



November 8, 2022

Ursula von der Leyen
President, European Commission
Rue de la Loi/Wetstraat 200
1049 Brussels
Belgium

Dear President von der Leyen:

Thank you for your recent statements in support of the Iranian people bravely protesting the brutality of the Islamic Republic of Iran. Your words were powerful and inspire the Iranian people as they fight for their rights.

Through their brave protests, Iranians have been trying to telegraph to the international community that the Iranian system is unreformable. Decades of repression under reformist, pragmatic, and conservative presidents have made life there unbearable. The problems of the regime stem from its revolutionary ideology, ossified leadership, antisemitism, and a structural anti-woman mindset. The Islamic Republic is a radical cause, not an ordinary country. Its supreme leader has consistently prioritized the mission of his terror proxies over his own people.

The European Union says it is committed to promoting and protecting human rights, democracy, and the rule of law worldwide. Iran must be part of that conversation. It is well past time to isolate the Iranian regime, while empowering the Iranian people to fulfill their democratic aspirations. I respectfully submit the recommendations for the European Union to employ to reorient its policy towards prioritizing the rightful demands of the Iranian people.

The European Union should:

- Stop participating in nuclear negotiations with the Islamic Republic while Iranian authorities are suppressing protests and throttling the internet. Trying to revive the nuclear deal risks resourcing, via sanctions relief, the very oppressors of the Iranian people. Resolving this contradiction is paramount, and halting negotiations until the regime stops killing, injuring, and detaining protesters—and starts respecting their rights—would be the first step in that direction.
- Support withholding of frozen funds in foreign banks to the Iranian establishment, conditioning doing so on tangible improvement of the human rights situation.



- Enact sanctions on Iran's hostage-taking apparatus and insist on the unconditional release of all hostages, given Iran's longstanding detention of European nationals and taking several new Europeans hostage in recent weeks.
- Support invoking the snapback sanctions mechanism under U.N. Security Council Resolution 2231. Such a mechanism will reinstate international arms limitations on the Islamic Republic, like the arms embargo which lapsed in 2020 and the limitations on its missile program, which expire next year. This is critical to ensure the Islamic Republic's security forces do not acquire international assistance and legitimacy to increase the lethality of their arsenals.
- Advocate for the establishment of an independent United Nations (UN) investigative mechanism to hold Iranian leaders and security forces accountable for the oppression of the Iranian people. The Iranian government is unable and unwilling to mount independent investigations. This has been seen repeatedly throughout the last few years, especially after its downing of Ukraine International Airlines Flight 752 in 2020.
- Work with the United States in empowering Starlink and other companies with similar capabilities to provide a free and secure internet for the Iranian people.
- Support the establishment of a special channel exempt from U.S. sanctions to disburse frozen Iranian funds in foreign bank accounts abroad to striking workers inside Iran. The potential convergence of labor and political protests would represent a significant threat to the Islamic Republic.
- Work with and encourage social media platforms such as Instagram and Twitter to hinder Iran's cyber army's efforts in suppressing the voices of Iranian activists through tactics like shadow banning.
- Encourage its member states to expel sympathizers with the Iranian regime who work against EU interests. This includes shuttering entities like the Hamburg Islamic Center in Germany, which provide a permissive environment for terror recruitment for Iran's regime.
- Support efforts by its member states to isolate Tehran diplomatically. Reducing diplomatic presence, refusing meetings, and mounting campaigns to strip the Islamic Republic of its membership in international organizations, like the UN Commission on the Status of Women, will go a long way in forcing change in the Iranian establishment. The European Union should also downgrade its own diplomatic ties with the Islamic

Republic, including by declaring Iran's ambassador to the European Union persona non grata. Similar efforts were undertaken to strip Russia of such positions over its invasion of Ukraine, especially its suspension at the UN Human Rights Council. Given the repeated involvement of Iranian "diplomats" in illegal operations on European soil, the European Union should also reduce the number of permitted Iranian diplomatic personnel in EU countries and restrict their areas of geographic movement to only those essential to carry out their duties.

- Pursue multilateral sanctions against Iran's senior leadership for human rights abuses, making use of its Magnitsky Act authorities and harmonizing its respective designations with the U.S. government and G7 countries. Key targets should include sanctioning Iran's supreme leader; president; the supreme leader's son, Mojtaba Khamenei; and others under the Magnitsky authorities. The European Union should encourage member-states to take hard look at the families of regime officials who are living in the European Union and profiting off the Iranian establishment's corruption, and support revocation of visas and confiscation of their assets. Similar efforts have targeted Russian oligarchs in the aftermath of Moscow's invasion of Ukraine.
- List Iran's Islamic Revolutionary Guard Corps (IRGC) in its entirety as a terrorist organization. The U.S. government has already designated the IRGC as such, and Canada has taken expansive steps to sanction the IRGC. The Basij, which is brutally suppressing the Iranian people as they protest for their basic rights, is an arm of the IRGC and reports up through the chain of command to the commander-in-chief of the IRGC and ultimately to the supreme leader.
- List the Iranian proxy Hezbollah in its entirety as a terrorist organization, a step that would be particularly significant now given the group's reported role in suppressing protests in Iran.

Reinstate economic sectoral sanctions on Iran's regime to deprive it of the resources that will be used to further oppress the Iranian people. It should aggressively enforce such sanctions, working in tandem with the U.S. government. Specifically, it should reinstate the prohibition on importing crude oil, natural gas, petrochemical, and petroleum products from Iran. Furthermore, as it has done with Russia, EU companies should be forbidden to insure ships carrying Iranian oil anywhere in the world.

- Ban all Iranian terrorist-linked airlines from landing in EU airports, including Mahan Air and Iran Air. Mahan Air has long proved to be the IRGC's airline of choice, while Iran



Air has been used to convey UAVs and IRGC personnel to Russian forces to be used against Ukraine. Iran Air continues to fly to German airports four times each day.

- Terminate all banking licenses for Iranian banks still operating in the European Union. Bank Sepah, Bank Melli, Bank Saderat, Middle East Bank and the European Iranian Handelsbank all operate in Germany. France and Italy also permit multiple U.S.-sanction-designated Iranian banks to do business. Bank Sepah, for instance, has provided “direct and extensive financial services” to Iran’s Aerospace Industries Organization (AIO), responsible for the management of the Iranian missiles and drone programs.

I urge the European Union to seriously consider these policy recommendations. They would go a long way in ensuring that the European Union and its allies and partners have a comprehensive Iran policy, not just a nuclear deal policy, that empowers the Iranian people and not the Islamic Republic’s brutal regime.

Sincerely,

Robert Bartlett
Jason Brodsky
Governor Jeb Bush
Dr. Hiva Feizi
Olli Heinonen
Omid Iranvanipour
Claire Jungman
Matthias Küntzel
Sir Graeme Lamb
Senator Joseph Lieberman
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