



Statement before the Committee on Oversight and Government Reform  
Subcommittee on Nation Security  
On "Protecting America from a Bad Deal: Ending U.S. Participation in the Nuclear  
Agreement with Iran"

# Putting American Security First in the Post-JCPOA Order

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Chairman DeSantis, Ranking Member Lynch, and Honorable Members, thank you for the opportunity to testify today about the impact of President Donald Trump's decision to end U.S. participation in the Joint Comprehensive Plan of Action (JCPOA) on the threat posed by the Islamic Republic of Iran's nuclear ambitions.

The JCPOA was a complex agreement that the Obama administration and its supporters said cut off all of Iran's pathways to a nuclear bomb. Given the reality of JCPOA controls and only limited access to potential Iranian nuclear sites, such claims were an exaggeration. While there remains ample room for diplomacy, protecting American security and that of our regional allies requires dealing with the reality of Iranian behavior, rather than a public relations whitewash of it. To do anything other than addressing JCPOA flaws head-on would be national security malpractice.

### **Did the JCPOA ensure "unprecedented verification"?**

One of the greatest misconceptions of the JCPOA revolved around the ability to confirm Iranian compliance. Contrary to the Obama administration's insistence that the JCPOA ensured "unprecedented verification" to guarantee Iran had no secret nuclear program, the JCPOA reversed decades of nonproliferation precedent.

The Apartheid regime in South Africa, for example, maintained a covert nuclear weapons program throughout the 1970s and 1980s. As President Frederik Willem de Klerk steered South Africa toward a post-Apartheid future, he decided to come clean about South Africa's program and join the Nuclear Non-Proliferation Treaty (NPT) as a non-nuclear weapons state. The International Atomic Energy Agency (IAEA) agreed both to dismantle the six nuclear warheads South Africa had built and to confirm and then certify South Africa's compliance with the NPT. Despite a fully compliant South African government welcoming inspections anywhere and anytime and its granting of full access to its covert nuclear archives and their complete transfer to inspectors, it still took the IAEA 19 years to certify South Africa's compliance as complete.

Likewise, when, on December 19, 2003, Libyan leader Muammar Qadhafi agreed to forfeit his nuclear program, the international community required Libya to dismantle physically its nuclear infrastructure. On January 18, 2004, for example, Donald Mahley, deputy assistant secretary of State for Arms Control, led a team of experts to Libya to inventory Libya's nuclear program components. Nine days later, the U.S. airlifted 27 tons of documents and components relating to Libya's nuclear and ballistic missile programs. They took no chances and rushed, knowing that the mercurial Qadhafi might reverse course at any time. On March 6, 2004, a U.S. tanker sailed from Tripoli removing additional equipment and SCUD missiles that North Korea had sold Libya, and, two days later, U.S., British, and IAEA officials arranged to fly 13 kilograms of highly enriched uranium to Russia.<sup>1</sup>

The JCPOA, however, not only allowed Iran to keep its base nuclear infrastructure intact but also permitted the Islamic Republic to sidestep ratification of the Additional Protocol, a protocol to enable greater verification of states' compliance with their safeguards agreements. The origin of the Additional Protocol lay in IAEA failure. Between 1980 and 1990, the IAEA had given Saddam Hussein's Iraq 11 clean bills of health certifying that Baghdad was not working on a covert nuclear program. But, documents seized during the 1991 Operation Desert Storm and the subsequent defection of Saddam's own son-in-law revealed that Iraq had fooled IAEA inspectors. As a result and to plug the loopholes that Saddam Hussein had exploited, the IAEA created the Additional Protocol in which states would accept more rigorous inspections in exchange for more generous

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<sup>1</sup> Douglas Frantz and Josh Meyer, "The Deal to Disarm Kadafi," *Los Angeles Times*, March 13, 2005.

technology sharing. Unlike 129 other states, Iran has refused to ratify the Additional Protocol, the necessary precursor to its inspection regime. Rather than demand ratification, JCPOA negotiators settled for an Iranian promise to abide by its terms without locking them in.

Alas, this played into the hands of those in the Iranian regime who wished to benefit from the perception of cooperation without actually committing to long-term cooperation. On October 21, 2003, for example, European foreign ministers announced an agreement for Iran to ratify the Additional Protocol with Hassan Rouhani, at the time secretary of Iran's Supreme National Security Council and the regime's chief nuclear negotiator.<sup>2</sup> The next day, however, Rouhani declared, "As long as Iran thinks this suspension is beneficial, it will continue, and whenever we don't want it, we will end it."<sup>3</sup> While supporters of the JCPOA argue that the Iranian leadership's pledge to abide by the Additional Protocol is as good as formal ratification, Rouhani's refusal to lock Iran into permanent compliance had long precedent.

Rouhani, for example, has bragged about how he used diplomacy with the West to run the clock down as Iran created what is now known to have been a nuclear weapons capability. "When I was entrusted with this portfolio, we had no production in Isfahan," he explained, saying that he succeeded in then building not only Iran's major uranium-enrichment facility at Natanz but also its plutonium-producing heavy-water plant in Arak. "The Islamic Republic acted very wisely in my view and did not allow the United States to succeed," he added.<sup>4</sup> Indeed, as Rouhani stepped down from his long tenure as secretary of the Supreme National Security Council, he credited Iran's ability to progress in the face of commitments to the West to a doctrine of surprise. "The actions of the regime took the world by surprise and they were usually unpredictable. . . . [The world does] not know what we will do a month from now," he explained.<sup>5</sup> Abdollah Ramezanzadeh, the former spokesman of President Mohammad Khatami, confirmed such deceit. "We had an overt policy, which was one of negotiation and confidence building, and a covert policy, which was continuation of the activities," he explained.<sup>6</sup>

One major JCPOA flaw seldom discussed in various assessments is the problem of off-site work. While it is difficult to hide centrifuge cascades (although Iran has done just this in the past) and sanitize illicit enrichment sites ahead of inspections, the same is not true for facilities in which warhead design and mathematical modeling might occur; these are more mobile and more easily sanitized. Too often, there is an assumption that countries like Iran that have involved themselves in illicit weapons work limit such work to within their own territory. But, there have long been military links between North Korea and Iran. There is hardly a missile test in North Korea in which Iranian scientists are not also present and vice versa. It is not a huge leap to question whether North Korea might provide Iranian scientists space to continue work that would be subject to inspections inside Iran itself. In such a scenario, the JCPOA provides no inspection or verification authority.

## **Did the JCPOA end the missile threat?**

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<sup>2</sup> Foreign and Commonwealth Office, "Agreed Statement at the End of a Visit to the Islamic Republic of Iran by the Foreign Ministers of Britain, France, and Germany," October 21, 2003.

<sup>3</sup> BBC News, "Iran Agrees to Key Nuclear Demands," October 21, 2003, [http://news.bbc.co.uk/2/hi/middle\\_east/3210574.stm](http://news.bbc.co.uk/2/hi/middle_east/3210574.stm).

<sup>4</sup> *Etemaad*, Nagoftaha-ye Hassan Rowhani as diplomasi hasteh-ye dureh eslahat az europa qol vatave tarehi Amrika ra gerefteh budam," October 24, 2011.

<sup>5</sup> Hassan Rouhani, "Iran's Measures Rob the Americans for Foresight" (speech, Ferdowsi University Hall, February 9, 2005) *Rahbord* (Journal of the Expediency Council's Center for Strategic Studies, Tehran), Spring 2005.

<sup>6</sup> Fars News Agency (Tehran), "Ramezanzadeh: Siyasat-e Post Perdeh Dawlat-e Khatami Adameh-e Fa'liyatha-ye Hasteha-ye Bud," June 14, 2008.

One of the greatest problems with the JCPOA has been its erosion of prohibitions on Iranian ballistic missiles. A nuclear weapons program has three basic components: enrichment, warhead design, and delivery systems. Iran's covert efforts regarding the former contributed to the IAEA's 2005 decisions to find Iran in noncompliance with its Nuclear Non-Proliferation Treaty Safeguards Agreement and to refer the Iranian file to the United Nations.<sup>7</sup> The 2003 and 2007 National Intelligence Estimates, the IAEA's November 2011 catalogue of Possible Military Dimensions to Iran's nuclear program, and the Iranian nuclear archives exposed publicly by Israeli Prime Minister Benjamin Netanyahu make clear that Iranian work on warheads is well advanced, and, even if it has since been shelved, Iranian authorities have taken steps to preserve the knowledge.

The last major aspect of a nuclear weapons program, therefore, is delivery. UN Security Council Resolution 1929 stated that the Security Council "decides that Iran shall not undertake any activity related to ballistic missiles capable of delivering nuclear weapons." However, to conclude the JCPOA, the Iranian government demanded to change that language. Instead of outright prohibiting work on such ballistic missiles, UN Security Council Resolution 2231 "called upon [Iran] not to undertake any activity related to ballistic missiles designed to be capable of delivering nuclear weapons." Iranian authorities have subsequently tested more than two dozen ballistic missiles, but they argue that they are designed for other purposes and that, even if they are capable of carrying nuclear warheads, they are allowed. Given official Iranian government and IRGC rhetoric both promoting genocide and the eradication of the State of Israel and threatening peace and stability for U.S. allies such as Saudi Arabia and Bahrain, it is crucial to address Iran's burgeoning ballistic missile threat head-on.

### **Did sanctions relief benefit ordinary Iranians?**

Part of the U.S. logic driving initial negotiations was the belief that engaging with and allowing Iranian regime reformers to better the economy would privilege them against hardliners. What seemed sophisticated in Washington, however, looked transparent in Tehran. Speaking on the 30th anniversary of the seizure of the U.S. embassy on November 4, 2009, Supreme Leader Ali Khamenei declared, "[Reformists] can't roll out the red carpet for the United States in our country. They should know this. The Iranian nation resists." Perhaps a greater flaw in the U.S. strategy, however, was the presumption that reformers were more sincere than engaged in a game of good cop-bad cop. In reality, Rouhani had always been the regime's "Mr. Fix-it," and reformists more broadly were committed to retaining Ayatollah Ruhollah Khomeini's vision of clerical rule.

Rouhani's main objective in the run-up to the JCPOA was financial relief. According to official Iranian statistics, in the year before the beginning of negotiations, Iran's economy had shrunk 5.4 percent, and inflation on staples such as bread, meat, and milk had increased between 30 and 50 percent.<sup>8</sup> Rather than use its financial leverage to force greater Iranian concessions, the Obama administration promised sanctions relief. Estimates of the windfall amount range from the tens of billions of dollars to \$100 billion. In order to create a disincentive for President Obama's successor to abandon the deal, the JCPOA awarded Iran such relief upfront rather than calibrated to compliance. While some cash ended up with creditors and not in Iran itself, even the high-end estimates of Iranian benefits from the deal fail to account for additional investment.

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<sup>7</sup> International Atomic Energy Agency, Board of Governors, "Implementation of the NPT Safeguards Agreement in the Islamic Republic of Iran," September 24, 2005, GOV/2005/77.

<sup>8</sup> *International Iran Times*, "Economy Shrank 5.4% Last Year," September 13, 2013; and MehrNews.com, "Narkh-e Tavarram 31 Dar Sad Shod / Jodule Garani-ha Dar Sal 92" [Inflation Rate Was 31 Percent/Table of Expenses for Year 2012-2013], June 3, 2013.

Alas, there is no evidence that any of this money benefited ordinary Iranians; quite the contrary, the money that has flowed into Iran in the post-JCPOA period appears to have disproportionately filled the coffers of the Islamic Revolutionary Guard Corps (IRGC). Here, the problem is structural. The IRGC rose to prominence during the 1980–88 Iran-Iraq War. At the conclusion of the fighting, they did not want simply to return to the barracks and subordinate themselves to politicians who they believed had lived the soft life during the war. Instead, they decided to establish an independent stream of funding. Their engineering and manufacturing unit formed *Gharargah Sazandegi-ye Khatam al-Anbiya* (Construction Base of the Seal of the Prophets).

Fast forward three decades, and Khatam al-Anbiya dominates the Iranian economy, controlling by some estimates up to 40 percent of Iranian GDP. Today, it controls dam building, highway and road construction, tunnel drilling, pipelines, and water systems. In addition, IRGC companies build cars, computers, telephones, scanners, and SIM cards. Add into the mix supermarket chains, shipping, and oil, and the stranglehold is complete. Over the past decade, Khatam al-Anbiya has reaped tens of billions of dollars in no-bid contracts, further privileging the IRGC over the ordinary economy.<sup>9</sup>

European companies and oil firms may claim due diligence in avoiding IRGC investment, but it is near impossible to avoid IRGC shell companies. When the French automobile manufacturer Peugeot, for example, partners with Iran Khodro Group, they are essentially partnering with an IRGC subsidiary company. The same is true with the relationship between Japanese companies Yamaha and Mazda and the Bahman Group. Iranian workers seldom benefit from foreign direct investment in IRGC-linked companies, as Khatam al-Anbiya uses its privileged status to skirt basic labor laws and often defaults on wages. Indeed, demand for back wages fuels Iran's trade union movement.

Nor have other Iranian commercial deals signed in the wake of the JCPOA and ostensibly meant to benefit ordinary Iranians really had that purpose. One of the highest-profile post-JCPOA deals has been Iran Air's efforts to purchase up to 100 Boeing aircraft and a similar number of Airbus plans.<sup>10</sup> Deal proponents say that the sale will help Iran reverse a poor commuter flight safety record, but a quick survey of the planes that Iran Air has sought to buy or lease suggest the acquisition of new aircraft is not solely for civilian purposes. After all, Iran Air's pre-JCPOA fleet totaled just 43 planes, more than one-third of which were relatively small 100-seaters. To suggest that Tehran's only interest in ordering new Boeings was passenger safety is to accept that the Iranian government wanted Iran Air to be larger and to carry more passengers than Japan Airlines, Qatar Airlines, and Singapore Airlines. Simply put, if Iran's intention were safe air travel at current capacity, they could achieve their aims with an order one-fifth as large. Already, reports that the IRGC is using new aircraft to ferry troops, militiamen, and arms into Syria belie the notion that the Iranian government sought to use the lifting of sanctions and new possibilities of investment to better the lives of ordinary Iranians.

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<sup>9</sup> *Abrar* (Tehran), "Vagozari-ye 850 Melyoun Dolar Prozhepye Jadid-e Nafti Be Khatam al-Anbia" [\$850 Million New Oil Project Given to Khatam al-Anbia], March 16, 2010; *Abrar* (Tehran), "Gharargah-e Khatam al-Anbia Jaygozin-e Torkiyeh Dar 3 Faz-e Parse Jonoubi Mishavad" [Khatam al-Anbia Base to Replace Turkey in Three Phases of the South Pars], April 19, 2010; *Pol* (Tehran), "Jaygozinan-e Dakheli-ye Shell va Repsol Dar Parse Jonoubi" [Domestic Replacements for Shell and Repsol in South Pars], June 5, 2010; and *Mehr* (Tehran), "Vagazari bidun nashrifat 2 pirouzeh-i nafti beh qirargah Khatam al-Anbia" [No-Bid Contracts for Two Oil Projects Awarded to Khatam al-Anbia], February 26, 2011.

<sup>10</sup> Robert Wall, "Boeing Signs Deal to Sell Jets to Iran's State Airline," *Wall Street Journal*, June 21, 2016; and Rick Gladstone, "Delays Threaten to Unravel Iranian Plans to Buy 200 Jetliners," *New York Times*, July 22, 2016.

Also belying the notion that the Iranian government has used sanctions relief to benefit the lives of ordinary Iranians is the senior regime officials' shopping spree in the post-JCPOA period. In November 2015, Iranian Air Force commander Hassan Shah-Safi took an extended tour of Chinese state companies that are manufacturing aircraft and air defense hardware with a view toward future purchases.<sup>11</sup> Not long after, the Iranian Defense Ministry announced the purchase of new sniper rifles from Russia.<sup>12</sup> Tehran and Moscow subsequently entered into talks for a \$10 billion arms deal.<sup>13</sup> In April 2018, for example, Behzad Etemadi, the deputy head of Iran's Industrial Development and Renovation Organization (IDRO), announced an agreement between the IDRO and Russian Helicopters to manufacture two helicopter models inside Iran.<sup>14</sup> Iran's official defense budget continues to rise, and that does not take into account off-books IRGC profits.<sup>15</sup>

### **Does unilateralism work?**

It is easy to point out flaws in the JCPOA, but rehashing past debates is ultimately not useful unless there is a strategy to address some of the agreement's weaknesses. Two of the most trenchant criticisms about President Trump's decision to withdraw from the JCPOA have been (1) that abandoning the agreement erodes the meaning of America's word and (2) that it will fail to bring Iran to heel because European partners, let alone Russia and China, will not abide by U.S. unilateral sanctions.

While European leaders might complain about Trump's decision to step away from the JCPOA, the president was within his legal rights to do so. In a November 2015 letter, Julia Frifield, assistant secretary of State for legislative affairs under Secretary of State John Kerry, explained that the JCPOA was neither "a treaty [n]or an executive agreement, and is not a signed document" and instead only "reflects political commitments."<sup>16</sup> Had Kerry sought to treat the JCPOA as a treaty subject to Senate ratification, not only would it likely have survived shifting political winds, but also he might have used the necessity to negotiate a stronger agreement, more consistent with nonproliferation and verification precedent.

While multilateralism brings theoretical legitimacy to international dealings, criticism of unilateralism often falls flat because it ignores that unilateral measures are often more effective than multilateral ones and because there is ample precedent of European states, Russia, and China abiding by unilateral U.S. measures with which they disagreed. In 1995, for example, as Tehran's terror sponsorship and nuclear program accelerated, Clinton issued two Executive Orders in 1995, the first targeting Iran's oil industry and the second banning most American trade with and investment in Iran.<sup>17</sup> Many companies initially sought to bypass U.S. sanctions by shifting operations to European subsidiaries. Congress addressed this the following years with the Iran-Libya Sanctions Act, which empowered the United States to act against private companies investing in Iran. In 1997, Clinton tightened financial restrictions to close loopholes in which

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<sup>11</sup> Fars News Agency, "Didar va Goftegu-ye Farmandehan-e Niru-ye Hava-ye Artesh-e Iran va Chin dar Peken" [Meeting and Conversation Between the Air Force Commanders of Iran and China in Beijing], November 2, 2015.

<sup>12</sup> Defa Press, "Moshkhasat AK-103: Aslahah Polermeri" [Profile: AK-103, Plastic Gun], August 7, 2016.

<sup>13</sup> Reuters, "Russia and Iran in Talks over \$10 Billion Arms Deal: RIA," November 14, 2016.

<sup>14</sup> Parsine.com, "Iran ba Komak-e Rasha Balgerd Misazad" [Iran to Build Helicopters with the Help of Russians], April 24, 2018.

<sup>15</sup> *Iranian Student News Agency*, "Sehom Bish az 400 Trilyon Riali Nehadha-ye Nizami az Budgeh 97" [Share of Military in 2018 Budget More Than 400 Trillion Rials], December 10, 2017; and "Budgeh-e Defa'e 145 dar sad nesbat beh Agaz Dawlet Rashad Dashteh Ast" [Defense Budget Grew 145% Since the Beginning of Administration], *Iran*, April 19, 2017.

<sup>16</sup> Julie Frifield, assistant secretary of state, letter to the Hon. Mike Pompeo, U.S. House of Representatives, November 19, 2015.

<sup>17</sup> Executive Order 12957 (March 15, 1995); and Executive Order 12959 (May 6, 1995).

companies exported American goods to Iran through third countries.<sup>18</sup> European companies—and European diplomats—complained about the U.S. position, but reality required acquiescence: They simply were unwilling to sacrifice access to the U.S. market and multibillion-dollar penalties to trade with Iran.

The Clinton administration also faced resistance to its punitive efforts from prominent officials of both parties. Former National Security Advisers Zbigniew Brzezinski and Brent Scowcroft, for example, argued that a strategy swapping sanctions with incentives would more likely moderate Iran's behavior.<sup>19</sup> The idea to flip rogues with trade may sound good in theory, but there is little evidence to suggest that it works in reality. Proponents of a moneyed embrace often cite China but ignore that, decades after the Nixon administration began its engagement of the People's Republic, China remains a one-party dictatorship and a potent military threat to U.S. interests.

Before the JCPOA, European powers tried to modify Iranian behavior and bolster the prospects of Iranian reformists through trade. Between 1998 and 2005, European Union trade almost tripled with the Islamic Republic, and, at the same time, the price of oil nearly quintupled. Importantly, this was at the time Rouhani was in charge of Iran's security policy and also coincided with the so-called "Dialogue of Civilizations." While Khatami sought to charm the West, Rouhani invested the bulk of the hard currency windfall in its ballistic missile program, its then-covert nuclear enrichment facilities, and its nuclear warhead program. To suggest, as some proponents of the JCPOA have, that removing impediments to trade enabled the deal but that George W. Bush-era coercion backfired as the Islamic Republic expanded its enrichment program ignores that the exponential increase in Iranian centrifuge operation occurred against the backdrop of this increase in trade.

Indeed, there is ample evidence that pressure works. Twice in the Islamic Republic's history, revolutionary authorities have sworn no surrender on core positions. In 1979, revolutionary leader Ayatollah Ruhollah Khomeini said Iran would not release their American hostages until Washington met his demands. He subsequently said he would accept no end to the Iran-Iraq War until the Islamic Republic achieved its top aims: the ouster and capture of Saddam Hussein. In both cases, however, pressure coupled with isolation caused the Islamic Republic to stand down: The 1980 Iraqi invasion of Iran made the international isolation suffered as a result of Iran's hostage taking too great to bear.<sup>20</sup> And, after rebuffing ceasefire proposals in 1982, Khomeini agreed to the same ceasefire six years later, likening his decision to "drinking a chalice of poison," but a necessary one in order to enable the Islamic Republic to survive.

And while the Obama administration initially opposed unilateral measures directed toward Iranian banks, the Senate passed them anyway, 100–0. The Obama administration subsequently acknowledged that it was those sanctions that brought Iran to the table.<sup>21</sup>

### **How does walking away from the JCPOA affect broad strategy?**

Too often, U.S. administrations craft bilateral strategies as if policy unfolds in a controlled environment in which outside issues or alternative precedents cannot penetrate. The world is not so sterile, however. As the Trump administration walks away from the JCPOA, it simultaneously seeks to negotiate a new denuclearization deal with North Korea.

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<sup>18</sup> Executive Order 13059 (August 19, 1997).

<sup>19</sup> Zbigniew Brzezinski, Brent Scowcroft, and Richard Murphy, "Differentiated Containment," *Foreign Affairs*, May/June 1997.

<sup>20</sup> Peter W. Rodman, "The Hostage Crisis: How Not to Negotiate," *Washington Quarterly*, Summer 1981.

<sup>21</sup> Jordan Fabian, "Obama: Sanctions Were Only Way to Bring Iran to Table," *Hill*, August 10, 2015.

While many critics of the current administration argue that walking away from the JCPOA undercuts the U.S. ability to negotiate with North Korea, the opposite may actually be true. North Korea has failed over the decades to uphold its agreements, always calculating that desperation to keep them at the table would lead officials in Washington to turn a blind eye toward cheating and to prioritize process. Trump's move on the JCPOA suggests to Pyongyang that rhetoric and sleight-of-hand will not substitute for substance.

Negotiations with North Korea will be fraught and unlikely to succeed for a number of reasons, which my American Enterprise Institute colleague Nick Eberstadt has chronicled in the *New York Times*.<sup>22</sup> Far more important to the calculations of rogue rulers considering negotiations with the United States has been the fate of Libyan dictator Muammar Qadhafi. The United States turned on Qadhafi after, in the wake of the Arab Spring, he engaged in massive human rights abuses. While the United States was under no obligation to protect Qadhafi against the popular uprising that ultimately killed him, there is widespread perception among other governments and diplomats that forfeiting nuclear program was a fatal mistake for the mercurial late Libyan leader.

In many ways, the debate surrounding Trump's decision to exit the JCPOA misses a broader point: Even if Trump had continued to adhere to his predecessor's political agreement, sunset clauses mandate consideration of a post-JCPOA future. When gauging Iranian sincerity, Obama placed much faith in an anti-nuclear weapons *fatwa* supposedly issued by Supreme Leader Khamenei. Putting aside the fact that this *fatwa* does not appear in collections of Khamenei's other *fatwas*, the ailing Khamenei's death would open the door for any successor to reconsider an anti-nuclear stance. In short, it pays to be proactive and prepared.

Here, the Trump administration's apparent willingness to wage economic warfare against the Iranian leadership is wise. The price of oil is sharply on the upswing, meaning that not only Khamenei but also the IRGC stand to reap a windfall if they can conduct business openly. To sanction Iranian activities now is to prevent Tehran from channeling tens of billions of dollars in oil sales and investment income into an increasingly lethal array of ballistic missiles and UAVs, proxies waging war across the region, and perhaps even renewed nuclear weapons work on the many military bases in practice left uninspected in the post-JCPOA order. Importantly, the Iranian public has seldom blamed the United States or other outside powers for Iran's economic woes; rather, they recognize the fault is their leaders' mismanagement and corruption. While regime propagandists seek to blame Washington and sanctions for supposed shortfalls in medicine, for example, the Iranian public sees that there is no shortage of money among regime bureaucrats to import luxury automobiles and other extravagant goods.

A broader post-JCPOA strategy, however, would not simply be limited to sanctions and the denial of oil profits to Tehran. Every comprehensive strategy should have diplomatic, informational, economic, and military components. While both Democratic and Republican administrations tend to sequence these elements, they should instead be applied simultaneously; the whole is greater than the sum of the parts.

Consider other economic strategies beyond sanctions: It is ironic that many European leaders and some on the American left support organized labor elsewhere in the world but give Iran a free pass. After all, every dollar the Iranian government is forced to direct toward back wages and

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<sup>22</sup> Nicholas Eberstadt, "North Korea's Phony Peace Ploy," *New York Times*, April 25, 2018.



better working conditions is money that Tehran cannot spend in Yemen, Lebanon, or Syria, or on ballistic missiles.

The United States traditionally falls short with information strategies. Even 39 years after the Islamic Revolution, the Iranian regime continues to struggle with questions of basic legitimacy in the eyes of its public. Both the White House and State Department, as well as Radio Farda and Voice of America–Persian Service, should systematically attack the legitimacy of Iran’s ruling class by exposing the rampant corruption of its leaders. According to Mohammad Reza Pour-Ebrahimi, head of the Iranian parliament’s Economic Affairs Committee, there has been an unexplained capital flow of \$30 billion out of Iran in just the first two months of 2018.<sup>23</sup> Taking such items from the Iranian press and amplifying them back to a broader Iranian audience undercuts the Iranian government’s ability to simply dismiss U.S. pronouncements as propaganda. Other informational strategies could include raising the cost of internal Iranian attempts at censorship. In the past, firewall bypassing technologies and VPNs such as Ultrasurf developed by Tiananmen Square refugees have been limited only by a lack of capacity in servers.

Military strategies do not necessarily mean bombing. While it might seem counterintuitive, removing U.S. aircraft carriers from the Persian Gulf would also increase pressure on Iran significantly: The Persian Gulf is both shallow and narrow, limiting maneuverability of carriers. If those same carriers were deployed in the northern Arabian Sea, then U.S. aircraft could strike at Iran while rendering ineffective the Iranian strategy of swarming with small boats.

The Iranian threat remains real, and the JCPOA did little to remove permanently the threat posed by Iran’s nuclear and missile programs. To strive to close loopholes left open by the JCPOA is common sense, and to prepare for the post-JCPOA future is responsible policy.

Thank you.

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<sup>23</sup> Saham News, “Cheh Kasani 30 miliard dolar sarmayeh ra az Keshvar Kharej Kardand?” [Who Took \$30 Billion out of the Country?], May 24, 2018.