

10 Mordad 1388 [1 August 2009]

INTRODUCTION

COMPLETE TRANSCRIPT OF THE PROSECUTOR GENERAL'S INDICTMENT OF THE ACCUSED PLOTTERS OF THE FAILED VELVET REVOLUTION

Fars News Agency: On behalf of the Prosecutor General, the deputy Prosecutor General of the Revolutionary Courts in Tehran presented the text of the indictments against those accused of a failed attempt to orchestrate a velvet revolution in the following manner: according to gathered evidence and the confessions of the accused, the incidents and turmoil that took place following the elections were preplanned and took place according to the velvet revolution's timeline of goals and events.

According to Fars News Agency's political analyst, the full transcript of the indictment, which was read by Abdolreza Mojtaba, deputy Prosecutor General of the Revolutionary Court (on behalf of the Prosecutor General) in court today, is available in six parts attached to this report.

FARS NEWS AGENCY

PART II:

Deputy Prosecutor General of the Revolutionary Courts in Tehran: The Recent Events and Unrest Were Pre-Planned

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According to Fars News Agency's political analyst, the transcript of the indictment, which was read by Abdolreza Mojtaba, deputy Prosecutor General of the Revolutionary Court (on behalf of the Prosecutor General) in court today, reads as follows:

In the Name of God the Merciful the Beneficent:

This is the text of the indictments of the general prosecutor of Tehran against the participants of the defeated velvet coup.

“When we bestow mercy upon the people, after adversity had afflicted them, they immediately scheme against our revelations! Say, "GOD's scheming is far more effective. For our messengers are recording everything you scheme.” [10:21]

Greetings to the honorable Judge of the Islamic Revolutionary Court in Tehran:

As you are aware, the wise and gentle Supreme Leader, having the wisdom of the Imams, has stated that the informed people of Islamic Iran participated in unprecedented numbers at the ballot boxes in order to cast their votes during the tenth presidential elections. They have contributed to an astonishing and unique

epic which reveals the political maturation and strong presence of the revolution, and displays the glorious ability and capacity of Iranian civil society before the world's watchful eyes.

Any just and fair person can easily see the great achievements of this epic movement in various political, cultural, social and economic spheres, and at the national and international level.

First, this election proudly displayed the people's influence, and conveyed this message to the world: that Iran is one of the most secure and stable countries of the world for investments and economic projects.

Second, in the field of international relations, this huge display of national support has increased the bargaining power and acquisition rights of the people of Iran to higher levels, has ensured greater success for our nation in the region and around the world, and cut short the reach of those who falsely claim support for freedom, democracy and human rights. Iranian statesman and diplomats can now participate in various regional and global transactions more resolve, based on wisdom, dignity, and the public interest.

Third, the great impact of this informed participation has affected the way the people of the world, especially elite scholars, see the rich culture of Iran and the political awareness of its people. This awareness has arisen from their Islamic and revolutionary beliefs, and has made world public opinion ever more aware of the importance of a system of religious democracy.

Fourth, since public support is considered one of the most important elements in relation to national security in the Islamic Republic, the 85% participation of the people has played a significant role in stabilizing the foundations of the nation's security. The government that been voted in by this enthusiastic and passionate majority appears stronger in the internal, regional and global sphere than before. This authority will manifest itself in the great capacity of this nation to solve internal and external problems, and in the daily promotion and growth of our dear Islamic country.

The disillusioned and pathetic enemy immediately went to work and by mobilizing propaganda and political elements created a chain of disturbances that led to riots and unrest in Tehran, where many were injured and suffered both financially and emotionally. According to gathered evidence and the confessions of the accused, these events were planned in advance and took place according to the schedule of the Velvet Revolution. More than 100 of the 198 steps in the Gene Sharp manual of instructions for velvet revolutions have already been executed.

Honorable Judge of the Court:

A Velvet Revolution is a type of overthrow which shares the same goals as a military coup d'état but differs in methods and means.

In this same vein, Robert Helvey, a retired CIA officer and a student of Dr. Gene Sharp, writes in his book (entitled *On Strategic Non-Violent Conflict: Thinking About the Fundamentals*): "Non-violent warfare (meaning Velvet Revolution) is no different from military campaigns, except that the weapons used are different and unique to this particular method."

Another difference between a military campaign and a Velvet Revolution is in the way [the latter] develops and forms from beginning to end, and the long time it takes to take form (which can sometimes last up to ten years).

The most important point that must be paid attention to in regards to the Velvet Revolution is that theorists hired by Western intelligence and espionage services apply this method according to the recommendations of their employers in order to overthrow independent regimes or systems that resist

Western hegemony, and in an effort to rid themselves of the impasse that exists in a world dominated by injustice. These methods are the result of years of research and field work conducted in various countries which foment coups. This method of overthrow has been designed such that it depends on supposed “civil” means and is conducted during a long period of time so as not to create alarm among the people and the political leadership of targeted nations. One after another, they have steadily and calmly taken the steps of a Velvet Revolution. The [targeted] political system usually realizes what is going on at a time when the Velvet Revolution has already reached its final stages, and the likelihood of its success has greatly increased.

For many years, numerous foundations and institutions have been created by spy agencies and Western government agencies, especially America. [These institutions] divide their institutional responsibilities and conduct focused missions that share the goal of making sure a Velvet Revolution takes place. The most important foundations include: the Open Society Institute and the Soros Foundations Network (OSI), The Rockefeller Institute, the Ford Foundation, the German Marshall Fund, Freedom House, Council on Foreign Relations, German Association for Foreign Policy, and the Institute for Democratic Studies in England.

It is necessary to further explain this issue by noting the statements of a spy who is now in custody, and who attempted to play a role in the tenth presidential elections. He says: “In a trip that I had to Israel I was introduced to an institute called MEMRI that belongs to the United States but is located in Israel, and works in the field of media studies in the Middle East. The goal of this institute is to fight against anti-Israeli activities that take place in other countries. This institute follows a project that seeks to support reformists in Islamic countries, including Iran. The person in charge is a former Israeli intelligence officer whom I met with once. He said that our goal is to promote the ideologies and thoughts of people such as Soroush in Iran.”

This spy continues: “Another institute active in the field of Iran is the SAE Dutch Institute of Hyves. I met with some of its leaders. This institute has a good relationship with NGOs inside Iran, and spent 10 million Euros towards the end of Khatami’s presidency in Iran. Most of the funding went to women’s rights movements. The Hyves institute funds its budget through bribes taken from Dutch oil companies who do not wish to pay taxes.”

The aforementioned spy also talks about the role of Radio Free Europe: “The website of Radio Free Europe, which like many other velvet revolution institutions began its work during the Cold War, is connected to the CIA. During the Cold War, the Americans wanted to put pressure on the Soviet Union and so they used cultural, political and media outlets and relied on attractive terminology such as “democracy,” “human rights” and “freedom.” Many of the institutions that are active in the area of velvet revolutions today are remnants of the Cold War, and Radio Free Europe is one of them. The Persian section of this radio operates under the name Radio Farda. This radio mainly covers what happens in Iran and is prone to exaggeration.”

This spy also talks about another institute, which is part of the velvet revolution movement, called the Berkman Center. He says: “the global voices project is part of the Berkman Center located at Harvard University. This project has started from 2004 and I participated in its first meeting at Harvard. The goal of this project is to focus on bloggers around the world, especially those from countries that oppose America, such as Iran. [They do this] so that they could implement their goal of creating psychological warfare in these countries. The Soros Foundation (OSI) provides funding to this organization and to many other organizations around the world. Ethan Zuckerman is the project manager. He is an American who has worked with the Soros Foundation before. He has lots of experience using the internet to bring about a velvet revolution in different countries, and he is in contact with U.S. intelligence and security services.

He continues: “The Berkman Center is run by John Palfrey, who has claimed that his uncle, Kermet Roosevelt, directed the 28 of Mordad coup.

The aforementioned talks about the role of the United States in the velvet revolution, and adds: “America uses different theoreticians such as Gene Sharp, who has spent fifty years of his life at his institution in order to develop methods aimed at targeting weaknesses in regimes vulnerable to velvet revolutions. Manuals and texts teaching non-violent opposition and struggle are available in 20 to 30 different languages on this institution’s website. Of course, these languages are not English, Spanish or French. Rather, they are in Burmese, Chinese, Arabic and Farsi ... America prefers that velvet revolutions take place in countries that speak these languages.

Other people such as Mark Palmer, head of the Konos Foundation, have also done a lot of research on Iran. They even held classes 2-3 years ago and they invited two of the 2nd of Khordad activists, including Emad Baghi, to teach them about the methods of a velvet revolution.

Honorable Judge of the Court:

Until now, a couple of the velvet revolution projects have succeeded in a majority of the countries in which they were implemented. In some cases, however, they were not successful. The countries that the velvet revolution has succeeded in are: Georgia, Poland, Czech Republic, Croatia, Serbia, Ukraine and Kyrgyzstan. In most of these countries, the velvet revolution took place under the guise of an election, and shares many similarities with the failed velvet revolution project in Iran (which took place and reached its final stages under the pretext of the tenth presidential elections). Of course, this conspiracy was crushed as a result of our people’s vigilance and persistence, and the strong response of the security and law enforcement apparatus.

In response to a question regarding the models and methods that America used to plan a velvet revolution in Iran, the spy said: “This model was based on the elections, and planning for it began at least 2 years before an election. They first start by planning and selecting their candidate. For example Mr. Saakashvili—the current President of Georgia—he is not someone who came into the political field overnight, he had a Fulbright scholarship (which is administered by the U.S. State Department). He had studied for years in that country and was being trained for such an event. After selecting their candidate, they heavily invest in him, such that supporters of the candidate begin to educate people via networks similar to business models such as the pyramid scheme (which are a proven way of attracting supporters in campaigns). Then they proceed to design a symbol, choose a color for their candidate, and begin manipulating the public so that it votes for their candidate. On the other hand, before the elections they prepare themselves so that if they should lose they can create doubt and allege that election fraud has taken place. So they can question the legitimacy of the government and initiate protests. In the end they either cancel the elections or hold another round of elections with the presence of foreign observers, which results in their candidate of choice getting elected.”

The aforementioned continues: “This process has taken place in Georgia, Serbia, Ukraine and Croatia and has succeeded. The important point here is that the same educational material used in Serbia was translated to Farsi, and with some minor changes was used in Iran. These changes were related to the traditions, cultural and social norms of the society. The most important agents of this revolution are the youth, whom they heavily invest upon. They depend on the energy of the youth, because they are the only group that can spend two to three months on the elections without having any income.”

He adds: “The velvet revolution in Iran is very similar to the velvet revolution in Serbia. In that country a group by the name *Otpor*, which was a student group, first began attracting members. [Their group] which shares many similarities with the Green movement in Iran. On the educational manual (which is available on the Albert Einstein website), there is a discussion about ‘difficult circumstance.’ This is one

of the most important strategic methods used, and it forces governments into a situation in which they cannot deal with protestors. In the discussion, it is recommended that protests take place under the guise of religious practices, or actions such as marching through the streets— actions which the government cannot prohibit one from engaging in. At the end of this educational manual, a couple of educational videos are mentioned which are about the revolution in Serbia. Some of the films have even been dubbed in Farsi and are available on the website.”

There is also another manual that discusses how to capture places and important buildings in the city, and instructs on how protesting groups can capture important city centers.

It is important to inform the court that the educational film on the revolution in Serbia has been translated to Farsi by a person named Nader Sedighi, and the film is edited and narrated in his voice. This person is the first individual who introduced Mr. Kian Tajbakhsh to Messrs Hajjarian and Tajzadeh. Regarding Mr. Sedighi’s role, Mr. Tajbakhsh says: “The role of Mr. Nader Sedighi, who introduced me to him, and who is responsible for introducing me to Messrs Hajjarian and Tajzadeh is unclear to me.” At the moment, the aforementioned location’s is unknown.

This captured accused, whose name we do not wish to reveal for security reasons, believes that a velvet revolution has three arms: an intellectual, media, and executive, and explains: “Each of the arms of the velvet revolution is connected to an American institution. In reality, a division of labor has taken place.”

In this regard he says: “In this triangle (intellectual arm, media arm, executive arm), each of the American institutions is responsible for a particular activity. In Iran, a group cooperates with them. The most important of these institutions is the Hoover Institute, which is based at Stanford University in California and was established during the Cold War.

This institution has a project named “Iran Democracy Project,” which operates under three security agents: Abbas Milani, Larry Diamond, and Michael McFaul. Abbas Milani was arrested during the reign of Mohammad Reza Pahlavi because of his activities in leftist groups. He later became a hardcore monarchist. After the Revolution, he lived in Iran for one or two years and then left the country for the United States, where he published numerous books praising the achievements of the Pahlavi regime. Gradually, he became one of the leaders of the opposition movement. He has one major difference with the other leaders of the opposition movement, and that is his connection with the reformists inside Iran.

This captured spy adds: “The “Iran Democracy Project” addresses common cultural issues for people such as music, blogs, and matters relating to the sexes.”

The student wing of this organization is very active, and people such as Fatemeh Haghghatjoo, Arash Naraqhi (from the circle of Kian and Soroush) make speeches at their conferences. Inside Iran, people who are close to Kargozaran-e Sazandegi party cooperate with them as well. For example, Atrianfar talks of Abbas Milani as a historian in newspapers or magazines he works for. Abbas Milani is more important than Reza Pahlavi for the CIA, because he has a good relationship with the reformists and provides financial assistance to Akbar Ganji outside the country.

PART III:

The Accused Know that the Allegation of Fraud in the Elections is a Lie

Fars News Agency: Referring to the confessions of a spy regarding the arms of the velvet revolution, the representative of the Prosecutor General said: Behzad Nabavi, Abtahi, Maziar Bahari, Mostafa Tajzadeh and Safaee Farahani have said in their confessions that no violations or rigging has taken place in the elections. Mousavi Khomeini had said we must insinuate foul play in order to prove cheating.

According to Fars News Agency's political reporter, the rest of the transcript of Abdolreza Mojtaba, the deputy Prosecutor General of the Revolutionary Courts in Tehran (and representative of the Prosecutor General), reads as follows:

The Arms of the Velvet Revolution in Iran

The aforementioned spy says the following regarding the arms of the velvet revolution in Iran: "The model that has been designed for Iran, like the other countries, has three arms: intellectual, media and executive. Each one of these arms has active subgroups. So for example, the intellectual arm has progressive, religious, progressive secular, capitalist, foreign policy, literature ... subgroups, and each of these elements have internal and foreign institutions that play an active role.

The executive arm of this project, or velvet revolution, has six subgroups:

1. The women's subgroup, which is composed of several different factions. The most important leaders of these factions are Mrs. Shadi Sadr and Mrs. Shirin Ebadi. These factions are mainly in touch with Dutch NGOs who finance the activities of these campaigns and groups. There is another faction under the leadership of Parvin Ardalan—daughter of Ali Ardalan, leader of the National Front. Nooshin Hamedani Khorasani is the leader of another faction which has leftist inclinations and is part of this group.
2. Ethnic-racial subgroup. Most of the work of this spectrum is done by Shirin Ebadi's faction. Although she works in the field of human rights, her work also involves ethnic-racial elements. The Religious-Nationalists also belong to this subgroup.
3. The human rights subgroup. The most important weapon that America uses in confronting its opponents is human rights. There are a couple of factions in this subgroup. Here, too, Shirin Ebadi is the most active agent. Hadi Ghaemi, who is an active security agent in America, is one of the foreign supporters of this subgroup. He is the head of the Iran section of the Zionist organization "Human Rights Watch," and with a 15 million euro budget he has established an organization in the Netherlands whose sole focus is human rights in Iran.
4. Labor subgroup: if you remember, in years past Bus Drivers Syndicate went on strike led by Mansour Osanloo. It is interesting that certain individuals, because of a delay in the payment of their wages, go on strike but do not realize that coup seeking organizations in America such as the NED, the National Endowment for Democracy and ... openly give millions of dollars to other organizations, which assist the Iranian syndicates. All the evidence for these donations is available on the NED website. It is presumed that one reason why this information is so readily accessible is [so that the aforementioned organization can pretend to be legitimate]. Many people believe that because [the NED] does not work secretly it does not have a particular agenda.
5. NGOs: this subgroup gained a lot of importance during the reform period. The West had reached the conclusion that NGOs had to be expanded in Iran, and was seeking ways to provide human, monetary and management resources to alleviate their weakened position. For this reason, institutions were established which were mainly based in the Netherlands. The responsibility of these institutions was to provide Iranian NGOs services such as training of personnel, acquisition

of funds from foreign countries ... Two prominent NGOs in the country are *Koneshgaran* (led by Sohrab Razaghi, Manager of NGOs in the Interior Ministry of the reformist government) which received two million euros from Dutch institutions, and the *Hamyaran Institute*, directed by Bagher Namazi. After the Bam earthquake in 2003, the *Hamyaran Institute* held a series of educational classes in Tehran, and focused on strategies to gather money from outside the country. The instructors included individuals such as Hadi Ghaemi, who has a Zionist history.

6. Student (university student) subgroup: The peak of the student movement's activities took place during July 9, 1999. The [movement was significantly] weakened afterwards. However, with the passage of time, the student branch (which is centered in *Tahkim-e Vahdat* (Allameh branch) and related branches played an important role for the executive arm of the coup plot. The Aghajari court, the letter to Kofi Annan, declaring the elections unlawful ... these were among the activities of this subgroup. The departure of people such as Mohsen Sazegara, Atri, Ali Afshari, and Reza Delbary to America, and their employment with institutions dedicated to overthrowing the Iranian Republic's regime is the best proof of the link between this subgroup and the velvet coup project in Iran.

The Intellectual Arm of the Velvet Coup Project in Iran

Regarding this matter, the CIA spy has this to say: "This arm is very important, and it can be said that the intellectual work begins before any action is taken, and that it takes many years for the other arms (media and executive) to begin their work.

The intellectual arm was established in Iran many years ago, from the war years. During this time, a new progressive wave came out of the Muslim movement. This movement was led by Abdolkarim Soroush and Kayhan (the cultural magazine). At the time Seyyed Mohammad Khatami was *Kayhan's* Manager.

In his first series of articles, Soroush focused on particular issues. For example, in his first series of articles Soroosh argued that there is no such thing as the West, and there is no need to focus on whether we are westernize. He also questioned the idea of resisting westernization, which was one of the important ideas coming out of the Revolution. They slowly targeted the cultural foundations of the Revolution and began destroying them. From that time, their intellectual discussions were marked by inept training and intellectual tyranny—something that they kept secret. If we assume that the West and tyranny do not exist, then revolutionary slogans such as "independence" and "freedom" will be rendered meaningless.

This process has continued, and has slowly attacked the foundations of the Imam's [Ayatollah Khomeini's] ideas—foundations such as the unity of religion and politics, the *Velayatih Faqih* (Guardianship of the Jurist). This is how they have prepared the field for Westernization and Americanization.

He continues: "Other people such as Sari-ol Ghalam, Naser Hadian, and Hadi Semati adopted particular thoughts, and began theorizing about how to reinforce American interests in Iran. They slowly began criticizing issues such as nuclear energy and support for Lebanon and Palestine. These theories were applied in different research institutions and the reformist government, and were widely distributed to society through the media.

Major Similarities Between the Failed Velvet Coup in Iran and Velvet Revolution in the Named Countries

- 1) A fraud plan aimed at eroding the people's trust and delegitimizing the firmly-based political system. In this regard, our wise Leader said, in the historic Friday sermon of 29 Khordad (June 19, 2009): "On March 21st, I warned in Mashhad that they will continue insisting that there will be fraud in the elections,

and that they wanted to prepare the field. At the time I pointed out to my friends inside the country that they should not repeat this statement— that the enemy wants it to seep into the people’s minds. The Islamic Republic’s system is trusted by the people. This trust has not been easily gained. It has taken thirty years for the Islamic Republic’s system, through its leaders, actions and many struggles, to gain the trust of the people. The enemy wants to take this trust away and bring doubt to people’s [minds].”

Unfortunately, some political movements, parties and activists pursued the idea that cheating will take place in the elections without heeding the warnings of the Supreme Leader. They pursued the idea that cheating will take place in the elections in conformity with our enemies. And they did it without presenting any proof or evidence.

One of the parties under consideration is the Mojahedin of the Islamic Revolution Organization, which repeated the possibility of fraud in the elections in its official statements and in comments made by its members months before the elections (and before and after the remarks of the Supreme Leader and his suggesting that we avoid working with the enemy.

In their statement dated April 10, 2009, in which they announced their support for Mousavi (and which came out only twenty days after the Supreme Leader’s warnings), they repeat the enemy’s words: “The legitimacy of the elections has been seriously jeopardized, such that there no way to trust election statistics gathered from the population of eligible voters, or the votes of the participants for the candidates.”

Of course, this organization had mentioned the issue of fraud in the elections, months before, in a resolution of June [August] 2008 during its twelfth congress. After the announcement and the Supreme Leader’s message confirming the election [results], this organization issued several statements, without any reason or proof, questioning the validity of the elections. For example, in their first statement after the announcement of the election results they stated: “We had no doubts about the existence of fraud and violations.”

Counterfeit Documents at Behzad Nabavi’s Residence and Election Headquarters

This movement, with its goal of suggesting that there were irregularities and fraud in the elections, fabricated a letter from the Interior Ministry. They did this with the intent to damage the ministry and deceive public opinion through widespread distribution [of the letter]. In addition, upon inspecting the house of Behzad Nabavi (an instrumental and effective member of Mojahedin Organization), documents revealing an intent to forge and create anxiety in the minds of the public were found. These documents will be attached and presented to the court.

It is noteworthy that these forged documents have also been found in the election headquarters of unsuccessful and opposition candidates.

Officially and in collaboration with enemy groups and media outlets that oppose the regime, the Islamic Iran Participation Front, Executives of Construction Party, and some members of the Association of Combatant Clerics also expressed doubt regarding the validity of the elections before and after the event.

This issue is important and significant for the court because the charge of election fraud was raised during the time of campaigning, which suggests previous planning with a particular goal in mind.

Second, this issue is the main cause of the chaos and rioting which led to so much financial and spiritual damage, including the loss of the lives of our countrymen. This despite the fact that the detained suspects have made clear in their confessions that they knew that fraud had not taken place, and that they merely intended to create doubt and spread rumors regarding election fraud.

Allegations of Fraud Prior to the Elections

Maziar Bahari, a reporter for the Newsweek weekly magazine in New York, has this to say regarding this matter: “The foreign media were covering the issue of election fraud even before the elections. In an interview with Mr. Khatami, I also asked this question from him. After the interview I realized that a movement following the classic model for a color revolution was taking place.”

Behzad Nabavi Discussed the Fraud

Mohammad Ali Abtahi, Chief of Staff for the previous President (who is now being detained), expressed some opinions regarding the issue of fraud: “The issue of election fraud in Iran was first discussed in 1997 (by the named person). The reformists started talking about this issue a lot afterwards and in the recent elections, Behzad Nabavi discussed this matter and was selected to be the Head of the Committee to Preserve the Votes in Khatami’s committee.”

Mr. Abtahi says: “Mr. Karroubi announced in a meeting with other reformists that we should not insist on the issue of fraud because by doing so we will erode the people’s trust and they will no longer participate in the elections. In that same meeting, Mr. Mousavi Lari declared that fraud will definitely take place in the elections.”

Mousavi Khoiniha Indicated that Alleging Fraud is Necessary for Cheating in the Elections

He continues by saying: “After [Mousavi] announced his candidacy, an election committee member (Mr. Mohtashamipour) discussed the fraud project. Both Mr. Mousavi and Mr. Mohtashamipour had strong opinions along these lines, and they established a Committee to Preserve the Votes. It is important to note that most of the reformists believed that no more than 2 or 3 million votes could possibly be fraudulent. In the next meeting, Mr. Mousavi Khoieiniha suggested that [they] must not let up on the issue of election fraud because [they] will need when it is time to cheat.”

Mr. Abtahi explains: “I believe that Mohtashimpour really damaged Mousavi. During the June 13th meeting he announced: ‘I have told Mr. Mousavi not to worry because we have so many documents on fraud that we can change the direction of the elections. Mr. Mousavi is easily manipulated because of his inexperience and absence from the political scene for years.’”

Abtahi, continuing his previous remarks, added “two days after the elections, I asked Mousavi Lari regarding fraud, and he answered that Mohtashamipour speaks nonsense, because changed votes for Mousavi would not be over 700 or 800 thousand votes.

Tajzadeh Knew They Had Lost the Elections Based on Provincial Estimates

Mostafa Tajzadeh, political deputy of the Interior Minister and head of the Election Board during the Presidency of Mohammad Khatami, is another one of the arrestees who believes that there was no possibility of fraud and cheating. He says: “There was no legitimacy to the allegation of cheating in the elections. As soon as the elections ended and I talked to people from the asked provinces, I had the feeling that we had lost. But I did not think the ratio was 3 to 1.”

Tajzadeh continued: “I should say this for the first time—when the results started to come in at 12 o’clock, I never said that cheating had taken place. The allegations they make have nothing to do with me and I was not involved, but of course my party has issued a statement and I should also be punished.”

Mostafa Tajzadeh adds: “I think this election is one of the most unprecedented and extraordinary elections. I believe the participation of 40 million will continue to occupy an important place [in the nation’s history].”

In addition, another one of the accused says: “During the Saturday meeting of June 13, 2009 at the campaign headquarters, Mr. Tajzadeh and several other reformist friends were present in Mr. Tajzadeh’s campaign headquarters and expressed great awe and surprise. I asked him two questions. The first question was: What is the situation with Mousavi’s votes? He said: “The voting situation for Mr. Mousavi is not good and Mr. Ahmadinejad will definitely win in the first round of elections. [My] second question [was]: Has election fraud taken place? To which he answered: “I have gotten in touch with all the provinces except for Ardebil. The announced results are not different from the results that we have and no fraud has taken place.”

Behzad Nabavi: We Do not Have any Evidence of Fraud but I will not Betray Mousavi Behzad Nabavi, member of the central council of the Mojahedin Organization, advisor to former President [Khatami], and vice chair of the Sixth *Majlis* (who is now in custody) said this about the fraud project: “We do not have any evidence supporting fraud in the elections and we must recognize the decision of the Guardian Council.”

When it was requested that Mr. Nabavi at least provide some sort of apology and explain his position publicly in connection with his misconduct, the situation he brought about as a result of his false election fraud scheme, his confession that [he] had no evidence to prove the fraud and that his false allegations caused great financial and physical hardship to our great people, he replied: “I will not betray Mr. Mousavi.” He was then asked are you willing to betray your people and the history of your country for the sake of not betraying Mr. Mousavi? He had no response.

Ramezanzadeh: Fraud is Not Possible in Iran

Ramezanzadeh, a spokesman for the Khatami government also said the following in connection with this issue: “I have always said, and my friends in the party also know, that fraud is not possible in Iran.”

Safa’i Farahani: Allegations of Fraud are Questionable

Mohsen Safa’i Farahani, a member of the central council and head of the Islamic Iran Participation Front, member of *Majlis* during its sixth session, and president of the Iranian Football Federation from 1998 to 2002, said this in his confessions: “There is no way to accept that fraud has taken place in this election. Even assuming that fraud took place, [it can only be around] one to two million votes.”

He also said: “It is a question for me as to why a person like Mr. Mousavi, whose activities during the Revolution are clear, who is a member of the Expediency Discernment Council—and people such as Mohtashamipour and Mousavi Lari, who have been ministers before, have such claims about fraud in the elections.”

Western Media Reporters

Mousavi’s claim of victory in the elections was based on the classic model of color revolutions.

It should be remembered that all of the accused claim, in similar statements, that there is no way that fraud took place, and there was no possibility of cheating.

Maziar Bahari, film-maker and reporter for foreign media, points to the role of foreign media in the election fraud scheme and points out that: “Foreign media had focused on the idea that fraud will take

place months before the elections, and they had prepared the field such that if their candidate of choice was not elected they would declare that a coup had taken place against the vote of the people. Some time ago, I had a discussion with one of the assistants of the West's preferred candidate and he also mentioned the fact that a coup had taken place."

In connection with his previous statements, Bahari adds: "In this regard, and before the final results of the elections became clear, Mr. Mousavi said the following (consistent with the classic model of color revolutions: "I am the winner of the elections, and if any result other than this is announced fraud has taken place."

The confessions of the accused and convincing evidence indicate that the election fraud program had been previously planned by political party members and activists with the goal of causing disturbance and chaos. This is one of the factors that was focused on in the velvet revolution, and is one the main reasons for the occurrences of disturbances and chaos. It must also be noted that in the discussions regarding fraud there was perfect coordination between the accused and their foreign counterparts.

2) Extensive use of illegal gatherings is the second similarity that the velvet revolution in Iran shares with the named countries. [These gatherings] take place with the goal of training and preparing for the capture of important government centers. These events have occurred in most velvet revolutions, but failed to succeed in Iran.

Gatherings in front of the Ministry of Interior, the Islamic Republic of Iran Broadcasting and *Majlis* occurred for this reason. According to the confessions of the accused, the numerous pictures that have been acquired from the event and those involved, the attacks that took place against the *Basij* defense precinct after the illegal June 15, 2009 march in Azadi square (and which was carried out with the use of weapons and firebombs) clearly reveal the organizational aspect of this pre-planned attack. The existence of backpacks full of stones and explosive bombs and [evidence] of grenades and other firearms in the aforementioned attack reinforces the validity of this claim, although it is necessary to point out that the demands of some of the protesters were unrelated to the coordinated activities of attackers.

Rostam Fard Tehrani, president of the Saham News website, says this about the goal of the protests: "The issue we were interested in bringing up during these elections was to declare, through these protests, that fraud had taken place in the elections."

He continues by discussing the way they disseminated information for these gatherings by saying: "We dispersed information about the time and place of the assembly through three different means: the internet, phone and email."

In comparing the activities that took place in the velvet revolution in some countries and what happened during the elections (such as building symbols, creating a human chain of supporters, [fabricating] a fraud scheme, announcing victory before tallying the votes, and gathering in front of important government centers with the goal of capturing them, Kian Tajbakhsh proves that there were plans for a velvet revolution in Iran as well.

Mr. Abtahi, too, in his declarations bearing on the pre-planned nature of the gatherings says: "The celebrations for victory or defeat, which resulted in rioting, were pre-planned. Bringing people to the streets, determining paths, bringing equipment and providing up to date reports on Facebook, were all matters that had been planned before the elections. They wanted to turn this election into a movement.

He continues by adding: "Friday morning, June 12th, a notification was posted on Mir Hossein Mousavi's Facebook page that his supporters would stay awake from this

evening to the morning. This was different from the symbolic issue raised by Karroubi.

After the initial results were declared, Mousavi's campaign immediately began to organize. In a telephone call to me, Tajzadeh said: "We intend to keep this population until the end of the elections, and we want to direct them to different parts of the city."

Abtahi continues: "I believe this movement has three angles: 1) the head; 2) the moving body; 3) a social network which is the most critical."

In explaining the "moving body" Abtahi adds: "Regarding the moving body, some had a more active role, such as the Mojahedin Organization, the Islamic Iran Participation Front, the coordinated groups around Khatami (i.e. the 88 group, Yari News, Pouyesh) ... other legal venues that would invite people to the streets, and foreign networks that would cover the news through their reporters. The important point is that foreign journalists had become very close to these men and were even closer to the coordinated groups."

Regarding the role of the moving body, he says: "The most important role of these elements was to keep people in the streets, so that in the event that Mr. Mousavi would declare his location they would go there. This organization was carried out by the coordinated groups."

At another point, Abtahi says: "Bringing people to the streets before the elections was a precondition to bringing people to the streets on Saturday night. People like Fateh, Tajzadeh, Khatami and his campaign, and Mehdi Hashemi and his people were very active so as to keep people in the streets. And all of them were involved in designing and planning the events of Saturday night."

At the end of this section it must be reminded that the role of foreign media such as BBC Persian, Voice of America, Al-Arabia, Radio Farda and Radio Zamaneh in informing and instigating with the goal of adding to the chaos, holding illegal gatherings, and rioting, is very significant.

In addition, we request that the honorable judge of this Court pay special attention to the important coordination between political parties, the accused, and the aforementioned media.

3) Creating a Culture, Networks and Institutions

According to the confessions of the accused and educational manuals, a velvet revolution takes place in three stages: 1) culture building, or in other words, manipulating ideas in favor of Western values; 2) institution-building patterned after NGOs; 3) network building by establishing links between NGOs.

Kian Tajbakhsh, one of the arrested suspects, who has been in Iran since 1998 as an agent of the Soros Foundation and is responsible for managing the clinical field of the velvet revolution, says: "Expanding the number of NGOs can only take place if the goal is to attract more supporters during times of crisis."

Mohammad Ali Abtahi, another one of the accused, confirmed Mr. Tajbakhsh's statements and says: "During the reform government two ministries, the Ministry of Interior and the Ministry of Culture and the National Youth Organization, took on the responsibility of licensing NGOs around the country."

As such, during the past several years tens of thousands of NGOs have been created and supported by the named Western organizations, both financially and morally. Even Shell Corporation, which is an oil company, has gotten involved in developing, educating, organizing and providing money to NGOs.

In this regard, NGOs, along with the unlawful Group of 88 (which has been established by the aforementioned political parties—Islamic Iran Participation Front, Mojahedin Organization, Executives

of Construction Party), was responsible for organizing and directing the illegal gatherings before and after the elections.

PART V:

The Efforts of the Islamic Iran Participation Front to Change the Nature of the Regime and the Meeting of an English Spy with the Reformists

Fars News Agency: The deputy Prosecutor General of the Revolutionary Courts in Tehran continues to discuss the role of some political parties and activists in bringing about a velvet revolution in Iran, and revealed the efforts of the Islamic Iran Participation Front to change the nature of the regime and set up a meeting between an English spy and reformists.

According to the Fars News Agency, the transcript of the indictment read by Abdolreza Mojtaba, Deputy Prosecutor General of the Revolutionary Courts (in his capacity as a representative of the Prosecutor General) is as follows:

Another Look at the Role of Some Political Parties and Activists in Planning a Velvet Revolution in Iran

Honorable Judge of the Court:

Noting what has been said so far, it is possible to distinguish the role of several parties (such as Islamic Iran Participation Front, the Mojahedin Organization, and the Executives of Construction party) in planning a velvet revolution in Iran, and explain these roles in ... in the presence of the Court.

1. Reviewing the actions of the aforementioned groups (including declarations of their positions in different national and international matters) in the form of statements and speeches made by their members, which were usually accompanied by pretense and intended to create anxiety in the public mind.
2. Secret decisions to overthrow the system in party meetings and gatherings.
3. Continuous and meaningful communication with foundations and organizations with regard to the velvet revolution.
4. Attracting foreign investment in order to establish NGOs, and expanding and network-building with the goal of using [these NGOs] as agents during the implementation of the velvet revolution.
5. Efforts to create a split leadership with many voices in the country for the purpose of creating a divide between the leadership and society.
6. Scheming to take advantage of the elections platform for the success of the velvet revolution and in an effort to change the structure of the country's system of government.

1) In its document outlining the party's political-institutional interactions (which was prepared for a five-year period in the fall of 2008), the Islamic Iran Participation Front reveals its goals for changing the nature of the holy system of the Islamic Republic. Despite the fact the authors of this document have tried to hide their true intentions through the use of reformist language such as "democracy" and "rule by the

people,” (i.e. the establishment of a secular government), they have not been [fully successful]. Page 8, section 4 of the document reads: “So that the democratic segment of the leadership will be able to use the crises that threaten the whole political system in favor of solidifying democracy and gaining more bargaining power.”

Can this sentence be deemed to be anything other than treason?

Of course, the entire content of the above document indicates that the Islamic Iran Participation Front sees the Islamic Republic’s system as despotic and anti-democratic, and with this assumption seeks to change the nature of it. In order to reach their goals, they have made plans, and concepts such as “economic and political freedoms” have been formed with these exact goals in mind.

With this explanation, I would like to draw the attention of the court to a particular section of this document on page 6, which reads: “During the first phase, the presence of pro-democracy agents will [need to take place] in the executive branch, the *Majlis*, and city and village councils, and during the last phase they will be better served if they are present on institutions such as the Assembly of Experts.”

Of course, those who prepared this document (which has been signed by the secretary general [of the party] and has the seal of the party in the next sentence) goes a step further and seeks to apply this change to the whole system, which means changing the nature of the system to a secular one. This is based on the evidence that during one of the meetings of the Supreme Council of the Cultural Revolution during Mr. Khatami’s presidency, he declared that “there is no escape from secularism.” This thought is affected by the same pseudo-scientific decision-making of the Center for Strategic Studies at the Office of the Presidency, which is led by Mr. Tajik (member of the central council of the Islamic Iran Participation Front). In a series of articles in *Rahbord* journal, Mr. Tajik develops a nonscientific conclusion, which he relays to Mr. Khatami: “In the near future, no one will be able to resist secularism, and we should submit with grace to this inevitable fate of humankind.” The invitation of Habermas in 2002 took place with this same goal in mind, and in a secret meeting which took place in Mr. Kadivar’s house (where Messrs. Hajjarian and Mohammad Mojtahed Shabestari were present) they discussed the process of secularization in Iran and presented new methodologies.

Mr. Jurgen Habermas returns to his country having gained confidence through his correspondence with reformists in Iran that the process of secularization is on firm ground.

In addition, the trip of Mr. John Keene in 1999 and his meeting with prominent reformist followed a similar pattern.

2) In one of the many meetings between reformist members of the *Majlis* (which exists in the aforementioned document), there is a very frank discussion regarding the ways in which reformists could attract the support of the European Union to their advantage when it came to internal political rivalry. The European Union’s defense of the sit-in of *Majlis* members during the sixth session of parliament clearly indicates that the above stated goal had been reached.

3) The suggestion of Behzad Nabavi regarding the establishment of an anti-despotic party which welcomes all members of the opposition.

4) The suggestion that the regime is anti-democratic, which is demonstrated in the expressions and pronouncements of the aforementioned parties and their members.

5) According to information acquired from reliable sources in connection with a meeting of the Mojahedin Organization’s Isfahan branch, a poll was taken where they asked whether, in the event of an American attack, [the individual] would give up the Supreme Leader to the attackers. [The answer

required a 'yes' or 'no.' It should be noted that these branches do not act on such matters without communicating with the central council.

6) In the Islamic Iran Participation Front's Arak branch, a similar event took place, and one of the leaders of this branch made a speech whereby he declared that if America attacks Iran [they] would kill the leaders of the Islamic Republic with our own hands.

7) The anti-religious opinions and positions of members of this organization in the past years, for which documentation is available, became so harsh that the late Ayatollah Meshkini declared this organization to be illegitimate and said it is corrupting the youth.

8) The issuance of statements damaging to the regime, and the focus on gathering signatures for open letters to members of the regime, especially the Supreme Leader. In one of these letters, they ask the Leader to drink the cup of poison for the sake of the system.

9) The central role of members from Islamic Iran Participation Front, Mojahedin Organization, and the Executives of Construction party in planning, organizing and directing the disturbances and illegal gatherings surrounding recent events.

It brings us to this conclusion that the aforementioned groups, whether they are in power (such as during the reform period when they were in charge of two branches of government) or not, will continue with their mischief and attempt to change the nature of the Islamic Republic's.

PART VI:

Some of the Arrested Monafeqin (People's Mojahedin of Iran) Received Training in Camp Ashraf

Fars News Agency: The deputy Prosecutor General of the Revolutionary Courts in Tehran continued to point out the role and charges of some agents in the field for the velvet revolution, and said: "According to the confessions of the arrested members of the Monafeqin group in connection with the recent disturbances, these people have received training outside and in Camp Ashraf in order to create destruction and terror, and they worked in an organized manner.

According to Fars News Agency, the transcript of the indictment read by Abdolreza Mojtaba, deputy Prosecutor General of the Revolutionary Courts prosecutor of Tehran (in his capacity as the representative of the Prosecutor General) is as follows:

Honorable Judge of the Court:

What has been communicated was a summary report of the actions of the internal planners and directors of the failed velvet coup project. In the second section, the actions and charges of agents within the field will be discussed:

Fighting with God and Spreading Corruption on Earth Through Efforts and Effective Actions Aimed at Promoting the Goals of the Terrorist Monafeqin

Some of the arrested suspects who have a history of criminal conviction and were members of the Monafeqin group have been arrested in this act of sedition. In his confession, one of them says: "I became interested in the Monafeqin in 1990, and my first serious move was to join the military wing in 2004. In

that year, I participated in bombing a sensitive place in Tehran. Then I expanded my efforts by distributing flyers and gathering and relaying information to the Monafeqin Organization. Until the elections, at which point I began participating in the protests and unrest in its aftermath. The police arrested me when I was throwing cocktail Molotovs at one of the government buildings.”

The Mission of a Member of the Monafeqin Response for Active Participation in the Rioting

Reza Khademi, who goes by the alias “Habib, the son of Abbas,” is accused of mediating for the Monafeqin terrorist group, and as such [is charged with] attempts against the national security of the Islamic Republic of Iran.

He is also charged with recruiting members for the Monafeqin and sending them to Iraq. The accused also engaged in different propaganda measures, such as releasing balloons in the air with the image of leaders of the Monafeqin, and pasting posters around Tehran.

He was in communication with Naser Abdolhosseini, Mohammad Nouri and Hossein Shirmohammadi, and attempted to secretly collect information and reports on disturbances after the election, and attempted to participate in the illegal demonstrations.

The Arrest of a Member of the Monafeqin while he was Throwing a Molotov cocktail at the Security Forces

Ms. Ozra Sadat Ghazi, “daughter of Hasan,” has a history of criminal conviction and membership in the Monafeqin Organization.

She is accused of fighting with God and sowing corruption on earth by being an active [member] and working towards fulfilling the goals of the Monafeqin Organization.

The accused was arrested at the scene while she was committing a crime—throwing a Molotov cocktail. She was identified as a member of the Monafeqin Organization and one of the main participants of the riots.

The accused participated in the 2004 bombing in Tehran, and during the recent elections she distributed flyers about the Monafeqin and gathered and relayed information to the Monafeqin terrorist group.

Her political and party history include her confession to membership in the Monafeqin Organization in 2000. It is clear that she worked to realize the goals of the Organization.

The Presence of a Monafeqin Member in the Campaign of Mr. Karroubi, and the Collection of Information for the Monafeqin

Naseh Faridi, “son of Ahmad,” was in contact with the Monafeqin group by phone and internet. Later, by actively participating in student and syndicate gatherings, he began sending pictures, news and videos to the Monafeqin group.

The aforementioned was also responsible for collecting information about any imprisoned member, and communicating that information to their family members and to the Monafeqin Organization.

He participated in illegal protests and encouraged students to attend, and [later] sent the gathered information to the Monafeqin Organization.

In addition to contacting the families of imprisoned members and conducting interviews with them, he sent the tape of the interviews to Voice of America, Simay-e Azadi, and Radio Farda.

He also put the family of Shabnam Madadzadeh, member of the Monafeqin, in touch with the leadership of the Monafeqin.

The aforementioned was also present in Mr. Karroubi's campaigns.

The Arrest of Members of the Monafeqin in an Organizing Meeting of the Rioters

Mr. Amir Hossein Fotoohi, "son of Hasan," is an active agent of the Monafeqin who participated in the recent unrest and had an effective role. He was arrested in an organizing meeting of the group.

Mr. Mahdi Shirazi, "son of Ahmad," is another one of the members of the Monafeqin who was arrested in the meeting organizing the members to further escalate the unrest and disturbances.

Cooperation and Communication with Members of the Monafeqin During the recent Disturbances

Mr. Hesam, "son of Mohammad," is accused of communicating with Mr. Ziya Nabavi, an agent connected with the Monafeqin inside the country.

He is also in close contact with members of the Council of Students Deprived from Education. This council is under the leadership and protection of the Monafeqin. The accused was a participant and agitator in the unlawful gatherings after the elections, and transmitted news and information about the elections through Majid Dari (who is one of the leaders of the Monafeqin inside the country) to foreign media.

The Actions of a Terrorist Network Connected to U.S. and Israeli Security Services Before the Presidential Elections

One of the members of the aforementioned terrorist network is Mohammad Reza Alizamani, "son of Ismail," who has a history of criminal conviction, swindling, and forging the seals of the Sepah, Judiciary and the Ministry of Justice.

The accused person, along with Hamed Roohinejad and Ahmad Karimi, took a trip to Iraq in 2006 and initiated an organizational relationship with U.S. and Israeli forces.

The accused held many meetings in Dehook-Irbil in the Rabiye region on the border of Syria and Suleymania with U.S. forces. After receiving money from them, they returned to Tehran to continue their mission. Some of the most important missions of the accused and his accompanying team included the terror of one of Paveh city's officials, gathering information about Basij forces in Tehran, fuelling protests, garnering explosive bombs, selecting political and religious centers for future targeting, gathering information about the structure of the Revolutionary Guards, determining a plan for the smuggling of firearms from Kurdistan in Iraq, gathering information about the Imam Hussein garrison, conducting terrorist activities in the Tehran Mosalla during the Eid Fitr prayers, and coordinating intelligence actions in connection with explosions at religious centers in 2008.

Other missions of the accused (who was arrested before any action took place) included planning to bomb polling stations, taking action to undermine the security of the nation, and fuelling unrest and chaos.

PART VII:

Cooperation with American Forces in Order to Create Unrest in the Country

Fars News Agency: Cooperation with American forces to create disturbance in the country, planning to bomb polling stations, efforts to bring the Liberation Movement of Iran to power, communication with foreign media and networks, and the dissemination of pictures and information to further incite the agitators are among other charges of those accused of the velvet coup.

According to Fars News Agency, the transcript of the indictment read by Abdolreza Mojtaba, deputy Prosecutor General of the Revolutionary Courts prosecutor of Tehran (in his capacity as the representative of the Prosecutor General) is as follows:

Cooperation with American Forces to Create Disturbance in the Country

Mr. Ahmad Karimi, “son of Mahmood,” member of another terrorist network connected to U.S. intelligence services, who along with two of the other accused (Hamed Roohinejad and Mohammad Reza Alizamani) left the country illegally to Suleymania in Iraq to meet and receive mission details from American and Israeli officials.

The named suspects, in addition to communicating with American generals and holding several meetings, declared his readiness to take any action against the Islamic Republic of Iran. The accused and his accompanying team, after receiving the necessary support (which included money and communication devices), returned to the country to carry out terrorist activities including bombing religious and government sites, collection of information from military bases (such as the Revolutionary Guards and Basij), and preparation of a chart regarding military forces in the country.

The named suspects, along with other members of the network, had planned different missions in order to create chaos and insecurity during the elections. They were, however, arrested before any of their plans came to fruition.

Entry into the Scene of Chaos after the Elections

Hamed Roohinejad, another member of the terrorist network, had lived in Iraq for a year and a half. In the last months of the previous year he received orders from his American officer to come to Tehran and to create chaos and unrest in the elections by planting bombs. He was, however, arrested before succeeding in his plans (which have been included as a part of his case file).

The Plan to Bomb Polling Stations

Amir Reza Arefi, “son of Ahmad,” another member of this network, has been in touch with a person by the name Foroud Fouladvand, who was, in turn, in touch with U.S. intelligence services.

The aforementioned, in cooperation with another one of the suspects, attempted to make a powerful firebomb. He tested its strength in a series of experiments carried out in field surrounding Tehran.

The aforementioned had prepared a film of their tests and had sent them to the U.S. They declare their intent to plant a bomb at the Imamzadeh Zayd (located in the bazaar), at the Imamzadeh Ali Akbar in Chizar, at the Hosseinyih-e Fatemyoon in Mojahedin Islam street, on a tanker truck carrying gasoline (which involved crashing the tanker into a gas station in front of Majlis, at the Hosseinyih-e Shahrak Valiasr, and in the Shrine of Imam Khomeini).

After receiving approval from their liaison officers, the accused began making highly explosive bombs to plant in the Hosseinyeh-e Ershad and Masjid al-Nabi polling stations. [It was anticipated] that the explosion on election would not only injure and kill many innocent civilians, but would also disrupt the election process. In the end, however, the suspect and his team were arrested and detained by the anonymous forces of Imam Zaman.

Efforts to Weaken the Islamic Republic's Regime and Bring the Liberation Movement of Iran to Power

Mr. Emad Baharvar, son of "Mohammad Hossein," is responsible for the youth branch of the Liberation Movement group and is also a member of the group's political office. The aforementioned was charged with influencing the 88 Group and the campaign to support Mousavi, and to transmit the ideas of the Liberation Movement to these groups.

Among his activities was the establishment of the Mousavi youth headquarters in Qeytariyeh, holding three-pronged meetings of the Mousavi campaign, organizing the staff of the 88 Group in the provinces, coordinating the Liberation Movement's activities in the provinces with staff, and publishing and disseminating election material.

The meeting of the youth branch of the Liberation Movement (which was accompanied by Amir Khorram) with members of the central council of the Liberation Movement (with Ghorban Behzadianejad, Chief of Mousavi's campaign) for the purposes of cooperation and coordination of their actions took place through the work of this suspect. The [suspect created also] a commercial supporting the Mousavi and Karroubi campaigns, placed the Liberation Movement's insignia on it, and with the financial support of an unknown person released the video in high volumes.

By making false statements and posting articles and interviews in newspapers and news sites, the aforementioned sought to cast a shadow on the current situation in the country, destroy military plans, create anxiety in the public mind, spread libel and slander against the organizers of the elections, and increase dismay and disillusionment inside the country by repeating false claims about the actions of the government.

The suspect also had a strong role in starting an internet-based channel called "The Wave in Qheydariyeh" during the elections.

He states that his goals behind his actions were to spread secularism, weaken the hold of the system of the Islamic Republic, and empower the Liberation Movement.

Communication with Foreign Media and Channels and Dissemination of Information and Pictures Designed to Further Incite the Agitators

The dissemination of news, reports, pictures and videos to foreign media (from the scenes of unrest and chaos) are among the other charges of the accused.

These people played an important role in inciting and provoking public opinion by sending pictures and videos of the recent agitations to foreign media channels, especially to Iranians living outside Iran who work against the holy system of the Islamic Republic. The accused acknowledge that by receiving money from foreign sources they established headquarters for teams and individuals, and sent pictures and videos using high speed internet.

Among the pictures and videos there are many scenes of distraught faces from inside country, suggesting to viewers that the agitators are the people of Iran who have come to the streets in protest of the elections.

Majid Saeedi, “son of Naser.” is one of arrested photographers who says: “I attempted to take illegal pictures of the unlawful protests held at Enghelab square, Azadi square, Haft-e Tir square, Vali Asr square, and Baharestan square. And then I sent these pictures (via the internet, which was available in a house in Haft-e Tir square) to the antirevolutionary group *Marzeh Por Gohar* in the United States, the Getty Image Agency in the U.K., and the SIPA office in France.”

In addition, the aforementioned confesses that based on a contract he had with Getty Images, he was to receive \$225 per day for the pictures that he sent from the post-election riots. The accused photographer had no license to take pictures of the protests and was cooperating with foreign sources.

Another one of the accused, Satyar Emami, “son of Abodl Samad,” explains his actions which threatened the national security this way: “At the request of Alfred Yaqoubzadeh, a photographer at SIPA France, I participated in the illegal protests of 18th of Tir in Enghelab square and sent the pictures of the gathering that same night to France. The next day, those pictures were published in anti-revolution journals and sites for the purpose of inciting the agitators and threatening the security of the system.”

Among the other charges against Satyar Emami are taking pictures from military posts and nuclear facilities and sending them to foreign countries. In this regard, he says: “IN return for the 1000 euros I received from Alfred Yaqoubzadeh, I took pictures of the Bushehr nuclear facility and sent them to France.”

Maziar Bahari, another one of the suspects, says in his confessions: “In the ensuing unrest following the elections, I wrote two articles for Newsweek in which I defended the agitators and protestors and attacked the Islamic system. For my activities with Newsweek, I received \$200 per day. In addition, after I sent a film showing attacks on Basij bases on Mohammad Ali Jenah street, the U.K.’s channel 4 agreed to pay me 2100 Pound for the two minute film reel.”

In addition, Mohammad Rasouli, “the son of Hossein,” who was arrested while filming the illegal gathering in Azadi square, says: “I actively participated in the gatherings and riots after the elections. One of the main reasons for my participation was that I wanted to capture videos of the protests and send them to foreign media such as BBC. In some cases, the films I sent were broadcast from BBC.”

Participation in the Unlawful Gatherings with Weapons and Criminal Equipment

Alireza Eshraqui, “son of Mohammad Javad,” who was arrested by security forces while setting fire to and destroying banks and public places on Karim Khan Zand street, says the following in his confessions: “I participated in all the post-election protests with a knife and weapon. During the first day of the protests, I attempted to build a weapon that I could use to break the cameras of the banks and government buildings. Of course, I succeeded in doing this. I built a bow and used nails used for shoes as my arrows, and targeted the closed circuit cameras of banks. I also shot at the security forces in order to injure them.”

PART VIII:

THREATS TO THE NATIONAL SECURITY THROUGH SOCIAL UNREST AND COLLUSION

Fars News Agency: other charges against the suspects include threats to the national security through social unrest and collusion aimed at disrupting public security, participating in riots, and

dissemination of CDs and posters aimed at inciting, hitting and injuring police, and carrying and throwing grenades.

According to Fars News agency reports, the construction and use of home-made grenades while wearing Revolutionary Guard uniforms, defying and attacking security forces while they were on duty, involvement in the disturbance that took place in the university dormitories, providing refuge to unruly agitators amidst the turmoil, threats against the national security of the country through collusion and disruption of public security, being participating in riots, dissemination of CDs and posters aimed at inciting, threatening the national security by carrying and throwing grenades, are the last series of charges in the indictment presented by Abdolreza Mojtaba, deputy Prosecutor General of the Revolutionary Courts prosecutor of Tehran (in his capacity as the representative of the Prosecutor General).

The Construction and Throwing of Home-Made Grenades while Wearing Revolutionary Guard Uniforms

Mr. Meysam Ghorbani, “the son of Hojjatol-Allah,” who is one of the accused in the post-election disruptions, says the following in his confessions: “In order to create chaos in the street gatherings, I decided to acquire the material needed to make a home-made grenade. I succeeded. After making the grenades, I used them in the street protests, but because I was worried about being identified while carrying a grenade I decided to get a hold of a Revolutionary Guard uniform so that I could carry out my mission.”

Defying and Attacking the Security Forces While they Were on Duty

Mr. Hossein Bastaninejad, “the son of Sharif,” one of the accused arrested in the street riots says: “In terms of political affiliations, I supported the Tudeh Party. The street gatherings provided an opportunity for my participation. I was present in most of the illegal protests as one of the agitators, and participated in attacking the police and Basij forces.”

Arrest of the suspect took place when pictures of the accused throwing stones at the security forces were broadcast through the Islamic Republic of Iran Broadcasting. With the help of local intelligence, the suspect’s hideout was revealed to security forces and he was arrested.

The names of the rest of the suspect who have similar charges is included in the case file.

Attack on Military Bases with Explosives in an Attempt to Create Seditious and Riots

Mr. Mahdi Fattahbakhsh, “son of Hadi,” who was arrested while committing a crime says: “During the illegal gathering at Azadi square, I attempted to throw rocks at the security forces and attempted to attack them. Then, along with other agitators, we moved towards one of the Basij bases and by throwing explosives and fire bombs we set fire to the Thamenel ol-Aemmeh base section 115 of Laylatol Ghadr. I was arrested while committing the crime.”

Among the accused, Mr. Mousavi Shahkarami, “son of Ibrahim,” has threatened the national security by throwing stones and Molotov cocktails at security forces.

In addition, Mr. Amir Shenavar, “son of Khalil,” who has a history of criminal conviction, attempted to throw stones and rebel against security forces who were on duty. The suspect, who under the influence of messages from foreign media, attempted to damage public and private property in order to disrupt the security of the city and the country.

Discovery of Several Colts, Bullets and Documents Revealing Communication with Foreign Countries for the Purpose Working Against the Islamic Republic

In the office and home of Mr. Mohammad Ali Dadkhah, spokesperson for the illegal Center for the Defense of Human Rights (which played an important role in the postelection chaos), two colts along with many bullets, drugs, documents revealing ties with foreign countries for the purpose of creating chaos, and documents and notifications revealing orders for riots and protests were found.

The Incident at the University Dormitories: An Opportunity for the Participation of Agitators

The bitter events that took place before and after the elections are due to the presence and action of unruly elements. In projects put together by disrupting elements, the universities and dormitories [play an important role]. The planners and directors of the velvet overthrow project understood the emotional connection that exists between the people and university groups and decided to radicalize the street movement.

Undoubtedly, the events at the university should be seen as a premeditated incident in which a group of ignorant and deceived individuals played a role. Members of the *Fedaian-e Khalq, Tahkim-e Vahdat*, Pan-Turkists, and some members of the Islamic organizations of universities in Tehran (and other unruly elements) participated in this event.

A review of the reports and statistics of the beaten and injured lying on hospital beds reveals that the planners and agents of this disruption and sedition project were willing to sacrifice the innocent lives of the children of this land in order to achieve their goals.

Threats Against the National Security of the Country Through Collusion and Public Unrest in order to Threaten Public Security

-Mr. Omid Jafarabadi, “son of Abbas,” who has a history of criminal conviction, attempted to attack the security forces in addition participating in the riots.

-In addition, Mr. Mohsen Jafari, “son of Mohammad Hasan,” who has two criminal convictions on his record related to drugs, attempted to threaten the national security through disruption and collusion. The accused threw stones at officials and shouted slogans against the Islamic Republic. He also set fire to public and private property.

-Mr. Hamed Makarianvar, “son of Hamid,” who is addicted to drugs, also threatened the national security by participating in illegal gatherings and riots.

-In addition, Mr. Farshid Ghodrati, son of “Ali Akbar,” Saeid Pourazimi, “son of Hasan,” Rahim Hemmati, “son of Jamshid,” Ehsan Honarkar, son of “Reza,” Farshid Karimi, son of “Ali,” Meysam Saber, “son of Mahmoud,” Alireza Gharib, son “Ismail,” Akbar Ghodrati, son of “Baratali,” Mohammad Hossein Kooshbaghi, “son of Ali Akbar,” Adreen Kesheekian, “child of Rostam,” Abbas Golzarnia, “son of Ghasem,” Sahand Sabernejad, “son of Mohammad Hossein,” Hossein Afshari, “son of Hasan,” Seyyed Hadi Shahvelayati, “son of Ahmad,” Mohammad Ghanbari Varnekashi, “son of Naghdali,” Mehran Ahmadian, “son of Sadegh,” Saeid Ghorbani, “son of Gholamreza,” Ahmad Sharifian, “son of Abdollah,” Asghar Moshiri, “son of Hosseinali,” Farzin Hadipour Abkenar, “son of Faramarz,” Naser Abdolhossein, “son of Gholamreza,” Hamid Salahi, “son of Reza,” Mohsen Shekari, “son of Panjali,” Alireza Ghaderi, son of “Fazlol-Allah,” Ramin Satkin, “son of Adel,” Amir Rajabi, “son of Shabanali,” Afshin Khosravipour, “son of Hossein,” Seyyed Ali Seyyed Zadeh, “son of Jalal,” Mohammad Nikzad, “son of Ahmad,” and Ms. Maedeh Sadat Zakariaei, “daughter of AbolFazl,” all of whom have a history of criminal convictions and participated in illegal protests, disrupted the public peace and security, participated in illegal propaganda against the Islamic Republic, suggested fraud (which caused the people to lose their trust in the government and leading officials), and acted against the national security.

Participating in Riots and Disseminating CDs and Posters

Mr. Iman Sohrabpour, “son of Kavus,” participated in illegal gatherings, sought to give away CDs of protest, and caused agitation among the people.

The other suspect, Mr. Saeid Sepanlou, “son of Abolfazl,” who has a criminal record, participated in the protests and distributed CDs and flyers.

In addition, Mr. Hamid Reza Bakhtiari, “son of Ali,” participated in illegal gatherings and held placards inciting others to participate in the protests too.

Another suspect, Mr. Abbas Yousef Shahi, “son of Azim ol-Allah,” carried and distributed illegal flyers aimed at created chaos.

Mr. Morteza Bitaraf, “son of Rahim,” participated in the protests and filmed the events in cooperation with foreigners.

Attempting to Hit and Injure Security Forces while They Were on Duty

Mr. Mehرداد Varshooyi, “son of Nasser,” who has a criminal record, attempted to hit and injure a member of the Basij militia at Azadi square. Images of the accused have been broadcast by different media sources.

In addition, Mr. Faramarz Abdollahnejad, “son of Rahim,” participated as one of the rioters and attacked security forces at Azadi street. An image of the accused was published in the media.

Threats to National Security by Carrying Grenades

Ms. Ziba Askari, “daughter of Yadollah,” carried a grenade in the illegal protests at Azadi street.

In addition, Mr. Mohsen Abbasi Montazeri, “son of Mozaffar,” along with Ms. Ziba Askari (who participated in the illegal protests) also cooperated in carrying the grenade.

Participating in Damaging and Setting Fire to Public and Private Property

Mr. Kamran Jahanbani, “son of Mahdigholi,” confesses to setting fires on sidewalks.

Mr. Mahdi Moghimi, “son of Ali,” who has two counts of criminal conduct, was present as one of the agents responsible for setting fire to public and private property. The pictures of the accused were broadcast as he was setting fire to public and private property.

Mr. Ali Safai, “son of Yadollah,” who resides in the U.S., participated in the protests and was also involved in setting fire to a city bus in Lorestan street. In addition, drugs including crystal meth and alcoholic beverages were seized from his house.

Disrupting Public Safety Through Disruption and Chaos

Mr. Ramin Tofiqh Qhazvini, “son of Mansour,” who is Baha’i and participated in the protests, attempted to create disruption and fear.

In addition, Mr. Farid Ahmadi, “son of Jalal,” who has a criminal record and also participated the in July 9, 1999 demonstrations, is likewise involved in creating disruption.

Mr. Akbar Ajdadi, “son of Ali,” who was carrying crystal meth while participating in the protests, attempted to attack security forces.

Also, Mr. Hesam Tarmosi, “son of Hamid,” participated in the illegal protests and threw stones at security forces.

Farnaz Farhadpour, “daughter of Abdol Hossein,” participated in the illegal protests and attempted to throw stones at security forces.

Masoud Shemirani is another one of the accused who by participated in the illegal protests and attempted to throw stones at security forces.

Participation in Illegal Propaganda, Including an Invitation to Sit-in and Strike

Mr. Ali Mohaddes, “son of Ahmad,” participated in illegal protests and invited professors at Tehran and Amir Kabir University to stage a strike and participate in the illegal protests.

Participating in Propaganda Against the Holy System of the Islamic Republic by Participating in Illegal Protests and Sending Pictures and News About the Disruptions to Foreign Countries in Order to Strengthen the Enemy

Ms. Kiana Saeidfar, “daughter of Ibrahim,” participated in the illegal gatherings as one of the agents of chaos, and transmitted news to foreign satellite channels.

Mohammad Darmanaki Farahani, “son of Abbas,” is accused of offending the leaders of the system, inciting public opinion, inciting those participating in the protests, directing the agitators in the form of chanting slogans, and communication with foreign channels and media by sending pictures and news.

The aforementioned was in touch with individuals in America, Italy, Canada, Germany, and Turkey, and sent them information about the unrest.

Mr. Mahdi Moghimi, “son of Mohammad Hossein,” participated in the protests and attempted to film the disruption.

Ms. Sara Abhari, “daughter of Mohammad Javad,” who works at the Office of the United Nations in Tehran, took pictures of the riot scenes while carrying the flyers of the Islamic Iran Participation Front and anti-revolutionary groups.

The other accused, Mr. Shahour Saba, “son of Mohsen,” participated in the protests and began to take pictures of the unrest.

Mr. Mohammad Soleimanpour, “son of Nosratollah,” participated and invited others to the protests. He then began to take pictures with certain goals in mind.

Honorable President of the Court:

After describing the conditions of the recent conspiracy and sedition, including the planners, inciters, organizers, liaisons with enemy and anti-revolutionary groups, and the involvement, support, and direction of foreign intelligence services, in addition to the damaging actions of unruly and wily

individuals, I would like to ask you to announce the individual indictment of each of the accused in this case by stating their charges and the evidence against them so that we may issue a suitable sentence according to articles 500, 610, 618, 677, 687 and 689 of the Islamic Penal Code.