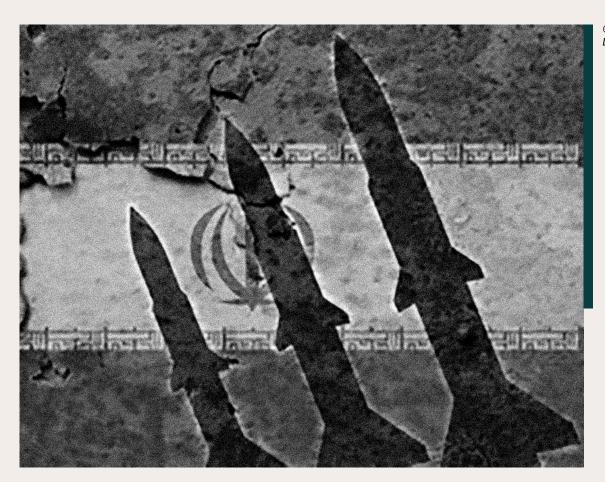


A 100 DAY PLAN FOR THE INCOMING TRUMP ADMINISTRATION ON IRAN

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INTRODUCTION

United Against Nuclear Iran (UANI) is issuing recommendations to the incoming Trump administration for a 100-day plan to fundamentally remake and reinvigorate U.S. policy towards the Islamic Republic of Iran. As the world's leading state sponsor of terrorism, the Iranian regime has for too long operated as the key source of regional destabilization, sowing decades of discord with relative impunity. From its long-term financing and arming of the world's most dangerous Islamist terrorist groups to more recently supplying the drones for Russia's invasion of Ukraine, all while repressing Iranians and blackmailing the world with the threat of a rush to nuclear weapons, Iran has never been held properly accountable.

This must end—and President-elect Trump, as well as many of his senior cabinet nominees, have already signaled their goal to ensuring a radical change in Tehran's malign behavior. UANI's recommendations encompass every major instrument of American national power: diplomatic, informational, military, and economic (DIME), incorporating both unilateral U.S. measures and initiatives to pursue with American allies.



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DIPLOMATIC

- » Presidential Iran Policy Speech: President-elect Trump should deliver a major policy address outlining his Iran strategy, which will provide an organizational framework for U.S. policy. The president should speak to not only Americans but also Iranians in making clear the U.S. government will aim to weaken the Islamic Republic's capacity for external aggression and internal repression, which will provide space for them to realize their own aspirations.
- » IAEA Censure Resolution: Lay the groundwork at the International Atomic Energy Agency (IAEA) Board of Governors for a censure resolution against Iran which refers its non-compliance with its Nuclear Non-Proliferation Treaty (NPT) obligations to the U.N. Security Council for further action.
- » Invoke U.N. Snapback Sanctions Mechanism: Express U.S. support for the E3 to invoke the snapback sanctions mechanism under U.N. Security Council Resolution 2231, which would restore the pre-Iran nuclear deal U.N. restrictions on Iran and collapse the framework of the failed nuclear deal once and for all. The snapback sanctions mechanism expires in October 2025, and planning to invoke the mechanism should begin immediately after President-elect Trump takes office.
- » Form a Countering Iran Coalition: Establish a new coalition of countries which are prepared to take steps to isolate and pressure the Islamic Republic across a range of files: nuclear, drone and missile proliferation, regional aggression, terrorism, hostages, human rights abuses, and corruption. The P5+1 (the U.S., U.K., France, Germany, Russia, and China) is no longer a

- viable united grouping in which to deal with Tehran given geopolitical developments. However, Europe's threat perception against Tehran has increased significantly due to Iran's arming of Russia in its war against Ukraine. This provides a strong opportunity to rally European allies and others.
- » Restrict Movements of Iranian Officials at the U.N.: Reinstate the travel restrictions the first Trump administration imposed on Iran's U.N. Mission in New York, limiting Iranian diplomats' travel to between their residences, their office, and the U.N. Headquarters Building. The U.S. should deny visas to the Iranian president, foreign minister, and other officials to visit New York for U.N. meetings so long as Tehran is threatening U.S. persons.
- » Harmonize Human Rights Sanctions: Work with U.S. allies and partners to harmonize sanctions on Iranian officials responsible for human rights abuses.
- » Implement the MAHSA Act: Implement the MAHSA Act, which authorizes sanctions on Iran's supreme leader and other senior officials and entities under counterterrorism and human rights abuse designation authorities. The U.S. should ask its allies and partners in the Countering Iran Coalition to do the same under their respective authorities.
- » Designate the Houthis as an FTO: Reinstate the foreign terrorist organization (FTO) designation of the Iran-backed Yemeni Ansar al-Allah militant group (Houthis), which has caused severe disruption to global shipping through its strikes and hijacking of ocean-going vessels, especially in the Red Sea.

- » IRGC Proscription Campaign: Spearhead efforts to get as many countries around the world as possible to designate the Islamic Revolutionary Guard Corps (IRGC) as a terrorist organization, as the U.S. government did during President-elect Trump's first term. U.S. allies, including the U.K., have previously signaled their willingness to consider the designation.
- » Combatting Infiltration: Sanction and dismantle, in conjunction with European allies, the network of Iranian regime influence and infiltration centers in the West, which operate under a religious-cultural guise. As UANI has revealed, these centers are linked directly to the IRGC and its efforts to nurture homegrown Islamist radicalization and extreme antisemitism on Western soil.

INFORMATION OPERATIONS AND COMBATTING CENSORSHIP AND DISINFORMATION

- » Psychological Operations: Assemble a task force on Iran that specializes in Persian-language psychological operations (PSYOPs) to embolden the Iranian people's democratic aspirations, whilst simultaneously running PSYOP campaigns targeting the regime and IRGC, with the intent to weaken, divide, and undermine them.
- Weaken Censorship: Prioritize enhancing efforts to ensure the Iranian people have greater access to uncensored information. This should include supporting and expanding the deployment of technologies such as Starlink satellite dishes, which provide alternative channels for reliable communication and information dissemination.
- **Counter Disinformation and Malign Influence Operations:** This requires a comprehensive strategy that addresses Iranian regime disinformation and <u>influence campaigns</u> in the Middle East region and the Western world. Such an approach could involve amplifying credible narratives, collaborating with international partners and technology companies to target and remove Iranian disinformation, and leveraging digital platforms to expose and debunk falsehoods propagated by the Iranian regime. This should also include sanctions on Iranian regime <u>individuals</u> and <u>entities</u> which seek to penetrate Western democracies, including academia, research institutions, and the media, to promote its interests. The incoming administration should work with the public and private sectors to promote appropriate best practices, due diligence, and disclosure standards for all engagements with the Islamic Republic of Iran.
- » Revitalize U.S. Public Diplomacy: The Trump administration should spearhead an effort to revitalize U.S. public diplomacy on Iran, especially social media accounts to produce creative and

relevant content on the stories with which Iranians are engaging in real time. U.S. messaging should focus on isolating the Islamic Republic and declassifying intelligence about the Iranian leadership's corruption, repressive apparatus, and waste, while empowering the Iranian people.

MILITARY AND SPECIAL OPERATIONS

- Declaratory Policy on Use of Force: President-elect Trump should use his policy speech to publicly outline in unambiguous terms that the U.S. will not hesitate to utilize military force to destroy Iran's nuclear program if it takes steps to further advance its capabilities. He should also demand Iran accept the principle of zero enrichment or reprocessing. Likewise, he should state publicly that if Iran or its proxies harm an American, the attack will be answered with direct U.S. strikes on IRGC facilities inside Iranian territory.
- Transfer Advanced Munitions to Israel: Begin discussions with the Israeli government to transfer the GBU-57 Massive Ordnance Penetrator to Israel to enable it strike hardened nuclear targets like the Fordow Enrichment Plant, as well as lease it a B-2 bomber as a delivery vehicle. The Trump administration should also ensure that Boeing KC-46A Pegasus aerial refueling aircraft which are reportedly scheduled for delivery to Israel beginning in 2025 proceed as expeditiously as possible.
- » Increase Weapons Shipments to Arab Partners: The incoming Trump administration should increase weapons shipments to Arab partners to improve their deterrent capability against Iran.
- Targeted Strikes: Strike IRGC commanders, Quds Force, and Intelligence Ministry assets inside Iran if the Islamic Republic harms U.S. persons. The January 2020 targeted killing of Major General <u>Qasem Soleimani</u> was a significant blow to the IRGC Quds Force, undermining its capabilities and institutional memory. The new administration should also make clear the Houthi leadership will be possible military targets in response to any Houthi attacks on U.S. civilian or military vessels.
- » Degrade Instruments of Repression: Target the IRGC's suppressive apparatus—via cyber and kinetic means—if it decides to violently suppress Iranian protestors the next time Iran experiences unrest. Such measures would reduce the IRGC's capabilities, decrease bloodshed on the Iranian streets, and support the Iranian people's democratic aspirations.
- » Military Defector Program: Develop a targeted and comprehensive defector program that encourages significant regime actors – including members of the IRGC, Basij, and other security-related bodies – to defect from the regime.

Supreme Leader Ayatollah Ali Khamenei

ECONOMIC AND SHIPPING

- » Financial Sanctions: Prioritize combatting the regime's money laundering and terror financing through a multifaceted approach that targets the Islamic Republic's visible and black/shadow economy. Internationally, the U.S. should, in conjunction with its allies and partners, impose and enforce robust sanctions on the regime's critical financial institutions, including shadow and front entities that operate under "charitable" status and the individuals linked to them. The new administration should also drive a public campaign that offers rewards for critical information to encourage Iranian defectors or those who work with the Islamic Republic to expose the regime's corruption, money laundering, and illicit activities.
- » Shutter Iranian Banks: Work to force U.S. allies and partners, especially in Europe, to close Iranian banks operating there. For example, Bank Melli, Bank Sepah, Bank Saderat, and the Europäisch-Iranische Handelsbank continue to operate in Germany despite their links to Tehran. Similarly, multiple U.S.sanctioned Iranian bank branches also operate in the UK, France and Italy, as well as across the Middle East and in east Asia. They should be shut down.
- » Counter Corruption: The U.S. government should, in conjunction with allies and partners, establish an Iranian Elites, Proxies, and Oligarchs Task Force (IEPO)—modeled after the existing task force focused on Russia—to seize illicit wealth stolen from the Iranian people that regime-linked oligarchs and their families have in U.S. and allied and partner jurisdictions, including Europe.

- Democratization Fund: Use frozen Iranian assets, in conjunction with European allies, to establish a democratization fund that provides financial aid—including a strike fund—to the Iranian people in support of their democratic aspirations. The model should replicate the transfer of frozen Russian assets in aid of Ukraine. This should include any wealth linked to the Islamic Republic oligarchs that Western governments are able to seize.
- » Public Messaging on Sanctions Evasion: Declare it U.S. policy to fully enforce all sanctions on Iranian oil and reduce sales of Iranian oil. The Trump administration should publicly make clear to China, the leading purchaser of Iranian oil, that ongoing purchases will have immediate and strong negative consequences for Washington's relationship with Beijing.
- **Enhance Sanctions Enforcement:** Prioritize enforcing maritime sanctions to disrupt Iran's illegal oil exports. This includes robust implementation of the Iran Sanctions Act (ISA), the Countering America's Adversaries Through Sanctions Act (CAATSA), and the Iran Freedom and Counter-Proliferation Act (IFCA). These laws provide the necessary framework to penalize entities involved in shipping, insuring, financing, or otherwise facilitating the transport of Iranian oil. Enforcement efforts should focus on identifying and targeting vessels transporting Iranian oil and/or engaged in ship-to-ship (STS) transfers of Iranian oil—particularly in high-risk areas like the Persian Gulf and East Asia—while leveraging these statutes to expand sanctions on those complicit in sanctions evasion.

- » Designate Iran's Entire Ghost Fleet: Designate the entire fleet of vessels involved in Iran's sanctions evasion—commonly referred to as the "ghost fleet"—for facilitating terrorism and sanctions violations. This designation will disrupt the operational and financial networks supporting these vessels. By cutting off their ability to access insurance, flagging services, and international markets, the administration can expect a significant reduction in Iran's oil exports, thereby curtailing the regime's primary revenue source.
- » Promote Transparency in the Maritime Sector: Advocate for stricter compliance measures within the global shipping industry, including mandatory automatic identification system (AIS) transparency, to mitigate <u>Iranian evasion tactics</u> such as AIS manipulation and ghosting.
- » Engage International Flagging and Class Societies: Work with flagging registries and classification societies to revoke the registration and certification of vessels involved in smuggling Iranian oil. Highlight their role in enabling Iran's sanctions evasion to encourage proactive disengagement.
- » Collaborate with Maritime Allies: Form a coalition of countries committed to combating maritime sanctions violations. UANI has previously demonstrated the efficacy of multilateral cooperation by exposing Iran's shadow fleet, a tactic that can be expanded to include intelligence sharing and joint operations.

- » Publicly Name and Shame Violators: Utilize public pressure campaigns to expose shipping companies, insurance providers, and other entities complicit in facilitating Iran's oil trade. UANI has effectively used this strategy to drive accountability within the maritime industry.
- **» Implement Port State Controls:** Encourage U.S. allies and partners to enforce port state controls on suspicious vessels, denying them entry and services to deter the transportation of illicit cargo
- Tighten Maritime Cybersecurity: Include measures to counter Iranian cyber threats targeting maritime infrastructure and vessels, ensuring that critical shipping lanes remain secure from sabotage or disruption.
- Sanction Shipping Networks Supporting the IRGC: Work to dismantle networks tied to the Islamic Revolutionary Guard Corps (IRGC), which leverage the global shipping industry to fund regional aggression and internal repression.
- » Launch Sea Captains Defectors/Rewards Program: Using UANI's database, the U.S. should formally notify individual Captains and Ship Masters that they must commit to not carry Iranian oil aboard their vessels. Simultaneously, compliant Captains should be rewarded and encouraged to offload Iranian oil into U.S.-controlled/friendly ports.

CONCLUSION

Taken together, these recommended actions form a decisive blueprint for the incoming administration. By implementing them swiftly and effectively, the United States can significantly curtail the Islamic Republic of Iran's capacity for terror, disrupt its destabilizing influence, and reinforce America's strength and security. The plan's scope, intensity, and coordination – across diplomatic, informational, military, and economic fronts – will ensure that Iran is held accountable by strong and decisive U.S. leadership.

