November 1, 2018

Secretaries Pompeo and Mnuchin,

The re-imposition of U.S. secondary economic sanctions against Iran as part of the administration's "maximum pressure" campaign has raised deep concerns in the Iranian-American community and across the globe. These sanctions follow President Donald Trump's unilateral decision to withdraw the U.S. from the July 2015 Iran nuclear deal (known as the "Joint Comprehensive Plan of Action," or JCPOA), despite opposition from the international community, including America's traditional allies in Europe. While the stated purpose of the sanctions is to elicit "behavior change" from the Iranian government, they are not attached to a diplomatic process aimed at finding compromise. Instead, the administration's sanctions risk triggering a severe humanitarian crisis inside Iran and edging the U.S. towards another catastrophic Middle Eastern war.

While Secretary Pompeo and other administration officials have said the U.S. is pursuing a "campaign of pressure" in "solidarity with the long-suffering Iranian people," reinstated U.S. sanctions are in practice amounting to collective punishment of ordinary Iranians, not the Iranian government. Unlike U.S. sanctions against Russia and other countries, which were crafted to focus pressure on key decision-makers, the administration's Iran sanctions are suffocating the entire Iranian economy, causing the price of life-saving medicine to soar, shortages in previously abundant everyday medicines, and rapid inflation that is making even essential foodstuffs unaffordable for many Iranians.

Despite humanitarian exemptions on food, medicines, and agricultural products, U.S. banking and shipping sanctions are precluding most of this trade for the Iranian people. Fear of running afoul of sanctions and being excluded from the U.S. market or hit with hefty fines has led to most international companies avoiding any dealings with Iran. As a result, even Iranian private charities have been unable to import the drugs they desperately need. The chief executive of one such Iranian charity, which provides care to children with cancer, recently told the Christian Science Monitor: "The reality is that no companies, no banks want to be involved in any operation with Iran’s name, because they don’t know what will happen to them … Can you ask these sanctions designers what we should do?" It is cases such as this that led the International Court of Justice to recently rule that the United States needs to ensure Iran can acquire humanitarian goods and for both sides to avoid taking steps that would exacerbate the situation.

Sanctions have increased human suffering across Iranian society. As Sussan Tahmasebi, a prominent Iranian women's rights activist, has said: "Sanctions and poor economic conditions tend to impact the
most vulnerable groups hardest: women, children, the poor, and those living on the margins of society." The Iranian middle class is also among the groups that will bear the brunt of reinstated U.S. sanctions. A BBC analysis of the previous round of U.S. sanctions showed that Iran's middle class was "hit the hardest," with the average household budget of middle class families falling by 20 percent. This impoverishment of Iran's strong, educated middle class is a major blow to the country's organized civil society movement and diminishes prospects for peaceful democratic change.

Indeed, U.S. sanctions are empowering hardline forces who use their re-imposition to discredit their moderate rivals for negotiating with the West and as a pretext to harshly repress opposition voices under the guise of countering U.S.-led aggression. These anti-reform forces are far more threatened by Iran’s reintegration into the global economy than confrontation with the United States and are well positioned to take advantage of the economic desperation that sanctions are unleashing inside the country. Their influence will only grow as financial resources accumulate to only the unaccountable, well-connected few.

By offering little by way of diplomatic off-ramps, the administration's pressure campaign also dramatically increases the risks of a direct military confrontation with Iran. As a recent letter by former U.S. national security officials, including former Director of National Intelligence James Clapper and former Secretary of State Madeleine Albright warned, "the Administration has left Iran the option of either capitulation or war." In the absence of any serious diplomacy, the tripwires to a U.S.-Iran conflict could come from several directions, including over Iran’s nuclear program, regional tensions, or a naval confrontation in the Persian Gulf. As the signatories of the letter emphasize: "The intentional escalation of tensions and promotion of brinksmanship between the U.S. and Iran significantly increases the risk that neither side will be able to prevent a small, unintended clash from spiraling into a large, strategic conflict."

The damage to American credibility from the President’s about face on Iran is not limited to our standing with the Iranian people. Unlike the multilateral sanctions of the Obama era, which were partly based on UN Security Council resolutions, the Trump White House's reinstated sanctions have no international legal basis, are contrary to UN Security Council Resolution 2231, violate U.S. commitments under the JCPOA and have been met with global resistance. Rather than winning buy-in from key international partners, the administration has resorted to threatening other countries, including close U.S. allies in Europe, to cease doing business with Iran or lose access to the U.S. financial system. Such use of secondary sanctions is inherently aggressive and serves to diminish the long-term leverage of U.S. economic power.

There is an alternative to an unrelenting pressure campaign that will harm a population of 80 million far more than the government that rules them. The prior administration proved that tough, multilateral diplomacy with Iran can secure American interests while relieving the pressure on the Iranian people. Unfortunately, the current administration appears to have thrown out that successful playbook in favor of a maximum pressure approach that led to the disastrous 2003 invasion of Iraq. For the good of the people of Iran and the region, we implore you to end the administration’s pressure campaign, reenter the JCPOA and pursue your goals with Iran through negotiations instead of threats and maximalist demands.

Sincerely,

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