooperation Enhancement Act of 2021, S. 1193, 117th Congress (2021-2022). (<https://www.congress.gov/117/plaws/publ81/PLAW-117publ81.pdf>); National Defense Authorization Act for Fiscal Year 2022, Pub. L. 117-81, 135 Stat. 1556. (<https://www.congress.gov/117/plaws/publ81/PLAW-117publ81.pdf>)

92. See, for example, U.S. Senate, Appropriations Committee, "Letter to the U.S. Senate Appropriations Committee Regarding Appropriations Requests for FY22," April 28, 2021, page 15. (<https://cybersolarium.org/correspondence/letter-to-the-u-s-senate-appropriations-committee-regarding-appropriations-requests-for-fy22>); Mark Montgomery, "Congress Invests in National Cyber Resilience but Misses Important Opportunities in the Consolidated Appropriations Act," *Lawfare*, April 1, 2022. (<https://www.lawfareblog.com/congress-invests-national-cyber-resilience-misses-important-opportunities-consolidated>)

93. See, for example, U.S. Senate, Appropriations Committee, "Letter to the U.S. Senate Appropriations Committee Regarding Appropriations Requests for FY22," April 28, 2021, page 16. (<https://cybersolarium.org/correspondence/letter-to-the-u-s-senate-appropriations-committee-regarding-appropriations-requests-for-fy22>)

94. "Cybersecurity Fact Sheet," *USAID*, May 26, 2022. (<https://www.usaid.gov/ukraine/news-information/fact-sheets/cybersecurity>)

U.S. Mission to the United Nations (USUN) and the State Department Bureau of International Organization Affairs (IO)

63. The U.S. should work with the UK, France, and Germany to trigger the snapback provision of UNSCR 2231, thereby ending all JCPOA sunsets, restoring the UN arms embargo on Iran, keeping the missile embargo on Iran indefinitely, and dramatically increasing Iran's political, strategic, and economic isolation. UNSCR 2231 requires that the triggering JCPOA participant state assert that Iran has engaged in "significant non-performance of commitments under the JCPOA." The resolution then references "Iran's statement that if" snapback occurs, "Iran will treat this as grounds to cease performing its commitments under the JCPOA."⁹⁵
64. The U.S. should frequently introduce UNSCRs against Iran to force Russian and Chinese vetoes. This would showcase Iranian malign activities and place pressure on the Russia-China-Iran axis. Such resolutions should reference the regime's human rights violations, citing the UN's special rapporteur on human rights in Iran.
65. The U.S. government should provide the UN's special rapporteur on human rights in Iran with additional material reflecting the grave human rights violations occurring in Iran.
66. The U.S. should instruct all U.S. representatives to the UN (including in New York and Geneva and U.S. diplomats at every UN agency) to wage diplomatic isolation campaigns against Iran, including by regularly introducing resolutions condemning Iran.
67. The U.S. should reject Iranian attempts to join the World Trade Organization (WTO) and any other international bodies of which it is not currently a member.
 - The U.S. State Department, U.S. Trade Representative, and other relevant actors should carefully monitor Iran's efforts to join the WTO. Iran has observer status in the WTO and has completed the first step toward accession, but its accession has been put on hold.⁹⁶ In April 2016, then Iranian Foreign Minister Mohammad Javad Zarif requested that the EU, which publicly supported Iran's WTO bid, pressure the United States to permit Iran's entry.⁹⁷ Nonetheless, the process has been paused until a chair is named for the Working Party on Iran's accession.⁹⁸
 - Iran seeks membership in the International Thermonuclear Experimental Reactor (ITER) project, which is working to develop the world's largest tokamak, an experimental device theoretically capable of conducting nuclear fusion to create a renewable, carbon-free energy source.⁹⁹ In October 2018, the United States reportedly used its seat on ITER's governing council to block Iran from joining.¹⁰⁰ It should continue to do so to prevent nuclear knowledge transfers.

95. United Nations Security Council, Resolution 2231, July 20, 2015 (https://www.iaea.org/sites/default/files/unsc_resolution2231-2015.pdf)

96. Vida Balikhani, "Will Trump Block Iran Bid to Join World Trade Organization?" *Atlantic Council*, January 17, 2017. (<http://www.atlanticcouncil.org/blogs/iraninsight/will-trump-block-iran-bid-to-join-world-trade-organization>)

97. "Iran seeks EU leverage to get financial concessions from U.S.," *Reuters*, April 16, 2016. (<https://www.reuters.com/article/us-iran-nuclear-usa/iran-seeks-eu-leverage-to-get-financial-concessions-from-u-s-idUSKCN0XD0E3>)

98. Office of the United States Trade Representative, "Other Accessions," accessed November 4, 2022. (<https://ustr.gov/trade-agreements/wto-multilateral-affairs/wto-accessions/other-accessions>)

99. "What is ITER?" *International Thermonuclear Experimental Reactor*, accessed November 4, 2022. (<https://www.iter.org/proj/inafewlines>)

100. Richard Stone, "United States blocks Iran from fusion megaproject," *Science*, October 14, 2022. (<https://www.science.org/content/article/united-states-blocks-iran-fusion-megaproject>)

68. The U.S. should pursue opportunities to suspend Iranian membership in international organizations wherever possible.
69. The U.S. should aggressively expose Iranian missile and other arms exports, particularly exports prohibited by UNSCRs 1701 and 2216 (transfers to Lebanon and Yemen, respectively).
70. The U.S. should spearhead passage of a UNSCR requiring all member states to counter the use of human shields. Even if such a resolution does not directly mention Iran and its proxies, it would create a powerful tool for countering the use of human shields by Iran as well as Hezbollah, Islamic Jihad, and other regime-backed groups.
71. The U.S. should press the International Atomic Energy Agency (IAEA) to request inspections of Iranian military sites and sites of the SPND (the Iranian Organization of Defensive Innovation and Research) where evidence suggests nuclear weapons-related research and development may be present.¹⁰¹ Such inspections should investigate centrifuge manufacturing activities at military or other locations and verify whether Iran is conducting activities that could contribute to the design and development of a nuclear explosive device.
72. The U.S. should push a resolution through the IAEA Board of Governors to find Iran in non-compliance with its obligations under the Nuclear Non-Proliferation Treaty for failing to declare nuclear material, sites, and activities and refer the matter to the UN Security Council.
73. If a UNSCR 2231 snapback is implemented, the U.S. should work with its allies to restore the UN Panel of Experts — which was established by UNSCR 1929 and would come back into force following snapback — to publish independent assessments of the regime’s nuclear and dual-use procurement efforts and UN member states’ compliance.



Rafael Grossi, Director General of the International Atomic Energy Agency (IAEA), speaks to journalists after the IAEA's Board of Governors meeting at the agency's headquarters in Vienna, Austria, on November 16, 2022. (Photo by Joe Klamar/AFP via Getty Images)

¹⁰¹ U.S. Department of the Treasury, Press Release, "Treasury Designates Entity Subordinate to Iran's Military Firm," December 3, 2020. (<https://home.treasury.gov/news/press-releases/sm1200>)



RECOMMENDATIONS

Department of Defense (DOD)

1. The U.S. should ensure that it has a credible military option for preventing Iranian acquisition of a nuclear bomb, including by ensuring that its military has the capacity to destroy the Iranian nuclear development program if necessary.
2. The U.S. must convince Iran that it is willing and able to use decisive military force to prevent the regime from developing nuclear weapons. The U.S. should be ready to implement military contingencies if deterrence fails.¹⁰²
3. The U.S. should convey to Tehran that any gains to Iran from attacks on U.S. forces and interests or from the development of a nuclear weapon would be outweighed by the costs. In conveying this message, Washington should reject any distinction between the actions of Tehran and the actions of its terrorist proxies.¹⁰³
4. The U.S. should ensure that its force structure in the region is sufficiently capable and postured to impact the regime's calculations across a wide variety of contingencies.¹⁰⁴
5. The U.S. should identify risks and develop plans to respond most effectively to specific steps Iran might take to destabilize the region, entrench and arm its proxy network, and increase the capability and lethality of its military. The objective of U.S. policy should be to preempt or impede regime aggression and to deter Tehran's use of direct or indirect forces.
6. The U.S. should help key partners in the region improve their ability to defend themselves from, and respond to, regime aggression and regime-backed aggression. A primary focus should be helping Israel build its capabilities to defend against attacks by Tehran's terror proxies and to conduct a protracted campaign to destroy the regime's nuclear program.
7. The U.S. should create — through military exercises, planning, and intelligence-sharing — the most unified and capable American-Israeli-Arab coalition possible to counter aggression from Tehran and its terrorist proxies.¹⁰⁵

102. Mark Dubowitz and Matthew Kroenig, "Biden's Moment of Truth in Iran," *The Wall Street Journal*, January 6, 2022. (<https://www.wsj.com/articles/bidens-moment-of-truth-in-iran-negotiations-deal-nuclear-warheads-proliferation-centrifuges-fissile-11641504610>)

103. Bradley Bowman, Joe Truzman, and Ryan Brobst, "To Stop Iran's Proxy Terrorists, Stop Iran," *Defense One*, February 22, 2022. (<https://www.defenseone.com/ideas/2022/02/stop-irans-proxy-terrorists-stop-iran/362248>)

104. Mark Dubowitz, Behnam Ben Taleblu, and Varsha Koduvayur, "Countering the Iranian Threat in the Persian Gulf," *Foundation for Defense of Democracies*, December 15, 2020. (<https://www.fdd.org/analysis/2020/12/15/defending-forward-countering-iranian-threat-in-the-persian-gulf>)

105. Bradley Bowman and Ryan Brobst, "Expand Israel-Arab-US military drills to counter Iran and its proxies," *Defense News*, November 12, 2021. (<https://www.defensenews.com/opinion/commentary/2021/11/12/expand-israel-arab-us-military-drills-to-counter-iran-and-its-proxies>)

Contingency Plans to Strengthen Deterrence

8. The Pentagon should develop and implement a detailed plan combining information operations and military actions to demonstrate to Tehran that attacks by its proxies in Syria and Iraq on U.S. forces and interests will be treated as attacks by Tehran itself.
9. Congress should ensure that the defense budget provides the Department of Defense (DOD) with adequate resources to: deter Iran from developing a nuclear weapon; rapidly execute military contingencies in the event deterrence fails; provide sufficient protection for U.S. personnel, bases, and embassies in the region; and project sufficient force to prompt Iran to de-escalate following a U.S. strike.
10. The U.S. should improve U.S. and partner intelligence, surveillance, reconnaissance, missile defense, strike, and force-protection capabilities throughout the region, identifying opportunities to work more closely with regional partners to create a common threat assessment and more effective combined responses.
11. Congress should require the DOD to identify ways to reduce the time between the planned delivery of each new major U.S. weapons system to Israel and the attainment of full operational capability. These methods could involve: 1) the allotment of training positions in U.S. schools; 2) the use of the Military Personnel Exchange Program to embed Israeli personnel in U.S. military units already employing a particular weapons system; 3) sending the weapons system to combined military exercises involving Israel; and 4) temporarily deploying U.S. units to Israel that possess the particular system to facilitate additional combined training. Sending U.S. units wielding certain systems to Israel for a few weeks or months prior to their delivery to Israel would provide the Pentagon an opportunity to hone dynamic force employment and the Air Force's agile combat employment.¹⁰⁶
12. The U.S. should identify specific incremental steps Iran might take toward a nuclear bomb and delivery system and plan for how to respond to each such step. The U.S. intelligence community should be tasked with conducting a red-team assessment of gaps in U.S. collection and other vulnerabilities in detecting weaponization work. It should also establish decision points for military action that correspond to conduct (e.g., production of weapons-grade uranium) where its confidence level for detecting indications and warnings is the highest.
13. The U.S. should expand the number of ground, air, and naval exercises that include the military forces of Israel, the United States, and Arab partners. The U.S. should seek to expand the complexity of these exercises over time to increase the readiness of the individual forces, their ability to operate together, and their deterrence against the Islamic Republic of Iran, including its terror proxies. The goal is to create the most unified and capable combined military coalition possible.¹⁰⁷
14. The U.S. should expand funding for "hunt forward operations" by U.S. Cyber Command and conduct missions with U.S. partners and allies in the region.¹⁰⁸ These hunt forward operations not

¹⁰⁶ Bradley Bowman and Enia Krivine, "Israel has a KC-46 problem. Here's the solution.," *Defense News*, April 21, 2022. (<https://www.defensenews.com/opinion/commentary/2022/04/21/israel-has-a-kc-46-problem-heres-the-solution/>); Bradley Bowman and Ryan Brobst, "Pentagon Announces Contract for Israeli KC-46s but Has More Work To Do," *Foundation for Defense of Democracies*, September 2, 2022. (<https://www.fdd.org/analysis/2022/09/02/pentagon-announces-contract-for-israeli-kc-46s>)

¹⁰⁷ Bradley Bowman and Ryan Brobst, "Expand Israel-Arab-US military drills to counter Iran and its proxies," *Defense News*, November 12, 2021. (<https://www.defensenews.com/opinion/commentary/2021/11/12/expand-israel-arab-us-military-drills-to-counter-iran-and-its-proxies>)

¹⁰⁸ Erica D. Loneragan and Mark Montgomery, "Defend Forward as a Whole-of-Nation Effort," *Lawfare*, March 11, 2020. (<https://www.lawfareblog.com/defend-forward-whole-nation-effort>); Mark Montgomery, "Equipping U.S. Partners in Cyberspace is a Must," *The Cipher Brief*, July 11, 2022. (<https://www.thecipherbrief.com/column/cyber-initiator/equipping-u-s-partners-in-cyberspace-is-a-must>)

only strengthen allied or partner networks' resilience against cyber threats, but also provide insights that inform the U.S. homeland defense.

Illicit Arms and Missile-related Transfers

15. DOD should develop overt and covert plans to stop illicit arms and missile-related transfers by air, land, and sea. It should do this in coordination with State Department and USUN efforts to address the regime's illicit arms and missile proliferation activities, including those prohibited by UNSCRs 1701 (arms transfers to Lebanon) and 2216 (arms transfers to Yemen). If a snapback pursuant to UNSCR 2231 is implemented, similar action should be taken to address such activities prohibited by all UNSCRs restored by triggering the snapback provision of 2231.¹⁰⁹
16. The U.S. should enhance intelligence-collection requirements, partnerships, and capabilities to detect Tehran's illicit procurement efforts that violate international and national laws. The U.S. should also work with local authorities in jurisdictions where shipments or transshipments are taking place to detect, deter, and prevent them.
17. The U.S. should, in order to oppose Tehran's weapons proliferation, fully resource existing multinational constructs such as Combined Task Forces 150-153.¹¹⁰ Partner capability increases combined deterrence while reducing the burden on the U.S. military over time.¹¹¹
18. The U.S. should expand and fully resource NAVCENT's Task Force 59, which can use unmanned assets to detect illicit maritime weapons transfers by the regime and other activities.¹¹²

Naval Activity

19. The U.S. should decisively address Iranian naval activity that threatens U.S. ships.
20. The U.S. should review current rules of engagement for dealing with unprofessional hostile Iranian naval activity to determine whether reforms are needed to better protect U.S. personnel and deter aggression.
21. The U.S. should expand NAVCENT's Task Force 59 while conveying to Tehran that there is no difference between attacks against manned and unmanned vessels owned or operated by the U.S. Navy.¹¹³

109. Bradley Bowman and Katherine Zimmerman, "Biden Can't Bring Peace to Yemen While Iran Keeps Sending Weapons," *Foreign Policy*, March 4, 2021. (<https://foreignpolicy.com/2021/03/04/biden-yemen-peace-saudi-arabia-houthis-iran-weapons>)

110. "CMF Establishes New Naval Task Force To Enhance Red Sea Security," *Naval News*, April 19, 2022. (<https://www.navalnews.com/naval-news/2022/04/cmf-establishes-new-naval-task-force-to-enhance-red-sea-security>)

111. Bradley Bowman, Ryan Brobst, and Mark Montgomery, "New Mideast task force can counter Iranian arms smuggling, but more capabilities are needed," *Foundation for Defense of Democracies*, May 9, 2022. (<https://www.fdd.org/analysis/2022/05/09/new-task-force-iranian-arms-smuggling>)

112. "U.S., Israeli Navies Conduct Exercise as Iran Steps up Maritime Aggression," *Foundation for Defense of Democracies*, September 30, 2022. (<https://www.fdd.org/analysis/2022/09/30/u-s-israeli-navies-conduct-exercise-as-iran-steps-up-maritime-aggression>); Roland Franklin, "U.S. 5th Fleet Launches New Task Force to Integrate Unmanned Systems," *U.S. Naval Forces Command*, September 9, 2021. (<https://www.cusnc.navy.mil/Media/News/Display/Article/2768468/us-5th-fleet-launches-new-task-force-to-integrate-unmanned-systems>)

113. Roland Franklin, "U.S. 5th Fleet Launches New Task Force to Integrate Unmanned Systems," *U.S. Naval Forces Command*, September 9, 2021. (<https://www.cusnc.navy.mil/Media/News/Display/Article/2768468/us-5th-fleet-launches-new-task-force-to-integrate-unmanned-systems>)

22. The U.S. should work with regional partners to increase the quantity and effectiveness of their patrols in and around critical chokepoints like the Strait of Hormuz and the Bab al-Mandeb.
23. The U.S. should increase the number of anti-piracy missions in which the U.S. Navy engages in the CENTCOM Area of Responsibility.
24. The U.S. should increase the number of exercises that simulate surface, aerial, and subsurface responses to attacks involving fast-attack craft and other vessels owned or operated by the IRGC Navy.

Counterproliferation

25. The U.S. should ensure that the defense intelligence community places high priority on, and has maximal capacity to detect, any Iranian illicit procurement for its weapons programs, including nuclear, missile, military, and other dual-use procurements from China, North Korea, or other countries.¹¹⁴
26. The U.S. must devote the intelligence resources necessary to fully understand the extent of the Iran-North Korea relationship, including cooperation on nuclear, ballistic and cruise missile, and conventional arms programs and any transfers of expertise, know-how, technology, equipment, and materials.¹¹⁵
27. The U.S. should increase intelligence cooperation and joint counterproliferation operations with partners, including Israel and the Gulf states, regarding Iran's nuclear and missile programs.¹¹⁶

Cyber

28. The U.S. should enhance offensive cyber operation plans to disable or disrupt critical nuclear weapons development infrastructure. It should conduct operational preparation of the environment to enable these plans.
29. The U.S. and its international partners have significant cyber capabilities that they should use to help Iranian protesters. These capabilities could be used to target the Iranian regime's command and control systems, security forces, and massive bureaucracy, whose information and communications move through cloud and other internet and intranet networks.
30. The U.S. should support labor strikes in Iran by using cyber capacities to disrupt the operations of key industries (e.g., the oil, gas, and financial sectors) and by creating a fund to provide financial support to laborers who go on strike. Oil strikes (coupled with market-supply and domestic-production issues) increased the power of protesters in the 1978-79 protests that toppled the monarchy in Iran.¹¹⁷

114. As described in: U.S. Defense Intelligence Agency, "Iran: Military Power," 2019. (https://www.dia.mil/Portals/110/Images/News/Military_Powers_Publications/Iran_Military_Power_LR.pdf)

115. Ibid.

116. Key fora for facilitating greater cooperation include the U.S.-GCC Working Groups on Integrated Air and Missile Defense and Maritime Security, the U.S.-GCC Iran Working Group, and the U.S.-Israel Strategic Consultative Group, as well as existing intelligence collaborations.

117. 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, *The 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)

**RECOMMENDATIONS****U.S. Agency for Global Media (USAGM)**

1. The U.S. should reestablish a medium-wave broadcasting capacity so that Iranians can listen to Radio Farda and VOA in their cars. Internet and television broadcasts can be blocked much more effectively than can medium-wave radio, which could be a cost-effective tool for the United States.
2. Networks of the U.S. Agency for Global Media, including Radio Free Europe's Radio Farda and Voice of America's Persian service, should have the resources and mission to provide comprehensive reporting and analysis of internal protests, turmoil, repression, corruption, and the regime's links to regional destabilization.
3. USAGM broadcast content for Iran should prioritize:
 - fact-checking statements made by regime officials and providing the Iranian people with information to counter propaganda;
 - reporting on the regime's illicit activities outside its borders, including in Syria and Yemen, and the amount of money these efforts are costing the Iranian people;
 - reporting on corruption inside the regime and the IRGC;
 - reporting on the hypocrisy of regime officials who preach hatred against the U.S. and the West but send their families to the U.S. or Europe for school, vacations, or long-term stays;
 - reporting on independent (non-regime affiliated) political prisoners and prisoners of conscience, including interviews with their families; and
 - reporting on pro-U.S., anti-regime figures inside Iran rather than on purported reformists tied to the Islamic Republic who are anti-U.S.
4. USAGM should enhance the management and content development of its services.
5. USAGM should more effectively counter regime efforts to block access to these services and their websites.



RECOMMENDATIONS

Department of Commerce

1. The U.S. should increase operations against Tehran's attempts to procure sensitive dual-use items. This includes preventing, deterring, and dismantling the regime's procurement networks.
2. The U.S. should ensure that it maintains an up-to-date list of key items that Iran's nuclear program, missile program, and defense industrial base are incapable of manufacturing and thus must import. The U.S. should also share this list with allies, partners, and businesses as appropriate and focus implementation efforts on it.¹¹⁸
3. The U.S. should more effectively encourage and assist relevant countries to implement their export control obligations relating to nuclear nonproliferation and missile technology, particularly vis-à-vis Iran.
4. The U.S. should identify and implement means to more effectively pressure China¹¹⁹ and other nations that divert U.S. and other Western technology to Iran, including by designating them as destinations of diversion concern.¹²⁰
5. The Commerce Department, Department of Homeland Security (DHS), and the FBI should vigorously implement the GAO's June 2022 recommendations, which specifically listed Iran as posing a risk of exploiting the open environment in U.S. academia to illicitly acquire and transfer sensitive technology.¹²¹

118. See, e.g., "Guidance on Actions Exporters Can Take to Prevent Illicit Diversion of Items to Support Iran's Nuclear Weapons or Ballistic Missile Programs," *U.S. Department of Commerce, Bureau of Industry and Security*, accessed November 4, 2022. (<https://www.bis.doc.gov/index.php/licensing/23-compliance-a-training/53-iran-web-guidance>)

119. Karen Freifeld, "US Accuses Chinese Company of Helping ZTE Hide Business with Iran," *Reuters*, August 9, 2022. (<https://www.reuters.com/business/media-telecom/us-accuses-chinese-company-helping-zte-hide-business-with-iran-commerce-dept-2022-08-09>); Andrea Stricker, "Proliferant States Continue to Rely on China for Nuclear-Related Equipment," *Foundation for Defense of Democracies*, July 2, 2020. (<https://www.fdd.org/analysis/2020/07/02/proliferant-states-rely-on-china>)

120. Orde Kittrie, "The China-Iran Nuclear Pipeline," *Foreign Affairs*, July 13, 2015. (<https://www.fdd.org/analysis/2015/07/13/the-china-iran-nuclear-pipeline>); Comprehensive Iran Sanctions, Accountability, and Divestment, 22 U.S.C. §8543. (<https://uscode.house.gov/view.xhtml?req=granuleid:USC-prelim-title22-section8543&num=0&edition=prelim>)

121. U.S. Government Accountability Office, "Enforcement Agencies Should Better Leverage Information to Target Efforts Involving U.S. Universities," June 2022. (<https://www.gao.gov/assets/gao-22-105727.pdf>)



RECOMMENDATIONS

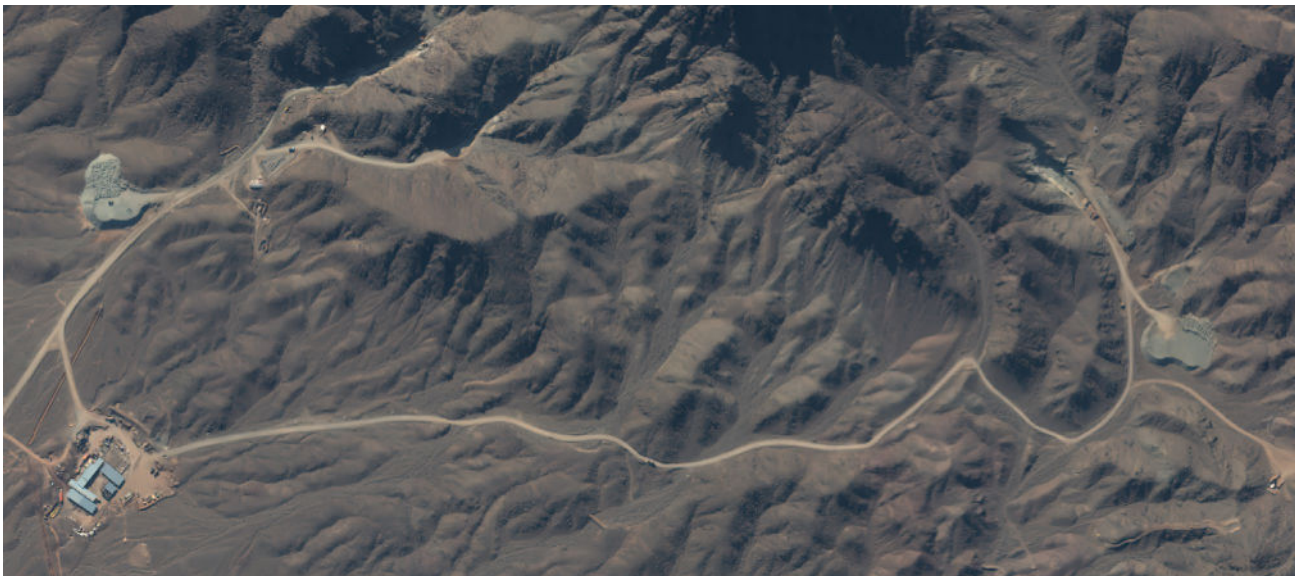
Department of Energy (DOE)

Intelligence Reporting on the Nuclear Program

1. The DOE should ensure that it is robustly reporting on and analyzing efforts by the regime to stockpile natural uranium or to expand and commercialize enrichment- and reprocessing-related programs.
2. The DOE should ensure that it is robustly reporting on and analyzing the regime's centrifuge research and development and heavy water work.
3. The DOE should ensure that it is robustly reporting on and analyzing "breakout timelines" for the regime's nuclear program, with key indicators and metrics to warn policymakers when the regime is shortening its timelines.

Oil Sanctions Implementation

4. The DOE should provide regular reporting to the NSC coordinator for oil sanctions implementation on the price implications of various sanctions options, the storage and spare capacity of key oil-producing partners, and the policy implications for U.S. producers.



An overview of the construction area related to the future underground centrifuge assembly facility in the mountainous area south of the Natanz uranium enrichment site in 2019. (Satellite image by Maxar Technologies via Getty Images)



RECOMMENDATIONS

Department of Homeland Security (DHS)

Borders and Threats From Abroad

1. The U.S. should strengthen Customs and Border Protection targeting systems at U.S. ports of entry and borders to identify and interdict potential terrorist threats associated with the regime and its proxies or partners.
2. The U.S. should strengthen Immigration and Customs Enforcement (ICE) interdiction efforts for persons of interest connected to the regime who are residing in the U.S. while awaiting immigration adjudication.
3. The U.S. should strengthen export control efforts, including through cooperation between the Commerce Department, DHS, and DOJ, to investigate and prevent U.S. export control violations involving sensitive technology sought by Iran and its proxies and partners.
4. The U.S. — and in particular the Commerce Department, DHS, DOJ, and the State Department — should work to strengthen ICE cooperation, coordination, and capacity-building with key countries such as the UAE and others that serve as transshipment routes to Iran.
5. The U.S. should strengthen inbound cargo screening and inspection to prevent the regime from smuggling weapons, especially through the U.S.-Mexico land border ports.
6. The U.S. should increase Coast Guard patrolling and interdiction of suspect vessels and persons in U.S. waters to deter and detect potential regime maritime smuggling operations.

Citizens and High-Value “Soft” and “Hard” Targets

7. The U.S. should prepare for Tehran to activate terrorist networks against Americans and American interests overseas and even inside the U.S. This should include providing relevant U.S. law enforcement and intelligence agencies with any necessary additional resources to address such threats.
8. The U.S. should increase threat-advisory, information-sharing, and coordination efforts among federal, state, local, and private sector officials responsible for protecting both “soft” and “hard” critical infrastructure and assets, including by raising the National Terrorism Advisory System threat levels when appropriate.
9. The U.S. should strengthen investigation and information-sharing efforts across key agencies, including the FBI, DHS, and state and local law enforcement. This includes the Transportation Security Administration expanding the presence of federal air marshals on domestic and international flights of interest and the DHS strengthening vetting and screening of domestic cargo shipments on passenger aircraft.

Cyberattacks

10. The U.S. should increase information-sharing with private industry by expediting declassification, where appropriate, and by developing a joint understanding of the threat landscape. To accomplish the latter, government and industry need a collaboration platform where operationally relevant data, including the federal government's threat information, can be queried and analyzed.¹²²
11. The U.S. should increase national cyber resilience to withstand cyberattacks from Iran and other U.S. adversaries. In addition to punishing Tehran for engaging in malicious cyber operations against the U.S. and its allies and partners, the U.S. government must work with the private sector and state, local, tribal, and territorial governments to increase cyber-defense capabilities.
12. The U.S. should implement the following recommendations of the Cyberspace Solarium Commission, which have not yet been acted upon:
 - establish a national risk management cycle to routinely exercise the identification, assessment, and prioritization of critical infrastructure risks;
 - develop and exercise continuity of the economy plans to rapidly recover from a widespread, significant cyberattack;¹²³
 - establish a National Cybersecurity Assistance Fund for programs that systemically increase the cyber resilience of U.S. public and private entities; and
 - designate U.S. entities and critical infrastructure that are systemically important to national security, national economic prosperity, and public health and safety; provide those entities with additional government support; and require those entities to shoulder elevated cybersecurity requirements.¹²⁴

122. Martin Matishak, "House defense policy bill would establish federal, industry collaboration program," *The Record*, June 21, 2022. (<https://therecord.media/house-defense-policy-bill-would-establish-federal-industry-collaboration-program>); Jim Langevin and Mark Montgomery, "Making the Joint Cyber Defense Collaborative Work," *Lawfare*, August 6, 2021. (<https://www.lawfareblog.com/making-joint-cyber-defense-collaborative-work>)

123. U.S. Cyberspace Solarium Commission, "Final Report," March 2020. (<https://cybersolarium.org/wp-content/uploads/2022/05/CSC-Final-Report.pdf>); Jiwon Ma and Mark Montgomery, "2022 Annual Report on Implementation," *Cyberspace Solarium Commission*, September 2022. (<https://www.fdd.org/analysis/2022/09/21/2022-csc-annual-report-on-implementation>)

124. Sarah Friedman, "Easterly: CISA plans to move forward with 'systemically important entities' work regardless of legislation," *Inside Cybersecurity*, October 13, 2022. (<https://insidecybersecurity.com/daily-news/easterly-cisa-plans-move-forward-%E2%80%98systemically-important-entities%E2%80%99-work-regardless>)



RECOMMENDATIONS

Department of Justice (DOJ)

Prosecution and Litigation

1. The U.S. should fully implement and enforce U.S. laws that provide criminal and civil penalties for material support of designated foreign terrorist organizations, including the IRGC.¹²⁵
2. The U.S. should facilitate the collection of the over \$53 billion in outstanding U.S. court judgments against Iran held by victims of Iran-sponsored terrorism.¹²⁶
3. The U.S. should facilitate additional lawsuits in U.S. courts against Iran by victims of Iran-sponsored terrorism.
4. The U.S. should expand the applicability of forfeiture and Racketeer Influenced and Corrupt Organizations (RICO) Act authorities to Iran sanctions evasion.
5. The U.S. should ensure that the DOJ and the SEC coordinate closely and effectively to prioritize Iran-related Foreign Corrupt Practices Act investigations and prosecutions.

Hezbollah

6. The U.S. should increase funding and other support for relevant Hezbollah investigations by the U.S. Drug Enforcement Administration (DEA).
7. The U.S. government should provide the DEA with the necessary resources, encouragement, and support to increase Hezbollah-related investigations in Latin America. That includes more than just funding; the White House should lean on Latin American governments to facilitate Hezbollah-related DEA operations in their territory and should expedite extradition requests.
8. The U.S. should pursue a more integrated bureaucratic approach — involving the DEA, FBI, Treasury's OFAC, and other agencies in the intelligence and policy communities — to ensure that Hezbollah-related investigations, indictments, sanctions, and designations are fully coordinated.

¹²⁵. Providing Material Support or Resources to Designated Foreign Terrorist Organizations, 18 U.S.C. §2339B. ([https://uscode.house.gov/view.xhtml?req=\(title:18%20section:2339B%20edition:prelim\)](https://uscode.house.gov/view.xhtml?req=(title:18%20section:2339B%20edition:prelim)))

¹²⁶. Orde Kittrie, "Iran Still Owes \$53 Billion in Unpaid U.S. Court Judgments to American Victims of Iranian Terrorism," *Foundation for Defense of Democracies*, May 6, 2016. (<https://www.fdd.org/analysis/2016/05/06/iran-still-owes-53-billion-in-unpaid-u-s-court-judgments-to-american-victims-of-iranian-terrorism>)

Sanctions Evasion and Proliferation Networks

9. The U.S. should increase investigations, indictments, and extraditions of persons involved in supplying the regime's nuclear, missile, or conventional weapons programs in violation of U.S. laws and sanctions.

Politically Motivated Iranian Detentions of Americans

10. The U.S. should utilize the RICO statute to target Iranian regime elements, particularly those associated with the politically motivated detention of Americans and others in Iran, through either civil or criminal action.

Cyberattacks

11. The U.S. should seek Interpol red notices against all indicted Iranian hackers and senior Iranian leaders who approve cyberattacks.
12. The U.S. should work with allies to arrest suspected Iranian hackers overseas or to lure them to the U.S. or other friendly nations where they can be arrested.
13. The U.S. should work with the private sector legal community to ensure that the necessary U.S. and partner country laws are in place to enable private businesses to sue for damages caused by Iranian and other foreign hackers. The U.S. should, when appropriate, cooperate with such private efforts by sharing evidence of the Iranian hackers' culpability.



A Department of Justice employee put up a poster of seven indicted hackers prior to a news conference announcing a law enforcement action March 24, 2016, in Washington, DC. (Photo by Alex Wong/Getty Images)



RECOMMENDATIONS

Department of Transportation (DOT)

Iran's Illicit Use of Aviation

1. The U.S. government, including the State Department, Department of Transportation (DOT), and the Treasury Department, should pressure foreign airport authorities to discourage them from allowing designated regime air carriers and officials to land.
2. The U.S. should encourage allies and partners to close their airspace to sanctioned regime aircraft (i.e., prohibit overflights).
3. The U.S. government, including the State Department, DOT, and the Treasury Department, should pressure foreign airport authorities to discourage them from allowing designated Venezuelan air carriers and officials to land. Conviasa (Venezuela's state-owned national airline) is on Treasury's SDN list.¹²⁷ It has benefited from aircraft transfers from the Iranian regime's sanctioned Mahan Air¹²⁸ and has been regularly flying between Caracas, Tehran, and Moscow. Disrupting these flights and seizing sanctioned aircraft will diminish Venezuela's ability to contribute to sanctions-evasion strategies by the Iranian regime and by Russia.
4. The U.S. should prepare seizure warrants against sanctioned regime aircraft in countries where those aircraft land.¹²⁹



A Mahan Air airplane on the tarmac at Dubai International Airport on September 14, 2017. (Photo by Giuseppe Cacace/AFP via Getty Images)

¹²⁷. Notice of OFAC Sanctions Actions, Office of Foreign Assets Control, Treasury, 85 Federal Register 69684, November 3, 2020, pages 69684–69687. (<https://www.federalregister.gov/documents/2020/11/03/2020-24354/notice-of-ofac-sanctions-actions>)

¹²⁸. Rainer Nieves Dolande, "Conviasa Takes Delivery of a Second Airbus A340-600 from Mahan Air and Programs Regular Flights to Iran," *Aviaciononline*, June 13, 2022. (<https://www.aviaciononline.com/2022/06/conviasa-takes-delivery-of-a-second-airbus-a340-600-from-mahan-air-and-programs-regular-flights-to-iran/>)

¹²⁹. U.S. Department of Justice, Press Release, "Justice Department Seeks Seizure of Boeing 747 Cargo Plane Grounded in Argentina," August 2, 2022. (<https://www.justice.gov/opa/pr/justice-department-seeks-seizure-boeing-747-cargo-plane-grounded-argentina>)

RECOMMENDATIONS

Interdepartmental Country-Specific Strategies

Syria

1. The U.S. should apply an intensive pressure strategy against the Assad regime to increase the cost to Iran of attempting to ensure the Assad regime's survival. This should include the U.S. working with partners to deny Iran a permanent military presence in Syria and to prevent advanced weapons from reaching Hezbollah.
2. The U.S., in order to disrupt each of the main sources of revenue for the Assad regime, should:
 - lead a multinational diplomatic and law enforcement campaign to disrupt the Assad's regime's narco-trafficking, which is a major source of revenue;
 - disrupt the shipment of crude oil from Iran to Syria, which is in violation of sanctions on Damascus;
 - work with allies to prevent the regime's large-scale diversion of UN humanitarian aid, which has deprived civilians of hundreds of millions of dollars in assistance;
 - create channels for the Syrian diaspora to send remittances home while bypassing official banks that charge confiscatory exchange rates and fees;
 - vigorously enforce the Caesar Syria Civilian Protection Act and all other sanctions on the Assad regime, its patrons, and its partners, including by:
 - informing the governments of Egypt, Jordan, and Lebanon that their gas and electric power deals with the Assad regime violate the Caesar Act;
 - targeting Assad's financiers and their front companies, not just security force officials who commit human rights abuses but have no economic role;
 - warning Arab Gulf states that the U.S. will fully enforce the Caesar Act if Gulf investors or firms breach it;
 - and pressuring Beirut to create mechanisms to prevent it from becoming a haven once again for illicit Syrian transactions.¹³⁰
3. The U.S. should maintain or increase the U.S. military presence in northeast Syria and at the al-Tanf garrison (the suppression of ISIS is the primary mission of coalition forces, yet their presence can deter undesirable action by Iran, Assad, and their partners).¹³¹
4. The U.S. should deter or defeat incursions by Iran-aligned forces across the Euphrates River deconfliction line, and in the event of incursions, respond with decisive force, as the U.S. military did during the February 2018 clash near the Conoco gas field.

¹³⁰. Caesar Syria Civilian Protection, Pub. L. 116–92, 133 Stat. 2291, 22 U.S.C. §§8791. (https://home.treasury.gov/system/files/126/caesar_act.pdf)

¹³¹. David Adesnik and Robert Green, "America's Small but Effective Presence in Syria," *Foundation for Defense of Democracies*, December 15, 2020. (<https://www.fdd.org/analysis/2020/12/15/defending-forward-americas-small-but-effective-presence-in-syria>)

5. The U.S. should counter the efforts of Iran, Assad, and their partners to threaten Syrians living in the coalition's area of operations.
6. The U.S. should deter additional Turkish military intervention in northeast Syria (Iran, Assad, and their partners benefit from the instability Ankara causes).
7. The U.S. should pursue a diplomatic resolution of Turkish concerns about activity in Syria by the Kurdistan Workers Party (PKK), a U.S.-designated terrorist organization.
8. To support Israeli efforts to prevent Iran from exploiting Syria as a conduit for transferring weapons to Hezbollah or as a launchpad for future aggression against Israel, the U.S. should:
 - oppose any permanent Iranian military presence in Syria, including proxy forces;
 - communicate public U.S. approval of Israeli operations to degrade or destroy Iranian military facilities in Syria or shipments of weapons in Syrian territory;
 - employ sufficient intelligence, surveillance, and reconnaissance (ISR) capabilities to support Israeli operations targeting Iranian military assets in Syria;
 - assess Israel's potential needs for additional munitions and other materiel in the event of escalation (partial public disclosure may enhance deterrence); and
 - communicate to Russia that the U.S. expects Moscow not to interfere with Israeli operations targeting regime assets and not to facilitate Tehran's entrenchment.

Iraq

9. The U.S. should increase the capability of the Iraqi security forces as a means of keeping pressure on ISIS, while helping Baghdad reduce the relative power of Shiite militias that operate at the behest of Tehran and undermine Iraq's sovereignty. As a hedging strategy, the U.S. should continue to maintain the strongest feasible security ties with the Kurdish Peshmerga but should seek to do so in ways that minimize tension with Baghdad.

Yemen

10. The U.S. should reinstate the designation of the Houthis as a foreign terrorist organization.
11. The U.S. should work with Saudi Arabia, Egypt, the UAE, and Israel, including within the context of Combined Task Force 153, to counter efforts by Iran to smuggle weapons to the Houthis.¹³²
12. The DOD should work with the State Department to expeditiously meet Saudi and Emirati military requirements related to air and missile defense, as well as naval surveillance and interdiction.
13. The U.S. should work to explain to relevant publics and governments the commonalities between Hamas, Hezbollah, and the Houthis as a means to build American, Israeli, and Arab consensus and combined action related to Tehran's terror proxy network.¹³³
14. The U.S. and its allies should pressure the Houthis to abandon their alliance with Iran, just as the Saudis and Emiratis pressured Sudan to weaken its alliance with Iran in 2016.¹³⁴

¹³². NAVCENT Public Affairs, "New International Naval Task Force to Enhance Red Sea Security," *U.S. Naval Forces Central Command*, April 17, 2022. (<https://www.cusnc.navy.mil/Media/News/Display/Article/3001660/new-international-naval-task-force-to-enhance-red-sea-security>)

¹³³. Ibid.

¹³⁴. Eyal Zamir, "Countering Iran's Regional Strategy," *The Washington Institute for Near East Policy*, May 8, 2022. (<https://www.washingtoninstitute.org/policy-analysis/countering-irans-regional-strategy-long-term-comprehensive-approach>)

Palestinian Territories

15. The U.S. should increase intelligence cooperation and naval interdiction cooperation with the Israelis to stop the flow of weapons to Hamas and Islamic Jihad in Gaza.
16. The U.S. should request that Egypt increase its naval presence where sea routes are used to smuggle weapons to Palestinian militant organizations.
17. The U.S. should leverage DOD relationships in Cairo to increase pressure on Egypt to interdict smuggling of weapons and related materials bound for Gaza, including by identifying and destroying tunnels.
18. The U.S. should incentivize the Palestinian Authority (PA) security forces to retake areas where they have lost control to other Palestinian groups, and, when appropriate, hold them directly responsible for violence against Israeli civilians.
19. The U.S. should prioritize areas where additional cooperation between Israel and the PA could benefit both parties and should be implemented.

Lebanon

20. The U.S. should formally assess whether the assumptions regarding U.S. security cooperation with the Lebanese Armed Forces (LAF) remain valid, including the idea that support for the LAF provides a counterweight to Tehran's and Hezbollah's influence in Lebanon.¹³⁵
21. The U.S. should formally assess the degree to which Hezbollah and the LAF coordinate and cooperate with one another and the impact this should have on U.S. security cooperation with the LAF.
22. The U.S. should examine whether Hezbollah's role in the Lebanese government makes LAF-Hezbollah cooperation a structural feature of the Lebanese political order, which would negate the fundamental premise of U.S. security assistance to the LAF, which posits a distinction between Hezbollah and the government.
23. The U.S. should ask the Government Accountability Office (GAO) to review whether U.S. assistance to the LAF has accomplished the explicit objectives delineated in U.S. law and whether the U.S. government has the means to credibly make the certifications required by law related to U.S. security assistance in Lebanon.
24. The U.S. should task the Defense Intelligence Agency with reporting on Hezbollah's arsenal of PGMs and ask the administration for an update on efforts to stop the growth of this arsenal and to work with Israel to prepare for Hezbollah's potential employment of PGMs.

Bahrain and Oman

25. The U.S. should increase naval interdictions of suspected regime smuggling into Bahrain and increase counter-intelligence cooperation with the Bahraini government. The U.S. should make clear to Muscat that the U.S. military will consider destroying IRGC supply routes, including in the Gulf of Oman, as necessary to stem the flow of weapons to the Houthis. The U.S. should also insist that Muscat dismantle the Houthi headquarters in Oman.¹³⁶

135. David Kilcullen, "Missing the Mark," *Foundation for Defense of Democracies*, July 26, 2022. (<https://www.fdd.org/analysis/2022/07/26/missing-the-mark>)

136. Michael Rubin and Jonathan Schanzer, "Oman Must Isolate, Not Embrace, the Houthis," *The National Interest*, January 22, 2022. (<https://nationalinterest.org/feature/oman-must-isolate-not-embrace-houthis-199778>)

Conclusion

The Biden administration has a historic opportunity to constrain, deter, and, over time, reverse the Islamic Republic of Iran's capacity and will to threaten the United States, our allies and interests, and the Iranian people. This should include a presidential directive to help achieve President Biden's stated objective of a "free Iran."¹³⁷ Ronald Reagan showed how this can be done against a much more formidable and dangerous regime when he directed American power against the Soviet Union. These recommendations provide a road map for achieving that objective against the Islamic Republic of Iran.

137. Aamer Madhani, "Biden says 'we're gonna free Iran' as protests there go on," *Associated Press*, November 4, 2022. (<https://apnews.com/article/iran-biden-middle-east-government-and-politics-22e7f6e5546a94941d20f41784314f59>)

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