



The Case for Canada's Listing of Iran's Islamic Revolutionary Guard Corps (IRGC)

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Preface

- ❖ For the last 45 years the Western world has attempted to entice the Islamic Republic of Iran into forgoing or at least tempering its ideological malevolence towards the international community and its own citizenry – even as the regime responded unfailingly with ever greater malevolence.

- ❖ But over the last few years, the spectacle of the Iranian people confronting their tormentors on the streets of Iran and the regime’s continued commission and sponsorship of acts of extreme violence across the globe, is forcing the West to consider more efficacious measures to hold the regime to account and to protect Western countries from the ravages of the terrorist foreign policy of the Islamic Republic of Iran.

- ❖ Consequently, there has been increasing focus in the West on the necessity of designating Iran’s Islamic Revolutionary Guards Corps (IRGC) as a banned terrorist entity. The IRGC is the multi-billion-dollar engine driving the regime’s ascendance as the world’s most egregious state sponsor of terrorism and one of the planet’s most brutal violators of human rights within and beyond its own borders.

- ❖ The gravity of the threat to the international community demands that the West fully employ its arsenal of legal weapons to deter, impair, and delegitimize this entity, as so many experts, Iranian expats and dissidents, elected officials, NGOs and multiple other constituencies have demanded, and that this sui generis entity be added to the list of banned terrorist organizations.

- ❖ This document is intended to provide an up-to-date overview of the IRGC’s impeccable terrorist credentials; to outline the gravity of the IRGC threat to Canada and the West; and to provide answers to the main questions often proffered by those opposed to or concerned about, Canada’s recent designation of the IRGC as a terrorist entity.

Section #1 – Overview

The IRGC – A Unique Terrorist Threat

1. The Islamic Republic of Iran (IRI) is the Leading State Sponsor of Global Terrorism

The Islamic Republic of Iran (IRI) is widely acknowledged as the globe’s most egregious state sponsor of terrorism.¹ The regime allocates tens of billions of dollars yearly to terrorist exploits across the globe.² The IRI has aptly been described by experts as a global “franchise builder”³ and the “central banker” of international terrorism.⁴ As this memo will demonstrate, Iran’s Islamic Revolutionary Guard Corps (IRGC) in its entirety, was mandated and established by the regime as the IRI’s primary instrument for implementing its transnational terrorist agenda, by supporting, facilitating and participating in terrorist activity and sponsorship.⁵ Canada designated the IRI as a State Supporter of Terrorism in 2012 under the provisions of the *Justice for Victims of Terrorism Act* (JVTA).⁶ This listing has been reconfirmed by the Government of Canada every two years as stipulated in the JVTA.⁷ Under the JVTA, Canadian courts have found Iran and the IRGC liable for billions of dollars in damages for their terrorist endeavours⁸ and the harm they have inflicted on Canadians and others.

2. Terrorism is a Core Component of the IRI/IRGC Militia Doctrine

Since the founding of the IRI in 1979, the regime’s militia paradigm has been a central tool of its military doctrine and ideological framework. It has been described by Iran experts Saeid Golkar and Kasra Aarabi in *The View from Tehran: Iran’s Militia Doctrine*, as “a central part of the Islamic Republic’s ideological DNA”.⁹

Suzanne Maloney of the Brookings Institution, in her 2024 testimony before the U.S. Senate, highlighted the import of Iran’s militia doctrine in advancing the regime’s key objectives: “The ideology that shaped Iran’s post-revolutionary state was explicitly universalist, and its first leader, Ayatollah Ruhollah Khomeini, maintained that exporting the revolution was necessary for its survival, arguing that ‘[i]f we remain in an enclosed environment we shall definitely face defeat.’ Determined to spark a wider wave of upheavals, its leaders developed an infrastructure dedicated to toppling the status quo across the Muslim world through proxy groups ... and the instrumental use of extraterritorial violence. To extend the regime’s vision of an Islamic order, Tehran sought to subvert its neighbors through attempted coups, assassinations, and bombings.”¹⁰

As Maloney notes, the model has proven effective. “One of the most valuable tools in the Iranian arsenal is the network of militias that its leadership has cultivated, coordinated, trained, and supplied with advanced weaponry. The network extends across the broader Middle East from Lebanon to Pakistan, and these proxies have proven integral to Tehran’s security, longevity, and influence. They provide the Islamic Republic with strategic depth and wide regional influence and access while insulating Iran’s leadership from the full risk of their actions This proxy infrastructure has enabled the Islamic Republic to wield significant sway and sow instability across the broader Middle East and beyond while preserving plausible deniability”¹¹ Put simply by David Daoud of the Foundation for Defense of Democracies (FDD), Iran’s terrorist proxy strategy “has perfected the art of gradually conquering a country without replacing its flag”.¹² The regime’s broad array of transnational terrorist and militia networks on multiple continents

enables it “to maintain a significant and comprehensive global terrorist presence”¹³ and provide Tehran with strategic depth across the region. The network acts as “a veritable foreign legion acting in concert”¹⁴ to advance the regime’s prime directive and self-declared *raison d’être* of replacing the international order with a Khomeinist Islamist empire¹⁵ and destroying the State of Israel, deemed by the IRGC as “the primary enemy of Islam and of Muslims”.¹⁶ The Long War Journal lists a network of 19 Iran-sponsored terrorist organizations on Israel’s borders¹⁷ alone, which utilize terrorism in the regime’s pursuit of regional dominance and perpetual conflict with Israel,¹⁸ but these only account for a small portion of Iran’s terrorist proxies across the globe.¹⁹

“The Islamic Republic uses a range of institutions to achieve its ideological foreign policy objectives. [But] chief among these is the IRGC, which has become Tehran’s most valuable asset for implementing its militia doctrine.”²⁰ The IRGC is estimated to have approximately a quarter of a million militia personnel under its control.²¹

3. “Relationships with terrorist and militant groups are integral to Iran’s foreign policy”

The Iranian regime presents a terrorist threat that is different in kind and degree from others, which cannot be ignored when considering a terror listing of the IRGC. As noted by Daniel Byman of the Brookings Institution: “Relationships with terrorist and militant groups are integral to Iran’s foreign policy.”²² This efficacy of this doctrine has been clearly and consistently demonstrated over the last 45 years of regime aggression, subversion and intransigence and most recently during the hostilities precipitated by Iran and its multiple proxies in the October 7 attacks against Israel by Hamas, and in their aftermath. This doctrine should not be viewed as some have suggested, through the lens of “deterrence and state influence, the characteristics of a traditional nation-state”.²³ They are not merely defensive or reactive in their mission or nature. “This Western mischaracterisation of Iran’s use of militias which dominates public discourse, ignores the reality that the regime’s militia doctrine existed long before international sanctions and the escalation of tensions between the US, Israel and Iran. In fact, this doctrine is a central part of the Islamic Republic’s ideological DNA.”²⁴ Western commentators have often described Iran’s use of proxies in the region as being part of what has been called Tehran’s “forward-defence” deterrence strategy as a defensive posture “preempting the penetration of symmetric and asymmetric threats inside Iran’s borders”,²⁵ in which Iran is ostensibly creating a “wider security zone” to secure its national borders by going beyond its borders as part of a preemptive national security strategy”.²⁶

This misreading of Iran’s militia paradigm ignores that its principled aggression is openly enshrined as a core principle of the Islamic Republic’s constitution²⁷ which will be addressed later in this report. It disregards the regime’s 45-year pedigree of incessant terrorist aggression across the globe and looks past its doctrinal crystallization in the internal training manuals utilized in the IRGC curriculum for radicalizing IRGC recruits. This misperception “contradicts the way in which the IRGC defines its own support for Shia militias in places like Lebanon, Syria, Iraq and Yemen. Recruits are taught that Tehran supports these militias not for deterrence but with the objective of ‘exporting Islam’”.²⁸ The IRGC training manuals promote lethal violence against Jews, Christians, Zoroastrians, the West and an expansive and developed hierarchy of other “enemies” of Islam.²⁹ They define the exportation of Khomeini’s Islamic Revolution under the infallible leadership of the Supreme Leader as “its fighting objective”,³⁰ “to prepare the way for a single world community (*ummah*)” for “all Muslims to form a single nation”.³¹ Virtually all the primary structural mechanisms mandated in the constitution are crafted to promote this ideology and virtually all constitutional provisions can be suspended to that end. (for more on the IRI constitution see Section #3)

The regime's militia doctrine and its terrorist ethos are evident both in theory and in practice as aggressively expansionist in nature. It is grounded in an uncompromising theo-ideological framework which serves as the cornerstone of the regime's core constitutional imperative of violently exporting the regime's Islamic Revolution and overthrowing the current international order. Plainly stated in the preamble of the IRI's constitution: "[T]he Constitution provides the necessary basis for ensuring the continuation of the Revolution at home and abroad. In particular, in the development of international relations, the Constitution will strive with other Islamic and popular movements to prepare the way for the formation of a single world community [a]nd to assure the continuation of the struggle for the liberation of all deprived and oppressed peoples in the world."³² "According to Articles 3, 152, and 154 of the constitution, the country's foreign policy is built on an open-ended commitment" to export the Revolution "by any means possible"³³ which is also a core objective of the IRGC's founding doctrines.³⁴ For the Iranian regime, terrorism therefore is not only a tactical strategy but an openly promoted and endorsed ethic.³⁵ It is a much lauded value and theologically mandated tool³⁶ to fulfill the ideological provisions of Iran's constitution and realize the objectives of regime founder Ayatollah Khomeini, to fight a "war ... of ideology" that "does not recognize borders or geography"³⁷; to export "our revolution to the whole world"³⁸; "to confront the world with our ideology"³⁹ and to establish an Islamic state "world-wide".⁴⁰

This doctrine has been a central and dominant feature of regime policy and rhetoric whose significance is often lost on Western sensibilities regarding the import of political rhetoric in understanding Middle Eastern regimes. As noted by Elliot Cohen of the Center for Strategic and International Studies, the world-renowned Middle East expert Bernard Lewis famously and correctly observed that: "in some parts of the world, one should pay heed to what leaders say in private and not to what they say in public, but in the Middle East it is the other way around. Over the past four decades, the Iranian regime's sulfurous rhetoric about the United States has been unrelenting. It has been the underlying mood music as the regime has gone about torturing and murdering its opponents at home, impoverishing its people, and extending its sway across the broader Middle East. Deeds have followed"⁴¹

As demonstrated by Aarabi and Golkar, since 1979 both of Iran's supreme leaders – Khomeini and Khamenei – have consistently interpreted this concept to pursue militancy in their public declarations and in a multitude of policy initiatives, "on the basis of three core ideological objectives: exporting the Islamic Revolution, supporting Islamist and anti-Western movements, and eradicating Israel". Their report notes for example that Iran's Supreme leader Ayatollah Ali Khamenei "discussed this theme in 80 per cent of speeches ... the same proportion as [the regime's founder Ayatollah] Khomeini, and that sixty per cent of speeches from 2014 to 2018 by former regime President and ostensible "moderate" Hassan Rouhani, "contained pan-Islamist references highlighting support for Islamist militias abroad" Based on their research demonstrating the centrality, consistency, and pervasiveness of this ideology across the spectrum of the regime's clerical, political and military leadership⁴² – regardless of the arguably misapplied categorizations of "hardliners", "reformers" or "pragmatists" often mistakenly or inaccurately utilized in labelling various factions within the regime⁴³ – they have correctly concluded that Western policymakers have severely underestimated the extent, depth, and implications of Iran's unwavering commitment to upholding and exporting the violent ethos of Iran's revolutionary ideology.⁴⁴

4. The IRGC's Ideology/Theology of Terrorism as a Policy Consideration

a. Considering Ideology in Listing the IRGC

Policy makers must consider the basic ideological impetus driving the IRGC's terrorist behavior and intransigence, to fully appreciate the import and necessity of Western terror listings for this entity. The central role of its violent

ideology in its terrorist undertakings is a key to understanding the unique profile and gravity of the IRGC threat and modus operandi. The Guard “is a deeply ideological actor, underpinned through careful doctrinal training that seeks to nurture Shia militancy in its most violent form”.⁴⁵ It has been wittingly or unwittingly misconstrued by Western governments, often for the purpose of advancing other related policy initiatives, as “simply a hard power actor, driven by realpolitik and regime survival” whose convictions and malign behaviors could therefore be subject to mitigation given the right conditions and incentives. This failure of this analysis has been evident in Iran’s unwavering intransigence over 45 years of rejection of Western entreaties and lucrative inducements to curtail its excesses. Regime founder Ayatollah Khomeini explained the regime’s principled implacability in the clearest of terms: “The change of behavior they want ... is in fact a negation of our identity Ours is a fundamental antagonism.”⁴⁶

The listing of the IRGC as a terrorist entity which can assist the West in containing, delegitimizing, and protecting Western interests and populations from the IRGC’s ongoing predations, will be detailed later in this report. But no less importantly, a listing would enable Western countries to deprive the IRGC of its ability to fully control the narrational and propaganda arenas, which is an essential weapon and tactical objective, both domestically and abroad, of the IRI’s highly developed arsenal of soft power initiatives and contrived narrational obfuscations,⁴⁷ which are discussed at greater length in Section #3 of this paper. The centrality of narrative is critical to understanding the regime and its sensitivity to the global and domestic impact counternarratives that include terror listings that undermine it: “Khamenei asserts that global conflicts are won via the media. When defeating the enemy, he said, ‘The press has more potent influence than a missile, a drone, a warplane, and weapons in general.’ In his view, war is now a cognitive war. ‘The media influences the mind and hearts, and he who controls the media succeeds in achieving his goals whatever they are’.”⁴⁸ As such any effective policy seeking to contain Iran’s malign activity will require “calibrating the response to the IRGC – treating them as ideological terrorist actor, with the right narrative to undermine its doctrine and the right action to push back on its hard power spread across the Middle East”.⁴⁹

b. Key Ideological Concepts Underpinning IRGC’s Terrorist Behaviors

The IRGC is the embodiment of the Khomeinist tenets of the Islamic Revolution as ensconced in the IRI constitution, as promulgated by Supreme Leader Ayatollah Ali Khamenei, and as advanced systemically by the IRGC’s enhanced indoctrination programs tailored to produce the requisite ruthlessness of transnational warriors immutably committed to exporting the Islamic Revolution across the globe and destroying the Revolution’s “enemies” both within Iran and abroad. The IRGC’s strategic, operational and ideological embrace of extreme violence and terrorism stems directly from several core ideological and theological axioms which must be considered in any serious evaluation of the IRGC’s commitment to its terrorist ethos, not only as a military doctrine but as an active ingredient of its very identity. For the purpose of this memo, we will briefly outline three key elements of the IRGC catechism which collectively lay the foundations for the IRGC’s intractable commitment to global terrorism which should inform any policy considerations regarding the listing of the IRGC in its entirety as a banned terrorist entity:

- ***Velayat-e Faqih* (Guardianship/Mandate of the Islamic Jurist)**

At the very heart of the Khomeinist doctrine, enshrined in Iran’s constitution and permeating the IRGC indoctrination curriculum, is the concept of *velayat-e faqih* – “a divinely chosen infallible leader with a mandate akin to that of the Prophet and the Twelve Shia Imams.”⁵⁰ The doctrine as developed by Khomeini, “which historically been applied

to justify limited clerical guardianship over a small section of the populace: those who were vulnerable and incapable of protecting their own interests, such as widows, orphans and the disabled”,⁵¹ “marked a significant departure from traditional Shi’a custom and practice”⁵² and political quietism,⁵³ which stems “largely from the clergy’s belief that there could be no legitimate Islamic government during the occultation of the Twelfth Imam”.⁵⁴ The *velayat-e faqih* doctrine has therefore been deemed un-Islamic or heretical⁵⁵ by some prominent Shia scholars,⁵⁶ including one the most senior Shia clerics, Grand Ayatollah Abol-Qasem al-Khoei, who also denounced it as blasphemous.⁵⁷

Velayat-e faqih is an inviolable constitutional and theocratic doctrine underpinning the entirety of the Iranian regime, providing the Supreme Leader absolute authority⁵⁸ not only over the affairs of the entire Muslim *ummah* (nation) – but over “the entire world and all that exists in it, whether earthbound or flying creatures, inanimate objects, plants, animals, and anything in any way related to collective or individual human life, all human affairs, belongings, or assets”.⁵⁹ The Supreme Leader has virtually unlimited political power. He can suspend not only the constitution but even the basic principles of Islam if the interests of the Revolution requires it.⁶⁰ “Crucially, the Supreme Leader’s absolute authority was further consolidated in 2009, [at which time] “Khamenei reiterated his non-negotiable divine mandate. Opposition to the Supreme Leader was deemed to be disobedience to God”.⁶¹ In the revolutionary ideology of regime founder Ayatollah Khomeini “the goal of the IRGC ... is to promulgate and ensure the survival of the ideology of the *velayat-e faqih*”,⁶² defining safeguarding the regime as a religious duty above all duties⁶³ The inherent right and authority of the Supreme Leader’s global mandate and the IRGC’s utter commitment to that ethos is the force that underpins its terrorist exploits in exporting the Revolution across the globe. (for more on the Supreme Leader’s empowerment in Khomeinist ideology to override Islamic law and practice see Section #3-4)

- **“Exporting the Revolution”**

Loyalty to the Supreme Leader/Guardian Jurist is the primary defining precept underlying the IRGC’s malevolent weltanschauung and the organizing principle of the regime’s identity and policies. As the divinely approbated leader of a transnational Islamist movement with an apocalyptic mandate, this doctrine is the impetus and ideological justification for the IRGC’s extraterritorial violence and its ongoing brutality against the Iranian people. The IRGC’s commander Yahya Rahim Safavi, the chief commander of the IRGC between 1997 and 2007, put it succinctly and accurately: “The IRGC has no geographical border. The Islamic Revolution is the border of the IRGC.”⁶⁴

The positing of “safeguarding the regime” as a religious duty above all others, also deems relentless expansionism through any means possible as a prerequisite to the survival of the Revolution itself. As noted above by Suzanne Maloney: “Khomeini, maintained that exporting the revolution was necessary for its survival, arguing that “[i]f we remain in an enclosed environment we shall definitely face defeat.” According to Aarabi and Golkar this export of the Revolution beyond Iran’s borders was also pursued as something of an insurance policy. Khomeini repeatedly stated that safeguarding the regime “was of highest necessity among all that is required ... even fundamental religious practices”,⁶⁵ and “takes priority over all subsidiary precepts, even over praying, fasting and pilgrimage ... And [it] can abandon every commandment- both worshipping and non-worshipping precepts - which is against the expedience of Islam”.⁶⁶ Furthermore, by extending the *velayat*’s authority extraterritorially, the militia infrastructure created by the IRGC “was designed to outlive the Islamic Republic. This means that if the clerical regime collapses, the IRGC could continue to advance the militia doctrine, albeit in an insurgency mode.”⁶⁷

- **Adoption of “Offensive Jihad” to Eradicate Heresies as an Obligatory Supreme Value**

Of critical importance for Western policymakers in understanding the extremity and consistency of IRGC violence is its emphasis on the value of martyrdom and the IRGC’s approach to the concept of jihad, which “breaks with traditional Shia convention in calling for not only defensive but also offensive jihad”.⁶⁸ The concept of jihad “is one of the controversial issues of Shiite jurisprudence in the time of occultation. The original idea was that ordering offensive jihad is an exclusive right of the infallible Imam, and in his absence, Shiites can only be involved in defensive jihad.”⁶⁹ As explained by Israeli scholar and Iran expert Shmuel Bar:

The Iranian jihad doctrine has its roots in traditional Shiite doctrines of jihad and difa’ (defense). This doctrine distinguishes between the “initiated jihad” (al-jihad al-ibtida’i) and the “defensive jihad” (al-jihad al-difa’i). The former is the military struggle for spreading Islam in the world under the command of the (Hidden) Imam, and it is in abeyance pending the re-appearance of the Hidden Imam. The latter (keshwar in Farsi or defa’) is defense of the lands, faith or the honor of the Muslims or protection of the “oppressed” from infidels. This jihad is a duty for all Muslims when they face aggression. ... The concept of jihad as it is taught in the Revolutionary Guards can be construed from documents found in the hands of Hizballah in South Lebanon. ... According to these documents, jihad is not a means alone to obtain a political objective but a “pillar” of faith in itself; a “doctrine and a program of action”, through which a Muslim may “sacrifice his life for the sake of Allah and attain paradise.” It has intrinsic value as a means to test the belief of the Muslim by putting him through trials and tribulations (in emulation of the Imams Ali and Hussein) and is the path towards unity with Allah’s will The mujahid derives his power from his “revolutionary sentiment”⁷⁰

The IRGC “depicts this holy war as being not between nation-states, but between Muslims and non-Muslims, or what the textbooks refer to as *Dar al-Islam* (the land of Islam) and *Dar al-Kuffar* (the land of the disbelievers). Soldiers are taught that this holy war between Muslims and non-Muslims is permanent, until ‘*shirk* [“the act of “associating” with God, in other words, accepting the presence at His side of other divinities; it may be translated either literally, by associationism or, in more explicit fashion, by polytheism”]⁷¹ [is] removed completely from the earth’ and everyone accepts Islam. This permanent state of conflict is reflective of the language used by Ayatollah Khomeini, who asserted that: “No Muslim should think peace is ever possible between Islam and disbelief or between Muslims and the disbelievers.”⁷² This obligatory strategy configured as an offensive “jihad against the kuffar, or unbelievers” invariably justifies and demands the offensive violent export the Islamic Revolution abroad so as to extend Khomeinist doctrine across the globe. “Similar to other Islamist extremists, including Salafi-jihadi groups, the IRGC goes so far as to place a higher priority on jihad than on personal piety. Recruits are told that “some verses of the Holy Quran ... place jihad on the path of God as being more important than the Hajj [pilgrimage] and maintenance of Masjid al-Haram (the Great Mosque of Mecca)”⁷³

d. The IRGC's Escalating Radicalization

- **Mahdism as an Accelerant of IRGC Terrorism?**

“As a Shi’a Islamist force the IRGC’s worldview hinges on Mahdism: the return of the 12th divinely ordained Shi’a imam, Muhammad al-Mahdi (or the Hidden Imam), whom Shi’a Muslims believe was withdrawn into a miraculous state of occultation (hiddenness) by God in 874 CE. The concept of Mahdism is rooted in the belief that Imam Mahdi will one day return to rid the world of evil and injustice.”⁷⁴ The 1979 Islamic Revolution ... fundamentally changed the Shi’a political doctrine and Mahdism. “Rather than silently waiting for the 12th Imam’s return, Khomeini argued, the 12th Imam was waiting for Shi’a Muslims to prepare the ground for his arrival. Shi’a Muslims, in turn, had to be politically active and form an Islamic government to prepare for [the] Mahdi’s global revolution.” Under this interpretation “after the 1979 Islamic Revolution, ... with Iran’s supreme leader ruling as the 12th Imam’s deputy, the Islamic Revolution in Iran marked the first stage before the return of the 12th Imam. Preparations for the return of Mahdi became more serious after Ayatollah Khamenei assumed the mantle of supreme leader in 1989 ...”⁷⁵

The clerical regime’s increasing emphasis on Mahdism has found fertile ground in the IRGC which began to “more vocally embrace its role in preparing for Mahdi’s return”. “A point in case of the influence of the Mahdist tendency on terrorist policy” was the “strategic thinking of the head of the IRGC “Center for Strategic Studies”, Dr. Hasan Abbasi. Abbasi is also behind the regime’s “Center for Recruiting Suicide Volunteers”. Abbasi had been quoted as calling to “wipe liberal democracy off the face of the earth in order to prepare the ground for the appearance of the Hidden Imam,” and to “cut down the roots of Anglo-Saxon civilization for good.”⁷⁶

As indoctrination of the IRGC has become an increasing priority for the regime seeking to incubate a more radical IRGC generation of ideological warriors, “Mahdism has become one of the main prisms through which the IRGC ... understand the world around them and the IRGC’s actions In turn, there has been greater emphasis on viewing the IRGC as the military vehicle to prepare the foundations for the reappearance of the 12th Imam Indeed, the ideological belief that the eradication of Israel is a necessary step for the reappearance of the 12th Imam is increasingly being mainstreamed in the IRGC.” “This ideological conviction helped to convince large numbers of young IRGC and Basij volunteers, as well as transnational Shi’a fighters, to pick up arms for the Islamic Republic’s intervention in the Syrian civil war.” In practical terms, “not accepting and rejecting” the liberal international rule-based order ... is presented as one of the actionable measures to pave the way for the reappearance of Mahdi. Against this backdrop, the IRGC’s actions – from regional destabilization to disrupting the international system and its militia network – are being understood ... as part of the plan to prepare for the return of Mahdi. Likewise, the Guard’s permanent conflict with America is increasingly being tied to preparing for Mahdi’s emergence”⁷⁷

The accelerating influence of Mahdism within the IRGC “could have major implications for the Islamic Republic’s militia network, ballistic missile program, and even its nuclear program”⁷⁸ and should be configured into any Western attempts at curtailing the IRGC’s malevolent behaviours as a threat to Western interests.

5. The IRI/IRGC Prioritizes Terrorism and the Islamic Revolution Over “National Interest”

45 Years of Unwavering Consistency in Supporting Terror

Any presumption by Canada that avoiding an IRGC terror listing Canada will curry any diplomatic favour in the eyes of the regime is unfounded. The Iranian regime has been unfailingly consistent in the pursuit of its terrorist foreign policy. Regardless of successive generations of Western leaders offering and providing the regime incentives to mitigate its malign activities in exchange for extraordinary lucrative national benefits, the IRI has proven intransigent in its support of the export of the Revolution as a supreme and overstriding value and policy.

Iran expert and journalist Amir Taheri, provides a concise history of failed Western attempts at enticements and reconciliation with the regime, in his book *The Persian Night*. Taheri describes European policies of “constructive engagement”⁷⁹ and “critical dialogue”⁸⁰ in which Europe which sought to modify Iranian behavior through the lure of profits which were indeed lucrative for Tehran and did produce an ostensible “dialogue” in which “the mullahs promised not to conduct terrorism in Europe. They broke their pledge by launching attacks, including assassinations in Austria, France, Britain, Germany, Italy, and Switzerland. They also promised not to seize more European hostages but went on doing so regardless”.⁸¹ Taheri chronicles the failed entreaties of multiple American presidents who fared no better. President Clinton for instance, sought forgiveness from Ayatollah Khomeini “for the crimes the US committed against Iran and its people”⁸² but was ineffective, as was President George Bush Sr.’s earlier offer – to forge a new beginning with Iran by “wiping the slate clean” dismissed by Ali Khamenei (now Iran’s Supreme Leader) who told the President “You have nothing to say to us! We object It is up to us to set conditions”⁸³ More recently despite compelling overarching offers and concessions from Presidents Obama and now President Biden, the regime’s resolve has been unshakable. The Biden administration’s recent accedance to providing billions in Iranian sanctions relief despite Iran’s ongoing deadly attacks on American forces in the region,⁸⁴ seems to have had no impact in mitigating Iran’s recent behaviors in attacking American interests or in the context of the October 7 attacks.

The plethora of apologies and incentives proffered by the international community has consistently been met with terrorism, brinkmanship and contempt from the Islamic Republic. To adopt a metaphor from President Obama’s second inaugural speech, every open hand to Iran has been consistently met with a clenched fist.⁸⁵ Walter Mead summed it up bluntly in an October 2023 opinion piece in the Wall Street Journal: “Iran is unappeasable It does not seek compromise or accommodation. It does not want its interests respected or its grievances redressed. It wants what it says it wants: a holocaust in Israel and the destruction of the U.S.”⁸⁶

This is what sets the IRI and the IRGC apart from other totalitarian states and sponsors of terror. As Iran expert Amir Taheri has noted, these other regimes do not define themselves as the embodiment of a divinely sanctioned inviolable “cause,” mandated “to smash all other state structures” and to force all humanity to adopt their belief systems. However reprehensible their behaviors, other totalitarian states do not actively embrace the destruction of the global community and the eradication of all other systems of religious belief as a national goal above other state interests. But for the Islamic Republic, this remains and must remain the publicly declared theological imperative, regardless of how many concessions and accommodations have been made or will be offered.

- **“Iran is Not a Normal Country”**

Kian Tajbakhsh, Senior Advisor, at Global Centers Columbia University, who was also a former prisoner in Iran’s notorious Evin Prison, is one of many scholars who have warned about the principled intransigence and duplicity of the Iranian regime, arguing that “the misconception that the Iranian regime, despite its tough facade, is a status quo power aiming for peaceful coexistence with the West and its allies” and that Iran should “be viewed as a “normal” country”⁸⁷ driven primarily by pragmatic interests,⁸⁸ “has long hindered a true understanding of its nature” Tajbakhsh further explains that the regime “prides itself on being a revolutionary state (or “revisionist,” in the foreign-policy jargon), driven by Islamist ideology ... [that] has been willing to forgo the enormous economic benefits it could have received if it joined the international global market. It has been more than willing to provoke the West into imposing sanctions, and then to suffer under them, in the name of preserving its anti-American posture and “revolutionary” credentials Iran is a master of flexible tactics but has never wavered from its commitment to the goals of the 1979 Islamic revolution that put it in power.”⁸⁹

- **The Regime’s “Priority Has Never Been about Iran’s National Interest”**

Iran expert Karim Sadjadpour concurs, explaining that Ayatollah Khamenei also contends that the regime’s “priority has never been about Iran’s national interest”⁹⁰ And in this regard the IRI’s track record speaks for itself. Tehran has made itself unabashedly clear since 1979, that it will not reciprocate or moderate its fundamental positions despite exceedingly generous offers from the international community.⁹¹ Iran and the IRGC have consistently responded to such initiatives with ever greater malevolence. The potential loss of huge profits for the regime has never impeded the IRGC and its associates from pursuing the most malevolent policies against its ostensible partners. As noted by Prof. Payam Akhavan of McGill University and a member of the Permanent Court of Arbitration at the Hague: “Until very recently, Iran’s biggest trading partner was the EU. ... in the ‘80s and ‘90s more than 200 Iranian dissidents were assassinated in the streets of Berlin and Paris and very rarely was the Iranian government held to account.”⁹²

Iran expert Mehdi Khalaji of the Washington Institute makes a similar point with regard to the renewed policies and execution of Iranian assassination attempts abroad: “The regime is once again targeting dissidents in Europe and arresting dual nationals, giving Washington and the EU common cause to sanction senior Iranian officials.” “For years, many observers assumed that Iran had largely abandoned its agenda of killing dissidents abroad in order to build trust with the West and normalize relations with the international community. But these and other incidents show that the regime has been intently pursuing foreign assassination plots again for some time, in tandem with domestic maneuvers intended to ward off persistent political protests and intensified media pressure at home.”⁹³ The IRGC has been instrumental and unabashedly clear about its own involvement in these assassination campaigns and in the incarceration of dual nationals including Canadian citizens.⁹⁴

Under the much-vaunted Iran nuclear deal known as the Joint Comprehensive Plan of Action (JCPOA) in 2016 in which Iran received \$100 billion in sanctions relief,⁹⁵ Iran was provided with an opportunity to further its interests and standing by demonstrating some semblance of good will or minimal even cosmetic flexibility on issues related to human rights and terrorism, that have been at the core of Western concerns regarding the regime. One might have expected the regime to capitalize on the thaw and open a profitable new page with countries willing to largely forgive and forget the brutality that has characterized the Islamic Republic since it was founded. But Iran responded as it always has to Western gestures – with greater regional belligerence; more executions; more amputations; and more vitriol towards Iran’s minorities. The regime’s vast industry of atrocities with the

IRGC leading the effort, including the execution of juveniles and members of the LBGTQ community only expanded since nuclear sanctions were lifted under the JCPOA.⁹⁶

In the immediate aftermath of the launch of the JCPOA, the IRGC expanded its operations in the UK, Europe, and the U.S. and the IRGC's support of terrorism only increased⁹⁷ as did other its malign activities including the development, support and arming of regional terrorist organizations,⁹⁸ ballistic missile development; and the taking of dual-nationals as hostages.⁹⁹

The regime's support of the Assad regime and Iran's proxies in Syria also remained interrupted if not enhanced since the deal was signed. "In 2018, the U.S. State Department reported that since 2012, Iran had provided \$16 billion for the Assad regime and "partners and proxies in Syria, Iraq, and Yemen." A member of Iran's parliament reported in 2020 that since 2011, the country had provided between \$20-30 billion to Syria. According to a 2020 Atlantic Council report, estimates of "military and economic spending in Syria range from \$30 billion to \$105 billion in the first seven years" of the war alone. Although it is difficult to find estimates about funding to proxies specifically, as mentioned previously various reports indicate Tehran has spent between \$5 and \$15 billion on its projects in Syria each year, including proxies."¹⁰⁰ Reports have indicated that an estimated 80,000 Shia foreign fighters that were recruited and trained by the IRGC had travelled to fight in Syria.¹⁰¹

Another relevant example of the IRGC's belligerence in response to hitting the JCPOA's multi-billion-dollar jackpot was in the autumn of 2015. "Months after the signing of the JCPOA, MI5 and the Metropolitan Police Counter Terrorism Command had uncovered an operation in which terrorists connected to Iran and Hezbollah were caught stockpiling explosives in north-west London. Hezbollah was ultimately proscribed four years later in 2019, but at the time the Rt Hon David Cameron MP and the Rt Hon Theresa May MP, then Prime Minister and Home Secretary, knew of the discovery and kept the information hidden from MPs and the public, ostensibly to not disrupt progress on the newly formed JCPOA."¹⁰²

In short, the IRGC's self-declared aspirations, appetites, and track record of terrorist endeavour has demonstrated clearly that it cannot and will not, be mitigated by conciliatory diplomatic initiatives by Canada or the West, and thus represents an ongoing and implacable terrorist threat to Canada and other countries. Experts Vahid Nick Pay and Andrew Omand who have researched the IRGC's ideological frameworks have also concluded that: "All evidence presented in this study corroborates this study's hypothesis that the IRGC's ideologically driven policies, both inside Iran and abroad, do not show the slightest sign of moderation and have even further radicalised in recent years. Domestically, the IRGC's violent repression has been incessant. Internationally, numerous pieces of research, articles, intelligence documents and leaked IRGC internal communications provide evidence for plots to physically eliminate activists, journalists and other serving and former state authorities."¹⁰³

As noted by terrorism expert Matthew Levitt in *Trends in Iranian External Assassination, Surveillance, and Abduction Plots*, Iran has a long history of constantly targeting dissidents, Western opponents, Israelis, and Jews in assassination plots and abduction plots over the years "including at times and in places *where carrying out such operations could undermine key Iranian diplomatic efforts, such as negotiations over the country's nuclear program.*"¹⁰⁴

The IRGC, the Supreme Leader's vanguard,¹⁰⁵ is most committed to the regime's violent and fundamentally intransigent transnational terrorist ideology described above.¹⁰⁶ It has defined terrorist activity as essential not only to its very identity but to its survival. IRGC chief Mohammad Jafari acknowledged this in a speech on

January 30, 2017, that “unconventional defense” of the revolution's “dynamic movement forward” later declaring that the IRGC's “very survival depended on timely ‘revolutionary actions’ such as the periodic seizure of Western sailors in the Gulf” Maj. Gen. Mohammad Bagheri, the head of Iran's Armed Forces General Staff, echoed Jafari's preference for in a message released April 29, 2017. In other words, a permanent cessation of IRGC terrorist actions would “represent a sharp divergence from the doctrine put forth by both Khamenei and the IRGC's senior leadership. It would also imply that the IRGC is foregoing the aggressive offensive posture upon which its institutional psyche is grounded at the strategic level.”¹⁰⁷

Iran has therefore mistakenly been treated by the West as an “ordinary” totalitarian state that can be traded with, bargained with, flattered, bribed or cajoled into forsaking excesses or principles, and in doing so the international community has bestowed a degree of legitimacy upon this regime’s narrative regarding the West and the inevitable ascendance of the Islamic Revolution that has only emboldened it. Iran has felt free to continue its pursuit of unconventional weapons and “unconventional defense”, while the West continues to be constrained by conventional diplomatic strategies while assiduously avoiding a terror listing for the IRGC – the regime’s central architect of its terrorist policies and the backbone of its escalating intractability.

6. The IRGC is Iran’s Primary Instrument for Implementing a Transnational Terrorist Agenda

As we will demonstrate in this memo, the Guard since its founding and in its entirety was mandated and established by the regime as Iran’s primary instrument for implementing its transnational terrorist agenda, by supporting, facilitating and participating in terrorist activity and sponsorship. From its inception, the IRGC was not established by the regime as a military force but as an “ideological army”¹⁰⁸ specifically mandated constitutionally and in the IRGC’s mission statements to protect and export Ayatollah Khomeini’s Islamic Revolution. The IRGC is a deeply radicalized entity¹⁰⁹ committed to a violent apocalyptic ideology, whose stated allegiance as we will explain in Section #3, is not to the territorial integrity of Iran as a nation state, but to the transnational tenets of Khomeinist ideology and the export the Islamic Revolution across the globe. The Guard is the backbone of that enterprise and as noted in Jane’s Weekly, the listing of the IRGC as a terrorist entity “represents a fatal risk”¹¹⁰ to the regime. Iran’s current Supreme Leader Ali Khamenei seems to concur with Jane’s evaluation, stating that: “Today the IRGC has a determining effect on all international political balances and calculations If one day this Corps ceases to exist in our society, the authority of our Islamic Revolution shall collapse.”¹¹¹ Ayatollah Ahmad Jannati, a close ally of Khamenei, also concurs stating “if the IRGC did not exist, the revolution, Islamic Republic and Islam, too, would not exist”.¹¹²

7. The IRGC’s Terrorist Credentials Are Undisputed

- The IRGC’s credentials as a terrorist organization are undisputed. The Guard is a leading innovator in terrorist statecraft, which constitutes the cornerstone of its indefatigable efforts to export the Islamic Revolution “to the four corners of the earth.”¹¹³ Its multi-billion-dollar¹¹⁴ terrorist framework, responsible for sponsoring, creating, and enabling scores of terrorist organizations and “militias” on multiple continents¹¹⁵ has been extensively mapped by experts and is a matter of public record.
- The IRGC’s terrorist exploits and atrocities have rivaled or exceeded those of most, if not all, of the terrorist organizations presently listed by Canada as banned terrorist entities.¹¹⁶ The Guard is at the strategic and tactical

core of what experts have termed the “Iran Threat Network” (ITN).¹¹⁷ The ITN, as described by the Center for Strategic and International Studies (CSIS), “consists of a network of government and nongovernmental organizations that are involved in crafting and implementing the covert elements of Iran’s foreign policy agenda, from terrorism, political, economic, and social subversion; to illicit finance and weapons trafficking; and nuclear procurement and proliferation.”¹¹⁸ Its tactical portfolio consists of terrorist exploits in more than 40 countries targeting diplomatic and civilian targets, hostage-taking, maritime piracy, assassinations,¹¹⁹ transnational repression, and organized criminal endeavors across the globe.¹²⁰

- The IRGC is now utilizing its terrorist capacities in assisting Russia to direct drones into Ukrainian civilian infrastructure and murdering Ukrainian civilians.¹²¹
- Of particular note is the central and critical role¹²² the IRGC plays in Iran’s illicit nuclear arms program. As reported in February 2024 by the Institute for Science and International Security,¹²³ the regime is now precariously close to its goal of adding nuclear weapons capabilities to its arsenal¹²⁴ in its pursuit of hegemony across the Islamic world; in its ideological confrontation with the West; and its realization of its declared genocidal intention of eradicating Israel. As Suzanne Maloney cautions in *Foreign Affairs*, this “clamor” for the destructions of Israel and for the “triumph of the Islamic world over what it sees as a West in decline” are “not opportunistic or transient; anti-Americanism and antipathy toward Israel are ingrained in the Islamic Republic’s bedrock.”¹²⁵ The annihilation of the Jewish State is a foundational regime precept “entrenched across the Iranian establishment”,¹²⁶ that must be taken with the utmost seriousness by Western lawmakers in evaluating gravity of the threat posed by the IRGC.¹²⁷ This genocidal invective appears unambiguously on the website of the regime’s Supreme Leader Ali Khamenei stating that there is religious “justification to kill all the Jews and annihilate Israel, and Iran must take the helm.”¹²⁸ The unrelenting hostility to the continued existence of the Jewish State is a “defining ideological principle”¹²⁹ that has been referenced in various formulations by Ayatollah Khamenei in 90 percent of his speeches since becoming Supreme Leader in 1989.¹³⁰
- The IRGC’s global capacities are enabled by its vast wealth and power. As noted in 2021 by former Iranian Foreign Minister Zarif¹³¹ and a host of Iran experts, the IRGC has also become the dominant political force in Iran “free to shape the country’s policy orientation as they wish”,¹³² while also controlling a vast criminal¹³³ and financial empire accounting estimated by “some western sources estimated ... to be around one to two thirds of Iran’s GDP.”¹³⁴

8. The Pernicious “Inclusivity” of IRGC Terrorist Doctrine

As noted above by Suzanne Maloney of the Brookings Institution: “The ideology that shaped Iran’s post-revolutionary state was explicitly universalist”¹³⁵ She is correct. Iran scholars Ali Ansari and Kasra Aarabi explain that Khomeini’s ideas and language amalgamated a certain retooled conceptual far-left universalism with far-right Shia supremacism creating a form of Islamist extremism that could appeal to far-left and to far-right audiences well beyond the confines of the Islamic world. Khomeini’s emphasis on what has been described as a type of “liberation theology”,¹³⁶ built on a binary division of the world into “oppressed” and “oppressors” combined with his obsessive hatred of the U.S. and other Western countries and entities as colonialist usurpers, and his antisemitic/antizionist convictions, reverberated powerfully abroad.¹³⁷ Iran scholar Saeid Golkar describes the foreign appeal of this

ideological mix: “Since its creation in 1979, the Islamic Republic's ideology has attracted many groups ranging from Islamists to leftist activists and postcolonial intellectuals, who saw the 1979 Islamic revolution as an “anti-hegemonic,” “anti-dictatorial”, and “postmodern revolution”.¹³⁸ Khomeini was immediately beatified by these foreign “infidel” supporters upon coming to power, with one leading American diplomat for instance casting him as a “Ghandi” while Richard Falk, who later became a U.N. special rapporteur was quoted in a New York Times article titled “Trusting Khomeini”,¹³⁹ as concluding that the Ayatollah was “a desperately-needed model of humane governance for a third-world country”.¹⁴⁰

Khomeini himself stressed the uniqueness of his particular brand of Islamist “universalism” on a number of occasions: “I have said time and time again that to build a society on the basis of the principles of Islam is an ideological choice, not just a religious one. Islam in fact is an ideology, in which religion represents one aspect.”

This breadth of ideological reach helped set the stage for the regime’s ascendance as the world’s most egregious state sponsor of terrorism that stretches well beyond the Islamic context. For despite its commitment to Khomeini’s version of apocalyptic Shiite supremacism,¹⁴¹ the IRI/IRGC terrorist ethos is distinguished by a malign “inclusivity” and largesse favoring the Revolution’s interests over religious affiliation.¹⁴² So despite its violent disdain of those who do not share its ideological convictions, its unwavering commitment to Khomeinist ideology, and a clear predilection for mobilizing the Shia world in particular, the IRGC has not limited its support only to terrorist entities embracing Khomeinist theology. It has in fact supported foreign regimes and violent extremists and terrorist organizations ascribing to almost any ideological hue, Islamic or otherwise, that target the West or the regime’s foes.¹⁴³ Over the last few decades Tehran hosted the offices of more than three dozen highly diverse terrorist organizations including FARC, Hamas and Leninist and Trotskyite groups, and has also financed extreme right-wing and left-wing anti-American terrorism in Europe and the Americas.¹⁴⁴ Concomitantly the IRGC has not hesitated to repress, execute and slaughter large numbers of Muslims deemed oppositional or threatening to the regime’s interests or ideology.¹⁴⁵

9. IRGC Terrorism is a Regime Budgeting Priority

The IRI/IRGC commitment to terrorist diplomacy is reflected in the regime’s budgeting over the last four decades, prioritizing tens of billions of dollars for funding international terrorism¹⁴⁶ as an ideological and constitutional imperative,¹⁴⁷ despite the needs of its crippled economy and the severity of its endemic self-inflicted economic hardship. “The precedence of the regime’s ideological interests over the domestic national interest is consistent with Khomeini’s call for the Iranian population to “endure hardships and pressures” and allow the country’s officials to “carry out their main obligation, which is to spread Islam across the world”.¹⁴⁸ The regime therefore continues to prioritize the funding of the IRGC which in 2021 accounted for 34% of Iran’s military spending.¹⁴⁹ In 2022, the IRGC’s budget “was doubled compared to last year and currently stands at \$22 billion. In comparison, only \$8 billion was allocated to [Iran’s] regular army, even though the IRGC constitutes only 10 percent of the entire armed forces in Iran.”¹⁵⁰ These figures do not reflect the billions of dollars of supplementary revenue coming from the IRGC’s economic empire as the “most powerful controller of all important economic sectors across Iran”¹⁵¹ described as ideologically-infused “business conglomerate independent of state regulation”¹⁵², estimated by some western sources, to control between a third to two thirds of Iran’s GDP”;¹⁵³ its control of multi-billion-dollar religious endowments; and its domination of Iran’s vast illicit economy. But “the true amount of its revenues is unknown and is not supervised by any public agency.”¹⁵⁴

10. The IRGC and Transnational Organized Crime

- **The “Crime-Terror Nexus” is the Face of 21st Century Crime**

The “crime-terror nexus” refers to the new hybridization or convergence of terrorism and transnational organized crime. This phenomenon has become a subject of extensive research and policy development over the last years, and a full explication of this emerging construct is beyond the scope of this paper. To briefly summarize, the crime-terror nexus has been described as “the face of 21st century crime”.¹⁵⁵ The threat it poses has significant geo-political implications and is a component of what analysts have described as fourth generation, fifth generation and hybrid warfare.¹⁵⁶

There are many definitions of hybrid and new generation warfare and these definitions continue to evolve, but a few examples will be provided to convey the import of the threat. The U.S. Joint Military Command considers the hybrid threat as “any adversary that simultaneously and adaptively employs a fused mix of conventional weapons, irregular tactics, terrorism and criminal behavior in the battle space to obtain desired political objectives”.¹⁵⁷ “According to Navy Lieutenant-Commander Keenan, Transnational Criminal Organizations ... , Drug Trafficking Organizations ... , and Islamic extremists forming a transnational, ‘trifecta’ threat in which they each participate in an ever-developing mode of conflict called fourth generation warfare (4GW)”.¹⁵⁸ 4GW is characterized by insurgency¹⁵⁹ and “a return to decentralized framework of warfare and a blurring of lines between war and politics, combatants and civilians ...”¹⁶⁰ Fifth Generation Warfare (5GW) involves “conflict between identity-based groups, which broadly includes cultural, social, economic conflict. This can be seen as warfare designed to end democracy. It is not aimed at the state, but is focused on the erosion of state institutions, and weakening the bonds that hold states together”.¹⁶¹ “New generation warfare emphasizes the use of nonkinetic techniques that promote social upheaval and create a climate of collapse.”¹⁶²

As noted by Michael Braun, a former director of operations for the DEA: “These ‘hybrid’ organizations – part terrorist group, part organized crime network – are “meaner and uglier than anything law enforcement or militaries have ever faced.”¹⁶³ Prof. Celine B. Realuyo at the William J. Perry Center for Hemispheric Defense Studies at the National Defense University concurs stating that: “With globalization, terrorists and criminal groups have internationalized their support and operations, brokered formidable alliances, and present complex transnational threats that put security and prosperity at risk around the world.”¹⁶⁴ In a similar vein, David Aufhauser, the former General Counsel of the U.S. Treasury Department, described the danger of the growing ties between drugs and terrorism as “an unholy alliance between common pedestrian crime ... and acts of terror that can literally topple governments ...”¹⁶⁵ Moisés Naim, a distinguished fellow of the Carnegie Endowment for International Peace succinctly describes the corrosive global impact of this Crime-Terror black economy in his book *Illicit*:

Ultimately, it is the fabric of society that is at stake. Global illicit trade is sinking entire industries while boosting others, ravaging countries and sparking booms, making and breaking political careers, destabilizing some countries while propping up others ... International terrorism, the spread of horrific weapons, the empowerment of “rogue regimes.” The flare-up and persistence of regional wars and ethnic violence, the thread of environmental depredation, the stability of the world financial system, the fierce pressures and aspirations of international migration – all of these and more find their outlet, their manifestation and often their sustenance in global illicit trade.¹⁶⁶

11. The IRGC and Narcoterrorism

The IRGC and its terrorist proxies are a paradigmatic model of the crime-terror nexus. Its criminal-terrorist endeavours represent a threat to the sovereignty and security of Canada and to any of the countries in which they are conducted.¹⁶⁷ The Guard controls Iran's domestic black market economy estimated to generate between \$100 and \$140 billion per year, allowing the IRGC to expand its criminal and operational capacities across the globe.¹⁶⁸ It now plays a leading role in multiple arenas of illicit exploit, founded on its extensive relationships with cartels and transnational criminal organizations.¹⁶⁹ Hezbollah for instance, as the flagship terrorist entity of its IRGC patron and an "operational arm" of the regime, is considered "one of the largest and most sophisticated global criminal operations in the world",¹⁷⁰ and notably in October 2018 the U.S. Department of Justice designated Hezbollah amongst five of the largest transnational criminal organizations,¹⁷¹ "naming Hezbollah alongside three major Mexican cartels and the Central American gang MS-13".¹⁷² This nexus between IRGC proxies such as Hezbollah, Palestinian Islamic Jihad, the Houthis,¹⁷³ various Iraqi militias,¹⁷⁴ and transnational crime enables the IRGC to utilize transnational crime networks to circumvent sanctions and advance its terrorist and ideological agenda in foreign and particularly Western countries. On February 2, 2024, the U.S. Department of Justice "announced several terrorism and sanctions-evasion charges and seizures linked to illicit Iranian billion-dollar global oil trafficking Network that finances Iran's IRGC, and its Qods Force, and its malign activities, and for cultivating and providing lethal support to terrorist organizations abroad."¹⁷⁵ As described in recent report by the International Coalition Against Illicit Economies (ICAIE):

"Criminal activities in Iran are mainly carried out by state-embedded actors and criminal networks" with the IRGC continuing to strengthen strong alliances with criminal and terrorist organizations both within Iran and internationally: According to the Organized Crime 2023 Index ... Global Initiative Against Transnational Organized Crime (GITOC), other Iranian cross-border illicit activities advanced by the IRGC and Iranian criminal groups include human trafficking primarily involving sex trafficking, forced labor and the recruitment of child soldiers as Iran is geographically located along one of the main human trafficking routes in the region, with young women being trafficked from Asia into Europe and the Gulf; and arms trafficking to countries in Western Asia, as well as North Africa and Russia. years.¹⁷⁶

The Ideology, Import, and Impact of IRGC Narco-terrorism

- In particular, as discussed above the IRGC, Hezbollah and other terrorist proxies sponsored by the regime have emerged as a major narcoterrorism force generating billions in illicit profits and inflicting trillions of dollars of narcotics-related damage on Canada and other western countries.¹⁷⁷
- The illicit global drug trade, with approximately 300 million people globally using illegal narcotics,¹⁷⁸ is estimated to generate approximately \$650 billion USD annually from the criminal-terrorist underworld.¹⁷⁹ The IRGC now plays a leading role in this criminal ecosystem. Its entrenchment in global narcoterrorism, both directly and through its terrorist proxies¹⁸⁰ including the Houthis¹⁸¹ and Hezbollah¹⁸² is founded on its extensive relationships with cartels and transnational criminal origins across the globe.
- As described by Pablo Casaca of the South Asia Democratic Forum (SADF): "The illegal drug trade is not managed by stray members of Iran's state apparatus, it is a core interest and a central element of its policy. Research shows that the so-called anti-drug campaign promoted by Iran's security agencies is not aimed at

eradicating drug trade production and consumption; it is used to ruthlessly eliminate competing actors in the drug business, and sometimes to eliminate political opposition and to suppress ethnic and religious minorities.”¹⁸³

- Despite executing hundreds of people each year for drug trafficking and possession, a 2011 article published in The Times exposed the central role of the IRGC in drug trafficking in Iran and abroad, reporting that Iran uses “the multibillion-pound trade to establish links with a global crime network and further its goal of undermining the West, according to former regime officials.”¹⁸⁴ In a similar vein, a confidential UN report published by WikiLeaks quoting the report of the American Embassy in Baku in May 2009, went so far as to describe “Iran’s government” as “the biggest drug trafficker in the world.”¹⁸⁵ A report of the United Nations Office of Counter Narcotics shows that “about 40% of the drugs imported into Iran remain in this country, and the remaining 60% go to Iraq, Turkey, Azerbaijan and finally to Europe”.¹⁸⁶ “Iran’s strategic location makes it the starting point of the world’s major heroin trade routes, which transport the drug to Russia, Western Europe, and the United States. UNODC estimates that about 140 tons of heroin – 87% of the Afghani heroin trade - is transported through Iran annually, as smugglers consider it the main ‘trafficking hub’.”¹⁸⁷
- The IRGC is at the center of this effort. Dr. Amir Hamidi a special agent in “Project Cassandra,” a secret investigation project by the DEA on the smuggling and money laundering activities of Hezbollah which began in 2008, contends that drug trafficking is one of the main sources of income for the IRGC.¹⁸⁸ The drug trade enables the IRGC to circumvent sanctions, and generate billions to fund the regime’s nuclear, terrorist, and criminal activities,¹⁸⁹ while simultaneously utilizing its nexus with transnational organized crime to improve the IRGC’s global capabilities creating “operational and logistical platforms that support and enhance the ability of the Revolutionary Guard ... to pose a threat to their enemies’ territories and populations by forging documents, smuggling goods across borders, laundering money, supporting black banking” etc.¹⁹⁰
- The illicit narcotics industry is also seen by the IRGC as a potent weapon against the West inflicting hundreds of billions of dollars¹⁹¹ of narcotics-related damages on Canada¹⁹² and other democratic countries, by weaponizing illegal narcotics “to poison the populations of Western countries ... According to Iran, which officially opposes drug usage for religious reasons, drug distribution in these countries will damage their society, create economic hardship, increase welfare costs, and diminish national resilience.”¹⁹³ The Times quotes Abolfasl Eslami, who worked as a diplomat for the Iranian Foreign Ministry for 21 years before defecting in 2006, regarding the IRGC’s interest in the drug trade stretching back decades: “In 1996, he and other diplomats were taken to a warehouse outside Tehran for an IRGC briefing. They were shown narcotics seized on the Afghan border. It was claimed that these drugs were burnt in front of United Nations inspectors. “Afterwards we had a private talk with the IRGC and asked if they really burnt it all. They were laughing. They said: ‘This is a small show for the UN. It is big business for us,’ ... We were told drugs would f*** up the sons and daughters of the West. We should kill them. Their lives are worth less because they are not Muslims.”¹⁹⁴ As summarized in a report by the Institute for National Security Studies (INSS) at Tel Aviv University:

Drugs are also used by the Revolutionary Guards as weapons against Western nations and their allies, as they are destructive to society, break the nuclear family, damage youth, strengthen organized crime, cause increased violence, decrease the sense of personal safety, and exert pressure on welfare and law enforcement agencies. The state is then forced to allocate a great deal of money and manpower to combat these phenomena. According to the testimony of an Iranian defector and a former member of the Revolutionary Guards, “We were told that the drugs will destroy the sons and daughters of the West, and that we must kill them. Their lives are worth less because they are not Muslims.”¹⁹⁵

12. The IRGC Recruits and Trains Child Terrorists

What is the IRGC's Basij Militia?

The Organization for Mobilization of the Oppressed, known as the Basij, was formed in 1979 and acts as a domestic volunteer militia under the auspices of the IRGC. The Basij has played an integral role in carrying out the regime's more public and brutal activities, including storming foreign embassies, crushing domestic dissent, targeting dissidents and ethnic and religious minorities,¹⁹⁶ committing acts of extreme physical and sexual violence against children¹⁹⁷ and women,¹⁹⁸ and ruthlessly enforcing regime edicts.¹⁹⁹

The Basij provides the regime with an added "layer of surveillance, effectively operating as its 'eyes and ears' across all sectors of Iranian society".²⁰⁰ Today, while official statistics claim membership of the Basij stands at 22 million, Golkar and Aarabi estimate the actual figure to be closer to around five million,²⁰¹ "though only about 100,000 to 200,000 serve as full-time, active duty, and paid personnel".²⁰² "The Basij has a presence in virtually every occupational sector in Iran."²⁰³ "Some 50,000 branches of the Basij operate in the country's 31 provinces, with a presence in mosques, government offices, factories, hospitals, schools, and universities."²⁰⁴

Membership of the Basij is not without many benefits. "... Basijis often receive state benefits and privileges. As an example, 40 per cent of private university places for those who wish to study law in Iran are reserved for members of the Basij, and during Mahmoud Ahmadinejad's presidency (2005-2013) this was also implemented across national universities. In essence, this model mimics a networking club, with Basijis expected to help fellow members. This has effectively created what is sometimes referred to as a 'deep society', where the Basij effectively operates as a privileged class that acts as a law unto itself."²⁰⁵

The Basij has become the IRGC's regime's incubator for future recruits starting to groom children in grade school, some as young as 12 years old,²⁰⁶ for a future career in service of the regime's terrorist agenda: "One of the most important Basij associations is the Pupil Basij Organization (PBO), which mobilizes schoolchildren. In its own words, the PBO seeks 'to nurture a generation of revolutionaries in schools'. To do this, the PBO has a presence across schools in Iran, including primary, middle and high schools. Children as young as seven years old can volunteer to join the Basij. Membership requires children to participate in camps where members of the IRGC will provide them with ideological-political as well as military training, including firearms drills."

The IRGC's Basij militia has also been a central accomplice in recruiting, training, and deploying child soldiers to fight in conflicts across the region. On October 16, 2018, the U.S. Department of the Treasury's Office of Foreign Assets Control (OFAC) enacted sanctions against the "vast network of businesses providing financial support to the Basij Resistance Force (Basij), "a paramilitary force subordinate to Iran's Islamic Revolutionary Guard Corps (IRGC)" for its malign activities including recruiting, training and deploying child soldiers "to fight in IRGC-fueled conflicts across the region".²⁰⁷ The Treasury Department stated that "in addition to its involvement in violent crackdowns and serious human rights abuses in Iran, the Basij recruits and trains fighters for the IRGC-QF, including Iranian children, who then deploy to Syria to support the brutal Assad regime. Since at least early 2015, the Basij has recruited and provided combat training to fighters before placing them on a waiting list for deployment to Syria. In addition to Iranian nationals, the Basij also recruits Afghan immigrants to Iran, including children as young as 14-years-old, to join the Fatemiyoun Brigade, a militia made up of Afghan fighters under the control of the IRGC-QF in Syria. Some of these Afghan recruits, reportedly coerced to fight on the side of the Assad regime in Syria"²⁰⁸ "This Iran-based network is known as Bonyad Taavon Basij, which is translated as Basij Cooperative Foundation,

and is comprised of at least 20 corporations and financial institutions. The Bonyad Taavon Basij employs shell companies and other measures to mask Basij ownership and control over a variety of multibillion-dollar business interests”²⁰⁹

Since 2010 more than 70 percent of draftees in the IRGC have been active members of the Basij. In Iran’s major cities, where demand for IRGC military services is higher than elsewhere, this has even reached 100 percent of draftees. Therefore, since 2010, we know that at least 70 percent of the IRGC’s 50,000 conscripts are ideologically aligned to the Guard as they were already proactively affiliated via the Basij.”²¹⁰

But the regime’s efforts at recruiting children are not limited to the Basij. In March 2024, Human Rights Activists (HRA) released an extensive report detailing longstanding practice of Iran and the IRGC of “recruiting the economically disadvantaged segments of society, including asylum seekers, immigrants, and using child soldiers in armed conflicts,”²¹¹ which is only the latest exposé of this malign illegal practice.²¹² “Former U.S. ambassador to the United Nations Nikki Hailey noted in 2018 that Tehran had produced many films and television shows to recruit children. Those IRGC-produced films encourage boys to become “the protectors of the holy places” in Syria. Similarly, the Islamic State recruits boys to become “Cubs of the Caliphate.” Children in both societies are raised in aggressive environments and trained in weapons use early in their adolescence.”²¹³ According to Iran scholar Saeid Golkar Iran is also recruiting youth in North America “... through financing and managing mosques and religious centers, Iran appoints imams and promotes the Shia Islamist view. Especially through funding religious trips to Mecca, Iraq, Syria, and Iran, these Islamic centers are recruiting, indoctrinating, and mobilizing Shia Muslims as their agents for exerting the Islamic Republic’s soft power. At other centers, children are taught the IRGC-linked anthem titled “Salam Farmande” (“Salute Commander”), whereby they declare their preparedness to become soldiers and martyrs. These centers have also made it possible for Muslim youth to study in Iranian universities and seminaries, including Al Mustafa University. Later, security and intelligence bodies, including the IRGC ... Quds force, recruited some of these students, arming them with the ideological tools to defend Shia Islamism and propagate its message in public, media, and academia”.²¹⁴

13. IRGC Terrorism in Ukraine

The IRGC has now brought its terrorist talents to Ukraine, providing Moscow with drones and assisting Russia in directing drones into civilian infrastructure and murdering Ukrainian civilians²¹⁵ which constitutes an act of terrorism under Canada’s *Criminal Code*. As noted by Iran specialist Emanuele Ottolenghi: “The supply chain of Iranian drones to Russia’s killing fields in Ukraine appears to employ the same airlines and aircraft that once flew to Damascus.”

Since the beginning of Russia’s invasion of Ukraine, Iran has run frequent cargo flights to Moscow via Iran Air, Fars Air Qeshm, Puya Air, and Saha Airlines, all linked to the ... IRGC”.²¹⁶

The New York Times reported that “Iran has sent trainers to occupied Ukraine to help Russians overcome problems with the fleet of drones that they purchased from Tehran ... The Iranian trainers are operating from a Russian military base in Crimea where many of the drones have been based since being delivered from Iran. The trainers are from the Islamic Revolutionary Guards Corps” The Times reports that Iranian drones have become an important weapon for Russia, which has used them as “part of the broad strikes across Ukraine against electrical infrastructure and other civilian targets” which have also taken civilian lives. Mick Mulroy, a former senior Pentagon official and retired C.I.A. officer is quoted as confirming that “Sending drones and trainers to Ukraine has enmeshed Iran deeply into the war on the Russian side and involved Tehran directly in operations that have killed and injured civilians.”²¹⁷

In 2023, Ukrainian lawmakers presented a bill calling on Kyiv to designate the IRGC as a terrorist organization,²¹⁸ and the EU recently listed more Iranian individuals and entities for “their role in the transfer of unmanned aerial vehicles (UAVs) to Russia in support of its war of aggression against Ukraine; the transfer of UAVs or missiles to armed groups and entities undermining peace and security in the Middle East and the Red Sea region; or for being involved in Iran’s UAV programme”.²¹⁹ These listing include the IRGC Navy and Mohammad-Reza Gharaei Ashtiani, a commander of the IRGC’s Quds Force.

14. IRGC Terrorism and the Hamas Terrorist Attack on October 7, 2023

a. “Operation Al-Aqsa Flood” – October 7, 2023

In January 2024, a lawsuit was filed against Iran in the U.S. by 67 plaintiffs who were victims of the October 7, 2023, atrocities committed by Hamas in southern Israel, named by Hamas as “Operation Al-Aqsa Flood”. The stunning brutality and cruelty of the Hamas incursion is described in the statement of claim as a “premeditated and coordinated massacre in which terrorists murdered 1,200 people and injured nearly 5,000 more in the deadliest killing of Jews since the Holocaust Innocent civilians were executed, beheaded, and burned alive. Women were maimed and gang-raped. Children were forced to witness the assassinations of their parents, and then were tortured, burned alive, or dispatched with a bullet through their heads. Hundreds of those who survived the murderous assault were kidnapped, taken to Gaza, and held hostage, where many were tortured, raped, and killed.”²²⁰

b. Iranian/IRGC Complicity is Undeniable

- **Several Iranian statements, including from the IRGC²²¹** in the immediate aftermath of the attack had indicated that Iran had claimed a certain level of responsibility for the attacks, although Iran soon backtracked claiming that Iran had not been directly involved. Yet, shortly thereafter as reported by MEMRI: “In contradiction to Iranian Supreme Leader Ali Khamenei’s official denial ... that Iran was in any way involved in the October 7 attack in Israel by Hamas, its proxy in the Palestinian resistance, an Iranian organization whose director is closely affiliated with Khamenei has acknowledged that [senior IRGC commander] Gen. Mohammad Reza Zahedi, who was killed in the April 1, 2024, airstrike in Damascus along with six other top Iranian IRGC Quds Force officials, had ‘a strategic role’ in the planning and execution of Al-Aqsa Flood” Ali Barakeh, a senior Hamas official based in Beirut, also seemed to acknowledge Iranian involvement stating that “the implementation was all Hamas, but we do not deny Iran’s help and support.”²²²
- **Other statements²²³ by regime or outlets admitting or indicating Iranian complicity in the October 7 atrocities have been made including:** “In a May 12, 2024 interview with Iran's Tasnim News Agency, IRGC Quds Force deputy operations chief General Mohsen Chizari said that Quds Force Deputy Commander in Syria and Lebanon Hajj Rahimi, one of the officers killed in the April 1 airstrike in Damascus, had been responsible for training resistance axis members, and that his command and efforts had "resulted" in the Al-Aqsa Flood. General Chizari elaborated: "The honorable [Iranian Supreme Leader Ali Khamenei] is the commander of the resistance axis, and he alone directs, leads and commands it. At one point, the command in the area was in the hands of Hajj Qassem [Soleimani], who worked under Khamenei. Under this command, other commanders [including Hajj Rahimi] successfully advanced the resistance front to a certain place, the result of which was Operation Al-Aqsa Flood [on October 7, 2023].”²²⁴

- **Terrorism Expert Phillip Smith** writing for the Combatting Terrorism Center (CTC) at West Point has also left the door ajar for further analysis explaining that – “As yet, no ‘smoking gun’ has emerged of direct Iranian involvement in or greenlighting of the October 7 attacks. This may reflect the opacity of many proxy-related activities by Iran and Tehran’s deliberate pursuit of plausible deniability. Alternatively, it may reflect the fact that while Iran cocked the gun, it was its Palestinian proxies that pulled the trigger.”²²⁵
- **Hamas Expert Matthew Levitt** summarizes some of the key reports regarding the regime’s direct involvement as a subject for future analysis as information continues to emerge. but ultimately concludes that regardless of these reports, that Iran’s complicity in these events is evident:

Citing a Hamas source, the Wall Street Journal reported²²⁶ that Iran helped plot the attack and that the Islamic Revolutionary Guard Corp gave it the go-ahead at a meeting in Beirut. Another Journal report claims²²⁷ that in the weeks leading up to the assault, hundreds of Hamas and other Islamist militants received specialized training in Iran. Iran, for its part, denied²²⁸ playing any role in the attack, and US intelligence suggests that Hamas attack surprised²²⁹ Iran, undermining the theory it played a direct role planning or training operatives for the plot.

As early as August, Hamas deputy leader Salah Al-Arouri publicly acknowledged, “We are preparing for an all-out war, and we are discussing the prospects of this war with all relevant parties.” Such discussions surely included the IRGC and Hizbullah, with whom Hamas leaders met regularly in a “joint war room”²³⁰ in Beirut. Ultimately, the details of Iran’s role in the plot itself will emerge. But this much is already clear: Iran has funded, armed, trained, and provided intelligence to Hamas for decades. Though Hamas has multiple income streams,²³¹ funding from Iran has been especially important for the group’s military and terrorist structures. As US National Security Advisor Jake Sullivan concluded²³² when asked about Iran’s role in the Hamas attack ...: “[W]e have said since the beginning that Iran is complicit in this attack in a broad sense because they have provided the lion’s share of the funding for the military wing of Hamas, they have provided training, they have provided capabilities, They have provided training, they have provided capabilities...” Tehran played a critical role in creating the monster that is Hamas, which is why Iran shares the blame and responsibility for the brutal attack.”²³³

- **Jonathan Panikoff (Atlantic Council)** also draws the same conclusions regarding Iran’s complicity in the October 7 attacks: “Whether or not Iran helped plan Hamas’s terrorist attack that killed at least 1,300 Israelis is needlessly distracting analysts and the media from the far more important conclusion that we already know: Iran is culpable for the attack For years, Iran has provided Hamas the overwhelming majority of its funding, weapons, and training – all of which were leveraged for this attack. In doing so, Iran ensures that it holds an equal share of responsibility for the success of the attack and for all deaths, injuries, and kidnappings of Israelis and foreign nationals. Whether it helped in the planning, gave a direct order for the attack to happen, or didn’t know it was going to happen is largely irrelevant.”²³⁴

c. Iranian/IRGC Support is the “Common Thread”

According to a 2020 U.S. State Department report, Iran provides about \$100 million annually to Palestinian militant groups, including Hamas. Already by August 2017, newly elected Hamas leader in Gaza, Yahye Sinwar, the Hamas mastermind of the Oct. 7 incursion, had stated that Iran was once more the largest backer financially and militarily” of the Hamas military wing.²³⁵

The centrality of the IRGC in the funding of Hamas and its complicity in the October 7 atrocities is reflected in the U.S. sanctioning of members of the IRGC in the aftermath of the attack, as part of an effort to dismantle “Hamas’s funding networks” following the militant group’s “barbaric” attack on Israel earlier this month.²³⁶ U.S.

officials declared that: “We will not hesitate to take action to further degrade Hamas’s ability to commit horrific terrorist attacks by relentlessly targeting its financial activities and streams of funding The IRGC’s extensive in the development, sponsorship and training of Hamas and other Palestinian terror groups in fact goes back decades involvement and has been expansively documented.

Therefore, Phillip Smith has correctly concluded that: “Most of the fighters who crossed into Israel were members of Hamas and Palestinian Islamic Jihad (PIJ), but they were joined by gunmen from numerous smaller Palestinian factions. ... One common thread linking the attackers were their extensive financial, military, and political connections to the Islamic Republic of Iran. ...[T]hese associations were the product of extensive cultivation and management of a Palestinian “Axis of Resistance” by Tehran over many years.”²³⁷

15. The IRGC’s Violation of Human Rights as a Tool of Terrorism

To contend effectively from a policy perspective with what are broadly categorized as “human rights violators”, it is important to understand the different modalities within that genre of illicit behaviours. Different violators commit these egregious crimes for different reasons, in different contexts, and often with different degrees of political and legal implication. Deterring these behaviours therefore requires different types of policy tools to achieve what are often a variety of potential objectives which may vary from case to case.

As this paper will demonstrate, the autocratic complexion of the Islamic Republic differs in many ways from most if not all other malign autocratic regimes in a variety of ways, and the vast and uncontestedly brutal nature of the regime’s human rights violations reflect its unique complexion. The IRGC’s violations differ in motivation and therefore at times in execution and character, from those of other autocratic state violators of human rights. The IRGC is not analogous to most other state entities including those of authoritarian regimes. It has a uniquely honed identity, whose primary loyalty as transnational Islamic “warriors without borders”²³⁸ is not to any nation-state including Iran but to the Supreme Leader and the Islamic Revolution. Their training is tailored to produce the requisite ruthlessness for exporting the Revolution across the globe and for mercilessly destroying the Revolution’s “enemies” both within Iran and abroad. In short, the IRGC’s ideological embrace of extreme violence and terrorism stems directly from several core ideological axioms promoting a terrorist ethos that is the active ingredient of the IRGC’s very identity, and also accounts for the excesses and scope of the violence of its human rights abuses. Every violation is in fact a furtherance of a foundational terrorist and ideological objective.

Therefore, unlike other regimes which may have any number of reasons for silencing the dissent of their citizens. The IRGC’s legendary vehemence and industrial scale cruelty in crushing even its fellow Muslim countrymen, stems from enhanced ideological training to craft a warrior who see those dissenters not so much as an opposition or threat to be silenced, but a theological evil that mandates their destruction and violation. They are deemed to be enemies of God and Islam and the horrors that must be inflicted upon them are religiously mandated as an ethic by the Highest of Authorities, both in heaven and on earth. The IRGC’s violation of human rights as such is considered by the regime to be a good unto itself, and justified and mandated as part and parcel of what is required to fulfill the IRGC’s prime mandate – violently exporting the Revolution and eradicating all opposition by any means required. In short its serves the purposes of IRGC’s terrorist identity, as one more tool in fulfilling its terrorist objectives.

The IRGC’s centrality as the leading purveyor of global terrorism should therefore not obscure the IRGC’s pristine record of war crimes, crimes against humanity and a vast litany of other crimes and violations of international humanitarian law²³⁹ that have been integral to the furtherance of its terrorist agenda – and which should be considered

in any deliberation on an IRGC terrorist designation. Notably, the IRGC was directly complicit in the slaughter of as many as half a million²⁴⁰ Syrians by the Assad regime;²⁴¹ has instigated multiple lethal conflicts and instability regionally and across the globe; has inflicted egregious harm on various Iranian minorities; is a world leader in the execution of minors; has overseen the lethal repression of the Iranian people; and is responsible for the imprisonment, torture and murder of Canadian citizens.²⁴² Of particular note is the IRGC's vast systemic and systematic use of sexual violence against prisoners, dissidents and other perceived enemies of the regime, since the founding of the regime in 1979.²⁴³ Most recently as noted by multiple human rights organizations, Iranian women imprisoned during these last years of protests have been subjected to rape and sexual assault by the IRGC and other Iranian authorities "on an industrial scale".²⁴⁴ As noted in a an April 2024 report by the American Jewish Committee (AJC):

Less than a week after another UN report validated the horrific crimes committed against women by Hamas during the October 7 terror attacks on Israel, [another] UN report²⁴⁵ revealed a strikingly similar pattern of sexual violence carried out by Iran's security forces in order to silence and punish protesters and their supporters.

The Mission found that State agents belonging to the Basij, police, IRGC, the Ministry of Interior, and the Ministry of Intelligence committed sexual and gender-based violence at a large scale, documenting cases of rape and other forms of sexual and gender-based violence committed against men, women and children, protesters as young as 12 years old in 14 different provinces in Iran.²⁴⁶

Section #2 – The IRGC as a Domestic Threat to Canada and Canadians

1. IRGC’s Legacy of Attacks Against Canadians

Over the last 45 years, the IRGC has been responsible for and directly involved in, multiple egregious crimes against Canadians including: the kidnapping, torture and murder of Canadian dual citizens visiting Iran;²⁴⁷ the murder or injury of Canadians by IRGC terrorist proxies like Hamas;²⁴⁸ ongoing threats of violence against Iranian expats and dissidents living in Canada;²⁴⁹ and the shootdown of Ukrainian Airlines flight PS752, which Canadian courts have found to be a deliberate act of IRGC terrorism.²⁵⁰ In 2018, the regime also had utilized the services of Assadollah Assadi,²⁵¹ an Iranian diplomat in Vienna and former member of the Basij, a large violent militia within the IRGC command structure,²⁵² (for more on the Basij see Section #1-12), to attempt the bombing of an anti-regime rally in Paris²⁵³ attended by VIPs from across the globe including former Canadian Prime Minister Stephen Harper and other current and previous members of Canada’s Parliament.²⁵⁴ Additionally, the IRGC’s military support of the Taliban since 2001 renders it directly complicit in any injury or death suffered by Canadian soldiers or their allies who fought in Afghanistan during that period.²⁵⁵

2. Canada as a Preferred Destination for the IRGC and its Proxies

a. “Canada was their favourite spot because it was very easy to get into”

As noted by the Canadian Security Intelligence Service (CSIS),²⁵⁶ Iran experts, regime members and investigative journalists, IRGC personnel and their families have made Canada a preferred destination for business, education and leisure over the last four decades.²⁵⁷ The matter has been the subject of ongoing media reporting, and testimony before parliament.²⁵⁸ As noted by a former IRGC member to Macleans magazine: “Canada was their favourite spot because it was very easy to get into They would send students over there, businessmen. They would set up a business but would actually be part of the network. Canada is also attractive to Iranian intelligence agencies because of its proximity to the U.S.”²⁵⁹

b. IRGC Proxies and the Crime -Terror Nexus in Canada

Iran’s IRGC proxies are an integral part of the crime-terror nexus in Canada. A recent report²⁶⁰ by the International Coalition Against Illicit Economies (ICAIE) outlines the convergence in Canada of criminal, terrorist and state involvement in multiple areas of illicit trade including money laundering, counterfeiting and narcoterrorism which has been “a key driver in undermining the financial and economic integrity of Canada”. The report describes the enormity of damage this nexus is inflicting on Canada and Canadians “as one of the pre-eminent criminal threats to Canada and its global partners. Transnational organized crime groups and professional money launderers are key threat actors helping to expand illicit markets and corruptive influence across Canada. The networks involved in laundering of dirty money associated with illicit trade undoubtedly tap the same criminal pipelines used by foreign adversaries and other national security threats, including terrorists and other criminals”.

- **The Illicit Canadian Funding of IRGC Proxies**

The ICAIE describes²⁶¹ Canada as “a safe haven for the world most notorious criminal groups and threat finance networks including Iranian backed militias such as Hezbollah and Hamas.” In its overview of Iran’s malign activities in Canada the report cites the Cullen Commission hearings which found that:

“[N]umerous connections between government casinos in British Columbia, casinos in Macau and Las Vegas, and international drug traffickers and loan sharks moving money between Vancouver, Latin America, and Asia via Chinese underground banks, alternative remittance systems, and the purchase of real estate. More serious harms related to the scale of the laundering of dirty money imputes numerous industries and professional enablers in Canada that help move money for the Mexican cartels, Asian syndicates, Chinese corrupt officials, and terrorist groups including Hamas, Hezbollah, and al-Qaeda.²⁶²

Other cases have highlighted how Canadian nationals and underground currency exchanges have helped Iran evade sanctions and assisted in the laundering of funds for money service facilitators for²⁶³ terrorist financing operations of both Hezbollah and Hamas. Police investigations and wiretaps evidence have also revealed in Canadian court cases high profile Iranian criminal networks controlling the Vancouver port, and other Canadian ports, and partnering with Hells Angels and Mexican cartels. In Toronto, RCMP’s Project Harrington further revealed Iranian crime networks including, Vancouver port, and other Canadian ports, and partnering with Hells Angels and Mexican cartels. In Toronto, RCMP’s²⁶⁴ Project Harrington further revealed Iranian crime networks including, Jahanbakhsh Meshkati, involved with the massive cartel operations. Meshkati was also known for his ‘encrypted blackberry businesses’ and had access to the Halifax Port where military personnel were compromised relative to a massive cocaine importation ring.²⁶⁵

Another ICAIE report²⁶⁶ cites “... A contemporary example of these concerns regarding Canada is the recent investigations into the former head of RCMP’s Intelligence Program, Cameron Ortis, and the role of Pakistani national Altaf Khanani in Canada”:

It is alleged that Khanani used money mules and currency exchanges across six continents to launder dirty money for drug cartels in Toronto, Montreal, Vancouver, and other cities. Such exporting of terrorist-laundered funds has led to further destabilizing of peace in the Middle East, and helped to arm and finance Hezbollah, Hamas, Al-Qaeda, and other terrorist groups for their barbaric attacks on Israel, as witnessed on October 7, 2023. The criminality of the money financiers for Hezbollah and other Iranian-backed “Axis of Resistance” militias in Canada ... On November 22, 2023, Ortis was found guilty of providing sensitive operational intelligence and secrets to criminals in violation of the Security of Information Act. ... Ortis is also accused of profiting from criminals by providing highly encrypted communication technologies to drug cartel bosses. The combination of Iranian crime networks which Canada is well known to house, amplified by dismissing their importance for decades, is a deadly blend. As per the testimony of RCMP (Dan Morris), Canadian global encryption companies were identified as illicit trade facilitators, and were highlighted even by defense counsel as potentially contributing to global insecurity and supporting national security threats such as Hezbollah, Hamas, and other Iranian-financed militias

c. The IRGC's Hezbollah Proxy Has Been a Malign and Criminal Presence in Canada for Decades

The IRGC²⁶⁷ and its proxies, particularly Hezbollah, have been a malign and criminal presence in Canada for decades,²⁶⁸ involved in organized crime and intelligence gathering,²⁶⁹ exploring potential targets,²⁷⁰ purchasing dual-use equipment,²⁷¹ dealing in contraband and money laundering,²⁷² procuring nuclear technology, developing Canadian assets,²⁷³ and pursuing other malign opportunities on Canadian soil.²⁷⁴

- A 2016 report by Public Safety Canada stated that Hezbollah “has networks around the world, including in Canada, and uses the networks for recruitment, fundraising and procurement.”²⁷⁵ But as terrorism expert Matthew Levitt points out: “Hezbollah has been active in Canada since the 1980s raising money through criminal activities and charity, procuring dual-use items, and sometimes engaging in potentially preoperational surveillance of principally Jewish and Israeli targets ... produces false travel documents in Canada and in a few instances fugitive Hezbollah operatives ... have been found hiding in Canada”,²⁷⁶ and Canadian recruits have over the years been involved in terrorist acts in various countries.²⁷⁷
- Canadian investigative journalist Stewart Bell writes: “The extent of Hezbollah operations ... first came to light in the 1990s when ... Mohammed Hussein al-Husseini was arrested for deportation. He told CSIS about a vast cross-Canada network. ... In two cases, alleged Hezbollah agents wanted for terrorist activities overseas were found hiding out in Edmonton and Ottawa. One of them has been charged with taking part in a 1993 bombing attack in Saudi Arabia that killed 19 Americans. ‘Hezbollah has members in Montreal, Ottawa, Toronto – all of Canada,’ Mr. Al-Husseini, a member of Hezbollah's security organization, told CSIS before he was deported in 1994”.²⁷⁸
- In a report released November 17, 2011, the University of Toronto’s Citizen Lab found that Canada-based servers host websites for more than a dozen ministries of the Syrian government. They also host the website for the Hezbollah media arm Al-Manar. “The website for Al-Manar – the official media arm of the Lebanese political party, Hezbollah – is hosted on Canada and U.S.-based web servers and employs Canada-based web servers to stream its TV broadcast globally. Al-Manar satellite broadcasts have been banned by the US, France, Spain, and Germany as well as the European Union. The United States includes Al-Manar on its specially designated nationals list, a list of entities with which U.S. persons are generally prohibited from dealing, and the assets of which are blocked. Canada currently classifies Hezbollah as a terrorist organization.”²⁷⁹
- In 2014, Hezbollah's activities in Canada here were among the subjects CSIS expressed concern about in a “top secret” 10-page letter CSIS director Michel Couombe’s wrote to Public Safety Minister Steven Blaney describing ongoing threats. “Hezbollah is widely considered to be one of the most operationally capable terrorist organizations in the world,” Couombe wrote in his letter, obtained under the *Access to Information Act*.²⁸⁰
- In 2014 CSIS revealed Hezbollah’s interest in Canada included access to Canadian passports: “The terrorist group Hezbollah has been seeking operatives with Canadian passports, a senior intelligence official told MPs reviewing a bill ... that could strip terrorists of their citizenship. Appearing before the Standing Committee on Citizenship and Immigration, the Canadian Security Intelligence Service official said Canadian passport holders were being actively sought by terrorist groups. ‘We see certain terrorist

organizations in particular target the use of the Canadian passport because of its value ...’ said Michael Peirce, the CSIS Assistant Director of Intelligence. ‘And they will seek out dual nationals for the purpose of using that passport to facilitate travel. And we’ve seen that, at least some indications, in regard to Hezbollah, for instance. So that document is an extremely valuable document and gaining citizenship in order to be able to use that document is a noted goal’.”²⁸¹

- Stewart Bell describes the Hezbollah framework in Canada as set up under the direction of Imad Mughniyah,²⁸² one of its most notorious leaders later killed in Lebanon, but considered to be among the world's most dangerous terrorists. Mughniyah’s interest in Canada cannot be dismissed as simply a local Hezbollah initiative originating in Lebanon. Mughniyah worked within the highest levels of IRGC and was a link between Iran and Hezbollah, taking orders from Iran's Supreme leader, Ayatollah Khomeini, and reporting to the head of the Qods Force.²⁸³

d. Hezbollah’s Unit 910 in Canada

“Unit 910, also known as Hezbollah’s external operations unit ... has demonstrated that it has terrorist infrastructures in diverse arenas around the world and it has committed, or intended to carry out, terror attacks against Israeli, American, and Jewish targets on many continents and regions. In recent years, the arrests of three Unit 910 operatives in the U.S. demonstrated Hezbollah’s efforts to gather intelligence on strategic targets for possible terrorist attacks in the homelands of U.S. and Canada.”²⁸⁴ Once such operative Ali Kourani, was arrested by US authorities in 2017 after gathering intelligence for possible terrorist attacks on JFK International Airport and Pearson International Airport in Toronto, amongst other targets.²⁸⁵ It should be noted that 910 also manages Hezbollah’s transnational criminal networks.²⁸⁶

e. Prof. Payam Akhavan

Payam Akhavan, Professor of International Law at McGill University, former UN war crimes prosecutor, and founder of the Iran Human Rights Documentation Centre has noted that “There are numerous accounts in the Iranian community of the Islamic Republic elite and their families making Canada their home and investing hundreds of millions of dollars in real estate projects in Toronto and elsewhere, spreading their illicit wealth, pernicious influence and menacing networks in our country. This ... is clearly a security threat. And it is a grave insult to the many Canadians of Iranian origin who are victims of this same elite, not to mention the millions of Iranians fighting for democracy.”²⁸⁷

f. Prime Minister Justin Trudeau

Prime Minister Trudeau recently admitted that: “We know there are people in Canada now who have benefited from the corrupt, from the horrific regime in Iran and who are hiding amongst ... this beautiful community.” “The Canadian premier also noted that his government will be working to ensure his country is never again a safe haven for ‘killers, murderers, and those responsible for the oppression of Iranian people’.”²⁸⁸

g. The Association of Families of Flight PS752 Victims

“The spokesman of the association of PS752 victims’ families, Hamed Esmaeilion, whose daughter and wife perished in the IRGC shutdown of PS752, had called for the expulsion of all the agents and officials affiliated

with the Islamic Republic as well as their family members who have immigrated to Canada. ... Esmaeilion said the regime's politicians, military and security personnel and their families have turned Canada into a 'safe haven' for themselves and should be 'deported without delay'.”²⁸⁹

h. Global News Exposé Provides Details on the IRGC Presence in Canada (Nov. 2023)

“As revealed during a lengthy investigation by Global News’ current affairs program *The New Reality*, the threats against [PS752 family member] Esmaeilion are not unusual for critics of the Islamic Republic, especially among the Iranian diaspora in Canada. In fact, *The New Reality* heard from Iranian Canadians, legal experts, and security and intelligence sources who say Canada has an especially big problem with hundreds, maybe thousands, of potentially dangerous regime-connected officials here on Canadian soil. Prominent Iranian American journalist and human rights activist Masih Alinejad tells *The New Reality* she was given a bone-chilling warning from the FBI: don’t travel to Canada. ‘That’s heartbreaking. Canada should be safe,’ Alinejad says”²⁹⁰

i. The West Block (Global News Nov. 2023)

“... Our Negar Mojtahedi, uncovered evidence of more than 700 regime operatives here on Canadian soil. From money laundering to threats to murder plots, the impunity with which the regime appears to be operating in Canada is shocking.”²⁹¹

j. The StopIRGC initiative

“A grassroots group of lawyers and concerned Iranians in Canada is working to disrupt Iranian government influence operations in the country with the community’s help More than 50 percent of those we are investigating are already Canadian citizens, which makes pursuing the matter more challenging”²⁹²

3. Iran and the IRGC are a Leading Cyber Threat to Canada and its Allies

- a. In November 2020, for the first time, the Canadian Centre for Cyber Security²⁹³ as part of Canada’s Communications Security Establishment’s (CSE), the national cryptologic agency providing the Government of Canada with information technology security and foreign signals intelligence,²⁹⁴ formally named Iran as being amongst the most significant cyber-threats to Canada, alongside state-sponsored hackers from China, Russia and North Korea.²⁹⁵ In 2022, CSIS reported that “Canadian organizations are the victims of ‘thousands’ of cyberattacks every single day, and that number is only going up”,²⁹⁶ with numerous federal government reports on listing “state-sponsored cyber attackers as the greatest strategic threat to Canada right now, with the four biggest hostile states [once again] including Iran.”²⁹⁷
- b. As noted by the U.S. Cybersecurity and Infrastructure Security Agency (CISA): “Iranian cyber threat actors have been continuously improving their offensive cyber capabilities”,²⁹⁸ exercising “increasingly sophisticated cyber capabilities to suppress certain social and political activity, and to harm regional and international adversaries”²⁹⁹ Microsoft has similarly noted the “gradual evolution of the tools, techniques, and procedures employed by malicious network operators based in Iran throughout 2021”.³⁰⁰ According to the U.S. Office of the Director of National Intelligence 2021 Annual Threat Assessment, “Iran’s expertise ... make it a significant threat to the

security of US and allied networks and data” and “Iran has the ability to conduct attacks on critical infrastructure, as well as to conduct influence and espionage activities.”³⁰¹ And despite Israel’s well-earned status as a world leader in cyber warfare and defence, Iran’s cyber malevolence against the Jewish state has been “responsible for some of the most costly, sophisticated, and well-organized computer attacks endured by the Israeli government and corporate sector.”³⁰²

The IRGC has been identified by the “U.S. intelligence community and various private sector threat intelligence organizations ... as a driving force behind Iranian state-sponsored cyberattacks, either through IRGC contractors in the Iranian private sector or by the IRGC itself.”³⁰³ The IRGC was specifically mentioned in this context in a joint advisory issued in September 2022 by the U.S., UK, Canada, and Australia, warning that groups associated with the IRGC have been engaging in large scale data encryption and extortion operations that include Canada.³⁰⁴ Unsurprisingly the IRGC has worked closely with banned terrorist entities like Hamas and Hezbollah to develop their capacities in cyber-related terrorism.³⁰⁵

4. The IRGC and Foreign Interference in Canada

a. What is Foreign Interference?

There are no universally accepted definitions³⁰⁶ of the terms “transnational repression” and “foreign interference” which often appear together or are used interchangeably in public discourse. The terms generally refer to categories of malevolent often covert foreign intervention by state or non-state actors against state, community or individual targets in other countries. The “the term ‘transnational repression’ is often used to refer to incidents against individuals, such as direct harassment [or other types of threats], while ‘foreign interference’ is commonly employed to discuss institutional incidents, such as cyber-attacks against a government agency or processes, such as democratic elections.”³⁰⁷

There have been a variety of definitions utilized for these terms proposed by academics, lawmakers, and security agencies. Public Safety Canada describes foreign interference as “activities undertaken by state or non-state actors that are harmful to Canada's interests and are clandestine or deceptive or involve a threat to any person” that “can target Canada's democratic institutions, communities, economy, sovereignty, and critical infrastructure (including supply chains). Activities can include harassment and intimidation of Canadian communities, as well as cyber-incidents, disinformation campaigns, and other disruptive actions.”³⁰⁸

CSIS defines “foreign interference or foreign-influenced activities” to broadly include “attempts to covertly influence, intimidate, interfere, corrupt or discredit individuals, organizations and governments to further the interests of a foreign country”.³⁰⁹ Global Affairs Canada (GAC) describes foreign interference as “the attempt to covertly influence, intimidate, manipulate, interfere, corrupt or discredit individuals, organizations, and governments. It is an attempt to further the interests of a foreign country over the views of its citizens. Activities can be carried out by both state and non-state actors, and it differs from normal diplomatic conduct due to its deceptive and clandestine nature”.³¹⁰ Or as put succinctly by former Australian Prime Minister Malcolm Turnbull, “behavior that is ‘covert, coercive, or corrupting’” is “the line that separates legitimate influence from unacceptable interference”.³¹¹

The target of transnational repression is a systematic effort, “generally by an authoritarian or non-democratic state, to prevent political dissent by targeting members of its emigrant or diaspora communities”.³¹² These governments reach across borders including those of Canada and other Western countries to “silence, coerce, harass, or harm members of diaspora and exile communities”.³¹³ Transnational repression is often used to target individuals who oppose or who are critical of a government, including journalists, human rights defenders, religious or ethnic minority groups and political opponents³¹⁴ through assassinations, illegal deportations, abductions, digital threats, Interpol abuse,³¹⁵ and “coerced repatriation and detaining family members in the home country”.³¹⁶ But these violations are not restricted only to high profile dissidents. They can also be inflicted on ordinary individuals for any small or mundane act perceived as a challenge to the offending regime.³¹⁷ This conduct constitutes a national security threat,³¹⁸ a criminal violation of national sovereignty,³¹⁹ and serves as a “potent tool of global authoritarianism” posing “a threat to freedom and democracy worldwide.”³²⁰ A CSIS spokesperson quoted in the Washington Post concurred stating that “ultimately, these hostile activities and foreign interference undermine the security of Canada and Canadians, as well as our democratic values and sovereignty”.³²¹

b. Iran, the IRGC and Foreign Interference – A Leading Global Violator

Since the founding of the Islamic Republic in 1979, Iran has distinguished itself as a global leader in transnational repression and foreign interference,³²² which has been described by one scholar as “the primary tool in the regime’s toolkit in silencing dissidents and voices in academia, the policy world, and media in the West”.³²³ As noted recently by U.S. Department of the Treasury: “The MOIS and Iran’s Islamic Revolutionary Guard Corps (IRGC) have long targeted perceived regime opponents in acts of transnational repression outside of Iran, a practice that the regime has accelerated in recent years. A wide range of dissidents, journalists, activists, and former Iranian officials have been targeted for assassination, kidnapping, and hacking operations across numerous countries in the Middle East, Europe, and North America.”³²⁴

Iran was listed by Freedom House as one of six countries known to be conducting aggressive campaigns against political opponents overseas. Freedom House notes that Iran has an “expansive definition” of “who poses a threat to the internal order ... and even ordinary citizens who simply chose to leave Iran of their own volition, are deemed as threats to ‘security’, and even ‘terrorists’.”³²⁵ According to Freedom House, “The Iranian campaign is distinguished by the total commitment it receives from the state, the level of violence that it employs, and its sophisticated application of diverse methods against a similarly diverse set of targets.”³²⁶

Notably, the British government “filed an Interpol notice stating that IRGC operatives were involved in planning “lethal operations against Iranian dissidents in the UK in 2020”.”³²⁷ Then in 2022 Ken McCallum, director-general of MI5 concurred that Iran’s transnational repression compared to other state violators “most frequently crosses into terrorism,” saying authorities have uncovered at least ten “potential threats” this year [2022] to “kidnap or even kill British or U.K.-based individuals perceived as enemies of the regime”.³²⁸ And in 2023 the Guardian reported that MI5 had foiled “15 plots by Iran against British or UK-based ‘enemies’”³²⁹ including an IRGC plot to assassinate two Iran International television anchors in London.³³⁰ More recently, a January 29, 2024, article in The Times reported that “Iranian dissidents living in the UK have been warned by counterterror police in the past fortnight of an increased risk of violence and kidnap Potential targets have been told that Tehran is using criminal proxies such as gangs to carry out assassination attempts, death threats and other intimidation tactics.”³³¹

This report from London was accompanied by a sanctions announcement from the U.S. Department of the Treasury stating that:

The U.S. Department of the Treasury’s Office of Foreign Assets Control (OFAC) and the United Kingdom are taking joint action against a network of individuals that targeted Iranian dissidents and opposition activists for assassination at the direction of the Iranian regime. The network is led by Iranian narcotics trafficker Naji Ibrahim Sharifi-Zindashti (Zindashti) and operates at the behest of Iran’s Ministry of Intelligence and Security (MOIS). Zindashti’s network has carried out numerous acts of transnational repression including assassinations and kidnappings across multiple jurisdictions in an attempt to silence the Iranian regime’s perceived critics. The network has also plotted operations in the United States The United States, alongside our international allies and partners, including the United Kingdom, will continue to combat the Iranian regime’s transnational repression and will utilize all available tools to stop this threat, especially on U.S. soil Zindashti and his network are intertwined with Iran’s transnational repression efforts to silence and intimidate dissidents, former insiders, and other perceived opponents by carrying out assassinations and kidnappings under the direction of the MOIS across multiple continents³³²

c. Iran, the IRGC, and Foreign Interference in Canada

“Foreign interference in our democratic institutions, if not adequately addressed, will become a grave, persistent, and – in the words of David Vigneault, director of the Canadian Security Intelligence Service (CSIS) – ‘existential’ threat to Canadian democracy.”³³³

Various expat diaspora communities have reported malevolent and widespread foreign interference efforts by various foreign powers. As noted in a Public Safety Canada memo: “In recent years, Canada has seen an increase in the frequency and sophistication of foreign interference by state actors, including the People's Republic of China (PRC), the Russian Federation, the Islamic Republic of Iran.”³³⁴ Canada has come under scrutiny both domestically and abroad for its poor management of foreign interference initiatives within its borders.³³⁵ Experts³³⁶ have provided various explanations for Canada’s vulnerability to foreign interference and to other forms of malign criminal and terrorist activities, but there is no dispute that foreign interference has had significant and consequential impact on multiple diaspora communities living in Canada and has inflicted harm on Canada’s economic political and civic institutions.³³⁷ In May 2024, Public Inquiry into Foreign Interference commissioner Marie-Josée Hogue in her first report pointed to five countries – China, Russia, India, Pakistan and Iran – “who are key threat actors against Canada and details some of their methods used to influence foreign countries”.³³⁸

In a February 2024 letter addressed to Commissioner Marie-Josée Hogue, Liberal MP Ali Ehsassi, Chair of the House of Commons Foreign Affairs Committee, called for testimony and documentation from Iranian-Canadians and others with regard to Iran’s malign foreign influence operations in Canada: “Given the catalogue of malign and illegal activities committed by the Islamic Republic of Iran on Canadian soil, it would be naïve to believe that the Iranian regime has any compunction to shape public opinion in Canada.”³³⁹

Dick Fadden, former head of the Canadian Security Intelligence Service (CSIS), in an interview with *The West Block* also warned about the commission ignoring Iran,³⁴⁰ echoing CSIS’ 2024 report that Iran has continued to conduct hostile activities in Canada and will “continue to target its perceived enemies even when living in foreign countries in support of its ultimate goal of regime preservation.” CSIS called Iran’s external operations in Western countries “aggressive and expansive”, including lethal plots in the U.S., the UK, and several European countries. Those

activities included elicitation, cultivation, coercion, illicit financing, malicious cyber activities, and information manipulation. “Iran and its intelligence services are interested in influencing and clandestinely collecting information on the Iranian community, including anti-regime activists and political dissidents; human, women’s and minority rights activists; and fugitives wanted by the regime,” the report read.³⁴¹

Iranian expats living in Canada have in fact complained for decades about being subject to threats and interference at the hands of the Iranian regime.³⁴² This is by no means a new revelation to Canadian authorities. Canada’s large Iranian diaspora community have been openly on Tehran’s radar screen for years. In a 2012 interview for the Iran-based website for Iranian expatriates in Canada, the cultural affairs attaché at the Iranian Embassy in Ottawa, Hamid

Mohammadi urged Iranian-Canadians to “occupy high-level key positions” and “resist being melted into the dominant Canadian culture”.³⁴³ He welcomed the increasing numbers of Iranians living in Canada, estimating them at about half a million and deeming this number advantageous for Iran, noting that part of this community, the second generation ... was already integrating into the influential government apparatus Mohammadi went on to describe Iran’s intention of recruiting Iranian-Canadians to serve Iran under the cover of cultural activity: “By 2031, the total immigrant population of Canada will increase by 64%, and the number of Iranians will increase due to birthrate. So therefore, we need to put into effect very concentrated cultural programs in order to enhance and nurture the culture in this fast-growing population. It is obvious that this large Iranian population can only be of service to our beloved Iran through these programs and gatherings.” The Tabnak website, identified with Iran’s Expediency Council secretary Mohsen Rezai, criticized Mohammadi's statements, claiming that they provided a sufficient pretext for Canadian authorities to subject Iranian-Canadians to pressure and scrutiny.³⁴⁴ In response, Canada’s Ministry of Foreign Affairs warned of the malign efforts of the Iranian diplomatic personnel in Canada stating that “Iranian-Canadians have rejected the oppressive Iranian regime and have chosen to come to Canada to build better lives The Iranian embassy should not interfere in their choices. Canadian security organizations will act to prevent threats and intimidation of Canadians.”³⁴⁵

5. The Gravity of the Current IRGC Threat to Canada and the West

a. Tehran Has Reinvigorated its Policies in Assassinating Regime Dissidents and Other Foreign Citizens Abroad

In 2016, Brigadier General Hossein Salami, Deputy Commander of the IRGC, warned the international community of the regime’s intentions: “[E]nemies of Islamic Republic of Iran: Do not make this mistake again as the revolutionary forces will chase them and kill them anywhere in the world. For chasing our enemies, we do not have any limit or red line and our armed forces have proved this in the last few years.”³⁴⁶ Salami was correct. Over the past 45 years, hundreds of dissidents³⁴⁷ have been murdered by the IRGC and Hezbollah in at least 40 countries³⁴⁸ including those in the West. These assassinations have often been aided by diplomatic personnel,³⁴⁹ who are often affiliated with the IRGC or MOIS.³⁵⁰ Iran’s campaign has constantly targeted dissidents, Western opponents, Israelis, and Jews in assassination plots and abduction plots over the years “including at times and in places where carrying out such operations could undermine key Iranian diplomatic efforts, such as negotiations over the country’s nuclear program”.³⁵¹

A recent regime and IRGC³⁵² tactic of concern are renditions, in which the IRGC “leads operations to kidnap exiles from other countries and forcibly repatriate them”.³⁵³ Furthermore as widely reported,³⁵⁴ Tehran has reinvigorated its aggressive policies in assassinating regime dissidents and other foreign citizens abroad as well as western public officials. As noted by counterterrorism expert Matthew Levitt in 2022:

According to a data set maintained by this author of Iranian foreign operations (including assassination, abduction, and surveillance plots), over just the past five years Iran has instigated at least 33 plots in Europe. These include [plots](#) in EU member states like Cyprus, Denmark, France, Germany, and the Netherlands. Other plots elsewhere in Europe occurred in Albania, Sweden, and the U.K. In each of these cases, investigations have been opened, and in many cases judicial authorities are engaged in active prosecutions targeting IRGC and other Iranian operatives. Consider, for example, the assassination plot targeting Bernard-Henri Levy in France; the plot targeting an Iranian dissident rally in Paris in 2018; plots surveilling and targeting Iranian dissidents in Albania, the Netherlands, Germany, Sweden, Scotland, and the U.K.; and attacks on German synagogues in North Rhine-Westphalia. According to a recent report issued by Austria's Federal Office for the Protection of the Constitution and Counterterrorism, Iranian intelligence services – including the IRGC's intelligence organization and its Quds Force – have spread in the country.

Beyond Europe, the latest evidence of Iranian terrorist plotting abroad came out last Friday, when senior U.S. officials gathered for a press conference to reveal the indictment and arrest of three criminals charged with the attempted murder-for-hire of an American-Iranian journalist in New York. The three were part of an organized criminal organization based in Eastern Europe with ties to Iran. The leader of the group, who was based in Iran, was enlisted by Iranian agents in 2022 to assassinate the victim in the United States. Speaking at the press conference, FBI Director Christopher Wray underscored that this was an Iranian terrorist plot: “The conduct charged shows how far Iranian actors are willing to go to silence critics, even attempting to assassinate a U.S. citizen on American soil.”

In August, the U.S. Department of Justice indicted IRGC personnel behind assassination plots targeting former senior U.S. government officials in the United States, among others. In 2019, two Iranian operatives pleaded guilty to charges stemming from their surveillance activities targeting Iranian dissidents and Jewish targets in the United States. More recently, the IRGC agreed to pay an assassin \$300,000 to kill John Bolton and offered \$1 million for the assassination of former Secretary of State Mike Pompeo, according to the FBI affidavit underpinning the Department of Justice criminal complaint against IRGC officer Shahram Poursafi. Poursafi is wanted by the FBI and is accused of the precise crimes the EU considers terrorist acts, including murder-for-hire and attempting to provide support for terrorist acts. In other cases, U.S. officials indicted four Iranian operatives on kidnapping charges after they plotted to kidnap Masih Alinejad, an American citizen of Iranian descent, from New York and forcibly remove her to Iran, via Venezuela, “where the victim's fate would have been uncertain at best,” as the U.S. attorney for the Southern District of New York put it. *According to U.S. authorities, the Iranian official behind this plot directs a broader network of Iranian operatives actively targeting victims in other countries, including Canada, the U.K., and the United Arab Emirates....*³⁵⁵

b. Ongoing Regime Threats to Canadians

- **“In November 2022, CSIS publicly announced** in a media statement to CBC News that it was “actively investigating several threats to life emanating from the Islamic Republic of Iran” toward individuals in Canada. CSIS said that it was aware that state actors from Iran were monitoring and intimidating individuals inside Canada, particularly aiming to silence those who criticize the regime. According to CBC News, this was “the first time the agency has confirmed multiple ongoing investigations into what it calls ‘lethal threats to Canadians and people located in Canada’ emanating from Iran.”³⁵⁶ CBC further reported that “U.S. authorities laid charges

in connection with an alleged Iranian plot to kidnap five people – including three individuals from Canada³⁵⁷ – and take them to Iran”.³⁵⁸

- **More recently in January 2024, the U.S. Department of the Treasury’s Office of Foreign Assets Control (OFAC) and the UK recently announced sanctions “against a network of individuals that targeted Iranian dissidents and opposition activists for assassination at the direction of the Iranian regime. The network is led by Iranian narcotics trafficker Naji Ibrahim Sharifi-Zindashti (Zindashti) and operates at the behest of Iran’s Ministry of Intelligence and Security (MOIS). Zindashti’s network has carried out numerous acts of transnational repression including assassinations and kidnappings across multiple jurisdictions in an attempt to silence the Iranian regime’s perceived criticsran-based narco-trafficker **Zindashti’s network has been linked to murders in several countries, including the United Arab Emirates, Canada, and Türkiye**”³⁵⁹** The U.S. announcement also provided information regarding Iran’s hiring of Canadians to carry out assassinations:

... In 2021, Zindashti’s network recruited Canadian national and British Columbia-based Hells Angels Outlaw Motorcycle Group member Damion Patrick John Ryan (Ryan) to assassinate individuals in the United States who fled Iran. Ryan, whose criminal history ranges from firearms trafficking charges to international drug trafficking, has ties to criminal elements in Canada, the United States, and Greece. Zindashti associate Asan worked closely with Ryan to plan the assassinations, sending the location and photos of the targets, in addition to coordinating payment details. Ryan also recruited Canadian national and Hell’s Angels affiliate Adam Richard Pearson (Pearson) to carry out the murders.³⁶⁰

c. **The Washington Post Outlines the IRGC Threat Notably Referencing Canada (Dec. 2022)**³⁶¹

“They are actively trying to abduct and kill people” – “[Terrorism expert Matthew] Levitt said that Iran has a long history of lethal operations, but also of surveilling targets and formulating plans for killings and abductions that security services put on a shelf for future activation. Now, though, he said, ‘they’re not collecting information so they can try to abduct and kill people if they want to. They are actively trying to abduct and kill people.’”

“The most ambitious and far-reaching [effort] in recent memory” – “Officials say Iran’s persistence makes it likely to eventually carry out the killing of a high-profile dissident, journalist or Western government figure, and that could spark direct confrontation with Tehran The tempo of the plots has dramatically increased in the past two years, and they are among the most ambitious and far-reaching in recent memory, according to the officials and documents. Iran’s actions have led to diplomatic expulsions and warnings to potential targets from governments” **“The intensity of the Iranian campaign is reflected in its global reach, officials said.”**

- **CSIS: “The Iranian government has stepped up its efforts to kidnap and kill government officials, activists and journalists”**

“... One of the [CSIS] officers explained that the government of Iran had developed a list of people living abroad whom it deemed a threat to the regime The Iranian government has stepped up its efforts to

kidnap and kill government officials, activists, and journalists around the world, including in the United States, according to government documents and interviews with 15 officials in Washington, Europe, and the Middle East, who spoke on the condition of anonymity to discuss sensitive information.”

- **CSIS: “These hostile activities and foreign interference undermine the security of Canada and Canadians, as well as our democratic values and sovereignty”**

“A spokesperson for [CSIS] ... said ... that the agency “is aware that hostile state actors, including the Islamic Republic of Iran, monitor and intimidate Canadian communities, with diaspora communities often disproportionately targeted. ... CSIS is actively investigating several threats to life emanating from the Islamic Republic of Iran based on credible intelligence. Ultimately, these hostile activities and foreign interference undermine the security of Canada and Canadians, as well as our democratic values and sovereignty.”

d. “They Are Here”

CSIS is currently investigating reports from Canadians who have received “credible death threats from Iran” that are “designed to silence those who speak out publicly” against Iran.³⁶² As noted by journalist Terry Galvin: “*The most dreaded threat*” to these Canadian targets of the regime “*comes from a network in Canada run by the ... IRGC Last month, a former member of the RCMP’s Integrated National Security Enforcement Team told me: ‘Yes. They are here’.*”³⁶³

e. Masih Alinejad, World Renowned Iranian Human Rights Activist:

“You hear that a lot on media that Canada is not safe. Canada is not safe, don’t go there Canada became a haven for Islamic Republic agents. Canada is a country that a lot of people have respect for. In my country, a lot of people want to come to Canada and enjoy the freedom. But now, they say that oh no, let’s not go to Canada because it’s not safe. Can you believe that?”

Mercedes Stephenson: What did the FBI tell you about the RCMP’s ability to protect you in Canada?

Masih Alinejad, Iranian Human Rights Activist: I mean, I have to thank the FBI always actually letting the police in Canada know and they are always there to protect me, but that’s – I don’t want anything for myself. I want them to protect Canada. I want them to protect people who live here. Yeah, I’m only one person. I’m not scared of getting killed. I’m not honestly scared for myself. But this is scary that in front of the eyes of the free world, we see that the Islamic Republic threatening national security of Canada and national security of America. Yes, I was told by the FBI that the same people who plotted to kidnap me; they were the same group trying to kidnap two Canadian citizens on Canadian soil. Yes, that was like public. You can read the indictment by [the] Department of Justice in America one day published that. I was like wow. Then I’m not alone. The same member of Revolutionary

Guards who are trying to kidnap me, they were after two Canadians and two U.K. citizens. That’s why I say that: where are you, the democratic countries?...”³⁶⁴

6. IRGC/Hezbollah Antisemitism as a National Security Threat

- **Iran is the “World’s Chief Trafficker in Antisemitism”**

The centrality of antisemitism and the elimination of the Jewish state as a primary objective in regime policy³⁶⁵ is featured³⁶⁶ throughout Iran’s state educational frameworks and is the driving engine of the IRGC and the regime’s other revolutionary bodies. A 2021 ADL report found that incitement to hatred against Jews and Israel are extensively interspersed throughout multiple fields of the Iran’s public educational framework such as history, religion, and social studies”, and for the IRGC, the annihilation of Israel and virulent antisemitism are theological imperatives of apocalyptic import central to its indoctrination program pervading “every aspect of its ideology”.³⁶⁷ The depth of this animus is concretized as a key pillar of the regime’s ideological tenets and foreign policy objectives.

Iran as such is also distinguished as the world’s leading state-promoter/sponsor supporter of Holocaust denial and distortion. When the UN General assembly passed a resolution condemning Holocaust denial in January 2022, the Islamic Republic was the only country that condemned³⁶⁸ and rejected this resolution.³⁶⁹ Holocaust denial and distortion has become an integrated feature within the Islamic Republic’s foreign,³⁷⁰ domestic and educational policy.³⁷¹ It is a key foundation of the entire framework of antisemitic ideation which is at the core of this regime’s ideological identity. As noted by Danny Eisen, cofounder of Secure Canada,³⁷² in an analysis of a published condemnation of Holocaust denial issued in April 2022 by the Global Imams Council (GIC) in Najaf Iraq, Holocaust denial in its various formulations is of foundational import to the regime as well as to other antisemitic entities:

Holocaust denial, distortion, and inversion³⁷³ is one of the most perverse, adaptable, and widespread of contemporary antisemitic narratives. It has become a key platform, framework and organizing principle for antisemitic extremists of almost all ideological hues. It offers a comprehensive reinvention of historical and contemporary affairs that legitimizes and incorporates within a single paradigm, virtually every and any antisemitic calumny, through a grotesquely malevolent weaponization of the Holocaust against Jews and the totality of Jewish identity. Not bound by denominational affiliation or political orientation, it is a particularly well-suited instrument for the globalization of Jew-hatred under a common global rubric.³⁷⁴

German scholar and expert in Islamist antisemitism Matthais Kuntzel similarly explains:

Holocaust denial is an extreme form of antisemitism. Whoever declares Auschwitz to be a “myth” implicitly portrays the Jews as the enemy of humankind, who for filthy lucre has been duping the rest of humanity for the past sixty years. Whoever talks of the “so-called” Holocaust suggests that over ninety percent of the world’s media and university professorships are controlled by Jews and thereby cut off from the “real” truth. In this way, precisely that sort of genocidal hatred gets incited that helped prepare the way for the Shoah. Every denial of the Holocaust thus tacitly contains an appeal to repeat it.³⁷⁵

Elan Carr, the U.S. Special Envoy to Monitor and Combat Anti-Semitism, in a 2020 report of The United States Commission on International Religious Freedom (USCIRF), describes genocidal antisemitism as a bedrock regime ethic that has established the Islamic Republic’s status as the globe’s leading state purveyor of genocidal antisemitism.³⁷⁶ According to Carr and other experts “... Iran is the ‘world’s chief trafficker in antisemitism’ and that

‘antisemitism isn’t ancillary to the ideology of the Islamic Republic of Iran. It is a central foundational component of the ideology of that regime’³⁷⁷ But antisemitism is not only an essential ideological fuel and organizing framework for the IRGC’s malign activities. It is also a crucial binding agent between the IRGC and its multiple terrorist proxies,³⁷⁸ and as confirmed by German intelligence³⁷⁹ in 2020, the IRI has unsurprisingly distinguished itself as a key exporter of this annihilationist ideology throughout the Muslim world and across the globe.³⁸⁰ This genocidal invective is stated unambiguously on the website of the regime’s Supreme Leader Ali Khamenei declaring: “There is religious ‘justification to kill all the Jews and annihilate Israel, and Iran must take the helm.’”³⁸¹

- Hezbollah also shares the regime’s and the IRGC’s genocidal loathing of Jews. This antisemitism must be seen as a national security concern given its centrality in Hezbollah ideology and its operational impact in targeting Jewish victims across the globe, including the 1994 attack on the Argentine Israelite Mutual Association (AMIA) in Buenos Aires. Prior to the October 7, 2024, Hamas attacks on Israel, the AMIA bombing had been described at the time as the “single worst act of terrorism specifically targeting a Jewish communal institution anywhere in the world”, murdering 85 people and injuring 300 more.

Secretary-General Hassan Nasrallah has attacked Jews as “enemies of God” who “invented the legend of the Nazi atrocities” and adds: “If we search the entire globe for a more cowardly, lowly, weak, and frail individual in his spirit, mind, ideology, and religion, we will never find anyone like the Jew – and I am not saying the Israeli.” Nasrallah’s other quotations include insulting the central book of Jewish law, the Talmud, by saying it promotes the “killing of women and children.” He is also on the record promising a “decisive and conclusive” battle with the Jews once they have gathered in “once place” i.e. in Israel.

7. The IRGC’s Ongoing Threat to the Global Jewish Community

- a. According to terrorism expert Matthew Levitt who has researched trends in Iranian assassination and abduction operations, between 1979 and 2021, Iran has “frequently targeted Israeli interests, including 27 incidents in the overall dataset and at least 23 cases over the past decade. Still more disturbing, however, is the prevalence of Iranian external operations apparently targeting Jews, not Israelis. (In several incidents, the operatives were targeting both.) Iranian operatives and their proxies carried out surveillance or operations specifically targeting Jews in places such as Azerbaijan, Bulgaria, Cyprus, Germany, India, Nepal, Nigeria, and the United States, including surveillance of Jewish cultural centers, synagogues, and tourists.”³⁸²
- b. The Washington Post article referenced above has also noted that the Iranian regime recently launched dozens of plots to kill its perceived enemies abroad, including Jews.³⁸³ “Over the past two years, about 13 terrorist attacks by Iran’s Revolutionary Guard Corps (IRGC) against Israeli and Jewish targets were publicly revealed and foiled on four continents,”³⁸⁴ and in December 2022, German state security sources accused the IRGC “of contracting state-sponsored terrorism against German synagogues in the state of North Rhine-Westphalia...”³⁸⁵
- c. As noted by Britain’s Community Security Trust (CST):³⁸⁶ “In February 2023, UK Security Minister, Tom Tugendhat MP, addressed Parliament³⁸⁷ about the threat of Iran and its operatives in the UK. In addition to emphasising that the Iranian Intelligence Services work with ‘organised criminal gangs’, he also provided what is almost certainly the first official acknowledgement of Iranian targeting of Jews in the UK: “Between 2020 and 2022, Iran tried to collect intelligence on UK-based Israeli and Jewish individuals. We believe this information

was a preparation for future lethal operations”. Tugendhat elaborated shortly after in an interview with the *Jewish Chronicle*:

“You can be very clear that I wouldn’t have mentioned Jewish and Israeli targets unless I had good reason to do so ... I take all threats against anyone in the UK very seriously and the reason I highlighted Israelis and the Jewish community is that we have been seeing threats and Iranian operational activity directed against them. I do not issue these warnings lightly”.³⁸⁸

d. In August 2023 British papers reported³⁸⁹ that:

Senior commanders from Iran’s Islamic Revolutionary Guards Corps (IRGC) have tried to radicalize British university students with extreme antisemitic propaganda and calls for violence Eight controversial armed forces chiefs gave speeches to Muslim students, urging them to support illegal attacks and venerate people who have carried out acts of violence, according to an investigation by the Jewish Chronicle. The paper claims the talks were hosted by the Islamic Students Association of Britain (ISA). Recordings obtained by the paper are said to reveal that one commander claimed the Holocaust was “fake”, boasted of training al-Qaeda terrorists and urged listeners to join “the beautiful list of soldiers” who would fight and kill Jews in an apocalyptic war. Another military leader allegedly claimed Jews “created homosexuality” and said students should “raise the flag of the Islamic Revolution, Islam and martyrdom” and see themselves as “holy warriors”, promising the “era of the Jews” would soon end. The talks, which were live-streamed from Iran and viewed by tens of thousands of people....³⁹⁰

e. According to David Barnea, the Director of Israel’s Mossad intelligence agency, [as of September 2023] 27 plots by Iran to murder Israelis and Jews outside the borders of the Jewish state had been foiled.³⁹¹ Later in December 2023, Intellitimes reported that “Unit 400 of the Quds Force of Iran’s Islamic Revolutionary Guard Corps (IRGC) is recruiting Afghans for suicide attacks and working with al-Qaeda to target Israelis.”³⁹²

f. A February 2023 report by the Jewish Chronicle (Britain), interviewed Catherine Perez-Shakdam, “who infiltrated the Iranian regime by becoming a trusted attendee of conferences organized by New Horizon, which comprises Neofascist parties and includes members of Hezbollah and Hamas terror groups. Perez-Shakdam discovered the regime engaged in mapping the international Jewish community and surveilling prominent Jews for potential assassination.”³⁹³

g. In February 2024, the UK’s Daily Mail reported IRGC recruiters have been approaching Shiite Muslims visiting religious sites in the Middle East and asking them to “gather information on prominent British Jews or targets such as synagogues”.³⁹⁴

h. In February 2024, Swedish authorities prevented reportedly two Afghan refugees connected to the IRGC from murdering two Jews in Sweden.³⁹⁵ On May 30, 204 Swedish intelligence officials confirmed that that Tehran is using local organizations — including the Foxtrot and Rumba crime rings – to attack Israeli and Jewish targets.³⁹⁶ As reported by Iran International: “The Swedish Ministry of Foreign ... said the revelations of plots on Swedish soil and abroad using Swedish crime gangs are being taken ‘very seriously’ It follows recent reports from the Swedish Security Service (SÄPO), which revealed that Iran-backed terror plots aim to target Iranian dissidents in addition to Sweden’s Jewish and Israeli community. In January, an explosive device, said to be a hand grenade, was found inside the grounds of the Israeli Embassy in Stockholm and destroyed by the Swedish national bomb squad. The suspects were found to be part of a gang known as Foxtrot, hired under the behest of Tehran, according to Israeli intelligence agency Mossad.”³⁹⁷

- i. Authorities have warned that these threats against Jewish communities have been significantly magnified in the aftermath of the Hamas attacks of October 7, 2023.³⁹⁸

8. The IRGC/Hezbollah Axis as a Threat to the Canadian Jewish Community

- **Canadian Jewish Community Institutions Have Been Surveilled**

As we will detail below, the IRGC/Hezbollah axis has over the years already demonstrated a malign interest in Canadian Jewish institutions. According to Canadian journalist Stewart Bell and terror financing expert Matthew Levitt,³⁹⁹ Canadian Jewish community institutions have been surveilled in the past in “potentially preoperational surveillance” by the IRGC’s Hezbollah, and Bell has provided expansive detail related to Hezbollah’s past interest and surveillance of the Jewish community in Canada in his book *Cold Terror: How Canada Nurtures and Exports Terrorism Around the World*.⁴⁰⁰

- **Hezbollah Has True Global Reach – Including Canada**

Hezbollah, one of the world’s wealthiest⁴⁰¹ and most lethal terrorist organizations has true global reach⁴⁰² and “is now operating worldwide, per Nasrallah’s statement, “Hezbollah has now become an international force”,⁴⁰³ and it is ready to act in the service of Iran “in any arena or country that Khamenei finds appropriate.”⁴⁰⁴ As described by Iran expert Dr. Yossi Mansharof: “Hezbollah’s foothold is evident across many continents ... [including] Europe (Germany, Italy, UK, France, Greece, Cyprus, Bosnia and Herzegovina), the Middle East (Syria, Iraq, Yemen, Palestinian Territories in the West Bank and Hamas in the Gaza Strip, Saudi Arabia, Bahrain, United Arab Emirates, Kuwait, Egypt, Algeria, and Morocco), Africa (Nigeria and Uganda), Latin America (Bolivia, Peru, Panama, and Argentina); the Caucasus (Azerbaijan), Russia (Palestinian students were recruited to Hezbollah and instructed to gather intelligence on US, Jewish, and Israeli targets), and Southeast Asia (Thailand, the Philippines, Singapore, and the Strait of Malacca)” and “in recent years, the arrests of three Unit 910 operatives in the United States demonstrated Hezbollah’s efforts to gather intelligence on strategic targets for possible terrorist attacks in the homelands of US and Canada.”⁴⁰⁵

- **The IRGC/Hezbollah Infrastructure in Canada**

As noted above the IRGC has a significant footprint in Canada and Hezbollah itself has had a presence in Canada for decades. Public Safety Canada confirmed in 2016 that Hezbollah has networks in Canada,⁴⁰⁶ and has observed that Hezbollah remains one of the world’s most capable terrorist groups”.⁴⁰⁷ Canadian officials and other experts have reported that Hezbollah has established a global network including Canada used “for recruitment, fundraising and procurement”,⁴⁰⁸ and has been involved in organized crime in Canada, establishing “an infrastructure that can assist and support terrorists seeking a safe haven in North America. Hezbollah members in Canada receive and comply with direction from the Hezbollah leadership in Lebanon. CSIS spokesman Gaetan Blais said ... that terrorist support would include logistics assistance, fund-raising, provision of safe houses and arms, smuggling people in and out of the United States and providing a place for planning attacks abroad. He declined to elaborate further”.⁴⁰⁹

- **The IRGC/Hezbollah Axis as a Regime Surrogate in Canada**

Hezbollah cannot be considered by Canadian officials as just another proxy of the regime’s international network of terrorist entities. The term proxy can describe any numbers of relationships or varying degrees of identification with or subservience to a given patron.⁴¹⁰ Hezbollah though has a special relationship with its Iranian sponsor financially, operationally, and most significantly – ideologically. Hezbollah therefore has been described correctly as an “operational arm”⁴¹¹ of the regime, and “a key element in the operating of pro-Iranian terrorism in the global arena ... [and] has taken on the role of the intermediary in the service of the IRGC”.⁴¹² Hezbollah’s leader Hassan Nasrallah has made its multi-billion-dollar financial relationship with the Iranian regime abundantly clear: “Hezbollah’s budget, its income, its expenses, everything it eats and drinks, its weapons and rockets, are from the Islamic Republic of Iran As long as Iran has money, we have money.” As noted by Iran expert Yossi Mansharof: “... Hezbollah has been the most successful model of the vision of ‘Exporting the Islamic Revolution’.”

But perhaps most critically Hezbollah is fully aligned like its IRGC patron in its allegiance, not to Lebanon or any other any nation state, but to the transnational tenets of Khomeini’s Islamic Revolution and to the Supreme leader; the replacement of the international order with a Khomeinist state; and the destruction of the state of Israel as a non-negotiable perquisite to human salvation. Hezbollah’s subservience to the IRI’s Supreme Leader and the IRGC have been made bluntly clear by Hezbollah who has publicly declared that “our belief of the Rule of the Jurisprudent [Iran’s Supreme Leader] is greater than of many Iranians ... The commitment to him surpasses the commitment to the [Lebanese] constitution”.⁴¹³

Hezbollah’s Capacities in Canada and its Depth of Commitment to the Regime Efforts Across the Globe, Should Therefore not be Underestimated

Given the centrality of antisemitism in regime ideology and specifically as a core engine and motivational impetus of the IRGC/Hezbollah weltanschauung, Ottawa must consider the gravity of the widely reported warnings by intelligence agencies in the U.S., Britain and Israel regarding regime and IRGC surveillance of Jewish communities across the globe for the purposes of assassinating Jewish individuals and targeting Jewish institutions. Hezbollah’s vast transnational network of criminal enterprises also extant in Canada has only enhanced this axis’ capacities to target Jews, and the use of criminal elements in this manner is in fact consistent with the regime’s modus operandi of outsourcing violent attacks against Jews and assassinations to local criminal enterprises⁴¹⁴ – a practice now also employed by Hamas, another proxy of the Iran/IRGC, in the aftermath of the October 7, 2023 terrorist attacks against Israel.

Section #3 – The Case for Listing of the IRGC in Canada – FAQs

1. Was There Parliamentary support for the IRGC listing?

- **MPs** – Over the years there has been broad bipartisan support from MPs of different parties,⁴¹⁵ for listing the IRGC including most recently Liberal MPs Anthony Housefather, Marco Mendicino, Judy Sgro,⁴¹⁶ NDP foreign affairs Critic Heather McPherson⁴¹⁷ and Conservative Opposition Leader Pierre Poilievre. Poilievre promised if elected to designate the IRGC and to “kick out every single regime, agent, or terrorist that is operating in this country.”⁴¹⁸
- **The House and Senate** – Both chambers of Parliament have supported the listing of the IRGC in its entirety. On June 12, 2018, Parliament passed a motion with the support of Prime Minister Trudeau and the vast majority of Liberal cabinet ministers and MPs, stipulating that Canada immediately designate the IRGC “as a listed terrorist entity under the *Criminal Code* of Canada”.⁴¹⁹ Shortly thereafter, Minister of Public Safety Ralph Goodale confirmed that the process had been initiated.⁴²⁰ Later in June 2023 the Canadian Senate also passed a non-binding motion to list the IRGC as a terror organization. “... Senator Ratna Omidvar⁴²¹ who has been leading the charge on an IRGC designation, stressed that “the crimes of the Islamic regime and the IRGC go beyond the borders of Iran”, citing the contribution of the IRGC to Russia's brutal invasion of Ukraine, for which Iran has supplied kamikaze drones.” Then on May 8, 2024, the House of Commons voted unanimously in support of a motion to add Iran's Revolutionary Guard Corps to an official list of terrorist organizations. The motion came from a House justice committee report that, among other things, called on the government to designate the IRGC as a terrorist entity in Canada. MPs voted 327 to 0 to accept the report.”⁴²²
- **Prime Minister Trudeau and Foreign Minister Chrystia Freeland** – In October 2022, then Minister of Foreign Affairs Chrystia Freeland stated unequivocally that “the IRGC is a terrorist organization”⁴²³; in January 2024, Prime Minister Trudeau stated that his government is looking “for ways to responsibly list the IRGC as a terrorist organization”;⁴²⁴ and on May 8, 2024, the Prime Minister again reiterated that “We will continue our work, including continuing to look for ways to responsibly list the IRGC as a terrorist organization”.⁴²⁵

2. Are There Canadian Policy Precedents for Listing Entities like the IRGC as Terrorist Entities?

Yes. There are several precedents for such a listing:

- **Canada Has Already Listed Part of the IRGC as a Terrorist Entity**

Canada designated the IRGC's Quds Force (QF) as a terrorist entity in 2012.⁴²⁶ Contrary to popular perception, the QF is not a separate body from the IRGC and has never claimed to be so. The Quds Force is one branch of the IRGC, and is an integrated component of its inner circuitry operating under a single IRGC command,⁴²⁷ recruiting its manpower from the broader ranks of the IRGC,⁴²⁸ and with IRGC-QF and other IRGC personnel “routinely rotating back and forth within one command structure”.⁴²⁹ Under the tutelage of QF leader Kassem Soleimani, killed in an American strike in Iraq 2020, all IRGC-QF commanders and deputies had previously served as IRGC provincial commanders. This fact – coupled with the Syria war, which necessitated the deployment of regular IRGC forces to reduce the burden on the IRGC-QF – has made it increasingly difficult to

distinguish between the career tracks taken by leaders in each force”.⁴³⁰ As noted by the United States Institute of Peace (USIP), the IRGC works hand in hand with the IRGC-QF in multiple areas of terrorist endeavour across the globe.⁴³¹ In particular, the QF’s works closely with IRGC’s intelligence branch,⁴³² which also operates abroad,⁴³³ and has been involved in the “neutralization of Iranian opponents”.⁴³⁴ The Council on Foreign Relations (CFR) therefore correctly describes *both the IRGC in its entirety and the IRGC’s Quds Force* as Iran’s “primary mechanism for cultivating and supporting terrorists abroad”.⁴³⁵

There is therefore a glaring incongruity in listing only the IRGC’s QF which facilitates Iran’s terrorist foreign policies abroad, without targeting the IRGC itself whose terrorist résumé rivals or exceeds the exploits of most, if not all, of the terrorist organizations presently listed by Canada. Additionally, failing to do so greatly undermines and diminishes the import and impact of the QF listing itself, by exempting the vast IRGC military, intelligence, economic, educational, and political infrastructure that supports and underpins the QF and its activities. The relatively small IRGC-QF plays “only a small role in the IRGC’s vast business ventures, which it uses to fund its [QF] terrorist activities”.⁴³⁶ Former U.S. Senator Jon Kyl correctly noted in this regard that the IRGC as a whole must be held accountable as a terrorist entity if nothing else for its support and collaboration with QF activities: “[It is] like saying the Mafia isn’t really responsible for what the Mafia does; it is only their hit men. The Quds Force is the group of hit men for this entity. This entity is clearly the overall entity responsible for this action, and it is the entity that engages in the economic activity which supplies the financial resources to the Quds Force.”⁴³⁷

- **Canada Argued Successfully Before the Supreme Court in 1997 that the Iranian Ministry of Intelligence and Security (MOIS) Should be Considered a Terrorist Entity**

The proposition that a state agency could be defined as a “terrorist organization” for certain legal purposes also has a precedent in Canadian jurisprudence, as demonstrated in the case of Mansour Ahani. Mr. Ahani was an Iranian national who acquired refugee status in Canada in 1991. CSIS argued that Ahani was an assassin working for the Iranian Ministry of Intelligence and Security (MOIS). In June 1993, Canada issued a certificate declaring Ahani to be inadmissible both as a member of a terrorist organization and as one who there are reasonable grounds to believe has engaged or will engage in acts of terrorism or violence that “would or might endanger the lives or safety of persons in Canada”.⁴³⁸ In other words, the Canadian government deemed a state agency – in this case MOIS – to be a terrorist organization, and the Supreme Court of Canada upheld that decision.⁴³⁹

- **Other Precedents**

On May 9, 2013, the Government of Canada listed the Taliban as a terrorist entity under the *Criminal Code*.⁴⁴⁰ The Taliban were designated and remain so despite the fact that they are the current government of Afghanistan.⁴⁴¹ Similarly, Hamas was not removed from Canada’s terrorism list when it won Palestinian elections in 2006, and Hezbollah was not removed from the list despite forming part of the Lebanese government for most of the period since 2005. Enabling the use of a constitutional guise by autocratic states serving to legitimate and protect terrorist entities from sanction is no different than recognizing the legitimacy of sham corporations founded to shield criminal endeavour from legal sanction.

3. Are There Any Canadian Judicial Precedents or Findings on the Status of the IRGC as a Terrorist Entity?

Over the last decade the IRGC has been named alongside the Iranian government as defendants in several successful lawsuits in Canada launched by terror victims under the *Justice for Victims of Terrorism Act* (JVTA). Canadian courts have awarded billions of dollars of damages to terror victims for acts of terrorism committed or sponsored by Iran, the IRGC, and their proxies.⁴⁴²

In May 2021, an Ontario Superior Court of Justice found⁴⁴³ Iran, the IRGC, and other defendants liable for the January 2020 shutdown of Ukraine International Airlines Flight PS752 and awarded the plaintiffs \$107 million in damages.⁴⁴⁴ The IRGC shutdown took the lives of 176 people, including 55 Canadians, 30 permanent residents, and dozens more on their way to Canada. Justice Belobaba concluded the defendants' actions were an intentional act of terrorism and constituted "terrorist activity".

The court's findings on PS752 were then referenced and reinforced in *Bunker et al. v. Veal*⁴⁴⁵ in October 2022 in which the court found that "not only did the IRGC meet the definition of a terrorist group, it was also a 'listed entity by association' because of its relationship to the Qods Force": "I agree with the Applicants that the IRGC cannot be seen to be other than a terrorist organization given the findings in Zarei. I also agree with the Applicants that even if one argues that the Qods Force is the only listed entity, then the IRGC becomes a listed entity by association." In August 2023, the Ontario Superior Court of Justice again awarded more than \$142 million to the families of eight people who died in the PS752 shutdown finding Iran, its Supreme Leader, and the IRGC liable for the shutdown under the JVTA.⁴⁴⁶

In a subsequent proceeding in January 2024, the Ontario Superior Court of Justice also enforced a United States District Court judgment against Iran for its role in the 1996 Khobar Towers bombing in Dhahran, Saudi Arabia. The Ontario court recognized the U.S. judgment in Canada, affirming the sum of US \$93,450,000 to be paid to the claimants.⁴⁴⁷ The court noted that "Iran and the IRGC both engaged in facilitating and funding terrorism contrary to sections 83.02 and 83.19 of the *Criminal Code*, by providing funding, training, sponsorship and travel necessary to carry out the bombing"; and that "The Islamic Republic of Iran is set out on the list referred to in subsection 6.1(2) of the SIA, as required under s. 4(5) of the JVTA. The IRGC is included in regulation SOR/2022-284 under the *Criminal Code*, which establishes a list of entities for the purposes of Part II.1 of the *Code*. The IRGC committed the acts for the benefit of or in relation to Iran."⁴⁴⁸

4. Should the IRGC be Exempted from Listing Due to its Ostensible Status as a State Entity?

- The IRGC as mandated in the Islamic Republic's 1979 constitution; as self-declared by the IRGC itself; and as confirmed by the IRGC's actions and activities and by expert opinion, is a sui generis entity that is congruently many things but is hardly analogous to other state or military entities, as we will argue below. But even assuming that the IRGC is indeed a state entity of some sort, there are as detailed above, multiple Canadian precedents for designating state or quasi-state entities as banned terrorist entities.
- Furthermore, the *Criminal Code* provisions governing terrorism listings clearly allows the designation of the IRGC as a banned terrorist entity. Under Canadian law the government may proscribe any entity if, on the recommendation of the Minister of Public Safety and Emergency Preparedness, the government is satisfied that there are reasonable grounds to believe that: the entity has knowingly carried out, attempted to carry out,

participated in, or facilitated a terrorist activity; or the entity has knowingly acted on behalf of, at the direction of, or in association with such an entity. The *Criminal Code* further exempts acts committed during armed conflicts, and that at the time and place of its commission is in accordance with customary international law and the laws of armed conflict, or activities undertaken by military forces of a state in the exercise of their official duties so long as the laws of armed conflict govern those activities. The impeccable terrorist credentials of the IRGC in its entirety have rivaled or exceeded the exploits of most, if not all, of the terrorist organizations presently listed by Canada. And clearly, IRGC's criminal conduct domestically and internationally cannot be substantiated as part of a state force's official duties, nor is it in compliance with international law or the laws of armed conflict. And undoubtedly IRGC sponsored terrorist attacks murdering and injuring civilians across the globe cannot be considered having been committed during "an armed conflict".

- Moreover, the Islamic Republic of Iran itself was designated by Canada as a State Supporter of Terrorism after the passage of the *Justice for Victims of Terrorism Act (JVTA)*. If the Iranian state itself is so listed there should be no impediment in listing the IRGC as this state's primary instrument in promoting global terrorism, for which this state was originally listed.
- Additionally, refraining from listing an entity like the IRGC which has earned the designation, would undermine the deterrence impact and import of the listing process itself by creating a perverse incentive for countries like Iran, Afghanistan or any other malign regime to incorporate terrorist proxies into their state apparatus protecting them from listings, and Canada has clearly and correctly rejected this proposition. Hamas was not removed from Canada's terrorism list when it won Palestinian elections in 2006, and Hezbollah was not removed from the list despite forming part of the Lebanese government for most of the period since 2005. Enabling the use of a constitutional guise by autocratic states serving to legitimate and protect terrorist entities from sanction is no different than recognizing the legitimacy of sham corporations founded to shield criminal endeavor from legal sanction, which under Canadian law would result in the lifting of the corporate veil of to allow for criminal prosecution.

5. Should the IRGC Be Considered as an "Armed Force" of Another Country?

a. Confounding Categorization: The IRGC is a Sui Generis Entity

Mohsen Sazegara, a founder of the IRGC: *There is "no other organization in any country like the Revolutionary Guard".... "Something like the Communist Party, the KGB, a business complex and the mafia ... a kind of a government inside the government of Iran" ... that doesn't "answer to anybody."*

Scholars have noted the difficulty of categorizing the IRGC. Vahid Pay and Andrew Omand of the University of Oxford put it as follows: "Ostensibly part of the state's security apparatus, it [the IRGC] is an organization that defies easy categorization. It is simultaneously an organized political bloc, a plutocratic economic behemoth, an ideological and moral enforcer, a religious seminary, a technical research institute and a comprehensive university, a paramilitary force, intelligence agency, and an orchestrator of regional proxy militant groups. Internationally, it is an organization

with few counterparts.”⁴⁴⁹ Their observations echo those of Mohsen Sazegara, a founder of the IRGC, now an Iranian dissident and a fellow at Harvard University, who stated that there is no “other organization in any country like the Revolutionary Guards”. He describes it as a sort of hybrid, “something like the Communist Party, the KGB, a business complex and the mafia ... a kind of a government inside the government of Iran,”⁴⁵⁰ that does not “answer to anybody.”⁴⁵¹

b. The Sui Generis IRGC Reflects the Founding Principles of the Regime’s Anomalous Constitution

British Prime Minister Tony Blair: *While Iran is often viewed mistakenly “as a state with an ideology” – it would in truth be more accurately defined “as an ideology with a state”.*⁴⁵²

On May 8, 2024, the Canadian parliament unanimously passed a motion to have the IRGC in its entirety listed as a proscribed terrorist entity under Canadian law.⁴⁵³ Shortly thereafter on May 11, 2024, Iran’s Ministry of Foreign Affairs issued a public condemnation of the motion, asserting amongst other things that, “The IRGC is a sovereign institution that has emerged from the context of the great and powerful nation of Iran and has an official and legal identity derived from the Islamic Republic of Iran’s Constitution,”⁴⁵⁴ and “counseled the Canadian lawmakers to research the IRGC’s standing in Iran in order to get the relevant information.”⁴⁵⁵ We concur that Canadian lawmakers should indeed have a better understanding of the IRI’s constitution⁴⁵⁶ and the IRGC’s “standing” which will in fact only strengthen the arguments that the IRGC is a sui generis institution that is not analogous to other “state” entities, and that Canada was correct to follow through on the non-binding motion and list the IRGC as a terrorist entity. A short overview of the IRI’s anomalous constitutional framework and IRGC’s constitutional status will follow below.

1. The IRI Constitution⁴⁵⁷: Undefined Iran as a Nation State and Recalibrates as a Revolutionary Cause

- While the IRGC is formally recognized in the IRI’s constitution and provides the basic framework for its anomalous ideological mandate, it must be noted that the regime’s founding document is not easily comparable to other constitutional frameworks. The underlying foundations of the Islamic Republic as formulated in its constitution and articulated in multiple documents and statements by its framers,⁴⁵⁸ are markedly different from even those of most other authoritarian regimes. As such, the legitimacy of Iran’s constitutional framework as a basis for understanding both the regime itself and the legitimacy of the IRGC’s sui generis mandate which embodies the regime’s revolutionary ethos as defined in the constitution, must be scrutinized in this context.⁴⁵⁹
- The challenge of categorizing this regime or its founding documents was summed up in a simple proposition by Henry Kissinger who wrote that: “Iran’s leaders must decide whether they are representing a cause or a nation – whether their basic motivation is crusading or international cooperation.”⁴⁶⁰ The regime in fact has answered his query unequivocally. Over the last four decades Iran’s actions and policies, consistent with its clearly articulated constitutional imperatives, have demonstrated that the regime perceives its very identity not as that of a nation-state in any normative sense, but as the embodiment of and a platform for a cause – the “Islamic Revolution” – which has been the driving force underpinning every area of regime policy since its founding in 1979. As declared unambiguously by regime founder Ayatollah Khomeini: “We do not recognize a country named Iran. We have

an Islamic republic located in Iran ...⁹⁶ whose objective is to fight a “war ... of ideology” and export “our revolution to the whole world” to establish an Islamic state “world-wide”.⁴⁶¹ The pivotal significance of “exporting the Revolution” as a core pillar of the regime’s identity was underscored by former Iranian President Ali Akbar Hashemi Rafsanjani, who once stated that “revolutionarism” is the essence of the regime – without it, Iran would become an ordinary country.”⁴⁶² Put another way by Iran experts Ali Ansari and Kasra Aarabi at Tony Blair Institute for Global Change: “The Iranian state is there to serve the revolution, not the other way around.”⁴⁶³

- Put another way by former British Prime Minister Tony Blair, while Iran is often viewed mistakenly “as a state with an ideology” – it would in truth be more accurately defined “as an ideology with a state”.⁴⁶⁴ As such, despite the usage by the regime of certain structural formulations borrowed from other constitutional frameworks in crafting its “constitution”, this document has been described by experts as being fundamentally different from “all other modern constitutions”.⁴⁶⁵ This difference is abundantly clear in the preamble which elucidates its distinct and primarily ideological character and intent, focusing on the centrality and uniqueness of the regime’s very identity not as a contemporary continuance of Iran as a nation state but as a revolutionary movement “which distinguishes it from other movements that have taken place in Iran during the past hundred years”, and its grounding in the imperative of the Revolution’s export as the constitution’s foundational principle: “*The basic characteristic of this revolution, which distinguishes it from other movements that have taken place in Iran during the past hundred years, is its ideological and Islamic nature [T]he Constitution provides the necessary basis for ensuring the continuation of the Revolution at home and abroad. In particular, in the development of international relations, the Constitution will strive with other Islamic and popular movements to prepare the way for the formation of a single world community.... [a]nd to assure the continuation of the struggle for the liberation of all deprived and oppressed peoples in the world.*”⁴⁶⁶
- This underlying axiom of Khomeinist ideology has guided the regime’s policies since its inception. It has laid the ideological groundwork for Iran’s ascendance as the globe’s most egregious state sponsor of terrorism and is entirely consistent with Khomeini’s publicly stated goal which “was never a state” but the expansion of the Revolution as a new global order.⁴⁶⁷ Seen through this lens, Iran’s “constitution” is a not simply a version of “a republican constitution made consistent with an extremist Shi’ite Islam”.⁴⁶⁸ It is more of a founding mission statement – a manifesto in a constitutional guise – for a theologically premised pan-Islamist movement openly seeking the destruction of the international order and the pursuit of global Islamist hegemony under the reign of Iran’s Supreme Leader.⁴⁶⁹ Its “constitutional” constructs and instruments have been structured and mandated to pursue that goal which was later formulated by the current Supreme Leader Ayatollah Khamenei in a five-stage “generational” program to create “a transnational Islamic system”⁴⁷⁰ for the Revolution’s ultimate global triumph. So, whereas the constitutional frameworks of other nations are focused on structuring and maintaining the political identity and integrity of the nation state, Iran’s constitution is designed to “undefine” Iran as a nation-state and to redefine it as a cause⁴⁷¹ that repudiates the very idea of nation-states and their right to sovereignty as such, and is committed in principle to their destruction.⁴⁷² The constitutional language describing the IRGC’s revolutionary mandate, not as the armed forces of Iran the country, but as an “ideological army”⁴⁷³ and “protector of the Revolution and its achievements” is therefore fully consistent with this document’s doctrinal intent and objective.

2. The IRI Constitution is Not Bound by Its Own Provisions – It Should Not be Binding on Canada

“None of the actors in the Islamic Republic, apart from the supreme leader, is an independent centre of power; these actors do not have power in their own right and are not sovereign bodies. There is one centre of power in the Iranian regime: the supreme leader.”

- Iran’s constitution itself stipulates the mutability of its own constitutional framework. It can be adjusted or overridden at the discretion of Iran’s Supreme Leader whose power is grounded in Khomeini’s theocratic doctrine of *velāyat-e faqīh* (lit. “mandate of the jurist”) – “a divinely chosen, infallible leader with a mandate akin to that of the Prophet and the Twelve Shia Imams.”⁴⁷⁴ It is an inviolable constitutional and theocratic doctrine of the Iranian regime, providing the Supreme Leader absolute authority⁴⁷⁵ not only over the affairs of the entire Muslim *ummah* (nation) – but, as articulated by senior cleric writing in a series of editorials under orders of Khomeini, over “the entire world and all that exists in it, whether earthbound or flying creatures, inanimate objects, plants, animals, and anything in any way related to collective or individual human life, all human affairs, belongings, or assets”.⁴⁷⁶ The Supreme Leader has virtually unlimited political power. He can suspend not only the constitution but even the basic principles of Islam if the interests of the Revolution require it.⁴⁷⁷ In Khomeini’s revolutionary ideology “Safeguarding the regime is a religious duty above all duties. ... Thus, the theory of the guardianship of the Shiite jurist is not designed to implement Islamic law but rather to give legitimate authority to the jurist to ignore it. ... [R]eligion is only a tool for justification and not a rule to be bound by.”⁴⁷⁸
- In the words of Iran expert Said Amir Arjomand: “Khomeini’s position as Leader of the Constitution endowed him with extra-constitutional powers of the Supreme Jurist and ensured his continued supremacy over the constitution... The [Supreme] Leader is the clerical monarch ruling with more extensive powers than any constitutional monarch or elected president in the world.”⁴⁷⁹ Iranian dissident Mohsen Sazegara, a founder of the IRGC now at Harvard, put it succinctly: “Iran has a constitution and specific laws that on closer scrutiny turn out not to be laws at all, because they can be interpreted in any way to the advantage of the rulers.”⁴⁸⁰
- *The regime’s constitution therefore is a manifesto for the absolute and divinely sanctioned rule of the Supreme Leader not bound by constitutional fiat or even Islamic law. If Iran itself is ultimately not bound by its own constitution or legal framework but only by the dictates of that leader there is no reason Canadian policy should be bound or impeded by Iran’s constitutional dictates in listing the IRGC.*

3. The IRGC was Never Mandated in the IRI Constitution as a Conventional Military Force

Iran Experts Saeid Golkar and Kasra Aarabi: “Tracking the development of the IRGC reveals that it is anything but a conventional state armed force and any discussion about it should start by acknowledging this.”

- As noted by Iran experts Saeid Golkar and Kasra Aarabi: “What began as an armed Islamist militia in 1979 with fewer than 500 members transformed itself into a state within a state with its own economic, political, intelligence, and cultural arms. Tracking the development of the IRGC reveals that it is anything but a conventional state armed force and any discussion about it should start by acknowledging this.”⁴⁸¹
- The IRGC in fact was never mandated in Ayatollah Khomeini’s 1979 constitution as the conventional armed forces of Iran. The constitution bestowed this responsibility on the conventional armed forces of Iran called the Artesh, whose primary objective stipulated in Article 143 of the constitution, is protecting the territorial integrity of Iran as a nation state.⁴⁸² Notably, the IRGC in Article 150 is not charged with this responsibility”.⁴⁸³ Whereas the Artesh was mandated clearly with defense of the country, the IRGC was tasked specifically in a separate provision with defending of the Islamic Revolution and its leadership. From its inception, the IRGC was established as an “ideological army”⁴⁸⁴ specifically mandated constitutionally and in the IRGC’s self-declared mission statements, to protect and export Ayatollah Khomeini’s Islamic Revolution “by any means possible”⁴⁸⁵ with “an ideological mission of jihad in God’s way; that is extending sovereignty of God’s law throughout the world”.⁴⁸⁶ Put differently, the IRGC is tasked domestically not with protecting the Iranian people from its enemies but with protecting the clerical leadership of Iran and its Revolution both domestically and transnationally from its enemies which also included the Iranian people themselves, while concomitantly propagating Iran’s violent revolutionary doctrine across the globe.
- While the IRGC eventually developed a robust military dimension, its foundational mandate and purview differs structurally, ideologically and methodologically from that of most conventional armed forces of a state and should not be compared to those of other countries or even other autocracies As explained by Dr. Hassan-Yari of the Royal Military College of Canada, the Guard’s mandate initially focused on “monitoring of citizens' activities, enforcement of the dress code, and the seizure of material not favored by the regime *The IRGC's core domestic mission, in practice, can thus be described as being ideological, political, and partly economic in nature, while carrying out both military and security duties*”.⁴⁸⁷ The IRGC only developed its more conventional military dimensions several years after its founding yet retained its functions as an ideological force mandated to protecting and advancing the export of the Islamic Revolution through military and non-military means. It was founded not as a military force but more as an “institutionalized militia” to protect the “achievements of the

Revolution” and to export the Islamic Revolution through violence to the “four corners of the earth”⁴⁸⁸. Its militarization is only one part of its multi-faceted ideological framework, including a plethora of endeavors far removed from those of an state armed force, all devoted to fulfilling its mandate not as Iran’s defender but as “protector” or “custodian” of a transnational Islamic Revolution, and exporting the Revolution abroad to fulfill Khomeini’s goal of creating a “transnational Islamist utopia”.⁴⁸⁹

- The IRGC’s constitutional mandate is defined vaguely as the “protector of the Revolution and its achievements” leaving its “scope of the duties ... and its areas of responsibility, in relation to the duties ... of the other armed forces ... to be determined by law”.⁴⁹⁰ So, whereas the Artesh was mandated only with defense of the country, the IRGC was tasked with defending of the Islamic Revolution and its leadership. This mandate defining the IRGC as the “the ideological custodian”⁴⁹¹ of the Revolution is malleable and broad, and its parameters are undefined unlike that of the Artesh or any other normative armed force of a state entity. The constitution itself also does not “define the enemies against which the IRGC is obliged to guard the revolution ”⁴⁹² or provide any limitation to specific areas of IRGC purview, leaving its field of operation open to multiple arenas of revolutionary endeavor not necessarily military in nature.
- Furthermore, the initial structure of the IRGC as a militia numbered only about 10,000 men at its inception,⁴⁹³ and many of its senior rank had trained with Palestinian terrorists in Lebanon prior to 1979.⁴⁹⁴ As indicated by its small size, The IRGC unlike the Artesh, was never intended to be a normative military institution. As explained by Yusuf Mubarak, a Bahrain-based military researcher: “The Guard, which makes up about 10% of Iran’s overall armed forces ... is considered Iran’s core military force when it comes to *protecting the government* IRGC members have been systematically isolated – and engineered demographically and ideologically – to be indifferent to the people of Iran should they be ordered to oppress them”⁴⁹⁵
- Even the Guard’s self-defined scope of its constitutionally mandated activities as issued by the IRGC in 1980,⁴⁹⁶ were non-military in any conventional sense, and in 1982 the IRGC again publicly reiterated its ideological as opposed to military function, defining two main tasks: “guarding the principle of government by the Supreme Jurist and the principle of jihad”,⁴⁹⁷ which includes the export of the Revolution “under the tutelage of the leader of the Revolution of the Islamic Republic”.⁴⁹⁸ Both tasks are focused once again on the IRGC’s mandate as the vanguard of a transnational ideological revolutionary movement and loyalty only its leader – as opposed to a normative military mandate of loyalty to the state, its territorial integrity, and its institutions.
- This hybrid pliable mandate was eventually enshrined in Iranian law with passage of the “Statute of the Islamic Revolutionary Guard Corps” on September 6, 1982,⁴⁹⁹ providing the “proponents of the Guard’s expansionist role”⁵⁰⁰ a legal framework to justify the IRGC’s borderless purview, which however one might define it, is hardly that of the armed services of a nation-state.

4. The IRGC – A State unto Itself Rather Than a State Institution Subject to the State

The Council on Foreign Relations (CFR) similarly stated that the IRGC “was deliberately founded to act outside of state institutional frameworks and operate “beyond the bounds of the law and the judiciary”.

- **Not Bound by Constitutional or State Frameworks**

Since its inception, the IRGC, has not been confined by normative definitional and legal limitations ordinarily associated with state entities, or subject to the constraints of even an autocratic constitutional order in the usual sense of those words. As explained by Iran scholar Ali Alfoneh: “The IRGC now interprets its operational

freedom so broadly that it accepts no constitutional restrictions.”⁵⁰¹ The Council on Foreign Relations (CFR) similarly stated that the IRGC was *deliberately* [emphasis added] founded to act outside of state institutional frameworks and operate “beyond the bounds of the law and the judiciary”.⁵⁰²

- **Autonomy from the State**

As further noted by other experts like Magnus Ranstorp, Francis Fukiyama, Wilfried Buchta and Mehdi Khalaji,⁵⁰³ the IRGC is a “multi-headed dragon”; a “semi-autonomous” power⁵⁰⁴; a “state within a state”⁵⁰⁵; “a kind of government within the government of Iran”,⁵⁰⁶ “devoid of any governmental oversight”,⁵⁰⁷ with “no checks or balances”⁵⁰⁸; “that has resisted any subordination to any civilian authority”⁵⁰⁹ and is “free to shape the country’s policy orientation as they wish”.⁵¹⁰ Put succinctly by an expert at RAND, the IRGC is “the only institution in Iran capable of both enforcing and breaching any red lines.”⁵¹¹ These anomalies and the IRGC’s control⁵¹² of vast swaths of Iran’s multi-billion-dollar legal and illegal economies, educational networks and increasing control of Iran’s political framework, render the IRGC as something other than an entity subservient to a state structure or the “armed services” of another country. It is more akin to what one scholar described as an “institutionalized militia” whose unusual category of agency was also noted in the findings of U.S. District Judge Royce Lamberth in *Blais v. Islamic Republic of Iran* in 2006 that described the Guard as: “... a non-traditional instrumentality of Iran. It is the military arm of a kind of shadow government ... It is similar to the Nazi party’s SA organization prior to World War II. The IRGC actively supports terrorism as a means of protecting the Islamic revolution that brought the Ayatollah to power in Iran in 1979. It has its own separate funding sources”⁵¹³

Although the IRGC is clearly part of the formal governmental structure of Iran and is ostensibly answerable to the Supreme Leader, the IRGC often acts autonomously, remaining largely unaccountable for its actions. Given the level of operational control, independence from government hierarchy, and economic self-sufficiency, the IRGC cannot be considered a state entity supported by and answerable to state institutions. Its extensive autonomy from government control and accountability renders it much more akin to a non-state actor for the purposes of listing it as a terrorist entity in Canada. Like other terrorist organization, it is an ideologically driven entity that engages in acts of terrorism often on its own volition and develops military, business, criminal, social and cultural capacities to advance its agenda. The fact that the IRGC also executes other tasks on behalf of the government does not alter that fact. It simply perhaps makes it at best into a hybrid that has been described by James Russell and others as a quasi-governmental organization.⁵¹⁴

5. The IRGC – Eschewing Loyalty to the “Country Called Iran”

The IRGC’s loyalties “are neither to Iran nor bound by geography. The political entity that they serve is transnational.”

- As opposed to those conscripted to the Artesh, the IRGC recruits largely if not exclusively from the ranks of volunteers like the Basij militia (for more on the Basij see Section #1-12), and others with impeccable credentials

of loyalty to the regime and its ideology, to ensure that the IRGC remains an ideologically reliable force. Lest there be any doubt as to the intent of that mandate, the Guard's publicly promulgated doctrines and curriculum fully explicate its *raison d'être* as an entity, demanding absolute commitment to violently advancing Khomeinist theology; unflinching loyalty to the Islamic Revolution; and blind submission to the inviolability of Iran's Supreme Leader. Violence as an ethical imperative both in the domestic and global context are a central theme in the IRGC's ideological canon.⁵¹⁵ As noted by Behnam Ben Taleblu in his review of Afshon Ostovar's *Vanguard of the Imam: Religion, Politics, and Iran's Revolutionary Guards*, violence is essential to the IRGC worldview: "Conflict is not just crucial to the Guard Corps' origins and evolution, but a unifying force that sustains the Islamic Republic. Indeed, conflict animates the regime's institutions and vindicates its worldview Central to the IRGC's self-perception is the waging of earthly struggle for celestial objectives. Charged with preserving the Islamic revolution, the Guards rely on the existence of continuous conflict with an adversary deemed hostile to their identity."⁵¹⁶ This is hardly a normative military mandate and constitutionally stands in clear contradistinction to that of the Artesh whose responsibilities are more in line with those of the armed services a state.

- As opposed to those conscripted to the Artesh, the IRGC recruits largely if not exclusively from the ranks of volunteers like the Basij militia (for more see question #6 below) and others with impeccable credentials of loyalty to the regime and its ideology, to ensure that the IRGC remains an ideologically reliable force. Lest there be any doubt as to the intent of that mandate, the Guard's publicly promulgated doctrines and curriculum fully explicate its *raison d'être* as an entity, demanding absolute commitment to violently advancing Khomeinist theology; unflinching loyalty to the Islamic Revolution; and blind submission to the inviolability of Iran's Supreme Leader. Violence as an ethical imperative both in the domestic and global context are a central theme in the IRGC's ideological canon.⁵¹⁷ As noted by Behnam Ben Taleblu in his review of Afshon Ostovar's *Vanguard of the Imam: Religion, Politics, and Iran's Revolutionary Guards*, violence is essential to the IRGC worldview: "Conflict is not just crucial to the Guard Corps' origins and evolution, but a unifying force that sustains the Islamic Republic. Indeed, conflict animates the regime's institutions and vindicates its worldview Central to the IRGC's self-perception is the waging of earthly struggle for celestial objectives. Charged with preserving the Islamic revolution, the Guards rely on the existence of continuous conflict with an adversary deemed hostile to their identity."⁵¹⁸ This is hardly a normative military mandate and constitutionally stands in clear contradistinction to that of the Artesh whose responsibilities are more in line with those of the armed services a state.
- Significantly as noted by experts, the IRGC's loyalties "are neither to Iran nor bound by geography. The political entity that they serve is transnational and more than anything, defined by the place of the supreme leader"⁵¹⁹ and the IRGC's vast apparatus of indoctrination for all IRGC recruits has prioritized loyalty in recruits – not to Iran or its institutions as a nation-state – but to the Khomeinist pan-Islamist creed which eschews patriotic or nationalistic loyalties to any individual state, *including Iran*. This precept is a core article of IRGC faith, and the regime has gone to great efforts to purge the Guard of those holding objectionable Iran-centric sensibilities,⁵²⁰ which Khomeini attacked on multiple occasions throughout his tenure. The Ayatollah derided such notions of national identity or sovereignty "as a form of *sherk*, a Koranic term meaning associating other gods with Allah,⁵²¹ the "one unforgivable sin in Islam".⁵²² "The idea is that loyalty to Allah should be exclusive. The homeland of a Muslim is his faith."⁵²³ Khomeinist anathema to Iranian nationalistic sensibilities was explicit: "[A]ll this talk about ... what we should do for Iran is incorrect We do not recognize a country named Iran. We have an Islamic republic located **in Iran**⁵²⁴ German scholar Matthias Kuntzel similarly quotes Khomeini as stating that "We do not worship Iran, we worship Allah. For patriotism is another name for paganism. I say let this land [Iran] burn. I say let this land go up in smoke, provided Islam emerges triumphant in the rest of the world."⁵²⁵

- As noted by Oxford Professor Vihad Pat and other scholars,⁵²⁶ “IRGC textbooks make no mention of Iran or Iranians in the framing of their mission thus making the materials (and the ideology) more accessible for non-Iranian Shi’a militias, ” reaffirming “that the goal of the IRGC – and indeed Iran’s revolutionary ideology – is to promulgate and ensure the survival of the ideology of *velāyat-e faqīh*”,⁵²⁷ which transcends borders or other forms of national identity, and which as we noted above is the Guard’s prime directive.⁵²⁸ Khomeini repeatedly stated this trans-Islamic objective “was of highest necessity among all that is required ... even fundamental religious practices”,⁵²⁹ and “takes priority over all subsidiary precepts, even over praying, fasting and pilgrimage ... And [it] can abandon every commandment ... which is against the expedience of Islam”.⁵³⁰ The preeminence of the *velayat* for the IRGC recruit as the primary loyalty therefore even supersedes Islamic practice, and as a “warrior without borders”⁵³¹ any allegiance to any nation-state including Iran. The omission of Iran as a nation state from the texts of its vanguard fighting force and the declared embodiment of the regime’s foundational ethos is instructive indicating that “the ‘nation’ that the IRGC is fighting for, is not so much the country of the Islamic Republic of Iran, but the Islamic Ummah, or a subset of the Shi’a community, to which the interests of Iran are subordinated”.⁵³² This hardly comports with the contours of the “armed forces” of a nation state other than perhaps the ISIS caliphate that was built on an ideological framework not dissimilar in this respect to the IRI.
- The IRGC’s deputy commander Ali Fadavi left no room for doubt as to the IRGC’s full embrace of this Khomeinist precept, stating bluntly that the IRGC does not even mention “Iran” in its name.⁵³³ Furthermore the Guard’s “training modules make no reference to Iran, referring to the mission of the IRGC in Shia Islamist, not Iranian nationalist terms This rejection of nationalism and the Westphalian notion of the nation-state is fundamental to the group’s identity”.⁵³⁴ Even visually, the IRGC’s emblem has no reference to nationalism or patriotism⁵³⁵ considered anathema to the regime’s theo-ideological dictates. As such, the IRGC cadres themselves do not self-identity as “soldiers” but as “mujahideen”, utilizing religious terminology associated with members of other Islamist terrorist entities who broadly share their theological aversion to the nation-state modality, and their commitment to establishing global Islamic rule.⁵³⁶
- It is this concept that enables the IRGC to define itself as “an Islamic army”⁵³⁷ representing a revolution and not a state, thereby laying the groundwork for its mandated role in “protecting” that revolution by brutally repressing its own citizenry. By de-nationalizing Iran as a nation-state, “and making it ... an ideological cause ... an internal opponent can be positioned as an ideological enemy ... even if they are Iranian.”⁵³⁸ The IRGC then is essentially a transnational force in the cause of a transnational cause unbound by borders. Put succinctly by IRGC’s commander Yahya Rahim Safavi, chief commander of the IRGC between 1997 and 2007, “[t]he IRGC has no geographical border. The Islamic revolution is the border of the IRGC.”⁵³⁹ By its own definition then the IRGC

does categorize itself as the armed forces of country or a people but as an often-autonomous vanguard of a transnational movement committed to an ideological terrorist ethic.

6. Conclusion

- *In summary, Iran's “constitution” is sui generis in its formulation, intent and objective. There is no comparable founding document for any other contemporary country. It is more akin to a mission statement for a theologically premised global movement designed to foster perpetual enmity of Iranians and Muslims towards the global community and to create a national and theological imperative to commit acts of terrorism and other egregious*

violations of international law in order to undermine the sovereignty of other nations. Whereas constitutions generally provide limits on power, this “constitution” actually does the opposite, providing unlimited power to a single person – the Supreme Leader – and creating governmental structures that can simply be dismissed or dissolved at his whim. As described by Iranian dissident Mohsen Sazegara and a founder of the IRGC: “Iran has a constitution and specific laws that on closer scrutiny turn out not to be laws at all, because they can be interpreted in any way to the advantage of the rulers.”⁵⁴⁰

The regime’s constitution therefore is a manifesto for the absolute divinely sanctioned rule of the Supreme Leader not bound by constitutional fiat or even by the laws of Islam. If Iran itself is ultimately not bound by its own constitution but only by the dictates of that leader there is no reason Canadian policy should be bound or impeded in listing the IRGC by Iran’s constitutional dictates.⁵⁴¹ Furthermore a “constitution” which inherently denies the legitimacy of other states and religions, seeks their destruction or submission, and whose constitutional agencies are openly mandated to propagate that ideology, should not be granted the considerations and legitimacy it does not afford others.

- Defining the IRGC as a “branch of the armed forces” of another country therefore is a misnomer. The IRGC was never established constitutionally as a conventional armed force, has not acted as such, and does not regard itself as such. It is mandated in Iran’s constitution primarily with the amorphous task of “protecting the Revolution and its ideals”, unlike the Artesh, Iran’s conventional military, that is charged with the normative military role of protecting Iran from conventional territorial threats.
- The IRGC is a sui generis entity which began “as an umbrella of Islamist militias that acted as the clergy’s bodyguards and helped them consolidate power in post-revolutionary Iran”.⁵⁴² They were non-state actors originally trained by Palestinian terrorist groups, coopted into an ostensible constitutional framework as an ideological army largely free of judicial and constitutional boundaries. As an entity whose mandate is almost borderless, the IRGC can essentially take on whatever role is necessary to “protect the revolution” and the Supreme Leader and now controls an empire of “revolutionary” economic, educational, cultural institutions and criminal endeavors not military in nature, and fully dedicated to its revolutionary mandate of “protecting” the Revolution and the advancement of global Islamic rule abroad. The IRGC’s mandate might therefore be best described as an institutionalized and largely autonomous terrorist entity, not analogous to the “armed forces” of another state in terms of its activities, structure, and ideology. It should therefore not merit any policy consideration from Canada, as a duly constituted armed force of another state entity, shielding it from a terrorist listing.
- The IRGC is unique insofar as it is defined by its lack of definitional and legal limitations, allowing it to be many things concurrently – thereby rendering it something other than just a branch of the armed forces. The IRGC has evolved to serve certain significant military purposes, but only as part of its role as the vanguard of an ideological Islamist movement to protect the Revolution whose declared allegiance transcends loyalty to Iran itself. It should therefore not be accorded the protections of an “armed force” of a nation-state whose national identity the IRGC overtly disavows, disparages, and rejects as a matter of theological principle. Canada therefore can and should list the Guard as a terrorist entity under Canadian law, affording it no consideration as a normative “armed force” of another “country. If the organization itself and the constitution mandating its existence clearly did not limit or define the IRGC as being a normative military entity, why should the international community give this malevolent entity the privileges of such a status?

6. Is Iran's Policy of Forced Conscription an Impediment to Listing the IRGC as a Terrorist Entity?

a. The Conscription Argument

The public debate on whether Canada should list the IRGC as a terrorist entity has focused on how a terror listing would impact former IRGC members living in Canada or attempting to come to Canada. Opponents to a terror designation argue that these individuals may have been forcibly if not randomly conscripted into the IRGC and are undeserving of any strictures that may result from such a listing.

b. Expert Research on IRGC Conscription

This conscription argument reflects a paucity in Western understanding of how induction into the IRGC truly works and what solutions under Canadian law might be available. Saeid Golkar⁵⁴³ of the Washington Institute for Near East Policy and Kasra Aarabi⁵⁴⁴ of the Tony Blair Institute for Global Change have both provided detailed breakdowns of the IRGC's recruitment and training mechanisms. Their research findings belie the blanket assumption that those recruited into the IRGC should prima facie be deemed victims of the Iranian regime and its policy of compulsory military service. Indeed, their research suggests that most IRGC recruits would be more accurately categorized as self-selected conscripts who were ideologically vetted by the regime.

c. The Purging of the IRGC – Creating a Pure Ideological Force

- In 1989, the regime started purging the IRGC of members suspected of insufficient loyalty to the tenets of Khomeinist ideology and to the infallibility of Iran's Supreme Leader. Then, beginning in 2001, the IRGC shifted to recruiting new personnel extensively from a paramilitary group called The Organization for Mobilization of the Oppressed –known as the Basij. The Basij is a volunteer force that serves and trains under the IRGC command structure, and is rightly feared by many Iranians. It is unsparingly brutal in enforcing regime edicts, attacking foreign embassies and crushing domestic unrest.
- Golkar and Aarabi estimate the actual number of Basij to be around five million,⁵⁴⁵ “though only about 100,000 to 200,000 serve as full-time, active duty, and paid personnel”.⁵⁴⁶ “The Basij has a presence in virtually every occupational sector in Iran.”⁵⁴⁷ “Some 50,000 branches of the Basij operate ... with a presence in mosques, government offices, factories, hospitals, schools, and universities.” The IRGC's Basij militia has also been a central accomplice in recruiting, training, and deploying child soldiers to fight in conflicts across the region. On October 16, 2018, the U.S. Department of the Treasury's Office of Foreign Assets Control (OFAC) enacted sanctions against the “vast network of businesses providing financial support to the Basij Resistance Force (Basij), “a paramilitary force subordinate to Iran's Islamic Revolutionary Guard Corps” for its malign activities including recruiting, training and deploying child soldiers “to fight in IRGC-fueled conflicts across the region”.⁵⁴⁸
- The IRGC's rigor in recruitment was upgraded again in 2010 when it further constricted its pool of recruits in pursuit of ideological purity in its ranks, preferring to draft active members of the Basij or those with exhaustively vetted ideological credentials. According to Golkar and Aarabi: “Since 2010 more than 70 per cent of draftees in the IRGC have been active members of the Basij.”

d. IRGC Indoctrination Since 1997 – Crafting a Radicalized Violent Terrorist Product

The radicalization of these recruits is then augmented by the IRGC's enhanced indoctrination system called "ideological-political-training" (IPT). This makes up roughly half of the recruits' mandatory training. Golkar argues that the IPT program consists of tens of thousands of "trainers" with oversight "to control the thoughts, words, and deeds of IRGC personnel" and their families. This IRGC indoctrination seeks to instill within its recruits a transnational terrorist ideology, with violence as a central tenet. National security affairs professor Afshon Ostovar writes in *Foreign Policy*,⁵⁴⁹ that the IRGC's loyalties "are neither to Iran nor bound by geography. The political entity that they serve is transnational. The same Quranic verses used by ISIS and al-Qaeda to give them religious legitimacy to wage jihad also appear in the IRGC's indoctrination materials. The IPT program has in fact borne fruit for the regime as "evidenced by the fact that of all the IRGC's generations, the third (2000-10) and fourth generations (2010-20) are among the most ideologically extreme." The inductees then go on to become some of the globe's most radicalized propagators of terrorism and the Islamic Revolution.

e. Since 2010 – 70% of Conscripts to the IRGC are "Self-Selected" and Radicalized

This research indicates that significant numbers of IRGC members, and certainly those who have served more than the 18–24-month period required for mandatory military service, should not be viewed as victims of forced conscription. They would be more accurately categorized as self-selected conscripts who likely had previously volunteered to join the Basij force or had volunteered to serve in the IRGC and were ideologically vetted by and thoroughly aligned with the most violent proclivities of the regime. As noted by above by Golkar and Aarabi:⁵⁵⁰ "since 2010 more than 70 percent of draftees in the IRGC have been active members of the Basij. In Iran's major cities, where demand for IRGC military services is higher than elsewhere, this has even reached 100 percent of draftees. Therefore, since 2010, we know that at least 70 percent of the IRGC's 50,000 conscripts are ideologically aligned to the Guard as they were already proactively affiliated via the Basij."

Golkar further explains that: "Since the new measures were implemented in 2010, the Guard has shrunk its pool of recruits to those with a conservative-ideological worldview. Valued attributes include having a parent in the IRGC, being the relative of a martyr or veteran (e.g., of Iraq or Syria), being a "devotee of the Islamic Revolution," and belonging to the Basij. ... Since 2010, moreover, recruitment to the IRGC often happens through shared nomination by members ... informed by an emphasis on ideological purity and fealty to the Islamic regime."

f. Policy Recommendations on Conscription

The IRGC is a terrorist entity of global reach with access to unmatched resources as a state-sanctioned global terrorist force. The gravity of the threat demands that Canada and Western countries fully employ their arsenal of legal weapons to deter, impair, and delegitimize this entity, as so many Iranian-Canadians and human rights activists have demanded. The argument for listing the IRGC in its entirety as a terrorist entity is in fact only strengthened by the realities of the IRGC's conscription and indoctrination processes. Most IRGC members in recent decades have been willing participants in the IRGC's mandate to protect Khomeini's Islamic Revolution by any means and to crush all opposition in its path. All IRGC members in this demographic are comparable to the radicalized ideological recruits of multiple other terrorist entities like ISIS, listed by Canada and other western countries.

Nevertheless, as we will explain below, Ottawa can ensure to the best of its abilities that an IRGC terror listing would not subject those who were genuinely forcibly conscripted and uninvolved in IRGC atrocities to travel impediments with respect to entering or leaving Canada.

Policy Recommendations:

a. Enhanced Diligence in Protecting Canadians from the IRGC

It is imperative that any former or current member of the IRGC seeking entry to or residing in Canada – whether volunteer or conscript – is vigorously scrutinized. Officials must determine that such individuals do not present a threat to Canada, to Canada’s Iranian diaspora, or to other communities currently targeted by the Iranian regime.

b. Evaluating IRGC Conscripts

- The 70 percent of draftees since 2010 from the ranks of the notorious Basij should not be accorded any consideration of exemption from a Canadian terror listing. In fact, membership in the Basij itself, which operates under the IRGC command structure, should be a factor in evaluating any right of entry to Canada, regardless of any other involvement with the IRGC. This research would indicate that the same should apply to IRGC members, including those forcibly conscripted, who have served more than the 18–24-month period required for mandatory military service, who should not be viewed as victims of forced conscription.
- The remaining 30 percent of conscripts, as noted by Golkar and Aarabi, “can be broken down into two categories. The first are university graduates with a master’s or Ph.D. Due to their postgraduate degrees and subject-matter specialties, these draftees complete their two-year service by applying for desk jobs through directives (*amriyeh*) from different ministries and agencies. Each draftee has a personal choice on where to apply including the health ministry, the industry ministry, and the defense ministry and the IRGC’s affiliated organizations (cultural, political, economic).

Those who continue to serve their *amriyeh* in the IRGC will have made the proactive decision to work for the IRGC’s branches during their two years of conscription in spite of its reputation. It is safe to conclude that these individuals may have ideological convictions that align with the IRGC and its overarching objectives. These individuals will have an official letter from the Guard and will have pay slips for having been on the IRGC’s payroll during their two years of conscription.

Finally, in some unprivileged and poor areas, due to the number of Basij members being insufficient, the IRGC also accepts non-Basij soldiers. These draftees will have no IRGC documentation, and almost all in this group have only a high school diploma or below. “While filtering and determining this category would require a special degree of scrutiny, it can be achieved on a case-by-case basis.”

c. Utilizing Section 42.1 of the Immigration and Refugee Protection Act to Ensure Fairness

Ottawa if it has the will to do so, it can ensure to the best of its abilities that an IRGC terror listing will not subject those forcibly conscripted and uninvolved in IRGC atrocities to travel impediments with respect to entering or leaving Canada. Notably, section 42.1 of the *Immigration and Refugee Protection Act* already contains a mechanism for overriding a finding of inadmissibility to Canada for foreign nationals and permanent residents, allowing the Minister of Citizenship and Immigration to declare someone admissible despite membership in a terrorist organization if justified on national security and public safety grounds. Forced conscription to the IRGC, if supported by the evidence and untainted by complicity in any of the IRGC’s myriad offences, should fit within these parameters and provide a solution for those forcibly conscripted who may be unfairly impacted by a terror listing, while concomitantly addressing a key national security concern for Canada. If additional carve-outs in the law are necessary, with explicit exceptions made for this category of innocent conscripts, we are confident they can be quickly developed.

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7. If Canada has already imposed various other sanctions on the IRGC why is it also necessary to designate the IRGC as a terrorist entity?

- **Canadian Sanctions on the IRGC Prior to the Listing**

While Ottawa had been willing to impose other sanctions on the IRGC, prior to the listing on June 19, 2023, Canada had demurred from proceeding with a terror designation. Most recently on April 25, 2024, Canada announced it was “imposing additional sanctions against Iran under the *Special Economic Measures (Iran) Regulations* With these new measures, Canada has sanctioned 200 Iranian individuals and 250 Iranian entities”.⁵⁵¹ The new sanctions were in response to the regime's “broad first-ever direct attack on Israel Iran's Islamic Revolutionary Guard Corps (IRGC) took responsibility for launching drones and missiles while Iranian proxies, including the Houthis, Hezbollah and Iran-linked militias in Iraq, also launched strikes in a limited but highly coordinated manner.”⁵⁵²

The government's news release also referenced Canada's previous sanctions initiative against the IRGC announced in October 2022, “listing members of the Iranian regime, including the IRGC and its top leaders – more than 10,000 senior officials – as inadmissible to Canada because of their engagement in terrorism and in systematic and gross human rights violations by enacting a designation under the *Immigration and Refugee Protection Act* (IRPA), adopting new sanctions against members of the IRGC and the Iranian regime, as well as those associated with them”⁵⁵³

- **The Limitations of Existing Sanctions**

The list of Canada's current SEMA/*Magnitsky Act* sanctions against Iran⁵⁵⁴ in essence prohibits the export to Iran of a range of products that could be used for nuclear activity as per the JCPOA, make it illegal for any Canadian engage in a transaction or provide financial services to a list of 234 entities and 196 individuals, and prevent those individuals from immigrating to or even entering Canada (other than for diplomatic purposes). Notably, entities and individuals had to be specifically listed by Ottawa via regulation in order for these measures to apply, and it is unclear how often this list is updated – by way of example, a grand total of two individuals have been added so far in 2024. In addition, only the entities themselves are affected by the listing, and not that entity's members, directors, officers, etc., unless listed separately as individuals. Section 8 of SEMA and s.11 of the *Magnitsky Act* both notionally provide that the maximum penalty for a violation is five years in prison, but there appear to have been very few prosecutions and seemingly no prison sentences ever handed down.

Prosecutions appear to be difficult to implement, with the 2020 acquittal of a pro-Assad Syrian who sent money to a regime-run travel agency being a typical case.⁵⁵⁵

- **The Legal Scope of the IRGC Terror Designation**

By contrast, once an entity is designated as a proscribed terrorist entity under s. 83.05 of the *Criminal Code*, any and all of its members are automatically barred from entering Canada, and providing any financial services, going abroad to join or assist the entity, facilitating its activities, etc. all become terrorist offences, some of which carry significant prison sentences (up to 25 years) and which have resulted in some actual prosecutions and convictions throughout the years. More importantly, these sanctions apply automatically to each of its members, without any need for Ottawa to conduct time-consuming research, update a regulation, account for individuals/entities using false names and aliases, etc. Of course, an organizational level terrorism designation also carries a sort of moral stain that does not attach to more “targeted” SEMA/*Magnitsky Act* sanctions.

(Overall, we would argue that the SEMA/*Magnitsky Act* framework is better suited and more specifically calibrated to situations where a country has certain officials or corporations that are controlled by bad actors and ought to be sanctioned, e.g. Turkey, as opposed to cases where both the government and the “deep state” are collectively committed to a terrorist ethos as a core component of its identity and domestic and foreign policies.

When listed as a State Supporter of Terrorism under Canadian law, the law has recognized the unique anomalous nature of this state beyond its autocratic characteristics as thoroughly saturated in its state structures and functions with extremists and terror supporters, who like the IRI control virtually the entire state apparatus and economy and exploit it for nefarious ends. While no set of sanctions is a silver bullet against the crimes it targets the integrity of Canadian policy like any other area of law, will only benefit and be maximally effective when applying the appropriate measures correctly to the violators and violations under consideration. In our opinion the current Canadian sanctions against the IRGC fall far short in this regard.

- **The Import of a Terrorist Designation for the IRGC**

Terrorism is Different

UN Resolution 2199 adopted February 12, 2015, states simply that: “Terrorism in all forms and manifestations constitutes one of the most serious threats to international peace and security [...]”,⁵⁵⁶ a position also echoed by NATO which described terrorism as “the most direct asymmetric threat to the security of the citizens of NATO countries, and to international stability and prosperity.”⁵⁵⁷

Terrorism has been recognized therefore as not simply a more pernicious form of organized crime or other violent anti-societal behaviour. As noted by the Canadian courts in *R. v. Reyat*, 2011 “the court defines terrorism as “an existential threat to Canadian society in a way that murder, assault and other crimes are not ... terrorists reject and challenge the very foundations of Canadian society”.⁵⁵⁸

The courts’ evaluation of terrorism as a unique offense is entirely correct. Whereas the interest of most criminals is primarily personal gain of some sort and not the ideologically legitimized if not mandated imperative of destroying a society or a group/community/nation as a whole, the objective of terrorism is to undermine – if not destroy – the society, country or communities being targeted. In its more recent configurations it is often accompanied by a willingness to destroy oneself, one’s family and one’s own community to do so. Subsequently, while criminals will often avoid large-scale massacres of uninvolved persons, children, officials, and other high-

profile targets that might invite unwanted scrutiny considered “bad for business”, the primary purpose of terrorist activity is to litter the public sphere both actually and virtually, with as many victims as possible. For contemporary terrorism slaughter is both an aim in its own right as well as an act of “propaganda by deed”. Terrorist atrocities including the most heinous of acts of the type committed by ISIS, al-Qaeda, or most recently by Hamas against the civilians of southern Israel, are not only expressions of an unabashedly declared ideological ethic but a messaging strategy that is essential to achieving a terrorist objective targeting a variety of audiences both friends and foes, for multiple short and long-term purposes.

Terrorism also differs from other criminal threats in its disproportionate capacities to generate global conflict; to propagate global criminal enterprises; to inflict damage at a level once reserved only for sovereign entities; and in its pursuit of WMD. Acquiring WMD is a stated terrorist imperative for many terrorist entities, not as a defensive measure or tactical option, but as a preferred if not ideal weapon for achieving clearly articulated ideological goals.⁵⁵⁹ The immediacy and magnitude of the threat has been outlined by leading experts on nuclear proliferation some of whom believe that a terrorist attack with unconventional weaponry may be all but inevitable.⁵⁶⁰ “In 2004 the Report of the Secretary-General’s High-Level Panel noted that “modern terrorism is employed in the pursuit of extremist ideologies Terrorist organizations motivated by such ideologies characteristically aim not at a clearly defined political demand, but often at the entire state-based structure of human society. This leads to the other dynamic identified by the High-Level Panel’s Report, namely that the goal of terrorists to cause mass casualties creates unprecedented dangers.”⁵⁶¹ Terrorism as such, is a tactical and operational delivery system particularly well suited and attractive to those terrorist entities like the IRGC adhering to genocidal and or apocalyptic ideologies.⁵⁶²

Terrorism Listings Require More Comprehensive Than Many Other Sanctions Formats

International law and domestic legal systems across the globe have therefore recognized terrorism as a special category of crime and have created specialized resolutions, treaties, policy initiatives and statutes that have grown more expansive and comprehensive to contend with the phenomenon of terrorism and its predations. Our legal frameworks continue to evolve in addressing the unique dynamics of terrorism as an enterprise, to overcome the difficulties faced by democratic societies related to the investigation, deterrence and prosecution of such crimes. As noted in a UBC Law Review Society article on terrorism sentencing:

... Prior to 2001, a “terrorism offence” did not exist in Canada, at least not according to the *Criminal Code*. It was not until the 9/11 terrorist attack on the World Trade Centers that Canada passed in a matter of months, the Anti-Terrorism Act (“ATA”). The ground-breaking ATA included the very first of the terrorism offences that are now found in Part 11.1 of the *Criminal Code*. It also defined the terms relied upon in the *Criminal Code*, including such elusive phrases as “terrorism offence”, “terrorist activity”, and “terrorist group”, **and even went so far as to provide a process for listing a number of such terrorist groups.**’ The ATA also introduced a smaller amendment to section 718.2 of the *Criminal Code*, one that is often overlooked and has received no sustained interrogation, yet has come to be of great import in determining the sentences for convicted terrorists in Canada..⁵⁶³

Canada’s listing mechanism for designating banned terrorist entities was one new legal tool in Canada’s juridical arsenal against terrorism as was the passage of the *Justice for Victims of Terrorism Act* (JVTA), a ground-breaking *Act* which allows victims of terrorism to sue state and nonstate sponsors of terrorism, in Canadian courts. Under the JVTA Iran and Syria have been listed as State Supporters of Terrorism, which has enabled terror victims to sue these specific countries in Canadian courts for terrorism-related actions and sponsorship.

The new policies aimed at terrorism, both at the national and international levels, have incrementally defined terrorist offences more broadly so as “to target the entire chain of responsibility”⁵⁶⁴ and to hold accountable “also those who act indirectly”.⁵⁶⁵ “The emergence of a new kind of terrorism has been an essential factor in reshaping the legal and policy means and methods to counter international terrorism, which in recent years have increased in number and sophistication. Conventions and protocols which address specific acts of terrorism have been coupled with new instruments and measures that target terrorist networks in a more general and comprehensive manner. In terms of responsibility – both individual and state responsibility – there has been a shift of focus from specific terrorist acts to terrorist activities understood more broadly, and to activities supporting and sustaining terrorism”⁵⁶⁶

Canadian courts have endorsed this approach to terrorism as a “special” category of crime. In multiple decisions the courts have found Canada’s listing of State Supporters of Terrorism and the legal mechanisms of the JVTA to be effective and appropriate, in line with Canadian legal values, and reflective of the special gravity of terrorist offences and the danger they pose to Canada and Western societies.⁵⁶⁷ Canadian courts have “acknowledged that terrorism differs from other threats” and that terrorism should be “distinguish[ed] ... from other crimes” in terms of its gravity and thus terrorism is placed ‘in a category of its own’.⁵⁶⁸ The “special danger”⁵⁶⁹ it poses, recognized as such in multiple UN Resolutions, have been recognized by the Canadian courts which have determined that terrorist offences are “abnormal crimes”⁵⁷⁰ – and that terrorism as a phenomenon is a “crime unto itself” that “has no equal....”⁵⁷¹ [N]ot limited to, the senseless destruction of people and property ... [i]t attacks our very way of life and seeks to destroy the fundamental values to which we ascribe – values that form the essence of our constitutional democracy.”⁵⁷²

Our legal system has addressed this unique threat by enacting provisions that do not obfuscate its special nature, calling it by its name with specialized provisions, as a prerequisite to achieving the intentions for which these laws were created.

Within the realm of the “special” crime of terrorism, the IRGC is perhaps the globe’s preeminent terrorist actor in that realm. As demonstrated in this paper, the immense global scope and gravity of the threat posed by its terrorist exploits and ideology to the international community and to Canadians, is different in kind and degree from most if not all other terrorist entities currently listed by Canada.

Ottawa was therefore correct in applying the expansive and more comprehensive framework of a terror listing to the IRGC, as a mechanism to blanket and thereby undermine the entirety of its terrorist enterprise, as a necessary tool to impede and interdict the complexities of the IRGC terrorist infrastructure. This terrorism listing is crafted in line with international shifts in legal approaches to the phenomenon of terrorism described above. And given the sprawling global and unprecedented reach of the IRGC’s terrorist networks into multiple continents, industries, and transnational organized crime as explicated above, the partial, limited piecemeal sanctions currently employed by Canada against the IRGC are neither appropriate nor effective in impairing or obstructing IRGC’s capacities in Canada or elsewhere, nor in providing maximal deterrence for others, in Canada or elsewhere, from engaging in illicit dealings with or enabling this entity.

- **Listing the IRGC: Potential Legal Impact Canadian on Terror Victims and other Antiterrorism Efforts**

SEMA sanctions against the IRGC also do not provide Canadian victims of IRGC terrorism with the same capacity to seek justice from perpetrators as those who have suffered harm from listed terror entities, as currently provided for under the *Justice for Victims of Terrorism Act* (JVTA). The JVTA has been carefully calibrated for the purpose making it easier for terror victims, which the JVTA recognizes as a unique class of victim requiring

specialized provisions, to seek justice and accountability from terrorists and their sponsors⁵⁷³ – often in cases where criminal prosecutions are not feasible.

Furthermore, other areas of Canada’s anti-terrorism provisions cannot readily be activated without a terror designation. For instance, due to the severity of terrorism as a category of crime it is illegal to take any number of actions to incite terrorism or to promote listed ed terror entities. and in January 2024, Toronto police for the first time, arrested a man and charged him with public incitement of hatred for carrying the flag of a listed terror organization.⁵⁷⁴ The same could not necessarily be said about waiving a supporting symbol of an entity that could be considered promoting or incentivizing involvement with many of those currently listed under the SEMA sanctions. A terror designation therefore carries significant weight in public and foreign policy and is important to apply when that designation has been earned.

- **Failure to Sanction the IRGC as Terrorist Entity is a Clear and Detrimental Policy Statement**

As Prime Minister Trudeau has constantly reiterated “Canada is a rule-of-law country”,⁵⁷⁵ and indeed Canada like other democracies places enormous value on the accurate categorization of the violations targeted by either judicial or governmental sanction. Both our legal and sanctions systems, while obviously different from each other in a variety of ways, seek to redress wrongs and establish acceptable behavioural norms and deterrence in the domestic and international arenas, through the careful classification of violations and the attendant penalties related to any given category.

In the case of criminal law, these classifications “portrays a community’s values and ... the sentence imposed is a means to communicate and instill these communal values as articulated by the *Criminal Code*,”⁵⁷⁶ and in fact the law in general reflects the “value conception of a society”.⁵⁷⁷ As explained in the *Criminal Code* the purpose of sentencing in imposing just sanctions include several objectives including denouncing unlawful conduct; deterring the offender and other persons from committing offences ... and acknowledgment of the harm done to victims or to the community.”⁵⁷⁸ Government imposed sanctions have similar purposes: “Sanctions allow governments to respond to international behaviour that is determined to be adverse to their national interests, including violations of international law and norms. The overall intent is to affect or constrain the target’s behaviour or to communicate the unacceptability of that behaviour They generally can be understood as aiming to achieve one or more of the following outcomes: [including] ... restricting a target’s ability to carry out an activity (constraint); and expressing serious disapproval of a target’s behaviour (signaling)”.⁵⁷⁹

For either system to be effective and just, the proper and accurate categorization of the violation is paramount.⁵⁸⁰ Whether a given crime is for example categorized as “aggravated assault” or “rape”, whether we sanction violators for “genocide”, “mass murder”, or “a grave breach of international peace” and regardless of whether the penalties are the same, the classification itself is critical to achieving the objectives and broader intentions of these systems. And as we have explained above, our legal system has recognized terrorism as a distinct typology of criminal behaviour that should not be subsumed other related categories of mass violence or hateful criminal acts. Classifying the violation properly is essential and miscategorizing violations or crimes therefore results in undermining some of the basic objectives and functions of these systems.

The West’s conspicuous adoption over the last 45 years of a position of “any sanction but a terrorism listing” for the IRGC, is therefore in fact making a significant foreign policy statement in its own right that tacitly declares that the IRGC as an entity, is not a terrorist organization although its behaviours and leaders have been described

as such by Western leaders, and that the West is unwilling to taint this entity with the severity of penalties, illegitimacy, and ignominy inherent in such a designation.

- **Other Canadian Sanctions Were Insufficient**

The October 2022 sanctions imposed by Canada on 10,000 IRGC members under IRPA referred to above, were premised, as stated by then Deputy Prime Minister Chrystia Freeland on Iran being a “state sponsor of terror The IRGC leadership are terrorists, the IRGC is a terrorist organization”. She further stated that “Today, by listing the IRGC under IRPA and indeed by listing the broader leadership of the Iranian regime, we are formally recognizing that fact and acting accordingly.”⁵⁸¹ The 10,000 IRGC members sanctioned under IRPA by Ottawa appeared to be impressively large number of targets, but the immigration sanction itself did not effectively convey as intended “formally recognizing the fact” that the IRGC is a “terrorist organization” as demonstrated by the fact that Ottawa had opted for a more limited immigration sanction and not a terror listing. While it is undoubtedly good policy to keep 10,000 terrorists out of Canada, the glaring discrepancy between an immigration sanction and the terrorism target of that sanction considered the leading “franchise builder” of terrorism, woefully miscast this very special perpetrator of this most special crime as an immigration problem.

Concomitantly, this immigration sanction served to misconstrue the large grouping of sanctioned IRGC members as if they are individual rogue actors somehow detached from the single integrated command of the IRGC under which they operate⁵⁸² - which is somehow not accountable as an entity for its cadres who are “just following” its orders. This proposition conveyed the wrong message, and didn’t provide the accountability demanded by Canadians and the Iranian protesters themselves. These 10,000 miscreants are not simply individually maleficent but part and parcel of the inner circuitry of the IRGC, *which in its entirety* is a multi-billion-dollar terrorist/criminal/economic empire whose nuclear appetites and genocidal inclinations pose a threat to entire swaths of humanity and not only to the extraordinarily brave citizens of Iran who daily stare down the IRGC on the streets of the Islamic Republic. These sanctions also overtly spare the exceedingly violent IRGC-affiliated and controlled subordinates of the 10,000 individuals, numbering in the hundreds of thousands, who in practice execute the criminal directives of these 10,000 people. These subordinates or proxies are no less dangerous or violent than their sanctioned superiors, and yet, under the past sanctions regime exempt them and perhaps even render them suitable for entering Canada.

Western reluctance to formally designate the IRGC as a terrorist entity is in fact a form of public declaration by omission, that the IRGC in fact is not really a terrorist entity, which will not go unnoticed by the regime. It will be viewed by Tehran as just another set of Western half-measures, that in the regime’s calculus, while inconvenient or damaging, ultimately are a vindication of the regime’s intransigence and feed the regime’s carefully crafted narratives both for domestic and foreign consumption – that the IRGC’s terrorist engagements are legitimate uses of military force, while reinforcing the IRGC’s doctrine of plausible deniability in its role as the architect of its global terrorist empire. The regime knows that terrorist designations undermine its carefully constructed policies of creating a criminal/terrorist empire on multiple continents with the willful indulgence of the international community, that has remained just distant and uninvolved enough in its public profile,⁵⁸³ to maintain the all but transparent façade of a lack of culpability for terrorism, and thereby avoiding the most severe of sanctions or retaliation⁵⁸⁴ despite the overt support and direct involvement of the IRGC with these entities.

“Anything but a terror listing for the IRGC” will also be perceived as essentially an endorsement of the regime presumption built on years of Western acquiescence, that Canada and other Western countries will only take

limited actions against the IRGC that fall short of the required steps to truly deprive the Khomeinist regime of the oxygen it needs to survive. Given Iran's astounding international successes over the years securing billions in sanctions relief while exporting destruction across the region and generating instability across the globe through its proxies like Hamas, that delusion must be shattered - and Canada has contributed to its dissolution by formally delegitimizing the IRGC with a terror listing.

A terror designation therefore is important tool not only for contending with terrorism itself but for crafting domestic and foreign policies that will deter others from enabling or supporting terrorist activity. Violating the strictures of a terror sanction, casts the individual or entity in question as a supporter or an enabler of terrorism, which is different in degree and in kind, both legally and in the public perception, from enabling someone to violate a SEMA sanction or to promote or enable an entity listed by SEMA.

- **Listing the IRGC Undermines the Regime's Global Propaganda Machine**

Over these last years, Canada and other Western countries have been besieged by a growing cacophony of requests from Iranian protesters, dissidents and human rights advocates both in Iran and abroad, including the family members of the victims of the IRGC's shutdown of PS752, to designate the IRGC in its entirety as a terrorist entity. While there are many compelling reasons to do so, this demand by Iranian dissidents is often mistakenly understood simply as a request for a well-deserved punitive response to the egregious and uncontested crimes committed by the IRGC and the regime it serves. This perception fails to appreciate what these dissidents and their representatives understand about some of the inner dynamics and vulnerabilities of the regime, often missed in Western analysis, and why the listing has featured so prominently and unrelentingly in their advocacy.

Iranian dissidents and protesters understand all too well, that listing the IRGC will do more than obstruct, impair, deter, and punish the IRGC's global terrorist infrastructure. As deeply scarred warriors of Iran's propaganda war against dissent, they are well positioned to know that a listing would also serve as a targeted and essential weapon against what the regime considers perhaps the most essential tool in its ideological and terrorist toolbox – its multi-billion soft power and information warfare campaign both within Iran and across the globe. The regime, aware of its vulnerability to the scathing critiques leveled at its excesses by its own citizens and the international community, sees it as an existential threat to its perpetuity and to fulfilling its primary objective of exporting the Revolution, and remains obsessively fearful of internal dissent and foreign scrutiny and agitation as a prelude to a popular revolution. Tehran's information warfare campaign therefore is largely aimed at defending and promoting the Revolution and its export, by obfuscating and justifying the abuses and failures of the regime in fulfilling its self-declared role as the selfless champion of the Muslim *ummah*, the world's Shia population, the Iranian nation, and the “oppressed” of the globe. This prioritization of information warfare has risen to the very top of the Supreme Leader's agenda, the import of which needs to be elucidated in order to fully appreciate what Canada and other countries can contribute through listing the IRGC to enabling Iranian dissent and to undermining the regime's influence and radicalization efforts, both within and beyond the borders of the Iran.

We will provide a short summary of some expert insight into Iran's unique perspective on information warfare that will shed light on the import of Canada and other Western countries designating the IRGC as a terrorist entity.

b. Iran's Propaganda Apparatus: “Integral to Survival.”

In the thinking of the Iranian regime, information warfare represents an existential imperative that is necessary for its survival. The Atlantic Council report provides a concise overview of the unique thinking underpinning the Iranian regime's vast multi-billion-dollar propaganda efforts across the globe and the methodologies it employs, that differ

from those of other bad actors like Russia or China, a full analysis of which is beyond the scope of this paper. Iran's Supreme Leader Ayatollah Khamenei "has emphasized the importance of digital influence operations to Iran's survival"⁵⁸⁵ and has been unambiguous about the primacy of these efforts as a regime priority: "In 2009, Ayatollah Khamenei stated that 'content promotion' was 'the most effective international **weapon** against foreign adversaries'."⁵⁸⁶ Khamenei has emphasized the importance of digital influence operations to Iran's **survival**. ... Khamenei warned an assembled group of IRGC commanders [in 2015] that 'economic and security infiltration' was less a threat than 'intellectual, cultural, and political infiltration.' The control and manipulation of information was inextricably linked to national security."⁵⁸⁷ As noted in the Atlantic Council report, should the information conflict be lost, many Iranian officials believe the collapse of the state will soon follow."⁵⁸⁸ And is considered "integral to the state's survival".⁵⁸⁹

Similarly, a report by the Middle East Institute, *Revolutionary Narratives: The Islamic Republic's Greatest Strength* notes the centrality of the "narrative" promulgated by the regime is also stressed as essential for regime survival:⁵⁹⁰"Sticks alone are unsustainable ... and so the regime pairs them with several well-placed carrots. These come in the form of attractive promises that perpetuate well-woven narratives. Narratives are extremely powerful political tools that can garner unwavering support from a political base. What makes them so powerful is their tendency to work regardless of whether the story they tell is true, or whether the promises made are kept. ... Within Iran, the opposition sees through this hollow narrative, but many Iranians do believe it to some degree."⁵⁹¹"[The Iranian President] ... knows that he must continue perpetuating this narrative if he wants the regime to survive ..."

c. Iran's Narrative: Selling "Iran's moral authority"

Information warfare, as noted, is a key tool used by Iran to achieve its objectives, including "expanding its base of influence in the Middle East; *undermining the internal resilience of its adversaries*, including the Gulf States; strengthening the impact of its military efforts (for example, by exaggerating their successes); and improving its own image and that of its regional policies. *In addition, Iran's information warfare supports and supplements its ability to export its ideological, religious, and cultural principles, including combating the West and supporting the "resistance."*⁵⁹¹In this respect the emphasis of Iran's information warfare efforts on justification and persuasion to key audiences⁵⁹² in contradistinction to other disinformation efforts by countries like Russia, deserves to be noted in any Western deliberation on countering Iran's vast global information warfare network. The Atlantic Council's report explains:⁵⁹³

If the principal intent of Russia's digital influence efforts is to distract and dismay, Iran's goal is most often to persuade. ... Where the Russian approach is essentially nihilistic, intended to erode the very nature of "truth," **Iran advances a distorted truth that exaggerates Iran's moral authority, while minimizing Iran's repression of its citizens and the steep human cost of its own imperial adventures in the wider Middle East.**" As an extension of Iran's public diplomacy it seeks to "tell Iran's story" to many different audiences: in Africa, in Southeast Asia, in Europe, in North America, Latin America and the Middle East and Indonesia, home to the largest Muslim population in the world and Nigeria with the largest Muslim population in Africa, and which includes a "convince target audiences of the justness of its worldview and interests.

d. Designating the IRGC: Undermining Iran's Moral Authority

As self-declared by the Ayatollah Ali Khamenei quoted above, the Islamic Revolution's ongoing war against the Iranian people, Muslim detractors, the West, and as particularly evident in its obsessive loathing of the Jewish people – this war is very much a war of narratives. As the globe's most egregious state sponsor of terrorism, the regime astutely understands the symbiotic relationship between terrorism and the informational war that must accompany it

in order for the regime to obscure its actions and motives; avoid consequence; and critically to retain its legitimacy in the eyes of Iranian citizens and within the key constituencies the regime seeks to engage across the globe in exporting that revolution. This war of narratives is understood no less acutely by the Iranian protesters and dissidents who need Western assistance in undermining the regime's narrational weaponry – which Western experts and officials also concur requires an aggressive counternarrative campaign to contend with regime's multi-billion propaganda industry.⁵⁹⁴ Thomas Halvorsen of the Middle East Institute put it as follows:

The social contract in Iran will not be rewritten until the bubbles on which these narratives rest are burst. The regime has proven for many years that it can continue to perpetuate these narratives regardless of reality. The question we must ask ourselves, therefore, is how can one combat false narratives? It requires combatting not just action, but also *rhetoric*. The Iranian people, and those who support them around the world, must make a concerted effort to question every claim made by the regime, and hold it accountable for the promises it makes, by constantly measuring them up against reality. Only then will the regime be forced to alter its behavior, within Iran, across the region, and around the world.⁵⁹⁵

Given that the IRGC is the backbone of this regime's malevolent activity both in Iran and across the globe, and the very embodiment of the Islamic Revolution's transnational terrorist ethos, it should come as no surprise that the regime has every interest, and will go to extraordinary and brutal lengths, in protecting the credibility of the IRGC as a legitimate armed force of Iran protecting Islam, Muslims and the "oppressed" – rather than the cruelest of oppressors of their fellow Muslims and the most ruthless of terrorists. Iran's dissidents understand this as well. So while Canada and other countries are not being asked to engage in actual warfare against the IRGC or to risk their lives in confrontations with the IRGC on the streets of Tehran, Canada and its allies can provide a valuable contribution to this effort by recategorizing the IRGC both legally and reputationally for what is – the world's most prolific terrorist entity.

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- ³³ <https://www.washingtoninstitute.org/policy-analysis/irans-military-establishment-doubles-down-revolution#:~:text=According%20to%20Articles%203%2C%20152,principal%20objective%20as%20the%20IRGC.>
- ³⁴ <https://www.institute.global/insights/geopolitics-and-security/beyond-borders-expansionist-ideology-irans-islamic-revolutionary-guard-corps>
- ³⁵ <https://institute.global/policy/fundamentals-irans-islamic-revolution>; <https://www.institute.global/insights/geopolitics-and-security/beyond-borders-expansionist-ideology-irans-islamic-revolutionary-guard-corps>; <https://www.runi.ac.il/media/by3dfcrx/bariraniapolicy2009.pdf>; <https://www.runi.ac.il/media/by3dfcrx/bariraniapolicy2009.pdf>
- ³⁶ [Laurent Murawiec, *The Mind of Jihad*, New York, Cambridge University Press, August 11, 2008, P. 43-44](#)
- ³⁷ Ann Elisabeth Mayer, "War and Peace in the Islamic Tradition and International Law," in *Just War and Jihad: Historical and Theoretical Perspectives on War and Peace in Western and Islamic Traditions*, eds. John Kelsay and James Turner Johnson, New York: Greenwood Press, P. 206: "Our war is one of ideology and does not recognize borders or geography. We must ensure the vast mobilization of the soldiers of Islam around the world in our ideological war...", quoted in *Denial and Jeopardy: Detering Iranian Use of NBC Weapons*, Chapter 3, by Paula A. Desutter, University Press of the Pacific, 4.1.2002
- ³⁸ <https://farsi.rouhollah.ir/library/sahifeh-imam-khomeini/vol/12/page/148>

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- ³⁹ <https://merip.org/1980/06/khomeini-we-shall-confront-the-world-with-our-ideology/>
- ⁴⁰ <http://www.thetower.org/article/meet-the-proxies-how-iran-spreads-its-empire-through-terrorist-militias/>
- ⁴¹ Quoted in <https://www.theatlantic.com/ideas/archive/2024/01/iran-problem/677282/>
- ⁴² <https://institute.global/policy/fundamentals-irans-islamic-revolution>
- ⁴³ <https://www.hoover.org/research/soft-power-iranian-regime>; <https://www.telegraph.co.uk/news/2024/07/06/theres-no-such-thing-as-a-moderate-iranian-president/>; <https://www.jstor.org/stable/24590477>; <https://www.fdd.org/analysis/2007/03/19/the-myth-of-moderate-mullahs/>; <https://www.fdd.org/analysis/2014/02/03/irans-moderate-icon-unmasked/>; <https://www.institute.global/insights/geopolitics-and-security/ideology-and-irans-revolution-how-1979-changed-world>
- ⁴⁴ <https://institute.global/policy/fundamentals-irans-islamic-revolution>
- ⁴⁵ <https://www.institute.global/insights/geopolitics-and-security/beyond-borders-expansionist-ideology-irans-islamic-revolutionary-guard-corps>
- ⁴⁶ <https://foreignpolicy.com/2011/09/30/slippery-when-read/>
- ⁴⁷ <https://smallwarsjournal.com/jrn/art/iran-and-victimization>
- ⁴⁸ <https://jcpa.org/article/irans-cognitive-war-is-more-dangerous-than-missiles-and-killer-drones/>
- ⁴⁹ <https://www.institute.global/insights/geopolitics-and-security/beyond-borders-expansionist-ideology-irans-islamic-revolutionary-guard-corps>
- ⁵⁰ <https://www.institute.global/insights/geopolitics-and-security/beyond-borders-expansionist-ideology-irans-islamic-revolutionary-guard-corps>; <https://www.institute.global/insights/geopolitics-and-security/what-velayat-e-faqih>
- ⁵¹ <https://www.institute.global/insights/geopolitics-and-security/what-velayat-e-faqih>
- ⁵² <https://www.institute.global/insights/geopolitics-and-security/what-velayat-e-faqih>
- ⁵³ <https://www.institute.global/insights/geopolitics-and-security/what-velayat-e-faqih>; <https://www.hudson.org/national-security-defense/the-iranian-clergy-s-silence->; <https://www.hudson.org/national-security-defense/the-return-of-political-mahdism->
- ⁵⁴ <https://www.institute.global/insights/geopolitics-and-security/what-velayat-e-faqih>; Eric Hooglund and William Royce, *The Shi'i Clergy of Iran and the Conception of an Islamic State, State, Culture, and Society*, Vol. 1, No. 3 (Spring, 1985), P. 102-117
Published By: Springer Nature
- ⁵⁵ A few quotes from leading clerics quoted in Amir Taheri, *The Persian Night, Iran Under the Khomeinist Revolution*, New York and London, Encounter Books, October 19, 2012, Chapter 4, *The Triple Oxymoron* :
Ayatollah Hassan Sane'i: The Islamic Republic is "as removed from Islam as the moon from the earth."; Ayatollah Mahmoud Tabatabai-Qomi: The Islamic Republic is "a total and systematic betrayal of Islam. No one should call this regime Islamic"; Ayatollah Kazemeini Borujerdi: The regime "is a conspiracy against God and believers"; Ayatollah Mahdo Rouhani: Khomeinism is "neither Islamic nor Shiite, but despotic"
Hojat al-Islam Kamaledin Ganjeh'i: "Khomeinism is a creation of Taghut" ("The Rebel" – an Islamic designation for Satan).; Hussein Mussavi Khomeini (Ayatollah Khomeini's grandson and a mid ranking cleric): The IRI "has no right to be described as Islamic"

⁵⁶ <https://www.mei.edu/publications/transnational-shiite-clergys-challenge-islamic-republic>;
<https://www.washingtonpost.com/archive/politics/1997/12/23/iranian-cleric-disputes-ayatollahs-right-to-rule/d4e2f279-6886-4349-959d-90a518c065ef/>; <https://www.nytimes.com/2010/08/05/opinion/05iht-edabdo.html>;
<https://www.cia.gov/readingroom/docs/khomeinism%20%20the%20impact%20of%5B15484915%5D.pdf>;
<https://www.oasiscenter.eu/en/iran-critics-guardianship-jurisconsult>;
<https://pompeo.org/the-ayatollahs-and-the-republic-the-religious-establishment-in-iran-and-its-interaction-with-the-islamic-republic>; <https://academic.oup.com/book/25914/chapter-abstract/193648155?redirectedFrom=fulltext>;
<https://www.hudson.org/national-security-defense/the-iranian-clergy-s-silence>-
see fn. 55

⁵⁷ <https://www.institute.global/insights/geopolitics-and-security/what-velayat-e-faqih>

⁵⁸ <https://www.institute.global/insights/geopolitics-and-security/fundamentals-irans-islamic-revolution> : The 1989 amendments to Iran's constitution bolstered clerical guardianship of the state by making the supreme leader's authority and power "absolute".

⁵⁹ Ahmad Azari-Qomi, a senior conservative cleric quoted in *Ressalat*, Tehran, 15 August 1988, quoted in *The Pillars of the Mullahs' Rule*. On Khomeini's instructions, Azari-Qomi defined the theoretical basis of such absolute rule in a series of newspaper editorials, https://books.google.co.il/books?redir_esc=y&id=8c_DAAAIAAJ&focus=searchwithinvolume&q=qomi

⁶⁰ Taheri 228; also see *The Pillars of the Mullahs' Rule*, P.55: "[i]n January 1988, the incumbent president and future *vali-e-faqih*, Ali Khamenei, said in a Friday prayer sermon that "governmental authority is contained within the bounds of divine edicts," Khomeini lambasted his protégé in an open letter: . . . Such an interpretation of my words - that the government's authority is limited by divine edicts - totally contradicts my statements. If the government's authority were bound by secondary commandments, I would have to say that the divine rule and absolute authority conferred upon the Prophet would be devoid of meaning and content. . . . I should point out that governing is one dimension of the absolute authority of the Prophet's *velayat-e-faqih*. It is one of Islam's primary decrees, and takes precedence over all secondary commandments, even prayer, fasting, and the hajj. . . . The *vali-e-faqih* is empowered to unilaterally abrogate the religious commitments he has undertaken with the people should he find them contrary to the interests of the nation and Islam. He can ban any religious or non-religious matter contrary to the interests of Islam. . . . The statements made, or being made, derive from a lack of knowledge of divinely ordained absolute rule."

⁶¹ <https://www.institute.global/insights/geopolitics-and-security/fundamentals-irans-islamic-revolution>

⁶² <https://www.tandfonline.com/doi/full/10.1080/03068374.2023.2174687>

⁶³ <https://www.bu.edu/history/files/2015/04/Khalaji-Apocalyptic-Politics-On-the-Rationality-of-Iranian-Policy.pdf>

⁶⁴ https://www.rand.org/content/dam/rand/pubs/monograph_reports/MR1320/RAND_MR1320.pdf

⁶⁵ https://digitalcommons.odu.edu/cgi/viewcontent.cgi?article=1008&context=gpis_etds

⁶⁶ https://digitalcommons.odu.edu/cgi/viewcontent.cgi?article=1008&context=gpis_etds

⁶⁷ <https://www.institute.global/insights/geopolitics-and-security/view-tehran-irans-militia-doctrine>

⁶⁸ <https://www.institute.global/insights/geopolitics-and-security/beyond-borders-expansionist-ideology-irans-islamic-revolutionary-guard-corps>

⁶⁹ For more on the permissibility of offensive jihad and its application in Khomeinist ideology see *Apocalyptic Politics – On the Rationality of Iranian Policy* by Mehdi Khalaji, <https://www.bu.edu/history/files/2015/04/Khalaji-Apocalyptic-Politics-On-the-Rationality-of-Iranian-Policy.pdf>, which states:

Since the time of the Safavids and after emergence of the theory that gives a partial amount of the Imam's authority to a Shiite jurist, some jurists started to discuss the legitimacy of offensive jihad. Khomeini's early view was that the order for offensive jihad was the exclusive right of the infallible Imam. But he changed his view later and came to the believe that "the Shiite jurist has all the authorities of the Imam except if there is religious proof that a specific right or authority of an Imam has to do with his personal identity and not his position as the head of the government." In a reply to a follower, Khamenei stated that offensive jihad can be ordered by a qualified jurist if it is in the interest of the Islamic Republic. In the transcript of Khamenei's unpublished courses, he advocated the theory that gives legitimacy to the ruling jurist's order for offensive jihad. Ayatollah Hossein Ali Montazeri, the Supreme Leader's mentor in religious law, also believes in the same theory. In his view, all offensive jihads are in fact defensive. In his Islamic Law Codes (Resaleh-ye Tozih al-masael), he writes, "the offensive jihad is a war that an Imam wages in order to invite infidels and non-monotheists to Islam or to prevent the violation of treaty of Ahl-e Zemmah. In fact, the goal of offensive jihad is not the conquest of other countries, but the defense of the inherent rights of nations that are deprived of power by the infidels, non-monotheists, and rebels from the worship of God, monotheism, and justice." He states that offensive jihad becomes an obligation for all Muslims when an infallible Imam or a ruling jurist orders it.

⁷⁰ <https://www.runi.ac.il/media/by3dfcrx/bariranianpolicy2009.pdf>

⁷¹ <https://referenceworks.brill.com/display/entries/EIEO/SIM-6965.xml>

⁷² <https://www.institute.global/insights/geopolitics-and-security/beyond-borders-expansionist-ideology-irans-islamic-revolutionary-guard-corps>

⁷³ <https://www.institute.global/insights/geopolitics-and-security/beyond-borders-expansionist-ideology-irans-islamic-revolutionary-guard-corps>

⁷⁴ <https://www.mei.edu/publications/irans-revolutionary-guard-and-rising-cult-mahdism-missiles-and-militias-apocalypse>

⁷⁵ <https://www.mei.edu/publications/irans-revolutionary-guard-and-rising-cult-mahdism-missiles-and-militias-apocalypse>

⁷⁶ <https://www.runi.ac.il/media/by3dfcrx/bariranianpolicy2009.pdf>

⁷⁷ <https://www.mei.edu/publications/irans-revolutionary-guard-and-rising-cult-mahdism-missiles-and-militias-apocalypse>

⁷⁸ <https://www.mei.edu/publications/irans-revolutionary-guard-and-rising-cult-mahdism-missiles-and-militias-apocalypse>

⁷⁹ Amir Taheri, *The Persian Night, Iran Under the Khomeinist Revolution*, New York and London, Encounter Books, October 19, 2012, P. 213 and 310

⁸⁰ <https://www.wsj.com/articles/SB121193151568724469>

⁸¹ <https://english.aawsat.com/home/article/1602821/amir-taheri/putin-join-mullahs%E2%80%99-deception-club>

⁸² Taheri, P. 176

⁸³ Taheri, ,P. 210

⁸⁴ <https://www.fdd.org/analysis/2024/01/28/president-joe-bidens-got-blood-on-hands-after-appeasing-iran-for-years/>

⁸⁵ <https://obamawhitehouse.archives.gov/realitycheck/the-press-office/remarks-president-obama-marking-nowruz;>
https://www.huffpost.com/archive/ca/entry/obama-make-it-clear-to-iran-that-the-u-s-is-prepared-to-increa_b_4214530;

⁸⁶ <https://www.wsj.com/articles/appeasing-iran-has-failed-biden-israel-hamas-e86e249c>

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- ⁸⁷ <https://www.theatlantic.com/international/archive/2024/02/iran-is-not-a-normal-country/677319/>
- ⁸⁸ <https://www.nytimes.com/2022/08/12/opinion/iran-america-nuclear-policy.html>
- ⁸⁹ <https://www.theatlantic.com/international/archive/2024/02/iran-is-not-a-normal-country/677319/>
- ⁹⁰ <https://www.nytimes.com/2022/08/12/opinion/iran-america-nuclear-policy.html>
- ⁹¹ <https://securecanada.org/wp-content/uploads/2021/04/C-CAT-Primer-on-Magnitsky-January-22-2020.pdf>; <https://www.iranintl.com/en/202404069938>; <http://www.nationalreview.com/corner/128721/politics-apology-stanley-kurtz>; <https://www.wsj.com/news/articles/SB121659929379969123?mg=prod/accounts-wsj>; also see Taheri, p 204 - 214; http://www.ohchr.org/EN/HRBodies/HRC/RegularSessions/Session34/Documents/A_HRC_34_65_AEV.docx
- ⁹² https://opencanada.org/payam_akhavan/
- ⁹³ <https://www.washingtoninstitute.org/policy-analysis/iran-intensifying-its-crackdown-citizens-abroad>
- ⁹⁴ <https://www.washingtoninstitute.org/policy-analysis/iran-intensifying-its-crackdown-citizens-abroad>
- ⁹⁵ <https://www.cfr.org/global-conflict-tracker/conflict/confrontation-between-united-states-and-iran>
- ⁹⁶ <https://securecanada.org/wp-content/uploads/2021/04/C-CAT-Primer-on-Magnitsky-January-22-2020.pdf> P. 62; <https://iinsa.org/new-nuclear-deal-wont-stop-iranian-aggression/>;
- ⁹⁷ <https://www.washingtoninstitute.org/policy-analysis/irans-support-terrorism-under-icpoa>; <https://www.theatlantic.com/ideas/archive/2021/06/iran-nuclear-deal-middle-east/619307/>
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- ⁹⁹ <https://securecanada.org/policies/canada-iran-and-human-rights/canada-iran-and-human-rights/>
- ¹⁰⁰ <https://ctc.westpoint.edu/wp-content/uploads/2022/04/Iran-Entangled.pdf>
- ¹⁰¹ <https://www.institute.global/insights/geopolitics-and-security/beyond-borders-expansionist-ideology-irans-islamic-revolutionary-guard-corps>
- ¹⁰² <https://henryjacksonsociety.org/wp-content/uploads/2023/07/IRGC-2023-Report.pdf>
- ¹⁰³ <https://www.tandfonline.com/doi/full/10.1080/03068374.2023.2174687>
- ¹⁰⁴ <https://ctc.westpoint.edu/trends-in-iranian-external-assassination-surveillance-and-abduction-plots/>
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- ¹⁰⁹ <https://www.mei.edu/publications/irans-revolutionary-guard-and-rising-cult-mahdism-missiles-and-militias-apocalypse>; <https://www.washingtoninstitute.org/policy-analysis/supreme-leader-and-guard-civil-military-relations-and-regime-survival-iran>;

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- ¹¹¹ From a prayer sermon in Tehran, October 7, 1984, quoted in Taheri, *The Persian Night*, P. 251
- ¹¹² <https://www.institute.global/insights/geopolitics-and-security/beyond-borders-expansionist-ideology-irans-islamic-revolutionary-guard-corps>
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- ¹¹⁸ https://www.foreign.senate.gov/imo/media/doc/Modell_Testimony.pdf; <https://www.federalregister.gov/documents/2007/12/19/07-6138/additional-designation-of-entities-pursuant-to-executive-order-13382>;
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- ¹²¹ <https://www.nytimes.com/2022/10/18/us/politics/iran-drones-russia-ukraine.html>
- ¹²² <https://www.csis.org/analysis/irans-revolutionary-guards-al-quds-force-and-other-intelligence-and-paramilitary-forces>: *"The links between the IRGC and Iran's nuclear program are so close that its leaders were singled out under the UN Security Council Resolutions passed on December 23, 2006, and March 24, 2007, and had their assets frozen. The commander, Major General Yahya Rahim Safavi, deputy commander, Brigadier General Morteza Rezaie, and the heads of the IRGC ground forces, naval branch, Al Quds Force, and Basij (Mobilization of the Oppressed Force) were all involved."*; <https://www.i24news.tv/en/news/middle-east/iran-eastern-states/1659255391-iran-threatens-to-build-nuclear-warheads-and-attack-new-york>; <https://www.ifri.org/sites/default/files/atoms/files/pp45chubin.pdf>; <https://apps.dtic.mil/sti/tr/pdf/ADA508073.pdf>; <https://www.federalregister.gov/documents/2007/12/19/07-6138/additional-designation-of-entities-pursuant-to-executive-order-13382>
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¹²⁶ <https://institute.global/policy/fundamentals-irans-islamic-revolution> ; <https://www.adl.org/resources/blog/quds-day-exposes-irans-genocidal-ambitions-again>; <https://www.timesofisrael.com/hold-iran-accountable-for-incitement-to-genocide-irwin-cotler-urges/>; <https://www.theatlantic.com/ideas/archive/2022/07/joe-biden-middle-east-israel-iran/670530/>; <https://institute.global/policy/fundamentals-irans-islamic-revolution>; <https://www.memri.org/reports/israels-eradication-%E2%80%93-ideological-and-practical-goal-irans-islamic-revolution-regime>

¹²⁷ <https://www.theatlantic.com/international/archive/2024/02/iran-is-not-a-normal-country/677319/>; <https://www.institute.global/insights/geopolitics-and-security/beyond-borders-expansionist-ideology-irans-islamic-revolutionary-guard-corps>; <https://www.memri.org/reports/israels-eradication-%E2%80%93-ideological-and-practical-goal-irans-islamic-revolution-regime>

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¹³⁵ <https://www.brookings.edu/articles/the-path-forward-on-iran-and-its-proxy-forces/>

¹³⁶ <https://www.hoover.org/research/soft-power-iranian-regime>

¹³⁷ <https://www.institute.global/insights/geopolitics-and-security/ideology-and-irans-revolution-how-1979-changed-world>

¹³⁸ <https://www.hoover.org/research/soft-power-iranian-regime>

¹³⁹ Richard Falk, "Trusting Khomeini", New York Times, 16 February 1979,

<https://www.nytimes.com/1979/02/16/archives/trusting-khomeini.html>

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¹⁴¹ <https://www.institute.global/insights/geopolitics-and-security/fundamentals-irans-islamic-revolution>; <https://www.economist.com/middle-east-and-africa/2021/01/21/disenchanted-iranians-are-turning-to-other-faiths>; <https://rusi.org/explore-our-research/publications/commentary/religion-soft-power-tool-irans-export-twelve-shia-islam-syria>

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- ⁴⁶⁹ See https://www.institute.global/insights/geopolitics-and-security/beyond-borders-expansionist-ideology-irans-islamic-revolutionary-guard-corps#footnote_63: "The Ayatollah sought to use the creation of an Islamic state in Iran as a platform to establish a pan-Islamist order that would encompass the entire Islamic ummah (global Muslim community) with Iran at its centre. This concept was theorised by Mohammad-Javad Larijani (who now serves as a senior advisor to Iran's current supreme leader) as the "theory of Umm al-Qura" and was incorporated as a key pillar of the Islamic Republic's foreign policy strategy, alongside the separate pillar of exporting the revolution. According to the theory of Umm al-Qura, "after the victory of the Islamic Revolution, Iran became the leader of the Islamic ummah (or world)" and "all Muslims have a responsibility to regard the guardianship and leadership of Imam Khomeini as the only leader of the Islamic ummah." In essence, the Umm al-Qura doctrine, which has had very little global analysis, not only seeks to position Iran's supreme leader as the leader of the Islamic ummah (community), but it aims to shift the centre and capital of Islam for all Muslims from Mecca and Medina to the Shia holy city of Qom in Iran" .
- ⁴⁷⁰ <https://www.criticalthreats.org/analysis/the-second-step-of-irans-islamic-revolution-exploring-the-supreme-leaders-worldview>
- ⁴⁷¹ Taheri, P. 299; <https://www.institute.global/insights/geopolitics-and-security/creating-radicals-inside-indoctrination-programme-irans-islamic-revolutionary-guard-corps>
- ⁴⁷² See Shmuel Bar, "Iranian Terrorist Policy and "Export of Revolution"", from The Ninth Annual Herzliya Conference on the Balance of Israel's National Security and Resilience, February 2009.
- ⁴⁷³ <https://committees.parliament.uk/writtenevidence/3119/pdf/>

⁴⁷⁴ <https://institute.global/sites/default/files/2020-01/IRGC%20Report%2027012020.pdf>

⁴⁷⁵ The 1989 amendments to Iran's constitution bolstered clerical guardianship of the state by making the supreme leader's authority and power "absolute". <https://www.institute.global/insights/geopolitics-and-security/what-velayat-e-faqih>

⁴⁷⁶ Alireza Jafarzadeh, *The Iran Threat, President Achmadinejad and the Coming Nuclear Crisis*, St. Martin's Press, Jan. 23, 2007 P.85

⁴⁷⁷ <https://www.washingtoninstitute.org/media/3471>; Taheri P. 228; various translations of Khomeini's claim below to absolute authority can be found in Sahife' Noor (letters and lectures of Ayatollah Khomeini), Volume 20, P. 170 quoted in <https://www.al-islam.org/shia-political-thought-ahmed-vaezi/what-wilayat-al-faqih>; <https://www.maryam-rajavi.com/en/wp-content/uploads/2023/11/Tolerant-Islam-vs.-Extremism-final.pdf>; and <https://www.latimes.com/archives/la-xpm-1988-01-31-op-39482-story.html>

In January 1988, the incumbent president and future *vali-e-faqih*, Ali Khamenei, said in a Friday prayer sermon that "governmental authority is contained within the bounds of divine edicts," Khomeini lambasted his protégé in an open letter: ...Such an interpretation of my words - that the government's authority is limited by divine edicts - totally contradicts my statements. If the government's authority were bound by secondary commandments, I would have to say that the divine rule and absolute authority conferred upon the Prophet would be devoid of meaning and content. . . . I should point out that governing is one dimension of the absolute authority of the Prophet's *velayat-e-faqih*. It is one of Islam's primary decrees, and takes precedence over all secondary commandments, even prayer, fasting, and the hajj. . . . The *vali-e-faqih* is empowered to unilaterally abrogate the religious commitments he has undertaken with the people should he find them

contrary to the interests of the nation and Islam. He can ban any religious or non-religious matter contrary to the interests of Islam. . . . The statements made, or being made, derive from a lack of knowledge of divinely ordained absolute rule.

⁴⁷⁸ <https://www.washingtoninstitute.org/policy-analysis/apocalyptic-politics-rationality-iranian-policy>

⁴⁷⁹ Said Amir Arjomand, , *After Khomeini, Iran Under His Successor*, Oxford University Press P.30 and 42.

⁴⁸⁰ http://www.sazegara.net/english/archives/2007/05/iranian_rights_abuses_systemic.html;
<https://news.harvard.edu/gazette/story/2007/05/iranian-rights-abuses-systemic/>

⁴⁸¹ <https://www.mei.edu/publications/irans-revolutionary-guard-and-rising-cult-mahdism-missiles-and-militias-apocalypse>

⁴⁸² See <https://www.mei.edu/publications/eternal-rivals-artesh-and-irgc>: "According to Article 143 of the Constitution, the Army is "responsible for guarding the independence and territorial integrity of the country, as well as the order of the Islamic Republic." Article 150 of the Constitution, on the other hand, stresses that the IRGC must "be maintained so that it may continue its role of guarding the Revolution and its achievements...[in] brotherly cooperation [with other branches of the armed forces]..."

⁴⁸³ See <https://www.mei.edu/publications/eternal-rivals-artesh-and-irgc>: "According to Article 143 of the Constitution, the Army is "responsible for guarding the independence and territorial integrity of the country, as well as the order of the Islamic Republic." Article 150 of the Constitution, on the other hand, stresses that the IRGC must "be maintained so that it may continue its role of guarding the Revolution and its achievements...[in] brotherly cooperation [with other branches of the armed forces]..."

⁴⁸⁴ <https://committees.parliament.uk/writtenevidence/3119/pdf/>

⁴⁸⁵ <https://www.washingtoninstitute.org/policy-analysis/irans-military-establishment-doubles-down-revolution#:~:text=According%20to%20Articles%203%2C%20152,principal%20objective%20as%20the%20IRGC.>

⁴⁸⁶ Iran (Islamic Republic of)'s Constitution of 1979 with Amendments through 1989, Constitute Project, https://www.constituteproject.org/constitution/Iran_1989.pdf?lang=en

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- ⁴⁸⁷ <https://www.rferl.org/a/1060431.html>
- ⁴⁸⁸ https://www.cia.gov/readingroom/docs/DOC_0000833182.pdf p1.;
<https://nstproceeding.com/index.php/nusciencetech/article/download/902/856/2763>
- ⁴⁸⁹ <https://institute.global/policy/beyond-borders-expansionist-ideology-irans-islamic-revolutionary-guard-corps>
- ⁴⁹⁰ Iran (Islamic Republic of)'s Constitution of 1979 with Amendments through 1989, Constitute Project,
https://www.constituteproject.org/constitution/Iran_1989.pdf?lang=en
- ⁴⁹¹ <https://www.cfr.org/backgrounder/irans-revolutionary-guards>
- ⁴⁹² <https://www.aei.org/articles/the-revolutionary-guards-role-in-iranian-politics/>
- ⁴⁹³ Daniel Byman, Shahram Chubin, Anoushiravan Ehteshami, Jerrold Green, *Iran's Security Policy in the Post- Revolutionary Era*, RAND, 2001, P.33.
- ⁴⁹⁴ <https://www.institute.global/insights/geopolitics-and-security/creating-radicals-inside-indoctrination-programme-irans-islamic-revolutionary-guard-corps> quoting Vanguard of the Imam: Religion, Politics, and Iran's Revolutionary Guards by Afshon Ostovar
- ⁴⁹⁵ <https://www.defensenews.com/global/mideast-africa/2021/12/16/iran-more-than-doubles-revolutionary-guards-budget-in-fy22-bill/>
- ⁴⁹⁶ <https://www.aei.org/articles/the-revolutionary-guards-role-in-iranian-politics/>:
Cooperation with the government in military and security matters, [including] pursuit and arrest of armed counterrevolutionary movements. ... Disarming unauthorized persons. ... Investigation and intelligence gathering. ... preserv[ation] of the public order at demonstrations and gatherings in order to prevent disruption of law and order ... [and] support for freedom and justice-seeking movements of oppressed people under the supervision of the Council of the Revolution, and with authorization from the government
- ⁴⁹⁷ <https://www.aei.org/articles/the-revolutionary-guards-role-in-iranian-politics/>
- ⁴⁹⁸ https://www.rand.org/content/dam/rand/pubs/monographs/2008/RAND_MG821.pdf
- ⁴⁹⁹ <https://irandataportal.syr.edu/constitution-of-the-revolutionary-guards-3>
- ⁵⁰⁰ <https://www.aei.org/articles/the-revolutionary-guards-role-in-iranian-politics/>
- ⁵⁰¹ <https://www.aei.org/research-products/report/how-intertwined-are-the-revolutionary-guards-in-irans-economy/>
- ⁵⁰² <https://www.cfr.org/backgrounder/irans-revolutionary-guards>
- ⁵⁰³ https://ciaotest.cc.columbia.edu/pbei/winep/0002193/f_0002193_1297.pdf
- ⁵⁰⁴ <https://www.the-american-interest.com/2007/04/08/iran-v-britain-who-blinked/>; Magnus Ranstorp, *Hizb'allah in Lebanon, The Politics of the Western Hostage Crisis*, Macmillan Press, 1997, P. 84.
- ⁵⁰⁵ <https://www.the-american-interest.com/2007/04/08/iran-v-britain-who-blinked>
- ⁵⁰⁶ "Revolutionary Guard Wields Power Inside and Outside Iran", by Gary Thomas, *Voice of America*, April 17, 2007, <http://www.sazegara.net/english/archives/news-links/>; Iran's Revolutionary Guard Branches Out", by Kim Murphy, *Los Angeles Times*, August 26, 2007, reprinted in the *Seattle Times*, http://seattletimes.nwsourc.com/html/nationworld/2003855126_iranguard
- ⁵⁰⁷ Robin Hughes, Mehdi Khalaji, Ali Alfoneh. Mohsen Sazegara, quoted in <https://securecanada.org/policies/ban-the-islamic-revolutionary-guard-corps-irgc-iranian/executive-summary/>

⁵⁰⁸ Ali Alfoneh, “Indoctrination of the Revolutionary Guards”, Middle Eastern Outlook, American Enterprise Institute for Public Policy Research, No.2 February 2009.

⁵⁰⁹ Wilfried Buchta, *Who Rules Iran*, Washington Institute for Near East Policy and the Konrad Adenauer Stiftung, 2000, P.70, quoting Kenneth Katzman, *The Warriors of Islam, Iran’s Revolutionary Guards*.

⁵¹⁰ <https://www.washingtoninstitute.org/policy-analysis/zarif-tape-revelations-russia-gods-force-and-irans-election>

⁵¹¹ <https://www.rand.org/pubs/monographs/MG821.html>

⁵¹² <https://www.eurasiareview.com/12102022-how-to-target-irans-kleptocracy-analysis/>

⁵¹³ FindACase – *Blais v. Islamic Republic of Iran*

http://dc.findacase.com/research/wfrmDocViewer.aspx/xq/fac.%5CFDCT%5CDDC%5C2006%5C20060929_0000602.DDC.htm/qx; for more on the IRGC sources of income see fn. 34 and 122.

⁵¹⁴ Jack Boureston and James A. Russell “Illicit Nuclear Procurement Networks and Nuclear Proliferation: Challenges for Intelligence, Detection, and Interdiction”, <https://www.jstor.org/stable/26472732>

⁵¹⁵ <https://www.institute.global/insights/geopolitics-and-security/beyond-borders-expansionist-ideology-irans-islamic-revolutionary-guard-corps>; <https://www.tandfonline.com/doi/full/10.1080/03068374.2023.2174687>

⁵¹⁶ <https://warontherocks.com/2017/03/spiritual-ardor-and-military-might-the-story-of-irans-revolutionary-guards/>

⁵¹⁷ <https://www.institute.global/insights/geopolitics-and-security/beyond-borders-expansionist-ideology-irans-islamic-revolutionary-guard-corps>; <https://www.tandfonline.com/doi/full/10.1080/03068374.2023.2174687>

⁵¹⁸ <https://warontherocks.com/2017/03/spiritual-ardor-and-military-might-the-story-of-irans-revolutionary-guards/>

⁵¹⁹ <https://foreignpolicy.com/2022/10/18/irans-revolutionary-guards-will-never-stand-down/>

⁵²⁰ <https://policyoptions.irpp.org/magazines/march-2023/terrorism-irgc/>;

⁵²¹ Taheri, P.55; see <https://referenceworks.brill.com/display/entries/EIEO/SIM-6965.xml> : “the act of “associating” with God, in other words, accepting the presence at His side of other divinities; it may be translated either literally, by associationism or, in more explicit fashion, by polytheism .”

⁵²² <https://learninglink.oup.com/protected/files/content/flashcardXlsx/1532468594522-Brodd---Invitation-to-World-Religions-3e---Chapter-13-Flashcards.xlsx>;
[https://en.wikipedia.org/wiki/Shirk_\(Islam\)#:~:text=Shirk%20\(Arabic%3A%20%D8%B4%D9%90%D8%B1%D9%92%D9%83%2C%20lit,powers%20alongside%20God%20as%20associates.](https://en.wikipedia.org/wiki/Shirk_(Islam)#:~:text=Shirk%20(Arabic%3A%20%D8%B4%D9%90%D8%B1%D9%92%D9%83%2C%20lit,powers%20alongside%20God%20as%20associates.)

⁵²³ Taheri, P.55

⁵²⁴ Taheri, P.56

⁵²⁵ <https://www.hoover.org/research/khomeini-ahmadinejad>; Amir Taheri, *Nest of Spies: America's Journey to Disaster in Iran* (New York: Pantheon Books, 1989), P. 269.

⁵²⁶ <https://www.institute.global/insights/geopolitics-and-security/beyond-borders-expansionist-ideology-irans-islamic-revolutionary-guard-corps>

⁵²⁷ <https://www.tandfonline.com/doi/full/10.1080/03068374.2023.2174687>

⁵²⁸ See above in Section #1-4

⁵²⁹ https://digitalcommons.odu.edu/cgi/viewcontent.cgi?article=1008&context=gpis_etds

⁵³⁰ https://digitalcommons.odu.edu/cgi/viewcontent.cgi?article=1008&context=gpis_etds

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- ⁵³¹ The IRGC was described as such by Supreme Leader Ali Khamenei on X on 01/17.2020, <https://twitter.com/StateDeptSpox/status/1247131632177422336/photo/1>
- ⁵³² <https://www.tandfonline.com/doi/full/10.1080/03068374.2023.2174687>
- ⁵³³ <https://www.institute.global/insights/geopolitics-and-security/beyond-borders-expansionist-ideology-irans-islamic-revolutionary-guard-corps>
- ⁵³⁴ <https://www.institute.global/insights/geopolitics-and-security/beyond-borders-expansionist-ideology-irans-islamic-revolutionary-guard-corps#executive-summary>; <https://www.tandfonline.com/doi/full/10.1080/03068374.2023.2174687>
- ⁵³⁵ <https://www.institute.global/insights/geopolitics-and-security/beyond-borders-expansionist-ideology-irans-islamic-revolutionary-guard-corps#executive-summary>
- ⁵³⁶ <https://institute.global/policy/beyond-borders-expansionist-ideology-irans-islamic-revolutionary-guard-corps>
- ⁵³⁷ Heydari, Ahmad & Farazi, Sadegh, Jihad and Defence in the Quran, IRGC Islamic Research Centre, Deputy of Ideological-Political Education of the Representative of the Supreme Leader in the IRGC, Autumn 2011. <https://bit.ly/38kC6Xl>
- ⁵³⁸ <https://institute.global/policy/beyond-borders-expansionist-ideology-irans-islamic-revolutionary-guard-corps>
- ⁵³⁹ https://www.rand.org/content/dam/rand/pubs/monograph_reports/MR1320/RAND_MR1320.pdf
- ⁵⁴⁰ http://www.sazegara.net/english/archives/2007/05/iranian_rights_abuses_systemic.html; <https://news.harvard.edu/gazette/story/2007/05/iranian-rights-abuses-systemic/>
- ⁵⁴¹ http://www.sazegara.net/english/archives/2007/05/iranian_rights_abuses_systemic.html
- ⁵⁴² <https://www.mei.edu/publications/irans-revolutionary-guard-and-rising-cult-mahdism-missiles-and-militias-apocalypse>
- ⁵⁴³ <https://www.washingtoninstitute.org/policy-analysis/supreme-leader-and-guard-civil-military-relations-and-regime-survival-iran>; <https://foreignpolicy.com/2023/01/30/iran-revolutionary-guard-terrorism-military-conscription/>
- ⁵⁴⁴ <https://institute.global/policy/beyond-borders-expansionist-ideology-irans-islamic-revolutionary-guard-corps>; <https://foreignpolicy.com/2023/01/30/iran-revolutionary-guard-terrorism-military-conscription/>
- ⁵⁴⁵ <https://www.institute.global/insights/geopolitics-and-security/beyond-borders-expansionist-ideology-irans-islamic-revolutionary-guard-corps>; <https://iranwire.com/en/features/65744/>
- ⁵⁴⁶ <https://www.fdd.org/analysis/2018/10/29/profiles-of-iranian-repression/#easy-footnote-bottom-120-70260> quoting: Kenneth Katzman, "Iran's Foreign and Defense Policies," *Congressional Research Service*, September 11, 2018, page 19. (<https://fas.org/spp/crs/mideast/R44017.pdf>); Gareth Smyth, "Crucial role of Basij in Iran power play," *The Arab Weekly*, October 30, 2015. (<https://theArabweekly.com/crucial-role-basij-iran-power-play>); Saeid Golkar, *Captive Society: The Basij Militia and Social Control in Iran* (Washington: Woodrow Wilson Center Press and Columbia University Press, 2015), pages 52-53.
- ⁵⁴⁷ <https://www.institute.global/insights/geopolitics-and-security/beyond-borders-expansionist-ideology-irans-islamic-revolutionary-guard-corps>; <https://iranwire.com/en/features/65744/>
- ⁵⁴⁸ <https://home.treasury.gov/news/press-releases/sm524>
- ⁵⁴⁹ <https://foreignpolicy.com/2022/10/18/irans-revolutionary-guards-will-never-stand-down/>
- ⁵⁵⁰ <https://foreignpolicy.com/2023/01/30/iran-revolutionary-guard-terrorism-military-conscription/>
- ⁵⁵¹ <https://www.canada.ca/en/global-affairs/news/2024/04/canada-imposes-further-sanctions-against-iran.html>

⁵⁵² <https://www.canada.ca/en/global-affairs/news/2024/04/canada-imposes-further-sanctions-against-iran.html>

⁵⁵³ <https://www.canada.ca/en/global-affairs/news/2023/08/canada-sanctions-iranian-regime-for-activities-that-gravely-threaten-international-peace-and-security.html>

⁵⁵⁴ <https://laws-lois.justice.gc.ca/eng/regulations/sor-2010-165/fulltext.html>

⁵⁵⁵ <https://www.cbc.ca/news/canada/nova-scotia/halifax-man-acquitted-on-charge-of-violating-syrian-trade-sanctions-1.5835784>

⁵⁵⁶ <https://unesdoc.unesco.org/ark:/48223/pf0000232934>

⁵⁵⁷ https://www.nato.int/cps/en/natohq/topics_77646.htm

⁵⁵⁸ https://econ.ucalgary.ca/manageprofile/sites/econ.ucalgary.ca.manageprofile/files/unitis/publications/1-9203680/Oxoby_Sentencing_Terrorist_Prosecutions.pdf; see fn. 122 ad locum

⁵⁵⁹ Al Qaeda Weapons of Mass Destruction Threat: Hype or Reality? By Rolf Mowatt-Larssen, Harvard Kennedy Scholl Belfer Center for Science and International Affairs, January 2010

⁵⁶⁰ In an unusually blunt statement... Eliza Manningham-Buller, head of Britain's MI5 espionage agency said it is “only a matter of time” until a terrorist attack is perpetrated using a “dirty bomb.”; c. Experts at Los Alamos National Laboratory concluded in 2003 that “a RDD [radiological dispersal device] attack somewhere in the world is long overdue.”; d. Eugene Habiger, the four-star general who oversaw strategic nuclear weapons until 1998 and then ran the nuclear anti-terror program for the U.S. Department of Energy: ““It is not a matter of *if*: it’s a matter of *when*.” (New York Times Magazine May 2002

⁵⁶¹ Yael Ronen, *Incitement to Terrorist Acts and International Law*, September 2010, Leiden Journal of International Law 23(03):645 – 674 DOI:[10.1017/S0922156510000269](https://doi.org/10.1017/S0922156510000269),

⁵⁶² <https://lawcat.berkeley.edu/record/383747?ln=en> : “Mayer has stressed the importance of apocalyptic views, conspiracy theories and the feeling of being threatened in legitimising violent action: “when the feeling that one’s very existence is threatened develops, extreme behaviour suddenly seems justifiable”.

⁵⁶³ https://www.canlii.org/en/commentary/doc/2019CanLIIDocs4640#!fragment/zoupio-Tocpdf_bk_1/BQCwhgziBcwMYgK4DsDWszlQewE4BUBTADwBdoAvbRABwEtsBaAfx2zhoBMAzZg1TMAjAEoANMmyICEAlqJCuAJ7QA5KrERCYXAnmKV6zdt0gAynlIAhFQCUAogBI7ANQCCAOQDC9saTB80KTsljJAA

⁵⁶⁴ Marja Lehto, *Indirect Responsibility for Terrorist Acts, Redefinition of the Concept of Terrorism Beyond Violent Acts*, Leiden • Boston 2009

⁵⁶⁵ Ibid.

⁵⁶⁶ Ibid.

⁵⁶⁷ Justice C. William Hourigan in *Tracy v. Iran* 2017 ONCA 549

⁵⁶⁸ https://econ.ucalgary.ca/manageprofile/sites/econ.ucalgary.ca.manageprofile/files/unitis/publications/1-9203680/Oxoby_Sentencing_Terrorist_Prosecutions.pdf and see fn. 122: “Of the twenty-four reported sentencing decisions in terrorism cases, nineteen have expressly remarked on the uniquely serious nature of terrorism offences: R v Khawaja, 248 CCC (3d) 233 at para 24 [Khawaja Sentencing], [2009] OJ No 4279, quoting R v Martin, (1999) 1 Cr App R (S) 477 at 48; Khawaja ONCA, supra note 26 at paras 230 – 238 & 251; Khawaja SCC, supra note 9 at para 126; Alizadeh, supra note 48 at para 1; Thambathurai BCCA, ibid at para 19 – 21; R v Khalid, 2009 CarswellOnt 9874 at para 108 [Khalid ONSC], [2009] OJ No 6414; Khalid ONCA, supra note 44 at para 3; NY, supra note 11 at para 24; R v Gaya, 2010 ONSC 434 at para 117 – 118 [Gaya ONSC]; Gaya ONCA, supra note 41 at para 19; Amara, supra note 38 at paras 140 – 142; Abdelhaleem, supra note 37 at para 62; Dirie, supra note 40 at para 32; Habib, supra note 37 at paras 37 – 41; Larmond, supra note 45 at para 4; Hersi, supra note 33 at paras 52 – 54 & 63; Esseghaier, supra note 32 at para 97; Namouh, supra note 31 at para 36, citing Khawaja at para 24;

Ahmed ONSC, supra note 34 at para 77 – 80. Three decisions simply allude to the special seriousness of terrorism offences, noting the unique harms flowing from terrorism instead (see Thambaiturai, supra note 49 at para 16; Amara ONCA, supra note 117 at para 18; Ahmad, supra note 39 at paras 52 & 58). Just two of the reported sentencing decisions neither expressly reference the special seriousness of terrorism offences nor their harmful effects (see Chand, supra note 29; Ahmed ONCA, supra note 19). The silence in Chand on this point may result from the timing of its release, which was one month before the Ontario Court of Appeal released its decision in Khawaja outlining the uniquely serious nature of terrorism offences (see Khawaja ONCA, supra note 26 at paras 230 – 238 & 251). Other decisions outside of terrorism cases have also remarked on the uniquely harmful nature of terrorism offences, although some have compared the harm from terrorism to other offences. See, for instance, R v Reyat, 2011 BCSC 14 at para 71 where the court defines terrorism as “an existential threat to Canadian society in a way that murder, assault and other crimes are not...terrorists reject and challenge the very foundations of Canadian society” (see Canada, Commission of Inquiry into the Investigation of the Bombing of Air India Flight 182, Air Indian Flight 182, a Canadian Tragedy (Ottawa: Public Works & Government Services Canada, 2009), vol 1).”

⁵⁶⁹ See Khawaja ONCA, supra note 26 at para 19: “The unique nature of [presumably all] terrorism-related offences, and the special danger that these crimes pose to Canadian society” quoted in https://econ.ucalgary.ca/manageprofile/sites/econ.ucalgary.ca.manageprofile/files/unitis/publications/1-9203680/Oxoby_Sentencing_Terrorist_Prosecutions.pdf

⁵⁷⁰ <https://journal.queenslaw.ca/sites/qljwww/files/Issues/Vol%2039%20i2/7.%20Diab.pdf>

⁵⁷¹ Khawaja ONCA, supra note 26 at para 231. See also Khalid ONCA, supra note 44 at para 32. Or, as the Ontario Court of Appeal stated in Khawaja, sentencing terrorism was not “business as usual.” See Khawaja ONCA, supra note 26 at para 212.

⁵⁷² <http://www.duhaimelaw.com/2011/07/02/supreme-court-agrees-to-hear-challenge-to-anti-terrorism-law/>

⁵⁷³ <https://securecanada.org/jvta/jvta-summary/>; <https://laws-lois.justice.gc.ca/eng/acts/j-2.5/FullText.html>

⁵⁷⁴ <https://globalnews.ca/news/10218687/man-waved-terrorist-flag-arrested-and-charged-toronto-police/>

⁵⁷⁵ <https://www.ndtv.com/india-news/canada-is-a-rule-of-law-country-pm-justin-trudeau-on-arrest-of-3-indians-5591558>

⁵⁷⁶ <https://www.jeffreismanlaw.ca/the-nature-and-purpose-of-criminal-law/>

⁵⁷⁷ https://jura.ku.dk/jurabog/pdf/juridiske-monografier/joergensen_values_in_law_1978.pdf

⁵⁷⁸ <https://www.criminal-code.ca/criminal-code-of-canada-section-718-purpose/index.html>

⁵⁷⁹ https://lop.parl.ca/sites/PublicWebsite/default/en_CA/ResearchPublications/201945E

⁵⁸⁰ <https://link.springer.com/article/10.1007/s11196-022-09928-z>;

⁵⁸¹ <https://globalnews.ca/news/9184757/iran-islamic-revolutionary-guard-corps-terrorism-list-mahsa-amini-protests/>

⁵⁸² See page 45

⁵⁸³ <https://jiss.org.il/en/amidror-irans-ring-of-fire/>

⁵⁸⁴ <https://jiss.org.il/en/dostri-israel-must-launch-a-forceful-response-against-iran/>

⁵⁸⁵ <https://www.atlanticcouncil.org/wp-content/uploads/2020/02/IRAN-DIGITAL.pdf>

⁵⁸⁶ <https://www.atlanticcouncil.org/wp-content/uploads/2020/02/IRAN-DIGITAL.pdf>

⁵⁸⁷ <https://www.atlanticcouncil.org/wp-content/uploads/2020/02/IRAN-DIGITAL.pdf>

⁵⁸⁸ <https://www.atlanticcouncil.org/wp-content/uploads/2020/02/IRAN-DIGITAL.pdf>

⁵⁸⁹ <https://www.atlanticcouncil.org/wp-content/uploads/2020/02/IRAN-DIGITAL.pdf>

⁵⁹⁰ <https://www.mei.edu/publications/revolutionary-narratives-islamic-republics-greatest-strength>

⁵⁹¹ <https://www.inss.org.il/wp-content/uploads/2019/10/Haiminis.pdf>

⁵⁹² <https://www.atlanticcouncil.org/wp-content/uploads/2020/02/IRAN-DIGITAL.pdf>;
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⁵⁹³ <https://www.atlanticcouncil.org/wp-content/uploads/2020/02/IRAN-DIGITAL.pdf>

⁵⁹⁴ <https://www.atlanticcouncil.org/wp-content/uploads/2020/02/IRAN-DIGITAL.pdf>

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