

EXHIBIT 88

~~Filed Pursuant to~~
~~General Order~~
~~No. 03-21~~

Confidential—Subject to the Protective Order

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

ABDIQAFAR WAGAFE, *et al.*, on
behalf of themselves and others similarly
situated,

Plaintiffs,

v.

DONALD TRUMP, President of
the United States, *et al.*,

Defendants.

No. 2:17-cv-00094-RAJ

EXPERT REPORT OF NARGES BAJOGHLI

I, Narges Bajoghli, hereby declare:

I make this declaration based on my own personal knowledge, and if called to testify, I could and would do so competently as follows:

Qualifications

1. I am an Assistant Professor of Middle East Studies at the School of Advanced International Studies (SAIS) of Johns Hopkins University. I received my Ph.D. in socio-cultural anthropology from New York University in 2016, where my dissertation was awarded the Dean's Outstanding Dissertation Award in the Social Sciences. Prior to my professorship at Johns Hopkins, I was a postdoctoral research associate in International and Public Affairs at Brown University from 2016 to 2018. I hold a Masters Degree in Social Sciences, Department of Anthropology, from the University of Chicago, a Masters Degree in Anthropology from New York University, an MPhil in Anthropology from New York University, and a graduate certificate in culture and media from New York University. I received my Bachelor's Degree from the Department of Political Science at Wellesley College. A copy of my curriculum vitae is attached as **Exhibit A**.

Confidential—Subject to the Protective Order

2. I am trained as a political anthropologist, media anthropologist, and documentary filmmaker. My areas of research include Iran's military and paramilitary forces (specifically the Islamic Revolutionary Guard Corps (IRGC), Basij militia, and Ansar-e Hezbollah); intersections of power and media; and militaries and conflict in the Middle East. I have taught a number of courses on the Iranian Revolution, media and the Middle East, and related topics.

3. My book *Iran Reframed: Anxieties of Power in the Islamic Republic* was published by the Stanford University Press in September 2019. In addition to my academic writing, I have written for *The New York Times*, *The New York Times Magazine*, *Foreign Affairs*, *The Guardian*, *Foreign Policy*, and *Jacobin*. I have appeared as a guest commentator on Iranian politics on *CNN*, *DemocracyNow!*, *NPR*, *BBC WorldService*, *BBC NewsHour*, and *PBS NewsHour*.

4. I am the only researcher in the West who has conducted ethnographic research over a 10-year period in Iran among the IRGC, Basij, and Ansar-e Hezbollah. Some of the results of my research were published in my book *Iran Reframed*. Other results will be published in a second, forthcoming book. My research included spending long periods of time with various factions of these organizations. I conducted more than 200 interviews with members of IRGC, Basij, and Ansar-e Hezbollah, and spent most of my days in the field with members of IRGC, Basij, and Ansar-e Hezbollah at their workplaces and during their off-work hours.

5. I am the co-founder of the nonprofit organization Iranian Alliances Across Borders (IAAB), a grassroots organization dedicated to youth empowerment in the Iranian diaspora.

6. The Plaintiffs have asked me to provide my opinion about the cited bases for the United States Citizenship and Immigration Services' (USCIS) denial of named plaintiff Mehdi Ostadhassan's green card application, also called an adjustment of status or I-485 application. Specifically, I will provide my opinion about the bases for denial that discuss Mr. Ostadhassan's former connection to the Basij.

Confidential—Subject to the Protective Order

Basis of Opinion

7. My opinion is based on the expertise I have developed about the Basij and other Iranian paramilitary groups in the course of my academic career, including through original research.

8. I have also reviewed documents from discovery produced by the government and transcripts of depositions conducted in this litigation. The documents I have reviewed begin with the following Bates numbers: DEF-00358660 (video file), DEF-00358661 (video file), DEF-00399255, DEF-00422120, and DEF-00427012. In addition, I have reviewed the court reporter's transcripts and associated exhibits for the depositions of Christopher Heffron on December 12, 2019, Matthew Emrich on January 8, 2020, and Amy Lang on January 30, 2020. The list of documents I reviewed is attached as **Exhibit B**.

Opinion

9. It is my opinion that USCIS misunderstood Mr. Ostadhassan's statements about his connection to the Basij in Iran and erroneously relied on his prior membership in the Basij as a basis to deny his I-485 application. *See* DEF-00427015.

10. On or around February 4, 2014, Mr. Ostadhassan submitted his first I-485 application, which Mr. Ostadhassan and his wife had prepared without the assistance of a lawyer. After he submitted his application, but before USCIS conducted his I-485 interview, Mr. Ostadhassan retained an immigration lawyer who reviewed his case and advised him that he should supplement his application with certain additional information.

11. Following her advice in good faith, Mr. Ostadhassan submitted an addendum to his I-485 application at the time of his I-485 interview on September 24, 2015. In the amended application, Mr. Ostadhassan voluntarily disclosed, among other things, that he had been a member of the "Basij Students" from 1997 to 2001 (that is, during the time he was approximately 13 or 14 to approximately 17 years old). DEF-00422289. (A background explanation of the Basij is described in the next section of this report.)

Confidential—Subject to the Protective Order

12. [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

13. On or around April 5, 2017, Mr. Ostadhassan received a Notice of Intent to Deny (NOID) his amended first I-485 application from USCIS. The NOID stated that Mr. Ostadhassan’s former affiliation with the Basij suggested he had been involved in human rights abuses. *See* DEF-00422253–DEF-00422254.

14. On or around May 5, 2017, Mr. Ostadhassan and his attorney responded to the NOID in writing. Through his attorney, Mr. Ostadhassan clarified that he was a member of only “the division [of the Basij] for students,” which he translated in the letter as “the Pupil Basij.” DEF-00422135. Mr. Ostadhassan stated in an accompanying sworn affidavit that the division of the Basij which he had been a part of was “a non-militia branch of Basij for students who are not yet in university,” which is consistent with his disclosure that his involvement spanned from 1997 to 2001, years when he was a high school student. DEF-00422139. Mr. Ostadhassan further explained that he “only participated in cultural, scientific and religious activities” while in the Basij; that the Basij “was the only available student organization in every school in Iran during [his] high school years;” that it was a “very popular and common” school activity; and

Confidential—Subject to the Protective Order

that he never “perform[ed] any military related training” as part of his activities with the Basij. *Id.* Mr. Ostadhassan further stated that he “was not involved with any Basij activities” after “graduat[ing] from high school at age 17,” as he “did not want to join the university Student Basij.” *Id.* This is wholly consistent with his testimony at his interview for his amended first I-485 application. DEF-00358660 at 59:20–59:26 (Interviewer: “And . . . when did your membership [in the Basij] end? Or when did your affiliation end with that group?” Mr. Ostadhassan: “When I technically entered college.”).

15. On or around October 27, 2017, Mr. Ostadhassan received a letter from USCIS denying his amended first I-485 application. DEF-00422121–DEF-00422128. Among the reasons for denial, USCIS stated that “the Basij was involved in human rights abuses” during the time Mr. Ostadhassan was a member, and that his “membership and involvement with the Basij organization” was “a significant negative factor” in its decision to deny his application. DEF-00422123.

16. The denial letter further stated that Mr. Ostadhassan’s testimony about whether he was affiliated with the Basij *Pupils* organization versus the Basij *Students* organization was “contradict[ory],” creating “serious doubts regarding the credibility of [his] claim that [he was] not a member of Student Basij.” DEF-00422124–DEF-00422125.

17. On or around November 8, 2017, Mr. Ostadhassan submitted a second I-485 application where he disclosed that he had been a member of the “Student Pupil Basij” from 1993 to 2000 (that is, during the time he was approximately 9 or 10 to approximately 16 or 17 years old). DEF-00427047. He again stated that “the Student Pupil Basij” was “for younger kids (ages 7-18) and “had no military or paramilitary activity or purpose,” instead “focus[ing] on cultural and religious [activities], specifically learning Quran.” DEF-00427049. Mr. Ostadhassan noted that “[t]he group that [he] belonged to had no military association” and that Basij members engaged in “paramilitary types of activities” only if they became “a member of the main Basij outside of school which was not my case.” *Id.* He explained that he joined the group because he “was a minor at this time and wanted to participate in Quranic activities in

Confidential—Subject to the Protective Order

[his] community,” and that at the time “it was the only organization that was available to us and somehow it was mandatory for everyone to be part of it.” *Id.*

18. Mr. Ostadhassan received neither an interview nor a second NOID in connection with his second I-485 application.

19. On or around April 10, 2019, Mr. Ostadhassan received a letter from USCIS denying his second I-485 application. DEF-00427013–DEF-00427026. This second denial letter repeated identical language from the first denial letter regarding Mr. Ostadhassan’s prior affiliation with the Basij, stating that “the Basij was involved in human rights abuses” during the time Mr. Ostadhassan was a member, and that his “membership and involvement with the Basij organization” was “a significant negative factor” in its decision to deny his application. DEF-00427015. Again, USCIS repeated verbatim its earlier determination that Mr. Ostadhassan’s testimony about whether he was affiliated with the Basij *Pupils* organization versus the Basij *Students* organization was “contradict[ory],” creating “serious doubts regarding the credibility of [his] claim that [he was] not a member of Student Basij.” DEF-00427016–DEF-00427017.

20. USCIS’s characterization of Mr. Ostadhassan’s testimony regarding his prior membership in the Basij is deeply problematic. In my opinion, USCIS’s [REDACTED], NOID, and two denial letters place undue weight on the alleged contradiction between Mr. Ostadhassan’s initial testimony that he was once part of “Basij Students” and his later clarification that he was part of the “Pupil Basij.” In the context of my academic, cultural, and linguistic expertise about the Basij and the Persian language, I believe USCIS has fundamentally misunderstood Mr. Ostadhassan’s testimony about his prior affiliation with the Basij.

21. It is crucial to know that in Persian there are distinct words used to describe the difference between a student prior to the university level (*i.e.*, students in elementary, middle, or high school) (*danesh-amuz*) and a university student (*danesh-ju*). In Persian, the word for what the discovery documents call the “Pupil Basij” is *Basij-e danesh-amuz*. The word for what the discovery documents call the “Student Basij” is *Basij-e danesh-ju*. These two sections of the Basij are clearly distinguishable in the Persian language, because the words used to refer to a

Confidential—Subject to the Protective Order

high school student versus a university student are *not* interchangeable. But in English, the word “student” may refer to any level of education, whether an elementary school student, a high school student, a university student or a graduate student. Therefore, I am not surprised that a native Persian speaker like Mr. Ostadhassan—who has no reason to be familiar with the English translations of *Basij-e danesh-amuz* and *Basij-e danesh-ju* that English-language academics have developed to study the Basij—translated the *Basij-e danesh-amuz* as “Basij Students,” rather than “Basij Pupils.” I would not expect a layperson like Mr. Ostadhassan to know or understand that in fact English-language materials about the Basij largely refer to *Basij-e danesh-amuz* as “Pupil Basij” and to *Basij-e danesh-ju* as “Student Basij.” Moreover, because in modern English parlance “pupil” is not as commonly used as “student,” it is highly likely that a native Persian speaker who has learned English as a foreign language would naturally translate *Basij-e danesh-amuz* into “Basij Students,” without at all intending to refer to the *Basij-e danesh-ju*.

22. I believe USCIS is mistaken to interpret Mr. Ostadhassan’s initial reference to “Basij Students,” *see* DEF-00422289, and then his clarification that he was in the “Pupil Basij” or “Student Pupil Basij,” *see* DEF-00422135, DEF-00427047, as evidence that he was concealing, or attempting to conceal, information. Rather, this discrepancy suggests a misunderstanding across linguistic and cultural lines. In my opinion, the most salient aspect of Mr. Ostadhassan’s testimony regarding his prior membership in the Basij is that he has consistently and credibly stated that he was part of the Basij only while aged 17 or younger, prior to his university years.

23. There is a vast difference between *Basij-e danesh-amuz* (which for simplicity I will call the “High School Basij” in this report, although as explained *danesh-amuz* refers to students at any level prior to entering university) and *Basij-e danesh-ju* (which I will call the “University Basij” in this report).

24. The University Basij organizations are forces on university campuses that often (though not exclusively) police student activities, especially on campuses with a long history of student activism against the Iranian state.

Confidential—Subject to the Protective Order

25. The High School Basij (which Mr. Ostadhassan has translated in his various application materials as “Pupil Basij,” “Basij Students,” or “Student Pupil Basij”), is an organization that many students in Iran—mostly high-school-aged, but occasionally younger—must join to go on certain school field trips or to participate in certain extra-curricular activities. Mr. Ostadhassan’s characterization of his participation in this division of the Basij as “somehow . . . mandatory” is wholly consistent with my knowledge of the *Basij-e danesh amuz*. See DEF-00427049.

26. Thus, if an applicant was formerly affiliated with only the High School Basij, that alone does not make him or her a national security threat. Rather, membership in the High School Basij is very common for high school students in Iran, especially for the generation that was born in the 1980s like Mr. Ostadhassan. To view membership in the High School Basij as a national security threat is to fundamentally and completely misunderstand Iranian society, the Iranian education system, and in fact, the Basij itself.

27. My research and writing over the past decade on the Basij and IRGC in Iran has made clear that, because of the fraught relationship between Iran and the United States since the 1979 Iranian Revolution, there is generally a poor understanding in the United States about the Basij and about the Islamic Republic more broadly. Furthermore, in my experience many secondary sources or “fact sheets” about the Basij available in English are based on a) an uncritical reading and reproduction of Basij propaganda about itself; or b) studies from afar that rely on secondary sources with no actual research in Iran nor interviews with current members of the organization. Without well-informed and nuanced educational training about the Basij and Iranian society, many of the secondary sources or “fact sheets” available in English only compound inaccurate understandings of how the Basij operates and what “membership” in the organization means.

28. In my opinion, it is highly unlikely that Mr. Ostadhassan was part of the *Basij-e danesh-ju*, or the University Basij. Each piece of his testimony leads me to conclude that he was only ever a part of the *Basij-e danesh amuz*, or the High School Basij. At his September 24,

Confidential—Subject to the Protective Order

2015 interview, Mr. Ostadhassan explained why his affiliation with the Basij ended after high school. He stated,

So how it worked was the Islamic Student Association and Basij in college, they were two groups against each other. The dynamics was like—because it was during President Khatami. Islamic Association they were, like, more liberal minded people, more reformist. And, and Basij was more like hardliners. So, I don't know, through time I found myself to be more into those ideas than Basij ideas. So it was the reason I joined Islamic Students Association.

DEF-00358660 at 59:28–1:00:06. The Islamic Student Association, sometimes called the Islamic Association of Students (in Persian, *anjoman-e islami daneshjuya*), has become the main vehicle on university campuses for student organizing in Iran to reform the regime. Since the 1990s, it has been a place for students who support reformists and the democratization of politics in Iran to meet each other and work together toward achieving reform. The students who join the Islamic Student Association are directly opposed to the Basij. Mr. Ostadhassan's choice to leave the Basij after high school and to join the Islamic Student Association at his university because he was drawn to its liberal, reformist ideas is extremely persuasive evidence that he was never a member of the University Basij.

29. Those who participate in the University Basij are typically awarded a shorter period of mandatory military service in return for their participation. But Mr. Ostadhassan has stated in a sworn affidavit that he “received no reduction in [his] military service requirement” as a result of his participation in the High School Basij because he “never became an active member of the main Basij” and never “participate[d] in the military exercises” required to receive the reduction. DEF-00422139. Further, Mr. Ostadhassan stated at his I-485 interview that he has not yet completed his mandatory military service and therefore has certain restrictions in his ability to enter and stay in Iran as a result. DEF-00358660 at 13:54–14:40. Mr. Ostadhassan's testimony is entirely consistent with my understanding of a person who has participated only in the High School Basij and not the University Basij. While the fact that Mr. Ostadhassan has not

Confidential—Subject to the Protective Order

yet completed his mandatory military service in Iran is not necessarily conclusive of whether he ever participated in anything other than the High School Basij, it is consistent with his representations to that effect. It would be very surprising to me if anyone affiliated with the University Basij, or more generally who supported the hardline regime, had chosen to leave his mandatory military service before it was complete, as Mr. Ostadhassan did.

30. From my review of deposition transcripts of USCIS officials in this litigation, I have concluded that USCIS officers are not provided training on specific country conditions, organizations or groups—including paramilitary groups—in countries like Iran. Without country-specific training about the Basij or other groups, I do not believe it is possible for a USCIS officer to accurately identify what relevance membership in such groups has for a determination of whether a person is a national security threat.

31. Mr. Emrich testified that USCIS officers are not provided training on specific country conditions, military or paramilitary organizations in particular countries, or specific country obligations regarding military conscription. Tr. of Emrich Dep. (Jan. 8, 2020) 139–41. From this testimony, I conclude that USCIS officers are not provided any training on the Basij or any paramilitary groups in Iran.

32. Mr. Heffron’s testimony corroborates Mr. Emrich’s testimony. Mr. Heffron testified that the only written policy document he could think of that guides USCIS officers on how to identify employment, training, or government affiliation indicators for national security concerns was a document he called “Attachment A,” identified in the deposition as “Exhibit 28.” See Tr. of Heffron Dep. (Dec. 12, 2019) 171–75. The section in Exhibit 28 containing guidance on identifying “Employment, Training, or Government Affiliations” states in full:

Certain types of employment, training, government affiliation, and/or behavior may (or may not) be indicators of a NS [national security] concern, depending on the circumstances of the case, and require additional scrutiny to determine whether a NS concern exists. For example, an individual may have been employed by a foreign government to engage in espionage or intelligence gathering, may have received training in such activities, or may have served as an

Confidential—Subject to the Protective Order

official or diplomat in a hostile foreign government. Officers may also need to consider proficiency in particular technical skills gained through formal education, training, employment, or military service, including foreign language or linguistic expertise, as well as knowledge of radio, cryptography, weapons, nuclear physics, chemistry, geology, pharmaceuticals, and computer systems.

DEF-00035040. The document does not refer to the Basij at all, and therefore cannot possibly provide any guidance for determining whether an applicant's prior affiliation with the Basij suggests he or she is a national security threat. *See id.* Mr. Heffron further testified that USCIS officers receive no training about whether religious charities, religious organizations, or religious activities have connections to terrorism. Tr. of Heffron Dep. (Dec. 12, 2019) 214–16, 266.

33. Therefore, it is my understanding that USCIS officers do not receive country-specific, well-informed training about the Basij that would be essential to accurately assess whether prior membership in a particular segment of the Basij in Iran is a valid indicator of a national security threat. It is clear to me that USCIS officers who adjudicate I-485 and naturalization applications are not familiar with or trained about the Basij and the way the Basij operates in Iranian society. In my opinion, it is highly concerning that USCIS bases such important decisions as the adjudication of immigration benefit applications on reasonable differences in translations between Persian and English and against the backdrop of general ignorance about the Basij and Iranian society generally.

34. Mr. Heffron also testified that USCIS does not provide officers who handle cases that are processed through the Controlled Application Review and Resolution Process (CARRP) with any training on bias, discrimination, Islam, Islamophobia, or not improperly equating national security concerns with lawful activity. Tr. of Heffron Dep. (Dec. 12, 2019) 264–66. Mr. Emrich similarly testified that USCIS officers do not receive any training on anti-discrimination (aside from “cultural awareness training” to “remind officers that adjudication benefits based [on] any discriminatory reason is illegal”), racial profiling, religious profiling, religious practices, cultural practices, or Islam. Tr. of Emrich Dep. (Jan. 8, 2020) 136-139.

Confidential—Subject to the Protective Order

35. Without specific trainings for USCIS adjudicators regarding implicit bias, discrimination, Islam, Islamophobia, religious activities, and other related topics, I believe it is very likely that officers were not properly equipped with the culturally informed and nuanced understanding necessary to fairly and accurately assess whether Mr. Ostadhassan's biography contained valid indicators of national security threats.

36. USCIS specifically instructs USCIS officers to consider as a non-statutory indicator of a national security concern any "proficiency in particular technical skills gained through formal education, . . . including . . . nuclear physics, chemistry, biology, pharmaceuticals, and computer systems." DEF-00035040. Such a vetting system is unreasonably overbroad, particularly when combined with already-existing systemic and individual biases against immigrants from the Middle East. Such a system is bound to sweep up an untold number of persons whose activities or affiliations are perfectly consistent with innocent activity.

37. It is very possible that without training to curb or check certain biases, Mr. Ostadhassan's identity as a Muslim from Iran with rigorous training in petroleum engineering triggered in the officers adjudicating his application certain biases (reflected in United States society more broadly) which have flourished especially since 9/11, including around the Iranian government's efforts to build up its nuclear capabilities. It is also very possible that such biases affected the officers' assessment of Mr. Ostadhassan's past and current associations, even though all of Mr. Ostadhassan's activities and academic interests are also wholly consistent with innocent activities.

38. Understanding the significance of a person's former affiliation with the Basij on a national security determination requires culturally informed training on the Iranian educational system, Iranian society, and the Basij. In light of the complete lack of such training, it is my opinion that it would be easy for a USCIS adjudicator to misunderstand Mr. Ostadhassan's written and oral statements and erroneously conclude that his prior affiliation with the Basij while a minor could make him a potential national security threat to the United States.

Confidential—Subject to the Protective Order

39. From my review of Mr. Ostadhassan's A-File, T-File, and September 24, 2015 green card interview for his amended first I-485 application, I believe it is highly likely that Mr. Ostadhassan was only ever a member of the *Basij-e danesh-amuz*, or High School Basij. As discussed, this is not an unusual connection to have in Iran, nor does it in any way reveal a person's political beliefs, including whether somebody supports or is against the Iranian regime. In the course of conducting research in Iran, I met many high school students who come from anti-regime families in Iran but who became members of their high school Basij organization to be able to participate in field trips or other school activities. Therefore, it is unreasonable and inaccurate for a USCIS officer to rely on any applicant's affiliation with the High School Basij as evidence that the applicant might pose a national security threat to the United States.

Background on the Basij

40. Today, outsiders often understand the Basij to be a large voluntary paramilitary organization which actively supports the Iranian regime. In reality, however, the Basij is a complex and multifaceted organization that defies simple characterization. There are Basij organizations in virtually all cities and localities in Iran, and the activities and political beliefs of their members vary greatly. There are Basij organizations for certain professions, such as health care workers who provide services to Iranians living in rural areas, and Basij organizations in schools ranging from elementary school grades (in some cities) all the way through university. Some members are true believers in the regime and highly active in the organization, while others are merely non-active, card-carrying members who may even oppose the regime but nevertheless join for a variety of reasons. In some contexts, especially in high school, joining the Basij is often mandatory for participation in everyday student activities, such as participating in school trips or clubs, applying for university, or applying for a job.

41. The Basij was launched in 1980 by Ayatollah Khomeini as a volunteer paramilitary group in the service of the war effort. In 1981, the *Basij-e Mostaz'afin* (literally the "Mobilization of the Oppressed") became a unit of the Revolutionary Guard (*vahed-e basij-e mostazafan-e sepah-e pasdaran*). The emphasis of this voluntary "mobilization of the

Confidential—Subject to the Protective Order

oppressed” echoed the class-based revolutionary slogans of the 1977–79 revolutionary period. Ayatollah Khomeini came to power in Iran on a platform of creating a country that served the *mostazafin* (the oppressed, which for him also included the *bazaari* merchant class). Ervand Abrahamian, *Khomeinism: Essays on the Islamic Republic* 17 (1993) (attached as **Exhibit C**). In mosques and schools throughout the country, hundreds of thousands of men and women joined the Basij and received training in the use of weapons. The Basij became the main channel to recruit legions of volunteers to the warfront. In general, Basij volunteers were deployed from 45 days to three months before they received a break from the front. Some Basijis (the term used to describe members of the Basij) renewed their deployment instead of taking leave, thus prolonging their service at the front. Anyone could volunteer to become a Basiji: young, old, man, woman; the women supported the war effort from behind the frontline as nurses and volunteers who made food and warm clothes for the soldiers. Men as old as 70 years old volunteered at the front with the Basij, and although the legal age to fight was 16, younger boys often forged their parents’ signatures and were deployed to the warfront.

42. During the war (which lasted from 1980 to 1988), Basiji deployed to the front could make a formal request at a command center to become a member of the Revolutionary Guard. The process to become a Guard was difficult and involved thorough background tests, including investigation of neighbors and interviews about the applicant’s family, their politics, and their level of religiosity. Only after undergoing a lengthy investigative period could a Basiji with the right religious and revolutionary credentials become a member of the Revolutionary Guard. The Guard, as a more professionalized military force, received salaries of 70,000–80,000 rial per month (\$777–\$888 USD), compared to 20,000–24,000 rial per month for members of the Basij (\$222–\$266 USD) (calculated using 1986 USD-to-rial conversion rates published by the U.S. Government Department of Treasury, Treasury Reporting Rates of Exchange as of March 31, 1986).

43. In the initial post-war period, the purpose of the Basij shifted. The Basij began aiding the regime in the moral policing of the population. They reprimanded women for not

Confidential—Subject to the Protective Order

covering themselves properly. They stood at street checkpoints to monitor for “indecent” music, behavior, and anything else that the regime deemed immoral at the time. Following the death of Ayatollah Khomeini in 1989, the new Supreme Leader, Ali Khamenei, made the Basij one of the five main divisions of the Revolutionary Guard and shifted its mission to a force responsible for the internal security of the state.

44. In post-war Iran (that is, post-1988), Basij members were divided into three groups: 1) regular members, 2) active members, and 3) special members, in order of least to most involved.

45. First, regular Basijis are those who join, obtain a Basij card, and pass basic training. These members have little to no connection with active or special members. Some of the members whom I interviewed for my academic research became regular Basij members because they felt that doing so would allow them to scale the social ladder, by helping them get into college or land a job. Some, especially those in high school (both boys and girls), had to join in order to go on certain field trips. They enrolled to receive the Basij card, but then did not partake in any Basij activities once their field trip was over.

46. Second, Active Basij members are regular members who have engaged in at least six months of continued activity and passed complementary training. *See generally* Saeid Golkar, *The Ideological-Political Training of Iran’s Basij*, Middle East Brief, No. 44, September 2010, available at <https://www.brandeis.edu/crown/publications/middle-east-briefs/pdfs/1-100/meb44.pdf>.

47. Finally, the third group, the Special Basij members, are those who have undergone military and ideological training and are technically members of the Revolutionary Guard. These Special Basij members are core members of the Basij organization and serve the Revolutionary Guard full time. They receive a salary for their work.

48. In 1997, over half of the Revolutionary Guard and Basij voted for reformist Mohammad Khatami in that year’s presidential elections. Supreme Leader Khamenei saw this vote for reform in such large numbers as a direct threat to his rule, and began to implement

Confidential—Subject to the Protective Order

drastic changes to the Basij. The Supreme Leader’s Office, along with more conservative members of the Revolutionary Guard and Basij, intensified the training programs, especially for its younger active members, in an attempt to create a more loyal cadre of supporters within the regime’s armed forces which would not seek to reform the system. (To be clear, Mr. Ostadhassan’s testimony leads me to conclude that he was never one of those “younger active members” but instead merely a card-carrying “regular” member.) Also at this time, new ideological classes were added to the Basij training programs. Classes included *velayat* (guardianship) in 1997, *basirat* (insight) in 1998, and *marefat* (awareness) in 2001. *See generally* Golkar, *supra*. These new policies represented an intense effort in training and education about the Islamic Republic and Islamic society, in accordance with the Supreme Leader’s interpretations.

49. Khamenei’s goal was to create a stable voting bloc for more hardline candidates and to avoid landslide victories of reformists like the one that had taken place in 1997. These foundational changes are one of the main reasons that Basijis born in the 1990s or later tend to be more hardline than members of the Basij who were born in earlier generations. For instance, in 2009 the regime mobilized younger Basijis to suppress the Green Movement (which arose out of anger over perceived voter fraud in the 2009 presidential election and resulted in the largest national protests in Iran since the 1979 revolution) and to “cleanse” the ranks of the IRGC by purging its reformist members. As these events reflect, the Basij since 2009—well after Mr. Ostadhassan ceased to be a member—is in many ways a more extreme incarnation than iterations of the Basij in the past.

50. At the same time, it is important to note that the Basij is highly varied based on where it is located. Basij organizations in smaller towns and provinces often play a variety of civic roles, including health classes and medical treatment. For instance, there is a Basij Medical Doctor’s organization that specializes in medical care in areas of the country where access to doctors may be difficult, or where access to specialized care costs too much money for patients.

Confidential—Subject to the Protective Order

There are large networks of Basij who work exclusively on cultural issues and are involved in filmmaking, writing books, producing public events, and other non-military activities.

51. Despite Khamenei's attempted institutionalization of the Basij in the post-war period, in reality the Basij continues to have a loose structure on the ground. Basijis themselves have a difficult time defining their exact role, and within their ranks I found great discord. The only Basij branch that tends to be unified is the university Basij organizations. Otherwise, the current Basij members who serve outside of the university sphere—*e.g.*, in offices, factories, and neighborhoods—are often unsure of their exact role. Most revealed to me that they had joined to take a step up on the social ladder, or to keep their jobs; or if they were still in high school, to go on field trips and join extracurricular activities.

Prior Testimony

52. I have not testified as an expert at trial or by deposition in any case in the previous 4 years.

Compensation

53. I am not receiving any compensation for my services as an expert witness in this case. I have agreed to serve as an expert on a pro bono basis for all work in this matter, including deposition and trial testimony. I will be reimbursed for all reasonable expenses incurred in the course of my work on this case, if any, such as travel expenses, including the actual costs of transportation, meals, and lodging.

Publications

54. For a list of my publications in the preceding 10 years, please see my attached curriculum vitae (attached as **Exhibit A**).

I declare under penalty of perjury that the foregoing is true and correct. Executed this
28th day of February 2020 in Washington, DC.


DR. NARGES BAIQHLI

Exhibit A (attached): Curriculum vitae

Exhibit B (attached): List of documents reviewed

Exhibit C (attached): Excerpt from Ervand Abrahamian, *Khomeinism: Essays on the Islamic Republic* 17 (1993)

Exhibit A

NARGES BAJOGHLI

Curriculum Vitae

School of Advanced International Studies
Johns Hopkins University
1717 Massachusetts Ave, Washington, DC NW 20036

Email: narges.bajoghli@jhu.edu
Web: www.nargesbajoghli.com
Ph: (703) 362-7003

PROFESSIONAL APPOINTMENTS

- 2018-Present Assistant Professor of Middle East Studies, School of Advanced International Studies, Johns Hopkins University
- 2016-18 Postdoctoral Research Associate in International and Public Affairs, The Watson Institute, and Affiliated Fellow at the Humanitarian Innovation Initiative, Brown University

EDUCATION

- Ph.D. Department of Anthropology, New York University, 2016
Dissertation: *Paramilitary Media: Revolution, War, and the Making of the Islamic Republic of Iran*
- Graduate Certificate Program in Culture and Media, 2014
Documentary Film: *The Skin That Burns* (24mins). Distributed by Film Media Group
- MPhil Department of Anthropology, New York University, 2013
- M.A. Department of Anthropology, New York University, 2012
- M.A. School of Social Sciences, The University of Chicago, 2008
- B.A. International Relations and Middle East Studies, Wellesley College, Wellesley MA, 2004

FELLOWSHIPS

- 2016-18 Postdoctoral Research Associate in International and Public Affairs, The Watson Institute, Brown University
- 2016-18 Affiliated Fellow, Humanitarian Innovation Initiative, Brown University
- 2015-16 Fellow, The Center for Humanities, NYU
- 2015-16 Dean's Dissertation Fellowship, NYU
- 2009-15 MacCracken Graduate Fellowship, NYU
- 2009-10 Alice Palmer Fellowship for Graduate Studies, Wellesley College

RESEARCH GRANTS

- 2019-21 Discovery Award, Johns Hopkins University
- 2013-14 Social Science Research Council: International Dissertation Research Fellowship
- 2013-14 National Science Foundation: Doctoral Dissertation Improvement Grant: Awarded/Declined
- 2013-14 The Wenner Gren Foundation for Anthropological Research: Dissertation Fieldwork Grant
- 2013-14 American Institute of Iranian Studies: Pre-Doctoral Dissertation Fellowship
- 2013-14 Torch Prize Fellowship, Graduate School of Arts and Sciences, NYU

AWARDS

- 2016-17 Dean's Outstanding Dissertation Award in the Social Sciences, NYU

PUBLICATIONS

Book

- 2019 *Iran Reframed: Anxieties of Power in the Islamic Republic*, Stanford University Press

Peer-Reviewed Journal Articles

- 2020 "The Researcher as National Security Threat: Surveillance, Agency, and Entanglement in Iran and the United States." *Comparative Journal of South Asia, Africa, and the Middle East* 39(3).
- 2017 "*The Outcasts: The Start of 'New Entertainment' in Pro-Regime Filmmaking in the Islamic Republic of Iran.*" *Middle East Critique* 26(1).

Book Chapters

- 2016 "Iran and the Arab Spring," with Arang Keshavarzian in *The Arab Spring: Change and Resistance, 2nd Edition*. David W. Lesch and Mark L. Haas, eds. Westview Press.
- 2014 "Digital Technology as Surveillance: The Green Movement in Iran" in *Wired Citizenship: Youth Learning and Activism in the Middle East*, Linda Herrera, ed. Routledge Press.

Documentary Films

- 2015 Director and Editor, *Coming to America: The Cyrus Cylinder*, part of *7 Sides of a Cylinder Film*.

- 2014 Director and Editor, *The Skin That Burns* (25mins). Distributed by Film Media Group. Documentary on Iran's volunteer soldiers who were exposed to chemical warfare during Iran-Iraq War (1980-1988). For the Graduate Program in Culture and Media.

Book Reviews

- 2018 "Prozak Diaries: Psychiatry and Generational Memory in Iran" in *Anthropological Quarterly* 91(1).
- 2016 "Captive Society: The Basij Militia and Social Control in Iran" in *International Journal of Middle East Studies* (IJMES) 48(3).
- 2016 Review Essay: "Media in Iran: From the 1979 Revolution to the Green Movement." *Review of Middle East Studies* 50(1): 1-5.

SCHOLARLY CONFERENCES

Conferences and Symposia Organized

- 2017 *Middle East Toxic Wars*, Brown University Engaged Scholarship Conference, Providence, November 10.
- 2015-16 *Animating the Archives: A Series of Symposia on Iranian Cultural History*, Series of Symposia, New York University: www.iranarchives.org.
- 2012 Fifth International Conference on the Iranian Diaspora, UCLA, October 13-14.
- 2010 Inside/Outside/Offside: The Role of Ideology and Citizenship in Iran from the 1979 Revolution to the 2009 Green Movement, UCLA, October 9.
- 2006 Bam and Beyond Seminar Part 2, Tehran, Iran, January 21.
- 2005 Bam and Beyond Seminar Part 1, Columbia University, November 6.
- 2004 First International Conference on the Iranian Diaspora, Tufts University, April 11-12.

Panels Organized

- 2019 "Competing for Attention: The Life of the State in the Digital Age," American Anthropological Association Annual Conference, Vancouver, British Columbia, November 20-25.
- 2019 "Islamic Media and Political Futures," Middle East Studies Association Annual Conference, New Orleans, LA, November 14-17.
- 2016 "Evidence in National Security Contexts," American Anthropological Association Annual Conference, Minneapolis, MN, November 16-20.
- 2015 "The Politics of 'Moderate Islam' Beyond U.S. Empire," American Anthropological

Association Annual Conference, Denver, CO, November 18-22.

2013 “Religion, Media, and Politics in the Middle East: An Anthropological Perspective,” Middle East Studies Association Annual Conference, New Orleans, LA, October 10-13.

Conference Papers

2019 “The Digital War: The Islamic Revolutionary Guard Corps of Iran’s Media Production at Home and Abroad,” American Anthropological Association Annual Conference, Vancouver, British Columbia, November 20-25.

2019 “Iranian Regime Media: Islam, Nationalism, and Political Control” Middle East Studies Association Annual Conference, New Orleans, November 14-17.

2016 “Research with Iran's Revolutionary Guard Corps and Basij Paramilitary Organization: Negotiating Access, Gathering Evidence, and Attempting Distance,” American Anthropological Association Annual Conference, Minneapolis, MN, November 16-20.

2016 “Transmitting the Revolution: An In-Depth Look at Pro-Regime Cultural Centers and Cultural Activists in Iran,” Surveying Iran Conference, Central European University and University of Pennsylvania, Budapest, Hungary, September 1-2.

2016 “Research with Iran's Revolutionary Guard Corps and Basij Paramilitary Organization: Negotiating Access, Questioning Collaboration, and Attempting Distance,” Society for Cultural Anthropology, Ithaca, NY, May 12-14.

2015 “Creating Moderate Shi’a Heroes for Youth in Iran,” American Anthropological Association Annual Conference, Denver, CO, November 18-22.

2014 “Vaccinating Society’: Soft War Politics in the Islamic Republic's Media World,” Middle East Studies Association Annual Conference, Washington, DC, November 22-25.

2012 “Anthropology and Social Change,” organized by Emily Martin and Katherine McCaffery, American Ethnological Society Annual Conference, New York, April 21.

2011a “Censors and Cultural Producers: The Basij and Revolutionary Guards as Media Makers,” Conference: Cinema in Iran: Circulation, Censorship, and Cultural Production. Iran Media Project of Annenberg School for Communication at University of Pennsylvania. Presented in Berlin, Germany, December 15-17.

2011b “Chemical Warfare, Invisible Traces, and Photographed Pain: Evidence from the Iran-Iraq War,” in Unsettling Accounts: Photographs, Traces, and Evidence Panel, American Anthropological Association Annual Conference, Montreal, Canada, November 16-20.

2008a “The Outcasts: Reforming the Internal ‘Other’ by Returning to the Ideals of the Revolution,” Middle East History and Theory Conference (MEHAT), The University of Chicago, May.

2008b “The Outcasts: Reforming the Internal ‘Other’ by Returning to the Ideals of the Revolution,” Visual Representations of Iran Conference, St. Andrews University, Scotland, June.

2008c “The Outcasts: Reforming the Internal ‘Other’ by Returning to the Ideals of the Revolution,”

Middle East Studies Association (MESA) Conference, Washington, DC, November.

INVITED TALKS

- 2019 “The Production of Revolutionary Media,” Johns Hopkins University, February 19.
- 2019 “Iran, A Revolution at Forty,” University of Washington, January 28.
- 2017 “The Politics of Counting,” Princeton University, NJ, April 4.
- 2016 “Pro-regime Media in Revolutionary Iran,” Boston University, MA, November 3.
- 2016 “Anxieties of Power,” Oklahoma State University, OK, November 10.
- 2016 “Iran after the Nuclear Deal,” San Jose State University, CA, October 21.
- 2015 “Battling Truths: Defending the Islamic Republic of Iran’s Sacred Memories in Film and Literature,” Iranian Studies Initiative, New York University, NY, February 19.
- 2014 “Islamic Media: Technology and the Sacred,” Duke University, NC, February 6-7.
- 2013 “Social History of Iranian Cinema” Workshop, Northwestern University, IL, February 8.
- 2012 “The Green Revolution and Beyond: Religion, The Internet, and Politics in Iran,” Digital Religion: Knowledge, Politics, and Practice Conference at NYU’s Center for Religion and Media, NY, February 17.

BOOK TALKS

- 2020 Seminary Coop (University of Chicago)
- 2020 New York University
- 2020 George Mason University
- 2020 Stanford University
- 2020 San Francisco State University
- 2020 Penn State
- 2020 University of Michigan
- 2020 UCLA
- 2020 Brown University
- 2020 George Washington University
- 2019 University of Nebraska (Omaha and Lincoln)
- 2019 Tufts University
- 2019 American University of Beirut
- 2019 University of Arizona
- 2019 Princeton University
- 2019 Johns Hopkins University, SAIS
- 2019 Boston College
- 2019 Boston University
- 2019 Massachusetts Institute of Technology
- 2019 Yale University

FILM SCREENINGS

* Indicates a Q/A or a talk

The Skin That Burns

2019 University of Washington*
2017 University of Pennsylvania*
2015 Society for Visual Anthropology Film Festival
2014 Naval Postgraduate School
2013 Ohio State University
2013 Noor Iranian Film Festival
2013 Princeton University*
2013 Peace on Earth Film Festival
2013 Columbia University School of Journalism*
2013 Hagop Kevorkian Center for Near Eastern Studies, NYU*
2013 Jaipur Film Festival
2012 Cantor Film Center, New York, NY*
2012 University of California, Irvine*
2012 Hiroshima, Japan
2012 The Hague, Netherlands
2012 Tehran Peace Museum, Tehran, Iran

TEACHING EXPERIENCE

Johns Hopkins University, Sole Instructor

Spring 2020 Ethnographic Research Methods (Graduate level course)
Fall 2019 Iran a Revolution at 40 (Graduate level course)
Fall 2019 Media Wars (Graduate level course)
Spring 2019 Iran a Revolution at 40 (Graduate level course)
Fall 2018 Media and the Middle East (Graduate level course)

Brown University, Sole Instructor

Fall 2016 Middle East: Media Wars (Upper-Level Undergraduate course)
Spring 2018 Middle East: Media Wars (Upper-Level Undergraduate course)

New York University, Teaching Assistant

Video Production, Graduate Course (Fall 2015-Spring 2016; Fall 2014-Spring 2015)
Introduction to Anthropology (Fall 2012; Fall 2011)
Anthropology of Language (Spring 2012)

Certificate: Preparing Future Faculty: Achieving Success Through Communication, Spring 2015

ACADEMIC SERVICE

Professional

2019 Contributor, Book Forum, *Cultural Anthropology*
2019 Reviewer, *Visual Anthropology Review*
2018 Reviewer, *Public Culture*
2017 Reviewer, *American Anthropologist*
2016 Reviewer, *International Journal of Conflict Management*
2016 Reviewer, *Middle East Critique*

2015 Reviewer, *British Journal of Middle East Studies*
2015 Reviewer, *Medicine Anthropology Theory*
2014-15 Association of Middle East Anthropology, Steering Committee for Conference Panel Planning
2012-14 Contributing Editor, *Cultural Anthropology Journal*
2011-13 Director, Outreach and Public Relations, *Anthropology Now Journal*
2011 Founder, Iranian Studies Graduate Students Association

New York University

2011-15 Steering Committee, Speaker Series, Iranian Studies Initiative, NYU
2014 Graduate Student Member, Faculty of Arts and Sciences Committee on Discipline
2012 Organizer, Radical Ethnography Study Group, NYU
2010 Steering Committee, Anthropology Graduate Students Association

Selected Media Publications and Appearances

2020

“Suleimani’s Death Changes Nothing for Iran” *New York Times*

“Soleimani’s Death Could Galvanize Shia Coalitions Against One ‘Foreign Aggressor’—The U.S.” *Democracy Now!*

“What killing of Iranian general means for US, nuclear deal” PBS Newshour

2019

“Iran’s IRGC” on CNN

“Trump’s Iran Strategy Will Fail. Here’s Why” *New York Times*

“Hidden Sources of Iranian Strength” *Foreign Policy*

“Iran’s Other Generation Gap, 40 Years On” *Foreign Affairs*

“The Islamic Republic at 40: What does the future hold for Iran?” invited guest on *AJ Stream*

2018

“Did a Terrorist Attack Just Save the Iranian Regime?” *Foreign Policy*.

“From rhetoric to reality: The return of US sanctions on Iran” invited guest on *The Listening Post, Al Jazeera*

“Iran Will Never Trust America Again.” *Foreign Policy*.

“Behind the Iran Protests.” *Jacobin*.

“A London Television Station Has Convinced Iran the Shah was Great.” *Foreign Policy*.

2017

“IRGC Media Producers Open New Front Against Rouhani.” *Al Monitor*.

“The Genesis of a New Iranian Nationalism.” *Al Monitor*.

“Syria Chemical Attack Unsettles Iran’s Chemical Weapons Survivors.” *Al Monitor*.

Story in the Public Square, The Pell Center, May 12, 2017:

https://www.youtube.com/watch?v=270niN_Bq0g

FoxNews, Dan Yorke State of Mind: “Chemical warfare expert discusses trade, uses, and effects post-Syria attack,” April 17, 2017: <http://foxprovidence.com/2017/04/17/417-chemical-warfare-expert-discusses-trade-uses-and-effects-post-syria-attack-on-state-of-mind/>

BBC WorldService NewsHour: “The Lasting Impact of a Chemical Attack,” April 10, 2017.

2016

“Tipsy in Tehran.” *The New York Times Magazine*.

“Learning to Play by Ear in Iran.” *The New York Times Magazine*.

PBS NewsHour: “Enforcing Iran sanctions still tangles Iranian-Americans in ‘spider’s web of laws’” February 27, 2016: <http://www.pbs.org/newshour/bb/enforcing-iran-sanctions-still-tangles-iranian-americans-in-spiders-web-of-laws/>

“The IRGC's Plans to Win Hearts and Minds.” *Al Monitor*.

“How Women, the Green Movement, and an app Shaped Iran's Election.” *The Washington Post*.

“Women Win Big in Iran's Parliamentary Elections.” *Al Monitor*.

“Towards an Archive of the Basij: Memories from Iran’s Volunteer Militia.” *Ajam Media Collective*

2015

“How Iran is Trying to Win Back the Youth.” *The Guardian*.

“Iranian Vets Also Push for Nuclear Deal.” *LobeLog*.

“Why Iran's Revolutionary Guard Supports the Deal.” *LobeLog*.

“Iran’s Unfair Nationality Laws.” *Middle East Research and Information (MERIP)*.

2014

Adviser, CNN, *Anthony Bourdain Parts Unknown: Iran*.

“Debating the Iran-Iraq War on Film.” *Middle East Research and Information Project*, 271.

2013

Op-Ed “US-Iran Nuclear Deal Should Open Up Academic Exchanges As Well.” *The Guardian*.

Guest on *DemocracyNow!* with Amy Goodman and Nermeen Shaikh: Obama and Rouhani Welcome New Talks, Offering Hope to Iranians Suffering Under U.S.-Led Sanctions.

Op-Ed: "President Rouhani's Overtures to the West are Genuine. Iran Voted for Change." *The Guardian*.

"Iran's Chemical Weapons Survivors Show Twin Horrors of WMD and Sanctions." *The Guardian*.

2012

"Principled Defiance." Interview with Shirin Neshat. *Bespoke Magazine*.

"Blisters and Sanctions." *Middle East Research and Information Project*. (<http://www.merip.org/blisters-sanctions>). (with Shahriar Khateri).

"Missed Opportunities: A Review of Arab Media." *The Revealer*. (<http://therevealer.org/archives/11895>)

"Iranian Cyber-Struggles." *Middle East Research and Information Project* (<http://www.merip.org/mero/mero050312>)

"Engaging the Public: Shirley Lindenbaum and Anthropology Now." *Anthropology News*. (<http://www.anthropology-news.org/index.php/2012/04/02/engaging-the-public/>)

"OWS, Anthropology, and New York City Student Engagement." *Anthropology News*, (<http://www.anthropology-news.org/index.php/2012/01/10/january-aes-news/>) (with Natasha Raheja)

2011

PBS Frontline: "Empowering Iranian American Youth: The Camp Ayandeh Story – A Conversation with Co-Founder Narges Bajoghli" by Arash Karami, August 14, 2011: <http://www.pbs.org/wgbh/pages/frontline/tehranbureau/2011/08/empowering-iranian-american-youth-the-camp-ayandeh-story.html>

Wellesley Magazine: "After the Revolution: Spotlight on Alum, Narges Bajoghli" by Marcy Barack Black, Spring 2011.

2009

"Devouring Their Own: The Basij in the Islamic Republic." *Huffington Post*.

2005

Researcher and Sound Director, *Red Lines and Deadlines*, PBS Documentary

RELEVANT PROFESSIONAL EXPERIENCE

2009-13 Director, Oral History Project of Survivors of Chemical Warfare, Tehran Peace Museum

2003-12 Co-Founder Iranian Alliances Across Borders (a 501c3 non-profit organization)
Chair, Board of Advisors, Iranian Alliances Across Borders

2002-06 Executive Director, Iranian Alliances Across Borders
Raised over \$500,000 through grants. Recruited and managed staff of 25. Curator of TRANSFORM/NATION: Contemporary Art of Iran and its Diaspora, sister-exhibitions in

Washington, DC and Tehran (Summer 2007) with supplemental academic talks in both cities.

LANGUAGES

Fluent in Persian and Spanish

PROFESSIONAL MEMBERSHIPS

American Anthropological Association

Middle East Studies Association

Association for Iranian Studies

Exhibit B

List of Documents Reviewed

1. DEF-00358660
2. DEF-00358661
3. DEF-00399255
4. DEF-00422120
5. DEF-00427012
6. Transcript of Heffron, Christopher Deposition (Dec. 12, 2019) and exhibits
7. Transcript of Emrich, Matthew Deposition (Jan. 8, 2020) and exhibits
8. Transcript of Lang, Amy Deposition (Jan. 30, 2020) and exhibits

Exhibit C

KHOMENISM

O N T H E
I S L A M I C
R E P U B L I C



ERVAND ABRAHAMIAN

Khomeinism

*Essays on the
Islamic Republic*

Ervand Abrahamian

UNIVERSITY OF CALIFORNIA PRESS
BERKELEY LOS ANGELES LONDON

free of all state intervention, especially of the cumbersome judicial-review process.⁶ After the revolution, however, he found it expedient to retain a centralized judicial structure, including an elaborate review process, both to provide some semblance of uniformity and to retain ultimate control over local judges.⁷ In fact, the new constitution guaranteed citizens the right of judicial appeal.

Sixth, if fundamentalism means a dogmatic adherence to tradition and a rejection of modern society, then Khomeini does not qualify. He frequently stressed that Muslims needed to import such essentials as technology, industrial plants, and modern civilization (*tamaddon-e jadid*). His closest disciples often mocked the “traditionalists” (*sunhati*) for being “old-fashioned” (*kohaniperast*). They accused them of obsessing over ritual purity; preventing their daughters from going to school; insisting that young girls should always be veiled, even when no men were present; denouncing such intellectual pursuits as art, music, and chess-playing; and, worst of all, refusing to take advantage of newspapers, electricity, cars, airplanes, telephones, radios, and televisions.⁸ In the words of Hojjat al-Islam Mohammad Javad Hojjati-Kermani, another Khomeini disciple: “These traditionalists should be labeled reactionary [*ertejayi*] for they want us to return to the age of the donkey. What we need is not the worship of the past but a genuine *renasans* [literal transliteration of the word ‘Renaissance’].”⁹ The concepts, not to mention the terminology, make mockery of the Orientalist claim that Khomeinism is merely another recurrence of the old traditionalist “epidemic” that has plagued Islam from its very early days.¹⁰

Seventh, the term “fundamentalism,” because of its origins in early twentieth-century American Protestantism, has distinct conservative political connotations. American fundamentalists, reacting against contemporary “social gospel” preachers, argued that the goal of true religion was not to change society but to “save souls” by preserving the literal interpretation of the Bible—especially on such doctrinal issues as Creation, Judgment Day, and the Virgin Birth. Khomeinism, in contrast, while by no means oblivious to doctrinal matters, is predominantly and primarily concerned with sociopolitical issues—with revolution against the

alist elite, expulsion of the Western imperialists, and mobilization of what it terms the *mostazafin* (oppressed) against the *mostakberin* (oppressors). In fact, Khomeini succeeded in gaining power mainly because his public pronouncements carefully avoided esoteric doctrinal issues. Instead, they hammered away at the regime on its most visible political, social, and economic shortcomings.

Finally, the term "fundamentalist" conjures up the image of inflexible orthodoxy, strict adherence to tradition, and rejection of intellectual novelty, especially from outside. In the political arena, however, Khomeini, despite his own denials, was highly flexible, remarkably innovative, and cavalier toward hallowed traditions. He is important precisely because he discarded many Shii concepts and borrowed ideas, words, and slogans from the non-Muslim world. In doing so, he formulated a brand-new Shii interpretation of state and society. The final product has less in common with conventional fundamentalism than with Third World populism, especially in Latin America.

The term "populism" needs some elaboration. By it I mean a movement of the propertied middle class that mobilizes the lower classes, especially the urban poor, with radical rhetoric directed against imperialism, foreign capitalism, and the political establishment. In mobilizing the "common people," populist movements use charismatic figures and symbols, imagery, and language that have potent value in the mass culture. Populist movements promise to drastically raise the standard of living and make the country fully independent of outside powers. Even more important, in attacking the status quo with radical rhetoric, they intentionally stop short of threatening the petty bourgeoisie and the whole principle of private property. Populist movements, thus, inevitably emphasize the importance, not of economic-social revolution, but of cultural, national, and political reconstruction.

*
key

Khomeini's View of the State

Throughout the Middle Ages the Shii clergy, unlike their Sunni counterparts, failed to develop a consistent theory of the state. The Sunnis, recognizing the Umayyad and Abbasid caliphs as the