

MAXIMUM SUPPORT

A THIRD WAY FOR IRAN POLICY

NUFDI
NATIONAL UNION FOR DEMOCRACY IN IRAN

MARCH 2023


BE OUR VOICE
#MahsaAmini
WOMAN LIFE
I STAND WITH THE WOMEN
WOMEN
LIFE
WE STAND WITH THE WOMEN OF IRAN

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For decades, U.S.-Iran policy has focused almost exclusively on the Islamic Republic—whether and how to engage it, contain it, or pressure it.

At NUFDI, we believe that it is time for a strategic expansion of U.S.-Iran policy to account for the Iranian people and their historic role in the developing transformation of the political reality in Iran.

THE ISLAMIC REPUBLIC IN NUMBERS

AT LEAST
3,156
REGIME-LINKED MUNITIONS LAUNCHES against U.S. personnel, partners and interests since 2011

AT LEAST
26,242
IRANIANS MURDERED by the Islamic Republic in various forms of state violence

OVER
$100M
IN FUNDING given to terrorist organizations annually

MORE THAN
1.08M
CHILD "MARRIAGES" in Iran in the last 8 years

AN ESTIMATED
30,000
IRANIANS DIE ANNUALLY DUE TO COMPLICATIONS FROM AIR POLLUTION caused by the regime's industrial mismanagement

OVER
16M
IRANIANS HAVE HAD TO LEAVE THE COUNTRYSIDE due to water shortages brought on by regime mismanagement of environmental resources

OVER
18,000
PRO-DEMOCRACY PROTESTERS JAILED since the murder of Mahsa Jhina Amini

AN ESTIMATED
$95B
TAKEN FROM THE IRANIAN PEOPLE through the Islamic Republic's seizing of businesses & property

70%
OF THE ECONOMY REMAINS STATE-CONTROLLED

Maximum Support is designed to offer policymakers strategic tools for the provision of maximum support to the people of Iran. As a complement to the policy of Maximum Pressure, Maximum Support holds the promise of creating a more complete framework for U.S.-Iran policy—one that continues to hold the Islamic Republic accountable through economic and diplomatic isolation but also engages, elevates, and empowers the Iranian people—the true sovereigns of Iran—through the provision of much-needed moral, logistical, and financial support.

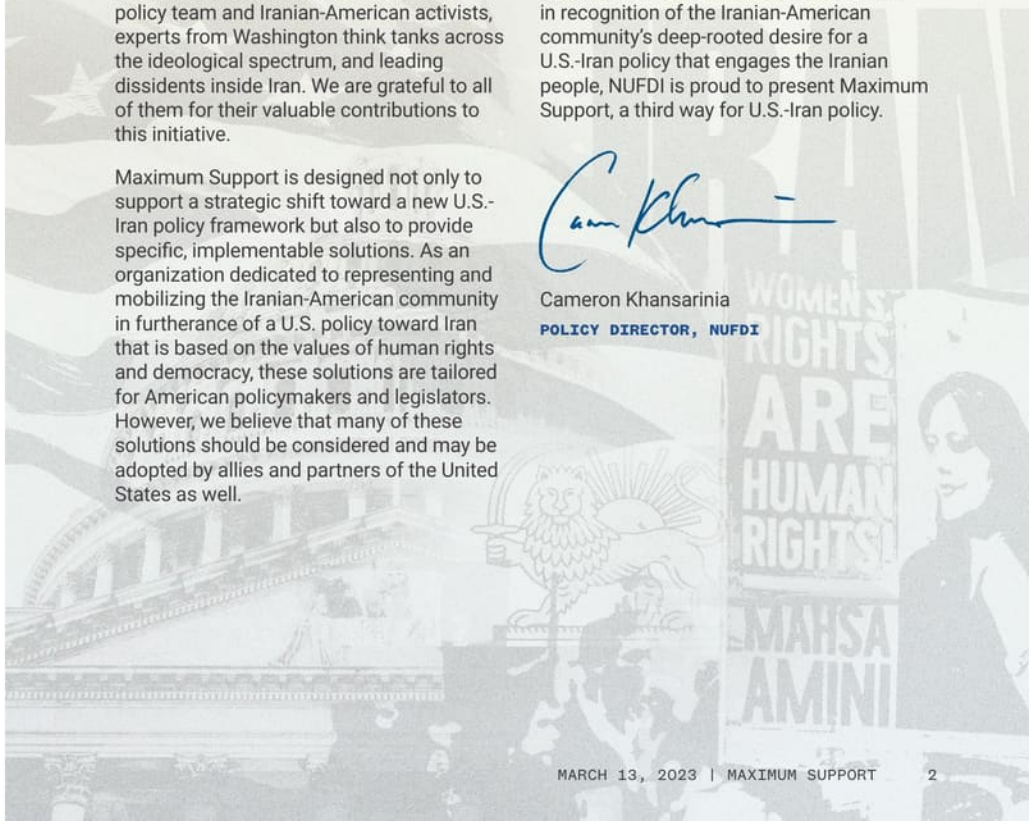
Maximum Support was developed over months of dialogue between the NUFDI policy team and Iranian-American activists, experts from Washington think tanks across the ideological spectrum, and leading dissidents inside Iran. We are grateful to all of them for their valuable contributions to this initiative.

Maximum Support is designed not only to support a strategic shift toward a new U.S.-Iran policy framework but also to provide specific, implementable solutions. As an organization dedicated to representing and mobilizing the Iranian-American community in furtherance of a U.S. policy toward Iran that is based on the values of human rights and democracy, these solutions are tailored for American policymakers and legislators. However, we believe that many of these solutions should be considered and may be adopted by allies and partners of the United States as well.

With increasing numbers of Americans concerned about the United States' commitments abroad, Maximum Support has been calibrated to promote efficiency and to minimize burden on the American taxpayer. For example, by drawing funding, where needed, from regime-owned frozen assets. We believe, however, that any investment in the Iranian people is an investment that advances U.S. national security, foreign policy, and economic interests, and one that honors America's moral responsibility and values as a beacon for hope and democracy.

In light of the Iranian people's ongoing struggle for freedom and democracy, and in recognition of the Iranian-American community's deep-rooted desire for a U.S.-Iran policy that engages the Iranian people, NUFDI is proud to present Maximum Support, a third way for U.S.-Iran policy.

Cameron Khansarinia
POLICY DIRECTOR, NUFDI



Pressure on the Islamic Republic is both a strategic necessity and a moral imperative. Yet pressure on its own is insufficient to satisfy America's national security, foreign policy, and economic interests and to address its moral responsibility and values. Maximum Support is the strategic complement to Maximum Pressure and the two, together, offer a comprehensive U.S.-Iran policy framework.

The two strategies work hand-in-hand. Maximum Pressure on the Islamic Republic is one form of supporting the Iranian people, as weakening the regime effectively strengthens the Iranian people relative to their oppressors. Likewise, Maximum Support of the Iranian people is a form of pressuring the regime, as it strengthens and empowers the people, effectively weakening the regime in the face of a growing democratic movement.



ANNOUNCE STRATEGIC POLICY SHIFT

Maximum support for the Iranian people necessitates a publicly-declared, strategic realignment of U.S.-Iran policy.

In the wake of the ongoing revolution and pro-democracy movement in Iran, it should be U.S. policy to support the democratic rights and aspirations of the people of Iran.

U.S. policy should be clear: to support the Iranian nation's right to have a secular democracy, in whatever form it decides.

01

Executive Action

Office of the President/ State Department	• Announce a formal end to the JCPOA negotiations • Publicly refer to the Islamic Republic as an "illegitimate regime" in official administration communications • Share a vision for restored relations with a free Iran and of the opportunities for economic, cultural, and social exchanges between the American and Iranian peoples
Office of the President	• A primetime speech by the President announcing the strategic policy shift and supporting the Iranian people's democratic movement
State Department	• End all high-level engagement with Islamic Republic officials and urge European allies to take similar measures • Reconstitute the Iran Action Group, including with outside, non-career hires, as an active part of Iran policy formation CLICK HERE FOR MORE INFORMATION OR SCAN QR CODE • Create the position of coordinator for human rights and democracy as a deputy to report directly to a Special Envoy for Iran

DO NO HARM

Just as Maximum Support necessitates reducing engagement with the current regime in Iran to a bare minimum, so it also requires refraining from any action that would undermine the relationship between the United States and the Iranian people.

The people of Iran must be told, unequivocally, that it is American policy to respect Iran's territorial integrity as a matter of international law.

Furthermore, it should be made clear that it is American policy not to engage or support armed or formerly-listed terrorist organizations.

Terrorist organizations and separatist groups may be enemies of the Islamic Republic, but they are no friends of the United States or the people of Iran.

02

Executive Action

State Department

- Do not engage groups that do not accept Iran's territorial integrity and national unity
- Do not engage armed, insurgent groups and those groups formerly listed as terrorist organizations

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- Encourage America's allies, especially those in the Middle East, to follow suit

Congressional Action

- Do not support pieces of legislation or resolutions that promote formerly-listed terrorist groups or those with track records of anti-American activity, including killing American soldiers
- Do not support legislation or resolutions that promote or pre-determine the post-Islamic Republic government of Iran
- Do not engage with representatives of such groups

HIGHLIGHT HUMAN RIGHTS ABUSES

While Iranians are all-too-familiar with the Islamic Republic's decades-long record of human rights abuses and crimes against humanity, the regime's brutality has often gone ignored or under-reported outside of Iran. Many Iranians feel that they suffer most and face the worst treatment under the cover of silence.

Such reporting of abuses by the United States is a significant policy tool both to empower victims and to show the regime that its crimes will carry international political and economic costs. Such documentation will also serve as a valuable resource for a post-Islamic Republic truth and reconciliation process.

In addition to reporting human rights abuses, reports should highlight the bravery of Iranian dissidents and civil society in standing up to the regime's violence.

03

Executive Action

State Department

- Open a portal for Iranians and NGOs to submit reports of human rights abuses

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- Hold regular meetings with Iranian human rights groups and submit regular reports to the Treasury Department to sanction confirmed human rights abusers
- Share this information with American allies to better facilitate multilateral human rights sanctions

Treasury Department

- Take into account and assess information from the State Department and from Iranian-Americans and human rights organizations relating to human rights abusers for new sanction designations

Congressional Action

- Relevant committees should host Iranian dissidents and survivors of the regime's crimes for formal Congressional hearings

HOLD REGIME LEADERSHIP ACCOUNTABLE

During the more than four decades of the Islamic Republic's dictatorship, the Iranian people have suffered the indignity of a near total lack of accountability for the crimes committed against them.

This lack of accountability has magnified the suffering they have faced and has left many victims feeling hopeless for obtaining justice.

Therefore, in addition to documenting the crimes they have faced, holding the Iranian peoples' oppressors accountable is a necessary component of Maximum Support.

04

Executive Action

State Department/ Justice Department	• Coordinate with U.S. allies to ensure the execution of Interpol Red Notices on high-ranking regime officials
State Department	• Coordinate with allies to implement and enforce multilateral sanctions on Ali Khamenei and other high-ranking regime officials • Urge allies to designate the IRGC as a terrorist organization
Justice Department	• Place Ali Khamenei and other high-ranking regime officials on "Most Wanted" lists of federal agencies

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Congressional Action

	• Co-sponsor the bipartisan MAHSA Act to sanction Ali Khamenei and Ebrahim Raisi for human rights violations and terrorism

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OFFER INTERNET & COMMUNICATIONS SOLUTIONS

Ensuring the Iranian people's ability to connect to one another and to the outside world through the provision of Internet and communications solutions is not only an important form of support for Iranians, but also a meaningful example of America's commitment to its first and most precious value: freedom of speech, expression, and assembly.

05

Executive Action

State Department/ Treasury Department	• Identify and sanction companies providing hardware, software, and other technologies to the Islamic Republic that are used to facilitate human rights abuses against Iranians including monitoring, tracking, and targeting protesters, dissidents, and everyday citizens
State Department	• Revoke waivers with respect to dealings with the Islamic Republic of Iran Broadcasting (IRIB) under the Iran Freedom and Counter-Proliferation Act of 2012, and enforce existing sanctions • Impose new sanctions on the IRIB and the affiliates of the IRIB for their role in human rights violations, including the broadcasting of forced confessions • Work with American technology companies (specifically mobile phone operating systems) to remove regime-affiliated applications which often collect information on Iranian protesters and dissidents
Treasury Department	• Continue to expand and communicate the scope of General Licenses for the provision of communications-related tools and services for Iranian users

Congressional Action

	• Advance a Bipartisan Congressional Mandate to provide Internet access and censorship circumvention resources for Iranian users, including VPN tools and satellite-based broadband Internet connectivity solutions to Iran

REDIRECT IRAN'S NATIONAL RESOURCES TO THE IRANIAN PEOPLE

The more than one million barrels of oil it exports per day continues to be the Islamic Republic's lifeline.

The revenues from such exports are not used to benefit the Iranian people and are instead used to fund the Islamic Republic's brutal repressive apparatus and embezzlement by corrupt regime officials and affiliates.

06

Executive Action

State Department/ Justice Department

- Seize tankers transporting sanctioned oil and sell the product at market price with funds going to a new special-purpose fund that could allocate proceeds for several authorized purposes, including to:
  - Support striking Iranian workers
  - Support the families of political prisoners and other regime victims
- Create and announce a fund for Iran's economic redevelopment with assets to be held in escrow for the Iranian people to rebuild after the fall of Islamic Republic

State Department/ Treasury Department

- Distribute the additional billions of dollars in frozen Iranian assets to the Iran redevelopment fund and to the fund to support Iranian strikers and the families of regime victims

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Congressional Action

- Pursue monthly reporting on the Islamic Republic's oil sales in violation of existing sanctions, and pressure the administration to enforce said sanctions
- Reintroduce the bipartisan Holding Iranian Leaders Accountable Act, which includes a review of financial institutions' ties to regime officials and assets

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ISOLATE THE REGIME INTERNATIONALLY

The Islamic Republic has maintained a semblance of international legitimacy with its presence in international fora and through the engagement of its diplomatic corps abroad.

However, the regime's so-called diplomats do not engage in diplomacy on behalf of the people of Iran. Instead, they act as agents for the dictatorship, disseminating propaganda, engaging in espionage, and organizing acts of terrorism around the world.

To support the Iranian people, U.S. policy should include a commitment to the diplomatic isolation of the Islamic Republic on the world stage.

07

Executive Action

State Department

- Work with allies to remove the Islamic Republic from international fora

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- Reinstitute travel restrictions for Islamic Republic officials attending the United Nations General Assembly (UNGA)
- Urge European allies to expel the Islamic Republic's ambassadors and to recall their own ambassadors from Tehran (downgrading diplomatic relations while maintaining consular services)
- Encourage American diplomats at the United Nations and other international fora to walk out of sessions when regime officials are speaking and urge allies to do the same
- Work with allies to establish a previously-suggested "no-go zone" for human rights violators and their families by imposing visa-bans on those on the Treasury Department's SDN list
- Lobby for Islamic Republic flags and anthems to be banned from international competitions while allowing Iranian competitors to participate under international flags or banners instead of representing the regime

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PLACE MEANINGFUL LIMITATIONS ON REGIME OFFICIALS' AFFILIATES

The Islamic Republic has placed draconian restrictions on the people of Iran for more than four decades.

While the totalitarian regime has attempted to control every aspect of the Iranian people's lives and enforce the most archaic form of Islamist law, its high-ranking officials and their affiliates often live lives of luxury abroad.

Supporting the Iranian people should thus include preventing those living off of their plundered wealth from living comfortably in the United States.

08

Executive Action

Office of the President/ State Department

- Urge allies to prevent the sale of "golden visas" to regime officials and their affiliates
- Ensure ease of travel to the United States for those unaffiliated with the regime, especially dissidents fleeing the Islamic Republic and seeking political asylum

Treasury Department/ Justice Department

- Work with allies to form an international task force to track and seize the assets of these sanctioned individuals and their affiliates modeled after the Russian Elites, Proxies, and Offspring (REPO) Task Force

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- Track the family members of Islamic Republic officials who work or study in the United States or allied countries and, where legally permitted, identify and publicize the sources of their overseas wealth

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Congressional Action

- Support the REGIME act, which includes a full State Department review of regime affiliates with U.S. visas

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PROVIDE CYBER & INTELLIGENCE SUPPORT

The Iranian people have long been denied the right to transparency from their government. A policy of Maximum Support should thus include offering the Iranian people maximum transparency into their government, its officials, and their actions.

09

Executive Action

National Security Council/ Intelligence Agencies

- Use American intelligence and cyber capabilities (coordinated with regional allies) to expose the corruption, crimes, and other misdeeds of the Islamic Republic and its high-ranking officials
- Use cyber and intelligence capabilities (coordinated with regional allies) to take IRGC and other suppressive forces' communications off-line in order to even the playing field when protesters are in the streets
- Use intelligence (including that gained from allies) to share information about the regime's deployment of security forces with protesters and the Iranian public
- Encourage high-ranking regime officials to defect from the regime and engage with the mainstream, secular, democratic opposition to absorb these defections

DEVELOP CLEAR COMMUNICATIONS & MESSAGING

As part of a strategic policy shift to support the Iranian people, the United States must adopt a consistent and coordinated communications and messaging approach to engage the Iranian people and address the current regime.

Messaging to the Iranian people should reinforce the strategic policy shift to one of overt support for their democratic aspirations and should be reinforced across multiple levels of government.

10

Executive Action

State Department

- Hire a Persian-language Communications Director (under a Special Envoy for Iran) with experience in pro-democracy activism to speak directly to the Iranian people and discuss U.S. government policies and initiatives in Persian language media
- Use evidence of the Islamic Republic's terrorism and human rights abuses to reflect—in both Persian and English—the illegitimacy of the regime in Iran.
- Speak regularly about the potential for a democratic Iran, including restored relations with the United States and the West
- Reinforce, consistently and unequivocally, American support for the people of Iran and their movement for secular democracy
- Reinstitute the use of "Captive Nations Week" highlighting the Iranian people as hostages of the Islamic Republic

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- Reinvigorate USABehFarsi with up-to-date information and support for the Iranian people including:

  Monthly report of human rights abuses

  Monthly "bravery report" highlighting the courage of Iranian dissidents and protesters

ENGAGE THE SECULAR, DEMOCRATIC OPPOSITION

Maximum Support should be based on the right of the people of Iran to determine their own political fate, both as it relates to the current regime and the future political order.

U.S. policy should not be to make—or to give the impression of making—decisions for the Iranian people, and should emphasize that the form of the future Iranian government should be determined only by the people of Iran in a free and fair referendum.

Toward that end, the United States should engage leading elements of the secular, democratic opposition to the Islamic Republic.

11

Executive Action

State Department/ USAID	• Emphasize or assist capacity building with pro-democracy NGOs, activists, and dissidents
State Department/ National Security Council	• Begin post-transition strategic planning in order to support a democratic transition in Iran
State Department	• Provide training for Iranian secular, democratic groups and parties to facilitate the transition to a liberal democracy in Iran

Executive & Congressional Action

	• Conduct high level engagement with popular leaders of the secular, democratic opposition

ENGAGE THE IRANIAN-AMERICAN COMMUNITY

The Iranian-American community is a remarkable resource for the United States. It can also play a critical role in the redevelopment and rebuilding of a democratic Iran—economically, politically, and socially.

Iranian-Americans, in the current phase, are also the most natural forces to echo the demands and desires of those in Iran given the overlap of values between the American people and the Iranian people.

12

Executive Action

Office of the President

- Host a Norooz gathering at the White House celebrating the prospect of a free Iran and restored U.S.-Iran relations

State Department

- Host roundtables with the Iranian-American community across the country to inform U.S. policy on Iran



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- Use the shuttered Iranian embassy in Washington, D.C. and other buildings belonging to the Iranian people for events for the Iranian-American community focused on the future of a free, democratic Iran. Thereafter, rent these facilities to pro-democracy organizations



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- Promote efforts within the Iranian-American community to help rebuild Iran economically after the transition to secular democracy

REFORM U.S. MEDIA & BROADCASTING

Among the primary messaging resources at the U.S. government's disposal are the Persian language media outlets VOA Persian and Radio Farda.

Regrettably, despite some improvements in recent years, each remains significantly behind their private sector counterparts in terms of penetration inside Iran.

These existing media outlets afford unique opportunities for the United States to speak directly to the Iranian people and support their democratic aspirations with relevant, timely programming.

13

Executive Action

United States Agency for Global Media (USAGM)

- Create a new, condensed media resource, the "Office of Iran Broadcasting", by merging VOA Persian and Radio Farda. This would streamline Persian-language media resources, talent, and efforts

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- Use the resources of the U.S. government, including access to high-profile political leaders, information about regime officials from U.S. intelligence, and others to produce exclusive, interest-generating content in the Persian language media market
- Include cost-efficient, medium wave radio signals for RadioFarda to allow greater ease of access and penetration inside Iran
- Encourage the development of programming focused on the potential of a democratic Iran and restored U.S.-Iran relations

REVIEW & REVITALIZE STATE DEPARTMENT IRAN FUNDING

The State Department currently provides millions of dollars to Iran-focused projects. Regrettably, the funding has sometimes been diverted from its original purpose of democracy-promotion.

Activists fear that some of the funding is being wasted on make-work projects and others which are focused on promoting certain political ideologies instead of human rights and democracy.

These investments can be better calibrated to advance U.S. foreign policy interests vis-a-vis Iran as well as to support the Iranian people's democratic aspirations.

14

Congressional Action

- Request a full audit and impact analysis of the current State Department Iran funding. This should be conducted in collaboration with respected Iranian-American human rights experts and activists
- Establish stronger guidelines for the grant process including seeking out and supporting projects that expressly support human rights and democracy in Iran and that are aligned with the aspirations of the Iranian people

INVESTIGATE REGIME INFLUENCE OPERATIONS IN THE U.S.

The Islamic Republic has been reasonably successful at promoting a more favorable image of itself abroad.

Often, this has been conducted by a network of individuals sympathetic to the regime. Much of this influence—which should still be strongly discouraged and exposed—is likely conducted legally. However, any potential illegal influence that the regime conducts in the United States should come under the highest level of scrutiny.

15

Executive Action

Justice Department

- Investigate the Islamic Republic's influence of and infiltration into American higher education

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- Investigate any regime connections to American NGOs, non-profits, and institutions

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State Department

- Close the Islamic Republic's Interest Section in Washington, D.C.

Congressional Action

- Write to the Attorney General calling for investigations into the regime's influence operations in the United States
- Deny funding to institutions of higher education that maintain relationships with institutions deemed to be influence operations of the Islamic Republic

NUFDI
NATIONAL UNION FOR DEMOCRACY IN IRAN

NUFDI is a non-profit, non-partisan organization made up of Iranian-Americans of diverse backgrounds who closely follow events in their mother country of Iran.

Those events are defined by the Iranian people's ongoing struggle to reclaim Iran from the Islamic Republic and establish freedom, human rights, and democracy in Iran.

We view it as our mission to give a voice to the Iranian people's demands for the same rights that we enjoy as Americans.

The Iranian people's movement calls for free and fair elections; separation of church and state; equal protection under the law; non-discrimination on the basis of gender, religion, sexual orientation, or social status; an independent judiciary and due process; freedom of speech, assembly, and religion; and economic development, opportunity, and prosperity for all Iranians.

It seeks to reestablish peaceful, friendly relations with Iran's neighbors and to have Iran re-engage the community of nations in a manner befitting its rich culture and heritage as a great civilization. It rejects the regressive notion of Balkanization as a political solution. And it believes that the transition to a secular democratic system must be brought about through civil disobedience and other forms of nonviolent resistance, as advocated for many years by Prince Reza Pahlavi, a consistent and vocal supporter of this movement, and now echoed by many of the most prominent Iranian and Iranian-American political figures, activists, scholars, artists, athletes and other voices. These are the values we have come to cherish as American citizens, and they are the same values that the people of Iran seek for their own country.

NUFDI strives to empower Iranian-Americans to be a voice for the Iranian people's movement for freedom, human rights, and democracy. By transmitting the sacrifices and aspirations of the Iranian people to an American audience of policymakers, media, and concerned citizens, it is our hope that we may serve to better position our fellow Americans to understand and support the Iranian people in their struggle to establish a free, democratic Iran.

CITATIONS

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Front and Back

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