

## **Fourth Session of Court Proceedings of a Group of Accused in the Velvet Coup**

### **Complete Text of the General Indictment of a Group of Accused in the Velvet Coup**

In the Name of the Almighty

*‘And when it is said to them: Do not make mischief on earth, they say: Verily we are in fact peacemakers. Is it not that they themselves are the mischief-makers? But they do not perceive.’*

Surih Baqarah, Verse 11

Text of the indictment issued by Tehran’s Prosecutor on behalf of a number of the conspirators and instigators of the recent unrest

Respected Head of Branch 15 of the Islamic Revolutionary Court of Tehran,

Greetings;

As you are well aware, the glorious and historic epic of 22 Khordad [June 12], characterized by the record participation of 40 million intelligent and insightful Iranians who took part in the political sphere to determine the fate of the nation in the international arena, was an awe-inspiring and everlasting glory for the people of Iran.

The passionate participation of the nation [in the elections], subsequent to [a period of] extensive and exciting campaigns, [that occurred] in complete peace and without any security concerns, was a great achievement for the people of Iran. [It] signified the stability and high level of security of the Islamic Republic of Iran, and was to pave the way for an economic boom and attract potential investors to the country.

Yet another significant achievement of this vast participation was that it discouraged and eliminated the enemy’s military threats, and caused them to abandon any plans for a military strike against a government that has the endorsement of 85% of its nation’s electorate.

This election considerably and significantly elevated the status of the Islamic Republic in the political sphere and enhanced its presence and participation in international dialogue and discourse.

Regretfully, however, despite the will of 40 million brave Iranians who eagerly anticipated reaping the sweet fruits of such glorious vast participation, we witnessed a power-mongering and perverted force openly confronting the regime and challenging the nation’s majority vote. Some of these defeated political groups, assisted by hostile western media and the embassies of aggressor nations, created chaos and confusion. And, by taking advantage of the sympathy and passion of opportunistic supporters of some of the defeated candidates, shattered that which was achieved by the people; in so doing, they defiled the national pride, and the glorious and epic participation of the people became the dartboard of allegations of the hegemonic rulers.

Some might entertain thoughts that these events were a natural emotional reaction to the results of the elections, and that a group of passionate supporters took to streets with no prior planning, and were simply moved by their own sentiments.

The majority of those who rallied the streets on the first two to three days of the election and engaged in illegal actions, had no other intention but to challenge the results of the election. Their behavior was merely an emotional reaction to the results of the election. Investigations, however show, without a doubt, the culpability of groups that plotted and instigated these events and gave impetus to destructive henchmen. [These henchmen] took advantage of every opposition gathering to create fear, terror and chaos and disrupt the security of the city. [This culpability] is distinctly separate from those who had been simply disillusioned. That is to say that there is a distinction between the objectives of those who designed the riots with the intention to destroy, and those who had made an error—who, once the issue became clear and it was proven that the allegations of fraud in the election was false, immediately removed themselves from these scenes.

The claim that the intention of the conspirators of unrest and instigators of destruction is separate from the aim of those who simply made a mistake is not merely a hypothesis. Rather, it is based on analysis and investigations that confirms beyond doubt that the intention of the architects of these conspiracies exceeded the issue of the election, and that they [the conspirators] were actively plotting a soft coup against the regime by taking advantage of the heightened atmosphere of competition during the election.

In searching for the root cause of these bitter events which came about as a rumor of fraud and suspiciously flourished alongside the elections, we observe signs that takes us back almost a year prior to the election. These rumors, which became the stepping stone of the recent chaos, plus the reports from reliable sources, and admissions made by the accused—are fully documented and can be presented to the court, confirming this claim.

Despite warnings given by the regime's high ranking authorities to some political parties, such as the Participation Front Party, Mojahedin-e Enghelab Organization, and Kargozaran, they continued their actions—notwithstanding the fact that everyone knows that due to the legal and public checks and balances there are no possibilities for fraud. In order to institutionalize the rumours and make them believable, the said groups founded a committee, called 'the Committee to Preserve the Votes,' to spread rumours of election fraud. A number of individuals associated with this committee had no hesitations even to endorse the need for foreign observers, which was to defile the independence and national governance of the people of Iran.

Every legitimate poll produced by reliable polling stations, accessible to some of the party leaders—because of the rank and responsibilities of these gentlemen, indicated the indisputable lead position of the successful candidate. Also, the sheer differences in the number of votes after the counts clearly indicated—even if there had been any doubts—that they should now give up the allegations of fraud. However, despite the clear indication of a lack of any possibility for fraud, the instigators insisted in their claim and continued their preplanned machinations of creating chaos in the country.

In this regard, Mr. Saeed Hajjarian writes:

Prior to the election, Mr. Goodarzi produced poll results from ISPA [Iranian Students Polling Agency] which showed the gap is so significant that Ahmadinejad does not need to attempt any fraud [to win the election]. Most other accused have similar opinions and they reject the idea of fraud.

A base was established in Qaytariyeh that became the source of widespread illegal activities, such as spreading rumors, discrediting other candidates, giving rise and impetus to other illegal groups and inciting them to the streets, launching an illegal broadcasting service, and building connections with BBC

Persian Service. This caused the latter to become the leading element in directing the riots and the street unrests and a fundamental force in driving one of the losing candidates to radicalism and sedition.

Resulting from illegal broadcasts of a television service from the Qaytariyeh base, and contrary to the election laws, the instigators were still engaged in election propaganda even as voting was in progress. Worse still was the alliance made between this television service and the colonialist BBC service, which indeed transformed this base to a propaganda service for the British. At 18:00 on Friday 22 Khordad [June 12], as the voting was underway, a group of security forces were sent to the said base in order to shut down this illegal broadcast service. The security forces were confronted with resistance and in turn were taken hostage by those running the base, who then called upon their supporters—who had been prepared for confrontation and were on standby—to resist the security forces and attempt obstruction of justice. This incident was the start of subsequent chaos that ultimately destroyed much of the nation's security gains, and defiled the glorious economic, political, and cultural achievements of the elections.

It was reported that at that time Mr. Aminzadeh had said:

The authorities are here inspecting. The news of the raid has spread and thousands of people are gathered in front of the base. It is good that they have come. Most likely the news of Mousavi's victory will be announced, then they can go to Sadr Street and from there expand to other major motorways. And if Mousavi did not win, we will rally the streets in protest.

Though this statement, coupled with what was quoted previously from Mr. Mousavi, is sufficient evidence to prove the accused persons' involvement in a preplanned arrangement for creating unrest after the elections, to further prove the charges, I refer to the documented minutes of the meeting at 18:00 on the 21 Khordad 88 [11 June 2009] held at Qaytariyeh base with Mr. Aminzadeh as the chair:

At this meeting—in the presence of a number of key individuals from Participation Front Party, such as Messrs. Tajzadeh, Mourteza Muballegh, Shahaboddin Tabatabaie, Mrs. Towhidlou, as well as key members of other parties such as Kargozaran and Mojahein-e Enghelab, including Messrs. Atrianfar, Hedayat Aghaie, Arab Sorkhi, and Ali Hashemi, and also leaders of youth branches and other nascent illegal groups for street riots, such as Setad 88 and Pouyesh—Ali Hashemi presented a fabricated poll rejected by all official and reliable polling center. [This poll] was in considerable discrepancy as compared to the scientific polls from the country's official centers, and this, for the most part, made it obvious that it was produced with the intention of advancing a certain agenda, [that of] raising the level of excitement and passion among the naive [and] youthful participants who are new to the political arena, and in order to prepare them for riots after the elections. Ali Hashemi said: "In total Mousavi has 18 million and Ahmadinejad 10-11 million votes. If the results are anything other than this, there must have been fraud, which would require certain actions." Subsequent to such provocations, the youthful participants, who, by virtue of their age, are more prone to seeking justice, suggested a more fierce reaction in the hours following the election. However, Mr. Tajzadeh, a senior member of the Participation Front Party, calmed the group down and discouraged them from protests on the eve of the election and postponed them to the day after the election. He said: "We should not initiate it. We should wait and see what Mousavi says and organize the protest accordingly."

The relation between this statement and that of Mir Hussein Mousavi sheds further light on the complexity of the coordination of illegal riots and protests.

It is in the context of the statement of Mr. Tajzadeh that, in coordination with the leaders of the upheavals, the initial statement was issued after the official announcement of the election results. It called the magnificent participation of 40 million freethinking and intelligent Iranians a scandalized plan and a predetermined event. In an open confrontation against the votes of the Iranian people, they rejected the results and, from the first statement and those that followed, called the glorious and epic election of the people of Iran a 'magic coup' and other such disdainful titles. Such accusations are directed towards a

great segment of the nation's public service and insult the intelligence and awareness of the people who themselves participated at the elections and witnessed the events firsthand.

Issuance of such inflammatory and illegal declaration, and other such statements from the leaders of Participation Front Party and like-minded groups, was supported by intense and extremely provocative propaganda from western media and anti-revolutionary satellite channels. [All of this] gave impetus to passionate supporters of the losing candidates and paved the way for the saboteurs and conspirators who had been placed and prepared to take action. The sudden appearance of these provocateurs joined in by the supporters of other political parties attacking garbage bins and bus stations, and setting fire to motorbikes in the northeast area of Tehran, altered the appearance of the area to a warzone within a few short hours. The harsh consequences of such bitter events on internal security, and the damages it brought to Iran's image in the international arena, are not a secret to anyone.

In interrogations regarding the said declaration, Mr. Hajjarian writes: "This declaration encouraged some people to shout slogans and protest, break windows, and engage in other illegal acts to create riots, so that the media and foreigners can use this to create an atmosphere of frenzy."

Despite repeated statements by the high-ranking authorities and officials of the regime who encouraged [the protestors] to pursue their claim through legal avenues instead of unreasonable insistence on nullifying the election—given the clear evidence of the involvement of illegal and destructive forces of these parties and their affiliates within and outside [the country], the Participation Front party issued again a declaration on 25 Khordad 88 [15 June 2009] calling the elections a coup and demanding the elections be nullified. They thus advanced their preplanned agenda. In addition to their baseless accusations against the legitimate government, this political party unleashed its supporters onto the streets and incited them to illegal riots and created fear and terror among people, disturbed the freedom, life and work of fellow citizens, and caused death and injuries to many countrymen which resulted from a raid by the protestors on an army base on Azadi Street in Tehran.

Honorable Justice of the court;

This unlawful behavior of encouraging [their] supporters to rally the streets with the aim of confronting a legitimate government, is not a spontaneous act arising from emotions and passions owing to defeat in elections, rather according to documented evidence, such is a common strategy adopted by this seditious party, whose modus operandi is "pressure from beneath, negotiations from above," a slogan that has been repeatedly used by its leaders, and which has been repetitively put to practice over the last many years. To this effect, the leaders of the Participation Front Party have been active in forming illegal organizations and groups that are not registered with the Ministry of Interior during the recent elections. The formation of these organizations is based on the Goldquest [pyramid scheme] method, namely Ra'y [vote] Organization, Mowje Sevum [the third wave], and group 88.

Mr. Saeed Hajjarian said: "This organization has a cluster format, similar to Goldquest. Mr. Mirdamadi was its architect and we voted for it and endorsed it at our headquarters."

Instead of seeking legitimate political and legal avenues to pursue its interests, this party insists on using people and its supporters as a tool to impose its agenda on official government authorities and offices. This is not simply a slogan, and it is not limited to the period when the party is not represented in the government. It is a principle belief of this party that even when in power, it must resort to crowd power to impose its interests on other segments of the government. In the official three-step guideline of the party, it says: "Significant independence is to be granted to the democratic of the government to utilize the power of the masses in order to achieve reconciliation."

Such a disturbing and hypocritical point of view, where the government has a dual role of a sovereign ruler and an opposition force simultaneously, suggests abandoning human ethics in the political arena. To suggest a guideline that adopts ‘absence of governance,’ ‘bipolar governance,’ ‘political obstruction,’ ‘civil disobedience,’ and ‘active resistance’ in a system where the governing power would rule both the executive and the parliamentary branch at the same time is nothing short of hypocrisy. Such plans had been executed by the party in the past. Even during the times when the government was formed through the vision of the said party, it organized illegal street riots that caused injury to people, damage to properties, and harmed the image [of the country]. Yet another example is the sit-in incident at the 6<sup>th</sup> *Majlis*, when the party tried to forcefully bring people to the scene so as to oppose the lawful decisions of the authorities in charge, but, due to the lack of the public’s interest, their efforts did not amount to anything.

Given that the Participation Front lacked popular support and did not have many followers to bring to the scene in order to, as they put it, ‘create pressure from the masses onto the regime,’ it seized the opportunity at election time, at the heat of emotions, to display its crowd power.

Honourable Justice of the court;

In an effort to understand the root cause of the deviant and unlawful behavior of senior members of the Participation Front during the recent events, and in order to determine the reasons for this party’s opposition to the regime and its rejection of people’s majority vote, some of the documents found during the investigation process at homes and offices of the members were reviewed. These documents demonstrate this party’s fundamental diversion not only from Islam and the divine virtues, but the party’s direct contempt of the Constitution and the principles of the Islamic regime. Some of these documents even contain plans for betraying the country. These have been published as an official document entitled *Blueprint: Strategic Contemplations*.

[After confronted with] some of the issues contained in this document, to which I will refer below, the majority of senior members of the central committee who underwent investigation expressed their remorse and asked for forgiveness.

Included was Mr. Saeed Hajjarian, a member of the Participation Front’s central committee, who readily admitted to errors and deviance on every line in the document as it was being read out by the case officer—even before the officer had a chance to comment on the text. When he [Hajjarian] was asked, “When you knew so clearly the deviancies, why did you not correct them?” He responded: “I criticized all these deviancies, but no one took any actions to change things.” Referring to the text of this vital document, Hajjarian rejects most of its content and says:

The Islamic Republic has been and continues to be legitimate. To claim that at any point there have been different leniencies is wrong. To claim that the regime has limited capacity is wrong. The term ‘liberal dictatorship’ is wrong. There is no ‘totalitarianism’ in Iran. To refer to Iran with terms such ‘absolutism,’ ‘totalitarianism,’ and ‘sultanism’ is wrong.

Mr. Hajjarian considers such erroneous analyses contrary to the reality of the Islamic Republic and indicates: “In drafting this document, Mr. Alavitabar was influenced mostly by two books written by Mr. Bashirieh.” On this issue, Mr. Hjjarian says: “Hussein Bashirieh was in touch with Professor John Kane, and they met several times. He has written many books about ‘transition to democracy,’ which, in content, is very much in line with the goals of the Soros Foundation.”

Honorable Justice, you are well aware that Mr. Bashirieh is a secular, American based individual, and also that Mr. Alavitabar was accused of being a guest at the shameful Berlin Conference. Moreover, John Kane is an agent of the British Intelligence Service and one of the leaders of the velvet coup conspiracy.

Now, how such political theoreticians of a party can claim to be supporting the founder of the Islamic Republic is in itself a subject for further speculation.

In response to the question: “Aware of these blatant deviations and discrepancies, why did others sign this document?” Mr. Hajjarian said: “Ninety percent of the central members do not even know the text. They have not even read it once. They signed it based on their trust on others.”

In response to the same question, Mr. Safaie Farahani, another senior member of Participation Front and the party’s vice-secretary, said: “I am not a political man, and my political knowledge is less than an average person. My expertise is in economics. I signed this document based of my trust of others.”

Later on in the investigation, he commented on some of the provisions of the party’s document, which bares his signature, saying: “If this document is typed correctly, I fundamentally reject its content.” Elsewhere he said, “I do not understand the meaning of this section, and when I read this document in detention, I did not understand the objective of these provisions.” With respect to the roots and reasons for the party’s deviancies, Mr. Safaie Farahani listed the following:

1. The Reading of books and articles on various websites, and the listening to discussions broadcast on satellite channels;
2. The millions of dollars in annual budget for propaganda activities provided by the United States, Britain, Holland, etc.;
3. The launch of Persian radio and television broadcasts (over 30 channels) by the above cited nations;
4. The use of fraudulent documents and the exploitation of persons who were previously in Iran, such as Sazgara, Ganji, etc. by showcasing them on these channels in an effort to misrepresent the essence of the regime;
5. The lack of effort from within the country to tackle and counter-balance the actions of foreign broadcasts through presentation of effective and interesting discussions;
6. The Individuals’ who continue their educations abroad and their continued connections with their professors, and access to alternative assessment tools with which to evaluate our country, and being influenced accordingly;
7. The People’s expectation to be more informed of news from within;
8. The connection and exchange with professors outside the country and receiving internet reports from well-known universities, some of which have created a special page [on their sites] dedicated to Iran where they post and update their analysis. Such postings can greatly influence those who know English, given that these articles are published by well-known universities and are written by internationally recognized figures. Moreover, such analysis are not lengthy as books, and are typically two or three pages long and appear as simple analysis, yet they can have great influence on one’s opinion and can change ones thinking.

Mr. Ramezanzadeh, the Deputy Secretary of Participation Front party, while expressing his innocence with respect to the content of the party’s general guideline, commented on certain sections of the document in question, saying: “In my opinion this theory is completely incorrect.” In other instances, in reaction to the content of the Participation Front’s party documents, he was stupefied and replied: “Such analysis is contrary to the principle guidelines and the manifesto of the party as declared by its founders.” In another place, he writes: “This is a clear deviation from the party; it is unacceptable and intolerable.” In reaction to another section of the party’s guideline, Mr. Ramezanzadeh writes: “This analysis is very distorted, unacceptable, and unreal.”

Mr. Aminzadeh, who, owing to his position which prevents him from holding membership in parties and groups, resigned from the party, yet in actuality has had an active involvement in the core theoretical aspect of the party, declared his innocence against the bulk of the provisions in Participation Front’s

general guideline. When asked if he drafted some of the provisions in this document, he denied such suggestion and said:

This draft is a very bad one. The content in the primary sections are badly worded and are provocative. It is written without consideration and in an improper language—in a sharp and curt tone. In my opinion those who composed this text could not even get it printed in the papers. Therefore, I am very surprised that it was used as a strategic blueprint of the party. There should have been much more care in the composition and wording of such document, more than an article for publication. I am truly disappointed that my writings, which are carefully composed, appear side by side on these pages, thus rendering a text that is both provoking and problematic.

In another section, Mr. Aminzadeh writes: “In my opinion, this type of conduct and the lack of care demonstrated in this material causes a great deal of misunderstanding between the parties and the governing authorities. Such lack of care not only fails to enhance the performance of the party, it has also jeopardized its future activities and functioning.”

Honorable Justice of the Court,

Is it not obvious that a party, whose guideline, which was drafted over a long period of time, in collaboration and consultation with its core members and leaders, and contains such extensive errors and deviations, that its most advanced members question its substance and openly and sincerely reject these deviations, loses credibility for further functioning? In particular, the execution of these policies during recent events has caused considerable damage to the country. Regrettably, a great number of documents and declarations were issued based on this framework, which ultimately caused grave political and security challenges.

One such document from the Participation Front, entitled *Proposed General Guideline*, which was the basis for the wrongful activities of the party during recent events, was published and—subsequent to its approval by the party’s central committee—ratified at the party’s 11<sup>th</sup> congress. This document contains such disgraceful anti-nationalistic and anti-Islamic phrases and suggestions that I doubt that any legal political party, since the inception of legal political parties and groups in Iran, can match such blatant deviation in its official records.

The content of the mentioned document, which was composed and drafted by the core members and their advisors after numerous meetings and discussions, is so criminally deviant that an attempt to outline its deviations and contradictions vis-à-vis Islam, the Constitution, and the policies and values of the people of Iran would require a session on its own.

In the following lines, however, with the permission of your Honor, I would like to briefly refer to some excerpts from this document.

An initial draft of this document, signed by a number of the members, which contains profane phrases and shameful suggestions, is submitted to the file as an exhibit. However, since this draft has not been approved by all the members, it will be presented to the respected court as an evidence against only those who were signatory to it.

Even though the content of the initial draft is indicative of the party’s uncensored ideologies, and the final version has since gone through a number of revisions to secure its contents’ legal phrasing and to make it palatable and acceptable to other members, in order to avoid any legal disputes and to respect the legal process, I will only use some brief references in the final draft:

1. Item A.1 of this document, indicates [the party’s] attempt to create a clear historic distortion by characterizing the Islamic revolution of Iran as a ‘republican revolution in line with religious

principles,' and not as an 'Islamic Revolution.' This is clearly in contempt of the Constitution, a blatant violation of the views of Imam Khomeini (may his soul rest in peace), and an absolute disregard of thousands of martyrs who shed their blood to realize a revolution with a doctrine.

2. Few lines further, [the document shows] absolute disregard for the regime's respect for the majority vote, and contempt for the will of the people, and sides with the views of power-mongering parties and the votes of a few. It violates the path of the Prophet of God (pbuh) and his holiness Imam Khomeini (may his soul rest in peace) and disrespectfully proclaims "giving precedence to the will of the people against civil institutions and the mass participation of the noble people of Iran" as "participation of masses by force from above" and claims that after the passing of Imam Khomeini (may his soul rest in peace), an "oligarchy," i.e., rule of minority over the majority, is being imposed. [It further] use the term "autocracy," [claiming] that the country is moving from an "oligarchy" to an "autocracy."
3. Throughout, the document suggests that there is no democracy in Iran, [and] it makes references to "transition to democracy," i.e., conditions that are required for a regime to move from a dictatorship to a democracy. It identifies the steps and makes specific recommendations.
4. Item A.2 of the same document refers to the government of Iran as a "totalitarian," and a "military and sultanic hegemony." Giving some credit to the system of governance in Iran, [the document] then refers to it as a "liberal dictatorship." Using such language to describe a regime that rose from the blood of tens of thousands of martyrs and hundreds of thousands of sacrificial souls, and leaders who gained the majority votes of people and with unprecedented partnership in the international arena who were directly and indirectly chosen by people, is nothing but maliciousness.
5. The party describes its strategy in item A.2 as three levels:
  - Short-term: Resist the existing structure (the authorities in charge) and obtain power based on "transition to a greater democracy."
  - Mid-term: Amend the legal structure (the Constitution).
  - Long-term: "Absolute democracy" which means elimination of religion from the governing system.
6. During the interrogations, Mr. Ramezanzadeh, Deputy Secretary of Participation Front, explained in writing the definition of "absolute democracy" as understood by the party: "My understanding of the term 'absolute democracy' is an unconditional democracy, or even a non-religious democracy."
7. Item A.4 of the document considers the first step of the battle the formation of a democratic segment within the regime. Notwithstanding the grave betrayal of this party in using this term, suggesting a non-existence of a democratic body within the system at the time, it goes on to make it even worse by suggesting that formation of a democratic segment within the regime would necessitate an ideological and a principal change in the regime, and/or through an unpredicted occurrence.

Honorable Justice of the Court;

I beg of you to pay close attention to this quote:

Requirements for the initial step: “Formation of a democratic segment within the regime could be realized through a long process of change in ideologies and principles, or through an unpredicted occurrence.’ In either case, its sustainability necessitates the fulfillment of the following pre-requisites:

- In their official documents they suggest “lack of obligation to the Constitution and propagation for dual governance.”
- In its official documents and assemblies, the Participation Front divides the regime of the Islamic Republic of Iran into two segments of democratic and non-democratic. Notwithstanding the perversion of such a thesis, which indicates the lack of devotion and respect to the Constitution, the fact that this party considers attaining success of its objectives by creating discord within the regime, is an absolute contempt of divine and Islamic guidance and in direct contradiction with the path of the late Imam (may his soul rest in peace), who always insisted on unity and accord.
- Causing friction and creating conflict within the body of the regime.

Section 1 of the pre-requisites of the party’s guideline describes the advancement of democracy in following terms:

“To create a sustainable democratic branch within the system would require: [A democratic branch] to uphold meaningful alternative values and positions compared to the non-democratic branches of the government.”

In other words, the party deems it necessary to advance its objectives by way of creating differences—not only difference in style, but rather fundamental differences in ideologies and values within the pillars of the regime.

- [The party] postulates and conjectures the idea of aggression and continuous friction between people and the regime (pressure from the masses).

Instead of the unity and accord prescribed by Imam Khomeini (may his soul rest in peace), the Participation Front promotes separation and discord. It does not even content itself with suggesting fundamental differences in the pillars of the regime, and further proposes another condition for its continued presence in the government which is confrontation of people with the pillars of the government, i.e., through open street protests by the people. An exact quote from the party’s guideline reads: “The democratic branch of the government has to gain considerable independence in order to exploit mass pressure for the purpose of reconciliation.”

This is exactly the idea behind the street riots and the damages we witnessed after the election. The events of 18 Tir 1378 [9 July 1999], the sit-in at the *Majlis* in 1382 [2003], and numerous other incidents of entanglements during the period that they had power in the government are demonstrative of such mental framework.

Obviously, a party that proposes discrepancy within the pillars of the regime and endorses conflict between people and the regime, and officially puts such provisions in writing in its manifesto, and—instead of following the unifying views of the late Imam Khomeini (may his soul rest in peace)—adopts the British maxim of “divide and conquer,” will always cause, through its continued existence, unrest and turmoil for the people of Iran and would in turn satisfy the hegemonic foes and arch-enemies of the people of Iran.

Honorable Justice of the court;

Even though what has been presented to your Honor so far is sufficient evidence to ban the activities of this party, I would like a brief chance to draw your Honor's attention to some other issues that would shed additional light on the deviant nature of this party, which I think would be of assistance to the court.

□ Conjuring the betrayal of people of Iran

Through an astonishing and absurd act, the Participation Front party adopts an official strategic position—that is nothing short of betrayal of our beloved motherland, Iran, and allowing the infiltration of foreign powers—noted on item 4 of its pre-requisites to the first step of the general guideline. It puts it in print as follows—thus leaving an infinite mark of shame on whosoever refers to such passage.

“4- The democratic segment of the regime should exploit the crisis that is threatening the regime to assist in establishing democracy and for further negotiations.”

Historically what has been the political and partisan norm in most countries in the world is that in the time of crisis and in the event that the entire system of the regime is being threatened—either through war, foreign aggression, tight international sanctions, and/or when the country is in crisis as a result of natural disaster, or threatened by a coup or such events, all political parties, including oppositions, stand in unity and set their differences aside in order to preserve national unity and overcome the crisis, and they leave their differences to be dealt with once the crisis is over.

This is not only a political norm, but a natural and innate human reaction for any conscientious human being. If a family is being threatened or becomes a subject of aggression, all family members put aside their differences and leave their disagreements until they overcome the crisis.

The Participation Front, however, believes that, even during the time it holds power and has a segment of the government under its rule, it must exploit foreign threats against the regime in order to gain advantage vis-à-vis other segments of the government. [Imagine its efforts] when it is not in power! In that case, may God help the people and the nation! Even though most of the core members of Participation Front have sought forgiveness, in writing, with respect to this particular goal outlined in their strategy, such indiscretions are unfortunately not just theoretical ideas on paper, but that which has been executed by the party. The events that took place after the election are only a small sample of how these ideas were put to action.

Honorable Justice of the court;

We witnessed during the heat of the nuclear energy crisis and after the heavy sanctions that were imposed [on us] by dominating hegemonic powers—who made an alliance to create a crisis in Iran—that the people of Iran were shouting in unison, “nuclear energy is our fundamental right.” The manner in which different political parties and groups held together in unity was so powerful and impressive that it completely removed the hope of foreign powers in finding slightest of cracks. Even some blatant opposition and anti-revolutionary political parties adhered to this slogan in order to attract public support and to prove their national pride. Even then, it was only the Participation Front that was standing in opposition and trying to somehow find a way to let the dominating foreign powers to impose influence [on our nation] and to create a condition for Iran to lose ground in its quest for its fundamental right to nuclear energy. [It] was thus allowing the hegemonic powers to succeed in their goals and for it to perchance gain power over the regime or perhaps receive a prize from the foreign nations for such service.

At a time when the people of Iran proudly stood behind their foreign policy—and based on the Islamic Revolution's values and principles—forged ahead to pursue their lawful and fundamental rights, and

when the hegemonic puppets and regimes had become terrified of this national cohesion and unity, and displayed a show of alliance against Iran and faked an attempt to wage war [against us] in order to deter the people of Iran from their goal, the Participation Front became a repetitious voice that broadcast waves of emotional warfare similar to that of the hegemonic powers.

□ Participation Front in harmony with the enemy

The party's lectures, conferences, and exchange of messages during that crucial time are no secret to our people. However, as a reminder to the court and for the record, I will point out a few examples:

On 27 Esfand 1384 [18 March 2006], while people were protesting every day for their right to nuclear energy, the Participation Front, with denigration towards people who were expressing their objection, declared: "We are deeply concerned for the future of the country and consider the threat more serious than what can be confronted by propaganda alone, or [fought against with] people's national pride and pure-hearted passion for their homeland."

When the enemy was intimidating the nation with sticks and batons, and making verbal threats [against us], trying to discourage the regime of the Islamic Republic from pursuing its right to fulfill its goal in the field of nuclear energy, this party, in harmony with the bullying of our enemies, called for a humiliating defeat of Iran against the international hegemonic powers.

In its declaration, the Participation Front regards Iran's nuclear energy program an unreachable dream, and indicates: "It is out of concern that we ask the leaders of our country, instead of exerting so much of its energy on unattainable ideas, to find solutions to the afflictions of the nation."

Clearly, instead of being concerned about the country and national interests, this party is worried about putting at risk the interests of the colonialists' powers. It keeps close ties with the enemy to prevent the regime and the people from their national goal and fundamental right.

In that same declaration, the Participation Front predicted that if the existing trend continues, we will soon witness a permanent and complete abandonment of operation of the nuclear program imposed on us by the international agencies and thus asked that [the government] bow before the unwarranted demands of the oppressors.

However, the unwavering steadfastness of the government, coupled with people's insightfulness, brought to light the erroneous analysis of this party and revealed the nature of the party's dependency [on foreign powers].

The anti-nationalist and anti-people positions of this party on the issue of nuclear energy program becomes so prevalent that the party's Secretary-General, Mr. Mohsen Mirdamadi, who was, at the time, the Chairman of the National Security and Foreign Relations Commission of the 6<sup>th</sup> *Majlis*, asked for Iran's immediate compliance with the west. In a speech, which was published in the papers in Mehr 82 [Sept. 2003], he stated: "The international circumstances at the moment are such that if we do not comply, we will suffer further serious pressures from the international community."

□ Koulaei's request for an unconditional agreement to the Non-Proliferation Treaty

Another member of the central committee of Participation Front is Mrs. Elaheh Koulaei, who requested in Shahrivar 82 [August 2003] in an article published in Shargh newspaper for an unconditional agreement to the Non-Proliferation Treaty imposed by the international hegemonic powers, and called this the groundwork for the process of domestic reform, to mean economic, political, and social democratization. This reading is indeed an endorsement of the treacherous ideas found in the party's general guidelines.

The height of betrayal of the people of Iran with respect to the nuclear energy

The extent of betrayal of the people of Iran with respect to the nuclear energy program comes to light in comments made by Mr. Ahmad Shirzad, a senior member of the party's central committee, during the 376<sup>th</sup> sitting of the 6<sup>th</sup> Majlis, at the time when America and the Zionist regime, desperate in their attempts to confront Iran with regards to its nuclear program, saw themselves defeated in their futile efforts to convince other countries to agree with the issuance of sanctions against Iran. In a speech, the details of which were published in an official national newspaper, Mr. Shirzad strove to provide enemies of Iran with an official document containing the statements of one of the representatives of the *Majlis* during a parliamentary session, and thus attempted to pave the way for the ratification of enemies' additional sanctions against Iran. The following is a brief reference to his shameful declarations:

We could attribute this propaganda to the Zionist media; we could, as always, attribute them to international conspiracies and global arrogance and cry the cry of innocence of the regime of the Islamic Republic. We could also consider ourselves, as always, the pivot of the goodness on earth and attribute all evil to the enemy. But there is a simple point here; they have sufficient evidence, leads and facts to prove their case against us ... At the time they [the regime leaders] naively hid their heads in the sand and made unrealistic and ambitious plans, and adopted the most unreasonable and unpractical approach to acquire nuclear technology, they did not consider that their activities will someday be inspected and reviewed by international experts. The day that they designed the huge 50,000 square meter site, to use only a few square meters of it to install some minor equipment, they did not contemplate the fact that though it proved futile to produce the desired strategic technology, it would make the case for the arrogant [western] propagandists. Indeed, they should have predicted the headlines of "19 years of lies by the Islamic Republic" against us.

Prior to the above declaration, in the same vein, subsequent to the ratification of the Security Council and the Agency's resolution against the sacred regime of the Islamic Republic of Iran, the Participation Front issued statements in which it officially adopted a position against the national security of the Islamic Republic of Iran. In one such statement, while it called for Iran's adoption of the items proposed in the resolution and the unconditional acceptance of the provisions in the non-proliferation treaties, it adopted a tone as if to confirm the allegations made against Iran by the West concerning Iran's ambition to develop atomic weapons. These statements in this regard were published in Shargh newspaper on 17/2/82 [7 May 2003]. The following excerpt is hereby presented for the record:

While the Participation Front considers the development of nuclear technology for peaceful use a fundamental right of Iran, some groups and organizations criticize the deterrence strategy and consider it to be against the components of [our] national security, and deem political deterrence the best mode of defense for Iran against foreign threats.

Weakening of Iran's diplomatic strategy

In other such declarations, including one dated 26/6/82 [17 September 2003], the party attempts to weaken Iran's diplomatic strategy and while magnifying the disagreement between leaders of the regime, it asks that a decision making process be adopted.

Furthermore, the Participation Front drafted an immediate action plan to force the regime to accept the Security Council's proposed resolution. On 8/6/82 [30 August 2003], Shargh newspaper revealed the following text from a report written by the Participation Front caucus at the 6<sup>th</sup> *Majlis*:

One of the main issues in this meeting was to hear the complaints of the majority of the representatives in attendance about lost opportunities... Many of the representatives of the 2<sup>nd</sup>

Khordad [Front] believe that the *Majlis* must ratify a bill to force the government to agree to the Non-Proliferation Treaty.

Your Honor;

The issue that one of the foreign ministers from the three European countries in (5+1) summit brought up in his discussion with the Iranian delegation was: “Even if you refuse the resolution, we know that your Parliament will force you to accept this agreement through the adoption of an immediate action plan,” is on its own a clear indication of the party’s execution of its strategic plan to exploit the crisis that is threatening our entire political system in order to establish its own position. This is a clear indication of the betrayal of the people of Iran.

Abtahi: “Reformist were ready to accept the most tyrannical suggestions of the west.”

Honorable Justice of the court;

The Participation Front’s acceptance, with open arms, of the support of the foreign nations and its credit to the enemies of the people of Iran in retaliation for domestic disputes is not limited to the issue of the nuclear energy.

The approach of Mr. Mohsen Mirdamadi, Secretary-General of the Participation Front, while he was the head of the National Security Council in the 6<sup>th</sup> *Majlis*, is another example of such treacherous behavior. Mohammad Ali Abtahi, Secretary and Vice-chair of the Presidential Parliamentary Affairs Office at the time, writes the following in his interrogations:

The lack of dignity of the reformists in their foreign affairs was their most notable characteristic. They would not hold back from any indignity in order to render themselves favorable to the West. They succumbed to the most tyrannical suggestions of westerners, and agreed to them. Worst of all, they even predicted what the West would want from them and aligned themselves accordingly. The height of this was during the 6<sup>th</sup> Parliament.

As if the Foreign Commission was part of the foreign ministry of the West; it even criticized the foreign ministry of the time for its lax behavior and incompetence. As Mr. Karoubi put it, whomever the members of the foreign commission of the *Majlis* speak with, they sign the praise of the U.S. to them, even if that country itself is anti-American.

Mirdamadi’s desperate contacts

Mr. Mohammad Ali Abtahi goes on to say:

Mr. Ahmad Azizi, Iran’s Ambassador in Germany, said, ‘during the official visits of some of Iranian members of parliament, of which Mr. Mirdamadi was its chief officer, they referred to the regime and its leadership in such contemptible manner, discussing subjects such as [the leadership’s] election vs. appointment, that I found it difficult to take minutes.’

Denying the reality of Iran’s 30 years of democracy

By ignoring the glorious reality of 30 years of democracy in Iran, the Participation Front attempts to dedicate the second step of its strategy to ‘identifying capacities for transition to democracy.’ Item 1 of the second step describes the prerequisites for such an attempt:

“To identify the capabilities necessary for an elected branch of the government to be able to transition to democracy and to prepare plans to realize these capabilities.”

Participation Front's opposition to Shari'a principles

Honorable Justice of the court;

The bulk of the 'strategic blueprint' of the Participation Front contains such offensive and groundless text that it is not worth the time to mention here. However, I would ask the court's indulgence to draw Your Honor's attention to the following excerpts that could assist the court in its findings. Item 6 of the general guideline of the party contains an extraordinary anti-religious phrase:

"The party decides against making 'statutory laws' permanent simply because they are based on the principles of Shari'a law."

This is a blatant effort by the Participation Front to defile the rule of Shari'a in the governance of an Islamic country. In 1360 [1981], concerning the barred National Front, when the late Imam (may his soul rest in peace) declared: "As of today the National Front is condemned!" wasn't it due to the same reason?

As you are well aware, the only evidence to which the late Imam (may his soul rest in peace) relied upon to ban the National Front was a statement similar to what was quoted here-above from the Participation Front.

If this phrase, and other excerpts quoted here from the Participation Front's general guidelines, were taken from an article, or a speech made by a party member, or perhaps a newspaper interview, we could even say that it was said in a particular emotional state. But when the masterminds of the party, during a long process of consultation and discussion, with the assistance of like-minded non-party members, come to such a completely deviant conclusion and endorse such decision at their congress, what rationale can justify it?

Deviant principles of Participation Front party the root cause of chaos and turmoil

Honorable Justice of the court;

We are not here to penalize individuals or groups simply based on their deviant ways or ideas. The reason this body of evidence is presented here in court for legal confrontation is because it is precisely such defiled ideas that have been put in action to cause tremendous damage to the people of Iran. In fact, the root cause of much of the bitter incidents in the past and the recent chaos and turmoil is founded on these deviant ideas.

Participation Front party's internal documents

Unfortunately, the Participation Front's internal documents reveal some sad truths. At the party's committee meeting to outline its strategy on 19 Tir 1387 [7 July 2008], after providing examples of different models for seizing power, Mr. Hajjarian makes reference to the 'Gene Sharp' model for a velvet coup, with emphasis on 'pressure from below' and using the masses. He described it in this way:

This means crowds gathering in front of the Melat Park and such places, accumulating [crowds] little by little from different corners, and a labor-worker becoming a leader to negotiate with the regime.

Counting various models of seizing power in the country, Mr. Tajzadeh said: “The fourth approach is American arms and velvet revolution, and I am in favor of the fourth approach. Gene Sharp’s theory of soft overthrow from abroad and such are embedded in the fourth approach.”

Mohammad Reza Khatami said: “In addition to domestic backing, we should also count on foreign backing.”

Tajzadeh said: “This is the fourth approach, a model that in some countries occurred [and regarded to] as velvet [coup]. It does two things; it explains how you establish NGOs in the country, and what assistance America can provide for promoting democracy.”

Mirdamadi’s attempt to fashion the velvet revolution in a domestic context

The Secretary-General, Mr. Mirdamadi, said in this meeting: “Just remember that we decided that the velvet revolution should be “domestic.”

Unfortunately, this party’s cowardice is under the illusion that the Islamic revolution is about to collapse through American efforts, and thus if the party does not move quickly, it would lose the chance of being a part of the American-lead velvet-coup-government.

The result of such distorted thinking is that the Participation Front and Mojahedin-e Enghelab Organization seize every opportunity to compete in putting a velvet coup in action against the people’s regime of Islamic Republic of Iran; an example of which is the recent unfortunate events after the election.

Farideh Mashini: “We must emphasize on the fraud, however untrue.”

Based on documented evidence from Participation Front at its meeting on the day following the recent elections, the party’s Director of Women’s Commission, Farideh Mashini, says: “Some of our own group members are now of the opinion that maybe there was no fraud, but we must continue and emphasize the fraud.”

Mohsen Mirdamadi adds: “We won’t get into the details of the fraud; but there is no doubt that the results as they have announced it is not real.”

On this subject, Zohreh Aghajari says: “What we have created, could not have been created by Mousavi himself. We are responsible for the youth that are being beaten out there as we speak, because we brought them onto the scene. We must do something more effective, beyond issuing declarations and our viewpoints. We should declare our authority today.”

Jalalipour says: “We have far more work to do behind the scene than on stage.”

On the subject of ‘actions beyond issuing declarations,’ Mr. Safaie Farahani proceeds to incite the members of the central committee by saying: “The kid that is being beaten on the street today; the youth that has been shot; you and I are responsible for them. These young people are not political [activists]. You people, who are sitting around this table, are political; you have encouraged them to rise.”

Ramezanzadeh: “The elections were done accurately and according to the law.”

Honorable Justice of the court;

The statements that were read were not admissions during interrogations; no one should doubt their accuracy for any reason. What has been submitted to the respected court so far are for the most part direct quotes from the party's documents prior to their arrests, which have been relied on as exhibits. This evidence clearly proves that the idea of fraud is a machination of the parties and groups that were defeated to attract supporters and gain votes. It was they who shamelessly made calculated plans to spread such lies and provoke their supporters to engage in confrontations and cause turmoil. As per their own admissions at their party's meeting, they are responsible for the deaths and injuries in the chaos, which they caused in order to impose their will on the regime, and by taking advantage of the sentiments and emotions of some of their own supporters, they violated the right of the people and their majority vote in an ambition to take over the government.

In his admissions, Mr. Ramezanzadeh, Deputy Secretary of Participation Front party, writes:

However I look at the elections, I come to the conclusion that the elections were carried out properly and according to the law, and that it is incumbent upon everyone to accept the results and should not be doubted ... We apologize to the people for [our] wrongful analysis.

He continues to write:

Iran's circumstances can in no regard be compared to countries that have gone through color revolutions. The vast participation of people in the recent elections is indeed the result of 30 years of political participation in the country. We must apologize to the people for our wrongful analysis, because in the past we said if there is majority participation, we will win; but now that the majority participated, we did not win. As such, our analysis was incorrect, and we apologize accordingly.

Honorable Justice of the court;

It is true that it is never late to understand the truth and ask for forgiveness, and that correcting one's position at any time and under any condition speaks of maturity, but neither this plea for forgiveness, nor retributions against wrongdoers whose case is before the court could ever compensate for the irreparable damages done to the people, or prevent similar dreadful incidents in the future.

Prevention of crime is a constitutional responsibility of the judiciary. It is with respect to this responsibility—both as means of prevention and a note of admonition to the public—that I wish to present to the court additional evidence in an effort to assist the respected court in rendering an appropriate decision.

Why is it that individuals, many of whom at one point or another held official posts in the national security, intelligence, and executive institutions, and who are knowledgeable with respect to the election process, and are fully cognizant of the fact that there has been no fraud—declared it repeatedly at their meetings, and give themselves permission to publicly proclaim such allegations and lies and thus instigate their supporters to storm out onto the street? And, how can they justify endangering the lives of the public, their possessions, and dignity, and more importantly, jeopardizing the national dignity, for their ambition to rule?

How do these deviant documents and guidelines, and their anti-revolutionary declarations and messages, get approved by such party? Isn't this a clear example of being far removed from human conscience?

The driving forces of such deviances are cultural perversity and intimidation before the west, building and fostering close relations with western powers, and unconditional acceptance of the imposed ideas of liberalism.

Honorable Justice of the court;

The arms of this party are so wide open for unconditional embracement of imported and imposed hegemonic ideas, that if a perfect stranger from America were to step forward today, he would be sure to be granted a high position in the party with total influence over its core members.

Tajzadeh was laying the groundwork for the lecture to be delivered by the representative of the Soros Foundation in Iran.

The Soros Foundation, an undercover institution of the CIA with a mandate to interfere in the domestic affairs of countries, which has so far executed a number of velvet coups, some successful and some failed ones, is not unknown to Your Honor or to the people of Iran. The Foundation's senior advisor, or in other words the Foundation's representative in Iran is a certain Kian Tajbakhsh, who is among the accused before the court today. He is the son of former employee of the office of Farah Diba, the wife of the annihilated Shah. From a young age he studied in England and then lived in America. Subsequent to his return to Iran, the accused was invited by Mr. Mostafa Tajzadeh to the latter's office at the Ministry of Interior. The accused says:

When I received the invitation to the lecture at Mr. Tajzadeh's office, because I was new in Iran and did not speak Persian well, I assumed that I had been invited to listen to the lecture, not to present it. Therefore, I went to that meeting without any preparation. There were 10-12 high ranking directors from the Ministry of Interior present at that meeting. Mr. Tajzadeh sat me at the head table and asked me to address the group. I was completely taken by surprise, but had to give a short presentation. Surprisingly enough, I saw that Mr. Tajzadeh and the high ranking officers are rapidly and carefully writing down what I was saying. I asked Mr. Tajzadeh why he was taking note from my presentation, and he replied: "tomorrow, I have a speech to give elsewhere, and I will deliver your presentation in a much better way."

Saeed Hajjarian: "I came to know the Soros Foundation through Naser Hadian."

Saeed Hajjarian, another accused, speaks about the mode of communication with Soros institute. He says:

I came to know the Soros Foundation through Mr. Naser Hadian, Professor of Law at the University of Tehran, and met the Soros Foundation's representative (Kian Tajbakhsh) twice ... At our meetings we talked about how to increase the activities of non-governmental organizations in Iran. Another goal was to strengthen the civil society, and we were going to use the experiences of the Soros Foundation in color revolutions."

He goes on to say:

At the first meeting, Mr. Tajbakhsh gave me Putnum's [Robert D. Putnum] book. After I browsed through it, I felt it needs to be used as a textbook at our department. I asked him to translate it so we could include it in our curriculum. At our next meeting, we were going to study 'social investment' in Iran, and we prepared accordingly.

Frequent visits of some of the central committee's members to the United States and their residence there; the party members' regular participation at international conferences organized by the undercover CIA organization [Soros Foundation] in different countries; presence of the velvet coup theoretician and other protest instigators, in particular the British John Kane—known for his association with British intelligence services and Habermas [Jorgen Habermas]—in Iran, and his meetings with some of the Participation Front's central committee members, and thus influencing their views by suggesting fundamental weaknesses in [Iran's] social sciences departments at universities, mainly based on

translation of foreign texts; [have all influenced] parties such as the Participation Front and the Mojahedin-e Enghelab to completely turn away from the pure streams of Islamic principles. They have altered them instead to vulnerable assemblies that could easily be driven to treading dangerous waters.

□ Hajjarian and discussions with John Kane concerning a velvet revolution in Iran

In response to the question concerning the frequent traveling, back and forth, of Mr. John Kane to Iran and his meetings with some of the political party members on the issue of civil society, Mr. Saeed Hajjarian, member of the Participation Front's central committee, said: "Undoubtedly, it had to do with the western-style project of democratization of Iran. They are of the opinion that the techniques for color revolution that has worked in other places, is workable in Iran."

In response to another question with regards to his knowledge of John Caine's theories on color revolution, Mr. Hajjarian responded: "John Caine only spoke to me about phase one of this project, which is about civil society and strengthening its institutions." The fact that a person who has not been in Iran for 30 years, and is more American than Iranian, and all of a sudden becomes a senior advisor of a colonialist foundation, and who, fresh out of nowhere, occupies a high ranking position in a party, influencing its views and ideas, is not to be taken lightly.

Of course, the members of the central committee of Participation Front, like every other Iranian, are free to hold any ideology and follow the doctrine of their choice. However, when a party or an institution claims to be in complete accord with the beliefs and principles of the late Imam (may his soul rest in peace), and, based on such claim, recruits supporters, and in fact pursues its objectives through blatantly contradictory ideologies such as those of the Bashirieh and the Soros Foundation, then it becomes the issue of [public] deception and must be legally prosecuted.

Is it reasonable to constantly criticize the high-ranking authorities of the regime and complain against their diversion from the principles of the late Imam (may his soul rest in peace), yet turn around and give one's ideological leash to Mr. Kian Tajbakhsh, whose principles are in no shape and form in line with the views of Imam Khomeini (may his soul rest in peace)?

Honorable Justice of the court;

A few days ago, Mr. Tajbakhsh told his case officer that until recently he had never uttered the word 'Allah;' he said this word made him 'feel strange.' He then eagerly proceeded to ask his interrogator to teach him ablutions and prayers, and with the assistance of God, he now recites his prayers from a written text. How is it then that the members of the central committee of a party who claim to be educated, allow themselves to be ideologically swayed by an individual who is entirely unfamiliar with the fundamentals of Islamic principles or by the other individual who was mentioned earlier, but instead fiercely resist the ideas and views of the most notable internationally acclaimed Islamic scholar. And instead of adopting and following the ideologies of their own national leaders, they resort to such individuals. It is precisely this type of divergence and departure from the core and such dependence on imported western ideologies that is the root cause of irreparable wrongs, and that compromises the capabilities of our own best minds against the principal foundations of the regime, which in turn gives rise to such turmoil and acts of disobedience.

The overwhelming evidence clearly demonstrates the extent of excessive and unwarranted association of the party leaders with representatives of foreign countries—unprecedented in the history of the independent political parties in Iran—and shows the party's ongoing communication with suspicious elements associated with foreign intelligence services.

Honorable Justice of the court;

More evidence of Participation Front's deviance is the close and continuous association of the party's influential and leading members with the deviant and American-based Nehzat Azadi [Freedom Movement], and being influenced by it.

Typically, the political parties and groups in the world adopt lofty goals for themselves. It is unfortunate, however, to find that in its official documents and guidelines, the Participation Front takes such extraordinary position to base all its efforts and principles on gaining power. The content of the document is this: "Any action taken by the party, its preparations for and reflections thereafter, should be pivoted upon opportunities to gain more power and effectively influence [the regime]."

Not only do such views and objectives lack correspondence with Islamic principles and beliefs, but they also contradict socialist and liberalist ideology. This is mostly based on Machiavelli's [Nicolo Machiavelli] teachings, and the view of power as the only means by supremacist groups. Such is the goal of the Participation Front. This reality does not end at this sentence in the party's documented blueprint. There is left no room for doubt that perhaps it might have been an error. In fact, the inter-party discussions and recurring theme of the central membership consultation sessions pivots around the ways and means to achieve power. The results of such outlook cannot be other than constant friction and tension.

The following excerpts are submitted [to the court] as examples of declarations and statements issued by the Participation Front, which clearly demonstrates how the idea of fraud was insinuated and how the party provoked and encouraged the riots and chaos.

Participation Front party's statement dated 25/3/88 [15 June 2009]:

"The 10<sup>th</sup> presidential election is entirely defiled and indefensible. The Participation Front is asking that the elections be nullified."

Participation Front party's Statement dated 27/4/88 [18 July 2009]:

"The people [of Iran] have no expectation but that the legitimacy of a regime that is based on fraud not be officially recognized."

Participation Front party's statement dated 14/5/88 [5 August 2009]:

"At the threshold of its fourth decade of its reign, the regime of the Islamic Republic has displayed such actions that are not only against divine and moral values, but fully resemble the conducts of a tyrannical and authoritarian regime."

Based on the above evidence, I ask the respected court to rule for the dissolution of this tension-creating, anti-national security assembly.

Furthermore, it is requested under Article 10 Commission of Parties Law—ratified 1360 [1981], to take appropriate action pursuant to article 16 and 17.4 of the said law.

Honorable Justice of the court;

With respect to the Mojahedin-e Engelab organization, considering its similarities in ideology with that of the Participation Front, and the fact that they even share members in their central committees, and their

alliance in the recent events, what was said in the introduction, particularly references made to the elections also pertain to the Mojahedin-e Engelab. However, in order to address the specific [role of this organization] in the recent turmoil, I deem it necessary to request Your Honor's indulgence to submit some additional evidence to the court.

A) Mojahedin-e Engelab organization's role in distorting public opinion and creating doubt with respect to the healthy nature of the elections:

In the past few national elections, whenever this organization has been defeated, it has questioned the health of the election process. Due to the significance of the 10<sup>th</sup> presidential election and its relevance herein, I will first address the seditious positioning of this organization during the recent elections, and will then draw the court's attention to [the organization's] similar conducts in previous elections.

A-1) In a declaration known as 'the declaration of the Mojahedin-e Engelab-e Islami of Iran organization's support for the candidacy of Mr. Mir Houssein Mousavi in the 10<sup>th</sup> presidential election,' issued on 21/1/88 [10 April 2009], the said organization, in alliance with anti-revolutionary enemies categorically, but without any evidence or documented support, claims that the election is not healthy. To this day, however, it has not been able to prove its allegations. The declaration says: "Not much trust remains with regards to election data, be it the figure for eligible voters, the statistics relating to participants, or the cast votes for each candidate."

In another declaration, entitled 'warning of Mojahedin-e Engelab concerning buying votes during the 10<sup>th</sup> presidential election,' issued 28/2/88 [18 May 2009], which was referred to as its 3<sup>rd</sup> election declaration, they made an unwarranted parallel suggesting that the elections subsequent to the departure of the late Imam (may his soul rest in peace), similar to those during the reign of the tyrannical Shah, are predetermined. The declaration says:

The conducts of the tyrannical Shah's regime in staging pre-determined elections through preparation of a list of its chosen candidates and presentation of such list to those who performed the election process, was an important element to prove that the elections were fraudulent, fake and controlled, i.e., given the structure of the elections and the fraudulent nature of the process allowing illegal manipulations, ultimately produced the final results based on the names that were fed into it; thus generating a predetermined outcome.

It immediately continues to stipulate:

During the recent years—subsequent to the passing of the Imam, along other political streams and efforts to limit people's power to elect, there has also been a shift in the election process to a two layered election, whereby some have been entitled, above and beyond the people's [will], to sift through the list of candidates based on their own personal choice, criteria, and political agenda, and, unfortunately, we must say that such efforts during the past recent elections have hindered the process of a true election in the country.

The 24/3/88 [14 June 2009] declaration issued subsequent to the announcement of the 10<sup>th</sup> presidential election is yet more evidence of the role of this organization in promoting crisis and disturbing public opinion aimed at creating doubt in the health of the election and defiling the legitimacy of the regime. The declaration says: "What has happened in this election, in addition to unprecedented and widespread fraud and deceit with respect to the actual votes, has been an extensive abuse of every possible avenue of power at their disposal, to fabricate and produce the [desired] votes."

Honorable Justice of the court;

During the interrogations, the members of the Mojahedin-e Enghelab organization were asked what evidence they relied on to claim, so emphatically, that there was fraud in the elections. In response, they passed on the responsibility to Mr. Mir Hossein Mousavi's election office, and the Committee for the Preservation of Votes, and could not produce any evidence of their own. The members of this organization have no consideration for the consequences of spreading such lies that have brought grievances on many lives and brought about much material damages. By claiming that they have only expressed their opinion, they simply brush off their shoulders the responsibility of those who were killed as a result of their reliance on this organization and other such parties who provoked them to commit such crimes, as it was discussed briefly in previous proceedings. Ultimately, when they are asked logical questions for which they have no answer, they rely on one sentence saying, "we have had no evidence to suggest fraud and should be bound by the law."

Furthermore, on 23/3/88 [13 June 2009], the Mojahedin-e Enghelab organization issued a message with regards to the arrest of Behzad Nabavi, in which, in harmony with the anti-revolutionaries and foreign enemies, including BBC Persian and VOA, it calls the elections manipulated, and states:

Subsequent to the recent scandalized election, referred to by both domestic and international political communities as a soft coup against democracy and republicanism, the authoritarian regime is exerting a widespread shameless effort to arrest political activists who are criticizing the government and expressing their opposition to it.

It goes on to say: "Undoubtedly, the wave of arrests of political activists is yet another grave mistake in continuation of confiscation of people's vote during the manipulated 10<sup>th</sup> elections."

As always, the Mojahedin organization uses vague but spiteful language in its messages and targets the entire regime. In this trend, within the text of this message and other statements, repeatedly it uses the phrase "authoritarians in power." Following is an example of such reference: "We warn the authoritarians in power to awaken and face their responsibilities and not jeopardize the fate of the regime and the people of Iran for their desperate attempt to hold on to power and to pursue their selfish desires."

The Mojahedin organization has not provided any evidence for "authoritarians in power," yet it uses this generalized and vague phrase to provoke disturbance in public opinion, and in accordance with its usual trend, continues to issue chain statements and messages and repeat the allegations concerning fraud in the elections.

Honorable Justice of the court;

From its inception, this organization has displayed a double identity. On one hand it claims to be a follower of the path of Imam, fighting for Islam and the revolution, and on the other hand its actions are contrary to the path of Imam, the revolution and Islam. The above references were indicative [of such trends]. Additional references to documented evidence are provided below.

1. Weakening the pillars of the regime:

The Mojahedin organization, in the same direction as the enemies of the revolution, has had a pivotal role in the weakening of the pillars of the regime. Following are some examples:

- Issuance of chain open-letters addressed to the Supreme Leadership with the goal of weakening the superior position of the *Velayat* and challenging the essence of *Velayat-e Faghih*, specifically with the assistance of a key figure, Behzad Nabavi, to the point that in one such letters, known as 'poisoned chalice,' signed by 127 political activists, including the members of the organization,

they shamelessly suggests the Supreme leadership of the revolution to drink from the 'poisoned chalice' similar to the Imam.

- According to reliable intelligence sources, in the meetings of the organization's core group, they have discussed focused attacks on the Supreme Leadership, however, in the open, they use vague language, phrases such as "authoritarians in power," "limiting the power and making [the regime] accountable," "autocratic," and "dictatorship," etc.
- Voting at the Isfahan branch on whether to extradite the regime authorities, especially the Supreme Leader, to America in order to avoid American military attack to Iran.

## 2. Attacking the Guardian Council:

One of the organization's ongoing efforts, especially during the elections, was attacking the Guardian Council, criticizing and accusing it of imposing self interests in approval or rejection [of candidacies'], without providing any documented evidence or proof.

## 3. Attacking other institutions of the regime:

Another consistent trend of the Mojahedin organization is its attacks on revolutionary institutions, such as the *Sepah*, and the *Basij*. Again, without providing any evidence or proof, it accuses these sacred institutions to have interfered with the elections, and by using the phrase 'garrisoned political party' it defiles the public opinion against the legitimacy and healthiness of the election and the lofty position of the said institutions.

### A-2) Providing pretext for the enemies:

Your Honor, reviewing the trends of the organization's activities and that of some of its central members, including Mr. Bahzad Nabavi, shows that whenever enemies were in need of any excuse to denigrate the sacred regime of the Islamic Republic, this organization, among others, has been readily available to realize their wishes.

Following are some examples:

- The plan of negotiations and discussions with Americans, without permission from anyone [authorities], by Mr. Behzad Nabavi. These efforts were carried out from within the government with the aim of showing serious opposition against the foundation of the regime.
- Disagreement and opposition of Mr. Behzad Nabavi with the continuation of uranium enrichment process, by repeating the enemies' claim as to the cost of such effort exceeding its benefits.
- Suggesting forming an alliance with the Taliban at the time of U.S. attacks on Afghanistan, after the September 11<sup>th</sup> incident.
- Endorsing the enemies' claim with regards to violation of human rights in Iran.
- Rendering normal and removing shame from any and all suggestions of foreign support and interference during the national election campaigns.
- Suggesting that there is dictatorship in Iran.
- Dismissing the accusation against the enemy concerning its hostile reaction to the claim that some groups from within are provoking the enemy.

### A-3) Attacking the sanctities and foundation of Shi'a beliefs:

Another distinguishing characteristic of the Mojahedin organization is denigrating the Shi'a religious values and principle beliefs. Most noteworthy example is the offensive comments of Hashem Aghajari directed at the source of emulation, ecclesiastics, and religious people in his heated and tumultuous speech in Hamedan, where he accused many of the Ulama and reputable and experienced political figures a source of discord and of leading the youth astray.

As one of the most significant reactions, we can refer to the historic letter by late Ayatollah Meshkini who condemned this organization.

Also, prior to the above, Shaheed [martyr] Lajevardi called this organization a hypocritical one, and considered it more dangerous than the notorious *Monafeghin* [hypocrites] led by Masoud Rajavi, and he warned them against their acts of betrayal.

The following are analysis of those who consider this organization a source of hypocrisy and dangerous.

As a comment to correct the final manifesto drafted by Mr. Armin at the conclusion of the 12<sup>th</sup> congress, Mr. Nabavi writes: "Brother Armin, greetings to you. The first pages have a very oppositional tone. All of this can be said in a way that it is also in solidarity with the revolution and the Imam."

The above sentence is clearly indicative of the essence of hypocrisy in this group, using the mask of the path of Imam and revolution, etc. to deceive people and attempt machinations against the nation and the Islamic revolution.

The references below are excerpts from declarations and statements issued by the Mojahedin-e Enghelab organization in which they clearly suggest that there was fraud in the election and thus have encouraged and provoked [people] to take part in riots and to protest and create chaos.

Mojahedin-e Enghelab organization's statement dated 26/3/88 [16 June 2009] says:

Without continued support to Mr. Mir Hossein Mousavi and while expressing our deepest regards and gratitude for his unwavering efforts to preserve the votes of the people and demanding a re-election, we are hereby asking the honorable people of Iran to take action and express their objections based on the principles laid down in his [Mousavi's] statements.

Mojahedin-e Enghelab organization's statement dated 24/3/88 [14 June 2009] says:

"This election was not only historic because of the level of participation, but also because the widespread fraud was unprecedented in the history of Iran."

Mojahedin-e Enghelab organization's statement dated 31/3/88 [21 June 2009] says:

The organization reiterates that the government that is emerging from an election, the health of which is questioned by a great number of its people, and because of which it is considered null and void, and a regime that is forming on widespread wave of aggression against its nation, has no authority and legitimacy.

Honorable Justice of the court;

Because of the volume of documents and evidence, only a portion of is filed in this court as exhibits along with the indictment so as not to use the courts precious time any further.

However, considering the actions of these organizations, especially since the inception of the 2<sup>nd</sup> organization, they can in no way be assessed in accordance with the path of the late Imam (may his soul

rest in peace), and/or the Islamic revolution. Pursuant to section C, note 3 of the organization's doctrine and code of conduct, which states: "Any divergence or departure from the Islamic identity and genuine nature of an organization will be considered betrayal of the founders of the organization, and will automatically cause the dissolution of the organization," it is hereby requested [of the court] to consider this organization dissolved and its members convicted, especially with regards to promoting unrest and turmoil during the 10<sup>th</sup> presidential election which generated material damage and caused deaths to the noble people of Iran. [The court is hereby asked to issue a conviction] pursuant to the Islamic Penal Code concerning real people, and based on article 16 and 17 of the Law of Political Parties, ratified in 1360 [1981].

Furthermore, specific indictments outlining the charges for each accused present before the court today has been submitted to the court, and will be read for the court in due course.

May God's peace, mercy and blessings fall upon you

Saeed Mortazavi

Public and Revolutionary Prosecutor of Tehran