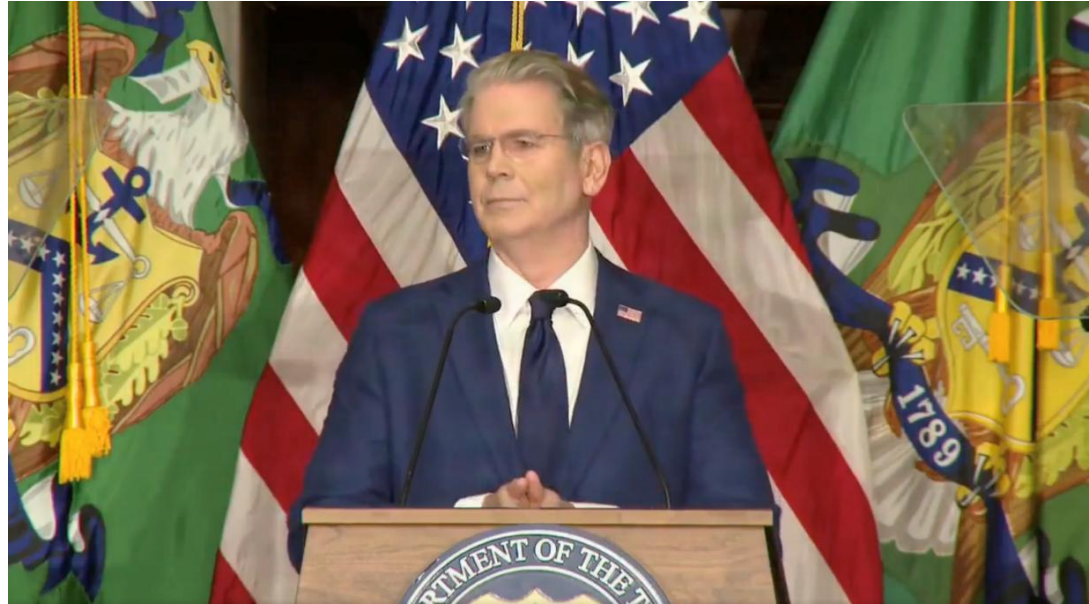


AUGUST 26, 2026



## UANI'S 10 RECOMMENDATIONS FOR OPERATION ECONOMIC OUTCAST

UNITED  
AGAINST  
NUCLEAR  
**IRAN**

## **ABOUT UANI**

United Against Nuclear Iran (UANI) is a nonprofit and non-partisan policy organization formed to combat the threats posed by the Islamic Republic of Iran.

## **OUR MISSION**

UANI educates the public, policymakers, and businesses about the danger posed by the Iranian regime and designs programs to ensure the regime's economic and diplomatic isolation until it abandons its pursuit of nuclear weapons, support for terrorism, regional destabilization, and human rights violations.

### **CONTACT**

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*Statement by Governor Jeb Bush and Ambassador Mark D. Wallace*

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# FOREWORD



*“We applaud President Trump, Secretary Bessent, and the U.S. government for declaring this unprecedented ‘Economic D-Day’ against the Iranian regime.*

*“There is much that can still be done to pressure the regime economically, and UANI is sharing concrete policy recommendations for how to effectively implement Operation Economic Outcast. For example, the U.S. should sanction the entirety of Iran’s ‘ghost fleet’ of tankers and their owners, captains, and crews. It should also sanction banks in China, Turkey, and elsewhere that are facilitating the purchase of Iranian energy products.*

*“This operation comes at an opportune time. The U.S. blockade is devastating the Iranian economy like never before, by choking Iranian oil sales and disrupting supply chains. Now is the time for more pressure, to weaken the regime and its ability to threaten the global economy and rebuild its military after Operation Epic Fury.*

*“We stand ready and willing to be a partner to everyone involved in this operation.”*

- Governor Jeb Bush: Chairman, UANI
- Ambassador Mark D. Wallace: CEO, UANI

**UANI'S 10  
RECOMMENDATIONS  
FOR OPERATION  
ECONOMIC OUTCAST**

*Under President Donald J. Trump's historic Operation Economic Outcast, the United States and its allies and partners should pursue a comprehensive strategy to dismantle the Iranian regime's ability to generate, move, conceal, and deploy financial resources. The objective should not simply be to add additional names to sanctions lists, but to systematically shatter the financial, commercial, maritime, and procurement networks and infrastructure that allows the Islamic Republic regime, the Islamic Revolutionary Guard Corps (IRGC), and Iran-backed terrorist proxies to operate internationally.*

*United Against Nuclear Iran (UANI) is outlining ten policy recommendations, which should form the core of Operation Economic Outcast:*

### **1. Throttle Iran's terrorist-finance and banking system**

Sanction every Iranian bank, financial institution, and exchange house including all foreign branches that provides material support to the IRGC, Iran's Intelligence Ministry, or designated terrorist proxies. Call on central banking authorities and financial regulators in all countries to shut down Iran's foreign bank branches. Impose secondary sanctions on foreign banks that maintain correspondent, clearing, or other material relationships with these institutions. Target the shadow banks, front companies, and foreign accounts that enable Iran's financial system to circumvent sanctions.

### **2. Attack the complete Iran energy products sales chain**

Fully target Iran's "Ghost Armada" of foreign-owned vessels, including interdictions, and likewise fully target the enabling network of owners, operators, insurers, flag registries, ports, terminals, ship agents, and maritime service providers. Captains and crew who facilitate illicit shipments should also be sanctioned.

Impose secondary sanctions on repeat purchasers of Iranian crude, liquified petroleum gas (LPG), refined products, and petrochemicals, including the many dozens of Chinese "teapot" refineries and traders that deliberately disguise Iranian-origin products. This should include end-user manufacturers that utilize Iranian-origin refined oil, petrochemical products, or gas in their production processes. Many of these entities operate outside major financial networks, making them difficult to identify and target under current sanctions authorities. This approach would build on existing U.S. sanctions precedent, including measures targeting global manufacturers found to be using materials sourced through Uyghur forced labor.

### **3. Cut off Iran's energy revenue conversion networks**

Target the financial infrastructure that converts Iranian oil and petrochemical proceeds into usable foreign currency. This should include Chinese, Turkish, and other foreign banks, exchange houses, commodity traders, front companies, and intermediaries that settle or repatriate Iranian export revenues, including Yuan-denominated proceeds.

#### **4. Dismantle Iran's strategic procurement networks**

Establish a multinational effort to identify and sanction networks procuring dual-use goods and goods with military applications for Iran's ballistic missile, drone, nuclear, and military programs. Target both Iranian end users as well as foreign manufacturers, brokers, trading companies, freight forwarders, financial institutions, universities, research institutions, and other facilitators, particularly in China, Turkey, and other key jurisdictions. Foreign government institutions and officials who continue to enable these activities should be sanctioned as well.

#### **5. Target the professional enablers**

Sanction professional and commercial actors that knowingly facilitate Iranian sanctions evasion, including corporate service providers, accountants, brokers, customs intermediaries, shipping agents, insurers, logistics firms, and related services. Establish a "repeat-facilitator" regime under which persistent enablers face escalating sanctions leading to criminal prosecution.

#### **6. Establish International Iran Sanctions Enforcement Task Forces**

Create an Iran Sanctions-Evasion Task Force (ISETF) in coordination with U.S., European, Gulf, and other partner agencies to coordinate sanctions, financial intelligence, customs, maritime enforcement, and law enforcement. Working groups should focus on shadow banking, oil and shipping, procurement, IRGC networks, trade-based money laundering, cryptocurrency, and professional enablers. At the same time, create a parallel Iranian Elites, Proxies, and Oligarchs Task Force (IEPO) to trace and pursue illicit assets held by regime elites, IRGC figures, proxies, and front companies. Where available, pursue freezes, forfeiture, prosecutions, extradition, and deportation.

#### **7. Isolate Iran's transportation infrastructure**

Target the shipping and aviation networks that support the IRGC, sanctions evasion, weapons procurement, and terrorist financing. Deny Iranian airlines and their foreign partners landing rights, overflight, refueling, maintenance, insurance, leasing, and ground services. Apply similar pressure to vessels, ports, terminals, insurers, and maritime service providers repeatedly facilitating Iranian evasion.

#### **8. Redeploy available regime assets for the Iranian people**

Work with European and other allies to confiscate and deploy eligible Iranian regime assets and proceeds of criminal activity to support Iranian civil society (including a strike fund), independent media, internet freedom, humanitarian assistance, and democratic aspirations.



## **9. Pursue a strategic communications hub**

Establish a Farsi-language strategic communications hub explaining sanctions directly to the Iranian people: communicating the actions, impact, and consequences of Operation Economic Outcast. This strategic communications hub should also focus on exposing regime corruption, countering the Iranian regime's disinformation, propaganda, and psychological warfare efforts – while emphasizing that economic pressure is directed at the regime and its enabling networks.

## **10. Sanction and pursue criminal indictments of the remaining Iranian leadership**

This should include Supreme Leader Mojtaba Khamenei, Speaker of Parliament Mohammad Bagher Ghalibaf, one of the most corrupt actors in the Iranian system, and all senior military commanders and security officials. Additionally, the U.S. government and its allies and partners should sanction President Masoud Pezeshkian and Foreign Minister Abbas Araghchi. As part of these sanctions, these jurisdictions should deny visas for these men and their families. Sanctioned officials should be subject to coordinated asset freezes and visa restrictions across allied jurisdictions, with restrictions also applied to individuals who knowingly assist them in evading sanctions.

Criminal prosecutions should be initiated against senior Iranian regime leaders to the extent permitted by law. INTERPOL Red Notices should also be pursued as permitted by law.

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