



## **Indictment of Hamid Noury**

### **English Translation**

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[Translation from Swedish into English]

[Crest]

THE SWEDISH PROSECUTION AUTHORITY  
National Public Prosecution Department –  
National Unit against Organised Crime  
Kristina Lindhoff Carleson, Public Prosecutor

**Application for a summons** Page 1(44)

Document 683

27 July 2021

Matter AM-150848-19

Case officer 860-M13

Please quote these details when contacting the authority

Stockholm District Court  
Department 4,  
Box 8307  
104 20 STOCKHOLM

[A stamp indicating:]  
STOCKHOLM DISTRICT COURT  
Department 4

RECEIVED: 27 July 2021  
CASE NO.: B 15255-19  
FILE APP.: 389

District Court case: B 15255-19  
Act: VIOLENCE

<b>1</b>	Accused, surname and all forenames		Given name	Profession/title
	<b>Noury, Hamid</b>		[Blank]	[Blank]
	Personal identity (ID) no.	Citizen of	Telephone	Need for interpreter
	DOB 29 April 1961	Iran	[Blank]	Farsi
	Address			
Public defence counsel/representative				
Marcus, Daniel, Stockholms Advokatteam AB, Wennerbergsgatan 10, 5 <sup>th</sup> floor, 112 58 STOCKHOLM				
Tomas Söderqvist, Kruström Advokatbyrå KB, Box 7184, 103 88 STOCKHOLM				
Deprivation of liberty, etc.				
Arrested in his absence on 8 November 2019, Apprehended on 9 November 2019, Detained on 13 November 2019.				
Information on service				
[Blank]				

**The indictments [Allegations of liability], etc.**

## **1. CRIMES UNDER INTERNATIONAL LAW, GRAVE CRIME (5000-K1391829-19)**

*Aggrieved parties represented by Göran Hjalmarsson (Attorney)*

Iraj Mesdaghi  
Masoud Ashraf Semnani  
Mehdi Barjasteh Garmroodi  
Homayoun Kaviyani  
Mohsen Eshaghi  
Siamak Naderi  
Najafi Aria Fereydoun  
Ahmad Ebrahimi  
Reza Fallahi  
Akbar Samadi  
Mahmoud Royaie

*Aggrieved parties represented by Bengt Hesselberg (Attorney)*

Mehdi Eshaghi  
Ali Zolfaghari  
Majid Djamshidiat  
Hassan Golzari  
Ramezan Fathi  
Hamid Nejati Khalagh dust

*Aggrieved parties represented by Ghita Hadding Wiberg (Attorney)*

Nasrullah Marandi  
Asghar Mehdizadeh  
Majid Saheb Jam Atabaki  
Hossein Farsy  
Mokhtar Borojerdy Shalavand  
Mahnaz Meimanat  
Mehri Haji-Nejad  
Seyyed Jafar Mir-Mohammadi Berenjestanaki

*Aggrieved parties represented by private representative Kenneth Lewis (Attorney)*

Aliakbar Bandali  
Mohammed Zand  
Khadijeh Borhani  
Hossein Seyed Ahmadi

**DESCRIPTION OF THE CRIMINAL ACT**

An international armed conflict prevailed between Iran and Iraq between 1981 and 1988. Iran was attacked on several occasions during the final phase of the armed conflict, among others, on 26 July 1988 by an armed branch of the political organisation, the People's Mojahedin Organisation of Iran ('Mojahedin'), in which connection Mojahedin became part of the international armed conflict. These attacks came from Iraqi territory and were supported by and in cooperation with the Iraqi army.

In the event that Mojahedin's actions according to the first paragraph were not deemed to be part of the international armed conflict between Iran and Iraq during the spring/summer of 1988, there was, alongside the conflict between Iran and Iraq, a non-international armed conflict between the state of Iran and Mojahedin.

Iran's Supreme Leader, Ayatollah Khomeini, issued shortly thereafter, principally as a result of the attack on 26 July 1988, a fatwa/order that all prisoners in the

Iranian prisons who belonged to/sympathised with Mojahedin and who were faithful/loyal in their convictions should be executed.

Mass executions of supporters/sympathisers of Mojahedin, who were prisoners in the Iranian prisons, started immediately afterwards.

Hamid Noury, in his capacity as assistant to the deputy prosecutor or in some other similar position/role at Gohardasht Prison (Rajaei Shahr) in Karaj in Iran during the period 30 July 1988 to 16 August 1988, jointly and in collusion/consultation with other perpetrators, intentionally took the lives of a very large number of prisoners who belonged to/sympathised with Mojahedin (including those persons listed in Appendix A).

Hamid Noury's participation in the executions comprised him, jointly and in collusion/consultation with others, organising and participating in the executions by, among other things, selecting which prisoners should appear before a quasi-judicial commission ('the Committee'), which had a mandate according to the fatwa/order to decide which prisoners were to be executed, taking these prisoners to the 'corridor of death' and guarding them there, reading out the names of those prisoners who were to be taken into the Committee, taking the prisoners to the Committee, providing written/verbal information about the prisoners to the Committee, reading out the names of those prisoners who were to be taken for execution, ordering the prisoners to stand in line to be escorted to the place of execution and also escorting prisoners there, after which the prisoners' lives were taken through hanging. Hamid Noury was also himself present at and participated in these executions on one or more occasions.

Hamid Noury has also, in his capacity as assistant to the deputy prosecutor or in some other similar position/role at Gohardasht Prison, jointly and in collusion/consultation with other high-ranking employees, urged and ordered other perpetrators to participate in the executions by assisting him and other high-ranking employees in the actions referred to above and also carrying out the executions.

In any event, Hamid Noury, jointly and in collusion/consultation with other perpetrators through the above-mentioned procedure, enforced the death penalties imposed by the Committee, which were issued following a procedure that did not satisfy the fundamental requirements for a fair trial ensuing from international humanitarian law.

Furthermore, Hamid Noury, in his capacity as assistant to the deputy prosecutor or in some other similar position/role, during the same period and at the same location, jointly and in collusion/consultation with other perpetrators, subjected a large number of prisoners who belonged to/sympathised with Mojahedin (including those persons listed in Appendices A and B) to severe suffering.

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This was done through inflicting on prisoners a severe death anxiety, which is to be assessed as torture and inhuman treatment, by taking the prisoners to the Committee and/or taking them to the ‘corridor of death’ pending being taken to the Committee and/or awaiting a decision of the Committee and also, for those selected, taking them to the place of execution and taking measures in preparation for execution.

Hamid Noury’s participation in the torture and inhuman treatment comprised him, jointly and in collusion/consultation with others, selecting those prisoners who would appear before the Committee, which would decide which prisoners were to be executed, taking these prisoners to the ‘corridor of death’, ordering the prisoners to sit there and wait, often for several hours, guarding them, reading out the names of those who were to be taken into the Committee and taking them into the Committee, reading out the names of the prisoners who were to be taken to the place of execution, ordering the prisoners to stand in line to be escorted to the place of execution and also escorting the prisoners there.

Hamid Noury has also, in his capacity as assistant to the deputy prosecutor or in some other similar position/role at Gohardasht Prison, jointly and in collusion/consultation with other high-ranking employees, urged and ordered other perpetrators to participate in the torture and inhuman treatment by assisting him and other high-ranking employees in their actions as described in the preceding paragraph.

In any event, it is asserted that Hamid Noury is to be regarded as an accomplice as he, through all of the above-mentioned criminal acts, furthered the intentional killing together with the torture and inhuman treatment by word and deed.

In the first instance, it is asserted that the criminal acts were committed as part of or were otherwise linked to the international armed conflict between Iran and Iraq.

Hamid Noury has thereby, through the said criminal acts targeted at civilians who enjoy special protection under Geneva Convention IV or generally recognised fundamental principles of international humanitarian law, committed a serious violation of Article 147 of Geneva Convention IV compared with Article 75 and Article 85 of Additional Protocol I and also of the generally recognised fundamental principles of international humanitarian law.

In the second instance, it is asserted that the criminal acts were committed as part of or otherwise linked to a non-international armed conflict between Iran and Mojahedin.

Hamid Noury has thus committed through the said criminal acts a serious violation of Common Article 3 of Geneva Convention IV and also of generally recognised fundamental principles of international humanitarian law.

This crime under international law is to be assessed as grave as a very large number of persons were executed, tortured and subjected to inhuman treatment in particularly cruel forms.

*Statutory provision*

Chapter 22, Section 6, paragraph 1 and paragraph 2 of the Swedish Criminal Code as worded prior to 1 July 1995, Article 147 of Geneva Convention IV compared with Articles 1, 72, 75 and also Article 85 of Additional Protocol I, in the second instance Article 3 of Geneva Convention IV, or alternatively as regards the killing, Chapter 3, Section 1 of the Swedish Criminal Code as worded prior to 1 July 2009.

## **2. MURDER (5000-K1391829-19)**

*Aggrieved parties represented by Göran Hjalmarsson (Attorney)*

Sara Rouzdar  
Sahra Nikoo

*Aggrieved parties represented by Bengt Hesselberg (Attorney)*

Sedigheh Haji Mohsen  
Vida Rostamalipour  
Laleh Bazargan  
Solmaz Alizadeh

*Aggrieved party represented by Ghita Hadding Wiberg (Attorney)*

Esmat Talebi Kalhoran

## **DESCRIPTION OF THE CRIMINAL ACT**

The religious/political leadership in Iran decided at some time prior to 27 August 1988 that other political prisoners in Iranian prisons, who sympathised with various groups on the left and who were not Muslim believers/were considered to have renounced their Islamic faith, should also be executed.

Hamid Noury, in his capacity as assistant to the deputy prosecutor or in some other similar position/role at Gohardasht Prison (Rajaei Shahr) in Karaj in Iran, during the period 27 August 1988 to 6 September 1988, jointly and in collusion/consultation with other perpetrators, intentionally took the lives of a very large number of

prisoners whose ideological/religious convictions were contrary to the theocratic state of Iran (including those persons listed in Appendix C).

Hamid Noury's participation in the executions comprised him, jointly and in collusion/consultation with others, organising and participating in the executions by, among other things, selecting which prisoners were to appear before a quasi-judicial commission ('the Committee'), which would decide which prisoners were to be executed, taking these prisoners to the 'corridor of death' and guarding them there, reading out the names of those prisoners who were to be taken into the Committee, taking the prisoners into the Committee, providing written/verbal information about the prisoners to the Committee, reading out the names of those prisoners who were to be taken for execution, ordering the prisoners to stand in line to be escorted to the place of execution and also escorting prisoners there, after which the prisoners' lives were taken through hanging.

Hamid Noury has also, in his capacity as assistant to the deputy prosecutor or in some other similar position/role at Gohardasht Prison, jointly and in collusion/consultation with other high-ranking employees, urged and ordered other perpetrators to participate in the executions by assisting him and other high-ranking employees in their actions as referred to above and also carrying out the executions.

In any event, Hamid Noury, jointly and in collusion/consultation with other perpetrators through the above-mentioned procedure, enforced the death penalties imposed by the Committee, following a procedure that did not satisfy the fundamentals requirements for a fair trial.

In the second instance, it is asserted that Hamid Noury is to be regarded as an accomplice as he, through the above-mentioned criminal acts, furthered murder by word and deed.

*Statutory provision*

Chapter 3, Section 1 of the Swedish Criminal Code as worded prior to 1 July 2009.

*Special applications*

1. It is requested that the seizure of Hamid Noury's mobile phone shall continue to apply until the judgment has entered into final legal force and then be revoked. (Seizure number 2019- 5000-Bg123625, item 1)
2. It is requested that Hamid Noury be expelled from Sweden, with a prohibition on return in accordance with Chapter 8 a, Section 1 of the Aliens Act (2005:716)

## **Appendix A**

1. Mehrdad Ashtari
2. Shahram Shahbakhshi
3. Reza Abbasi
4. Masoud Kabari
5. Hamzeh Shalalvand Borojerdy
6. Mahmoud Meimanat
7. Ali Haji Nejad
8. Saied Mohammad Hussein Borhani
9. Seyyed Agil MirMohammadi Berenjestanaki
10. Mohsen Seyyed Ahmadi
11. Ramin Ghasemi
12. Seyed Hossein Sobhani
13. Reza Zand
14. Mehran Hoveida
15. Asghar Masjedi
16. Manouchehr Bozorgbashar
17. Behnam Tabani
18. Farzin Nosrati
19. Alireza Mehdizadeh
20. Hamidreza Taherian
21. Behzan Fath Zanjani
22. Abbas Afghan
23. Behrooz Behnamzadeh
24. Faramarz Delkash
25. Naser Barzegar
26. Alireza Sepasi
27. Mohammadreza Shahir Eftekhari
28. Reza Falanik,
29. Jalal Layeghi
30. Akbar Shakeri
31. Naser Mansouri
32. Abbas Yeganeh
33. Mohammadreza Mohajeri
34. Mahmoud Zaki
35. Asadollah Tayebi
36. Hadi Azizi
37. Mohammadhasan Khaleghi
38. Taher Haghighat Talab
39. Nemat Eghbali,
40. Jafar Tajaddod
41. Manouchehr Rezaie Jahromi
42. Majid Moshref



43. Roshan Bolbolian
44. Dariush Hanifehpour
45. Hossein Niakan
46. Ebrahim Akbarisefat
47. Abolghasem Arzhangi
48. Kaveh Nasari
49. Zafar Jafari Afshar
50. Gholam Reza Kiakojsori
51. Hadi Saberi
52. Mansour Ghahremani
53. Hossein Haghghatgoo
54. Mahshid Razaghi
55. Kheirollah Jalali
56. Mohammad Reza Hejazi
57. Behrooz Shahi Moghani
58. Ahmad Nouramin
59. Hossein Bahri
60. Farhad Atrak
61. Mohsen Rouzbahani
62. Hossein Abdolvahab
63. Hamid Ardestani
64. Mahmoud Armin
65. Iraj Jafarzadeh
66. Hadi Jalaloldin Farahani
67. Mansour Hariri
68. Saeed Ramezanloo
69. Naser Zaringhalam
70. Masoud Daliri
71. Shahriar Feizi
72. Seyed Mohammad Akhlaghi
73. Amir Hossein Karimi
74. Iraj Lashgari
75. Mohammadreza Deljoy Sabetraftar
76. Zeidollah Nourmohammadi
77. Hamidreza Hemmati
78. Mohsen Sadeghzadeh Ardebili
79. Masoud Khastoo
80. Jafar Khosravi
81. Kumars Mirhadi
82. Mostafa Mardfard
83. Reza Azali
84. Mohammadali Elahi
85. Abdollah Behrangi
86. Davoud Hosseinkhani
87. Hosseinali Khatibi

88. Karim Khoshafkar
89. Heidar Sadeghi
90. Ghasem Seifan
91. Faramarz Farahani
92. Ali Haghverdi
93. Hossein Ghazvini
94. Seyed Ali Vasli
95. Mohsen Mohammadbagher.
96. Ali Bakali
97. Ahmad Naalbandi
98. Mohammad Jangzadeh
99. Rahman Cheraghi
100. Mehdi Fereidooni
101. Mahmoud Abbasi
102. Afshin Alavi Tafreshi
103. Seyed Masih Ghoreyshi
104. Naser Saber Bechehmir
105. Ghasem Mohebali
106. Ahmed Beik Mohammadi
107. Bijan Keshavarz
108. Mohammad Darvishnouri
109. Faramarz Jamshidian
110. Mohammed Farmani

## **Appendix B**

1. Iraj Mesdaghi
2. Nasrullah Marandi
3. Masoud Ashraf Semnani
4. Mehdi Barjasteh Garmroodi
5. Homayoun Kaviyvani
6. Mehdi Eshaghi
7. Mohsen Eshaghi
8. Siamak Naderi
9. Ali Zolfaghari
10. Najafi Aria Fereydoun
11. Majid Djamshidiat
12. Hassan Golzari
13. Aliakbar Bandali
14. Ahmad Ebrahimi
15. Reza Fallahi
16. Ramezan Fathi
17. Ashgar Mehdizadeh
18. Majid Saheb Jam Atabaki
19. Hossein Farsy
20. Mohammed Zand
21. Akbar Samadi
22. Mahmoud Royaie
23. Hamid Nejati Khalagh dust

## **Appendix C**

1. Adel Rouzdar
2. Hosein Haji Mohsen
3. Adel Talebi
4. Heidar Nikoo
5. Majid Ivani
6. Bijan Bazargan
7. Mahmoud Alizadeh Azami
8. Jahanbakhsh Sarkhosh
9. Mahmoud Ghazi
10. Kayvan Mostafavi
11. Mohsen Rajabzadeh
12. Abbas Raiisi
13. Jafar Rihai
14. Sadek Riahi
15. Mohammad Ali Pezhman
16. Mostafa Farhadi
17. Homoiyon Azadi
18. Madjid Walid
19. Behzad Omrani
20. Mohamed Ali Behkish
21. Mahmoud Behkish
22. Ebrahim Najaran
23. Hamid Nasiri
24. Mohsen Delijani
25. Sasan Ghandi
26. Anusheh Taheri

## EVIDENCE

*All to prove that Hamid Noury committed a crime under international law, a grave crime and murder at Gohardasht Prison (Rajaei Shahr) in Karaj in Iran from 30 July to 6 September 1988.*

### *Verbal evidence*

Questioning with Hamid Noury

### Aggrieved parties

1. Aggrieved party questioning with **Iraj Mesdaghi** regarding his experiences and observations at Gohardasht Prison during the period 1986 to 1989 and at Evin sometime thereafter, the reason for him being imprisoned, and also his work with documenting and communicating his experiences during the mass executions, *to prove that Iraj Mesdaghi was sentenced for having sympathised with Mojahedin, that the mass executions of prisoners at Gohardasht Prison were ongoing between 30 July and 16 August 1988 (8 to 25 Mordad 1367) and also from 27 August to 6 September 1988 (5 to 13 Shahrivar 1367), that the person who went under the name of Hamid Abbasi at Gohardasht Prison is Hamid Noury, that Hamid Noury participated in the mass executions of prisoners at Gohardasht Prison, that Hamid Noury worked as a representative of the prosecutors at Gohardasht, that Hamid Noury had a leading position at the prison and also at the mass executions, that Iraj Mesdaghi was taken to the Committee on several occasions, that Hamid Noury was at the Death Committee on 30 July 1988 (8 Mordad 1367), that Hamid Noury took Iraj Mesdaghi from the Death Committee to the corridor of death on 6 August 1988 (15 Mordad 1367), that Hamid Noury called out the names of those prisoners who were to be taken to the place of execution and also took them there and ordered guards to take the prisoners to the place of execution, that Hamid Noury, jointly with other perpetrators, also ensured that prisoners were taken to the Death Committee and to the place of execution on 9, 12 and 13 August 1988 (18, 21 and 22 Mordad 1367) and also on 16 August 1988 (25 Mordad 1367), that a very large number of his fellow prisoners were executed during these days, including Naser Mansouri (A 31) and Mohsen Mohammad Bagher (A 95) who were executed on 6 August 1988 (15 Mordad 1367), that Kaveh Nasari (A 48) and Zafar Jafari Afshar (A 49) were executed on 13 August 1988 (22 Mordad 1367), that Mahmoud Zaki (A 34), Mansour Gharemani (A 52), Hossein Haghigatoo (A 53), Mashid Razaghi (A 54), Adel Talebi (C 3) and Mostafa Mardfard (A 82) were also executed, and also that Iraj Mesdaghi was subjected to severe suffering.* (Göran Hjalmarsson, Aggrieved Party Counsel)

2. Aggrieved party questioning with **Nasrullah Marandi** regarding his experiences and observations at Gohardasht Prison during the period 1987 to 1989 and also the reason for him being imprisoned, and also his observations of Hamid Noury at the office of the public prosecutor in Tehran in the mid-nineties, *to prove that Nasrullah Marandi was sentenced for having sympathised with Mojahedin, that mass executions of prisoners took place at Gohardasht during the period of the crimes in question, that the person who went under the name of Hamid Abbasi at Gohardasht Prison is Hamid Noury, that Hamid Noury participated in the mass executions of prisoners at Gohardasht Prison, that Hamid Noury had a leading position at the prison and also at the mass executions, that Hamid Noury, jointly with others, interviewed prisoners on 1 August 1988 (10 Mordad 1367), among others Nasrullah Marandi, to select those who were to be taken to the Death Committee, which subsequently resulted in Nasrullah Marandi appearing before the 'Death Committee' on 6 August 1988 (15 Mordad 1367), that Hamid Noury came to his unit with a list on several occasions during the mass executions and called out the names of persons who were to be taken to the Death Committee, that Hamid Noury read out the names of persons on 6 August 1988 (15 Mordad 1367) who were to be taken to the place of execution and also took these prisoners there, that, among others, Ali Hagverdi (A 92), Seyed Ali Vasli (A 94), Hossein Ghazvini (A 93), Ghasem Seifan (A 90) were executed on 6 August 1988 (15 Mordad 1367), that Gholam Reza Kiakojsori (A 50) was executed on 16 August 1988 (25 Mordad 1367), and also that Nasrullah Marandi was subjected to severe suffering.* (Ghita Hadding Wiberg, Aggrieved Party Counsel)
  
3. Aggrieved party questioning with **Masoud Ashraf Semnani** regarding his experiences and observations at Gohardasht Prison from 1988 to 1989 and at Evin after the executions, and also the reason for him being imprisoned, *to prove that Masoud Ashraf Semnani was sentenced for having sympathised with Mojahedin, that the mass executions of prisoners took place at Gohardasht, that the execution period for Mojahedin supporters was between 30 July and 16 August 1988 [sic 1988](8 to 25 Mordad 1367) and for left-wing prisoners from 27 August 1988 (5 Shahrivar), that the person who went under the name of Hamid Abbasi at Gohardasht Prison is Hamid Noury, that Hamid Noury participated in the mass executions of prisoners at Gohardasht, that Hamid Noury had a leading position at the prison and also during the mass executions, that Masoud Ashraf Semnani was at the Death Committee on two occasions on 9 and 12 August 1988 (18 and 21 Mordad 1367) and also that he saw Hamid Noury on those days and that he then saw Hamid Noury taking prisoners into the Committee (9 Mordad) and reading out the names of prisoners who were to be sent to the place of execution (9 and 12 Mordad), that Hamid Noury on one occasion took prisoners to the place of execution, and also that Masoud Ashraf Semnani was subjected to severe suffering.* (Göran Hjalmarsson, Aggrieved Party Counsel)

4. Aggrieved party questioning with **Mehdi Barjesteh Garmroodi** regarding his experiences and observations at Gohardasht Prison during the period 1986 to 1989 and at Evin after the executions, and also the reason for him being imprisoned, *to prove that Mehdi Barjesteh Garmroodi was sentenced for having sympathised with Mojahedin, that mass executions took place of prisoners at Gohardasht during the period of the crimes in question, that the person who went under the name of Hamid Abbasi at Gohardasht Prison is Hamid Noury, that Hamid Noury participated in the mass executions of prisoners at Gohardasht, that Hamid Noury had a leading position at the prison and also during the mass executions, that Hamid Noury was involved in and organised the executions of prisoners on 6 to 7 August 1988 (15 to 16 Mordad 1367) in conjunction with them appearing before the Committee and also in the corridor of death, that Hamid Noury was in the corridor of death on another occasion approximately two weeks later, that, among others, Hamzeh Shalalvand Borojerdy (A 5) was executed, and also that Mehdi Barjesteh Garmroodi was taken to the Committee and subjected to severe suffering.* (Göran Hjalmarsson, Aggrieved Party Counsel)
  
5. Aggrieved party questioning with **Homayoun Kaviyani** regarding his experiences and observations at Gohardasht Prison during the period 1987 to 1989 and after the executions at Evin, and also the reason for him being imprisoned, *to prove that Homayoun Kaviyani was sentenced for having sympathised with Mojahedin, that mass executions of prisoners took place at Gohardasht during the period of the crimes in question, that the person who went under the name of Hamid Abbasi at Gohardasht Prison is Hamid Noury, that Hamid Noury participated in the mass executions of prisoners at Gohardasht, that Hamid Noury had a leading position at Gohardasht, that Hamid Noury took prisoners to the Death Committee, that several of Homayoun Kaviyani's fellow prisoners were executed during these days, among others, Seyed Hossein Sobhani (A 12) and Mohammadali Elahi (A 84), and also that Homayoun Kaviyani was taken to the Committee and subjected to severe suffering.* (Göran Hjalmarsson, Aggrieved Party Counsel)
  
6. Aggrieved party questioning with **Mehdi Eshaghi** regarding his experiences and observations at Gohardasht Prison during the period 1987 to 1989 and at Evin some time after the executions, and also the reason for him being imprisoned, *to prove that Mehdi Eshaghi was sentenced for having sympathised with Mojahedin, that mass executions of prisoners took place at Gohardasht during the period of the crimes in question, that the person who went under the name of Hamid Abbasi at Gohardasht Prison is Hamid Noury, that Hamid Noury participated in the mass executions of prisoners at Gohardasht Prison, that*

*Hamid Noury had a leading position at Gohardasht, that Mehdi Eshaghi was taken to the Committee at the end of July/beginning of August (at the start of the month of Mordad) and that Hamid Noury was in the corridor of death at that time and controlled/guarded the prisoners, that Hamid Noury called out the names of prisoners who were to be taken to the Death Committee and took them into the courtroom, that, among others, Jafar Tajaddod (A 40) was executed, and also that Mehdi Eshaghi was subjected to severe suffering. (Bengt Hesselberg, Aggrieved Party Counsel)*

7. Aggrieved party questioning with **Mohsen Eshaghi** regarding his experiences and observations at Gohardasht Prison during the period 1986 to 1989 and at Evin Prison some time after the executions, and also the reason for him being imprisoned, *to prove that Mohsen Eshaghi was sentenced for having sympathised with Mojahedin, that mass executions of prisoners took place at Gohardasht during the period of the crimes in question, that the person who went under the name of Hamid Abbasi at Gohardasht Prison is Hamid Noury, that Hamid Noury participated in the mass executions of prisoners at Gohardasht, that Hamid Noury had a leading position at Gohardasht and during the mass executions, that Hamid Noury around 1 August 1988 (10 Mordad 1367) read out the names of persons who were to be taken to the 'Death Committee', took prisoners into the Committee and provided the Committee the files containing information about the prisoners, and also that Mohsen Eshaghi was taken to the Committee and subjected to severe suffering (Göran Hjalmarsson, Aggrieved Party Counsel)*
  
8. Aggrieved party questioning with **Siamak Naderi** regarding his experiences and observations at Evin in 1981 and at Gohardasht during the period 1987 to 1989, and also the reason for him being imprisoned, *to prove that Siamak Naderi was sentenced for having sympathised with Mojahedin, that mass executions of prisoners took place at Gohardasht during the period of the crimes in question, that the person who went under the name of Hamid Abbasi at Gohardasht Prison is Hamid Noury, that Hamid Noury participated in the mass executions of prisoners at Gohardasht, that Hamid Noury had a leading position at Gohardasht, that Hamid Noury was present on the day on which Siamak Naderi was taken to the Death Committee, that Hamid Noury collected prisoners from Siamak Naderi's unit who were taken to the Committee, among other times on 11 August 1988 (20 Mordad 1367), that, among others Behnam Tabani (A 17) was executed, and also that Siamak Naderi was subjected to severe suffering. (Göran Hjalmarsson, Aggrieved Party Counsel)*
  
9. Aggrieved party questioning with **Ali Zolfaghari** regarding his experiences and observations at Gohardasht Prison during the period 1986 to 1989, and also the



reason for him being imprisoned, *to prove that Ali Zolfaghari was sentenced for having sympathised with Mojahedin, that mass executions of prisoners at Gohardasht took place during the period of the crimes in question, that the person who went under the name of Hamid Abbasi at Gohardasht Prison is Hamid Noury, that Hamid Noury participated in the mass executions of prisoners at Gohardasht, that Hamid Noury had a leading position at Gohardasht and during the mass executions, that Hamid Noury on 31 July 1988 (9 Mordad 1367) first collected prisoners to take them to the Death Committee, second asked the prisoners questions before they were taken to the Committee, third took Ali Zolfaghari into the Committee, fourth called out the names of those who were to be executed, that Hamid Noury around 10 to 15 days later was once again in the corridor of death and then took away Behrooz Shahi Moghani (A 57) for him to be executed, that, among others, Amir Hossein Karimi (A 73), Farzin Nosrati (A 18), Masoud Khasto (A 79) and Mohsen Sadeghzadeh Ardebili (A 78) were executed, and also that Ali Zolfaghari was subjected to severe suffering. (Bengt Hesselberg, Aggrieved Party Counsel)*

10. Aggrieved party questioning with **Najafi Aria Fereydoun**, regarding his experiences and observations at Gohardasht Prison from 1988 to 1989 and a period prior to this, and also the reason for him being imprisoned, *to prove that Najafi Aria Fereydoun was sentenced for having sympathised with Mojahedin, that mass executions of prisoners at Gohardasht took place during the period of the crimes in question, that the person who went under the name of Hamid Abbasi at Gohardasht Prison is Hamid Noury, that Hamid Noury participated in the mass executions of prisoners at Gohardasht, that Hamid Noury had a leading position at Gohardasht and during the mass executions, that Hamid Noury was in the corridor of death in any event on two of the days when Najafi Aria Fereydoun was taken there, that Hamid Noury took prisoners into the Committee, that Hamid Noury conveyed information to the Committee regarding the prisoners, that, among others, Farzin Nosrati (A 18) and Zeidollah Nourmohammadi (A 76) were executed, and also that Najafi Aria Fereydoun [sic Fereydoun] was subjected to severe suffering. (Göran Hjalmarsson, Aggrieved Party Counsel)*
  
11. Aggrieved party questioning with **Majid Djamshidiat** regarding his experiences and observations at Gohardasht Prison during the period 1986/1987 to 1989, at Evin in 1983 and after the executions both at Evin Prison and outside the prison, and also the reason for him being imprisoned, *to prove that Majid Djamshidiat was sentenced for having sympathised with Mojahedin, that mass executions of prisoners at Gohardasht took place during the period of the crimes in question, that the person who went under the name*

*of Hamid Abbasi at Gohardasht Prison is Hamid Noury, that Hamid Noury participated in the mass executions of prisoners at Gohardasht, that Hamid Noury had a leading position during the mass executions, that Hamid Noury at some time between 1 and 3 August 1988 (10 to 12 Mordad 1367) took Majid Djamshidiat into the Death Committee, that Hamid Noury participated in the interrogation of prisoners for the purpose of selecting those prisoners who were to be taken to the Death Committee, that Ramin Ghasemi (A 11) was executed, and also that Majid Djamshidiat was subjected to severe suffering. (Bengt Hesselberg, Aggrieved Party Counsel)*

12. Aggrieved party questioning with **Hassan Golzari** regarding his experiences and observations at Gohardasht Prison during the period 1986/1987 to 1989, and also the reason for him being imprisoned, *to prove that Hassan Golzari was sentenced for having sympathised with Mojahedin, that mass executions of prisoners at Gohardasht Prison took place during the period of the crimes in question, that the person who went under the name of Hamid Abbasi at Gohardasht Prison is Hamid Noury, that Hamid Noury participated in the mass executions of prisoners at Gohardasht, that Hamid Noury had a leading position at Gohardasht, that Hamid Noury on 1 August 1988 (10 Mordad 1367) collected prisoners, among others Hassan Golzari, in order to take them to the Death Committee, that, among others, Mohammed Farmani (A 110) was executed, and also that Hassan Golzari was subjected to severe suffering. (Bengt Hesselberg, Aggrieved Party Counsel)*
  
13. Aggrieved party questioning with **Aliakbar Bandali** regarding his experiences and observations at Gohardasht Prison from 1987 to 1989, and also the reason for him being imprisoned, *to prove that Aliakbar Bandali was sentenced for having sympathised with Mojahedin, that mass executions of prisoners at Gohardasht took place during the period of the crimes in question, that the person who went under the name of Hamid Abbasi at Gohardasht Prison is Hamid Noury, that Hamid Noury participated in the mass executions of prisoners at Gohardasht, that Hamid Noury collected Mohammad Farhani, who was later executed, that Hamid Noury was in the corridor of death on 16 August 1988 (25 Mordad 1367), that, among others, Mehran Hoveida (A 14), Mansour Gharemani (A 52) and Seyed Hossein Sobhani (A 12) were executed, and also that Aliakbar Bandali was taken to the Committee and subjected to severe suffering. (Kenneth Lewis, Private Representative)*
  
14. Aggrieved party questioning with **Ahmad Ebrahimi** regarding his experiences and observations at Gohardasht Prison from 1987 to 1989, and also the reason

for him being imprisoned, *to prove that Ahmad Ebrahimi was sentenced for having sympathised with Mojahedin, that mass executions of prisoners at Gohardasht took place during the period of the crimes in question, that the person who went under the name of Hamid Abbasi at Gohardasht Prison is Hamid Noury, that Hamid Noury participated in the mass executions of prisoners at Gohardasht, that Hamid Noury was in the corridor of death when Ahmad Ebrahimi was taken there around 9 August 1988 (18 Mordad 1367), that, among others, Abbas Yeghaneh (A 32), Naser Zaringhalam (A 69), Naser Saber Bechemir (A 104), Ghasem Moheballi (A 105), Mehdi Fereidooni (A 100) and Majid Moshref (A 42) were executed, and also that Ahmad Ebrahimi was subjected to severe suffering.* (Göran Hjalmarsson, Aggrieved Party Counsel)

15. Aggrieved party questioning with **Reza Fallahi** regarding his experiences and observations at Gohardasht Prison from 1987 to 1989, and also the reason for him being imprisoned, *to prove that Reza Fallahi was sentenced for having sympathised with Mojahedin, that mass executions of prisoners at Gohardasht took place during the period of the crimes in question, that the person who went under the name of Hamid Abbasi at Gohardasht Prison is Hamid Noury, that Hamid Noury participated in the mass executions of prisoners at Gohardasht, that Hamid Noury collected and interrogated the prisoners on 1 August 1988 (10 Mordad 1367), that Hamid Noury asked for the prisoners' names in the corridor of death and also took prisoners to the execution room on 3 August 1988 (12 Mordad 1367), that Behzan Fath Zanjani (A 21) and Mohsen Rouzbahani (A 61) were executed on 3 August 1988 (12 Mordad 1367), that Reza Fallahi saw Hamid Noury on several occasions during the period of the crimes in question, that, among others, Mohammed Farmani (A 110) and Abbas Afghan (A 22) were executed, and also that Reza Fallahi was taken to the Committee and subjected to severe suffering.* (Göran Hjalmarsson, Aggrieved Party Counsel)
  
16. Aggrieved party questioning with **Ramezan Fathi** regarding his experiences and observations at Gohardasht Prison during the period 1986 to 1989 and Evin around 1983, and also the reason for him being imprisoned, *to prove that Ramezan Fathi was sentenced for having sympathised with Mojahedin, that mass executions of prisoners at Gohardasht took place during the period of the crimes in question, that the person who went under the name of Hamid Abbasi at Gohardasht Prison is Hamid Noury, that Hamid Noury participated in the mass executions of prisoners at Gohardasht, that Hamid Noury had a leading position at Gohardasht, that Hamid Noury collected prisoners who were to be taken to the Death Committee, that Hamid Noury interviewed prisoners to select those who were to be taken to the Death Committee, that Hamid Noury*

*was at the executions at Gohardasht on 6 August 1988 (15 Mordad 1367), that Hamid Noury called out the names of those prisoners who were to be executed and took prisoners to the place of execution, that Hamid Noury was also at Gohardasht on 30 July 1988 (8 Mordad 1367) and on 5 August 1988 (14 Mordad 1367), that Hamid Noury was at the Death Committee on 16 August 1988 (25 Mordad 1367), that, among others, Naser Mansouri (A 31), Kaveh Nasari (A 48), Farhad Atrak (A 60), Seyed Ali Vasli (A 94) were executed on 6 August 1988 (15 Mordad 1367), that Ali Haghverdi (A 92) was executed, and also that Ramezan Fathi was taken to the Committee and subjected to severe suffering. (Bengt Hesselberg, Aggrieved Party Counsel)*

17. Aggrieved party questioning with **Asghar Mehdizadeh** regarding his experiences and observations at Gohardasht Prison from 1986 to 1989, and also the reason for him being imprisoned, *to prove that Asghar Mehdizadeh was sentenced for having sympathised with Mojahedin, that mass executions of prisoners at Gohardasht took place during the period of the crimes in question, that the person who went under the name of Hamid Abbasi at Gohardasht Prison is Hamid Noury, that Hamid Noury participated in the mass executions of prisoners at Gohardasht, that Hamid Noury had a leading position at Gohardasht and during the mass executions, that Hamid Noury handed over forms to, among others, Asghar Mehdizadeh on 31 July 1988 (9 Mordad 1367), that Hamid Noury collected prisoners on 1 August 1988 (10 Mordad 1367), among others Asghar Mehdizadeh, and took them to the corridor of death, that Hamid Noury called out names of prisoners on the same day and took prisoners to the place of execution, that Hamid Noury collected prisoners on 3 August 1988 (12 Mordad 1367) and 6 August 1988 (15 Mordad 1367) who were to be taken to the Death Committee, that Hamid Noury was in the execution room on 9 August 1988 (18 Mordad 1367) and kicked chairs away so that prisoners were hanged, and also that Asghar Mehdizadeh was subjected to severe suffering. (Ghita Hadding Wiberg, Aggrieved Party Counsel)*
  
18. Aggrieved party questioning with **Majid Saheb Jam Atabaki** regarding his experiences and observations at Gohardasht Prison from 1988 to 1989, at Evin before and after the executions and at the office of the public prosecutor in Tehran between 1992 and 1993, and also the reason for him being imprisoned, *to prove that Majid Saheb Jam Atabaki was sentenced for having sympathised with Mojahedin, that mass executions of prisoners at Gohardasht took place during the period of the crimes in question, that the person who went under the name of Hamid Abbasi at Gohardasht Prison is Hamid Noury, that Hamid Noury participated in the mass executions of prisoners at Gohardasht, that Hamid Noury on 6 and 13 August 1988 (15 and 22 Mordad 1367) called out the names of those prisoners who were to be taken for execution and took them*

*to the place of execution, that Mohsen Mohammadbagher (A 95) and Naser Mansouri (A 31) were executed on 6 August 1988 (15 Mordad 1367), that Dariush Hanifehpour (A 44), Ebrahim Akbarisefat (A 46), Abolghasem Arzhangi (A 47), Roshan Bolbolian (A 43), Bijan Keshavarz (A 107) and Hossein Niakan (A 45) were executed on 13 August 1988 ( 22 Mordad 1367), that, among others, Hadi Saberi (A 51), Gholam Reza Kiakojori (A 50) and Mohammadhasan Khaleghi (A 37) were also executed, and also that Majid Saheb Jam Atabaki was taken to the Committee and subjected to severe suffering. (Ghita Hadding Wiberg, Aggrieved Party Counsel)*

19. Aggrieved party questioning with **Hossein Farsy** regarding his experiences and observations at Gohardasht Prison from 1988 to 1989 and at Evin, and also the reason for him being imprisoned, *to prove that Hossein Farsy was sentenced for having sympathised with Mojahedin, that mass executions of prisoners at Gohardasht took place during the period of the crimes in question, that the person who went under the name of Hamid Abbasi at Gohardasht Prison is Hamid Noury, that Hamid Noury participated in the mass executions of prisoners at Gohardasht, that Hamid Noury took prisoners who were to be executed on 30 July and 9 August 1988 (8 and 18 Mordad 1367), that Hamid Noury called out names who were to be taken to the place of execution on 12 August 1988 (21 Mordad 1367), that Hamid Noury called out names and took prisoners to the place of execution on 13 August 1988 (22 Mordad 1367), that a large number of fellow prisoners, among others Mahmoud Meimanat (A 6), were executed, and also that Hossein Farsy was taken to the Committee and subjected to severe suffering. (Ghita Hadding Wiberg, Aggrieved Party Counsel)*
  
20. Aggrieved party questioning with **Mohammed Zand** regarding his experiences and observations at Gohardasht Prison from 1988 to 1989 and also for a period prior to this, at Evin after the executions and in Tehran during the winter of 1995, and also the reason for him being imprisoned, *to prove that Mohammed Zand was sentenced for having sympathised with Mojahedin, that mass executions of prisoners at Gohardasht took place during the period of the crimes in question, that the person who went under the name of Hamid Abbasi at Gohardasht Prison is Hamid Noury, that Hamid Noury participated in the mass executions of prisoners at Gohardasht, that Hamid Noury read out the names of prisoners who were to be executed on 6 and 9 August 1998 [sic 1988] (15 and 18 Mordad 1367), that Hamid Noury jointly with others on 13 or 14 August 1988 (22 or 23 Mordad 1367) came to Mohammed Zand's cell and threatened him with execution, that Mohammed Zand's brother Reza Zand (A 13), Ramin Ghasemi (A 11), Mehran Hoveida (A 14) and Seyed Hossein*

*Sobhani (A 12) were collected on 30 July 1988 (8 Mordad 1367) from the unit after which they were executed on 31 July (9 Mordad), that Naser Mansouri (A 31) was executed on 6 August (15 Mordad), that, among others, Dariush Hanifehpour (A 44) and Mahmoud Zaki (A 34) were executed, and also that Mohammed Zand was taken to the Committee and subjected to severe suffering. (Kenneth Lewis, Private Representative)*

21. Aggrieved party questioning with **Akbar Samadi** regarding his experiences and observations at Gohardasht Prison from 1988 to 1989, and also the reason for him being imprisoned, *to prove that Akbar Samadi was sentenced for having sympathised with Mojahedin, that mass executions of prisoners at Gohardasht took place during the period of the crimes in question, that the person who went under the name of Hamid Abbasi at Gohardasht Prison is Hamid Noury, that Hamid Noury participated in the mass executions of prisoners at Gohardasht, that Hamid Noury took Akbar Samadi into the Death Committee on 3, 9, 13 and 27 August 1988 (12, 18 and 22 Mordad and also 5 Shahrivar 1367), that Hamid Noury called out the names of prisoners who were to be taken to the place of execution on 6 August 1988 (15 Mordad 1367), that, among others Reza Zand (A 13), Seyed Hossein Sobhani (A 12), Taher Haghighat Talab (A 38), Alireza Sepasi (A 26), Faramarz Jamshidian (A 109) and Ebrahim Akbarisefat (A 46) were executed, that Roshan Bolbolian (A 43), Dariush Hanifehpour (A 44) and Mohammad Darvishnouri (A 108) were executed on 13 August 1988 (22 Mordad 1367), and also that Akbar Samadi was subjected to severe suffering. (Göran Hjalmarsson, Aggrieved Party Counsel)*
  
22. Aggrieved party questioning with **Mahmoud Royaie** regarding his experiences and observations at Gohardasht Prison from 1986 to 1989 and at Evin from 1989 to 1990 and also the reason for him being imprisoned, *to prove that Mahmoud Royaie was sentenced for having sympathised with Mojahedin, that mass executions of prisoners at Gohardasht took place during the period of the crimes in question, that the person who went under the name of Hamid Abbasi at Gohardasht Prison is Hamid Noury, that Hamid Noury participated in the mass executions of prisoners at Gohardasht, that Hamid Noury had a leading position at Gohardasht and during the mass executions, that Hamid Noury called out the names of those prisoners who were to be executed on 3 August 1988 (12 Mordad 1367), that Reza Zand (A 13), Seyed Hossein Sobhani (A 12), Asghar Masjedi (A 15), Mehran Hoveida (A 14) and Masoud Kabari (A 4) were collected from the unit on 30 July 1988 (8 Mordad 1367) and subsequently executed, that, among others, Mohamed Reza Hejazi (A 56) and Roshan Bolbolian (A 43) were executed, and also that Mahmoud Royaie was taken to the Committee and subjected to severe suffering. (Göran Hjalmarsson, Aggrieved Party Counsel)*

Aggrieved parties whose relatives were executed

1. Aggrieved party questioning with **Mokhtar Borojerdy Shalavand** regarding and *to prove that his brother Hamzeh Shalavand Borojerdy (A 5), who sympathised with Mojahedin, was executed at Gohardasht in conjunction with the mass executions in 1988* (Ghita Hadding Wiberg, Aggrieved Party Counsel)
2. Aggrieved party questioning with **Mahnaz Meimanat** regarding and *to prove that his brother Mahmoud Meimanat (A 6), who sympathised with Mojahedin, was executed at Gohardasht in conjunction with the mass executions.* (Ghita Hadding Wiberg, Aggrieved Party Counsel)
3. Aggrieved party questioning with **Mehri Haji-Nejad** regarding and *to prove that her brother Ali Haji Nejad (A 7), who sympathised with Mojahedin, was executed at Gohardasht in conjunction with the mass executions.* (Ghita Hadding Wiberg, Aggrieved Party Counsel)
4. Aggrieved party questioning with **Khadijeh Borhani** regarding and *to prove that her brother Saied Mohammad Hussein Borhani (A 8), who sympathised with Mojahedin, was executed at Gohardasht in conjunction with the mass executions.* (Kenneth Lewis, Private Representative)
5. Aggrieved party questioning with **Seyyed Jafar Mir-Mohammadi Berenjestanaki** regarding and *to prove that his brother Seyyed Agil Mir Mohammadi Berenjestanaki (A 9), who was sentenced for having sympathised with Mojahedin, was executed at Gohardasht in conjunction with the mass executions.* (Ghita Hadding Wiberg, Aggrieved Party Counsel)
6. Aggrieved party questioning with **Hossein Seyed Ahmadi** regarding and *to prove that his brother Mohsen Seyyed Ahmadi (A 10), who was sentenced owing to him having sympathised with Mojahedin, was executed at Gohardasht in conjunction with the mass executions.* (Kenneth Lewis, Private Representative)

7. Aggrieved party questioning with **Sara Rouzdar** regarding and *to prove that her brother Adel Rouzdar (C 1), who sympathised with the Tudeh Party, was executed at Gohardasht in conjunction with the mass executions.*  
(Göran Hjalmarsson, Aggrieved Party Counsel)
8. Aggrieved party questioning with **Sahra Nikoo** regarding and *to prove that her brother Heidar Nikoo (C 4), who sympathised with the Tudeh Party, was executed on 28 August 1988 (6 Shahrivar 1367) at Gohardasht during the mass executions and that her brother had been imprisoned at Gohardasht with Adel Rozdar.* (Göran Hjalmarsson, Aggrieved Party Counsel)
9. Aggrieved party questioning with **Sedigheh Haji Mohsen** regarding and *to prove that her brother Hosein Haji Mohsen (C 2), who was an atheist and/or left-wing supporter, was executed at Gohardasht on 27 August 1988 (5 Shahrivar 1367) during the mass executions.* (Bengt Hesselberg, Aggrieved Party Counsel)
10. Aggrieved party questioning with **Esmat Talebi Kalhoran** regarding and *to prove that her brother Adel Talebi (C 3), who sympathised with Rah-e Kargar (Workers Path), was executed at Gohardasht in conjunction with the mass executions.* (Ghita Hadding Wiberg, Aggrieved Party Counsel)
11. Aggrieved party questioning with **Vida Rostamalipour** regarding and *to prove that her husband Majid Ivani (C 5), who sympathised with Fedayeen, was executed at Gohardasht in conjunction with the mass executions.*  
(Bengt Hesselberg, Aggrieved Party Counsel)
12. Aggrieved party questioning with **Laleh Bazargan**, regarding and *to prove that her brother Bijan Bazargan (C 6), who sympathised with Etehadieh Komunistha (the Communist Union), was executed at Gohardasht in conjunction with the mass executions.* (Bengt Hesselberg, Aggrieved Party Counsel)
13. Aggrieved party questioning with **Solmaz Alizadeh** regarding and *to prove that her father Mahmoud Alizadeh Azami (C 7), who sympathised with Fedayeen, was executed at Gohardasht in conjunction with the mass executions.*  
(Bengt Hesselberg, Aggrieved Party Counsel)



## Witnesses

1. Witness questioning with **Rahmat Ali Karami** (Mojahedin) regarding his experiences and observations at Gohardasht Prison and at Evin during the period 1983, 1987 to 1991, *to prove the mass executions of prisoners at Gohardasht during the period of the crimes in question, that the person who went under the name of Hamid Abbasi at Gohardasht Prison is Hamid Noury, that Hamid Noury participated in the mass executions of prisoners at Gohardasht, that Hamid Noury had a leading position at Gohardasht, that Hamid Noury took prisoners to the Death Committee, that, among others, Hamzeh Shalavand Borojerdy (A 5), Ebrahim Akbarisefat (A 46), Akbar Shakeri (A 30), Dariush Hanifepour (A 44), Jalal Layeghi (A 29), Iraj Lashgari (A 74), Hadi Saberi (A 51), Reza Falanik (A 28), Hossein Niakan (A 45), Abolghasem Arzhangi (A 47), Mohsen Mohammadbagher (A 95), Gholam Reza Kiakojori (A 50), Mohammad Reza Deljoy (A 75), Ahmad Naalbandi (A 97), Jafar Tajaddod (A 40), Mohammad Jangzade (A 98), Majid Moshref (A 42), Rahman Cheraghi (A 99), Ali Bakali (A 96), Mahmud Abbasi (A 101), Manouchehr Rezaie (A 41), Afshin Alavi (A 101) and Nemat Eghbali (A 39) were executed.*
2. Witness questioning with **Manoochehr Eshaghi** (Mojahedin) regarding his experiences and observations at Gohardasht Prison during the period 1987 to 1989 and at Evin after the executions, *to prove the mass executions of prisoners at Gohardasht during the period of the crimes in question, that the person who went under the name of Hamid Abbasi at Gohardasht Prison is Hamid Noury, that Hamid Noury participated in the mass executions of prisoners at Gohardasht, that Hamid Noury had a leading position at Gohardasht, that Hamid Noury collected prisoners from the Jihad unit who were to be taken to the Death Committee, that, among others, Majid Moshref (A 42), Mehdi Fereidooni (A 100) and Ali Bakali (A 96) were executed.*
3. Witness questioning with **Hamid Ashtari** (Mojahedin) regarding his experiences and findings at Gohardasht Prison from 1987 to 1989, *to prove the mass executions of prisoners at Gohardasht during the period of the crimes in*

*question, that the person who went under the name of Hamid Abbasi at Gohardasht Prison is Hamid Noury, that Hamid Noury had a leading position at Gohardasht and that Hamid Noury was at Gohardasht during the period of the executions and participated in the mass executions.*

4. Witness questioning with **Hassan Ashrafian** (Mojahedin) regarding his experiences and observations at Gohardasht Prison from 1986 to 1989, *to prove the mass executions of prisoners at Gohardasht during the period of the crimes in question, that the person who went under the name of Hamid Abbasi at Gohardasht Prison is Hamid Noury, that Hamid Noury participated in the mass executions of prisoners at Gohardasht and that, among others, Mansour Ghahremani (A 52), Mahmoud Meimanat (A 6) were executed.*
  
5. Witness questioning with **Mohammad Khodabandehloee** (Mojahedin) regarding his experiences and observations at Gohardasht Prison from 1986 to 1988 and at Evin in 1988, *to prove the mass executions at prisons in Iran during the period of the crimes in question, that Hamid Abbasi worked at Gohardasht during the period that Mohammad Khodabandehloee was an internee there up until June 1988, that Hamid Abbasi participated in an assault whereby Mohammad Khodabandehloee lost the sight of one eye, and also that Hamid Abbasi came to Evin Prison some time in July/August 1988 to look for Mohammad Khodabandehloee.*
  
6. Witness questioning with **Reza Shemirani** (Mojahedin) regarding his experiences and observations at Evin Prison from 1987 to 1989, *to prove the mass executions at prisons in Iran during the period of the crimes in question, that the person who went under the name of Hamid Abbasi at Gohardasht Prison is Hamid Noury, that Hamid Noury participated in the mass executions at Gohardasht, and also that Hamid Noury came to Evin after the executions in conjunction with the prisoners who survived the executions at Gohardasht being taken there and also that he had a leading position at the prison.*
  
7. Witness questioning with **Mohsen Zadshir** (Mojahedin) regarding his experiences and observations at Gohardasht Prison from 1986 to 1989, *to prove the mass executions of prisoners at Gohardasht during the period of the crimes in question, that the person who went under the name of Hamid Abbasi at Gohardasht Prison is Hamid Noury, that Hamid Noury participated in the mass executions of prisoners at Gohardasht, that, among others, Ramin Ghasemi (A 11), Manouchehr Bozorgbasha (A 16), Ali Reza Sepasi (A 26), Mohsen Roosbahani (A 61), Naser Barzegar (A 25),*

*Mohammadreza Shahir Eftekhari (A 27), Seyed Mohammad Akhlagh (A 72), Abdollah Behrangi (A 85) were executed.*

8. Witness questioning with **Abdolreza Shahab Shokoohi** (Rah-e Kargar – Workers Path) regarding his experiences and observations at Gohardasht Prison from 1988 to 1989, *to prove the mass executions of prisoners at Gohardasht during the period of the crimes in question, that the person who went under the name of Hamid Abbasi at Gohardasht Prison is Hamid Noury, that Hamid Noury participated in the mass executions of prisoners at Gohardasht, that Hamid Noury, jointly with the guards, collected the television from the witness's unit at the end of July 1988 (the start of Mordad 1367), that Hamid Noury ordered guards to whip those prisoners who had survived after the second occasion on which the witness appeared before the Death Committee, and also that Hamid Noury said that if they did not learn to beg, they would be executed after three days, and also that, among others, Adel Talebi (C 1), Jafar Riahi (C 13) and Sadek Rihai (C 14), Mostafa Farhadi (C 16) were executed.*
9. Witness questioning with **Maleki Hossein** (Forqan Group) regarding his experiences and observations at Gohardasht Prison from 1988 to 1989 and also after the executions at Evin Prison, *to prove the mass executions of prisoners at Gohardasht Prison during the period of the crimes in question, that the person who went under the name of Hamid Abbasi at Gohardasht Prison is Hamid Noury, that Hamid Noury had a leading position at the prison, that Hamid Noury was at Gohardasht Prison during the period of the crimes, and also that Hamid Noury participated in the mass executions of prisoners at Gohardasht Prison and jointly with others selected which prisoners were to be taken to the Death Committee.*
10. Witness questioning with **Seyed Jalalaldin Saidi** (Rah-e Kargar – Workers Path) regarding his experiences and observations at Gohardasht Prison from 1986 to 1989, *to prove the mass executions of prisoners at Gohardasht during the period of the crimes in question, that the person who went under the name of Hamid Abbasi at Gohardasht Prison is Hamid Noury, that Hamid Noury had a leading position at Gohardasht, that Hamid Noury participated in the executions, and also that, among others, Ahmed Beik Mohammadi (A 106), Jafar Rihai (C 13), Sadek Riahi (C 14) were executed.*
11. Witness questioning with **Mehrdad Neshati Malekyans** (Fadaian Khalgh) regarding his experiences and findings at Gohardasht Prison from 1986 to 1989, *to prove the mass executions of prisoners at Gohardasht during the period of the crimes in question, that Mehrdad Neshati Malekyans heard*

*Hamid Abbasi's voice on 30 August 1988 (8 Shahrivar 1367) in conjunction with the prisoners being interrogated, among other things about doing a video interview, and also that, among others, Homoiyon Azadi (C 17), Jahanbackish Sarkhosh (C 8), Hamid Nasiri (C 23), Madjid Walid (C 18), Behzad Omrani (C 19) and Mohamed Ali Behkish (C 20) were executed.*

12. Witness questioning with **Abolghassem Soleiman Pour** (Vahdat-e Kommunisti) regarding his experiences and observations at Gohardasht Prison from 1987 to 1989 and at Evin in 1989, *to prove the mass executions of prisoners at Gohardasht during the period of the crimes in question, that the person who went under the name of Hamid Abbasi at Gohardasht Prison is Hamid Noury, that Hamid Noury participated in the mass executions of prisoners at Gohardasht, that Hamid Noury around 31 August 1988 (9 Shahrivar 1367) collected prisoners, among others Abolghassem Soleiman Pour, for them to be interviewed before being taken to the Death Committee, that Hamid Noury in conjunction with this whipped the prisoners, that Hamid Noury then took the prisoners to the corridor outside the Death Committee and also took them into the Committee, that Hamid Noury took prisoners to the place of execution, that Hamid Noury ordered a guard to administer a punishment of 60 lashings to which Abolghassem Soleiman Pour was sentenced by the Death Committee, and also that Hosein Haji Mohsen (C 2) was imprisoned at Gohardasht during the mass executions.*
13. Witness questioning with **Payvand Manouchehr** (Fedayeen) regarding his experiences and observations at Gohardasht Prison from 1986 to 1989 and at Evin before the executions, *to prove the mass executions of prisoners at Gohardasht during the period of the crimes in question, that the person who went under the name of Hamid Abbasi at Gohardasht Prison is Hamid Noury, that Hamid Noury participated in the mass executions of prisoners at Gohardasht, that Hamid Noury called out prisoners some time between 29 and 31 August 1988 (7 to 9 Shahrivar 1367) and took them to the Death Committee, and also that Hamid Noury took prisoners to the place of execution.*
14. Witness questioning with **Azarnoush Hemmati Elizehee** (Peykar) regarding his experiences and observations at Gohardasht Prison from 1988 to 1989, *to prove the mass executions of prisoners at Gohardasht during the period of the crimes in question, that the person who went under the name of Hamid Abbasi at Gohardasht Prison is Hamid Noury, that Hamid Noury participated in the mass executions of prisoners at Gohardasht, that Hamid Noury collected prisoners who were to be taken to the Committee, that Hamid Noury interrogated prisoners before they were taken to the Death*

*Committee, that Hamid Noury was present in the room when Azarnoush Hemmati Elizehee appeared before the Death Committee, and also that, among others, Abbas Raiisi (C 12) was executed.*

15. Witness questioning with **Afsham Roum** Etehadieh Komunistha (the Communist Union) Regarding his experiences and observations at Gohardasht Prison from 1986 to 1989, *to prove the mass executions of prisoners at Gohardasht during the period of the crimes in question, that the person who went under the name of Hamid Abbasi at Gohardasht Prison is Hamid Noury, that Hamid Noury participated in the mass executions of prisoners at Gohardasht, that Hamid Noury took prisoners to the corridor of death and conducted interrogations of the prisoners there regarding, among other things, their religious beliefs, and also that Hamid Noury ordered guards to assault the prisoners.*
  
16. Witness questioning with **Mehdi Aslani Tabrizipoor** (Fadaian Khalgh) regarding his experiences and observations at Gohardasht Prison from 1986 to 1989, *to prove the mass executions of prisoners at Gohardasht during the period of the crimes in question, that the person who went under the name of Hamid Abbasi at Gohardasht Prison is Hamid Noury, that Hamid Noury participated in the mass executions of prisoners at Gohardasht, and also that Hamid Noury selected which prisoners were to be taken to the Death Committee and took prisoners to the corridor of death on 28 August 1988 (6 Shahrivar 1367).*
  
17. Witness questioning with **Amir Houshang Atiabi** (left) regarding his experiences and observations at the prison at Gohardasht from 1988 to 1989, *to prove the mass executions of prisoners at Gohardasht during the period of the crimes in question, that, among others, Adel Rozdar (C 1) and Heidar Nikoo (C 4) were executed, and also that a person with the name of Rahimi was not the same person named as Hamid Abbasi by others.*
  
18. Witness questioning with **Mansour Kamalzadeh** (Peykar) regarding his experiences and observations at Gohardasht Prison from 1988 to 1989 and at Evin from 1989 to 1991, *to prove the mass executions of prisoners at Gohardasht during the period of the crimes in question, and that the person who went under the name of Hamid Abbasi at Gohardasht Prison is Hamid Noury.*
  
19. Witness questioning with **Rahman Darkeshide** [*sic* Darkeshideh] (Fadaian) regarding observations of Hamid Noury in Tehran in 1359 and his experiences and observations at Evin in 1986 and Gohardasht from 1988 to

1989, to prove mass executions of prisoners at Gohardasht Prison during the period of the crimes in question, that the person who went under the name of Hamid Abbasi at Gohardasht Prison is Hamid Noury, that, among others, Mahmoud Ghazi (C 9), Mohsen Rajabzadeh (C 11), Mahmoud Behkish (C 21), Mohamed Ali Behkish (C 20) and Majid Ivani (C 5) were executed.

20. Witness questioning with **Ali Reza Omid Meaf** (Fadaian Khalgh) regarding his experiences and observations at Gohardasht from 1988 to 1989 and at Evin Prison after the executions, to prove the mass executions of prisoners at Gohardasht during the period of the crimes in question, that Hamid Abbasi participated in the mass executions of prisoners at Gohardasht, that Hamid Abbasi on 4 or 5 September 1988 (13 or 14 Shahrivar 1367) interviewed prisoners to select those who were to be executed, and also that Ali Reza Omid Meaf and his fellow prisoners were assaulted on the same day by, among others, Hamid Abbasi.
21. Witness questioning with **Ali Reza Akbari-Sepher** (Fadaian Khalgh) regarding his experiences and observations at Evin Prison from 1983 to 1985 and also at Gohardasht Prison from 1986 to 1988, to prove the mass executions of prisoners at Gohardasht during the period of the crimes in question, that the person who went under the name of Hamid Abbasi at Gohardasht Prison is Hamid Noury, and also that Hamid Noury participated in the mass executions by him being at interviews of prisoners and taking prisoners to the Committee at the end of August and parts of September 1988.
22. Witness questioning with **Mahmud Kahlili** (Sazmane Cherikhaye) regarding his experiences and observations at Gohardasht Prison during the period 1986 to 1989, to prove the mass executions of prisoners at Gohardasht during the period of the crimes in question, that the person who went under the name of Hamid Abbasi at Gohardasht Prison is Hamid Noury, that Hamid Noury participated in the mass executions of prisoners at Gohardasht, that Hamid Noury had a leading position at Gohardasht, that Hamid Noury was in the corridor of death on 27 August 1988 (5 Shahrivar 1367), that Hossein Haji Mohsen (C 2) was imprisoned at Gohardasht in conjunction with the executions, that, among others, Kayvan Mostafavi (C 10), Mohammad Ali Pezhman (C 15), Mohamed Ali Behkish (C 20), Mahmoud Behkish (C21) were executed.
23. Witness questioning with **Nader Haddadi Moghadam** (Fadaian Khalgh) regarding his experiences and findings at Gohardasht Prison during the

period 1987 to 1989, to prove the mass executions of prisoners at Gohardasht during the period of the crimes in question, that Hamid Abbasi participated in the mass executions by jointly with others collecting prisoners to take them down to the Death Committee on 31 August 1988 (9 Shahrivar 1367), and also that, among others, Jafar Rihai (C 13), Sadek Riahi (C 14), Mostafa Farhadi (C 16) were executed.

24. Witness questioning with **Muhammad Esad-Djou** (left) regarding his experiences and observations at Gohardasht Prison during the period 1988 to 1989, to prove the mass executions of prisoners at Gohardasht during the period of the crimes in question, that the person who went under the name of Hamid Abbasi at Gohardasht Prison is Hamid Noury, that Hamid Noury participated in the mass executions of prisoners at Gohardasht, that Hamid Noury collected prisoners on 31 August 1988 (9 Shahrivar 1367) from the unit for the purpose of selecting which prisoners were to be taken to the Death Committee, that Hamid Noury took prisoners to the place of execution, and also that, among others, Hamid Nasiri (C 23), Majid Ivani (C 5), Homoiyon Azadi (C 17), Behzad Omrani (C19), Jafar Riahi (C 13), Sadek Riahi (C 14), Mostafa Farhadi (C 16) were executed.

25. Witness questioning with **Jafar Yaghoobi** (Fadaian) regarding his experiences and observations at Gohardasht Prison from 1986 to 1989, to prove the mass executions of prisoners at Gohardasht during the period of the crimes in question, that Hamid Abbasi had a leading position at Gohardasht, that Hamid Noury participated in the mass executions by on 30 August 1988 (8 Shahrivar 1367) handing over prisoners' files to the Committee, and also that, among others, Ebrahim Najaran (C 22) and Hosein Haji Mohsen (C 2) were executed.

26. Witness questioning with **Mehrzaad Dashtbani** (Peykar) regarding his experiences and observations at Gohardasht and Evin from 1986 to 1989, to prove the mass executions of prisoners at Gohardasht during the period of the crimes in question, that Hamid Abbasi had a leading position, that Hamid Abbasi [sic Abbasi] served at both Gohardasht and Evin, and also that, among others, Adel Rouzdar (C 1), Hosein Haji Mohsen (C 2), Bijan Bazargan (C 6), Mahmoud Ghazi (C 9), Kayvan Mostafavi (C 10), Mohsen Rajabzadeh (C 11), Mohammad Ali Pezhman (C 15), Madjid Walid (C 18), Mahmoud Behkish (C 21) and Sasan Ghandi (C 25) were executed.

Witnesses in respect of the general part

1. Witness questioning with **Kaveh Moussavi** regarding his participation in the report to the Swedish Prosecution Authority in Sweden relating to Hamid Noury possibly being suspected of a crime under international criminal justice, his appearances in the media to draw attention to Hamid Noury having been deprived of his liberty in Sweden and also his knowledge about the structure and hierarchy among staff operating in the Iranian prisons during the period of the crimes in question, *to prove the mass executions of prisoners in Iran during the period of the crimes in question and that Hamid Noury participated in these executions.*
2. Witness questioning with **Rebecca Mooney**, Attorney, regarding her participation in the report to the Swedish Prosecution Authority in Sweden relating to Hamid Noury possibly being suspected of a crime under international criminal justice, *to prove the mass executions of prisoners in Iran during the period of the crimes in question and that Hamid Noury participated in these executions.*
3. Witness questioning with **Geoffrey Robertsson** [sic], Queens Counsel, regarding his work on the report ‘The Massacre of Political Prisoners in Iran 1988’, *to prove the mass executions of prisoners in Iran during the summer of 1988 and also that the executions constituted crimes under international criminal justice.*
4. Witness questioning with **Shadi Sadr**, founder of the ‘Justice for Iran’ organisation regarding her knowledge of the mass executions in Iran during the summer of 1988, her work in cooperation with Amnesty International relating to the ‘Criminal Cover-up’ and ‘Blood - Soaked Secrets’ reports and her contacts with people who have stated that they have information about Hamid Noury and also her knowledge of Iran’s judicial system, *to prove the mass executions of prisoners in Iran during the summer of 1988, that these executions did not have any legal basis under Iranian law, that the assisting prosecutor and his deputy held the judicial power at the prison, that the name Abbasi arose at interviews prior to Hamid Noury’s arrest, and also that the prisoners who were executed were denied the fundamental requirements of a fair trial.*



5. Witness questioning with the Professor of International Law at McGill University in Montreal, **Payam Akhavan**, regarding his knowledge of Iranian justice and of the Iranian regime's actions against its opponents during the eighties and also about his work with the Iran Tribunal where he was the head of the prosecutor team, *to prove the mass executions of prisoners in Iran and its extent, that the prisoners who were executed were denied the fundamental requirements of a fair trial, that the executions constituted crimes under international criminal justice, that there was a link between Mojahedin's cooperation with Iraq during the armed conflict and the decision to execute prisoners who sympathised with Mojahedin, and also that the Iranian regime attempted to keep these executions secret for a long time.*

#### Expert witnesses

1. Witness questioning with **Rouzbeh Parsi**, the Swedish Institute of International Affairs, regarding the political situation in Iran from 1979 to 1988, *to prove the ongoing power struggle between different political groups in Iran during the eighties, the regime's different systems for quashing the opposition, the development of the war between Iran and Iraq and also the mass executions of political prisoners during the summer of 1988.*
2. Witness questioning with Professor **David Thurfjell** regarding and *to prove the historical and religious background to the mass executions in Iran in 1988 and the Islamic Republic's religious and political systems, and also the fatwa/hukm that Khomeini issued in July 1988 and its implications.*
3. Witness questioning with Professor **Jann K. Kleffner** regarding his knowledge of which circumstances determine the assessment of whether there is an armed conflict and how it should be classified, *to prove that an international armed conflict prevailed between Iran and Iraq during the period of the crimes in question and that Mojahedin participated in this armed conflict and also that Mojahedin had an adequate level of organisation and also that the armed violence between Iran and Mojahedin was also of such an intensity that a non-international armed conflict also prevailed.*

4. Witness questioning with **Sally Longworth**, LL.M, regarding her knowledge of which circumstances determine the assessment of whether there is an armed conflict and how it should be classified, *to prove that an international armed conflict prevailed between Iran and Iraq during the period of the crimes in question and that Mojahedin participated in this armed conflict and also that Mojahedin had an adequate level of organisation and also that the armed violence between Iran and Mojahedin was also of such an intensity that a non-international armed conflict also prevailed.*
  
5. Witness questioning with Professor Emeritus **Ove Bring** regarding the law in terms of crimes under international law in general and the assessment of its application in terms of the executions, torture and inhuman treatment of those prisoners who belonged to/sympathised with Mojahedin in Iran during the summer of 1988, *to prove that these criminal acts are to be assessed as crimes under international law.*
  
6. Witness questioning with Professor **Mark Klamberg** regarding the law in terms of crimes under international law in general and the assessment of its application in terms of the executions, torture and inhuman treatment of those prisoners who belonged to/sympathised with Mojahedin in Iran during the summer of 1988, *to prove that these criminal acts are to be assessed as crimes under international law.*
  
7. Witness questioning with **Torun Lindholm**, regarding our ability to remember, *to prove that it is possible for witnesses to recount memories from over thirty years back in time and that were created under severe stress.*

### ***Written evidence***

*It is requested that the Court permits in accordance with Chapter 46, Section 6, fourth paragraph of the Code of Judicial Procedure the presentation of written evidence by referring to the documents. Large parts of the written evidence will be presented verbally at the main hearing – albeit in a more summarised form.*

1. Report received from the law firm McCUE & PARTNERS regarding *and to prove how Hamid Noury came to be suspected of a grave crime under international law and murder and which information was provided in conjunction with the report, including photographs picturing Hamid Noury*, Main Record, pages 11 to 42, 103, 121 to 140.
2. Statement of opinion from Professor Jann K. Kleffner, dated 24 April 2020, regarding which circumstances determine the assessment of an armed conflict and how it should be classified *to prove that an international armed conflict prevailed between Iran and Iraq during the period of the crimes in question and that Mojahedin participated in this armed conflict and also that Mojahedin had an adequate level of organisation and also that the armed violence between Iran and Mojahedin was also of such an intensity that a non-international armed conflict also prevailed*, pages 1 to 18 of Record Appendix H2.
3. Statement of opinion from Sally Longworth, LL.M, dated 15 September 2020, and supplementary statement of opinion, dated 9 November 2020, regarding which circumstances determine the assessment of an armed conflict and how it should be classified, *to prove that an international armed conflict prevailed between Iran and Iraq during the period of the crimes in question and that Mojahedin participated in this armed conflict and also that Mojahedin had an adequate level of organisation and also that the armed violence between Iran and Mojahedin was also of such an intensity that a non-international armed conflict also prevailed*, pages 37 to 50 in Record Appendix H2 and also page 189 of the Main Record.
4. Supporting information from Professor Mark Klamberg, dated 24 March 2020, regarding the law in terms of crimes under international law in general and the assessment of its application in terms of the executions of those prisoners who belonged to/sympathised with Mojahedin in Iran in 1988, *to prove that these criminal acts are to be assessed as crimes under international law*, pages 49 to 75 in Record Appendix H1.
5. Statement of opinion dated 12 February 2020, and follow-up memorandum dated 20 May 2020, from Professor Emeritus Ove Bring regarding the law in terms of crimes under international law in general and the assessment of its application in terms of the executions of those prisoners who belonged to/sympathised with Mojahedin, *to prove that these criminal acts are to be assessed as crimes under international law*, pages 103 to 107, 113 to 116 in Record Appendix H1.

6. Statement of opinion, dated 21 April 2020, from Rouzbeh Parsi, the Swedish Institute of International Affairs, regarding the political situation in Iran from 1979 to 1988, *to prove the ongoing power struggle between different political groups in Iran during the eighties and the regime's different systems for quashing the opposition, the development of the war between Iran and Iraq and also the mass executions of political prisoners during the summer of 1988*, pages 1 to 10 of Record Appendix H1.
7. Statement of views from Professor David Thurfjell, dated 20 February 2020, regarding and *to prove the historical and religious background to the mass executions in Iran in 1988 and the Islamic Republic's religious and political systems, and also the fatwa/hukm that Khomeini issued in July 1988 and its implications*, pages 21 to 34 of Record Appendix H1.
8. Report from the Ministry for Foreign Affairs, 'Mänskliga rättigheter, demokrati och rättstatens principer i Iran 2015-2016' [Human rights, democracy and principles of the rule of law in Iran, 2015-2016], regarding and *to prove that serious shortcomings prevail in Iran in respect of human rights and also that serious inadequacies prevail in respect of legal security and also that torture and coerced confessions arise*, pages 1 to 17 of Record Appendix J2.
9. Report from the Iran Tribunal 'Findings of the Truth Commission', regarding the interviews held in London from 18 to 22 June 2012, *to prove the circumstances at the various detention facilities and prisons around Tehran during the eighties, that mass executions of prisoners took place in Iran and at Gohardasht during the period of the crimes in question, which people constituted the leadership at Gohardasht and also which people participated in the mass executions, including Hamid Noury, that the Iranian regime disregarded basic human rights and also carried out extrajudicial executions, that the aggrieved parties and witnesses Vida Rostamalipour, Hossein Maleki, Rahman Darkeshideh, Mokhtar Shalalvand, Hamid Ashtari, Homayoun Kaviyani testified in 2012 about the mass executions and fellow prisoners who were executed, that the executions contravened international criminal justice, and also that Manouchehr Rezaii (A 41,) Bijan Bazargan (C 6) and Eberahim Najaran (C 22) were executed*, pages 1 to 431 of Record Appendix J1.
10. The Iran Tribunal's judgment regarding and *to prove the mass executions of prisoners in Iran during the period of the crimes in question and also that the executions contravene international criminal justice*, pages 161 to 212 of Record Appendix J2.
11. The Iran Tribunal's list of prisoners executed during the summer of 1988 *to prove the mass executions of prisoners in Iran during the summer of 1988*,

*and also that many of the prisoners whose names were stated in Appendices A and C were executed, pages 74 to 165 of Record Appendix J3.*

12. The United Nations General Assembly public documents from the 43<sup>rd</sup> Session (43/147) relating to human rights in Iran from 8 December 1988, *to prove the mass executions of prisoners in Iran during the period of the crimes in question and Iran's lack of respect for human rights*, pages 155 to 156 of Record Appendix J2.
13. Report by Geoffrey Robertsson [sic] 'The Massacre of Political Prisoners in Iran, 1988', regarding *and to prove the mass executions of prisoners in Iran during the period of the crimes in question and the background thereto, that a nexus prevails between the mass executions of Mojahedin prisoners and the 'Eternal Light' attack, that the mass executions constituted crimes under international criminal justice, that the aggrieved parties and witnesses Abdolreza Shahab Shokoohi, Hamid Ashtari, Mehrdad Neshati Malekians, Iraj Mesdaghi were interviewed in 2009 about their experiences during the mass executions at Gohardasht Prison, and also that Mehrdad Ashtari (A 1), Shahram Shahbakhshi (A 2) and Anusheh Taheri (C 26) were executed at Gohardasht*, pages 1,020 to 1,161 of Record Appendix J1.
14. A report from the Abdorrahman Boroumand Foundation 'The Massacre of Political Prisoners in Iran, 1988: An Addendum. Witness Testimonies and Official Statements', regarding *and to prove the mass executions of prisoners in Iran during the period of the crimes in question, the Iranian regime's actions and statements regarding the mass executions, that a nexus prevails between the mass executions of Mojahedin prisoners and the 'Eternal Light' attack, that the mass executions constituted crimes under international criminal justice, that the aggrieved parties and witnesses Abdolreza Shahab Shokoohi, Hamid Ashtari, Mehdi Aslani, Mehrdad Neshati Malekians, Iraj Mesdaghi, Manoochehr Eshaghi, Hossein Maleki were interviewed in 2009 about their experiences during the mass executions at Gohardasht Prison, that, among others, Ahmad Nouramin (A 58), Behzan Fath Zanjani (A 21), Mahmud Zaki (A 34), Majid Moshref (A 42), Roshan Bolbolian (A 43), Hossein Bahri (A 59), Mehdi Fereidooni (A 100), Jahanbakhsh Sarkhosh (C 8), Mohamed Ali Behkish (A 20) were executed*, pages 1,302 to 1,697 of Record Appendix J1.
15. Print-out and translation of an interview with the witness Hossein Maleki, conducted by the Abdorrahman Boroumand Foundation in 2009, regarding *and to prove the mass executions of prisoners at Gohardasht and that Hamid Abbasi worked at Gohardasht*, pages 111 to 279 of Supplementary Record 1.

16. Amnesty International's Annual Report for 1989 regarding and *to prove the mass executions of prisoners in Iran during the period of the crimes in question and that serious inadequacies prevailed in Iran relating to legal security and that torture arose*, pages 21 to 26 of Record Appendix J2.
17. 'Iran: Violations of human rights 1987 – 1990' report from Amnesty International, regarding and *to prove the mass executions of prisoners in Iran during the period of the crimes in question, that the Iranian regime attempted to keep the mass executions secret, that the executions constituted illegitimate killing, the jurisdiction of the revolutionary courts in Iran between 1987 and 1990 and the inadequate legal security in these courts and also Iran's treatment of prisoners*, pages 36 to 93 of Record Appendix J2.
18. 'Blood - Soaked Secrets' report from Amnesty, regarding and *to prove the mass executions of prisoners in Iran during the period of the crimes in question and the background thereto, that the executions constituted illegitimate killing, which people were active in the Death Committee at Gohardasht, that many of the executed prisoners' bodies were buried in mass graves, that the Islamic regime acted for a long period to keep the mass executions and its statements regarding the executions secret, that the aggrieved party Asghar Mehdizadeh talked about the mass executions at Gohardasht and that he was inside the execution room and saw prisoners being executed, that Adel Talebi (C 3), Mahmoud Behkish (C 21), Mohamed Ali Behkish (C 20), Mohsen Delijani (C 24), Bijan Bazargan (C 6), Gholam Reza Kiakojori (A 50), Hosein Haji Mohsen (C 2), Mansour Hariri (A 67), Mohammadhasan Khaleghi (A 37), Hosseinali Khatibi (A 87), Jafar Tajaddod (A 40), Mahmoud Zaki (A 34), Behrooz Behnamzades (A 23), Hossein Bahri (A 59), Asadollah Tayebi (A 35), Ramin Ghasemi (A 11), Jafar Khosravi (A 80), Faramarz Delkash (A 24), Abbas Yeganeh (A 32), Hossein Niakan (A 45), Hamidreza Taherian (A 20), Mohammadreza Mohajeri (A 33), Karim Khoshafkar (A 88), Asghar Masjedi (A 15), Hadi Jalaloldin Farahani (A 66), Reza Azali (A 83), Heidar Sadeghi (A 89), Alireza Mehdizadeh (C 19), Faramarz Farahani (A 91), Ali Haghverdi (A 92), Hamid Ardestani (A 63), Iraj Jafarzadeh (A 65), Taher Haghghat Talab (A 38), Mohammadreza Shahir Eftekhari (A 27), Hadi Azizi (A 36), Roshan Bolbolian (A 43) were executed*, pages 433 to 633 of Record Appendix J1.
19. A report from Amnesty 'Criminal cover up' regarding the Islamic regime's measures to cover over the mass graves where the bodies of those prisoners executed during the period of the crimes in question were placed, *to prove the mass executions and that the regime attempted to keep the executions*

*secret and also that suspected perpetrators at the mass executions were not tried, pages 959 to 989 of Record Appendix J1.*

20. A report from Justice for Victims of 1988 Massacre in Iran (JVMI) ‘Inquiry into the 1988 mass executions in Iran’, published in 2017, regarding *and to prove the mass executions of prisoners in Iran including prisoners at Gohardasht during the period of the crimes in question, which senior officials worked in the revolutionary courts and in the Death Committee in Tehran, that a person who went under the name of Hamid Abbasi was an assistant to the deputy prosecutor at Gohardasht and that this person was present at the executions, that the aggrieved parties Mahmoud Royaie, Mohammed Zand, Akbar Samadi, Asghar Mehdizadeh, Hossein Farsy and the witness Hassan Ashrafian were interviewed, and also that Reza Zand (A 13), Mohsen Seyyed Ahmadi (A 10) and Hossein Niakan (A 45) were executed, pages 335 to 401 of Supplementary Record 1.*

21. Article written by Payam Akhavan, ‘Is Grassroots Justice a Viable Alternative to Impunity?: The Case of the Iran People’s Tribunal’, regarding the background to the Iran Tribunal, the work and focus of the Tribunal, the judgment of the Tribunal and its importance together with Iranian reactions following the judgment, *to prove that mass executions of prisoners were carried out in Iran during the period of the crimes in question and that the executions constituted crimes under international criminal justice, pages 3 to 65 of Record Appendix J3.*

22. Article submitted by Payam Akhavan from the Borhan website showing the criticism that the Iran Tribunal caused in Iran, *to prove the mass executions of prisoners in Iran during the period of the crimes in question, that a nexus prevails between the executions and the attack on 26 July 1988 and also that the Iranian regime saw prisoners who sympathised with Mojahedin as the enemy, pages 67 to 72 of Record Appendix J3.*

23. Translation of the fatwa into Swedish, *to prove the mass executions of prisoners who sympathised with Mojahedin in Iran during the period of the crimes in question and also a nexus between these executions and the armed conflict, page 257 of Record Appendix J2.*

24. Operative analysis – literature review regarding the Iran-Iraq war and Iraqi support for and cooperation with Mojahedin during the Iran-Iraq war *to prove that Iraq and Mojahedin had substantial military cooperation by the end of the Iran – Iraq war and that the armed conflict was to be assessed as an international armed conflict between Iran and Iraq in which Mojahedin participated, pages 143 to 164 of the Main Record.*

25. Extract from the book 'The Lessons of Modern War', Volume II, Chapter 10 regarding the development of the Iran-Iraq war, *to prove that an international armed conflict prevailed between Iran and Iraq during the period of the crimes in question in which Mojahedin participated*, pages 167 to 187 of Record Appendix J3.
26. Extract from Hossein Ali Montazeri's memoirs regarding and *to prove the mass executions of prisoners during the period of the crimes in question, that the executions are linked to the armed conflict and also that the executions were not compatible with Iranian legislation*, pages 302 to 319 of Supplementary Record 1.
27. Interviews with Hossein Ali Montazeri regarding and *to prove the mass executions of prisoners during the period of the crimes in question and that the executions were not compatible with Iranian legislation*, Record Appendix, Digital Media U37-3.
28. Satellite picture of Gohardasht Prison regarding and *to prove the appearance and location of the prison buildings*, page 188 of the Main Record and also pages 203 to 209 of Record Appendix M1.
29. Sketches of Gohardasht submitted by Iraj Mesdaghi regarding and *to prove what the prison looked like both externally and internally*, pages 31 to 54 of Record Appendix F3.
30. Photographs of prisoners and staff, *to prove that Hamid Noury was the person who went under the name of Hamid Abbasi at Gohardasht Prison*, pages 272 to 274 of Record Appendix F1.
31. Mehdi Eshaghi's judgment regarding and *to prove that he was sentenced to ten years' imprisonment in 1982*, pages 161 to 163 of Record Appendix F2.
32. List of executed fellow prisoners submitted by Ali Zolfaghari regarding and *to prove that, among others, Amir Hossein Karimi (A 73), Farzin Nosrati (A 18), Masoud Khasto (A 79) and Mohsen Sadeghzadeh Ardabili (A 78) were executed at Gohardasht during the period of the crimes in question*, page 351 of Record Appendix F2.
33. List of executed prisoners during the mass executions at Gohardasht compiled by Deljou Abadi (Iranian Refugees Alliance) regarding and *to prove that a large number of the prisoners referred to in Appendix A were executed*, File U72-4, Digital Material 2 in Supplementary Record 1.
34. Notes by Ramezan Fathi regarding executed fellow prisoners *to prove that, among others, Naser Mansouri (A 31), Kaveh Nasri (A 48), Farhad Atrak*



*(A 60), Seyed Ali Vasli (A 94) and Ali Haghverdi (A 92) were executed during the mass executions at Gohardasht, page 492 of Record Appendix F2.*

35. Extract from ‘The Black Book 67’ regarding prisoners executed during the mass executions in 1988 *to prove that Jahanbakhsh Sarkhosh (C 8), Mohsen Rajabzadeh (C 11), Abbas Raiisi (C 12), Jafar Rihai (C 13), Sadek Riahi (C 14), Mostafa Farhadi (C 16), Homoiyon Azadi (C 17), Madjid Walid (C 18), Behzad Omrani (C 19) and Hamid Nasiri (C 23) were executed at Gohardasht, that Hosein Haji Mohsen (C 2), Adel Talebi (C 3), Heidar Nikoo (C 4), Majid Ivani (C 5), Bijan Bazargan (C 6), Mahmoud Alizadeh Azami (C 7), Kayvan Mostafavi (C 10), Mohammad Ali Pezhman (C 15), Mohamed Ali Behkish (C 20), Mahmoud Behkish (C 21), Ebrahim Najaran (C 22), Mohsen Delijani (C 24) and Sasan Ghandi (C 25) were executed, pages 429 to 433 of Supplementary Record 1.*
36. *Recording of police questioning with Hamid Nejati Khalagh dust, now deceased, regarding his experiences and observations at Gohardasht Prison from 1988 to 1989 and also the reason for him being imprisoned to prove that he was sentenced for having sympathised with Mojahedin, that mass executions of prisoners at Gohardasht took place during the period of the crimes in question, that Hamid Abbasi had a leading position at Gohardasht during the mass executions, that Hamid Abbasi was in the corridor of death where Hamid Nejati Khalagh dust was on 6, 9 and 13 August 1988 (15, 18 and 22 Mordad 1367), that he read out the names of prisoners, among others, the name of the aggrieved party, prior to them appearing before the Death Committee, that Hamid Abbasi in the corridor of death where the aggrieved party was at some time on 6, 9 and/or 13 August 1988 (15, 18 and/or 22 Mordad 1367), read out the names of persons to be executed, including Dariush Hanifehpour (A 44), Hadi Saberi (A 51), Iraj Lashgari (A 74), Mahmud Meimanat (A 6), Ali Haghverdi (A 92), Hossein Niakan (A 45), Rahman Cheraghi (A 99) and Gholam Reza Kiakojori (A 50) and took these persons for execution and that Dariush Hanifehpour (A 44), Hadi Saberi (A 51), Iraj Lashgari (A 74), Mahmud Meimanat (A 6), Ali Haghverdi (A 92), Hossein Niakan (A 45), Rahman Cheraghi (A 99) and Gholam Reza Kiakojori (A 50) were subsequently executed, and also that Hamid Nejati Khalagh dust was subjected to severe suffering. (Bengt Hesselberg, Aggrieved Party Counsel)*
37. Book cover from and translation of Iraj Mesdaghi’s book ‘Neither Life Nor Death, Vol. 3 Restless Raspberries’, regarding and *to prove events and circumstances at Gohardasht in 1988, that mass executions of prisoners at*

*Gohardasht took place during the period of the crimes in question, that Iraj Mesdaghi was taken to the Death Committee on several occasions, that several of the persons listed in Appendix A were executed and also to prove those who were members of the Death Committee at Gohardasht, that Hamid Noury participated and had a leading role in the mass executions of prisoners at Gohardasht during the period of the crimes in question, and also that this book was written in 2004 and published in 2006, pages 57 to 58 of Record Appendix F3, 20 to 141 of Supplementary Record 2, 4 to 122 of Supplementary Record 3, pages 9 to 13 of Supplementary Record 4.*

38. Book cover and extract from Iraj Mesdaghi's book 'Till ...The Dawn of Grapes' regarding and *to prove the mass executions of prisoners at Gohardasht during the period of the crimes in question*, pages 60 to 61 of Record Appendix F3, 266 to 328 of Supplementary Record 3, 12 of Supplementary Record 4.
39. 'The Massacre' written by Iraj Mesdaghi, regarding and *to prove events and circumstances at Gohardasht in 1988, that mass executions of prisoners at Gohardasht took place during the period of the crimes in question, that Hamid Noury participated in the executions and also that many of those listed in Appendix A were executed*, pages 43 to 101 of the Main Record.
40. Translation of Iraj Mesdaghi's book 'Eldfåglarnas dans och askans läte' [Dance of the Firebirds and Noise of the Ash], published in 2011, regarding and *to prove events and circumstances at Gohardasht in 1988, that mass executions of prisoners at Gohardasht took place during the period of the crimes in question, that Hamid Noury participated in the executions and also that many of those listed in Appendix A were executed*, pages 143 to 222 of the Supplementary Record 2, pages 198 to 264 of Supplementary Record 3.
41. Extract from Mahmoud Royaie's book 'Aftabkaran', regarding and *to prove mass executions of the prisoners at Gohardasht, that many of the prisoners in Appendix A were executed and also that Hamid Noury participated in the executions*, pages 233 to 246 of Record Appendix J3.
42. Extract from Hossein Farsy's book 'A Galaxy of Stars', published in 2016, (2<sup>nd</sup> edition), regarding and *to prove the mass executions of prisoners at Gohardasht during the period of the crimes in question, that Hamid Noury participated in the executions, and also that, among others, Mahmoud Meimanat (A 6), Dariush Hanifepour (A 44) and Hossein Niakan (A 45) were executed*, pages 435 to 537 of Supplementary Record 3.
43. Extract from Mehdi Aslani's book 'Blommans sista chans' [The Last Breath of the Rose], *to prove that Hosein Haji Mohsen (C 2), Mahmoud Alizadeh Azami (C 7), Jafar Riahi (C 13), Sadek Riahi (C 14) were executed during*

*the period of the crimes in question at Gohardasht and also that Bijan Bazargan (C 6), Hamid Nasiri (C 23) were executed during the period of the crimes in question, pages 290 to 301 of Supplementary Record 1.*

44. Letter from Adel Rouzdar (C 1) and photographs submitted by his sister Sara Rouzdar, *to prove that Adel Rouzdar was imprisoned at Gohardasht and that he was executed during the mass executions during the period of the crimes in question, pages 239 to 240, 242 to 244, 257 to 263 of Record Appendix F3.*
45. Document, submitted by Sedigheh Haji Mohsen, relating to Hossein Haji Mohsen (C 2) comprising birth certificate, death certificate, course certificate, letter of appointment and three letters, *to prove that Hossein Haji Mohsen was executed, pages 265 to 276 of Record Appendix F3.*
46. Photographs submitted by Esmat Talebi Kalhoran showing her brother Adel Talebi's (C 3) bag and other belongings that they received from the public authorities after the executions and the death certificate and also translations of these documents, *to prove that Adel Talebi was executed, pages 287 to 288, 290, 305 to 306 of Record Appendix F3.*
47. Documents, submitted by Majid Atabaki relating to executed fellow prisoners and a translation of these, regarding and *to prove that Roshan Bolbolian (A 43) and Hossein Niakan (A 45) were executed, page 498 of Record Appendix F3, 87 to 88 of Supplementary Record 1.*
48. Documents, submitted by Mokhtar Borojerdy Shalavand, picturing photographs of his brother Hamzeh Borojerdy Shalavand's (A 5) bag that they received back from the Iranian authorities after his brother was executed, his brother's ID document, brief information about his brother and an extract from Mehdi Aslani's book, *to prove that Hamzeh Borojerdy Shalavand was executed at Gohardasht during the period of the crimes in question, pages 10 to 19 of Record Appendix G2, 109 to 119 of Supplementary Record 1.*
49. Documents, submitted by Nasrullah Marandi, showing a judgment, *to prove that Nasrullah Marandi was sentenced to 15 years' imprisonment, pages 54 to 56 of Record Appendix F4.*
50. Video showing a lecture held by Nasrullah Marandi in Stockholm in August 2018, *to prove that Nasrullah Marandi names Hamid Abbasi/Hamid Noury as participating in the mass executions of prisoners at Gohardasht, Digital Material Z119.*

51. Video showing a lecture held by Ahmad Ebrahimi regarding and *to prove mass executions of prisoners at Gohardasht in 1988 and also that Ahmad Ebrahimi was taken to the Death Committee during the period of the crimes in question at Gohardasht, Digital Material U72-9.*
52. Video showing a lecture held by Mahmoud Royaie sent to a TV channel just over 20 years ago, regarding and *to prove the mass executions of prisoners at Gohardasht during the period of the crimes in question and also that Hamid Noury participated in the executions, Digital Material G178-1.*
53. A list submitted by Hossein Farsy of executed persons named in his book ‘A Galaxy of Stars’, *to prove that, among others, Iraj Lashgari (A 74), Akbar Shakeri (A 30) and Reza Abbasi (A 3) were executed, pages 156 to 157 of Record Appendix F4.*
54. Documents, submitted by Amir Atiabi Houshang, showing pictures of his almanac where he noted the days when bodies were loaded onto flatbed trucks and also a drawing of parts of Gohardasht, *to prove the mass executions of prisoners at Gohardasht during the period of the crimes in question, where the prisoners were when they heard the Death Commission discuss the executions and also/ where the bodies were moved over to lorries, pages 64 to 67, 123 to 124 of Record Appendix G3.*
55. Interview with Amir Atiabi held by Iran Human Rights in 2009, *to prove the mass executions of prisoners at Gohardasht and also that Mahmoud Behkish (C 21) and Mohamed Ali Behkish (C 20) were executed, pages 89 to 108 of Supplementary Record 1.*
56. Video interview held by Justice for Iran with Hassan Golzari *to prove that Hossan Golzari was taken to the Death Committee at Gohardasht during the period of the crimes in question and that Hamid Noury was at Gohardasht during this period, Digital Material U163-2.*
57. Email submitted by Mehrzad Dashtbani relating to executed fellow prisoners, *to prove that, among others, Mohammad Ali Pezhman (C 15), Abbas Raiisi (C 12), Bijan Bazargan (C 6), Mohamed Ali Behkish (C 20), Mohsen Rajabzadeh (C 11), Hosein Haji Mohsen (C 2), Mahmoud Behkish (C 21), Anusheh Taheri (C 26), Kayvan Mostafavi (C 10), Mohsen Delijani (C 24), Adel Rouzdar (C 1), Sasan Ghandi (C 25) were executed at Gohardasht during the period of the crimes in question, pages 221 to 222 of Record Appendix G3.*

58. Documents, submitted by Payvand Manouchehr, showing a copy of a judgment, *to prove that Payvand Manouchehr was sentenced to 10 years' imprisonment*, pages 838 to 840 of Record Appendix G2.
59. Documents, including letters, sent by Solmaz Alizadeh regarding and *to prove that Mahmoud Alizadeh Azami was executed at Gohardasht during the mass executions in 1988*, pages 64 to 86 of Supplementary Record 1.
60. Photographs of Gohardasht, page 153 of Record Appendix M1.
61. Memorandum relating to photographs found in Hamid Noury's mobile phone showing and *to prove that Hamid Noury completed military service and that his brother was killed in the war between Iran and Iraq*, pages 2 to 41 of Record Appendix R1.
62. Memorandum relating to contact details found in Hamid Noury's mobile phone indicating and *to prove that Hamid Noury has the contact details of people who may be linked to Evin and Gohardasht and also several contacts within the Iranian judicial system*, pages 44 to 52 of Record Appendix R1.
63. Memorandum relating to SMSs found in Hamid Noury's mobile phone indicating and *to prove that Hamid Noury has a sound knowledge of legal issues, that Hamid Noury has good contacts in Iran's judicial system and also that he calls himself Hamid Abbasi*, pages 59 to 111 of Record Appendix R1.
64. Memorandum relating to pictures of documents and screen dumps found in Hamid Noury's mobile phone indicating and *to prove that Hamid Noury has a sound knowledge of and an interest in legal issues*, pages 113 to 133 of Record Appendix R1.
65. Memorandum relating to WhatsApp chats found in Hamid Noury's mobile phone indicating and *to prove that Hamid Noury has a sound knowledge of legal issues, that Hamid Noury has good contacts in Iran's judicial system and also that Hamid Noury is called Abbasi*, pages 135 to 155 of Record Appendix R1.