Disappearances, Deaths, and Denials

An Open Source Investigation into Violations Against Children During the Woman, Life, Freedom Movement in the Islamic Republic of Iran

January 2025

The Digital Investigations Lab

UCLA School of Law

Cover image: Photo captured by a protester on 26 October 2022 shows mourners marching to Mahsa Jina Amini's grave at Aichi Cemetery, near her Kurdish hometown Saqqez, Kurdistan Province, northwest Iran. The traditional mourning period in Iranian culture lasts 40 days. Usually, the immediate family members wear black during this period and hold a memorial event on the last day. In case of slain protesters, both funerals and the 40th-day ceremonies turned into pivotal days of protest.

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I. Introduction

This report, "Disappearances, Deaths, and Denials: An open source investigation into violations against children during the Woman, Life, Freedom movement in the Islamic Republic of Iran," forms part of a series of open source investigations analyzing various human rights violations and international crimes committed by the Islamic Republic of Iran (IRI or Islamic Republic) in its brutal crackdown on Woman, Life, Freedom protesters that began in September 2022. The research conducted in each investigation is based on open source content preserved as part of the Iranian Archive housed at Mnemonic – a repository of digital content that has been forensically preserved for use in future accountability efforts. Each report in this series focuses on a specific set of violations, and together they make visible some of the harms suffered by Iranian protesters in their demands for freedom and respect for their human rights. This introduction provides a brief overview of the movement and the IRI's response, current investigations at the international level, calls for accountability, and a synopsis of the Iranian Archive created by Mnemonic as well as how the Iran Digital Archive Coalition contributed to it.

A. Woman, Life, Freedom Movement¹

Following the 2021 election of now-deceased President Ebrahim Raisi — a loyal supporter of the Supreme Leader Ayatollah Ali Khamenei — the Islamic Republic started rolling out measures to tighten its grip on all aspects of life in Iran.² These included harassment and the arrest of dissenters. This period has been described as a new "reign of terror" by human rights groups,³ one punctuated by a crackdown on women's rights.⁴ In 2022, top officials - including President Raisi and numerous Friday Prayer Imams (powerful clerics handpicked by the Supreme Leader) - ordered, promoted, and justified the violent enforcement of "hijab and chastity" laws for women,⁵ which led to a brutal crackdown on women with allegedly improper hijab.⁶ As the violence intensified, people in Iran called for acts of civil disobedience on 12 July 2022. July 12th is the official "Day of Hijab and Chastity" in Iran, during which government officials are expected to promote chastity and wearing of the hijab for a week. On that day in 2022, women posted videos of themselves removing their hijab in public using the Persian hashtag "no to hijab" (حجاب_بی_حجاب#), with male allies sharing additional photos displaying similar hashtags and slogans.⁷ At the same time, supporters of the Islamic Republic used social media to threaten women with acid attacks designed to cause disfigurement,⁸ a tactic used in the past by fundamentalists in Iran to sow

² Khosro Kalbasi Isfahani, The 'Butcher of Tehran' is dead. It won't change a thing, Atlantic Council (23 May 2024), https://www.atlanticcouncil. org/blogs/iransource/raisi-death-butcher-of-tehran-iran-policy/.

³ Heightened Reign of Terror in Iran Under New Intelligence Chief, Center for Human Rights in Iran (11 Jul. 2022), https://iranhumanrights. org/2022/07/heightened-reign-of-terror-in-iran-under-new-intelligencechief/.

⁴ ججاب در ایران: وضع مقررات تازه و واکنش ها به آن BBC Persian (6 Jul. 2022), https://www.bbc.com/persian/iran-62068950

Iranian President Orders Enforcement of Hijab and Chastity Law for
 Women, RadioFreeEurope/RadioLiberty (7 Jul. 2022), https://www.rferl.
 org/a/iran-president-orders-enforcement-hijab-chastity-law/31933583.html.
 (@ManotoNews), X, (10 Jul. 2022, 3:19 AM), https://x.com/
 ManotoNews/status/1546076707894857729.

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^{(@1500}tasvir), X, (12 Jul. 2022, 7:04 AM), https://x.com/1500tasvir/ status/1546858037457162246.

⁸ Khosro K Isfahani (@KhosroIsfahani), X, (11 Jul. 2022), https://x.com/ KhosroIsfahani/status/1546445179053395969.

fear among women they consider "unchaste."⁹ This wave of persecution culminated with the arrest of Sepideh Rashnu, a young Iranian writer who was jailed and tortured for not wearing a headscarf and then made to give a forced confession of her "crimes" before state broadcasters to sow fear among the public and discourage dissent.¹⁰ However, the violent crackdown on civil liberties — coupled with a tanking economy $-^{11}$ had stoked public anger.

On 16 September 2022, less than two months after Rashnu's violent arrest, Mahsa "Jina" Amini, a 22-year-old woman from Iran's historically marginalized Kurdish ethnic minority, died in police custody in Tehran after being in a coma for three days. She had been detained for allegedly donning an "improper hijab" while on a family trip to Tehran from her Kurdish hometown of Saggez, and taken to the notorious Vozara Detention Center to be "educated" about hijab restrictions.¹² This "education" is believed to have included vicious beatings. Islamic Republic officials have denied any wrongdoing and claim that she died of a sudden heart attack, but United Nations (UN) experts have found evidence of physical violence inflicted while in custody that led to her death.¹³

Amini's death sparked nationwide protests. Young women took to the streets — burning their headscarves, dancing, and calling for an end to

9 In 2014, people took to the streets of the city of Isfahan after a wave of acid attacks, which appeared to be aimed at terrorizing women who violated the country's strict Islamic dress code. See Thomas Erdbrink, Thousands in Iran Protest Acid Attacks on Women, N.Y. Times (22 Oct. 2014), https://www.nytimes.com/2014/10/23/world/middleeast/thousands-in-iran-protest-acid-attacks-on-women. html#:~:text=TEHRAN%20%E2%80%94%20Thousands%20of%20
Iranians%20took,%E2%80%9Cun%2DIslamic%E2%80%9D%20way.
10 Sepideh Rashnu Receives Summons to Serve Almost Four Years in

the regime.¹⁴ Wide swaths of Iranian society joined the movement, including parents, grandparents, ethnic and religious minorities, LGBTQ+ persons, and people representing all genders and socioeconomic backgrounds, supporting the demands for "Woman, Life, Freedom" and calling for an end to the four-decade rule of Iran by the Islamic Republic.¹⁵

Since the inception of the Islamic Republic in 1979, its reign has been marred by human rights violations that likely amount to crimes against humanity – from mass executions of political prisoners in the early 1980s and 1988;¹⁶ to the murders of Iranian intellectuals and political dissidents in the 1980s and 1990s;¹⁷ to persecution of marginalized groups including women, ethnic,¹⁸ and religious¹⁹ minorities, and the LGBTQ+ community.²⁰ These human rights abuses have been coupled with political mismanagement and corruption, a tanking economy,²¹ and environmental crises²² caused by ideology-driven state policies.

17 The 'Chain Murders': Iran's Long, Bloody Reach, RadioFreeEurope/ RadioLiberty, https://www.rferl.org/a/iran-chain-murders-abroad/31596154. html (last visited 18 Jul. 2024).

19 "The Boot on My Neck" Iranian Authorities' Crime of Persecution Against the Baha'is in Iran, Human Rights Watch, (1 Apr. 2024), https:// www.hrw.org/report/2024/04/01/boot-my-neck/iranian-authoritiescrime-persecution-against-bahais-iran#:~:text=Baha'is%20are%20the%20 largest, is%2C%20 including%20 their%20 community%20 leaders. U.S. Report: LGBTQI+ Persecution in Iran, The Iran Primer (25 20 Apr. 2024), https://iranprimer.usip.org/blog/2024/apr/25/us-reportlgbtqi-persecution-iran#:~:text=Iran's%20laws%2C%20based%20on%20 a,consensual%20and%20nonconsensual%2C%20was%20criminalized. Sayeh Isfahani, The Ebrahim Raisi government just jacked up food 21 prices. Iranians are understandably angry., Atlantic Council (12 May 2022), https://www.atlanticcouncil.org/blogs/iransource/the-ebrahim-raisigovernment-just-jacked-up-food-prices-iranians-are-understandably-angry/. 22 Golnaz Esfandiari and Mohammad Zrghami, Iran's Climate Migration Crisis Could Turn into a Disaster, Radio Free Europe, Radio Liberty (Dec. 18, 2023), https://www.rferl.org/a/iran-climate-migrants-crisis/32729538.html.

Prison, Front Line Defenders https://www.frontlinedefenders.org/en/case/ sepideh-rashnu-receives-summons-serve-almost-four-years-prison (last visited 18 Jul. 2024).

¹¹ Sayeh Isfahani, The Ebrahim Raisi government just jacked up food prices. Iranians are understandably angry., Atlantic Council (12 May 2022), https://www.atlanticcouncil.org/blogs/iransource/the-ebrahim-raisigovernment-just-jacked-up-food-prices-iranians-are-understandably-angry/.

David Gritten, Mahsa Amini: Protests over woman's death claim more lives in Iran, BBC (21 Sept. 2022), https://www.bbc.com/news/world-middleeast-62986057; UN experts strongly condemn death of Mahsa Amini, 'victim of Iran's sustained repression', UN News (22 Sept. 2022), https://news.un.org/ en/story/2022/09/1127471.

¹³ Lipika Pelham, Mahsa Amini: Iran responsible for 'physical violence' leading to death, UN says, BBC (8 Mar. 2024), https://www.bbc.com/news/ world-middle-east-68511112; Gabriella Tétrault-Farber, Mahsa Amini's death in Iran custody was 'unlawful,' says UN mission, Reuters (18 Mar. 2024), https://www.reuters.com/world/middle-east/mahsa-aminis-death-irancustody-was-unlawful-says-un-mission-2024-03-18/.

¹⁴ How the women and girls of Iran have fueled their 'unprecedented' protests: Bravery, solidarity, and innovation, Atlantic Council (11 May 2024), https://www.atlanticcouncil.org/news/transcripts/how-the-women-andgirls-of-iran-have-feled-their-unprecedented-protests-bravery-solidarityand-innovation/; Somayeh Malekian, Iranian women drive protests targeting regime after suspicious death of Mahsa Amini, ABC News (22 Sept. 2022), https://abcnews.go.com/International/iranian-women-drive-proteststargeting-regime-suspicious-death/story?id=90313020.

¹⁵ Suzanne Kianpour, The Women of Iran Are Not Backing Down, Politico (22 Jan. 2023), https://www.politico.com/news/magazine/2023/01/22/womenrights-iran-protests-00069245; Tara Sepehri Far, Unveiling Resistance: The Struggle for Women's Rights in Iran, Human Rights Watch (26 June 2023), https://www.hrw.org/news/2023/06/26/unveiling-resistance-strugglewomens-rights-iran.

¹⁶ Iran: Blood-soaked secrets: Why Iran's 1988 prison massacres are ongoing crimes against humanity, Amnesty International, (4 Dec. 2018), https://www.amnesty.org/en/documents/mde13/9421/2018/en/.

¹⁸ Press Release, Office of the High Commissioner for Human Rights, Iran: UN expert says ethnic, religious minorities face discrimination, UN Fact-Finding Mission says, UN Press Release (22 Oct. 2019).

People in Iran have responded to the oppression with resilience, including solitary and collective acts of defiance. The Woman, Life, Freedom movement is part of a long history of people's protests in Iran: the six-day uprising of women in March 1979 protesting the introduction of mandatory hijab;²³ the student uprising of July 1999 over a crackdown on freedom of press;²⁴ the 2009 Green Movement protests in response to a fraudulent election; ²⁵the Bloody Aban protests in November 2019, where hundreds of civilians were killed by security forces during a total internet shutdown;²⁶ protests over a water crisis in 2021;²⁷ food price hikes in 2022,²⁸ and more. The Islamic Republic responded to each wave of protests with violence.

The Woman, Life, Freedom movement — the most widespread protest in the Islamic Republic's history — has fared similarly, with the regime unleashing brutal force against protesters. As of March 2024, rights groups estimate that more than 500 people have been killed, including as many as 68 children.²⁹ Persecuted Sunni Kurdish and Baluch communities absorbed the brunt of the violence.³⁰ On "Bloody Friday of Zahedan," 30 September 2022, at least 94 civilians were killed and 350 were wounded by security forces in Zahedan, Sistan,

(26 Dec. 2022), https://www.bbc.com/news/world-middle-east-64062900.
30 BBC 100 Women, Disinformation, Monitoring, BBC Persian and Visual Journalism teams, Iran protests: BCC identifies many more people killed in demonstrations after Mahsa Amini's death, BBC (5 Dec. 2022), https://www.bbc.com/news/world-middle-east-63836921.

and Baluchestan Province.³¹ Credible estimates put the number of people detained at over 20,000.³² As of July 2024, at least nine young men, many of whom were subjected to torture in detention, had been executed after trials based on charges relating to the 2022 protests that were marred by forced confessions and other ill-treatment.³³ Recent reporting shows the lengths to which the IRI not only violently repressed those they deemed to be involved with the protests, but tried to cover up that violence.³⁴

Despite repeated denials from officials that they were targeting protesters, leaked government documents show that the Islamic Republic's highest military authorities gave explicit instructions to armed forces in every province to "severely confront" protesters in the weeks following Amini's killing.³⁵ The levels of violence employed by security forces and other officials leave no doubt of the IRI policy. Since protests began in September 2022, hundreds of people have been blinded or suffered other injuries in or

²³ In 1979, Iranian women protested mandatory veiling - setting the stage for today, CBC Radio (5 Oct. 2022), https://www.cbc.ca/radio/ideas/iranwomen-protests-1979-revolution-1.6605982.

²⁴ Behrouz Turani, Remembering The July 1999 Iran Student Movement; A Forgotten Protest?, RadioFarda (9 Jul. 2020), https://en.radiofarda. com/a/remembering-the-july-1999-iran-student-movement-a-forgottenprotest-/30716685.html.

²⁵ Iran: Election contested, repression compounded, Amnesty International (10 Dec. 2009), https://www.amnesty.org/en/documents/ mde13/123/2009/en/.

²⁶ A Web of Impunity; The killings Iran's internet shut down hid, Amnesty International (16 Nov. 2020), https://iran-shutdown.amnesty.org/.

²⁷ Sahab Bahar, Iran's water is running dry. Now its water woes are worsening., Atlantic Council (13 Dec. 2021), https://www.atlanticcouncil. org/blogs/iransource/irans-water-is-running-dry-now-its-water-woes-areworsening/.

<sup>Sayeh Isfahani, The Ebrahim Raisi government just jacked up food prices. Iranians are understandably angry., Atlantic Council (12 May 2022), https://www.atlanticcouncil.org/blogs/iransource/the-ebrahim-raisi-government-just-jacked-up-food-prices-iranians-are-understandably-angry/.
Iran committed crimes against humanity during protest crackdown, UN says, AlJazeera (8 Mar. 2024), https://www.aljazeera.com/news/2024/3/8/iran-committed-crimes-against-humanity-during-protest-crackdown-un-says;
Parham Ghobadi, Iran protests: 'No going back' as unrest hits 100 days, BBC</sup>

³¹ Bloody Friday in Zahedan, Iran Human Rights Documentation Center (19 Oct. 2022), https://iranhrdc.org/bloody-friday-in-zahedan/.

³² David Gritten, Aida Shakarami: Iran morality police arrests dead protester's sister, mother says, BBC (18 Apr. 2024), https://www.bbc.com/ news/world-middle-east-68849736.

³³ David Gritten, Mohammad Ghobadlou: Iran executes protester with mental health condition, BBC (23 Jan. 2024), https://www.bbc.com/news/ world-middle-east-68068233; Iran executives 853 people in eight-year high amind relentless repression and renewed 'war on drugs', Amnesty International (4 Apr. 2024), https://www.amnesty.org/en/latest/news/2024/04/ iran-executes-853-people-in-eight-year-high-amid-relentless-repression-andrenewed-war-on-drugs/; Iran: Executions of tortured protesters must trigger a robust reaction from the international community, Amnesty International (19 May 2023), https://www.amnesty.org/en/latest/news/2023/05/iranexecutions-of-tortured-protesters-must-trigger-a-robust-reaction-from-theinternational-community/; Parham Ghobadi, Who are the protesters facing execution in Iran?, BBC (15 Dec. 2022), https://www.bbc.com/news/worldmiddle-east-63949566?at_medium=RSS&at_campaign=KARANGA; David Gritten, Iran executes three over anti-government protests, BBC (19 May 2023), https://www.bbc.com/news/world-middle-east-65640263.

³⁴ Parham Ghobadi, Nika Shakarami: Videos show Iran teenager protesting before death, BBC (10 Oct. 2022), https://www.bbc.com/news/ world-middle-east-63200652; Gianluca Mezzofiore, Katie Polglase, Adam Pourahmadi, What really happened to Nika Shahkarami? Witnesses to her final hours cast doubts on Iran's story, CNN (27 Oct. 2022), https://edition. cnn.com/2022/10/27/middleeast/iran-nika-shahkarami-investigation-intlcmd/index.html; Betram Hill, Aida Miller, Michael Simkin, Secret document says Iran security forces molested and killed teen protester, BBC (29 Apr. 2024), https://www.bbc.com/news/world-middle-east-68840881; Jon Gambrell, Iran files charges over BBC report on teen girl allegedly killed by security forces in 2022 protests, AP News (1 May 2024), https://apnews.com/ article/iran-protests-mahsa-amini-nika-shakarami-85332f1f3fe730fc42cbad3 d7518f4c4.

³⁵ Iran: Leaked documents reveal top-level orders to armed forces to 'mercilessly confront' protesters, Amnesty International (30 Sept. 2022), https://www.amnesty.org/en/latest/news/2022/09/iran-leaked-documentsreveal-top-level-orders-to-armed-forces-to-mercilessly-confront-protesters/.

around their eyes from metal pellets or rubber bullets.³⁶ Some protesters report that security forces explicitly threatened to shoot them in the eyes, even smiling before pulling the trigger.³⁷ Sexual violence and torture has been rampant, including against children.³⁸ Those who dissent online have been targeted with criminalization for speech critical of the regime, while artists have been arrested, often tortured, and even sentenced to death.³⁹ Journalists have likewise been targeted, with at least 80 being arrested,⁴⁰ including the two woman journalists who first broke the story on Amini's killing.⁴¹

As the protests have continued, international attention has shifted to other conflicts, even as the Islamic Republic has doubled down on

38 Iran: Security forces used rape and other sexual violence to crush "Woman Life Freedom" uprising with impunity, Amnesty International (6 Dec. 2023), https://www.amnesty.org/en/latest/news/2023/12/iran-securityforces-used-rape-and-other-sexual-violence-to-crush-woman-life-freedomuprising-with-impunity/; Iran: Security Forces Rape, Torture, Detainees, Human Rights Watch (22 Apr. 2024), https://www.hrw.org/news/2024/04/22/ iran-security-forces-rape-torture-detainees; Tamara Qiblawi, et al., How Iran's security forces use rape to quell protests, CNN (21 Nov. 2022), https:// edition.cnn.com/interactive/2022/11/middleeast/iran-protests-sexual-assault/ index.html; Iran: Child detainees subjected to flogging, electric shocks and sexual violence in brutal protest crackdown, Amnesty International (16 Mar. 2023), https://www.amnesty.org/en/latest/news/2023/03/iran-child-detaineessubjected-to-flogging-electric-shocks-and-sexual-violence-in-brutal-protestcrackdown/; Iran: Security Forces Kill, Torture, Abuse Children, Human Rights Watch (25 Apr. 2023), https://www.hrw.org/news/2023/04/25/iransecurity-forces-kill-torture-abuse-children.

39 Khosro Kalbasi Isfahani and Andrea Alice Richardson, Everything you need to know about Iranian rapper Toomaj Salehi and his death sentence, Atlantic Council (26 Apr. 2024), https://www.atlanticcouncil.org/blogs/ iransource/toomaj-salehi-iran-rapper-execution/; Associated Press, Iranian singer who won Grammy for Mahsa Amini protest anthem is sentenced to prison in Iran, NBC News (2 Mar. 2024), https://www.nbcnews.com/news/ world/iranian-singer-won-grammy-mahsa-amini-protest-anthem-sentencedprison-rcna141499; Jon Gambrell, Award-winning director Mohammad Rasoulof sentenced to prison in Iran ahead of Cannes, AP (9 May 2024), https://apnews.com/article/iran-protests-director-mohammad-rasoulofprison-415e70cbe740191d130747907ca8e25e.

40 Names of journalists arrested in Iran's anti-state protests, Committee to Protect Journalists (30 Sept. 2022), https://cpj.org/2022/09/names-of-journalists-arrested-in-irans-anti-state-protests/.

enforcement of the mandatory dress code and broad repression of people in Iran. The latest crackdown has included a resurgence of morality police patrols, with videos surfacing online of women being forced into vans by police.42 The most recent surge of violence has come under the "Nour" ("light" in Persian) campaign, announced on 13 April 2024 on state television by the chief of police in Tehran, the same day the IRI launched its drone and missile attack against Israel.43 Later in April, the Islamic Revolutionary Guard Corps announced that a new body had been created to enforce the mandatory dress code "in a more serious manner."44 Reports indicate that businesses found not to enforce the mandatory hijab on their premises have been forcibly closed and that cameras are being used to surveil women while in their cars to identify and punish those seen as not complying with the rules.⁴⁵ Meanwhile, the draft Hijab and Chastity Bill continues to advance in the legislative process -a bill that would impose even harsher punishments for violations of the mandatory dress code and criminalize actions like

³⁶ Cora Engelbrecht, Hundreds of Protesters in Iran Blinded by Metal Pellets and Rubber Bullets, N.Y. Times (23 Nov. 2022), https://www.nytimes. com/2022/11/19/world/asia/iran-protesters-eye-injuries.html.

³⁷ Edward Lempinen, More than 120 protesters blinded by Iranian agents, probe confirms, Berkeley News (21 March 2024), https://news.berkeley. edu/2024/03/21/more-than-120-protesters-blinded-by-iranian-agents-probeconfirms/.

⁴¹ Maryam Afshang, The journalists imprisoned for reporting the death that shook Iran, BBC (4 May 2023), https://www.bbc.com/news/worldmiddle-east-65466887; Iran has arrested 79 journalists in a staggering crackdown since Mahsa Amini's death a year ago, Reporters Without Borders (15 Sept. 2023), https://rsf.org/en/iran-has-arrested-79-journalists-staggeringcrackdown-mahsa-amini-s-death-year-ago; Annie Kelly, Female journalists under attack as press freedom falters, The Guardian (6 May 2024), https:// www.theguardian.com/media/article/2024/may/06/female-journalists-underattack-as-press-freedom-falters.

^{42 &#}x27;War against women': Iran ramps up crackdown as regional tensions rage, France24 (21 Apr. 2024), https://www.france24.com/en/livenews/20240421-war-against-women-iran-ramps-up-crackdown-as-regionaltensions-rage; Deepa Parent, Iranian women violently dragged from streets by police amid hijab crackdown, The Guardian (24 Apr. 2024), https://www. theguardian.com/global-development/2024/apr/24/iranian-women-violentlydragged-from-streets-by-police-amid-hijab-crackdown.

⁴³ Dan De Luce, Iran has launched a new crackdown on women defying its strict dress code, NBC News (9 May 2024), https://www.nbcnews. com/news/world/iran-launches-crackdown-women-defying-hijab-dresscode-rcna151406; USCIRF Calls for Additional Sanctions Amidst New Harsh Enforcement of Iran's Mandatory Hijab Law, U.S. Commission on International Religious Freedom (6 May 2024), https://www.uscirf.gov/newsroom/releases-statements/uscirf-calls-additional-sanctions-amidst-newharsh-enforcement-irans.

⁴⁴ UN Office of the High Commissioner for Human Rights, Iran: Crackdown on hijab law (26 Apr. 2024), https://www.ohchr.org/en/pressbriefing-notes/2024/04/iran-crackdown-hijab-law#:~:text=UN%20High%20 Commissioner%20for%20Human%20Rights%20Volker%20T%C3%BCrk%20 calls%20on,human%20rights%20norms%20and%20standards.

⁴⁵ Dan De Luce, Iran has launched a new crackdown on women defying its strict dress code, NBC News (9 May 2024), https://www.nbcnews.com/ news/world/iran-launches-crackdown-women-defying-hijab-dress-codercna151406; Iran: Draconian campaign to enforce compulsory veiling laws through surveillance and mass car confiscations, Amnesty International (6 Mar. 2024), https://www.amnesty.org/en/latest/news/2024/03/iran-draconiancampaign-to-enforce-compulsory-veiling-laws-through-surveillance-andmass-car-confiscations/.

posting unveiled photos on social media.46

B. Ongoing International Investigations

In November 2022, the UN Human Rights Council adopted a resolution to establish the Independent International Fact-Finding Mission on the Islamic Republic of Iran (FFMI or Mission) for a period of one year.⁴⁷ In April 2024, the Mission's mandate was renewed for an additional year. The FFMI's mandate is to "thoroughly and independently investigate alleged human rights violations in the Islamic Republic of Iran related to the protests that began on 16 September 2022, especially with respect to women and children," to establish facts relating to alleged violations; to collect, analyze and preserve evidence with a view to cooperating with future legal proceedings; and to engage with relevant stakeholders as it conducts its investigation.⁴⁸

In March 2024, the FFMI released its first report.⁴⁹ The FFMI had conducted an extensive investigation relying on laws, official regulations and policies, documents issued by the Iranian judiciary, interviews with victims and witnesses, independent reports, medical documents, verified photographs and videos, and satellite imagery.⁵⁰ It analyzed the use of force by security forces; detentions; torture and cruel, inhuman, or degrading treatment; sexual and gender-based violence; sham trials and the use of the death penalty; the targeting of ethnic and religious minorities; and other protest-related issues.

The FFMI ultimately found that Iranian authorities

46 UN Office of the High Commissioner for Human Rights, Iran: Crackdown on hijab law (26 Apr. 2024), https://www.ohchr.org/en/pressbriefing-notes/2024/04/iran-crackdown-hijab-law#:~:text=UN%20High%20 Commissioner%20for%20Human%20Rights%20Volker%20T%C3%BCrk%20 calls%20on,human%20rights%20norms%20and%20standards; Shadi Sadr, Iran's Hijab and Chastity Bill Underscores the Need to Codify Gender Apartheid, Just Security (11 Apr. 2024), https://www.justsecurity.org/94504/ iran-hijab-bill-gender-apartheid/.

47 Human Rights Council Res. 35/1, UN Doc. A/HRC/RES/S-35/1 (29
Nov. 2022). https://undocs.org/A/HRC/RES/S-35/1; UN Human Rights
Council, Independent International Fact-Finding Mission on the Islamic
Republic of Iran, https://www.ohchr.org/en/hr-bodies/hrc/ffm-iran/index.
48 UN Human Rights Council, Independent International Fact-Finding
Mission on the Islamic Republic of Iran, https://www.ohchr.org/en/hr-bodies/
hrc/ffm-iran/index.

49 Press Release, Office of the High Commissioner for Human Rights, Iran: Institutional discrimination against women and girls enabled human rights violations and crimes against humanity in the context of recent protests, UN Fact-Finding Mission says, UN Press Release (8 Mar. 2024).

50 Detailed findings of the independent international fact-finding mission on the Islamic Republic of Iran, UN HRC, 55th Sess., UN Doc. A/HRC/55/ CRP.1, ¶ 6 (19 Mar. 2024).

had committed "serious human rights violations" such as "violations of the rights to life, not to be subjected to torture and ill-treatment, to security and liberty of the person, to a fair trial and due process, to an effective remedy, to freedom of religion or belief, of expression, of peaceful assembly and of association, and the rights to privacy, health, education, livelihood and work."51 Additionally, the FFMI found violations of "the right to equality and non-discrimination on the grounds of sex, gender, age, religion or belief, political or other opinions," which were especially severe as applied to women, children, and ethnic and religious minorities.⁵² The Mission noted that "in implementing State policy, the security forces have used persecutory conduct, including rape and other forms of sexual and gender-based violence, with the intention of discriminating against women and girls and men and boys supporting demands for gender equality and LGBTQI+ persons, in order to silence, deter and punish the protesters and their supporters."53

The Mission further found that many of the serious human rights violations committed by the IRI amount to crimes against humanity. Specifically, the FFMI found that the crimes against humanity of "murder, imprisonment, torture, rape and other forms of sexual violence, persecution, enforced disappearance and other inhumane acts" were "committed as part of a widespread and systematic attack directed against a civilian population, namely women, girls and others expressing support for human rights."54 Given the context of discriminatory deprivation of fundamental rights, the FFMI concluded that the crime against humanity of persecution on the grounds of gender had also been committed, intersecting with discrimination on religious and ethnic grounds.⁵⁵ It observed that the crimes committed by IRI agents were not random or spontaneous acts, but rather "part of a pattern of organized conduct, following instructions, encouragement and endorsement by high-level State authorities and senior members

⁵¹ Id. ¶ 105.

⁵² Id. ¶ 106.

⁵³ Id. ¶ 107.

⁵⁴ Id. 9 107.

⁵⁵ Id.

of State institutions, and implemented by a large number of physical perpetrators."⁵⁶ Given the continuing impunity and failure of the Islamic Republic to take action, the Mission concluded that these crimes were committed as part of a state policy.⁵⁷

The FFMI highlighted the absence of viable domestic remedies for victims of human rights violations and international crimes inside Iran.⁵⁸ It found that the investigations IRI authorities had announced did not meet applicable international human rights standards and the Mission could not identify any criminal investigations or prosecutions of perpetrators responsible for the human rights violations covered in its report.⁵⁹ Further, the FFMI noted the role judges, prosecutors, some defense lawyers, and other members of the judiciary played to "deny and conceal violations, shield the perpetrators and punish and silence those seeking accountability."⁶⁰

Against this situation of continuing impunity, the FFMI observed that international and domestic avenues outside Iran are the only viable options for accountability.⁶¹ It stressed the important role of third states that can initiate proceedings at the International Court of Justice, for example, or exercise universal jurisdiction domestically.

The FFMI also noted the potential of third states to open structural investigations, establish and participate in a joint investigation team, track perpetrators, and submit requests for information and judicial assistance,⁶² including from the FFMI itself.⁶³ In addition to the information contained in its main report and conference room paper, the FFMI has collected information on the identity and responsibility of individual perpetrators, which it has kept confidential. That information is only available to national authorities that make the appropriate legal assistance requests.⁶⁴

- 58 Id. ¶ 116-118.59 Id. ¶ 117.
- 60 Id. ¶117.

- 62 Id. ¶119-120.
- 63 Id. ¶ 119.
- 64 Id. ¶ 115.

C. Iranian Archive & Iran Digital Archive Coalition

The calls for accountability from Iranian civil society are clear.⁶⁵ Despite great personal risk, people in Iran have documented the abuses committed by the IRI and actively shared them online for the world to see.66 The material they have shared will be invaluable to future accountability proceedings, but only if it remains available. User-generated content documenting atrocities is vulnerable to removal from social media platforms either by the users who uploaded it due to pressure from government authorities, or increased danger to their safety or that of loved ones, or by companies that own the platforms on which the material is shared. Media reporting may be removed or links broken, making content inaccessible.67

As a result, a coalition of organizations came together to contribute to the creation of the Iranian Archive led by Mnemonic to preserve the open source content people in Iran risked so much to share online and ensure that preservation complies with legal standards in order to maximize the value of that content for court. The Iranian Archive was created by Mnemonic, in partnership with other members of the Iran Digital Archive Coalition including the Atlantic Council's Strategic Litigation Project, the Digital Investigations Lab at UCLA School of Law, UC Berkeley's Human Rights Center, Amnesty International's Digital Verification Corps, the Iran Human Rights Documentation Center, and the Azadi Archive, as well as Civil Rights Defenders, which has an

⁵⁶ Id. ¶ 109.

⁵⁷ Id. ¶110.

⁶¹ Id. ¶119.

⁶⁵ UN Office of the High Commissioner for Human Rights, "Woman, Life, Freedom" survivors want to end State impunity in Iran, https://www. ohchr.org/en/stories/2024/03/woman-life-freedom-survivors-want-endstate-impunity-iran.

⁶⁶ Cameran Ashraf, Iranians sacrificed their lives to share videos of regime violence. Now there's an online archive for the world to see., Atlantic Council (12 Apr. 2024), https://www.atlanticcouncil.org/blogs/iransource/ mahsa-amini-access-now-iranian-archive-human-rights/.

⁶⁷ See, e.g., "Video Unavailable", Human Rights Watch (10 Sept. 2020), https://www.hrw.org/report/2020/09/10/video-unavailable/social-mediaplatforms-remove-evidence-war-crimes.

independent collaboration with Mnemonic.⁶⁸ Approximately two million digital records have been preserved thus far that document human rights violations and atrocity crimes committed in the context of the Woman, Life, Freedom protests. In addition to preserving and analyzing this open source material, the Iranian Archive will offer support to future investigations and accountability proceedings.

The Coalition is releasing a series of publications analyzing some of the material that has been preserved in the Iranian Archive. The initial reports in the series document and analyze the targeted blinding of protesters and bystanders, the enforced disappearance of children and subsequent harassment of their families by IRI officials, and the crime against humanity of gender persecution. While each report utilizes a unique methodology, they nonetheless share a foundational approach.

The teams behind each report relied on open source material preserved in the Iranian Archive. The specific open source material analyzed varies by report, but mainly consists of photos, videos, and text uploaded to various social media platforms. This is supplemented by news items from inside and outside Iran, and credible reporting from human rights organizations. The material preserved in the Archive can emanate from anywhere, but must relate to events that took place inside Iran and have a demonstrable link to the Woman, Life, Freedom protests, from September 2022 onwards. In designing the investigations and verifying the open source material, authors followed the methodologies outlined in the Berkeley Protocol on Digital Open Source Investigations.⁶⁹

At the time of research, all the material included in these reports was open source and publicly accessible. Some content may have been removed since the publication of these reports, but a copy of all artifacts are preserved in the Iranian Archive. None of the authors of this report have interviewed witnesses or otherwise contacted any victims, survivors, or their families. This decision was made to avoid doing additional harm to victims and survivors or to their families and friends. As one of the reports makes clear, families of victims and survivors have been subjected to threats, harassment, and intimidation to prevent them from speaking out. In addition, case studies were selected in conjunction with a multi-stage security review of the potential risk to the victim of including their story, and survivor locations were kept general so as to minimize contributing to any risk of retaliation.

The Iranian Archive and partners in the Iran Digital Archive Coalition have submitted information and analysis of serious violations to the FFMI to assist the investigation that resulted in the FFMI's March 2024 report.⁷⁰

Human rights coalition unveils digital catalog of evidence pointing towards crimes against humanity committed against Iranian protesters, Atlantic Council (18 Mar. 2024), https://www.atlanticcouncil.org/news/pressreleases/human-rights-coalition-unveils-digital-catalog-of-evidence-pointingtowards-crimes-against-humanity-committed-against-iranian-protesters/.
 The Berkeley Protocol on Digital Open Source Investigations (UN

Human Rights Office and UC Berkeley Human Rights Center 2022) is a set of guidelines for conducting investigations using publicly-accessible online content. The Berkeley Protocol is available in all six official languages of the United Nations at the United Nations Human Rights Office Website at https:// www.ohchr.org/en/publications/policy-and-methodological-publications/ berkeley-protocol-digital-open-source.

⁷⁰ Press Release, Office of the High Commissioner for Human Rights, Iran: Institutional discrimination against women and girls enabled human rights violations and crimes against humanity in the context of recent protests, UN Fact-Finding Mission says, UN Press Release (8 Mar. 2024)

II. A Brief History of Enforced Disappearance and Information Suppression by the Islamic Republic of Iran

The Islamic Republic of Iran has a long history of oppressing citizens who protest against state action, often resulting in enforced disappearance, imprisonment, or death. The regime has a similarly long record of suppressing information about the true nature of harms suffered by victims of state behavior. Over time, the Islamic Republic has used a number of different methods to suppress information of those disappeared and killed, including utilizing state media to publish forced confessions and contradictory claims, online censorship and surveillance, and internet shutdowns.⁷¹ There are numerous documented instances of state officials threatening family members with arrest or detention, coercing them to make false statements which are then publicized, and denying information about the true nature of what happened to the victims. Additionally, in many cases, officials have withheld victims' bodies, prevented families from holding public memorials, forced them to bury their loved ones at night or under heavy

security presence, and arrested and prosecuted several family members for seeking justice. This

section will outline some examples of the various methods of information suppression that have been employed by the Islamic Republic after significant protests and mass executions since the early 1980s, which show a pattern of state behavior.⁷² This section does not include more isolated incidents of information suppression, which have been documented elsewhere.

The practice of information suppression by the Islamic Republic can be traced back to the months following the 1979 revolution, when writers and newspapers were targeted and suppressed by the newly established regime.⁷³ This pattern was exacerbated by the Cultural Revolution, the nationwide university shutdown, the mass executions of political prisoners in 1981-1982, and most notably, the 1988 executions of political prisoners that began during the final months of the Iran-Iraq War.⁷⁴ At that time, prison visits were suddenly halted, and prisoners detained for

⁷¹ Sanam Mahoozi, *FEATURE-Iran steps up internet crackdown one year after Mahsa Amini death*, Reuters (Sept. 14, 2023), https://www. reuters.com/article/idUSL8N3AJ203/; *See also Iran: New tactics for digital repression as protests continue*, Article 19 (Nov. 17, 2022), available at https:// www.article19.org/resources/iran-new-tactics-for-digital-repression-asprotests-continue/; *See also A Web of Impunity; The killings Iran's internet shut down hid*, Amnesty International (Nov. 16, 2020), available at https:// iran-shutdown.amnesty.org/; *See also Iran: Bullets, detention and shutdowns: the authorities' response to protests in Khuzestan*, Article 19 (Jul. 28, 2021), available at https://www.article19.org/resources/iran-bullets-detentionand-shutdowns-the-authorities-response-to-protests-in-khuzestan/; *See also* Maryam Sinaiee, *Iranian Protest Victim's Family Forced Into Televised Confessions*, Iran International (Oct. 6, 2022), available at https://www. iranintl.com/en/202210061173.

⁷² Ayin Nameh Nahveh Ejraye Ahkam Hudud, Salbe Hayat, Ghat-e Ozv, Qisas Nafs va Ozv va Jarh, Diyat, Shalaq, Tabeed, Nafye Balad, Eqamat-e Ejbari va Mane Az Eqamat Dar Mahal Ya Mahal Haye Moayan-Mosavab [Regulatory Code on Sentences of Qisas, Stoning, Crucifixion, Execution, and Flogging], Tehran 1398 [2019], art. 7(8) and 43(h).

Aida Ghajar, Blood-Soaked Fatwas: How Khomeini Turned Homicide 73 Into Policy in Iran, IranWire (June 9, 2022), https://iranwire.com/en/ politics/104686-blood-soaked-fatwas-how-khomeini-turned-homicideinto-policy-in-iran-in-10-years/; See also Lawdan Bazargan, Unveiling The Darkness: The 1981 Massacre In Post-Revolutionary Iran, Iran International (Feb. 15, 2024), available at https://www.iranintl.com/en/202402150309. Lawdan Bazargan, Unveiling The Darkness: The 1981 Massacre 74 In Post-Revolutionary Iran, Iran International (Feb. 15, 2024), https:// www.iranintl.com/en/202402150309; See also Iran: New evidence reveals deliberate desecration and destruction of multiple mass gravesites, Amnesty International (Apr. 30, 2018), available at https://www.amnesty.org/en/ latest/news/2018/04/iran-new-evidence-reveals-deliberate-desecrationand-destruction-of-multiple-mass-gravesites/; See also Iran: Violations of human rights 1987 - 1990, Amnesty International (Dec. 1, 1990), available at https://www.amnesty.org/en/documents/mde13/021/1990/en/.

political reasons could not be contacted.⁷⁵ Reports began circulating that prisoners were being executed in groups and buried in unmarked mass graves.⁷⁶ The state refused to publicly acknowledge the extrajudicial executions, disclose the fate of the victims (including the circumstances of their deaths), identify the remains, and ensure that they were returned to families.⁷⁷ Many families were not provided death certificates. Others received death certificates that were inaccurate, misleading, or incomplete concerning the causes, circumstances, and dates of the deaths.78 Authorities beat and detained those who tried to lay flowers at mass grave sites, forced families to sign undertakings that they would not hold commemorations, and destroyed headstones, flowers, or other memorials placed by the families to mark the death of their loved ones.⁷⁹ Domestically, the authorities concocted different stories to disguise, distort and "justify" the killings.⁸⁰ Between 1988 and 1990, Iranian diplomats around the world made similar and sometimes identical comments, dismissing reports of mass executions in 1988 as "propaganda from opposition groups."81

There are many more contemporary examples of information suppression by the regime. For example, in 2016, 25 Sunni men accused of national security related crimes were killed in a mass execution without their families being notified.⁸² Amnesty International reported that in the hours and days following, the Iranian authorities "embarked on a media campaign intended to dehumanize the executed men in the eyes of the public and justify their executions."⁸³ Families were not allowed to take their loved ones' bodies away for private burials; instead, Ministry of Intelligence

 Iran: Broadcasting injustice, boasting of mass killing: A case study of August 2016 execution of 25 Sunni men in Iran, Amnesty International (Nov. 17, 2016), https://www.amnesty.org/en/documents/mde13/5079/2016/en/.
 Id officials took them to a cemetery in Tehran,⁸⁴ and harassed and threatened family members with detention if they held memorial ceremonies or discussed what had happened.⁸⁵

There was also heavy information suppression connected to the November 2019 protests during which the Islamic Republic's security forces employed lethal force over five days, killing and detaining hundreds of protesters and bystanders.⁸⁶ A weeks-long total internet shutdown was imposed across many parts of the country.87 Amnesty International has detailed several instances of restrictions on victim memorial ceremonies, restrictions on peaceful gatherings by relatives, and arbitrary arrests and detentions for family members that spoke out.⁸⁸ In particular, they detail a larger phenomenon where families of minors killed in the protests were intimidated by the state to prevent them from speaking openly about their family members' deaths.⁸⁹ Although names were not listed, the report states that "most have reported being forced to sign undertakings that they would not speak to the media and would observe restrictions on how they commemorate their loved ones in order to be able to receive their bodies."90 There were also reported patterns of state officials attempting to suppress incriminating

⁷⁵ Id.

⁷⁶ Id.77 Id.

⁷⁸ Id.

⁷⁹ Id.

⁸⁰ Id.

⁸¹ Iran: Shameful anniversary celebrations amid decades of mass killings and cover-ups, Amnesty International (Feb. 6, 2023), https://www.amnesty.org/en/latest/news/2023/02/iran-shameful-anniversary-celebrations-amid-decades-of-mass-killings-and-cover-ups/; *See also Relatives Of 80s Iran Victims Insist On Expulsion Of Oberlin Professor*, Iran International (Feb. 7, 2023), available at https://www.iranintl.com/en/20230273340.

⁸⁴ Id.

⁸⁵ Id.

⁸⁶ Iran: Authorities violating absolute prohibition of torture through harassment of witnesses involved in Iran Atrocities Tribunal, Amnesty International (Apr. 7, 2022), https://www.amnesty.org/en/documents/ mde13/5441/2022/en/. See also Iran: Tightening the Net 2020, Article 19, available at https://www.article19.org/ttn-iran-november-shutdown/ (last visited May 29, 2024).

⁸⁷ Iran: Authorities violating absolute prohibition of torture through harassment of witnesses involved in Iran Atrocities Tribunal, Amnesty International (Apr. 7, 2022), https://www.amnesty.org/en/documents/ mde13/5441/2022/en/. See also Iran: Tightening the Net 2020, Article 19, available at https://www.article19.org/ttn-iran-november-shutdown/ (last visited May 29, 2024).

⁸⁸ Iran: Authorities violating absolute prohibition of torture through harassment of witnesses involved in Iran Atrocities Tribunal, Amnesty International (Apr. 7, 2022), https://www.amnesty.org/en/documents/ mde13/5441/2022/en/. Pouya Bakhtiari, as an example, was gunned down by security forces in Karaj, Alborz Province, during the 2019 protests. Following his death, several of his relatives, including his parents, were arrested and accused of acting against national security for seeking justice for their son. Both of them have been sentenced to imprisonment. *See Pouya Bakhtiari's Ailing Father Transferred to Qazvin Prison*, IranWire (Jul. 21, 2022), available at https://iranwire.com/en/november-2019-protests/105906-pouyabakhtiaris-ailing-father-transferred-to-qazvin-prison.

⁸⁹ Iran: 'They shot our children': Killings of minors in Iran's November 2019 protests, Amnesty International (Mar. 4, 2020), https://www.amnesty.org/en/documents/mde13/1894/2020/en/.

⁹⁰ Id.

evidence, including through families being forced to bury their children quickly in front of security officials (preventing them from seeking independent autopsies), being refused access to the findings of autopsies conducted by state forensic institutes, and being denied access to information on the circumstances surrounding their children's deaths.⁹¹ Other families reported that officials generally sought to prevent family members from pulling back the shrouds to see the bodies of their loved ones, meaning they could not see the impact of injuries.⁹²

Amnesty International has also found a systematic concealment of the fate and whereabouts of victims from their relatives.⁹³ Some families were told their missing relatives were not in custody and that officials had no information pertaining to their whereabouts; others were told their family members were in custody, but officials refused to disclose where they were being held.⁹⁴ In many cases, families were threatened with arrest if they returned to seek information, spoke with the media, retained an attorney, or consulted human rights groups.⁹⁵

After the November 2019 protests, civil society organizations and international legal experts established a non-judicial International People's Tribunal on Iran's Atrocities.⁹⁶ Amnesty International has documented many instances in which state authorities carried out reprisals against both witnesses and their families shortly after these public hearings, which took place from November 10 to 14, 2021, and February 4 to 6, 2022.⁹⁷

On January 8, 2020, the IRGC, which operates under the direct command of the Supreme Leader, shot down Ukraine International Airlines Flight 752, resulting in the tragic deaths of 176 passengers and crew, plus one unborn child.98 Initially, the Islamic Republic denied any involvement but later admitted responsibility when undeniable evidence emerged. In an effort to control the narrative and suppress negative information, the Islamic Republic officials engaged in a coordinated campaign of harassment and, at times, physical torture. The Islamic Republic's security forces interfered with burial and memorial services, with some officers actively participating in burial rituals without the consent of the victims' families. Families were threatened to discourage their participation in foreign media interviews, and there were instances of interrogations and detentions of family members. Authorities threatened three families with "consequences" unless they removed social media posts critical of the Islamic Republic. Additionally, there are reports that one individual was tortured for speaking out.99

The Islamic Republic also pressured families to accept the official designation of "Shahīd (martyr)" as a distraction from calls for accountability. ¹⁰⁰Within the Islamic Republic's ideological framework, the term "Shahīd (martyr)" is reserved for those who die defending the state and its values.¹⁰¹ Shortly after the 1979 revolution, Bonyad Shahid va Omur-e Ithargaran (the Foundation of Martyrs and Veterans Affairs) was established to provide official recognition, financial support, and social programs to families of those who fell in defense of the regime.¹⁰² In recent years, the Islamic Republic has broadened its definition of a martyr,

⁹¹ Id.

⁹² Id.

⁹³ Iran: Trampling Humanity – Mass arrests, disappearances, and torture since Iran's 2019 November protests, Amnesty International (Sept. 2, 2020), https://www.amnesty.org/en/documents/mde13/2891/2020/en/.

⁹⁴ Id. 95 Id.

⁹⁶ Iran: Authorities violating absolute prohibition of torture through harassment of witnesses involved in Iran Atrocities Tribunal, Amnesty International (Apr. 7, 2022), https://www.amnesty.org/en/documents/ mde13/5441/2022/en/.

⁹⁷ *Id. See* the cases of Amin Ansarifar, the family of Aram Madoukhi, and the family of Alireza Barekati.

⁹⁸ Hossein Bastani, *Parvandih Maḥramānih Havāpīymāyi Okrāyīnī - Byīn Suţūr [The Secret File of the Ukrainian Flight - Read Between the Lines]*, BBC Persian (Jan. 8, 2024), https://www.bbc.com/persian/articles/cl4er60exr20; *See also The Downing of Ukraine International Airlines Flight 752: Factual Analysis*, Official website of the Government of Canada (June 24, 2021), available at https://www.international.gc.ca/gac-amc/publications/flight-vol-ps752/factual_analysis-analyse_faits.aspx?lang=eng; *See also* The Lonely Fight for Justice, ps752justice, available at https://www.ps752justice.com/publishing/the-lonely-fight-for-justice/ (last visited Jul. 31, 2024).

⁹⁹ Iran: Ukraine Airline Victims' Families Harassed, Abused, Human Rights Watch (May 27, 2021), https://www.hrw.org/news/2021/05/27/iran-ukraine-airline-victims-families-harassed-abused.

¹⁰⁰ *Iran: Ukraine Airline Victims' Families Harassed, Abused,* Human Rights Watch (May 27, 2021), https://www.hrw.org/news/2021/05/27/iran-ukraine-airline-victims-families-harassed-abused.

¹⁰¹ Unleashed Violence: Repression of Protests in Kurdish Areas of Iran-September 2022 - December 2022, Iran Human Rights Documentation Center (June 30, 2023), https://iranhrdc.org/protests-in-the-kurdish-areas-of-iran/#_ ftnref469.

¹⁰² *Id. Bonyad Shahid va Omur-e Ithargaran* (the Foundation of Martyrs and Veterans Affairs)'s reach grew significantly during the Iran-Iraq War (1980-88), a conflict that claimed hundreds of thousands of lives.

extending financial aid to civilians caught in the clashes between state forces and anti-government protesters.¹⁰³ When families of individuals killed by security forces are pressured into accepting the designation of Shahīd for their loved ones, it not only obscures the true nature of their involvement in protests but also portrays them as supporters of the Islamic Republic. This further reinforces the state's false narrative surrounding their deaths.¹⁰⁴

In July 2021, during protests that erupted over severe water shortages, security forces killed at least eight protesters and bystanders in various cities across the country.¹⁰⁵ On July 17 and 18, Fars News Agency, which is affiliated to the IRGC, published video interviews with relatives of two victims of the protests, in which the families claimed the victims were not the type to get involved in "riots."106 In its reporting, Amnesty International said that it had received "numerous eyewitness accounts indicating the authorities' use of plain-clothes agents to pose as armed or violent protesters."107 The report cites an additional source that states a victim's family was visited by plain-clothes intelligence agents not long after his death, and that the family was coerced into reciting a prepared script on camera.¹⁰⁸

In May 2022, following largely peaceful protests in the southwest of Iran over soaring food prices and the deadly collapse of a building, Amnesty International reported that at least three people were killed, and noted concerns of contradictory claims by state media outlets, coerced statements by family members, and withholding of a victim's body.¹⁰⁹ The state also imposed localized internet shutdowns and disrupted mobile networks.¹¹⁰

The above are just a few examples of individuals being subjected to enforced disappearance by the Islamic Republic and the suppression of information related to the circumstances surrounding the deaths of those disappeared. We see similar actions taken to suppress information about the deaths or disappearances of numerous minors during the protests that began following the death of Mahsa "Jina" Amini on September 16, 2022. These actions are the focus of this report.

¹⁰³ Id.

¹⁰⁴ Raha Bahreini, "Shahīd Sāzī" Rasmī Az Kushti Shudigān 'tirāżāt Ābān 98: Sīyāsatī Barāy Takrīm Enfiʿāl [Official Fabrication of 'Martyr' of Those Who Were Killed in the November 2019 Protests: a Policy to Honor Passivity], BBC Persian (May 30, 2020), https://www.bbc.com/persian/blogviewpoints-52832253.

¹⁰⁵ Iran: Security forces use live ammunition and birdshot to crush Khuzestan protests, Amnesty International (Jul. 23, 2021), https://www. amnesty.org/en/latest/news/2021/07/iran-security-forces-use-liveammunition-and-birdshot-to-crush-khuzestan-protests-2/.

¹⁰⁶ Pidari Javān Shādigānī: Kharāb Kārān Bi Pisaram Tīr Zadand [The Father of Shadgani's Young Man: "Rioters Shot My Son"], Aparat, https://www. aparat.com/v/n26da4n (last visited on May 22, 2024) [depicting the family of an individual killed in Khuzestan repeating the state's narrative in a report by Fars News Agency].

Iran: Security forces use live ammunition and birdshot to crush 107 Khuzestan protests, Amnesty International (Jul. 23, 2021), https://www. amnesty.org/en/latest/news/2021/07/iran-security-forces-use-liveammunition-and-birdshot-to-crush-khuzestan-protests-2/.

Iran: They are shooting brazenly: Iran's militarized response to May 2022 109 protests, Amnesty International (Aug. 3, 2022), https://www.amnesty.org/en/ documents/mde13/5789/2022/en/. Id.

III. Legal Framework Applicable to the Islamic Republic of Iran

The Islamic Republic of Iran has signed and ratified the International Covenant on Civil and Political Rights (ICCPR), the International Covenant on Economic, Social, and Cultural Rights (ICESCR), the Convention on the Elimination of All Forms of Racial Discrimination (CERD), and the Convention on the Rights of the Child (CRC). The Islamic Republic is not a party to the Convention Against Torture (CAT) or the Convention on the Protection of All Persons from Enforced Disappearance (ICPPED). Iran is also not a party to the Rome Statute of the International Criminal Court (Rome Statute), and so is not subject to the jurisdiction of the court. The Islamic Republic is, however, bound by customary international law norms, including jus cogens norms - the unwritten rules of international law based on state practice and opinio juris that bind all states.

This section details some of the rights and freedoms that have been impacted by the actions of security forces since the beginning of the Woman, Life, Freedom protest movement, including but not limited to: (A) the prohibition of enforced disappearance; (B) the right to freedom from arbitrary detention; (C) the right to freedom from torture; (E) prohibition of gender persecution; (F) the right to assembly and association; (G) the right to freedom of expression, and; (H) the right to truth.

A. Prohibition of Enforced Disappearance

Enforced disappearance occurs when persons are arrested, detained, or suffer any other form of deprivation of liberty by agents of the State, or by persons or groups of persons acting with the authorization, support, or acquiescence of the State, followed by a refusal to acknowledge the deprivation of liberty or by the concealment of the fate or whereabouts of the disappeared person.¹¹¹ While there is treaty law on enforced disappearance, namely the International Convention on the Protection of All Persons from Enforced Disappearance (ICPPED) which entered into force in 2010, the Islamic Republic is not a party.¹¹² The Declaration on the Protection of all Persons from Enforced Disappearance, adopted by the UN General Assembly in 1992, is widely viewed as reflective of customary international law which is binding on all states, including the Islamic Republic of Iran.¹¹³

There are three cumulative elements of enforced disappearance: (1) deprivation of liberty against the will of the person; (2) involvement of government officials, at least by acquiescence; and (3) refusal to acknowledge the deprivation of liberty or concealment of the fate or whereabouts of the disappeared person.¹¹⁴ With respect to the third element, according to the Working Group on Enforced or Involuntary Disappearances ("the WGEID"), both the lack of such information and any impediments to access information about what happened to the disappeared person are considered violations.¹¹⁵ This refers not just to whether a victim is alive or dead, but also the details of what happened.¹¹⁶ A refusal to

114 Rep. of the Working Group on Enforced or Involuntary

Disappearances, ¶ 26, U.N. Doc. E/CN.4/1997/34 (Dec. 13, 1996).

¹¹¹ G.A. Res. 47/133, Declaration on the Protection of all Persons from Enforced Disappearance (Dec. 18, 1992).

¹¹² U.N. Office of the High Commissioner for Human Rights, Ratification of 18 International Human Rights Treaties, https://indicators. ohchr.org/.

Press Release, Office of the High Commissioner for Human Rights,30th Anniversary of the Declaration on the Protection of All Persons fromEnforced Disappearance, U.N. Press Release (Dec. 18, 2022).

Disappearances, Best Practices on Enforced Disappearances in Domestic Criminal Legislation, at 21, U.N. Doc A/HRC/16/48/Add.3 (Dec. 28, 2010). 115 Rep. of the Working Group on Enforced or Involuntary

¹¹⁶ Rep. of the Working Group on Enforced or Involuntary Disappearances, Follow-up to the recommendations made by the Working Group on Enforced or Involuntary Disappearances in the report of its visit to Kyrgyzstan from 25 to 30 June 2019, U.N. Doc A/HRC/57/54/Add.2 (July 12, 2024).

acknowledge the role of state actors in a death means that the state is concealing the fate of the victim.

The WGEID has also stated that "enforced disappearances are prototypical continuous acts."¹¹⁷ The act begins at the time of the abduction, and extends for the entirety of the time that the crime is not complete, that is, until the State acknowledges the detention, or releases information pertaining to the fate or whereabouts of the individual.¹¹⁸ In other words, the crime continues so long as the perpetrators continue to conceal the individual's fate or whereabouts.

The WGEID has emphasized that enforced disappearance infringes upon a number of other rights guaranteed under the ICCPR, which is binding on the Islamic Republic of Iran as a state party, including the right to recognition as a person before the law (Art. 16); the right to liberty and security of the person (Art. 9); the right not to be subjected to torture and other cruel, inhuman, or degrading treatment or punishment (Art. 7); the right to life (Art. 6), when the disappeared person is killed; the right to a fair trial and to judicial guarantees (Art. 14); and the right to an effective remedy (Art. 2), including reparation and compensation.¹¹⁹ In addition, enforced disappearances violate both the individual and collective right to truth.

Enforced disappearance also impacts rights guaranteed by the ICESCR, again binding on the Islamic Republic as a state party, including the right to protection and assistance to the family (Art. 10); the right to an adequate standard of living (Art. 11); the right to health (Art. 12); and the right to education (Art. 13).¹²⁰ The enforced disappearance of a child violates a number of additional provisions

of the CRC that the Islamic Republic is bound by, including the right to a personal identity (Art. 8), the right not to be separated from his or her parents against their will (Art. 9), the right to not be subject to arbitrary or unlawful interference with one's privacy, family, and correspondence (Art. 16), the prohibition on unlawfully or arbitrarily depriving a child of their liberty (Art. 37(b)), the right of children deprived of liberty to maintain contact with his or her family (Art. 37(c)), and the right of children deprived of liberty to have prompt access to legal and other appropriate assistance (Art. 37(d)).¹²¹ In addition, the WGEID's General Comment No. 12 recognizes that the enforced disappearance of a child is an "extreme form of violence against children" and constitutes an exacerbation of the violation of the multiplicity of rights protected.122

The WGEID has repeatedly stated that, in cases of enforced disappearance, a wide and comprehensive definition of "victim" should be used, and should not distinguish between direct and indirect victims.123 This interpretation allows for the family to be considered victims, in addition to the disappeared person(s). As stated in General Comment No. 13: "A comprehensive definition should recognize that family members of the disappeared are also victims because they endure unique forms of suffering as a direct result of the disappearance."124 In addition, General Comment No. 12 states that accurate information concerning the detention of children, and their place or places of detention, should be made promptly available to their family members.¹²⁵

It is important to note that both the Committee on Enforced Disappearances and the WGEID

¹¹⁷ Rep. of the Working Group on Enforced or Involuntary Disappearances, ¶ 39, at 11, U.N. Doc. A/HRC/16/48 (Jan. 16, 2011).

¹¹⁸ Id.

¹¹⁹ G.A. Res. 2200A (XXI), International Covenant on Civil and Political Rights, art 2, 6, 7, 9, 14, 16, (Dec. 16, 1966); Working Group on Enforced or Involuntary Disappearances, International Standards on Enforced or Involuntary Disappearances, https://www.ohchr.org/en/special-procedures/ wg-disappearances/international-standards-enforced-or-involuntarydisappearances.

¹²⁰ G.A. Res 2200A (XXI), International Covenant on Economic, Social and Cultural Rights, art 10, 11, 12, 13, (Dec. 16, 1966); Working Group on Enforced or Involuntary Disappearances, International Standards on Enforced or Involuntary Disappearances, https://www.ohchr.org/en/special-procedures/ wg-disappearances/international-standards-enforced-or-involuntarydisappearances.

<sup>G.A. Res 44/25, Convention on the Rights of the Child, art 8,
16, 37, (Nov. 20, 1989); Working Group on Enforced or Involuntary
Disappearances, International Standards on Enforced or Involuntary
Disappearances, https://www.ohchr.org/en/special-procedures/
wg-disappearances/international-standards-enforced-or-involuntarydisappearances; Promotion and Protection of Human Rights, Study on the
Right to Truth, Rep. of the OHCHR, at 27, U.N. Doc E/CN.4/2006/91 (Feb. 8, 2006).</sup>

<sup>Rep. of the Working Group on Enforced or Involuntary
Disappearances, 9 9, U.N. Doc. A/HRC/WGEID/98/1 (Feb. 14, 2013).
Rep. of the Working Group on Enforced or Involuntary</sup>

Disappearances, ¶ 38, U.N. Doc. A/HRC/WGEID/98/2 (Feb. 14, 2013). 124 Id.

¹²⁵ Rep. of the Working Group on Enforced or Involuntary Disappearances, ¶ 13, U.N. Doc. A/HRC/WGEID/98/1 (Feb. 14, 2013).

make clear that there is no duration requirement for an enforced disappearance to occur:¹²⁶ "Every minute counts when a person is placed outside the protection of the law. And when a person has disappeared, every minute of anguish spent by his or her relatives without news of him or her is too much."¹²⁷

The offense of enforced disappearance may be initiated by an illegal detention, or by an initially legal arrest or detention, following which the state conceals the whereabouts or fate of the individual.¹²⁸ In addition, a detention that is followed by an extrajudicial execution is still an enforced disappearance, so long as it was carried out by governmental agents and, subsequent to detention, state officials refused to disclose the fate or whereabouts of the person, or "refuse to acknowledge the act having been perpetrated at all."129 The protection of a victim from enforced disappearance "must be effective upon the act of deprivation of liberty, whatever form such deprivation takes, and not be limited to cases of illegitimate deprivations of liberty," demonstrating that either scenario may be sufficient to meet the "deprivation of liberty" requirement established in the general definition.130

Enforced disappearance may also be considered a crime against humanity when it is carried out as part of a widespread or systematic attack directed against any civilian population.¹³¹ In the context of crimes against humanity, attacks directed against civilian populations need not be military and are defined as a course of conduct, involving multiple commissions of the act, against a civilian population, in furtherance of a State or organizational policy to carry out said attack.¹³²

B. Freedom from Arbitrary Detention

The right to liberty and security of a person, including the freedom from arbitrary arrest or detention, is established in Article 9(1) of the ICCPR, to which Iran is a state party.¹³³ Freedom from arbitrary detention is also considered a peremptory norm of international law,¹³⁴ and there can be no legitimate derogations as arbitrary detention can never be necessary and proportionate.¹³⁵ Detention may be arbitrary if an individual is deprived of their liberty outside of the procedures of the law, including a failure to be informed of cause for arrest, failure to be promptly brought before a judge, or the general denial of proceedings before a court.136 Arrest or detention as punishment for the legitimate exercise of the rights guaranteed under the ICCPR, including the freedoms of expression, opinion, assembly, and association, constitutes an arbitrary arrest or detention.137 In addition, enforced disappearances, given that they violate numerous substantive and procedural provisions of the ICCPR, constitute a particularly aggravated form of arbitrary detention.138

C. Freedom from Extrajudicial Killings

"Without respect for the right to life, no other human right can be upheld."¹³⁹

Extrajudicial, or arbitrary, executions violate

¹²⁶ Multiple Mechanisms, Call for Inputs with a View to Issuing a Joint Statement on the Notion of Short-Term Enforced Disappearance, 1 (Aug. 16, 2023), https://www.ohchr.org/en/calls-for-input/2023/call-inputs-viewissuing-joint-statement-notion-short-term-enforced. The Committee and the Working Group opened a call for submissions through 15 August 2023 to gather contributions for their upcoming joint statement on the issue, which will aim to address the details of 'short-term enforced disappearances' and the contexts in which they arise, along with relevant procedural questions under domestic and international law.

<sup>Press Release, Multiple Mechanisms, "Every Minute Counts" - UN
Experts Raise Alarm Over Short-Term Enforced Disappearances International
Day of the Victims of Enforced Disappearances - Tuesday 30 August 2016,
U.N. Press Release (Aug. 26, 2016);</sup> *See also* Rep. of the Working Group on
Enforced or Involuntary Disappearances, at 117, U.N. Doc. A/HRC/27/49
(Aug. 4, 2014).

<sup>Rep. of the Working Group on Enforced or Involuntary
Disappearances, § 26, at 11, U.N. Doc. A/HRC/7/2 (Jan. 10, 2008).
Rep. of the Working Group on Enforced or Involuntary
Disappearances, § 26, at 12, U.N. Doc. A/HRC/7/2 (Jan. 10, 2008).
Id.</sup>

¹³¹ Rome Statute of the International Criminal Court, art. 7, ¶ 1, i, July 17, 1998; G.A. Res. 47/133, International Convention for the Protection of All Persons from Enforced Disappearance, at 5 (Dec. 23, 2010).

¹³² Rome Statute of the International Criminal Court, art. 7, 2, a, July 17, 1998; International Criminal Court, Elements of a Crime, at 3, 3 (2013).

¹³³ G.A. Res. 2200A (XXI), International Covenant on Civil and Political Rights, art 9, ¶ 1 (Dec. 16, 1966).

¹³⁴ Rep. of the Working Group on Arbitrary Detention, ¶ 43, U.N. Doc A/HRC/22/44 (Dec. 24, 2012).

¹³⁵ Id. ¶ 50.

¹³⁶ G.A. Res. 2200A (XXI), International Covenant on Civil and Political Rights, art 9 (Dec. 16, 1966).

¹³⁷ U.N. International Covenant on Civil and Political Rights, General Comment 35, Article 9 (Liberty and security of person), ¶ 17, U.N. Doc. CCPR/C/GC/35 (Oct. 23, 2014).

¹³⁸ Id.

¹³⁹ Special Rapporteur on Extrajudicial, Summary or Arbitrary Executions, About the Mandate, https://www.ohchr.org/en/special-procedures/sr-executions.

the right to life, as established in Article 6 of the ICCPR, which specifically prohibits the "arbitrary deprivation" of life,140 and to which Iran is a state party. While no treaty explicitly defines extrajudicial or arbitrary executions, they are generally understood to encompass killings involving State officials, or actors connected to the State.¹⁴¹ The Special Rapporteur on extrajudicial, summary or arbitrary executions has identified at least six characteristics that are associated with the arbitrary deprivation of life: (1) having a procedural and a substantive component, (2) impermissible under international law, or under more protective domestic law provisions, (3) arbitrariness may be inferred from laws and practices which violate the principle of non-discrimination, (4) including elements of inappropriateness, injustice, and lack of predictability and due process of law, (5) deliberate intent is not a requirement, and killings in circumstances of unnecessary or disproportionate excessive use of force by police are likely to be arbitrary, and (6) the safeguards against arbitrary deprivation of life apply to killings by non-State actors.¹⁴² In addition, the Special Rapporteur on extrajudicial, summary or arbitrary executions has underscored that the bodies of the dead and their human remains deserve respect and violations of the bodies of the dead are increasingly recognized as an attack on personal dignity, which has progressively emerged in regional and international human rights instruments and jurisprudence.¹⁴³

D. Freedom from Torture

The right to be free from torture and cruel, inhuman, or degrading treatment or punishment is established in Article 7 of the ICCPR, to which Iran is a state party; acts of torture further violate Article 10, which guarantees that individuals deprived of their liberty have the right to be treated with humanity and respect for the "inherent dignity of the human person."144 The prohibition on torture is also established in Article 5 of the UDHR.145 In addition, the prohibition of torture is considered a peremptory norm of international law, and various courts have held that the prohibition of cruel, inhuman, or degrading treatment or punishment is customary international law.¹⁴⁶ Torture is defined as any act by which severe pain or suffering is intentionally inflicted by, or at the instigation of, a public official.¹⁴⁷ Torture may be carried out to obtain information from an individual or a third person, be punishment for an act the individual committed, or is suspected of committing, or to intimidate the individual or other persons.¹⁴⁸ The pain and suffering may be physical or mental, and overall constitutes an aggravated and deliberate form of cruel, inhuman, or degrading punishment.¹⁴⁹

E. The Prohibition of Gender Persecution

Persecution refers to the "intentional and severe deprivation of fundamental rights contrary to international law by reason of the identity of a group or collectivity,"¹⁵⁰ which is prohibited under customary international law. One historically neglected example is the crime against humanity of persecution on the grounds of gender, more commonly known as gender persecution.¹⁵¹ Gender-based persecution targets groups on the basis of gender and may be utilized by perpetrators to regulate or punish those who are perceived to transgress gender criteria that define "accepted" forms of gender expression.¹⁵² Gender persecution was not reflected in treaty law until the adoption of the Rome Statute of the International Criminal Court (ICC).153 While the Islamic Republic of Iran is not a party to the Rome

153 Id.

¹⁴⁰ G.A. Res. 2200A (XXI), International Covenant on Civil and Political Rights, art 6 (Dec. 16, 1966).

^{U.N. Human Rights Council, Rep. of the Special Rapporteur on} Extrajudicial, Summary or Arbitrary Executions on a Gender-Sensitive Approach to Arbitrary Killings, 9 10, U.N. Doc A/HRC/35/23 (June 6, 2017). *Id.* 9 27-35.

¹⁴³ Special Procedures, Call for Input: The Protection of Dead Persons and Their Human Remains, Including of Victims of Potentially Unlawful Killings, (Feb. 19, 2024), Multiple Mechanisms, Call for Inputs with a View to Issuing a Joint Statement on the Notion of Short-Term Enforced Disappearance, (Aug. 16, 2023), https://www.ohchr.org/en/calls-for-input/2023/call-inputs-viewissuing-joint-statement-notion-short-term-enforced.

¹⁴⁴ G.A. Res. 2200A (XXI), International Covenant on Civil and Political Rights, art 7, art 10, (Dec. 16, 1966).

¹⁴⁵ G.A. Res. 217 (III) A, Universal Declaration of Human Rights, art 5

⁽Dec. 10, 1948).

¹⁴⁶ G.A. Res. 66/150, at 1, § 3 (Mar. 27, 2012).

¹⁴⁷ G.A. Res 60/147, art 1, ¶ 1 (Dec. 9, 1975).

¹⁴⁸ Id.

¹⁴⁹ *Id.* art 1, ¶ 1, art 1, ¶ 2.

¹⁵⁰ International Criminal Court, Policy on the Crime of Gender Persecution, **9** 4 (2022).

¹⁵¹ Id.

¹⁵² Id. at 4.

Statute, this report refers to the ICC Office of the Prosecutor (OTP) Policy on the Crime of Gender Persecution as it is one of the most developed sources available for understanding the customary international law crime of gender persecution.

The OTP of the ICC issued its Policy on Gender Persecution in 2022 which acknowledges that recognition of gender persecution can shed light on victims who are vulnerable because of multiple and intersecting forms of discrimination.¹⁵⁴ Such recognition may also reflect "the continuum of historical and longstanding structural discrimination and fundamental rights deprivations experienced by vulnerable gender groups."155

Crucially, the targeted group or collectivity is viewed broadly.¹⁵⁶ Not all of the targeted persons are required to be directly part of the targeted group, or to personally carry the given attribute; it is sufficient if they are "sympathisers or affiliates of targeted members."157 The OTP policy provides the example of a perpetrator targeting a school to prevent girls from attending; in such a scenario, the men who are teachers and staff at that school may form part of the targeted group, where the grounds for targeting are based on gender.¹⁵⁸ This echoes case law from the International Criminal Tribunal for the former Yugoslavia where the Trial Chamber found that the targeted groups must include those who are "defined by the perpetrator as belonging to the victim group due to their close affiliations or sympathies for the victim group," since the perpetrator defines the victim group and the victims have no influence on their status.¹⁵⁹

F. The Right to Assembly & Association

The rights to peaceful assembly and the freedom of association are guaranteed under the UDHR¹⁶⁰ and ICCPR,¹⁶¹ and, together with other rights, constitutes the very foundation of participatory government.¹⁶² Both the right of peaceful assembly and the freedom of association can only be restricted when they are (a) enforced in conformity with the law and (b) necessary in a democratic society for the interest of national security, public safety, public order, the protection of public health or morals, or the protection of the rights and freedoms of others.¹⁶³ Crucially, "no one should be harassed or face other reprisals as a result of their presence at or affiliation with a peaceful assembly."164

Restrictions upon these rights must be necessary and proportionate, as opposed to merely being reasonable or expedient, and must relate to the abovementioned requirements.¹⁶⁵ Concerning national security as a reason to restrict these rights, where "the very reason that national security has deteriorated is the suppression of human rights, this cannot be used to justify further restrictions, including on the right of peaceful assembly."166 Isolated acts of violence within an assembly should not be attributed to others, to the organizers, or to the assembly as a whole.¹⁶⁷ In addition, assemblies that cause disruption, whether intended or not, do not forego the protections they are normally entitled to.¹⁶⁸ Lastly, States should not rely on a vague definition of "public order" to justify overbroad restrictions, and restrictions for the protection of "morals" must be understood "in the light of the universality of human rights."169

¹⁵⁴ Id. at 5.

¹⁵⁵ Id.

¹⁵⁶ Id. ¶ 43. Id.

¹⁵⁷ 158 Id.

¹⁵⁹

Prosecutor v. Naletilić and Martinović, Case No. IT-98-34-T, Judgement, ¶ 636 (Int'l Crim. Trib. for the Former Yugoslavia May 3, 2006). G.A. Res. 217 (III) A, Universal Declaration of Human Rights, art 20 160 (Dec. 10, 1948).

G.A. Res. 2200A (XXI), International Covenant on Civil and 161 Political Rights, art 21, art 22 (Dec. 16, 1966); See also U.N. Office of the High Commissioner for Human Rights, Ratification Status for Iran (Islamic Republic of), https://tbinternet.ohchr.org/_layouts/15/TreatyBodyExternal/ Treaty.aspx?CountryID=81&Lang=EN.

¹⁶² U.N. International Covenant on Civil and Political Rights, General Comment No. 37 (2020) on the right to peaceful assembly (article 21), § 1, U.N. Doc. CCPR/C/GC/37 (Sept. 17, 2020).

¹⁶³ G.A. Res. 2200A (XXI), International Covenant on Civil and Political Rights, art 21, 22 (Dec. 16, 1966).

¹⁶⁴ U.N. International Covenant on Civil and Political Rights, General Comment No. 37 (2020) on the right to peaceful assembly (article 21), ¶ 33, U.N. Doc. CCPR/C/GC/37 (Sept. 17, 2020).

¹⁶⁵ Id. ¶ 40.

Id. ¶ 42. 166

Id. ¶ 17. 167

Id. ¶ 7. 168

Id. ¶ 44-46. 169

G. The Right to Freedom of Expression

The right to freedom of expression is also guaranteed under the ICCPR, along with the right to hold opinions without interference.¹⁷⁰ The right to freedom of expression includes the "freedom to seek, receive, and impart information and ideas of all kinds, regardless of frontiers, either orally ... or through any other media of his choice."171 These rights are considered "indispensable conditions for the full development of the person" and "essential for any society."172 According to Article 19(3),173 restrictions upon these rights may only be imposed as (1) provided by law, (2) address a legitimate purpose, and (3) must conform to "strict tests of necessity and proportionality."174 For example, these rights include actions such as political discourse, commentary on public affairs, the discussion of human rights, and expressions that may be regarded as deeply offensive.¹⁷⁵ Freedom of expression is necessary for the realization of the principles of transparency and accountability; any restrictions on the exercise of this right cannot put the right itself in jeopardy.¹⁷⁶

H. The Right to Truth

The right to truth is an inalienable right that is linked to the State's duty to protect human rights, conduct effective investigations, and guarantee effective remedies and reparations.¹⁷⁷ The right to truth has been defined as "knowing the full and complete truth as to the events that transpired, their specific circumstances, and who participated in them," which includes the circumstances around, and the reasons for, the violation.¹⁷⁸ Given that the right to truth is inalienable and is closely linked with other non-derogable rights, including universal prohibitions on torture, the right to truth is also a non-derogable right and faces no exceptions.¹⁷⁹

The existence of the right to truth as an autonomous right was first acknowledged by the WGEID in 1981.180 It has also been recognized by the Human Rights Commission, the Human Rights Council, and the UN General Assembly in various capacities, including through the creation of the Special Rapporteurship on the promotion of truth, justice, reparation and guarantees of non-recurrence and various resolutions.¹⁸¹ As it relates to enforced disappearance, the ICPPED, provides that each victim "has the right to know the truth regarding the circumstances of the enforced disappearance, the progress and results of the investigation, and the fate of the disappeared person."182 In cases of missing persons, enforced disappearance, or abducted children, the right to truth also includes knowing the fate and whereabouts of the victim.¹⁸³

The right to truth, particularly as it pertains to the families of victims, has been further established in the Set of Principles for the Protection and Promotion of Human Rights Through Action to Combat Impunity, which states that victims *and* their families have the right to know the truth about the circumstances in which violations took place and, in the event of death or disappearance, the victims' fate.¹⁸⁴ The right to truth has also been cited in relation to the rights of internally displaced persons to know the fate of their relatives.¹⁸⁵

The right to truth is also acknowledged as both a collective and an individual right; each victim has the right to know the truth about the violations that directly affect himself or herself, but the

¹⁷⁰ G.A. Res. 2200A (XXI), International Covenant on Civil and Political Rights, art 9, § 1, art 19, § 2 (Dec. 16, 1966).

¹⁷¹ Id.

¹⁷² U.N. International Covenant on Civil and Political Rights, General Comment No. 34, Article 19: Freedoms of expression and opinion, ¶ 2, U.N. Doc CCPR/C/GC/34 (Sept. 12, 2011).

¹⁷³ G.A. Res. 2200A (XXI), International Covenant on Civil and Political Rights, art 19, **9** 3 (Dec. 16, 1966).

¹⁷⁴ Id. ¶ 22.

¹⁷⁵ U.N. International Covenant on Civil and Political Rights, General Comment No. 34, Article 19: Freedoms of expression and opinion, ¶ 11, U.N. Doc CCPR/C/GC/34 (Sept. 12, 2011).

¹⁷⁶ Id. ¶ 3, 21.

¹⁷⁷ U.N. Office of the High Commissioner for Human Rights, Truth, https://www.ohchr.org/en/transitional-justice/truth.

¹⁷⁸ Promotion and Protection of Human Rights, Study on the Right to Truth, Rep. of the OHCHR, at 27, U.N. Doc E/CN.4/2006/91 (Feb. 8, 2006).

¹⁷⁹ Id. ¶ 59.

¹⁸⁰ Rep. of the Working Group on Enforced or Involuntary Disappearances, at 13, U.N. Doc. A/HRC/16/48 (2011).

¹⁸¹ G.A. Res. 68/165, at 1-2 (Jan. 21, 2014).

¹⁸² G.A. Res. 47/133, International Convention for the Protection of All Persons from Enforced Disappearance, art 24, § 2 (Dec. 23, 2010).

^{Promotion and Protection of Human Rights, Study on the Right to} Truth, Rep. of the OHCHR, 9 27, U.N. Doc E/CN.4/2006/91 (Feb. 8, 2006).
UN ESCOR, Rep. of the Independent Expert to Update the Set of Principles to Combat Impunity, Diane Orentlicher, principle 4, U.N. Doc. E/ CN.4/2005/102/Add.1 (Feb. 8, 2005).

¹⁸⁵ Promotion and Protection of Human Rights, Study on the Right to Truth, Rep. of the OHCHR, ¶ 9, U.N. Doc E/CN.4/2006/91 (Feb. 8, 2006).

truth is also obligated at a societal and State level to help preserve the collective memory of their society.¹⁸⁶ The State has a related duty to preserve memory, given that a people's "knowledge of the history of its oppression is part of its heritage," and this knowledge serves as a vital safeguard against the recurrence of similar violations.¹⁸⁷

¹⁸⁶ UN ESCOR, Rep. of the Independent Expert to Update the Set of Principles to Combat Impunity, Diane Orentlicher, principles 2, 3, U.N. Doc. E/CN.4/2005/102/Add.1 (Feb. 8, 2005).

¹⁸⁷ *Id.*; Report of the Working Group on Enforced or Involuntary Disappearances, Best Practices on Enforced Disappearances in Domestic Criminal Legislation, at 13, U.N. Doc A/HRC/16/48/Add.3 (Dec. 28, 2010).

IV. Methodology

During the summer of 2023, the Atlantic Council's Strategic Litigation Project asked the Digital Investigations Lab at UCLA School of Law to begin systematically collecting open source information pertaining to violence committed against protesters of the Woman, Life, Freedom protest movement that arose in the Islamic Republic of Iran following the death in police custody of Mahsa "Jina" Amini on September 16, 2022, in consultation with the Iran Human Rights Documentation Center. That data has been forensically preserved within the independent Iranian Archive housed at Mnemonic. Other partners subsequently joined the Iran Digital Archive Coalition, including the Human Rights Center at UC Berkeley, the Azadi Archive and Amnesty International. Mnemonic launched the Iranian Archive in Spring 2024.

During the initial collection phase, the UCLA team, consisting of four student researchers, utilized various open source platforms such as Google, Twitter (now X), Instagram, Telegram, and Facebook to gather approximately 3,000 pieces of content related to the protests throughout Iran between September 2022 and May 2023. The content collected included media, user-generated content in the form of photos, videos, and text posted to various social media platforms, and human rights org and other civil society reporting. Key tools employed in this research include advanced Google Search, TweetDeck, Telegogo, Google Reverse Image Search, and Google Translate. The team developed an initial tagging schema to categorize the content, including identifying content that contained: destruction of property, violence against persons, visible security forces, blinding, poisoning, munitions, child recruits, forced statements, and government statements.

Following the initial data collection, two

researchers independently reviewed each piece of information to confirm the classification of the data and to identify trends indicating potential widespread or systematic human rights violations by the Islamic Republic. A notable trend was the disappearances or death of minors during the protest, followed by some attempts by the state to suppress information about what happened to the person.

Guided by that trend, the team analyzed the data to compile a list of underage victims, which led to an initial list of 135 individuals who had been killed, disappeared or detained during the protest movement.¹⁸⁸ The team was unable to verify the age of any of the individuals using governmentissued records due to a lack of publicly available information; consequently, they relied upon the age reported in the content, often verified by one or more other pieces of content stating the same age. Of the victims, the vast majority were 16-18, but some victims were as young as 6 years old.

Within the 135 cases, two major trends emerged: (1) there were often extensive state efforts to conceal the fate of minors by attributing their death to non-state causes; and (2) the state exerted pressure on the families and friends of victims to remain silent about the circumstances of their death.

With the initial list of 135 cases, the team worked to verify and substantiate the facts of each one. The case studies in this report were selected because, for each, there are at least three sources corroborating information related to the victims.¹⁸⁹ Cases lacking state involvement in

^{As of July 2024, the Iran Human Rights Documentation Center} has verified 472 fatalities during and in connection to the 2022 protests, including 73 children. This information is not publicly available.
U.N. Office of the High Commissioner for Human Rights, Commissions of Inquiry and Fact-Finding Mission on International Human Rights and Humanitarian Law, https://www.ohchr.org/sites/default/files/ Documents/Publications/Col_Guidance_and_Practice.pdf.

the victim's death and concealment of their fate were excluded, as were those without verification from reputable sources. Some cases with only two reputable sources were included when one source was particularly reliable, such as reporting by Amnesty International, which follows a rigorous research methodology.

This methodology ensured a meticulous and principled approach to the inclusion or exclusion of cases in the report, aligning with evidentiary standards set forth by the Commissions of Inquiry and Fact-Finding Missions on International Humanitarian Law¹⁹⁰ and emphasizing the reliability and credibility of the information presented.

All names of places, people, organizations, and others in the footnotes originally written in Persian have been transliterated using the system of the International Journal of Middle Eastern Studies (IJMES).¹⁹¹

Id.
 The IJMES translation guidelines are available at https://www.
 cambridge.org/core/journals/international-journal-of-middle-east-studies/
 information/author-resources/ijmes-translation-and-transliteration-guide.

V. Case Studies

This section presents 12 case studies of individual victims who were minors when they were killed during the first two months of the Woman, Life, Freedom protest movement, and who were subject to multiple human rights violations. Many of these cases involve historically marginalized Kurdish-majority provinces in western Iran and Sunni communities in Sistan and Baluchestan Province.

Each case study is structured to show what happened to each individual during the protests, and to their families in the aftermath of their killings. For each, the individual is identified and how and where they were attacked, detained or killed by security forces. Next, the case study describes what happened to the individual and known information on how they died. Third, the case study summarizes how the Islamic Republic exerted various forms of pressure on the family members to suppress the true information of what happened, often for months after the death of their loved ones. All of the information in this report is derived from open source; no family members were consulted or interviewed for this report.

In each of the case studies, the victim's right to freedom of assembly and association was violated¹⁹² and their freedom of expression infringed¹⁹³ when they were targeted during demonstrations or as they engaged in protest activities throughout Iran. They were all subjected to gender persecution as they were targeted on the basis of their "identity of a group or collectivity," or as "sympathisers or affiliates of targeted members."¹⁹⁴ Many were subject to arbitrary detention.¹⁹⁵ Each was killed extrajudicially by security forces, which is a violation of their right to life and liberty.¹⁹⁶ For the first 8 case studies (a-h), all three elements of enforced disappearance are proved: (1) deprivation of liberty against the will of the person; (2) involvement of government officials, at least by acquiescence; and (3) refusal to acknowledge the deprivation of liberty or concealment of the fate or whereabouts of the disappeared person.¹⁹⁷ The next 3 (i-k) case studies do not meet all the requirements of enforced disappearance, but show the consistent pattern of extrajudicial killing and information suppression carried out by the Regime in the aftermath of the deaths, violating the right to truth.¹⁹⁸

This report excludes cases where open source information about the circumstances of death and its aftermath is limited. It does not address several cases involving minors killed in economically disadvantaged areas, where their deaths received minimal attention due to socioeconomic constraints.¹⁹⁹ Additionally, cases lacking independent reporting on the families of killed minors are excluded, especially where there is evidence that families may have been pressured by the state to provide an alternative

^{G.A. Res. 217 (III) A, Universal Declaration of Human Rights, art 20 (Dec. 10, 1948); G.A. Res. 2200A (XXI), International Covenant on Civil and Political Rights, art 21, art 22 (Dec. 16, 1966).;} *See also* OHCHR, Ratification Status for Iran (Islamic Republic of), available at https://tbinternet.ohchr.org/_layouts/15/TreatyBodyExternal/Treaty.aspx?CountryID=81&Lang=EN.
G.A. Res. 2200A (XXI), International Covenant on Civil and Political

<sup>Rights, art 19, § 1, art 19, § 2 (Dec. 16, 1966).
194 International Criminal Court, Policy on the Crime of Gender Persecution, § 4 (2022).</sup>

¹⁹⁵ G.A. Res. 2200A (XXI), International Covenant on Civil and Political Rights, art 9, § 1 (Dec. 16, 1966).

¹⁹⁶ G.A. Res. 2200A (XXI), International Covenant on Civil and Political Rights, art 6 (Dec. 16, 1966).

<sup>Rep. of the Working Group on Enforced or Involuntary
Disappearances, Best Practices on Enforced Disappearances in Domestic
Criminal Legislation,</sup> *9* 21, U.N. Doc. A/HRC/16/48/Add.3 (Dec. 28, 2010). *Id.* at 21; G.A. Res. 68/165, at 1-2 (Jan. 21, 2014).

¹⁹⁹ As an example, Abdullah Mahmoudpour, 16, died after being shot with live ammunition by Basij forces in Balov village, West Azerbaijan Province on September 21, 2022. His family was then coerced into declaring that Kurdish opposition parties were responsible for his death, accepting diya [blood money from the state], and foregoing any attempt to seek justice for him. See Ravāyatī Az Qatli Hukūmatī 'bdulāh Maḥmūdpūr Dar Jaryāni Khīzish Zan, Zingigī, Āzādī Dar Urmīyīh [Story of the Governmental Murder of Abdallah Mahmoudpour During the Woman, Life, Freedom Protests in Orumiyeh], Kurdpa [June 19, 2023), https://web.archive.org/ web/20230628222746/https://kurdpa.net/fa/news/2023/06/66.

narrative about their child's fate.200

The final case study is a little different as it involves nineteen children from Sistan and Baluchestan Province. These nineteen are grouped together publicly available information because on these children is lacking, thus the case study methodology requirements outlined in this report were not met. However, they demonstrate a consistent pattern of extrajudicial killings by security forces and state pressure on family members to conceal the true circumstances of their deaths. This pressure is intensified by the region's severe security environment, longstanding religious discrimination, lack of access to basic necessities, including identification documents, and widespread poverty. These cases are included to honor and commemorate their lives

A. Zakaria Khial (زكر با خبال)²⁰¹



On September 20, 2022, four days after the death of Mahsa "Jina" Amini, 16-year-old Zakaria Khial, a member of Iran's persecuted Sunni Kurdish minority, participated in a peaceful protest on 32 Meters Street in the Kurdish-populated city of Piranshahr, in West Azerbaijan Province, northwestern Iran.²⁰² Around 9:30PM, security forces reportedly shot Zakaria with live ammunition in the back, chest, and hand from a distance of two meters.²⁰³ At least one source reports that while Zakaria lay bleeding on the ground, security forces also severely beat him, resulting in broken legs and hands.²⁰⁴

Approximately one hour later, Zakaria's father received information that his son had been killed and his body was transferred to the hospital. He rushed to the hospital, but before he could arrive, Zakaria's body was seized by security forces.²⁰⁵

Zakaria's father was subsequently arrested and taken to the office of the Iranian Police Criminal Investigation Department, also known as Police Āgāhi, in Piranshahr.²⁰⁶ During his detention, Zakaria's father was threatened in an attempt to coerce him into publicly declaring that his son had been killed by Kurdish opposition parties, rather than by the Islamic Republic's security forces, even though he was not aware of the true circumstances surrounding his son's death and whereabouts of his dead body. Despite the pressure, Zakaria's father refused to repeat the security forces' narrative.207

Two days after Zakaria's death, his parents buried him during a service conducted under strict security measures.²⁰⁸ The state officials attempted to prevent them from holding chehelom, which is a memorial ritual on the fortieth day after death,

203 Id.

Id.

²⁰⁰ As an example, Seyyed Sina Loh Mousavi, aged 16, was fatally shot by security forces in Amol, Mazandaran Province, on September 21, 2022. Subsequently, his family was coerced into asserting that political opponents were responsible for his death. Following this declaration, his family refrained from disclosing further details about his fate. See Dīdār Dastyār Ra'īs Jumhūr Bā Khānivādih Shuhadā Va Jān Bākhtigān Nā Ārāmī Hāay Sāl Guzashtih | Pīygīr Mavārid Ehtimālī Naghż Huqūq Mardum Hastīm [Meeting of the Vice President's Assistant with the Families of Martyrs and Victims of Last Year's Unrest | We Are Following up on Potential Violations of People's Rights], Hamshahrionline (Dec. 5, 2023), https://www.hamshahrionline.ir/ news/813268; See also Seyed Sina Mousavi, ausiran, available at https://www. ausiran.org/martyrs/seyed-sina-mousavi/ (last visited Jul. 10, 2024). 201 Picture courtesy of Zakaria Khial, obtained from his funeral notice published by journalist Saman Rasoulpour in X (formerly Twitter), https://x. com/SamRasoulpour/status/1572515050610634758 (last visited Aug. 1, 2024).

Iran: Killings of Children During Youthful Antiestablishment Protests, 202 Amnesty International (Dec. 9, 2022), https://www.amnesty.de/sites/ default/files/2022-12/Amnesty-Bericht-Iran-Toetung-Kinder-Jugendliche-Polizeigewalt-Dezember-2022.pdf; See also Ravāyatī Az Qatli Hukūmatī Zakarīyā Khīyāl, Az Jān Bākhtigān Khizish Enqilābī Zan, Zingigī, Āzādī [A Narrative of the Statet Murder of Zakaria Khial, One of the Victims of the Woman, Life, Freedom Movement], Kurdpa (May 6, 2023), available at https://kurdpa.net/fa/news/2023/05/18.

²⁰⁴ Iran: Killings of Children During Youthful Antiestablishment Protests, Amnesty International (Dec. 9, 2022), https://www.amnesty.de/sites/ default/files/2022-12/Amnesty-Bericht-Iran-Toetung-Kinder-Jugendliche-Polizeigewalt-Dezember-2022.pdf

Ravāyatī Az Qatli Hukūmatī Zakarīyā Khīyāl, Az Jān Bākhtigān 205 Khizish Enqilābī Zan, Zingigī, Āzādī [A Narrative of the State Murder of Zakaria Khial, One of the Victims of the Woman, Life, Freedom Movement], Kurdpa (May 6, 2023), https://kurdpa.net/fa/news/2023/05/18. Ravāyatī Az Qatli Hukūmatī Zakarīyā Khīyāl, Az Jān Bākhtigān 206 Khizish Enqilābī Zan, Zingigī, Āzādī [A Narrative of the State Murder of Zakaria Khial, One of the Victims of the Woman, Life, Freedom Movement],

Kurdpa (May 6, 2023), https://kurdpa.net/fa/news/2023/05/18.

with reports that security forces injured attendants²⁰⁹. In July 2023, a video surfaced on social media showing that Zakaria's headstone had been broken.²¹⁰ The Islamic Republic's security forces have destroyed and demolished the graves and memorials of the regime's victims in numerous documented cases.²¹¹ Zakaria's family filed a criminal complaint against the security forces implicated in his death, but they have not yet received a response from the court.²¹²

B. Nika Shakarami (نیکا شاکرمی)²¹³



On September 20, 2022, 16-year-old Nika Shakarami joined protests in Keshavarz Boulevard in the capital city Tehran.²¹⁴ Eyewitnesses, phone calls, and photographic evidence have confirmed Nika's presence at the protest on the night she disappeared.²¹⁵ Witnesses on the scene have stated

they saw her being detained by security forces.²¹⁶ Her social media accounts were deleted and removed following her disappearance.²¹⁷

Nika's mother searched for her for days, at one point being told by security forces that, "the IRGC got her, they wanted to slowly interrogate her.^{218"} Nika's aunt also reported being contacted by the IRGC, claiming that they told her Nika had been interrogated and was transferred to Evin prison in Tehran.²¹⁹ On September 29, Nika's family was informed that her body had been found in a courtyard several days earlier.²²⁰ They were permitted a brief viewing of the body, observing that her cheekbones, nose, and teeth were broken, and there had been repeated blows to her head.²²¹ Her body was then transferred to Lorestan Province, home of her extended family, but the body was abducted by security forces and buried in a remote village without her family's presence or consent.²²²

A Tehran prosecutor initially alleged that she had been killed by being thrown from a building, citing an autopsy that revealed multiple fractures in the pelvis, head, upper and lower limbs, hands, feet,

²⁰⁹ Id.

²¹⁰ ايران اينترنشنال (@IranIntl), X (Jul. 15, 2023, 9:01 PM), https://x.com/ IranIntl/status/1680382132722565122.

²¹¹ Roqayeh Rezaei, *E dām Mazār; Entiqām Hukūmat Irān Az Murdigān* [*The Execution of Graves: The Iranian State's Revenge on the Dead*], IranWire (June 10, 2023), https://iranwire.com/fa/features/117380-%D8%A7%D8%B9 %D8%AF%D8%A7%D9%85-.

²¹² Ravāyatī Az Qatli Hukūmatī Zakarīyā Khīyāl, Az Jān Bākhtigān Khizish Enqilābī Zan, Zingigī, Āzādī [A Narrative of the State Murder of Zakaria Khial, One of the Victims of the Woman, Life, Freedom Movement], Kurdpa (May 6, 2023), https://kurdpa.net/fa/news/2023/05/18.

²¹³ *Picture courtesy of Nika Shakarami*, Obtained from the Instagram page of her mother Nasrin Shakarami, https://www.instagram.com/p/ CxbDdcnt8PB/ (last visited Aug. 15, 2024).

Iran: Killings of Children During Youthful Antiestablishment Protests, 214 Amnesty International (Dec. 9, 2022), https://www.amnesty.de/sites/ default/files/2022-12/Amnesty-Bericht-Iran-Toetung-Kinder-Jugendliche-Polizeigewalt-Dezember-2022.pdf; See also Iran Human Rights Confirms State Killing of 16-Year-Old Protester Sarina Esmailzadeh, Iran International (Oct. 7, 2022), available at https://www.iranhr.net/en/articles/5514/; See also Gianluca Mezzofiore, et al., What Really Happened to Nika Shahkarami? Witnesses to Her Final Hours Cast Doubt on Iran's Story, CNN (Oct. 27, 2022), available at https://edition.cnn.com/2022/10/27/middleeast/iran-nikashahkarami-investigation-intl-cmd/index.html; See also Pas Az Dah Rūz Bīkhabarī, Khānivādih Nīkā Shākaramī Bā Pīykari Bī Jānash Dar Kahrizak Rubirū Shudand [After 10 Days of Having No News, Nika Shakrami's Family Found Her Dead Body in Kahrizak (Morgue)], BBC Persian (Sept. 30, 2022), available at https://www.bbc.com/persian/articles/c3gwqw4xk5po. 215 Id.

²¹⁶ Gianluca Mezzofiore, et al., *What Really Happened to Nika Shahkarami? Witnesses to Her Final Hours Cast Doubt on Iran's Story*, CNN (Oct. 27, 2022), https://edition.cnn.com/2022/10/27/middleeast/iran-nikashahkarami-investigation-intl-cmd/index.html.

²¹⁷ Pas Az Dah Rūz Bikhabarī, Khānivādih Nīkā Shākaramī Bā Pīykari Bī Jānash Dar Kahrizak Rubirū Shudand [After 10 Days of Having No News, Nika Shakrami's Family Found Her Dead Body in Kahrizak (Morgue)], BBC Persian (Sept. 30, 2022), https://www.bbc.com/persian/articles/ c3gwqw4xk5po.

²¹⁸ Gianluca Mezzofiore, et al., *What Really Happened to Nika Shahkarami? Witnesses to Her Final Hours Cast Doubt on Iran's Story*, CNN (Oct. 27, 2022), https://edition.cnn.com/2022/10/27/middleeast/iran-nikashahkarami-investigation-intl-cmd/index.html.

²¹⁹ Id.

²²⁰ Iran: Killings of Children During Youthful Antiestablishment Protests, Amnesty International (Dec. 9, 2022), https://www.amnesty.de/sites/ default/files/2022-12/Amnesty-Bericht-Iran-Toetung-Kinder-Jugendliche-Polizeigewalt-Dezember-2022.pdf; See also Gianluca Mezzofiore, et al., What Really Happened to Nika Shahkarami? Witnesses to Her Final Hours Cast Doubt on Iran's Story, CNN (Oct. 27, 2022), available at https://edition. cnn.com/2022/10/27/middleeast/iran-nika-shahkarami-investigation-intlcmd/index.html.

²²¹ Iran: Killings of Children During Youthful Antiestablishment Protests, Amnesty International (Dec. 9, 2022), https://www.amnesty.de/sites/ default/files/2022-12/Amnesty-Bericht-Iran-Toetung-Kinder-Jugendliche-Polizeigewalt-Dezember-2022.pdf.

²²² Bāztāb Gustadih Kushtih Va Rubūdih Shudani Pīykari Nīkā Shākaramī Dar Rasāni Hāay Ejtimā 'ī; Ebhām Dar Parvandih Qatl [Widespread Reflection of the Death and Abduction of Nika Shakrami's Body in Social Media; Ambiguity in the Murder Case], Iran International (Oct. 5, 2022), https://www.iranintl.com/202210052011.

and hips.²²³ Her death certificate indicated that she had died from multiple injuries caused by blows with a hard object.²²⁴ Despite these contradictory statements, state media reported that Nika had committed suicide,²²⁵ releasing a CCTV video claiming to show Nika entering a residential building where her body was allegedly found and claiming she had fallen from the roof of the building.²²⁶ The woman depicted in the video is dressed in black and lacks any identifying features.²²⁷ Nika's mother refuted the claim that the woman in the video is Nika.²²⁸ Moreover, the published photo of her body suggests it had been moved to the courtyard, a fact later corroborated by leaked state documents.229

Following her death, Nika's family was pressured to echo the state narrative. On October 3, 2022, security forces arrested Nika's aunt and uncle. State TV aired a video showing them confirming the state's version of events.230 After that, Nika's mother spoke out, challenging the broadcast narrative. She claimed that the state media's reports were propaganda and that Nika's aunt and

224 Id.

226 Id.

227 Bibīnīd | Guzārish Ṣidā va Sīmā Az ʿilati Margi Nīkā Shākaramī | Ezhārāt Muhim Ātashi Shākaramī [Watch | Islamic Republic of Iran Broadcasting Report on the Cause of Nika Shakarami Death | Important Statements of Atash Shakarami], HamshahriOnline (Oct. 6, 2022), https:// www.hamshahrionline.ir/news/710308.

Gianluca Mezzofiore, et al., What Really Happened to Nika 228 Shahkarami? Witnesses to Her Final Hours Cast Doubt on Iran's Story, CNN (Oct. 27, 2022), https://edition.cnn.com/2022/10/27/middleeast/iran-nika-@) ايران اينترنشنال shahkarami-investigation-intl-cmd/index.html; See also ايران اينترنشنال IranIntl), X (Oct. 6, 2022, 1:15 PM), available at https://x.com/IranIntl/ status/1578071397649326082; See also Mādari Nīkā Shākaramī: Dukhtarī Ki Dar Vīdiū Şidā va Simā Nishān Dādand "Nīkā Nīst" [Nika Shakrami's Mother: the Girl Who Was Showed in the State TV's Video "Is not Nika"], BBC Persian (Oct. 10, 2022), available at https://www.bbc.com/persian/articles/ cpwzvdx999xo.

Bertram Hill, et al.,, Secret document says Iran security forces 229 molested and killed teen protester, BBC (Apr. 29, 2024), https://www.bbc. com/news/world-middle-east-68840881.

Iran: Killings of Children During Youthful Antiestablishment Protests, 230 Amnesty International (Dec. 9, 2022), https://www.amnesty.de/sites/ default/files/2022-12/Amnesty-Bericht-Iran-Toetung-Kinder-Jugendliche-Polizeigewalt-Dezember-2022.pdf; See also Iran Human Rights Confirms State Killing of 16-Year-Old Protester Sarina Esmailzadeh, Iran Human Rights (Oct. 7, 2022), available at https://www.iranhr.net/en/articles/5514/; See also Gianluca Mezzofiore, et al., What Really Happened to Nika Shahkarami? Witnesses to Her Final Hours Cast Doubt on Iran's Story, CNN (Oct. 27, 2022), available at https://edition.cnn.com/2022/10/27/middleeast/iran-nikashahkarami-investigation-intl-cmd/index.html.

uncle had been coerced into making statements. Additionally, she declared that she had been threatened to comply with the state's false narratives.²³¹ Following that, Nika's aunt announced that both her interview and her brother's interview had been obtained under coercion.²³² In April 2024, leaked state documents revealed that Nika Shakarami had been apprehended, sexually assaulted, and fatally beaten by a group of IRGC forces on the night of her disappearance.²³³ They later "dumped" her lifeless body in a quiet street under Tehran's Yadegar-e-Emam highway.234

امیر مهدی) C. Amir Mehdi Farrokhipour

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On September 28, 2022, 17-year-old Amir Mehdi Farrokhipour participated in protests near

Gianluca Mezzofiore, et al., What Really Happened to Nika 223 Shahkarami? Witnesses to Her Final Hours Cast Doubt on Iran's Story, CNN (Oct. 27, 2022), https://edition.cnn.com/2022/10/27/middleeast/iran-nikashahkarami-investigation-intl-cmd/index.html.

²²⁵ Id.

Iran: Killings of Children During Youthful Antiestablishment Protests, 231 Amnesty International (Dec. 9, 2022), https://www.amnesty.de/sites/ default/files/2022-12/Amnesty-Bericht-Iran-Toetung-Kinder-Jugendliche-Polizeigewalt-Dezember-2022.pdf; See also Parham Ghobadi, Nika Shakarami: Iran protester's family forced to lie about death, BBC (Oct. 6, 2022), available at https://www.bbc.com/news/world-middle-east-63154994; See also Mādari Nīkā Shākaramī: Dukhtaram Rā Kushtand Va Marā Barāy E 'tirāf Ejbārī Tahdīd Mikunand [Nika Shakarami's Mother: They Killed My Daughter and They Are Threatening Me to Force a Confession], Radio Farda (Oct. 6, 2022), available at https://www.radiofarda.com/a/32068260.html [depicting Nasrin Shakarami, mother of Nika, speaking about the situation surrounding her daughter's death, as well as the threats and intimidation she and her family have faced].

Parham Ghobadi, Nika Shakarami: Iran protester's family forced to lie 232 about death, BBC (Oct. 6, 2022), https://www.bbc.com/news/world-middleeast-63154994.

Bertram Hill, et al., Secret document says Iran security forces molested 233 and killed teen protester, BBC (Apr. 29, 2024), https://www.bbc.com/news/ world-middle-east-68840881. Id.

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²³⁵ Picture courtesy of Amir Mehdi Farrokhipour, Obtained from the Instagram page of his mother, https://www.instagram.com/p/CopLBoStgVc/ (last visited Aug. 15, 2024).

Keshavarz Boulevard in Tehran.²³⁶ That day, he had sent multiple text messages indicating his presence at the protests.²³⁷ Amir was fatally shot in the chest by security forces while at the protests.²³⁸

The state, however, claimed that Amir died in a motorcycle accident.²³⁹ When his family arrived at the hospital to retrieve the body, a nurse informed them that Amirhad been killed by live ammunition.²⁴⁰ The family observed that Amir's stomach had been stitched.²⁴¹ They also saw baton marks on his back and neck, indicating that he had been severely beaten.242

Security forces were present at the hospital and reportedly pressured Amir's father to record a video declaring that Amir died in a motorcycle accident, leveraging threats against his daughters.²⁴³ Amir's death certificate attributes his demise to a

237 Farin Assemi, Jān Bākhtigān Eʿtirāż Hāay Irān; Āmīr Mihdī Farukhī Pūr: Nimīkhāham Balāyī Ki Sari Mahsā Āmad, Sari Dukhtarān Dīgar Biyāyad [The Victims of Iran's Protests; Amir Mahdi Farokhipour: I Don't Want the Same Thing that Happened to Mahsa to Happen to Other Girls], BBC Persian (Sept. 27, 2023), https://www.bbc.com/persian/articles/cxe3y2xdym2o. Iran: Killings of Children During Youthful Antiestablishment Protests, 238 Amnesty International (Dec. 9, 2022), https://www.amnesty.de/sites/

default/files/2022-12/Amnesty-Bericht-Iran-Toetung-Kinder-Jugendliche-Polizeigewalt-Dezember-2022.pdf; See also Farin Assemi, Jān Bākhtigān E'tirāż Hāay Irān; Āmīr Mihdī Farukhī Pūr: Nimīkhāham Balāyī Ki Sari Mahsā Āmad, Sari Dukhtarān Dīgar Biyāyad [The Victims of Iran's Protests; Amir Mahdi Farokhipour: I Don't Want the Same Thing that Happened to Mahsa to Happen to Other Girls], BBC Persian (Sept. 27, 2023), available at https://www.bbc.com/persian/articles/cxe3y2xdym2o Id.

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242 Id.

243 Iran: Killings of Children During Youthful Antiestablishment Protests, Amnesty International (Dec. 9, 2022), https://www.amnesty.de/sites/ default/files/2022-12/Amnesty-Bericht-Iran-Toetung-Kinder-Jugendliche-Polizeigewalt-Dezember-2022.pdf; See also Farin Assemi, Jān Bākhtigān E'tirāż Hāay Irān; Āmīr Mihdī Farukhī Pūr: Nimīkhāham Balāyī Ki Sari Mahsā Āmad, Sari Dukhtarān Dīgar Biyāyad [The Victims of Iran's Protests; Amir Mahdi Farokhipour: I Don't Want the Same Thing that Happened to Mahsa to Happen to Other Girls], BBC Persian (Sept. 27, 2023), available at https://www.bbc.com/persian/articles/cxe3y2xdym2o.

collision with a hard or sharp object (bullet).244

D. Sarina Esmailzadeh (سارينا اسماعيلزاده)²⁴⁵



On September 23, 2022, 16-year-old Sarina Esmailzadeh left class to join protests near her school in Karaj, Alborz Province.246 During the protests, she was fatally struck on the head with a baton by security force.²⁴⁷ Sarina's family received a call instructing them to collect her body and conduct her burial that night, all under strict security measures.²⁴⁸ Security forces permitted the family to only view Sarina's face for identification, revealing signs of severe trauma.²⁴⁹

Following Sarina's death, the Islamic Republic consistently asserted the narrative that she died by suicide, claiming that she threw herself from a

244 Farin Assemi, Jān Bākhtigān Eʿtirāż Hāay Irān; Āmīr Mihdī Farukhī Pūr: Nimīkhāham Balāyī Ki Sari Mahsā Āmad, Sari Dukhtarān Dīgar Biyāyad [The Victims of Iran's Protests; Amir Mahdi Farokhipour: I Don't Want the Same Thing that Happened to Mahsa to Happen to Other Girls], BBC Persian (Sept. 27, 2023), https://www.bbc.com/persian/articles/ cxe3y2xdym2o.

245 Picture courtesy of Sarina Esmailzadeh, Obtained from Radio Farda, https://www.radiofarda.com/a/iran-protets-victemssarinaesmaielzade/32078102.html (last visited Aug. 15, 2024). Iran Human Rights Confirms State Killing of 16-Year-Old Protester 246 Sarina Esmailzadeh, Iran Human Rights (Oct. 7, 2022), https://www.iranhr. net/en/articles/5514/.

247 Iran: Killings of Children During Youthful Antiestablishment Protests, Amnesty International (Dec. 9, 2022), https://www.amnesty.de/sites/ default/files/2022-12/Amnesty-Bericht-Iran-Toetung-Kinder-Jugendliche-Polizeigewalt-Dezember-2022.pdf; See also Iran Human Rights Confirms State Killing of 16-Year-Old Protester Sarina Esmailzadeh, Iran Human Rights (Oct. 7, 2022), available at https://www.iranhr.net/en/articles/5514/. 248 Iran: Killings of Children During Youthful Antiestablishment Protests, Amnesty International (Dec. 9, 2022), https://www.amnesty.de/sites/ default/files/2022-12/Amnesty-Bericht-Iran-Toetung-Kinder-Jugendliche-

Polizeigewalt-Dezember-2022.pdf; See also Iran Human Rights Confirms State Killing of 16-Year-Old Protester Sarina Esmailzadeh, Iran Human Rights (Oct. 7, 2022), available at https://www.iranhr.net/en/articles/5514/; See also Maryam Sinaiee, Authorities Try to Cover Up Another Teen Protester's Death In Iran, Iran International (Oct. 7, 2022), available at https://www.iranintl. com/en/202210074997.

Iran Human Rights Confirms State Killing of 16-Year-Old Protester 249 Sarina Esmailzadeh, Iran Human Rights (Oct. 7, 2022), https://www.iranhr. net/en/articles/5514/; See also Farzad Seifikaran, Sārīnā Esmā 'īlzādih; Dukhtarī Ki Dar Tārīkī Mīkhandīd Va Dar Rūshanāeī Giryih Mīkard [Sarina Esmailzadeh; The Girl Who Laughed in the Darkness and Cried in the Light], Radio Zamaneh (Nov. 1, 2022), available at https://www.radiozamaneh. com/734654/.

Iran: Killings of Children During Youthful Antiestablishment Protests, 236 Amnesty International (Dec. 9, 2022), https://www.amnesty.de/sites/ default/files/2022-12/Amnesty-Bericht-Iran-Toetung-Kinder-Jugendliche-Polizeigewalt-Dezember-2022.pdf; See also Violence Against Children in Iran Protests Must Be Investigated, Save the Children Says Kayhan Life, Keyhan Life (Nov. 10, 2022), available at https://kayhanlife.com/society/human-rights/ violence-against-children-in-iran-protests-must-be-investigated-save-thechildren-says/; See also Farin Assemi, Jān Bākhtigān Eʿtirāż Hāay Irān; Āmīr Mihdī Farukhī Pūr: Nimīkhāham Balāyī Ki Sari Mahsā Āmad, Sari Dukhtarān Dīgar Biyāyad [The Victims of Iran's Protests; Amir Mahdi Farokhipour: I Don't Want the Same Thing that Happened to Mahsa to Happen to Other Girls], BBC Persian (Sept. 27, 2023), available at https://www.bbc.com/persian/articles/ cxe3y2xdym2o.

²⁴⁰ Farin Assemi, Jān Bākhtigān Eʿtirāż Hāay Irān; Āmīr Mihdī Farukhī Pūr: Nimīkhāham Balāvī Ki Sari Mahsā Āmad, Sari Dukhtarān Dīgar Bivāvad [The Victims of Iran's Protests; Amir Mahdi Farokhipour: I Don't Want the Same Thing that Happened to Mahsa to Happen to Other Girls], BBC Persian (Sept. 27, 2023), https://www.bbc.com/persian/articles/cxe3y2xdym2o. Id.

four-story building.²⁵⁰ Security forces harassed Sarina's family to prevent them from divulging the true details of her death and to echo the state's narrative.²⁵¹ Despite sources indicating the family resisted endorsing the false narrative, state media released two videos purporting to show Sarina's mother confirming the state's version of events and stating that Sarina had a history of suicide attempts.²⁵² Reports suggest that Sarina's mother was under intense pressure to reiterate the state narrative, including threats to the life of Sarina's brother.²⁵³

Sarina had popular YouTube and Telegram channels where she published poetry, music, and her own writings.²⁵⁴ Shortly after her death, security forces took control of her social media accounts.²⁵⁵ They altered her writings on her Telegram channel to portray her as a depressed teenager fantasizing about suicide.²⁵⁶

251 Id.

E. Koumar (Komar) Daroftadeh (کومار درافتاده)²⁵⁷



On October 30, 2022, 16-year-old Koumar Daroftadeh was fatally shot by security forces around Mohammad Oraz Square in Piranshahr, West Azarbaijan Province.²⁵⁸ No protests were taking place in Piranshahr that night.²⁵⁹ Witnesses at the scene reported that occupants of two Samand cars, one green and one white, both without license plates, fired at Koumar.²⁶⁰ According to Hassan Daroftadeh, Koumar's father, Koumar was targeted at very close range while standing on the corner of the street.²⁶¹ Other sources also confirmed that he was shot at

²⁵⁰ Iran Human Rights Confirms State Killing of 16-Year-Old Protester Sarina Esmailzadeh, Iran International (Oct. 7, 2022), https://www.iranhr. net/en/articles/5514/; See also Maryam Sinaiee, Authorities Try to Cover Up Another Teen Protester's Death In Iran, Iran International (Oct. 7, 2022), available at https://www.iranintl.com/en/202210074997; See also Farzad Seifikaran, Sārīnā Esmā 'īlzādih; Dukhtarī Ki Dar Tārīkī Mīkhandīd Va Dar Rūshanāeī Giryih Mīkard [Sarina Esmailzadeh; The Girl Who Laughed in the Darkness and Cried in the Light], Radio Zamaneh (Nov. 1, 2022), available at https://www.radiozamaneh.com/734654/.

²⁵² Iran: Killings of Children During Youthful Antiestablishment Protests, Amnesty International (Dec. 9, 2022), https://www.amnesty.de/sites/ default/files/2022-12/Amnesty-Bericht-Iran-Toetung-Kinder-Jugendliche-Polizeigewalt-Dezember-2022.pdf; See also Iran Human Rights Confirms State Killing of 16-Year-Old Protester Sarina Esmailzadeh, Iran Human Rights (Oct. 7, 2022), available at https://www.iranhr.net/en/articles/5514/; See also Maryam Sinaiee, Authorities Try to Cover Up Another Teen Protester's Death In Iran, Iran International (Oct. 7, 2022), available at https://www.iranintl. com/en/202210074997; See also Farzad Seifikaran, Sārīnā Esmā 'īlzādih; Dukhtarī Ki Dar Tārīkī Mīkhandīd Va Dar Rūshanāeī Giryih Mīkard [Sarina Esmailzadeh; The Girl Who Laughed in the Darkness and Cried in the Light], Radio Zamaneh (Nov. 1, 2022), available at https://www.radiozamaneh. com/734654/.

²⁵³ Iran: Killings of Children During Youthful Antiestablishment Protests, Amnesty International (Dec. 9, 2022), https://www.amnesty.de/sites/ default/files/2022-12/Amnesty-Bericht-Iran-Toetung-Kinder-Jugendliche-Polizeigewalt-Dezember-2022.pdf; See also Fereshteh Ghazi, Sārīnā Esmā 'īlzādih Ki Būd? [How Was Sarina Esmailzadeh?], Radio Farda (Oct. 13, 2022), available at https://www.radiofarda.com/a/iran-protets-victemssarinaesmaielzade/32078102.html.

²⁵⁴ Farzad Seifikaran, Sārīnā Esmā 'ilzādih; Dukhtarī Ki Dar Tārīkī Mīkhandīd Va Dar Rūshanāeī Giryih Mīkard [Sarina Esmailzadeh; The Girl Who Laughed in the Darkness and Cried in the Light], Radio Zamaneh (Nov. 1, 2022), available at https://www.radiozamaneh.com/734654/.

²⁵⁵ Id.

²⁵⁷ *Picture courtesy of Koumar Daroftadeh*, obtained from the Instagram page of his father Hasan Daroftadeh, https://www.instagram.com/p/C6XAQnXSvIF/ (last visited Jul. 31, 2024).

²⁵⁸ Iran: Killings of Children During Youthful Antiestablishment Protests, Amnesty International (Dec. 9, 2022), https://www.amnesty.de/sites/ default/files/2022-12/Amnesty-Bericht-Iran-Toetung-Kinder-Jugendliche-Polizeigewalt-Dezember-2022.pdf; See also Farzad Seifikaran, Pidari Kūmār Dar Oftādih: Kasī Ki Farzandam Rā Kusht Chigūnih Mītavānad Bi Farzandash Nigāh Kunad? [Father of Koumar Daroftadeh: How the Person Who Killed My Son Can Look at His Child?], Radio Zamaneh (Nov. 12, 2022), available at https://www.radiozamaneh.com/740740/; See also Father Says Iranian Officials Pressured Him To Blame Kurdish Groups For Son's Death, Radio Free Europe Radio Liberty (Nov. 15, 2022), available at https:// www.rferl.org/a/iran-draoftadeh-father-son-death-pressure-blame-kurdishgroups/32132148.html.

²⁵⁹ Farzad Seifikaran, Pidari Kūmār Dar Oftādih: Kasī Ki Farzandam Rā Kusht Chigūnih Mītavānad Bi Farzandash Nigāh Kunad? [Father of Koumar Daroftadeh: How the Person Who Killed My Son Can Look at His Child?], Radio Zamaneh (Nov. 12, 2022), https://www.radiozamaneh.com/740740/. 260 Kūmār Daruftādih Az Fāşlilh Si Mitrī Hadaf Tīrandāzī Qarār Giriftih Ast [Koumar Daroftadeh Was Shot at From a Distance of Three Meters], Hengaw (Oct. 31, 2022), https://hengaw.net/fa/news/archive/56956. Farzad Seifikaran, Pidari Kūmār Dar Oftādih: Kasī Ki Farzandam Rā 261 Kusht Chigūnih Mītavānad Bi Farzandash Nigāh Kunad? [Father of Koumar Daroftadeh: How the Person Who Killed My Son Can Look at His Child?], Radio Zamaneh (Nov. 12, 2022), https://www.radiozamaneh.com/740740/; See also Ārizū Hāay Buzurg Khuftih Dar Khāk; Dasti Kam 60 Bachih Bi Dasti 'avamil Jumhūrī Eslāmī Kushti Shudandand [Big Dreams Sleeping in the Soil: At Least 60 Children Have Been Killed by the Forces of the Islamic Republic], Iran International (Nov. 24, 2022), available at https://www.iranintl. com/202211247147.

close range by security forces.262

In May 2024, several leaked documents revealed that after being shot and severely wounded, Koumar was taken by security forces to the Police Āgāhi's office in Piranshahr while he was still alive.²⁶³ About two hours later, the Police Āgāhi personnel called an ambulance to attend to Koumar.²⁶⁴ Despite security forces initially preventing the paramedics from assisting him, Koumar was eventually taken to Imam Khomeini Hospital in Piranshahr, but by that time, he had no vital signs.²⁶⁵

In Koumar's death certificate, the cause of death is listed as "operation of combat equipment outside of combat and internal bleeding due to being hit by multiple high-speed projectiles."²⁶⁶ In the published images of his body, however, marks of metal pellets are visible on his right side and legs.²⁶⁷

On the evening of October 30, 2022, Koumar's family was contacted to retrieve his body from the hospital.²⁶⁸ According to a source close to the family, security forces denied any involvement in Koumar's death and pressured the family to declare that Kurdish opposition parties were

responsible.²⁶⁹ When the family refused to endorse the false narrative, security forces pressured them to bury Koumar that same night.²⁷⁰ Eventually, after much insistence, security forces relented, allowing the family to bury his body the next morning. However, they imposed a condition that he be buried in Zabaka, a village outside Piranshahr.²⁷¹

Since Koumar's death, his father has continued to attribute his son's extrajudicial killing to the actions of security forces.²⁷² Hassan Daroftadeh was repeatedly summoned by security forces and reportedly placed under pressure to publicly absolve them of responsibility and attribute Koumar's death to Kurdish opposition parties.²⁷³ Koumar's brother, Mardin Daroftadeh, was also

²⁶² Iran: Killings of Children During Youthful Antiestablishment Protests, Amnesty International (Dec. 9, 2022), https://www.amnesty.de/sites/ default/files/2022-12/Amnesty-Bericht-Iran-Toetung-Kinder-Jugendliche-Polizeigewalt-Dezember-2022.pdf; See also Father Says Iranian Officials Pressured Him To Blame Kurdish Groups For Son's Death, Radio Free Europe Radio Liberty (Nov. 15, 2022), available at https://www.rferl.org/a/irandraoftadeh-father-son-death-pressure-blame-kurdish-groups/32132148.html; See also Baran Abbasi, Koumar Daroftadeh; Chigūnih Az Talash Pizishkān Barāy Nijāt Jān Nūjavān 16 Sālih Julūgirī Shud? [Koumar Daroftadeh; How Were the Doctors' Efforts to Save the Life of the 16-Year-Old Teenager Prevented?], BBC Persian (May 13, 2024), available at https://www.bbc.com/ persian/articles/cljddn4r5p80.

²⁶³ Baran Abbasi, Koumar Daroftadeh; Chigūnih Az Talash Pizishkān Barāy Nijāt Jān Nūjavān 16 Sālih Julūgirī Shud? [Koumar Daroftadeh; How Were the Doctors' Efforts to Save the Life of the 16-Year-Old Teenager Prevented?], BBC Persian (May 13, 2024), https://www.bbc.com/persian/ articles/cljddn4r5p80.

²⁶⁴ Id.

²⁶⁵ Id.

²⁶⁶ Baran Abbasi, Koumar Daroftadeh; Chigūnih Az Talash Pizishkān Barāy Nijāt Jān Nūjavān 16 Sālih Julūgirī Shud? [Koumar Daroftadeh; How Were the Doctors' Efforts to Save the Life of the 16-Year-Old Teenager Prevented?], BBC Persian (May 13, 2024), https://www.bbc.com/persian/ articles/cljddn4r5p80.

²⁶⁷ Id.

²⁶⁸ Iran: Killings of Children During Youthful Antiestablishment Protests, Amnesty International (Dec. 9, 2022), https://www.amnesty.de/sites/ default/files/2022-12/Amnesty-Bericht-Iran-Toetung-Kinder-Jugendliche-Polizeigewalt-Dezember-2022.pdf; See also Farzad Seifikaran, Pidari Kūmār Dar Oftādih: Kasī Ki Farzandam Rā Kusht Chigūnih Mītavānad Bi Farzandash Nigāh Kunad? [Father of Koumar Daroftadeh: How the Person Who Killed My Son Can Look at His Child?], Radio Zamaneh (Nov. 12, 2022), available at https://www.radiozamaneh.com/740740/.

²⁶⁹ Baran Abbasi, Koumar Daroftadeh; Chigūnih Az Talash Pizishkān Barāy Nijāt Jān Nūjavān 16 Sālih Julūgirī Shud? [Koumar Daroftadeh; How Were the Doctors' Efforts to Save the Life of the 16-Year-Old Teenager Prevented?], BBC Persian (May 13, 2024), https://www.bbc.com/persian/ articles/cljddn4r5p80.

²⁷⁰ Id.

²⁷¹ Id. See also Iran: Killings of Children During Youthful Antiestablishment Protests, Amnesty International (Dec. 9, 2022), available at https://www.amnesty.de/sites/default/files/2022-12/Amnesty-Bericht-Iran-Toetung-Kinder-Jugendliche-Polizeigewalt-Dezember-2022.pdf; See also Farzad Seifikaran, Pidari Kūmār Dar Oftādih: Kasī Ki Farzandam Rā Kusht Chigūnih Mītavānad Bi Farzandash Nigāh Kunad? [Father of Koumar Daroftadeh: How the Person Who Killed My Son Can Look at His Child?], Radio Zamaneh (Nov. 12, 2022), available at https://www.radiozamaneh. com/740740/.

²⁷² Iran: Killings of Children During Youthful Antiestablishment Protests, Amnesty International (Dec. 9, 2022), https://www.amnesty.de/sites/ default/files/2022-12/Amnesty-Bericht-Iran-Toetung-Kinder-Jugendliche-Polizeigewalt-Dezember-2022.pdf; *See also* Farzad Seifikaran, Pidari Kūmār Dar Oftādih: Kasī Ki Farzandam Rā Kusht Chigūnih Mītavānad Bi Farzandash Nigāh Kunad? [Father of Koumar Daroftadeh: How the Person Who Killed My Son Can Look at His Child?], Radio Zamaneh (Nov. 12, 2022), available at https://www.radiozamaneh.com/740740/; *See also* Father Says Iranian Officials Pressured Him To Blame Kurdish Groups For Son's Death, Radio Free Europe Radio Liberty (Nov. 15, 2022), available at https:// www.rferl.org/a/iran-draoftadeh-father-son-death-pressure-blame-kurdishgroups/32132148.html.

Iran: Killings of Children During Youthful Antiestablishment Protests, 273 Amnesty International (Dec. 9, 2022), https://www.amnesty.de/sites/ default/files/2022-12/Amnesty-Bericht-Iran-Toetung-Kinder-Jugendliche-Polizeigewalt-Dezember-2022.pdf; See also Farzad Seifikaran, Pidari Kūmār Dar Oftādih: Kasī Ki Farzandam Rā Kusht Chigūnih Mītavānad Bi Farzandash Nigāh Kunad? [Father of Koumar Daroftadeh: How the Person Who Killed My Son Can Look at His Child?], Radio Zamaneh (Nov. 12, 2022), available at https://www.radiozamaneh.com/740740/; See also Father Says Iranian Officials Pressured Him To Blame Kurdish Groups For Son's Death, Radio Free Europe Radio Liberty (Nov. 15, 2022), available at https://www.rferl.org/a/iran-draoftadeh-father-son-death-pressure-blamekurdish-groups/32132148.html; See also Family Says Iranian Student Killed By Police Bullet, Rejecting Official Claim That She Died In A Fall, Radio Free Europe Radio Liberty (Nov. 18, 2022), available at https://www.ecoi.net/ en/document/2082256.html; See also Fereshteh Ghazi, Michael Scollon, Iranian Authorities Ratchet Up Pressure Against Slain Demonstrators' Families Ahead Of Protest Anniversary, Radio Free Europe Radio Liberty (Aug. 16, 2023), available at https://www.rferl.org/a/iran-pressure-slain-protestersanniversary-amini/32551229.html.

summoned and threatened by security forces on at least one occasion.²⁷⁴ Koumar's family has been prohibited from holding commemorative ceremonies and pressured to not post about his death on social media.²⁷⁵ On August 16, 2023, Koumar's family was apprehended while en route to his graveside to commemorate his birthday. Security forces compelled them to take off their Kurdish attire. After this confrontation, Koumar's mother suffered a heart attack and was hospitalized. His father was released after enduring hours of

interrogation.276

F. Abolfazl Adinezadeh (ابوالفضل آدينهزاده)²⁷⁷



On October 8, 2022, 17-year-old Abolfazl Adinezadeh was fatally shot at close range by dozens of metal pellets fired by security forces during a protest in front of Ferdowsi University of Mashhad, in Razavi Khorasan Province, northeastern Iran.²⁷⁸ A medical student who witnessed Abolfazl being severely wounded took him to a nearby hospital, but the hospital refused to accept him.²⁷⁹ He was then rushed to another medical center, where he later succumbed to the severity of his injuries.²⁸⁰ His burial certificate listed that he was "hit by metal pellets (hunting birdshot)" and that he died due to kidney and liver damage and trauma caused by bleeding.²⁸¹

Abolfazl's family had no information about his fate or whereabouts until an official from the Ministry of Education contacted them on October 9th, instructing them to go to a police station.²⁸² At the station, they were pressured not to speak publicly about Abolfazl's extrajudicial killing, particularly to the media, and were warned, "You zip your mouth and do not talk to media.²⁸³ His

279 Ravāyati vakīl Khānivādih Ādīnih Zādih Az Ebhāmāt Parvandih Qatli Abūlfażl; E 'tirāż Mīkunīm [Adinezadeh's Family Lawyer's Account of the Ambiguities of the Abolfazl Murder Case; We Appeal], IranWire (Nov. 8, 2023), https://iranwire.com/fa/features/122297-%D8%B1%D9%88%D8%A7 %DB%8C%D8%AA-; See also Fishār Nahād Hāay Āmnīyatī Az Țarīq Şāḥib Khānih; Bar Khānivādih Abūlfażl Chi Mīguzarad? [The Pressure of Security Agencies Through the Landlord: What is Happening to Abolfazl Adinezadeh's Family?], IranWire (Mar. 12, 2023) available at https://iranwire.com/fa/ features/114684-%D9%81%D8%B4%D8%A7%D8%B1-.

280 Fishār Nahād Hāay Āmnīyatī Az Ṭarīq Ṣāḥib Khānih; Bar Khānivādih Abūlfazl Chi Mīguzarad? [The Pressure of Security Agencies Through the Landlord: What is Happening to Abolfazl Adinezadeh's Family?], IranWire (Mar. 12, 2023) https://iranwire.com/fa/features/114684-%D9%81%D8%B4%D8%A7%D8%B1-; See also مرضيه آدينه زاده (@ MarzieAdinezade), X (Dec. 18, 2022, 11:26 AM), https://x.com/ MarzieAdinezade/status/1604513510662328324

281 Iran: Killings of Children During Youthful Antiestablishment Protests, Amnesty International (Dec. 9, 2022), https://www.amnesty. de/sites/default/files/2022-12/Amnesty-Bericht-Iran-Toetung-Kinder-Jugendliche-Polizeigewalt-Dezember-2022.pdf; See also Parham Ghobadi (@ BBCParham), X (Oct. 20, 2022, 4:23 AM), available at https://twitter.com/ BBCParham/status/1583011130041323521.

^{274 8} Åbān 1402; Sālgard Qatli Hukūmatī Kūmār Daroftādih, Nūjavān 16 Sālih, Az Jān Bākhtīgān Khīzish Zhan, Zhīān, 'āzādī Dar Pīrānshahr [October 30, 2022; The Anniversary of the State Murder of Koumar Daroftadeh, a 16-year-old Teenager, One of the Victims of the Revolutionary Uprising of Woman, Life, and Freedom in Piranshahr], Kurdpa (Oct. 30, 2023), https:// kurdpa.net/fa/news/2023/10/109.

²⁷⁵ Fereshteh Ghazi, Michael Scollon, Iranian Authorities Ratchet Up Pressure Against Slain Demonstrators' Families Ahead Of Protest Anniversary, Radio Free Europe Radio Liberty (Aug. 16, 2023), https://www.rferl.org/a/ iran-pressure-slain-protesters-anniversary-amini/32551229.html; See also 8 Åbān 1402; Sālgard Qatli Hukūmatī Kūmār Daroftādih, Nūjavān 16 Sālih, Az Jān Bākhtīgān Khīzish Zhan, Zhīān, 'āzādī Dar Pīrānshahr [October 30, 2022; The Anniversary of the state Murder of Koumar Daroftadeh, a 16-year-old Teenager, One of the Victims of the Revolutionary Uprising of Woman, Life, and Freedom in Piranshahr], Kurdpa (Oct. 30, 2023), available at https://kurdpa. net/fa/news/2023/10/109.

²⁷⁶ Yik Sālīgī Khīzīsh Va Fishār Bar Khānivādih Hāay Kusti Shudigān; Harās Dā 'imī Ḥukūmat Az Dādkhāhī [One-Year Anniversary of the Protests and Pressure on the Families of Those Killed; The State's Constant Fear of Seeking Justice], Iran International (Sept. 17, 2023), https://www.iranintl. com/202309171181.

²⁷⁷ *Picture courtesy of Abolfazl Adinezadeh*, Obtained from the Instagram page of his father Ali Adinezadeh, https://www.instagram.com/p/CltlLJXN-Ml/ (last visited June 6, 2024).

²⁷⁸ Iran: Killings of Children During Youthful Antiestablishment Protests, Amnesty International (Dec. 9, 2022), https://www.amnesty.de/sites/ default/files/2022-12/Amnesty-Bericht-Iran-Toetung-Kinder-Jugendliche-Polizeigewalt-Dezember-2022.pdf; See also Ravāyati vakīl Khānivādih Ādīnih Zādih Az Ebhāmāt Parvandih Qatli Abūlfażl; E 'tirāż Mīkunīm [Adinezadeh's Family Lawyer's Account of the Ambiguities of the Abolfazl Murder Case; We Appeal], IranWire (Nov. 8, 2023), available at https:// iranwire.com/fa/features/122297-%D8%B1%D9%88%D8%A7%DB%8C% D8%AA-.

²⁸² Iran: Killings of Children During Youthful Antiestablishment Protests, Amnesty International (Dec. 9, 2022), https://www.amnesty.de/sites/ default/files/2022-12/Amnesty-Bericht-Iran-Toetung-Kinder-Jugendliche-Polizeigewalt-Dezember-2022.pdf; See also Parham Ghobadi, Abolfazl Adinezadeh: Teenage protester shot dead by security forces - sources, BBC (Oct. 20, 2022), available at https://www.bbc.com/news/world-middleeast-63328086.

²⁸³ Iran: Killings of Children During Youthful Antiestablishment Protests, Amnesty International (Dec. 9, 2022), https://www.amnesty.de/sites/ default/files/2022-12/Amnesty-Bericht-Iran-Toetung-Kinder-Jugendliche-Polizeigewalt-Dezember-2022.pdf; *See also* Parham Ghobadi, *Abolfazl Adinezadeh: Teenage protester shot dead by security forces - sources*, BBC (Oct. 20, 2022), available at https://www.bbc.com/news/world-middleeast-63328086.

family was also pressured into declaring that Abolfazl was a member of the IRGC-controlled Basij militia and that he had been killed by protesters, a condition they had to agree to in order to retrieve his body.²⁸⁴ Abolfazl's funeral took place in Najafabad of Faruj, a village miles away from Mashhad, under the surveillance of security forces.²⁸⁵ During the funeral, mourners were harassed by plain-clothes security forces, and some were forced to delete the videos they had recorded of the ceremony.²⁸⁶

In the subsequent months, Abolfazl's family faced repeated questioning, restrictions, and harassment by security forces.²⁸⁷ On May 29, 2023, Ali and Marzieh Adinezadeh, Abolfazl's father and sister, reported that they had been charged with "disseminating propaganda against the Islamic Republic," an offense punishable by imprisonment.²⁸⁸ On June 7, 2023, Abolfazl's mother, Goldasteh Hosseini, disclosed that his grave had been vandalized.²⁸⁹ A few days later, Abolfazl's entire family and relatives, including his aunts and uncles, were arrested while they were

preparing to celebrate his birthday at his gravesite.²⁹⁰ They were later released on bail pending trial.²⁹¹

Abolfazl's parents filed a complaint against the security forces involved in his death.²⁹² After an investigation, the Mashhad Revolutionary Guard and Public Prosecutor's Office announced that riot police forces had fatally shot Abolfazl.²⁹³ Since the accused were police personnel, the case was transferred to the Military Prosecutor's Office of Razavi Khorasan Province in Mashhad.²⁹⁴ In early November 2023, the Military Prosecutor's Office dismissed the complaint and prohibited any prosecution against the accused forces, stating that "no solid evidence has been found for the use of pellet-firing shotguns by military and law enforcement forces."295 According to Abolfazl's family attorney, Khosrow Alikordi, despite the presence of twenty CCTV cameras around the location where Abolfazl was shot and the identification, arrest, and interrogation of the student who took Abolfazl to the hospital using the videos of these CCTV cameras, the judicial officials did not permit access to the footage to identify the assailant.²⁹⁶

In early 2024, Khosrow Alikordi was sentenced to one year imprisonment, two years of exile, and a two-year ban on practicing law, all on charges of "disseminating propaganda against the Islamic Republic."²⁹⁷ On June 4, 2024, Abolfazl's father, Ali Adinezadeh, reported that he had been contacted by IRGC intelligence forces who threatened him with arrest unless he deleted his

Iran: Killings of Children During Youthful Antiestablishment Protests, Amnesty International (Dec. 9, 2022), https://www.amnesty.de/sites/ default/files/2022-12/Amnesty-Bericht-Iran-Toetung-Kinder-Jugendliche-Polizeigewalt-Dezember-2022.pdf; See also Parham Ghobadi, Abolfazl Adinezadeh: Teenage protester shot dead by security forces - sources, BBC (Oct. 20, 2022), available at https://www.bbc.com/news/world-middleeast-63328086; See also Fishār Nahād Hāay Āmnīyatī Az Ţarīq Ṣāḥib Khānih; Bar Khānivādih Abūlfażl Chi Mīguzarad? [The Pressure of Security Agencies Through the Landlord: What is Happening to Abolfazl Adinezadeh's Family?], IranWire (Mar. 12, 2023) available at https://iranwire.com/fa/features/114684-%D9%81%D8%B4%D8%A7%D8%B1-.

²⁸⁵ Iran: Killings of Children During Youthful Antiestablishment Protests, Amnesty International (Dec. 9, 2022), https://www.amnesty.de/sites/ default/files/2022-12/Amnesty-Bericht-Iran-Toetung-Kinder-Jugendliche-Polizeigewalt-Dezember-2022.pdf; See also Parham Ghobadi, Abolfazl Adinezadeh: Teenage protester shot dead by security forces - sources, BBC (Oct. 20, 2022), available at https://www.bbc.com/news/world-middleeast-63328086.

²⁸⁶ Id.

²⁸⁷ Iranian mother jailed for 13 years after denouncing death of son shot at protest, The Guardian (Nov. 2, 2023), https://www.theguardian.com/global-development/2023/nov/02/iran-mother-mahsa-yazdani-jailed-13-years-after-denouncing-death-of-son-shot-at-protest.

Iranian mother jailed for 13 years after denouncing death of son shot at protest, The Guardian (Nov. 2, 2023), https://www.theguardian.com/globaldevelopment/2023/nov/02/iran-mother-mahsa-yazdani-jailed-13-yearsafter-denouncing-death-of-son-shot-at-protest; See also Qanuni Mojazat Islami [Islamic Penal Code], Tehran 1392 [2013], art. 500, available at https:// iranhrdc.org/islamic-penal-code-of-the-islamic-republic-of-iran-book-five/. 289 Bāzdāsht Tamāmī A 'zāyi Khānivādih Va Bastigān Abūlfażl Ādīnih Zādih, Nūjavān Kushti Shudig Dar E 'tir 'zāt [The Arrest of the Entire Family and Relatives of Abolfazl Adinezadeh, the Teenager Killed During the Protests], Radio Farda (June 17, 2023), https://www.radiofarda.com/a/he-graveyardof-abolfazl-adinehvand-who-was-killed-in-an-antigovernment-protest-inmashhad/32462920.html.

²⁹⁰ Id.

²⁹¹ Āzādī Mūvaqat Pidar, Mādar Va Khāhari «Abūlfażl Ādīnih Zādih»; Bi Qiydi Vasīqih [Temporary Release of the Father, Mother, and Sister of "Abolfazl Adinezadeh"; Out on Bail], VOA Persian (June 21, 2023), https:// ir.voanews.com/a/adinezadeh-parents-freed-from-jail-on-bail/7145613. html.

²⁹² Ravāyati vakīl Khānivādih Ādīnih Zādih Az Ebhāmāt Parvandih Qatli Abūlfażl; E'tirāż Mīkunīm [Adinezadeh's Family Lawyer's Account of the Ambiguities of the Abolfazl Murder Case; We Appeal], IranWire (Nov. 8, 2023), https://iranwire.com/fa/features/122297-%D8%B1%D9%88%D8%A7 %DB%8C%D8%AA-.

²⁹³ Id.

²⁹⁴ Id.

²⁹⁵ Id.

²⁹⁶ Id.

²⁹⁷ Khusrū 'alī Kūrdī, Vakīl Khānivādih Hāay Dādkhāh, Barāyi Tahamūl Yīk Sāl Habs Zindānī Shud [Khosro Ali Kurdi, the Lawyer Representing the Families of the Killed Citizens, Was Imprisoned for One Year], Iran International (Feb. 18, 2024), https://www.iranintl.com/202402181972.

social media posts about his son.²⁹⁸ On July 24, 2024, Abolfazl's sister reported that their father had been arrested and transferred to prison.²⁹⁹

300 (سیاوش محمودی) G. Siavash Mahmoudi (سیاوش محمودی)



On September 25, 2022, 16-year-old Siavash Mahmoudi went missing during the protests in the Nazi Abad neighborhood in Tehran.³⁰¹ His mother, Leily Mahdavi, was unaware of his condition and whereabouts for hours.³⁰² She described the heavy presence of security forces in the Nazi Abad neighborhood and the brutality she witnessed firsthand.³⁰³ After a desperate search, she eventually found her son's lifeless body at a hospital mortuary, where she stayed all night to be allowed to see it.304 As recounted by his mother, Siavash still had extensive bleeding from the back of his head hours after being shot.³⁰⁵ According to the death certificate, the cause of death was cerebral hemorrhage and brain tissue damage resulting from the impact of a high-speed projectile (bullet).306

Siavash was laid to rest in Tehran's Behesht Zahra Cemetery.³⁰⁷ Following the funeral, his mother has become a vocal critic of her son's extrajudicial killing by security forces, even in the face of pressure to keep quiet.308 State officials have claimed that Siavash was killed by unknown individuals and that security forces did not use firearms at the time of his death.³⁰⁹ On August 23, 2023, Leily Mahdavi was reportedly served with a court summons during a search of her home by security forces, who also confiscated her cellphone.³¹⁰ On May 25, 2024, Mahdavi indicated that she faces restrictions on her ability to communicate openly on her social media accounts.³¹¹ On June 1, 2024, she also reported that a tree she had planted next to Siavash's grave in his memory had been vandalized.³¹²

²⁹⁸ Pidari Abūlfażl Ādīnih Zādih Az Tahdīd Tilifunī Sipāh Bi Bāzdāsht Khabar Dād [Abolfazl Adinezadeh's Father Reported the IRGC Threat Over the Phone to Arrest Him], Iran International (June 4, 2024), https://www.iranintl. com/202406049015.

²⁹⁹ ه مرضیه آدینه زاده @MarzieAdinezade, X (Jul. 24, 2024, 3:56 AM), https://x. com/marzieadinezade/status/1816019667388977316?s=48.

³⁰⁰ *Picture courtesy of Siavash Mahmoudi*, Obtained from the Instagram page of his mother Leily Mahdavi, https://www.instagram.com/p/ CxxQWweMPr1/ (last visited June 6, 2024).

³⁰¹ Iran: Killings of Children During Youthful Antiestablishment Protests, Amnesty International (Dec. 9, 2022), https://www.amnesty.de/sites/ default/files/2022-12/Amnesty-Bericht-Iran-Toetung-Kinder-Jugendliche-Polizeigewalt-Dezember-2022.pdf; See also Edāmih Fishār Bar Khānivādih Hāay Dādkhāh; Mādari Sīyāvash Mahmūdī Ehzār Shud [Continued Pressure on the Families of Killed Citizens; Siavash Mahmoudi's Mother Summoned], IranWire (Aug. 24, 2023), available at https://iranwire.com/fa/news-1/119791-%D8%A7%D8%AF%D8%A7%D9%85%D9%87-.

³⁰² Ravāyati Mādari Sīyāvash Maḥmūdī Az Kushti Shudani Farzandi 16 Sālihash [Siavash Mahmoudi's Mother's Account of the Killing of Her 16-Year-Old Son], IranWire (Dec. 16, 2022), https://iranwire.com/fa/news-1/111385-%D8%B1%D9%88%D8%A7%DB%8C%D8%AA-.

³⁰³ Id.

³⁰⁴ Id.

³⁰⁵ Id.

^{306 @1500}tasvir, X (Apr. 13, 2023, 5:36 AM), https://x.com/1500tasvir/ status/1646447312208551937.

³⁰⁷ Siyāvash Maḥmūdī [Siavash Mahmoudi], Yadcode, سياوش محمودی (yadcode.ir)(last visited June 4, 2024).

³⁰⁸ Iran: Killings of Children During Youthful Antiestablishment Protests, Amnesty International (Dec. 9, 2022), https://www.amnesty.de/sites/default/ files/2022-12/Amnesty-Bericht-Iran-Toetung-Kinder-Jugendliche-Polizeigewalt-Dezember-2022.pdf; See also RadioFarda[, (@ RadioFarda_), X (Sept. 30, 2022, 8:10 AM), available at https://twitter.com/ RadioFarda_/status/1575820462818574336; See also Mādari Sīyāvash Maḥmūdī: Rūzī Ārām Mīgīram Ki Eīn Dirakhti Zilm Rīshi Kan Shavad [Siavash Mahmoudi's Mother's: I Will Rest One Day When This Tree of Oppression (The Islamic Republic) Is Uprooted], Iran International (May 26, 2024), available at https://www.iranintl.com/202405268872.

³⁰⁹ Iran: Killings of Children During Youthful Antiestablishment Protests, Amnesty International (Dec. 9, 2022), https://www.amnesty.de/sites/ default/files/2022-12/Amnesty-Bericht-Iran-Toetung-Kinder-Jugendliche-Polizeigewalt-Dezember-2022.pdf.

³¹⁰ Mother of Killed Protester Summoned to Court, IranWire (Aug. 24, 2023) https://iranwire.com/en/news/119796-mother-of-killed-protestersummoned-to-court/; See also Edāmih Fishār Bar Khānivādih Hāay Dādkhāh; Mādari Sīyāvash Maḥmūdī Eḥzār Shud [Continued Pressure on the Families of Killed Citizens; Siavash Mahmoudi's Mother Summoned], IranWire (Aug. 24, 2023), available at https://iranwire.com/fa/news-1/119791-%D8%A7%D8%AF%D8%A7%D9%85%D9%87-.

^{Mādari Siyāvash Maḥmūdī: Rūzī Ārām Mīgīram Ki Ein Dirakhti} *Zilm Rīshi Kan Shavad [Siavash Mahmoudi's Mother's: I Will Rest One Day* When This Tree of Oppression (The Islamic Republic) Is Uprooted], Iran International (May 26, 2024), https://www.iranintl.com/202405268872.
BBC NEWS فارسي (@bbcpersian), X (June 1, 2024, 1:41 AM), https://x. com/bbcpersian/status/1796779088658477262.

H. Danial (Daniyal) Pabandi (دانيال يابندى)³¹³



On November 16, 2022, 17-year-old Danial Pabandi was fatally shot in the Karim Abad neighborhood in Saqqez, Kurdistan Province.³¹⁴ Reports indicate that several IRGC-controlled Basij militia members targeted Danial while he was riding on a motorcycle.³¹⁵ Witnesses at the scene observed large, open wounds and severe bleeding after he was shot, suggesting he was struck with live ammunition.³¹⁶ Danial's father, Bahman Pabandi, later asserted that the individuals involved in his son's extrajudicial killing were allegedly traveling in a Peugeot with no license plate.³¹⁷

Danial was then taken to Tamin Ejtemaei Hospital

of Saqqez, where he was pronounced dead.³¹⁸ When the news of Danial's death spread through the city, people gathered outside the hospital, attempting to prevent security forces from abducting his body.³¹⁹

Inside the hospital, local officials approached Danial's family with a proposition: to grant him the title of Shahīd (martyr) on the condition that the details of the incident would be presented in line with the state's narrative. After the family declined the offer, security forces covertly transported Danial's body to Aichi Cemetery in Saqez under the cover of darkness after midnight. They planned to bury him without the knowledge or consent of his family, but the family arrived before the burial.³²⁰ Security forces then denied the family the right to prepare him for burial according to their religious and cultural traditions.³²¹

Since his death, Danial's family has been pressured to stay silent.³²² Despite seeking justice through filing a formal complaint, they have yet to receive any resolution. Additionally, security forces have prevented them from holding any memorial services.³²³ On January 13, 2024, Danial's brother, Reza Pabandi, disclosed that the title of Shahīd had been removed from his gravestone as an act of vandalism.³²⁴

³¹³ *Picture courtesy of Danial Pabandi*, obtained from the Instagram page of his brother Reza Pabandi, https://www.instagram.com/p/CrWLhUnuc_M/ (last visited June 6, 2024).

³¹⁴ Iran: Killings of Children During Youthful Antiestablishment Protests, Amnesty International (Dec. 9, 2022), https://www.amnesty.de/sites/ default/files/2022-12/Amnesty-Bericht-Iran-Toetung-Kinder-Jugendliche-Polizeigewalt-Dezember-2022.pdf; See also A teenager from Saqqez was killed by direct fire from government forces, Hengaw (Nov. 16, 2022), available at https://hengaw.net/en/news/2022/11/a-teenager-from-saqqez-was-killedby-direct-fire-from-government-forces; See also Ārāmgāh Āychī Dar Saqiz: Yādmān Hāayi Barāy Dādkhāhī Mashā va Kushti Hā [Aichi Cemetery in Saqqez; Memorials Seeking Justice for Mahsa and Other Killed Citizens], IranWire (Dec. 27, 2022), available at https://iranwire.com/fa/specialfeatures/111896-%D8%A2%D8%B1%D8%A7%D9%85%DA%AF%D8%A7 %D9%87-.

³¹⁵ *Iran: Killings of Children During Youthful Antiestablishment Protests*, Amnesty International (Dec. 9, 2022), https://www.amnesty.de/sites/ default/files/2022-12/Amnesty-Bericht-Iran-Toetung-Kinder-Jugendliche-Polizeigewalt-Dezember-2022.pdf; *See also* Farzad Seifikaran (@FSeifikaran), X (Nov. 17, 2022, 4:54 PM), available at https://twitter.com/FSeifikaran/ status/1593362031385665538.

³¹⁶ Kūrdpā; Jān Bākhtani 118 shahrvandi Kūrd Dar Jaryān Khizish Sarāsarī [Kurdpa; The Death of 118 Kurdish Citizens During the Nationwide Uprising], Kurdpa (Dec. 11, 2022), كَرْدِيا: جَانِبَاحْنَ ١١١ شهروند كُرد در جريان خيزش سراسرى), (kurdpa.net); See also Mādari Dānīyāl Pābandī: Man Dādkhāh Khūni Farzandam Hastam [Daniyal Pabandi's Mother: I Am Seeking Justice for My Son], IranWire (Dec. 26, 2022), available at https://iranwire.com/fa/ news-1/111886-%D9%85%D8%A7%D8%AF%D8%B1-%D8%AF%D8%AF%D8%A7% D9%86%DB%8C%D8%A7%D9%84-.

³¹⁷ Farzad Seifikaran (@FSeifikaran), X (Nov. 17, 2022, 4:54 PM), https:// twitter.com/FSeifikaran/status/1593362031385665538 [depicting Danial's father, Bahman Pabandi, asserting that Danial was a child worker and witnesses on the scene saw a Peugeot without a license plate shoot him in the back.]

³¹⁸ Dānīyāl Pābandī, Kushti E'tirāžāt Saqiz Chigūnih Bi Khāk Sipurdih Shud? [How Danial Pabandi, Killed During the Protests, Was Buried?], IranWire (Nov. 17, 2022), https://iranwire.com/fa/special-features/109991-%D8%AF%D8%A7%D9%86%DB%8C%D8%A7%D9%84-.

³¹⁹ Unleashed Violence: Repression of Protests in Kurdish Areas of Iran-September 2022 - December 2022, Iran Human Rights Documentation Center (June 30, 2023), https://iranhrdc.org/protests-in-the-kurdish-areasof-iran/#_thref469.

³²⁰ Dānīyāl Pābandī, Kushti E 'tirāžāt Saqiz Chigūnih Bi Khāk Sipurdih Shud? [How Danial Pabandi, Killed During the Protests, Was Buried?], IranWire (Nov. 17, 2022), https://iranwire.com/fa/special-features/109991-%D8%AF%D8%A7%D9%86%DB%8C%D8%A7%D9%84-.

³²¹ Iran: Killings of Children During Youthful Antiestablishment Protests, Amnesty International (Dec. 9, 2022), https://www.amnesty.de/sites/ default/files/2022-12/Amnesty-Bericht-Iran-Toetung-Kinder-Jugendliche-Polizeigewalt-Dezember-2022.pdf.

³²² Id.

³²³ Kushti Hāay E 'tirāzāt; Khānivādih Dānīyāl Pābandī Az Barguzārī Marāsim Sālrūz Ou Man ' Shudand [The Killed Citizens during the Protests; Daniyal's Family Was Banned from Celebrating His Birthday], IranWire (Nov. 16, 2023), https://iranwire.com/fa/special-features/122583-%DA%A9%D8% B4%D8%AA%D9%87%D9%87%D8%A7%DB%8C-.

³²⁴ RadioFarda اراديو فردا (@RadioFarda_), X (Jan. 13, 2024, 9:24 AM), https://x.com/RadioFarda_/status/1746176307539349774. Individuals independently, and without any government influence, refer to those killed in the protests as martyrs.

I. Sarina Saedi (سارینا ساعدی)³²⁵



On October 27, 2022, 15-year-old Sarina Saedi died after being struck over the head with a baton by security forces in Sanandaj, in Kurdistan Province, western Iran.326 Sarina was active in the Woman, Life, Freedom protests.³²⁷ At school, on at least one occasion she tore pictures of the former and current Supreme Leaders from her book, she also removed the Supreme Leaders' portraits from the classroom, and stepped on them as a form of protest.³²⁸ After school hours, she and her classmates wrote anti-regime slogans on the walls.³²⁹ According to a source close to her family, school officials identified her as the leader of the protests and alleged that she incited other students to participate.³³⁰ On the day of her death, Sarina and her classmates were chanting when security forces cornered them in a dead-end alley.³³¹ Sarina intervened to protect her friends from further assault by security forces by positioning herself between them, during which she sustained multiple blows to the head.³³²

332 Id.

After that, Sarina returned home and went to bed.³³³Thenextday, shewasfoundunresponsive.³³⁴ Rushed to Tohid Hospital in Sanandaj, she was pronounced dead due to a brain hemorrhage caused by the blow to the head.³³⁵

While at the hospital, Sarina's family faced intense pressure to remain silent regarding her death.³³⁶ Security forces reportedly confiscated her father's phone and warned the family that their phones would be tapped.³³⁷ Her family was detained at the hospital overnight and was not allowed to leave until Sarina's burial.³³⁸ Her body was transferred to Behesht Mohammadi Cemetery in Sanandaj and buried after midnight under tight security, with only a few close family members permitted to attend.³³⁹ Reports indicate that Sarina's father was forced to go on camera and declare that she died by suicide, otherwise, security officials would not have allowed him to

³²⁵ *Picture courtesy of Sarina Saedi*, obtained from the Instagram page of her father Hashem Saedi, https://www.instagram.com/p/C5-JBavO_pf/ (last visited Aug. 1, 2024).

Iran: Killings of Children During Youthful Antiestablishment Protests, Amnesty International (Dec. 9, 2022), https://www.amnesty.de/sites/ default/files/2022-12/Amnesty-Bericht-Iran-Toetung-Kinder-Jugendliche-Polizeigewalt-Dezember-2022.pdf; See also In the Sanandaj uprisings, a 16-year-old girl was killed, Hengaw (Oct. 28, 2022), available at https:// hengaw.net/en/news/in-the-sanandaj-uprisings-a-16-year-old-girl-was-killed; See also Farzad Seifikaran, Sarina Saedi, a 15-year-old Teenage Killed by Sever Baton Blows in Sanandaj, Zamaneh Media (Jan. 11, 2023), available at https:// en.radiozamaneh.com/33282/.

³²⁷ Farin Assemi, Sārīnā Sā 'īdī, 15 Sālih, Dar Chilhlūm Mahsā Āmīnī Dar Sanandaj Maşdūm Shud Va Hamān Sahb Jān Sipurd [Sarina Saedi, 15 Years Old, Was Injured in Sanandaj on the 40th Day After Mahsa's Death and Died the Same Night], BBC Persian (Oct. 17, 2023), https://www.bbc.com/persian/ articles/c14vze8d8yvo.

³²⁸ Id.

³²⁹ Id.330 Id.

³³¹ Id.

Iran: Killings of Children During Youthful Antiestablishment Protests,
 Amnesty International (Dec. 9, 2022), https://www.amnesty.de/sites/
 default/files/2022-12/Amnesty-Bericht-Iran-Toetung-Kinder-Jugendliche Polizeigewalt-Dezember-2022.pdf; See also Farzad Seifikaran, Sarina Saedi,
 a 15-year-old Teenage Killed by Sever Baton Blows in Sanandaj, Zamaneh
 Media (Jan. 11, 2023), available at https://en.radiozamaneh.com/33282/.
 Id.

³³⁵ Iran: Killings of Children During Youthful Antiestablishment Protests, Amnesty International (Dec. 9, 2022), https://www.amnesty.de/sites/ default/files/2022-12/Amnesty-Bericht-Iran-Toetung-Kinder-Jugendliche-Polizeigewalt-Dezember-2022.pdf; See also, In the Sanandaj uprisings, a 16-year-old girl was killed, Hengaw (Oct. 28, 2022), available at https:// hengaw.net/en/news/in-the-sanandaj-uprisings-a-16-year-old-girl-waskilled; See also Farzad Seifikaran, Sarina Saedi, a 15-year-old Teenage Killed by Sever Baton Blows in Sanandaj, Zamaneh Media (Jan. 11, 2023), available at https://en.radiozamaneh.com/33282/.\

<sup>Iran: Killings of Children During Youthful Antiestablishment Protests,
Amnesty International (Dec. 9, 2022), https://www.amnesty.de/sites/
default/files/2022-12/Amnesty-Bericht-Iran-Toetung-Kinder-JugendlichePolizeigewalt-Dezember-2022.pdf; See also Farzad Seifikaran, Sarina Saedi,
a 15-year-old Teenage Killed by Sever Baton Blows in Sanandaj, Zamaneh
Media (Jan. 11, 2023), available at https://en.radiozamaneh.com/33282/.
Farzad Seifikaran, Sarina Saedi, a 15-year-old Teenage Killed by
Sever Baton Blows in Sanandaj, Zamaneh Media (Jan. 11, 2023), https://
en.radiozamaneh.com/33282/.</sup>

³³⁸ Iran: Killings of Children During Youthful Antiestablishment Protests, Amnesty International (Dec. 9, 2022), https://www.amnesty.de/sites/ default/files/2022-12/Amnesty-Bericht-Iran-Toetung-Kinder-Jugendliche-Polizeigewalt-Dezember-2022.pdf; See also Farzad Seifikaran, Sarina Saedi, a 15-year-old Teenage Killed by Sever Baton Blows in Sanandaj, Zamaneh Media (Jan. 11, 2023), available at https://en.radiozamaneh.com/33282/.

In the Sanandaj uprisings, a 16-year-old girl was killed, Hengaw (Oct. 28, 2022), https://hengaw.net/en/news/in-the-sanandaj-uprisings-a-16-year-old-girl-was-killed; See also Farzad Seifikaran, Sarina Saedi, a 15-year-old Teenage Killed by Sever Baton Blows in Sanandaj, Zamaneh Media (Jan. 11, 2023), available at https://en.radiozamaneh.com/33282/; See also Farin Assemi, Sārīnā Sā 'īdī, 15 Sālih, Dar Chilhlūm Mahsā Āmīnī Dar Sanandaj Maşdūm Shud Va Hamān Sahb Jān Sipurd [Sarina Saedi, 15 Years Old, Was Injured in Sanandaj on the 40th Day After Mahsa's Death and Died the Same Night], BBC Persian (Oct. 17, 2023), available at https://www.bbc.com/persian/articles/c14vze8d8yvo.

retrieve the body.³⁴⁰ Although her death certificate listed the cause of death as "unknown," the governor of Sanandaj claimed that she died from either drug use or suicide.³⁴¹ Additionally, a teacher reported on state media that Sarina may have struggled with suicidal thoughts the previous year.³⁴² Alongside the contradictory statements suggesting her death was unrelated to her participation in the protests, the harassment of her family continued. Her father, Hashem Saedi, was sentenced to six months of imprisonment and 40 lashes, while her brother and aunt were arrested and held in custody for a few days before her death anniversary.³⁴³

J. Nima Shafaghdoost (نيما شفق دوست)³⁴⁴



On October 5, 2022, 16-year-old Nima Shafaghdoost died in Orumiyeh, West Azerbaijan Province, succumbing to an infection resulting from untreated bullet wounds inflicted by security forces.³⁴⁵ On September 21, Nima participated in protests in Orumiyeh, where he was shot multiple times in the legs.³⁴⁶ Fearing arrest by security forces stationed at hospitals, his family chose not to seek medical attention for Nima.³⁴⁷ Instead, he received treatment at a private doctor's office and at home.³⁴⁸ When the infection became severe, his family rushed him to Imam Khomeini Hospital in Orumiyeh, where he died shortly afterward.³⁴⁹

Security forces then transferred his body from the hospital to the Orumiyeh Coroner's Office, where they refused to release it to his family for two days.³⁵⁰ According to Nima's mother, his funeral was conducted under strict security measures, and the family was instructed not to speak out about his death, under the threat of harm to other young family members.³⁵¹ The Orumiyeh chief of police publicly announced that Nima's death had no connection to the protests, asserting that he died from an untreated

349 Family of killed boy 'threatened' to lie about cause of death, says mother, Kurdistan Human Rights Network (Jan. 3, 2023), https:// kurdistanhumanrights.org/en/news/2023/01/03/family-of-killed-boythreatened-to-lie-about-cause-of-death-says-mother/; See also Mādari Nīmā Shafaq Dūst: Pisaram Bā Gulūlih Nīrū Hāay Amnīyatī Kushti Shud Va Khānivādih Rā Majbūr Kardand Bigūyīm Dar Asari Hmlih Sag Fut Kardi Ast [Mother of Nima Shafaghdoost: My Son Was Shot Dead by Security Forces, and the Family Was Forced to Say He Died from a Dog Attack], Kurdistan Human Rights Network (Jan. 3, 2023), available at https:// kurdistanhumanrights.org/fa/news-fa/childrens-rights-fa/2023/01/03/ p19908/.

³⁴⁰ Iran: Killings of Children During Youthful Antiestablishment Protests, Amnesty International (Dec. 9, 2022), https://www.amnesty.de/sites/ default/files/2022-12/Amnesty-Bericht-Iran-Toetung-Kinder-Jugendliche-Polizeigewalt-Dezember-2022.pdf; See also In the Sanandaj uprisings, a 16-year-old girl was killed, Hengaw (Oct. 28, 2022), available at https:// hengaw.net/en/news/in-the-sanandaj-uprisings-a-16-year-old-girl-was-killed; See also Farzad Seifikaran, Sarina Saedi, a 15-year-old Teenage Killed by Sever Baton Blows in Sanandaj, Zamaneh Media (Jan. 11, 2023), available at https:// en.radiozamaneh.com/33282/.

^{Iran: Killings of Children During Youthful Antiestablishment Protests,} Amnesty International (Dec. 9, 2022), https://www.amnesty.de/sites/ default/files/2022-12/Amnesty-Bericht-Iran-Toetung-Kinder-Jugendliche-Polizeigewalt-Dezember-2022.pdf; See also Farzad Seifikaran, Sarina Saedi, a 15-year-old Teenage Killed by Sever Baton Blows in Sanandaj, Zamaneh Media (Jan. 11, 2023), available at https://en.radiozamaneh.com/33282/.
Id.

³⁴³ Farin Assemi, Sārīnā Sā 'īdī, 15 Sālih, Dar Chilhlūm Mahsā Āmīnī Dar Sanandaj Maşdūm Shud Va Hamān Sahb Jān Sipurd [Sarina Saedi, 15 Years Old, Was Injured in Sanandaj on the 40th Day After Mahsa's Death and Died the Same Night], BBC Persian (Oct. 17, 2023), https://www.bbc.com/persian/ articles/c14vze8d8yvo.

³⁴⁴ *Picture courtesy of Nima Shafaghdoost*, Obtained from Kurdistan Human Rights, https://kurdistanhumanrights.org/fa/news-fa/childrensrights-fa/2023/01/03/p19908 (last visited Aug. 15, 2024).

³⁴⁵ Iran: Killings of Children During Youthful Antiestablishment Protests, Amnesty International (Dec. 9, 2022), https://www.amnesty. de/sites/default/files/2022-12/Amnesty-Bericht-Iran-Toetung-Kinder-Jugendliche-Polizeigewalt-Dezember-2022.pdf; See also Family of killed boy 'threatened' to lie about cause of death, says mother, Kurdistan Human Rights Network (Jan. 3, 2023), available at https://kurdistanhumanrights.org/en/ news/2023/01/03/family-of-killed-boy-threatened-to-lie-about-cause-ofdeath-says-mother/.

³⁴⁶ Id.

³⁴⁷ Id.

³⁴⁸ Mādari Nīmā Shafaq Dūst: Pisaram Bā Gulūlih Nīrū Hāay Amnīyatī Kushti Shud Va Khānivādih Rā Majbūr Kardand Bigūyīm Dar Asari Ḥmlih Sag Fut Kardi Ast [Mother of Nima Shafaghdoost: My Son Was Shot Dead by Security Forces, and the Family Was Forced to Say He Died from a Dog Attack], Kurdistan Human Rights Network

³⁵⁰ Mādari Nīmā Shafaq Dūst: Pisaram Bā Gulūlih Nīrū Hāay Amnīyatī Kushti Shud Va Khānivādih Rā Majbūr Kardand Bigūyīm Dar Asari Hmlih Sag Fut Kardi Ast [Mother of Nima Shafaghdoost: My Son Was Shot Dead by Security Forces, and the Family Was Forced to Say He Died from a Dog Attack], Kurdistan Human Rights Network (Jan. 3, 2023), https:// kurdistanhumanrights.org/fa/news-fa/childrens-rights-fa/2023/01/03/ p19908/.

³⁵¹ Family of killed boy 'threatened' to lie about cause of death, says mother, Kurdistan Human Rights Network (Jan. 3, 2023), https:// kurdistanhumanrights.org/en/news/2023/01/03/family-of-killedboy-threatened-to-lie-about-cause-of-death-says-mother/; See also IranHumanRights.org (@ICHRI), X (Jan. 3, 2023, 1:21 PM), available at https://twitter.com/ICHRI/status/1610340613962235904.

dog bite.³⁵² In an effort to legitimize this narrative, security forces coerced and threatened family members to align with the police chief's version of events.³⁵³ Three months after Nima's death, his mother broke her silence, deviating from the state's false narrative.³⁵⁴

K. Kian Pirfalak (کیان پیرفلک)³⁵⁵



On November 16, 2022, 9-year-old Kian Pirfalak and his family were driving home in Izeh, Khuzestan Province, southwest Iran.³⁵⁶ According to a source

353 Iran: Killings of Children During Youthful Antiestablishment Protests, Amnesty International (Dec. 9, 2022), https://www.amnesty.de/sites/ default/files/2022-12/Amnesty-Bericht-Iran-Toetung-Kinder-Jugendliche-Polizeigewalt-Dezember-2022.pdf; See also Family of killed boy 'threatened' to lie about cause of death, says mother, Kurdistan Human Rights Network (Jan. 3, 2023), available at https://kurdistanhumanrights.org/en/news/2023/01/03/ family-of-killed-boy-threatened-to-lie-about-cause-of-death-says-mother/; See also IranHumanRights.org (@ICHRI), X (Jan. 3, 2023, 1:21 PM), available at https://twitter.com/ICHRI/status/1610340613962235904.

354 Family of killed boy 'threatened' to lie about cause of death, says mother, Kurdistan Human Rights Network (Jan. 3, 2023), https:// kurdistanhumanrights.org/en/news/2023/01/03/family-of-killedboy-threatened-to-lie-about-cause-of-death-says-mother/; See also IranHumanRights.org (@ICHRI), X (Jan. 3, 2023, 1:21 PM), available at https://twitter.com/ICHRI/status/1610340613962235904.

355 *Picture courtesy of Kian Pirfalak*, obtained from the Instagram page of his father Meysam Pirfalak, https://www.instagram.com/p/Cq8rKBJLK5_/?img_index=2 (last visited Aug. 1, 2024).

close to Pirflek's family, they navigated side streets to avoid the protest area while driving home. However, at an intersection, police officers instructed them to change their route and drive in the opposite direction. Shortly after, they encountered another group of security forces that fired at their car from close range.³⁵⁷ This incident resulted in severe injuries to Kian's father, Meysam Pirfalak, and the tragic death of Kian.³⁵⁸

That night, six other citizens, including two children, were shot and killed by security forces around the Izeh's market.³⁵⁹ The Islamic Republic swiftly Mohammad Eqbal Shahnavazi, attributed these killings to terrorist groups.³⁶⁰ A few hours later, Iran's government-run IRNA news agency published an alleged Islamic State of Iraq and ash-Sham (ISIS) statement claiming that the terror group had claimed responsibility for the attack.³⁶¹ However, the statement was not published by the official ISIS outlet Amaq, and IRNA later removed the report without any explanation.³⁶² This

³⁵² Iran: Killings of Children During Youthful Antiestablishment Protests, Amnesty International (Dec. 9, 2022), https://www.amnesty.de/sites/ default/files/2022-12/Amnesty-Bericht-Iran-Toetung-Kinder-Jugendliche-Polizeigewalt-Dezember-2022.pdf; See also Shiykh Nizhād, Farmāndihī Entizāmī Ūrūmīyih: «Nīmā Shafaq Dūst» Bar Asari Sag Gazīdīgī Fūt Kardih; Na Tajamu ʿāt Akhīr Ūrūmīyih [Sheikh Nejad, Orumiyeh's Police Chief: "Nima Shafaghdoost" Died Due to a Gog Bite; Not the Recent Protests in Orumiyeh], Etemadonline (Oct. 16, 2022), available at https://www.etemadonline. com/%D8%A8%D8%AE%D8%B4-%D8%B3%DB%8C%D8%A7%D8%B3%D B%8C-9/578070-.

<sup>Iran: Killings of Children During Youthful Antiestablishment
Protests, Amnesty International (Dec. 9, 2022), https://www.amnesty.
de/sites/default/files/2022-12/Amnesty-Bericht-Iran-Toetung-Kinder-Jugendliche-Polizeigewalt-Dezember-2022.pdf; See also Artemis
Moshtaghian, et al., Children's Deaths 'Must Stop' in Iran, Say UNICEF, as
Protests Continue, CNN, (Nov. 19, 2022), available at https://www.cnn.
com/2022/11/19/middleeast/iran-unicef-children-death-intl/index.html;
See also Khānivādih Kīyān Pirfalak: Ravāyati Ja 'lī Hukūmat Darbārih Qātil Kīyān Rā Qabūl Nadarīm [Kian Pirfalak's Family: We Reject the State's
False Narrative About the Murderer], IranWire (Dec. 27, 2022), available
at https://iranwire.com/fa/news-1/111926-%D8%AD%D8%B3%D8%B3%D9%86-%D8%B3%D8%AF%DB%8C%D8%AF%DB%8C-%D9%85%D8%AD%D9%85</sup>

³⁵⁷ Samaneh Ghadarkhan, Film Dūrīn Hāayi Ki Ṣaḥnih Qatli Kīyān Pīrfalak Ra Sabt karidi And, Kujāst?[Where Is the CCTV Camera Footage that Recorded the Murder Scene of Kian Pirfalak], IRANWIRE (Nov. 23, 2023), https://iranwire.com/fa/features/122976.

³⁵⁸ Iran: Killings of Children During Youthful Antiestablishment Protests, Amnesty International (Dec. 9, 2022), https://www.amnesty. de/sites/default/files/2022-12/Amnesty-Bericht-Iran-Toetung-Kinder-Jugendliche-Polizeigewalt-Dezember-2022.pdf; See also Artemis Moshtaghian, et al., Children's Deaths 'Must Stop' in Iran, Say UNICEF, as Protests Continue, CNN, (Nov. 19, 2022), available at https://www. cnn.com/2022/11/19/middleeast/iran-unicef-children-death-intl/ index.html; See also David Gritten, Iran Protests: Two Boys Shot Dead by Security Forces, Family Sources Say, BBC (Nov. 17, 2022), available at https://www.bbc.com/news/world-middle-east-63661310; See also Khānivādih Kīyān Pīrfalak: Ravāyati Ja 'lī Hukūmat Darbārih Qātil Kīyān Rā Qabūl Nadarīm [Kian Pirfalak's Family: We Reject the State's False Narrative About the Murderer], IranWire (Dec. 27, 2022), available at https://iranwire.com/fa/news-1/111926-%D8%AD%D8%B3%D9%86-%D8%B3%D8%B9%DB%8C%D8%AF%DB%8C-%D9%85%D8%AD%D9% 85%D9%88%D8%AF-.

Tīrandāzī Ezih; Shumār Kushti Hā Bi 7 Nafar Risīd; Qabūl Mas 'ūlīyat Dā 'ish Ja 'lī Ast [Izeh's Shooting; The Number of Dead Reached 7 People; ISIS's Claim of Responsibility Is "Fake"], BBC Persian (Nov. 16, 2022), https://www. bbc.com/persian/iran-63657038; See also Rasānih Hāay Hukūmatī: Hamlih Musalahānih Bi Mardum Dar Bāzār Ezih [State Media: Armed Attack on People in Izeh Market], Deutsche Welle Persian (Nov. 16, 2022), available at or People in Izeh Market] – رسانههای حکومتی: حمله مسلحانه به مردم در بازار ایذه

³⁶⁰ Iran: Killings of Children During Youthful Antiestablishment Protests, Amnesty International (Dec. 9, 2022), https://www.amnesty.de/sites/ default/files/2022-12/Amnesty-Bericht-Iran-Toetung-Kinder-Jugendliche-Polizeigewalt-Dezember-2022.pdf.

Solmaz Ikdar, Kīyān Pirfalak; Khudāy Rangīn Kamān Va Durūgh Hāay Tikrārī Jumhūrī Eslāmī [Kian Pirflek; The God of Rainbows and Repeated Lies of the Islamic Republic], IranWire (Nov. 18, 2022), https:// iranwire.com/fa/features/110010-%DA%A9%DB%8C%D8%A7%D9%86-.
 Id.

statement was later proven to be fake.³⁶³

Despite this, the families of those killed, including Artin Rahmani Bayati, 16, and Sepehr Maghsudi, 14, were pressured to support the state's narrative that a terrorist group was responsible for the murders.³⁶⁴ The official page of the Armed Forces General Staff Search Committee for Missing Persons listed four of the killed citizens in Izeh, including Kian, as Shahīd (martyr).³⁶⁵

Fearing that his body might be abducted by security forces, Kian's family kept his body at home until his funeral, attempting to preserve it by placing ice on it.³⁶⁶ At Kian's funeral, his mother, Mahmonir Molaei Rad, rejected the state's narrative about terrorist groups, providing details that implicated security forces.³⁶⁷ A day after the funeral, state media released a video of her, stating that her previous statements did not indicate security forces' responsibility and that an investigation was underway.³⁶⁸ These statements were met with skepticism due to the distressed

appearance of Mahmonir Molaei Rad.³⁶⁹ Kian's close relatives declared that his mother's assertions in the state media contradicted her earlier statements.³⁷⁰ Furthermore, Mahmonir Molaei Rad has consistently maintained that security forces are solely responsible for Kian's death since then.³⁷¹

On November 18, 2022, state authorities carried out several arrests in connection with the Izeh killings, asserting that the detainees were apprehended while attempting to flee the country via the northwest border.³⁷² However, leaked audio by a hacktivist group suggests that these arrests were unrelated to the Izeh killings.³⁷³ On December 20, 2022, security forces raided a house in a village near Izeh, engaging in heavy gunfire that resulted in the deaths of two individuals and the arrest of one.³⁷⁴ All three were accused of murdering seven citizens, including Kian, on November 16.³⁷⁵ The surviving accused, Mojahed (Abbas) Kourkouri, was sentenced to death in April 2023.³⁷⁶

Shortly after that, Kian's father released a video asserting that Kourkouri is innocent, because he and his wife "saw with their own eyes" that security forces shot at their car on the night of

³⁶³ Tīrandāzī Ezih; Shumār Kushti Hā Bi 7 Nafar Risīd; Qabūl Mas 'ūlīyat Dā 'ish Ja 'lī Ast [Izeh's Shooting; The Number of Dead Reached 7 People; ISIS's Claim of Responsibility Is "Fake"], BBC Persian (Nov. 16, 2022), https://www. bbc.com/persian/iran-63657038.

³⁶⁴ دادبان (@dadban4), X (Nov. 12, 2023, 8:00 AM), https://x.com/dadban4/ status/1723687119544099046; *See also* Masih Alinejad, فراهوشان فی کنیم [We Never Forget You], Instagram (Feb. 22, 2023), https://www.instagram.com/p/ Co9d2AQIon_/?img_index=4.

³⁶⁵ Taşāvīr Shuhadāy Mazlūm Eghtishāshāt Sāl 1401 [Pictures of the Oppressed Martyrs of the Riots of 2022], Tafahoseshohada, https://www. tafahoseshohada.ir/fa/album/840/%D8%AA%D8%B5%D8%A7%D9%88%D B%8C%D8%B1-%D8%B4%D9%87%D8%AF%D8%A7%DB%8C- (last visited may 31, 2024).

³⁶⁶ Solmaz Ikdar, Kīyān Pīrfalak; Khudāy Rangīn Kamān Va Durūgh Hāay Tikrārī Jumhūrī Eslāmī [Kian Pirflek; The God of Rainbows and Repeated Lies of the Islamic Republic], IranWire (Nov. 18, 2022), https://iranwire.com/fa/ features/110010-%DA%A9%DB%8C%D8%A7%D9%86-.

³⁶⁷ Iran: Killings of Children During Youthful Antiestablishment Protests, Amnesty International (Dec. 9, 2022), https://www.amnesty.de/sites/ default/files/2022-12/Amnesty-Bericht-Iran-Toetung-Kinder-Jugendliche-Polizeigewalt-Dezember-2022.pdf; See also Artemis Moshtaghian, et al., *Children's Deaths 'Must Stop' in Iran, Say UNICEF, as Protests Continue*, CNN, (Nov. 19, 2022), available at https://www.cnn.com/2022/11/19/middleeast/ iran-unicef-children-death-intl/index.html.

³⁶⁸ Iran: Killings of Children During Youthful Antiestablishment Protests, Amnesty International (Dec. 9, 2022), https://www.amnesty.de/sites/default/ files/2022-12/Amnesty-Bericht-Iran-Toetung-Kinder-Jugendliche-Polizeigewalt-Dezember-2022.pdf; See also Artemis Moshtaghian, et al., Children's Deaths 'Must Stop' in Iran, Say UNICEF, as Protests Continue, CNN, (Nov. 19, 2022), available at https://www.cnn.com/2022/11/19/middleeast/ iran-unicef-children-death-intl/index.html; See also also (@ IranNewspaper), X (Nov. 18, 2022, 4:10 PM), available at https://twitter.com/ IranNewspaper/status/1593713187559559168?s=20&t=U_ L3PkapPnTyzm798081rA.

³⁶⁹ Iran: Killings of Children During Youthful Antiestablishment Protests, Amnesty International (Dec. 9, 2022), https://www.amnesty.de/sites/ default/files/2022-12/Amnesty-Bericht-Iran-Toetung-Kinder-Jugendliche-Polizeigewalt-Dezember-2022.pdf.

³⁷⁰ Maryam Sinaiee, *Ten-Year-Old Victim's Mother Forced To Deny Criticism Of Iran's Leader*, Iran International (Nov. 19, 2022), https://www. iranintl.com/en/202211198693.

³⁷¹ *Slain Child's Mother Under House Arrest*, IranWire (June 15, 2023), https://iranwire.com/en/news/117553-slain-childs-mother-under-house-arrest/.

³⁷² Muḥsin Riżāeī: ʿāmilān Qatli Kīān Pīrfalak dar marzi Bākū Dastgīr Shudand [Mohsen Rezaei: The Perpetrators of Kian Pirfalak Murder Were Arrested at the Baku Border], IranWire (Nov. 18, 2022), https://iranwire. com/fa/news-1/110019-%D9%85%D8%AD%D8%B3%D9%86-%D8%B1%D 8%B6%D8%A7%DB%8C%DB%8C-.

³⁷³ Id.

^{Entishār Ravāyati Mutafāvit Dar Shabakih Hāay Ejtimā ī Az Hamlih} Mamūrān Hukūmatī dar Yīk Rūstāi Izih [Publishing a Different Narrative on Social Media About the Attack by State Forces in a Village in Izeh], Radio
Farda (Dec. 23, 2022), https://www.radiofarda.com/a/32190733.html.
Id.

³⁷⁶ Iran: Man at risk of protest-related execution: Mojahed (Abbas) Kourkouri, Amnesty International (Jul. 5, 2023), https://www.amnesty. org/en/documents/mde13/6935/2023/en/; Iran's Supreme Court upheld Mojahed (Abbas) Kourkouri's death sentence in December 2023. See Iran: Further information: Man facing imminent protest-related execution: Mojahed Kourkou, Amnesty International (Jan. 5, 2024). https://www.amnesty.org/en/ documents/mde13/7565/2024/en/.

November 16.³⁷⁷ Meysam Pirfalak also added that he is not pursuing any charges against Kourkouri.³⁷⁸ Kian's mother, who was very outspoken about the death of her child, was reportedly threatened with the deaths of her husband and another son.³⁷⁹ On June 11, 2023, her 19-year-old cousin, Pouya Molaei-Rad, was fatally shot near Izeh cemetery, where people had gathered to celebrate Kian's birthday.³⁸⁰ Subsequently, Mahmonir Molaei Rad's social media accounts were deleted, and she vanished from the public eye.³⁸¹ According to at least one report, she has been under strict surveillance, including house arrest, since then.³⁸²

L. Children of Sistan and Baluchestan Province



[L-R] Hasti Narouei (7), Ali Barahouei (14), Mosayeb Shahbakhsh (9)

Id. In Islamic jurisprudence, the concept of Qisas (retribution) allows the victim of a bodily injury to exact retribution on the perpetrator. In cases of murder, this right is granted to the victim's relatives, typically the father or, in the father's absence, the grandfather. The term qisas-i nafs refers to instances where the victim's family requests the execution of the perpetrator. See Qanuni Mojazat Islami [Islamic Penal Code], Tehran 1392 [2013], art. 351. In the case of Kian Pirfalak, Mojahed (Abbas) Kourkouri was found guilty of his murder, giving Kian's father the right to seek Kourkouri's execution. Despite this, Meysam Pirfalak publicly announced that Kourkouri is innocent and that he is not pursuing qisas-i nafs.

379 Samaneh Ghadarkhan, *Tahdīd Mādari Kiyān Bi Qatli Hamsar Va* Farzand Khurdsālash [Threatening Kian's Mother with the Murder of Her Husband and Young Child], IranWire (June 11, 2023), https://iranwire.com/fa/ features/117422-%D8%AA%D9%87%D8%AF%DB%8C%D8%AF-.

380 Slain Kian Pirfalak's Relative Killed by Agents on Kian's Birthday, IranWire (June 12, 2023), https://iranwire.com/en/news/117439-slain-kianpirfalaks-relative-killed-by-agents-on-kians-birthday/.

381 Şafhih Instāgiram Mādati Kīyān Pīrfalak Az Dastras Khārij Shud [The Instagram Page of Kian Pirflek's Mother Was Removed], IranWire (June 18, 2023), https://iranwire.com/fa/news-1/117656-%D8%B5%D9%81%D8%AD%D9%87-.



[L-R] Daniel Shahbakhsh (11), Amir Mohammad Rakhshani (15), Mohammad Eqbal Shahnavazi, also known as Nayeb Zehi (17)



[L-R] Omid Safarzehi (16), Javad Pusheh (12), Sadis Keshani (14)



[L-R] Omid Narouei (16), Adel Kuchakzaei, also known as Barichi (15), Yaser Bahadorzehi (17)



[L-R] Omid Sarani (13), Samer Hashem Zehi (16), Mubin Mirkazehi (14)

³⁷⁷ Pidari Kīyān Pīrfalak: Hīch Shīkāyatī Az Mujāhid Kūrkūrī Nadāram, Chirā Ki Nīrū Hāay Amnīyatī Mā Rā Bi Ragbār Bastand [Kian Pirfalak's Father: I Have No Complaint Against Mujahid Kurkuri, Because Security Forces Shot at Us], BBC Persian (Apr. 11, 2023), https://www.bbc.com/persian/ articles/c724y0w1ddqo.

³⁸² *Slain Child's Mother Under House Arrest*, IranWire (June 15, 2023), https://iranwire.com/en/news/117553-slain-childs-mother-under-house-arrest/.

Sistan and Baluchistan Province in southeastern Iran, a historically marginalized region with a Sunni-majority population, has long faced religious and ideological discrimination by the Islamic Republic. Due to intense security pressure, widespread poverty, and limited access to basic necessities, reporting, fact-checking, and documenting state-committed human rights abuses have been consistently challenging.

On September 30, 2022, during what is now referred to as "Bloody Friday," a protest following Friday prayers escalated into a massacre in which security forces killed over a hundred civilians, including fifteen children.³⁸³ Among the youngest victims was 7-year-old Hasti Narouei, who died inside the Great Mosalla, a place of worship, after being struck in the head by a tear gas canister.³⁸⁴ Her family was pressured to remain silent about the true cause of her death.³⁸⁵ State media even broadcast a video allegedly showing her father, who claimed that she died from being trampled in a crowd.³⁸⁶ Fourteen young boys were also killed that day, most of whom were shot in the head and chest with live ammunition. Two teenage boys were also shot and killed following protests after Friday prayers in Zahedan on October 2, while two others were fatally shot under similar circumstances after Friday prayers in Khash on November 4. Some of these children had left school to work and support their families or because they lacked identification documents, and in some instances, both.³⁸⁷ The poverty in the region has been so extreme that at least one family was reportedly unable to afford a gravestone for their teenage son who was killed on September 30.388

A martial court has reportedly indicted several low-ranking law enforcement personnel in connection with the events of September 30. However, only eleven individuals have been specifically charged with shootings that resulted in murder and injury.³⁸⁹ It appears that the pattern of impunity may continue, allowing those responsible for these crimes to evade accountability once again. State officials have also attempted to distort the events by blaming terrorists and separatist groups for the violence, and in at least one instance, they tried to silence a grieving family by offering the official designation of martyr (Shahid).390

In the chaotic aftermath of the September 30 massacre, many wounded individuals reportedly refused to seek medical care at hospitals due to fear of arrest and persecution. Some of these individuals later died at home, with no official record of their deaths, and were buried privately. Many of the deceased, including at least four of the children, lacked identification documents.³⁹¹ Consequently, the lives and deaths of these victims have not been officially documented. In several cases, despite extensive efforts, no photographs, grave markers, or records of the killed children have been found. Additionally, the killed individuals, including children, have been recorded in various sources under different names-sometimes by their family names and other times by their tribal names-complicating the fact-checking process. Furthermore, the families of some of the killed children, due to intimidation by state officials, have not yet been able to share their accounts of the events. These

³⁸³ IHRDC data and analysis (on file with IHRDC). This information is not publicly available yet.

³⁸⁴ E'tirāz Hāay Irān: Bī Bī Cī Kushti Sudigān Bīshtarī Az E'tirāzāt Irān Rā Shināsāyī Kardih Ast [Iran Protests: BBC Has Identified More Killed Citizens in Iran Protests], BBC Persian (Dec. 7, 2022), https://www.bbc.com/persian/ iran-features-63885726.

³⁸⁵ Hastī Nārūyī (Hasti Naroui), Tavaana, https://tavaana.org/hasti_ narouyi/ (last visited Aug. 28, 2024).

³⁸⁶ Margi Hastī Nārūyī Chigūnih Rukh Dād? Pidarash Hamih Chīz Rā Lū Dād + Fīlm [How Did the Death of Hasti Naroei Happen? Her Father Revealed Everything + Video], Rokna (Nov. 27, 2022), https://www.rokna. net/%D8%A8%D8%AE%D8%B4-%D8%AD%D8%A7%D8%AF%D8%AB %D9%87-245/847221-.

³⁸⁷ IHRDC data and analysis (on file with IHRDC). This information is not publicly available yet.

³⁸⁸ Shahīd "Javīd Pūshi," Yīkī Az Kuchaktarīn Shuhadāyi Khīzish Zan, Zindigī, Āzādī [Martyr "Javad Pusheh," One of the Youngest Martyrs of the of Woman, Life, Freedom Movement], Rasanknews (Sept. 11, 2023), https:// rasanknews.com/2023/09/11/%D8%B4%D9%87%DB%8C%D8%AF-%D8%AC%D9%88%D8%A7%D8%AF-.

³⁸⁹ Kīfar Khāst Barāyī 26 Mutaham Jum'ih Khunīn Zāhidān; Tanhā Etihām 11 Nafar Tīrandāzī Munjar Bi Qatl Ast [The Indictment for 26 Accused of Bloody Friday in Zahedan; Only 11 Individuals Were Charged with the Shooting Leading to Murder], Iran International (May 11, 2023), https:// www.iranintl.com/202305114071.

³⁹⁰ Avali MiR Yīk Sāl Pas Az Kūdak Kūshī Dar Irān [First of [Month of] Mehr, One Year After Killing Children in Iran], IranWire (Sept. 24, 2024), https://iranwire.com/fa/features/120840.

³⁹¹ IHRDC data and analysis (on file with IHRDC). This information is not publicly available yet.

challenges have made the verification process difficult, which is why the identities of three adolescents were only confirmed months after their deaths, with many details about the circumstances of their deaths still missing.

VI. Conclusion

This report demonstrates multiple human rights violations committed by Iranian security forces during the first two months of the Woman, Life, Freedom protest movement and rampant information suppression carried out by the Islamic Republic of Iran. The 12 case studies presented here draw on open source information to show what happened to just a small number of the people killed by security forces during the protests. All of them suffered multiple human rights violations including violations of the right to freedom of assembly and association,³⁹² freedom of expression,³⁹³ gender persecution,³⁹⁴ arbitrary detention,³⁹⁵ and extrajudicial killings by security forces.³⁹⁶ Many of the case studies show enforced disappearances took place, with all three requirements of (1) deprivation against the will of the person; (2) involvement of government officials, at least by acquiescence; and (3) refusal to acknowledge the deprivation of liberty or concealment of the fate or whereabouts of the disappeared person.³⁹⁷ In all cases their family members were pressured by the authorities to conceal the true nature of what happened to them. This mirrors the pattern of information suppression that has been enacted by the Islamic Republic from the early days of the regime - an added injury to families already mourning loved ones.

Disappearances, Best Practices on Enforced Disappearances in Domestic Criminal Legislation, ¶ 21, U.N. Doc A/HRC/16/48/Add.3 (Dec. 28, 2010).

³⁹² G.A. Res. 217 (III) A, Universal Declaration of Human Rights, art 20 (Dec. 10, 1948); G.A. Res. 2200A (XXI), International Covenant on Civil and Political Rights, art 21, art 22 (Dec. 16, 1966).; *See also* U.N. Office of the High Commissioner for Human Rights, Ratification Status for Iran (Islamic Republic of), https://tbinternet.ohchr.org/_layouts/15/TreatyBodyExternal/ Treaty.aspx?CountryID=81&Lang=EN.

G.A. Res. 2200A (XXI), International Covenant on Civil and Political Rights, art 19, § 1, art 19, § 2 (Dec. 16, 1966).

³⁹⁴ — International Criminal Court, Policy on the Crime of Gender Persecution, § 4 (2022).

³⁹⁵ G.A. Res. 2200A (XXI), International Covenant on Civil and Political Rights, art 9, 9 1 (Dec. 16, 1966).

³⁹⁶ *Id.* art 6.

³⁹⁷ Rep. of the Working Group on Enforced or Involuntary

VII. Acknowledgements

A. About the Iran Digital Archive Coalition

This report was drafted in support of and with input from an international research coalition that was formed to document, forensically preserve, and bring additional attention to evidence of potential human rights violations committed by the Islamic Republic of Iran against Woman, Life, Freedom movement protestors following the death of Mahsa Jina Amini in September 2022. The Coalition is led by the Atlantic Council's Strategic Litigation Project and Mnemonic, in partnership with The Digital Investigations Lab at UCLA Law, UC Berkeley's Human Rights Center, Amnesty International's Digital Verification Corps, the Iran Human Rights Documentation Center and the Azadi Archive. The Iranian Archive was launched by the Coalition in March 2024 to support future investigations and accountability proceedings. Housed by Mnemonic, the Iranian Archive joins other standalone archives created to support international investigations into alleged atrocities in Syria, Yemen, Sudan, and Ukraine. Evidence collected by the Coalition includes information related to the blinding of protesters; forced disappearances and deaths of children; and targeted abuse based on gender, ethnicity, religion and sexual orientation; among other violations. This report is the first in a series that will be published by Coalition partners.

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C. With Thanks

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