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New York City Bar Association Statement On the U.S. Military Action Against Iran

On February 28, 2026, the United States joined Israel in initiating a large-scale military operation against Iran without required authorization from Congress or from the UN Security Council.[1] In the ensuing weeks, the war has spread through much of the wider Gulf region. The City Bar condemns the unlawful use of force, expresses grave concern over the escalating hostilities in the Gulf region and calls for immediate compliance with constitutional, statutory and international law governing the use of armed force. The City Bar calls on all parties to the conflict, including Iran and Israel, to comply strictly with international law, including international humanitarian law, and to refrain from actions that risk further harm to civilians**.**

The Initiation of Armed Conflict

"War necessarily is a calculated series of killings, of destructions of property, of oppressions. Such acts unquestionably would be criminal except that International Law throws a mantle of protection around acts which otherwise would be crimes, when committed in pursuit of legitimate warfare," observed Justice Robert Jackson in his final report to President Harry Truman following the successful Nuremberg Tribunal. Two generations later, Jackson's stark words resound. Because the initiation of war is a choice with gravely destructive consequences, law and prudence dictate that the decision follow careful deliberation and specific Congressional approval to establish its legitimacy. That has not been the case in the U.S. war with Iran.

The legality of the use of force does not depend on the perceived character of the government against which force is directed.[2] Iran's government has committed grave and systemic human rights violations, including unlawful killings, discrimination against women and minorities, suppression of fundamental freedoms and support for international terrorist activities. Over the past 25 years, the City Bar has provided sustained support for human rights defenders and advocates in Iran, including calling for the release of those imprisoned by the regime for their activities.[3] We have condemned the violation of rights of sexual minorities[4] and attacks on the

independence of the legal profession,[5] and last year sponsored a public forum on the dangers to practicing lawyers in Iran.[6] In all these statements and programs, the City Bar has consistently defended the international rule of law and the rights of the people of Iran to human rights and dignity. The Iranian government's abuses have rightly been condemned by the international community and have resulted in sustained multilateral and unilateral sanctions. Concerns regarding Iran's nuclear program have been the subject of diplomatic efforts reinforced by punishing sanctions. None of these considerations, however, provides a lawful basis for the use of force by the United States outside the bounds of applicable legal frameworks. Rather, the current conflict violates both the U.S. Constitution and the international law governing the use of force.

The scale and scope of the U.S. military operations undertaken demonstrate that this use of force amounts to war within the meaning of the U.S. Constitution.[7] The Constitution vests in Congress, not the President, the authority to decide if our nation should wage war. It does so for important prudential reasons.[8] While Congress has issued formal declarations in only five wars (in eleven separate enactments), constitutional practice since World War II has given practical effect to this power through statutory authorizations to use force — most recently in the 2001 Authorization for Use of Military Force (AUMF) following the 9/11 attacks and the 2002 Iraq AUMF.[9] Absent Congressional authorization, the President, as Commander in Chief, possesses only a narrow range of unilateral authority to act in cases of national self-defense: responding to armed attacks and using force against imminent threats that are immediate and necessary, and allow no alternative means.[10] The March 2 letter from President Trump to Congress – sent to meet the War Powers Act requirement to inform Congress of such lawful uses of force in self-defense – does not meet these narrow constitutional exceptions. It fails to describe any imminent threat to the United States or its forces or satisfactorily address why the attack was carried out without prior Congressional authorization.[11] In all other circumstances, the President must receive prior authorization from Congress. Recent presidential decisions to use force in these narrow circumstances, or to recommend to Congress that it authorize the use of force, have also included analysis of compliance with the UN Charter's prohibition on the threat or use of force except in self-defense or as collective security authorized by the Security Council, typically conducted through the interagency legal process with the Senate-confirmed State Department Legal Adviser playing a central role.

The requirement of Congressional authorization to use force serves a crucial deliberative function in our democracy: it demands that the President persuade both Congress and the public of the compelling need to send individuals into combat and that the President articulate to the people the purpose of that combat. This constraint on impulsive or imprudent unilateral executive action reflects the founders' recognition that the burdens of war fall not on its authors but upon those called to serve and on the nation as a whole. As James Madison observed, the executive is the branch "most interested in war and most prone to it," which is precisely why the decision to initiate hostilities was entrusted to the legislature. Congress must now affirmatively exercise its constitutional responsibilities, including by debating and voting on the continued use of force and, where appropriate, denying funding for unauthorized military action.[12] Failure to pass legislation blocking the war does not constitute authorization.[13]

The 1947 National Security Act gave statutory effect to this deliberative constitutional structure by creating a coordinated interagency process — through the National Security Council — to bring intelligence, defense, legal, and diplomatic considerations to the President.[14] The Director of National Intelligence, established after 9/11, coordinates intelligence so that decisions rest on comprehensive internal deliberation.[15] These internal assessments are intended to be shared with Congress, whose Intelligence, Armed Services, and Foreign Affairs Committees oversee the funding and lawful implementation of national security policy, including the prosecution of war.[16] Close confidential consultation with Congress, combined with public hearings to explain threats and strategy to citizens, are essential components of this process. In the lead up to the attack on Iran, apparently none of that information was provided and none of those consultations took place.[17]

In addition to our constitutional limits, the prohibition on the use of force against the territorial integrity or political independence of any state is a cornerstone of the international legal order and a bedrock principle that has served the United States well for over 80 years.[18] Force may be used only in specific circumstances: with UN Security Council authorization or in actual or truly imminent self-defense.[19] Neither condition was satisfied here. Ten days after the first U.S. attacks on Iran, U.S. Ambassador Michael Waltz submitted a letter to the President of the UN Security Council dated March 10, 2026 setting forth the U.S. legal justifications for the war.[20] The letter does not claim that any current or prior resolution of the Security Council authorized the attacks. Nor does it cite any official request from a UN Member State (Israel) inviting the U.S. to join in its collective self-defense which is required by international law.[21] The letter argues that the attacks are justified as self-defense under Article 51 of the UN Charter. However, it fails to point to any attack or threat of attack by Iran against the United States that is even remotely imminent, instead citing the 1979 taking of U.S. diplomats as hostages, the 1983 Marine barracks bombing in Beirut, the 1996 Khobar Towers bombing in Saudi Arabia and other past incidents. None of these events can fairly be viewed as evidence of imminent threats. Evidence of on-going or continuing menaces do not meet the legal requirement of imminence of armed attack to establish the necessity of force under Article 51 in 2026.

Assertions after the fact that the strikes were justified by long-standing threats, including Iran's hostility, nuclear program or regional activities, do not appear to meet the legal threshold. In any event, these claims do not appear to justify any necessity of anticipatory self-defense, in which the use of force across borders must be necessitated by an imminent threat, one that is instant, overwhelming, and leaving no choice of means and no moment for deliberation. Military action aimed at addressing longer-term risks falls outside the bounds of lawful self-defense.[22] The Administration's *post-hoc*, shifting, and inconsistent reasons for use of force with vast domestic, regional and global impacts fall far short of the requirements and illustrate powerfully the reason our Constitution vests the war power in Congress rather than a single individual. The Administration's ever-changing proffered rationales likewise raise serious issues under the UN Charter's requirement for either Security Council authorization or national self-defense as a condition for use of force in this instance.[23]

The Conduct of War

Regardless of the decision to initiate armed conflict, all parties to the conflict remain bound by international humanitarian law. The principles of distinction, proportionality, and necessity require that military operations be directed only against lawful military objectives and that civilian harm not be excessive in relation to the anticipated military advantage.[24] Reports of significant civilian casualties and damage to civilian infrastructure and other privileged sites underscore the urgent need for full compliance with these obligations and for credible investigations into alleged violations. In light of threats to attack gas fields, oil refineries and even to seize Iran's nuclear material, the Department of Defense's *Law of War Manual* offers a useful reminder of customary law of war: "Attack [on] facilities, works, or installations containing dangerous forces, such as dams, nuclear power plants, or facilities producing weapons of mass destruction, is permissible *so long as it is conducted in accordance with other applicable rules, including the rules of discrimination and proportionality*."[25] Targeted attacks on civilian infrastructure such as schools, hospitals, water supplies or electrical power grids may constitute war crimes, as may threats to bomb a country "back to the Stone Age."[26] Most recently, President Trump's statement, "A whole civilization will die tonight, never to be brought back again," seems to threaten genocide.[27]

The City Bar is further concerned by the expanding scope of the conflict. Iran's retaliatory attacks have further widened the conflict and risk drawing additional states into a regional confrontation. Any use of force against states not directly involved raises serious legal concerns and threatens broader regional destabilization. Escalation in an already volatile region carries significant humanitarian, economic, and geopolitical consequences, including disruptions to global energy markets and international commerce.

Conclusion

Use of armed force commenced by our President without constitutional authority and that raises serious legal issues under the UN Charter erodes the credibility of the United States as a proponent of the rule of law, weakens our nation's standing in the global community and undermines the international legal order. Respect for the rule of law – both domestically and internationally – is not optional; it is foundational for peace and security for our nation and throughout the world.

The New York City Bar Association therefore:

- calls on Congress to exercise its constitutional responsibility to take all appropriate measures necessary to ensure that this use of force by the United States complies with the Constitution and U.S. law;
- calls on all parties to ensure that all military actions comply with their obligations under international law, including international humanitarian law;
- calls for investigations into alleged violations of international humanitarian law; and
- urges the immediate cessation of unlawful hostilities.

About the Association

The mission of the New York City Bar Association, which was founded in 1870 and has over 20,000 members, is to equip and mobilize a diverse legal profession to practice with excellence, promote reform of the law, and uphold the rule of law and access to justice in support of a fair society and the public interest in our community, our nation, and throughout the world. www.nycbar.org

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[1] On February 21, 2026, a week before the U.S. commenced this military action, the New York City Bar Association issued a Statement on the Threat of Use of Force Against Iran condemning the federal government's threats to deploy U.S. military force against Iran without Congressional or UN Security Council approval. *See* https://www.nycbar.org/press-releases/on-the-threat-of-use-of-force-against-iran/.

[2] UN Charter, articles 2(3) and 2(4) and Definition of Aggression, General Assembly Resolution 3314 (XXIX), Dec. 14, 1974, art. 5(1) ("No consideration of whatever nature, whether political, economic, military or otherwise, may serve as a justification for aggression.")

[3] See, *e.g.*, Statement of the New York City Bar Association on the Imprisonment of Human Rights Lawyer Nasrin Sotoudeh and Other Human Rights Defenders in Iran (Mar. 8, 2019), https://www.nycbar.org/reports/statement-of-the-new-york-city-bar-association-on-the-imprisonment-of-human-rights-lawyer-nasrin-sotoudeh-and-other-human-rights-defenders-in-iran/; Statement Urging Release from Prison of Nasrin Sotoudeh and Others as the Islamic Republic of Iran Marks Nowruz (Mar. 19, 2020), https://www.nycbar.org/reports/statement-urging-release-from-prison-of-nasrin-sotoudeh-and-others-as-the-islamic-republic-of-iran-marks-nowruz/; Two Dozen International Legal Organizations Call for End to Judicial Harassment of Reza Khandan and Nasrin Sotoudeh in Iran (Dec. 19, 2024), https://www.nycbar.org/press-releases/two-dozen-international-legal-organizations-call-for-end-to-judicial-harassment-of-reza-khandan-and-nasrin-sotoudeh-in-iran/; Letter Expressing Concern with the Incarceration of Defense Lawyer Abdolfattah Soltani (Feb. 2012), https://www.nycbar.org/reports/letter-to-the-ambassador-of-the-islamic-republic-of-iran-to-the-united-nations-expressing-concern-with-the-incarceration-of-defense-lawyer-abdolfattah-soltani-february-2012/; Letter to President Khatami Regarding the Imprisonment of Two Lawyers (Mar. 2003), https://www.nycbar.org/reports/letter-to-his-excellency-hojjatoleslam-val-moslemin-sayed-mohammad-khatami-president-of-the-islamic-republic-of-iran-regarding-the-imprisonment-of-two-lawyers-which-appears-to-be-solely-as-a-result-of/. Regrettably, Nasrin Sotoudeh has been detained again. "Award-winning Iranian human rights lawyer arrested in Tehran, says her daughter" *The Guardian*, Apr. 2, 2026, https://www.theguardian.com/global-development/2026/apr/02/award-winning-iranian-human-rights-lawyer-arrested-in-tehran-says-her-daughter. Consistent with the Association's mission to protect lawyers and the rule of law, we condemn in particular the physical and psychological risks currently faced by Iranian lawyers and human rights defenders on account of this war.

[4] Letter to the Ambassador of Iran Concerning Human Rights Violations Against Sexual Minorities in Iran (Jan. 2008), https://www.nycbar.org/reports/letter-to-the-ambassador-of-iran-concerning-human-rights-violations-against-sexual-minorities-in-iran/.

[5] Letter in Opposition to Attorneyship Bill in Iran (Nov. 17, 2015), https://www.nycbar.org/reports/letter-in-opposition-to-attorneyship-bill-in-iran/.

[6] Day of the Endangered Lawyer: Lawyering in Iran (Jan. 23, 2024), https://www.nycbar.org/videos/day-of-the-endangered-lawyer-lawyering-in-iran/.

[7] On March 26, the Congressional Record Service reported that 50,000 troops had been deployed to the Iran conflict. https://www.congress.gov/crs_external_products/R/PDF/R48887/R48887.1.pdf; https://budgetmodel.wharton.upenn.edu/blog/BE2026-2/ (Noting that the U.S. government has spent $27 to 28 billion in first 32 days of war, with expenditures of $38 to 47 billion by the end of April); https://www.nytimes.com/article/iran-war-trump-us-oil-hormuz-key-dates-events.html (timeline covering the expanding scope of conflict).

[8] U.S. Const. art. I, § 8, cls. 11–14 (power to declare war, grant letters of marque and reprisal, raise and support armies, provide and maintain a navy); *see also* U.S. Const. art. I, § 9, cl. 7 (Appropriations Clause). For a discussion of the reasoning behind this allocation of powers, see Steven P. Mulligan, "Legal Sidebar: The Declare War Clause, Part 2: Historical Background, Drafting, and Ratification" Congressional Research Service, Sept. 30, 2024 at https://www.congress.gov/crs-product/LSB11231. And see, Mallory Wilson, "Trump avoids word 'war' to describe Iran conflict 'because you're supposed to get approval'", *The Hill*, Mar. 25, 2026 (quoting the President, "I won't use the word 'war' because they say if you use the word 'war,' that's maybe not a good thing to do," Trump told the crowd of GOP lawmakers at Union Station in Washington, D.C. "They don't like the word 'war' because you're supposed to get approval. So, I'll use the word 'military operation,' which is really what it is. It's a military decimation.").

[9] Authorization for Use of Military Force, Pub. L. No. 107-40, 115 Stat. 224 (2001) ("2001 AUMF"); Authorization for Use of Military Force Against Iraq Resolution of 2002, Pub. L. No. 107-243, 116 Stat. 1498 (2002) ("2002 Iraq AUMF"), repealed by National Defense Authorization Act for Fiscal Year 2024, Pub. L. No. 118-31, § 1722, 137 Stat. 136 (2023).

[10] The *Caroline* incident articulated the customary international law standard for anticipatory self-defense. Letter from Daniel Webster to Lord Ashburton (Aug. 6, 1842), *reprinted in* 29 British and Foreign State Papers 1129, 1138 (1857) (requiring a "necessity of self-defence, instant, overwhelming, leaving no choice of means, and no moment for deliberation"). In that case, the U.S. rejected Great Britain's claim of necessity based on a pattern of dangerous behavior emanating from the U.S. side of the border with Canada. See also War Powers Resolution, 50 U.S.C. §§ 1541–1548 (1973). For a full discussion of the limits on presidential powers and the role of Congress in authorization of the use of force, See Michael D. Ramsey & Stephen I. Vladeck, Common Interpretation: Declare War Clause, Nat'l Const. Ctr., https://constitutioncenter.org/the-constitution/articles/article-i/clauses/753 (last visited Apr. 21, 2026) (describing the consensus view that the President may only use force when Congress authorizes it, formally or by statute. Presidents may respond to attacks on the U.S. and may deploy forces in limited situations such as peacekeeping. UN authorization has been argued as a substitute for congressional approval. More recently, Jack Goldsmith has argued that "Law is Irrelevant to the U.S. Attack on Iran" in *Executive Functions*, (Feb. 28, 2026), https://www.execfunctions.org/p/law-is-irrelevant-to-the-us-attack.

While there is a range of reasonable interpretations of these issues, the current statement reflects the New York City Bar Association's long and consistently maintained position, even if it has not issued statements on every U.S. use of force. Following the United States invasion of Panama in 1989 under President George W. Bush, the New York City Bar Association conducted a study of the United States decision to use military force and concluded that the invasion lacked support under international law. *See Use of Armed Force in International Affairs: The Case of Panama, The, 47 [[SC]]Rec. Ass'n B. City N.Y.[[/SC]] 604 (1992)*. In 2002, the City Bar considered the legality and constitutionality of President George W. Bush's authority to initiate an invasion into Iraq and concluded that the President needed Congressional authorization to launch a large-scale invasion for the purposes of a regime change or on "moral grounds." *See Legality and Constitutionality of the President's Authority to Initiate an Invasion of Iraq, The, 57 REC. ASS'N B. CITY N.Y. 378 (2002)*. In 2014, the City Bar evaluated the legality under international law of "targeted killings" by drone strikes and critiqued the Obama administration's lack of transparency and justifications for conducting certain drone strikes. *See* New York City Bar Association, *The Legality Under International Law of Targeted Killings by Drones Launched by the United States* (Int'l L. Comm., June 16, 2014), https://www2.nycbar.org/pdf/report/uploads/20072625-TheLegalityofTargetedInternationalKillingsbyUS-LaunchedDrones.pdf. In 2017, the City Bar issued a letter to President Trump arguing that in the absence of an actual or imminent attack on the United States (or in some circumstances on its allies), the President has no authority to commence a war in "anticipatory self-defense" on another nation without prior Congressional approval. *See* New York City Bar Association., *Letter to President Donald Trump* (Oct. 4, 2017), https://www.nycbar.org/wp-content/uploads/2023/05/2017277-North_Korea_Letter_National_Security_TF_10.4.17.pdf. In October 2025, the City Bar issued a statement on President Donald J. Trump's ordering of U. S. military strikes against private Venezuelan-flagged vessels on the high seas and concluded that there is neither a lawful nor factual justification to engage our armed forces to use lethal force in international waters in the absence of lawful armed conflict or self-defense. The City Bar called upon the President to desist from any further unlawful attacks on the high seas. *See* New York City Bar Association, *Unlawful Attacks on Venezuelan Vessels* (Oct. 6, 2025), https://www.nycbar.org/press-releases/unlawful-attacks-on-venezuelan-vessels/. In January 2026, the City Bar issued a statement condemning the use of military force in Venezuela to seize its President, assert control over its oil reserves, and "run" its country. The statement argued that the actions violated the U.S. Constitution, War Powers Act of 1973, and the U.N. Charter. *See* New York City Bar Association, *Congress Must Act to Halt the President's Violations of U.S. and International Law in Venezuela* (Jan. 5, 2026), https://www.nycbar.org/press-releases/congress-must-act-to-halt-the-presidents-violations-of-u-s-and-international-law-in-venezuela/.

[11] Letter from Donald J. Trump, President of the United States, to Charles E. Grassley, President Pro Tempore of the Senate, on United States Military Operations in Iran (Mar. 2, 2026), https://www.documentcloud.org/documents/27725118-war-powers-report-iran.

[12] See our report, *The Crisis Deepens: Congress Must Act Now to Address Escalating Abuses of Executive Power,* (Mar. 9, 2026), https://www.nycbar.org/reports/the-crisis-deepens-congress-must-act-now-to-address-escalating-abuses-of-executive-power/?back=1.

[13] As Louis Henkin noted, "Congress must authorize—not simply consult or receive reports—when the nation goes to war." The War Powers Resolution, 44 REC. ASS'N B. CITY N.Y. 106, 125 (1989).

[14] National Security Act of 1947, Pub. L. No. 80-253, 61 Stat. 495 (codified as amended at 50 U.S.C. § 3001 et seq.), establishing the National Security Council, the Department of Defense, and the Central Intelligence Agency.
[15] Intelligence Reform and Terrorism Prevention Act of 2004, Pub. L. No. 108-458, § 1011, 118 Stat. 3638, 3643–61 (codified at 50 U.S.C. § 3023), establishing the Director of National Intelligence to serve as head of the intelligence community and principal adviser to the President on intelligence matters.
[16] Senate Select Committee on Intelligence, S. Res. 400, 94th Cong. (1976); House Permanent Select Committee on Intelligence, H. Res. 658, 95th Cong. (1977); 50 U.S.C. § 3091 (requiring the President to ensure intelligence committees are kept "fully and currently informed" of intelligence activities). The Senate Armed Services Committee derives its jurisdiction from Senate Rule XXV; the House Armed Services Committee from House Rule X. The Senate Foreign Relations Committee and House Foreign Affairs Committee exercise oversight of foreign policy and international agreements under their respective chamber rules.
[17] No member of Congressional leadership or the relevant committees has confirmed receiving advance notification or consultation regarding the decision to use military force against Iran. Public reporting indicates that the so-called "Gang of Eight" was informed only after the attack on Iran commenced. https://www.cnn.com/2026/02/28/politics/iran-strikes-congress-war-powers-trump.
[18] Charter of the United Nations, Art. 2(4).
[19] Charter of the United Nations, Art. 51 (recognizing the inherent right of self-defense "if an armed attack occurs"). For a more complete discussion, see "Over 100 International Law Experts Warn: U.S. Strikes on Iran Violate UN Charter and May Be War Crimes," https://www.justsecurity.org/135423/professors-letter-international-law-iran-war/.
[20] United Nations S/2026/161, Mar. 11, 2026, Letter dated 10 March 2026 from the Permanent Representative of the United States of America to the United Nations addressed to the President of the Security Council https://www.documentcloud.org/documents/27888144-n2605041/.
[21] Military and Paramilitary Activities in and against Nicaragua (Nicaragua v. United States), Merits, ICJ Reports 1986, para. 165, 191, 200 *ff* (In view of the assertion by the United States that it has acted in exercise of the right of collective self-defense for the protection of El Salvador, Honduras and Costa Rica, the Court has also to consider the evidence available on the question whether those States, or any of them, made a request for such protection.). And see Brian Finucane, "An Unserious Justification for an Unnecessary War: Assessing the U.S. 'Article 51' Letter to U.N. on Iran War," https://www.justsecurity.org/134290/us-article-51-letter-united-nations/ ("[T]he letter fails to specify what supposed armed attack by Iran on Israel provided the predicate for the use of force in collective self-defense"). On April 21, the State Department Legal Adviser posted a statement repeating many of the same assertions made in the March 10 Article 51 letter, and adding that the United States "engaged in this conflict at the request of and in the collective self-defense of its Israeli ally." There is nothing in the public record or any other statements by the U.S. government indicating that Israel has requested collective self-defense from the United States. See https://www.state.gov/releases/office-of-the-legal-adviser/2026/04/operation-epic-fury-and-international-law. For an analysis of why the April 21 web post fails to meet the international law of self-defense, see Brian Finucane, On the State Department Memorandum "Operation Epic Fury and International Law," Just Security (Apr. 24, 2026), https://www.justsecurity.org/137097/state-department-epic-fury-international-law/, https://www.justsecurity.org/137097/state-department-epic-fury-international-law/. This current statement by the New York City Bar Association does not purport to address Israel's claims of self-defense.
[22] Military and Paramilitary Activities in and against Nicaragua (Nicaragua v. United States), Merits, ICJ Reports 1986, para. 191; Oil Platforms (Islamic Republic of Iran v. United States), Judgment, ICJ Reports 2003, paras. 51-64.
[23] United Nations Charter, art. 2(4) (All Members shall refrain in their international relations from the threat or use of force against the territorial integrity or political independence of any state, or in any other manner inconsistent with the Purposes of the United Nations.); United Nations S/2026/161, Mar. 11, 2026, Letter dated 10 March 2026 from the Permanent Representative of the United States of America to the United Nations addressed to the President of the Security Council and Letter from President Trump to Charles Grassley, President *Pro Temp* of the U.S. Senate, Mar. 2, 2026). Article 51 is a narrow exception for self-defense, not a broad justification for escalation. The Association cautions against interpretations of necessity and proportionality that risk eroding long-standing legal constraints.
[24] See Geneva Conventions of 1949, Common Article 3; Protocol Additional to the Geneva Conventions of 12 August 1949 (Additional Protocol I), arts. 48, 51, 52, 57; ICRC Customary International Humanitarian Law Study, Rules 1, 14, and 15.
[25] U.S. DOD Law of War Manual, §5.13, https://apps.dtic.mil/sti/trecms/pdf/AD1207225.pdf (emphasis added).
[26] U.S. DOD Law of War Manual, §5.4.2, §5.4.3.2 and §5.16.1.

[27] *New York Times*, "With Threat to Wipe Out Iran's Civilization, Trump's Rhetoric Goes Beyond Bluster," Apr. 7, 2026, https://www.nytimes.com/2026/04/07/us/politics/trump-iran-civilization-threat.html. Convention on the Prevention and Punishment of the Crime of Genocide, December 9, 1948, UN General Assembly resolution 260 A (III). And see, Margaret Donovan and Rachel VanLandingham, Lt Col, USAF (Ret.), "When War Crimes Rhetoric Becomes Battlefield Reality: The Slippery Slope to Total War on Iran", *Just Security*, Apr. 6, 2026, https://www.justsecurity.org/135797/war-crimes-rhetoric-power-plants-iran/.