

Outsiders: Multifaceted

VIOLENCE AGAINST BAHÁ'ÍS

in the Islamic Republic of Iran



Abdorrahman Boroumand Center | For Human Rights In Iran



 MONASH University

ELEOS JUSTICE

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Acknowledgements	5
Executive summary	6
Scope of the report	9
Theoretical framework: Galtung's theory on violence	9
Data	11
Structure of the report	11
Section 1: History and ideological foundations of Bahá'í persecution	12
History of persecution of Bahá'ís—from inception to Islamic revolution	12
Ideological foundations of Bahá'í persecution in Iran	16
Section 2: Direct violence	22
Unlawful deaths.....	22
Physical violence not resulting in deaths.....	33
Property destruction.....	38
Property confiscations.....	40
Section 3: Structural violence	42
Effects of constitutional omission of the Bahá'í faith.....	42
Education: systematic indoctrination and exclusion	47
Section 4: Cultural violence	54
Anti-Bahá'í narrative: the State, clerics, and media	54
Cultural violence in schools.....	57
Defying cultural violence	60
Section 5: Offences under international criminal law	64
Genocide?	65
Crimes against humanity.....	67
Conclusion	73
Appendix: List of Interviewees	76
Bibliography	78



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Executive summary



History and ideological foundations of Bahá'í persecution

- The Bahá'í faith, originating from the Bábí movement in 1844, faced opposition and persecution from its inception, primarily from the religious establishment and State authorities.
- Throughout different eras (Qajar dynasty, and the reign of Reza Shah and Mohammad Reza Shah Pahlavi's rule), Bahá'ís experienced various forms of persecution, including mob violence, killings, property destruction, and denial of rights.
- While the intensity of persecution fluctuated over time (e.g. Bahá'ís were spared state-sponsored physical violence during most of Pahlavi's rule), the 1979 Islamic Revolution marked the beginning of a new era of more systematic suppression of the Bahá'í community in Iran.
- The Bahá'í faith is seen as a theological challenge to Shi'a Islam and a threat to clerical authority.
- The ideology of Velayat-e Faqih (Guardianship of the Islamic Jurist) leaves little room for religious pluralism, further marginalizing Bahá'ís.
- Bahá'ís are referred to as 'najis' (impurity) or 'proselytisers', in an attempt to justify their discrimination and oppression.
- Bahá'ís are often labelled as a 'political' faction rather than a legitimate religion.
- The State portrays Bahá'ís as agents of foreign powers, particularly linking them to Israel and Western countries.

Direct violence: The persecution of Bahá'ís in Iran has involved severe forms of direct violence in the lead up to and since the establishment of the Islamic Republic in 1979. This violence has manifested in various ways:

- **Unlawful killings:** Numerous Bahá'ís have been executed by the state or killed in extrajudicial killings. Many executions occurred after unfair trials or with no trial at all.
- **Enforced disappearances:** Several cases of Bahá'ís disappearing after arrest have been documented, with authorities providing no information about their fate.
- **Physical violence:** Bahá'ís have faced arbitrary arrests, detention, torture, and other forms of physical abuse. Even children have been subjected to maltreatment in schools.
- **Property destruction:** Bahá'í homes, businesses, and sacred sites have been targets of arson, vandalism, and demolition. Cemeteries have been desecrated, and burial rights violated.
- **Property confiscation:** Hundreds of Bahá'í-owned properties have been seized by authorities, often accompanied by forced evictions and violence.
- **The direct violence against Bahá'ís has been systematic and State-sponsored,** with authorities often failing to investigate or prosecute crimes against Bahá'ís. In many cases, they have actively hindered investigations or intimidated victims' families.
- **The impacts of this violence extend beyond the immediate victims.** Families of those imprisoned or executed have faced ongoing harassment, economic hardship, and psychological trauma. The constant threat of violence has created an atmosphere of fear and insecurity within the Bahá'í community.
- **Despite a decrease in executions since the mid-1980s, other forms of direct violence persist.** The systematic nature of this persecution, coupled with the State's failure to protect Bahá'ís, indicates a clear pattern of religious discrimination and human rights violations against this minority group in Iran. Moreover, occasional extrajudicial killings have enabled the State to continue killing Bahá'ís while avoiding the political cost associated with judicial executions.

Structural violence: Structural violence against Bahá'ís in Iran refers to the systematic discrimination and oppression built into social, political, and economic systems, denying Bahá'ís equal rights and opportunities.

- **The constitution deliberately excludes Bahá'ís from recognized religious minorities.** This constitutional omission means that Bahá'ís have no legal recourse against discrimination, no right to practice their faith openly, and no protection under laws designed to safeguard religious freedoms.
- **This non-recognition of the Bahá'ís faith as a religion provides the basis for systematic discrimination in areas such as education, employment, and property ownership.**
- **A 1991 government memorandum formalised policies to restrict Bahá'ís' progress and development.**
- **Economic suppression includes dismissals from employment and forced business closures.**
- **Since 2023, Bahá'ís have been restricted from registering their marriages, which has consequential effects on the registration of births, divorces, and inheritance claims.**
- **In educational settings, Bahá'ís face both indoctrination attempts and exclusion, particularly in higher education.**

Cultural violence: Cultural violence against Bahá'ís refers to the efforts by the State, religious establishment, and media to create an anti-Bahá'í culture through propaganda, misinformation, and negative stereotyping, which serves to justify and normalize direct and structural violence against the Bahá'í community.

- The State systematically creates an anti-Bahá'í culture through propaganda and misinformation.
- Common themes in anti-Bahá'í rhetoric include portraying Bahá'ís as threats to Islam, spies, or morally corrupt.
- State-controlled media and social media are used to disseminate anti-Bahá'í content, with over 33,000 pieces published between 2017-2021.
- Schools are a focal point for cultural violence, with anti-Bahá'í sentiment present in textbooks, teacher attitudes, and student interactions.
- Some teachers humiliate, exclude, or discriminate against Bahá'í students, while others show acceptance and support.
- Students sometimes adopt anti-Bahá'í attitudes, leading to bullying or avoidance of Bahá'í classmates.
- Despite such exclusion, there is evidence of growing public resistance to anti-Bahá'í propaganda.
- Many interviewees report increasing indifference about, or even support for, the Bahá'í faith from their neighbours and communities. Non-Bahá'í human rights groups and media are beginning to document and report on the persecution of Bahá'ís.
- Changing public attitudes may be due to the public's gradual distancing of itself from religion, as well as increased public access to non-State media and social media.

Offences under international criminal law: The Islamic Republic of Iran's treatment of Bahá'ís, including killings and systematic persecution, constitutes crimes against humanity rather than genocide under international law.

- The killing of Bahá'ís in Iran does not meet the legal definition of genocide due to insufficient evidence of intent to physically destroy the group.
- The persecution of Bahá'ís more appropriately qualifies as crimes against humanity, specifically murder and persecution, as defined in the Rome Statute of the International Criminal Court.
- Evidence of systematic attacks against Bahá'ís includes over 200 executions, denial of religious freedom, education, employment, property rights, and civil rights.
- State policies and official statements demonstrate clear discriminatory intent against Bahá'ís.
- Even though Iran is not party to the Rome Statute, the principle of universal jurisdiction allows other countries to investigate and prosecute these crimes against humanity.

Scope of the report

Theoretical framework: Galtung's theory on violence

Johan Galtung's work on violence is widely regarded as the key foundation of peace and conflict studies. This report applies Galtung's theory of violence, which extends beyond the conventional notion of physical harm, encompassing less visible but equally damaging forms of violence embedded in social structures and cultural norms.¹ Galtung's violence triangle consists of three interconnected types of violence: direct violence, structural violence, and cultural violence. This framework provides a nuanced understanding of the different forms of violence that manifest in society and how they reinforce each other.

Direct violence is the most visible form of violence in Galtung's theory. It refers to physical or verbal actions that cause harm to people or property. Examples include physical assault, murder, torture, verbal abuse, and destruction of property. He defines direct violence as 'violence with a clear subject-object relation'.² This form of violence requires an actor who commits the violent act against a specific individual or an object. In detail, the key characteristics of direct violence include: visibility (the effects are usually immediately observable), intentionality (there is often a clear intent to cause harm), event-oriented (occurs as specific incidents or events), and personal (involves identifiable actors and victims). While direct violence is the most obvious form, Galtung argues that focusing exclusively on this type of violence largely ignores the broader context in which direct violence occurs. He argues that direct violence is often a manifestation of deeper, less visible forms of violence embedded in social structures and cultural norms.

The concept of structural violence is a significant departure from the traditional understanding of violence. Galtung defines structural violence as 'the violence built into the structure and shows up as unequal power and consequently as unequal life chances'.³ Unlike direct violence, structural violence does not have a clear perpetrator. Instead, structural violence is built into the social, political, and economic systems that govern societies. Structural violence manifests as systematic ways in which social structures harm or disadvantage individuals by preventing them from meeting their basic needs. Examples of structural violence are institutionalised discrimination, unequal access to healthcare, education or legal protection and economic opportunities, to name a few. In contrast to the characteristics of direct violence, discussed above, structural violence may be characterised by: invisibility (violence is often not immediately apparent and can be challenging to recognize), process-orientation (violence occurs as ongoing processes rather than discrete events), and impersonality (violence is built into systems rather than carried out by specific individuals). Galtung distinguishes direct violence and structural violence as: 'Personal [direct] violence shows... Structural violence is silent, it does not show—it is essentially static, it is the tranquil waters'.⁴

1 Johan Galtung, "Violence, Peace, and Peace Research," *Journal of Peace Research* volume 6(3) (1969), 167-191.

2 Ibid 171.

3 Ibid.

4 Ibid 173.

Cultural violence is the third component of Galtung's violence triangle,⁵ which he defines as 'those aspects of culture, the symbolic sphere of our existence... that can be used to justify or legitimize direct or structural violence.'⁶ Such aspects include prevailing attitudes, beliefs, and norms. Galtung states that 'cultural violence makes direct and structural violence look, even feel, right—or at least not wrong.'⁷ Cultural violence can manifest in various forms, including stereotypes that normalize violence against certain groups, narratives that dehumanize certain groups and cultural practices that perpetuate harmful traditions. Key characteristics of cultural violence are: symbolism (demonisation of certain groups operate in people's ideas, beliefs, and norms), persistence (cultural violence can persist over long periods, often outlasting specific instances of direct or structural violence), and pervasiveness (cultural violence can be deeply embedded in societal norms and practices).

Galtung's violence triangle has been applied in various disciplines, beyond peace and conflict studies, such as in the fields of development studies and public health,⁸ gender studies,⁹ and environmental studies.¹⁰ Despite the widespread application of Galtung's framework, to our knowledge, it has not been directly applied to the persecution of the Bahá'ís. Nevertheless, published works use similar frameworks to analyze the situation of the Bahá'ís without specifically referring to Galtung. Publications by Karlberg,¹¹ Momen,¹² Ghanea,¹³ Cameron and Danesh,¹⁴ Brookshaw and Fazel,¹⁵ Zabihi-Moghaddam,¹⁶ Afshari,¹⁷ and others all examine the different types of oppression and persecution experienced by Bahá'ís. While these publications do not explicitly use Galtung's framework, they provide analyses that align with his concepts of direct, structural, and cultural violence.

Some scholars have argued that Galtung's definition of violence, particularly structural and cultural violence, is too broad and that labelling various social injustices as 'violence' may dilute the term's traditional meaning and significance.¹⁸ To minimize the devastating impact of physical violence, including the loss of life, experienced by Bahá'ís is not the purpose of the report. This report takes seriously the violations of the right to life to which Bahá'ís have been subjected. By recognizing the multifaceted nature of violence, Galtung's theory allows the reader to appreciate the deeper structural and cultural roots of violence. By applying Galtung's theory to the persecution of Bahá'ís, the report aims to offer a more comprehensive and nuanced understanding of the history and experience of their oppression.

5 Galtung introduced the concept of cultural violence in Johan Galtung, "Cultural Violence," *Journal of Peace Research* volume 27(3) (1990) 291-305.

6 Ibid 291.

7 Ibid.

8 E.g. Paul E. Farmer, Bruce Nizeye, Sara Stulac, & Salmaan Keshavjee, "Structural violence and clinical medicine," *PLoS medicine* volume 3(10) (2006) e449.

9 E.g. Catia C. Confortini, "Galtung, violence, and gender: The case for a peace studies/feminism alliance," *Peace & Change* volume 31(3) (2006) 333-367.

10 E.g. Rob Nixon, *Slow violence and the environmentalism of the poor* (Harvard University Press, 2011).

11 Michael Karlberg, "Constructive Resilience: The Bahá'í Response to Oppression," *Peace & Change* volume 35(2) (2010) 222-257.

12 Moojan Momen, "The Bábi and Baha'i community of Iran: A case of "suspended genocide"? *Journal of Genocide Research* volume 7(2) (2005) 221-241.

13 Nazila Ghanea-Hercock, *Human Rights, the UN and the Bahá'ís in Iran* (Martinus Nijhoff Publishers, 2003).

14 Geoffrey Cameron & Tahirih Tahrirhia-Danesh, *A revolution without rights? Women, Kurds and Baha'is searching for equality in Iran* (The Foreign Policy Centre, 2008).

15 Dominic Parviz Brookshaw & Seena B. Fazel, *The Baha'is of Iran: Socio-historical studies* (Routledge, 2008).

16 Siyamak Zabihi-Moghaddam, "State-sponsored persecution of Baha'is in the Islamic Republic of Iran," *Contemporary Review of the Middle East* volume 3(2) (2016) 124-146.

17 Reza Afshari, "The discourse and practice of human rights violations of Iranian Baha'is in the Islamic Republic of Iran," In Brookshaw & Fazel, 2008, 232-277.

18 E.g. Kenneth E. Boulding, "Twelve Friendly Quarrels with Johan Galtung," *Journal of Peace Research* volume 14(1) (1977) 75-86.

Data

This report is a review of the following publicly available sources: academic literature; reports published by NGOs, including numerous publications by Bahá'í International Community,¹⁹ and international organisations; and the Omid Memorial. The memorial is a digital project that documents and commemorates victims of state killings in the Islamic Republic of Iran ('Iran').²⁰ It involves ongoing research to uncover and verify information about the arbitrary killing of Iranians, often working with families, witnesses, and various sources to piece together these stories. At the time of writing, the Omid Memorial database contained 214 cases of arbitrary killing of Bahá'ís.²¹

In addition, 56 semi-structured interviews and one paper-based interview with Bahá'ís with experience of persecution were conducted in 2023 and 2024.²² The Appendix provides a list of interviewees, with each interviewee being assigned a unique identifier (e.g., I-2). Some interviewees chose to waive their anonymity. The identifiers are referenced in footnotes throughout the report. These interviews form part of Sections 2-4.

Structure of the report

This report aims to provide a comprehensive examination of the multifaceted violence against Bahá'ís in Iran, from historical context to current manifestations and legal implications under international criminal law. The report is in five main sections. Section 1 provides a historical overview of Bahá'í persecution from the faith's inception in 1844 through various Iranian regimes, culminating in the post-1979 Islamic Revolution era. To understand the persistence and intensity of this persecution, this section also examines its ideological foundations. Sections 2, 3, and 4 analyze different forms of violence against Bahá'ís: direct, structural, and cultural. Section 5 takes stock of the findings in previous sections and examines these persecutions through the lens of international criminal law, considering whether they constitute genocide or crimes against humanity.

19 See Bahá'í International Community website, <https://www.bic.org>.

20 See Abdorrahman Boroumand Center's Omid Memorial, <https://www.iranrights.org/memorial>

21 Omid Memorial accessed on 30 September 2024. Using the link (<https://www.iranrights.org/memorial>), select Bahá'í under 'Religion' in the search engine.

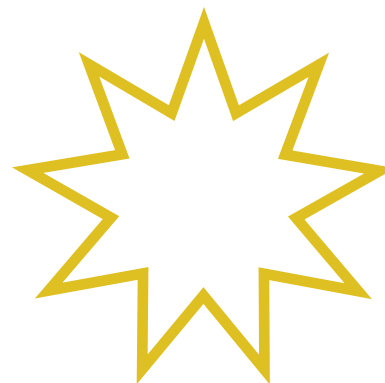
22 We received approval from the Monash University Human Research Ethics Committee to carry out these interviews.

Section 1: History and ideological foundations of Bahá'í persecution

History of persecution of Bahá'ís—from inception to Islamic revolution

Origins of the Bahá'í faith

The Bahá'í faith has its origins from the Bábí movement, a religion founded in 1844 by Sayyid `Ali Muhammad Shirazi, who took the title the 'Báb'.²³ Báb declared himself as the Imam Mahdi, 'a messianic figure expected by the majority religion of Iran, Twelver Shi'a Islam'.²⁴ Concepts of human unity, spiritual renewal and justice in Báb's message were seen as revolutionary and as challenging the existing clerical and political authorities, attracting many Iranians, among them Shi'a clerics and followers who were known as Bábís.²⁵ The religious establishment, who viewed the movement as a threat to the traditional forms of religion, instigated persecutions against the Bábís.²⁶ The Báb was executed in 1850, and thousands of Bábís were killed between 1848–1853.²⁷ By 1852–53, almost all the main Bábí leaders had been killed or exiled, and the Bábí movement largely went underground.²⁸



In the 1860s, a new religion, the Bahá'í faith, emerged, founded by the exiled Bábí leader, Mirza Husayn-Ali Nuri, who took the title Baha'u'llah.²⁹ He claimed to be the religious leader foretold by the Báb and previous revelations, and more than 90 per cent of the surviving Bábís became his followers.³⁰ His influence and the flow of Iranian pilgrims to Baghdad led the Ottomans, under pressure from Iran, to exile Baha'u'llah in 1863 to Constantinople. After being exiled several times³¹ and over 40 years of exile and imprisonment by the Persian and Ottoman authorities, Baha'u'llah was eventually allowed to settle down in Acre (located now in Israel). In the succeeding years, the Bahá'í faith began to spread outside what is now referred to as the Islamic Republic of Iran, becoming one of the most widespread religious systems globally, with Bahá'í communities in almost every country.³² With about 400,000 members in

23 Moojan Momen, "The Bábí and Baha'i community of Iran: A case of "suspended genocide"?" *Journal of Genocide Research* volume (2005) 221.

24 Moojan Momen, "The Baha'i community of Iran: Cultural genocide and resilience," in Jeffrey Bachman (ed), *Cultural Genocide: Law, Politics, and Global manifestations* (Taylor & Francis, 2019) 247.

25 Abbas Amanat, *Resurrection and Renewal: The Making of the Bábí Movement in Iran, 1844-1850*, (Cornell University Press 1989) 191, 257-262.

26 Momen (2019) 247.

27 Ibid.

28 Margit Warburg, "Baha'is of Iran: Power, Prejudices and Persecutions," in Anh Nga Longva and Anne Sofie Roald, *Religious Minorities in the Middle East: Domination, Self-Empowerment, Accommodation* (Brill, 2012) 196.

29 Momen (2019) 247.

30 Momen (2005) 221.

31 Amanat (1989) 282.

32 Friedrich W. Affolter, "The Specter of Ideological Genocide: The Baha'is of Iran," *War Crimes, Genocide & Crimes Against Humanity* volume 1(1) (2005) 77-78.

Iran, the Bahá'í faith constitutes the largest non-Muslim religious minority in the country.³³

Throughout its history, the Bahá'í community in Iran has been subjected to ongoing persecution.³⁴ From the beginning, the Bahá'í faith was opposed by the religious establishment and the Shi'a clergy who believed that Bahá'ís are heretics because of their claim to be a new and independent religion, their claim that both the Báb and Baha'u'llah are prophets and 'manifestations of God', and other doctrines that are perceived to be in conflict with Islamic doctrines.³⁵ State authorities, perceiving the Bahá'í community as a threat due to their teachings and large following, soon engaged in the persecution of Bahá'ís.³⁶ Such persecution was often for political expediency, with the Bahá'ís a 'convenient scapegoat' for the State:

The use of Baha'is as a convenient scapegoat for all the regime's woes is part of a historical pattern of justifying authoritarianism through the construction of imaginary enemies against which the populace must unite in uncritical obedience to their leaders.³⁷

Qajar dynasty (1796–1925)

During the Qajar dynasty, periodic attacks against the Bábís, and later the Bahá'ís, occurred in villages where the clerical establishment was particularly strong.³⁸ To protect their community and religious identity, the Bábís fought back against their attackers, but Báb's successor, Baha'u'llah preached and adopted an apolitical stance and preached non-violence in response to the persecution of the community.³⁹ Regardless, the followers of Báb are believed to have influenced the secular and reformist ideas of the constitutional movement, which was staunchly opposed by some influential clerics.⁴⁰ Mob riots occasionally erupted, which resulted in the killings of Bahá'ís and looting of their properties.⁴¹ In 1903, more than 100 Bahá'í were killed in the City of Yazd.⁴² In 1906, Iran developed its first Constitution, which did not recognise Baha'i as a religious minority, providing the basis for the treatment of Baha'ís as outcasts and legally 'non persons' (discussed in more detail in the 'Structural violence' section).⁴³

33 Momen (2019) 246.

34 Siyamak Zabihi-Moghaddam, "State-sponsored Persecution of Baha'is in the Islamic Republic of Iran," *Contemporary Review of the Middle East* volume 3(2) (2016) 126.

35 Camilia R. Brown, "The Violence Persecution of the Iranian Baha'is: A Call to Take a Human Capabilities Approach to Defining Genocide," *Brooklyn Journal of International Law* volume 43(1) (2017) 367.

36 Warburg (2012) 195.

37 'The Baha'i Question', *Baha'i World News Service* (n.d.) < <https://news.bahai.org/human-rights/iran/semnan/bahai-question#:~:text=More-over%2C%20the%20use%20of%20Baha,uncritical%20obedience%20to%20their%20leaders>>.

38 Affolter (2005) 82.

39 Amanat (1989) 346.

40 Moojan Momen (ed) *The Bábí and Baha'í Religions 1844-1944 Some Contemporary Western Accounts*, (George Ronald Publisher 1981) 294.

41 Warburg (2012) 196.

42 Affolter (2005) 82.

43 Affolter (2005) 82.

Pahlavi dynasty: rule of Reza Shah Pahlavi (1925-1941)

The fall of the Qajar dynasty and the rise to power of Reza Shah Pahlavi led to a considerable decrease of the power of the religious establishment and physical attacks against the Bahá'ís—such as the 1926 mob killings of between eight and 12 Bahá'ís in Jahrum⁴⁴ — diminished considerably.⁴⁵ However, the community witnessed new hostilities. During the latter years of Pahlavi's rule, attacks began to be more focused on depriving Bahá'ís of certain economic, social and cultural rights—shutting down Bahá'í centres and schools, forbidding Bahá'í meetings, preventing them from registering their marriages, dismissing some Bahá'ís from State employment, and stripping some Bahá'í military personnel of their ranks.⁴⁶ Scholars noted that such severe measures during these years might have been motivated by Reza Shah Pahlavi's determination 'to subordinate all other loyalties to allegiance to his person.'⁴⁷

Pahlavi dynasty: rule of Mohammad Reza Shah Pahlavi (1941-1979)

During the rule of Mohammad Reza Shah Pahlavi—who replaced his father in 1941 at a time when Iran was under allied occupation—the Bahá'í community's situation generally improved with some episodes of violence. With a weak central government in the first decade of the Shah's rule, Iran witnessed the resurgence of the influence of the Shi'a clerics, who largely perceived Bahá'ís as enemies of Islam.⁴⁸ In 1953, the forefathers of the Islamic Republic leadership, Ayatollah Abol-Qasem Kachani and the Fedá'iyán Islam (Devotees of Islam,) a group of radical clerics who engaged in political assassinations, used their mobilization power in support of the overthrow of the then nationalist and secular Prime Minister Mohammad Mossadegh.⁴⁹

In a bid to reward the Shi'a clerical establishment and to consolidate power, the new Shah allowed the most virulent anti-Bahá'í clerics to persecute the Bahá'ís in the mid-1950s.⁵⁰ Along with the empowerment of the Shi'a clerics, many Islamic societies were established, mostly with anti-Bahá'í agendas.⁵¹ The Hojjiatiyeh Society was established in 1953 with the explicit goal of combating Bahá'í influence.⁵² The Society, whose infiltration of the Bahá'í community has been linked to the waves of arrests, imprisonments, and executions of Bahá'ís following the Revolution, enjoyed the express endorsement of Ayatollah Khomeini.⁵³

During this period, religious zealots instigated persecution against the Bahá'ís ranging from expelling

44 Yazdani (2018) 161.

45 Mina Yazdani, "Quiet Strangulation: Islamic Republic's treatment of Baha'is since 1991," *Tiempo Devorado* volume 5 (2) (2018) 156-181.

46 Yazdani (2018) 161.

47 Douglas Martin, "The Persecution of the Baha'is of Iran, 1844-1984," *Baha'i Studies*, 12/13 (1984), 20; Yazdani (2017) 68.

48 Mina Yazdani, "Towards a History of Iran's Baha'i Community During the Reign of Mohammad Reza Shah, 1941-1979," *Iran Namag* volume 2(1) (2017) 68.

49 Said Amir Arjomand, *The Turban for the Crown: The Islamic Revolution in Iran, Studies in Middle Eastern History* (Oxford University Press, 1988), p. 87, 94; Fakhreddin Azimi, *The Quest for Democracy in Iran* (Harvard University Press 2008) 143; Roya Boroumand, *Le Mouvement National Iranien et les Grandes Puissances Pétrolières*, unpublished PhD thesis, volume II (Sorbonne University 1989) 668, 667.

50 Yazdani (2018) 161.

51 Yazdani (2017) 69.

52 Ali Davani, *Nihzat-i Rawhaniyun [Movement of the Clergy]*, Vol. 3.

53 Iran Human Rights Documentation Center, *A Faith Denied: The Persecution of the Baha'is of Iran* (2006) 13.

them from their homes to raiding, looting, and burning their homes and places of work.⁵⁴ The State placed restrictions on Bahá'í activities and prohibited Bahá'í employees of the State from speaking about their faith.⁵⁵ This further emboldened the religious zealots and the severity of attacks increased, including sporadic killings of Bahá'ís in different parts of Iran.⁵⁶ For example, three Bahá'ís were brutally murdered in August 1944, followed by more killings in the succeeding months and years.⁵⁷ In 1955, clerics were allowed to use national radio to incite Muslims to wage a holy war against the Bahá'ís, which resulted in a wave of anti-Bahá'í violence across Iran.⁵⁸

[M]ullahs and army officials joined hands in destroying the Bahá'í National Headquarters, and the government ordered the suppression of all Bahá'í activities. As a result, Bahá'í holy places were occupied and ransacked, homes and farms looted and burned, Bahá'í cemeteries desecrated; adults were beaten, young women abducted and forced to marry Muslims, children expelled from schools and many dismissed from their employment.⁵⁹

In July 1955, mobs killed seven Bahá'ís in Hurmuzak village.⁶⁰ During and after the attacks, the National Spiritual Assembly of the Bahá'ís of Iran filed several appeals for protection and justice with the State authorities. These included protesting the use of State radio stations in vilifying the Bahá'ís; explaining the Bahá'í doctrines; and emphasising Iran's human rights obligations, including the United Nations' recognition of the Bahá'í International Community as a non-governmental organisation.⁶¹ Bahá'í institutions around the world also sent numerous appeals to the State, highlighting that news about the repression of Bahá'ís in Iran was widely circulating in the public press around the globe, and reminding the State of its human rights commitments.⁶² Eventually, the attacks reduced considerably, resulting in the State's refusal to comply with requests from clerics to purge Iran of the Bahá'í community.⁶³ Although sporadic mob attacks and killings of Bahá'ís as well as raiding and looting of their properties still occurred, Bahá'ís experienced relative safety from the late 1950s until about 1978, even though they remained 'officially non-existent in the country'.⁶⁴

Toward the Revolution and beyond

After two decades of relative calm, mob attacks and threats against the Bahá'ís resurfaced in various parts of Iran in the latter half of 1978, especially in some rural areas. Mob attacks resulted in the

54 Yazdani (2017) 70.

55 Ibid.

56 Ibid.

57 Ibid.

58 Zabihi-Moghaddam (2016) 127.

59 Affolter (2005) 82.

60 Yazdani (2017) 75.

61 Ibid 76-78.

62 Ibid.

63 Ibid 77.

64 Yazdani (2018) 161.

killing of seven Bahá'ís in 1978, and more killings occurred months after the 1979 Islamic Revolution, which were 'alarming signals to Bahá'ís of difficult times ahead'.⁶⁵ Indeed, as the following section will show, the suppression of the Bahá'í community in Iran continues to this day, this time in an even more systematic manner.

In sum, the continuity of Bahá'í persecution from the Qajar era through the Pahlavi era and into the Islamic Republic underscores the deep-seated nature of this ideology in certain segments of the religious establishment and Iranian society under its influence. The persecution of Bahá'ís is not unique to the Islamic Republic but has been a consistent feature of Iranian politics since the faith's inception. This historical continuity lends legitimacy to the persecution in the eyes of its perpetrators. For instance, in a 1955 meeting with the Shah, Ayatollah Ruhollah Khomeini, who would become the Founder and Spiritual Leader of the Islamic Republic, conveyed a message from Grand Ayatollah Hossein Ali Tabatabaei Borujerdi, prominent Shi'a jurist and the head of the seminary in Qom, urging action against the Bahá'ís:

His Majesty, the late king, your crowned father, had this wayward and misguided sect [fergheh zallah] tied up in the stable; now, the people of Iran expect the same from you.⁶⁶

This historical narrative serves to normalise the persecution of Bahá'ís, presenting it as a continuation of longstanding policy rather than a new form of oppression.

Ideological foundations of Bahá'í persecution in Iran

The persecution of Bahá'ís in Iran is rooted in a complex interplay of religious, political, and historical factors that have evolved over more than a century and a half. This systematic oppression, which reached its peak under the Islamic Republic, is underpinned by a multifaceted ideology that combines theological objections, political conspiracy theories, and a particular vision of Islamic rule. To understand the persistence and intensity of this persecution, this report examines its ideological foundations.

The emergence of the Bahá'í faith in the mid-19th century posed a fundamental theological challenge to Shi'a Islam, the dominant religion in Iran. Both Shi'a and Sunni Islamic traditions view Islam as the final divine revelation, making the emergence of a new religion deeply problematic from their perspective.⁶⁷ The Bábí movement, the precursor to the Bahá'í faith, emerged within the context of Shi'a messianic expectations and initially claimed to be a renewal of Islam rather than a new religion. However, its rapid evolution into the Bahá'í faith, with its claim of a new divine revelation and rejection of Shari'a law, was seen as a direct challenge to the unquestionable authority of Islam.

⁶⁵ Ibid 162.

⁶⁶ John Simpson & Tira Shubart, *Lifting the Veil: Life in Revolutionary Iran* (Hodder & Stoughton, 1995)

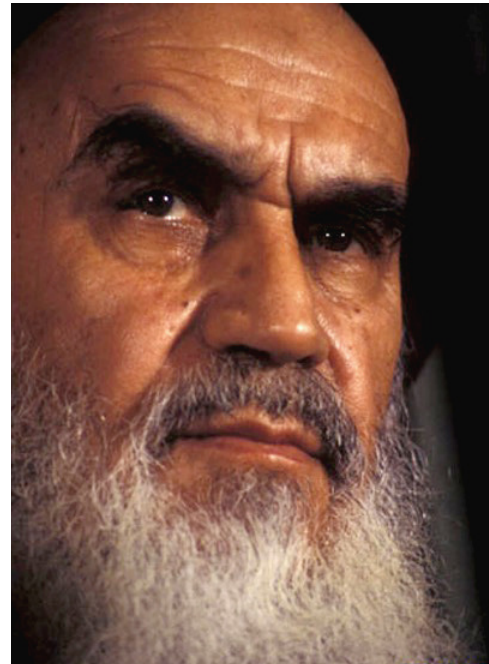
⁶⁷ Shahrough Akhavi, *Religion and Politics in Contemporary Iran* (State University of New York Press, 1980) 76.

The emergence of the Bahá'í faith was perceived as a direct threat to the authority of the Shi'a clergy, who had long enjoyed a monopoly on religious interpretation and guidance in Iran. The Bábí movement challenged the clergy's interpretative monopoly on religious matters. The Bahá'í faith's emphasis on individual interpretation of religious texts, its abolition of a professional clergy, and its integration of secular and religious knowledge all posed significant challenges to the traditional role of the Shi'a ulama (religious scholars). Moreover, the Bahá'í teaching of the progressive nature of divine revelation implied that Islam was not the final word of God, directly contradicting a fundamental Islamic doctrine.⁶⁸

The following highlights the various rhetorical devices used to justify the systematic persecution of the Bahá'ís.

Islamic governance and *Velayat-e Faqih*

The Bahá'í faith was often associated with Mohammad Reza Pahlavi's rule, discussed above, which was viewed as corrupt and anti-Islamic by revolutionary forces. This association, a façade designed to conceal the religious nature of the persecution in question, made the Bahá'ís vulnerable to persecution following the 1979 Islamic Revolution.⁶⁹ The rule by Mohammad Reza Shah Pahlavi saw a relative improvement in the conditions of Bahá'ís in Iran, many of whom gained prominence in their fields as the regime pursued a policy of secularisation and modernisation. However, this improvement was used by the regime's opponents to paint Bahá'ís as collaborators with an un-Islamic government. Ayatollah Khomeini frequently linked the Bahá'í to the Shah's regime in his rhetoric. On June 29, 1963, he declared to visiting clerics:



Ayatollah Khomeini

[R]eligion is in danger... Today the State allows Bahá'í to have governmental jobs and establishes ties to the Jews ... Tomorrow it will announce that religion must be put aside all together.⁷⁰

Ayatollah Khomeini's doctrine of *Velayat-e Faqih* (Guardianship of the Islamic Jurist), which forms the ideological basis of the Islamic Republic, emphasises the supreme authority of Islamic jurists in both religious and political realms. The State infrastructure is inextricably bound to the Islamic faith—such

68 Ronen A. Cohen, *The Hojatiyeh Society in Iran Ideology and Practice from the 1950s to the Present*, 1st ed. (Palgrave Macmillan, 2013). <https://doi.org/10.1057/9781137304773>

69 Firuz Kazemzadeh, "The Baha'is in Iran: Twenty Years of Repression," *Social Research* volume 67, no. 2 (2000) 537-558.

70 Ruhollah Khomeini, *Sahifeh-yei Imam*, Volume One, (The Institute for Compilation and Publication of Imam Khomeini's Works, 2008) 352.<http://stat-icsml.imam-khomeini.ir/en/File/NewsAttachment/2014/1695-Sahifeh-ye%20Imam-Vol%201.pdf>

as the judiciary, membership of which turns on one's loyalty to the regime and his religious, rather than legal, expertise.⁷¹ Such an ideological framework leaves no space for other belief systems. Khomeini asserted: 'It should not be assumed that Islam is like Christianity: only a spiritual relationship between individuals and God Almighty. Islam has a plan for life... for the government.'⁷² This totalizing view of Islam's role in governance inherently excludes and marginalizes non-Islamic belief systems. Under this ideology, there is no separation of church and State; rather, the State is seen as the vehicle for implementing Islamic law and principles. In such a system, there is little room for religious pluralism or the acceptance of beliefs that diverge from the State's interpretation of Islam. Indeed, there is little room for individual autonomy whatsoever: the concept of 'the people' has, since the Revolution, mutated from a collective of free and equal individuals to a mass of believers under the sovereignty of God.⁷³

Hojatoleslam Hossein Musavi-Tabrizi, the then Prosecutor-General of the Islamic Republic (September 1981-January 1984) and former Chief Justice of Azerbaijan Province (July 1979 September 1981), asserted: 'The Quran recognises only the People of the Book as religious communities. Others are pagans. Pagans must be eliminated.'⁷⁴ Statements like this provide a religious justification for the denial of rights and persecution of Bahá'í.

Bahá'ís as deviant proselytizers

Bahá'ís are often labelled as a 'deviant sect' or 'wayward group', positioning them outside the bounds of acceptable religious practice in Iran. This narrative of deviation is often coupled with the idea that Bahá'ís pose a threat by potentially 'seducing' Muslims away from their faith through 'tricks and deceit'.⁷⁵ Ayatollah Ali Hosseini Khamenei Khamenei, the current Supreme Leader of the Islamic Republic, in answering questions about the Bahá'ís, stated:

All believers must confront the deceptions and corruptions of the misguided sect of Bahá'ísm and prevent others from being misled and joining it...

They are impure and enemies of your faith and religion. Therefore, my dear children, stay away from them.⁷⁶

This narrative that Bahá'ís are a threat to Islam and must be avoided is repeated in religious fora, media, and schools (as discussed in Section 4 of this report). For instance, Ayatollah Ghorbanali Dorri-Najafabadi proclaimed that:

71 Mousa Berzin Khalifelo, "Iran Judges: A Selection Process that Paves the Way for Injustice," *Abdorrahan Boroumand Foundation* (10 December 2015) <https://www.iranrights.org/library/document/2877>

72 Musavi Tabrizi, quoted in Akhavan, Payam, "Implications of Twelver Shi'ih Mihdism on Religious Tolerance," in W. Cole Durham Jr. and David M. Kirkham (eds.), *Islamic Law Reform and Human Rights: Challenges and Rejoinders* (Martinus Nijhoff Publishers, 1990).

73 Ladan Boroumand and Roya Boroumand, "Is Iran Democratizing? Reform at an Impasse," *Journal of Democracy* volume 11 (4) (2000) 114, 121.

74 Musavi Tabrizi, "Iran Plans a Final Solution," *Sunday Times* (20 September 1981), quoted in Payam Akhavan, "Implications of Twelver Shi'ih Mihdism on Religious Tolerance," in Kari Vogt and Tore Lindholm (eds), *Islamic Law Reform and Human Rights, Challenges and Rejoinders* (Nordic Human Rights Publications, 1993).

75 Ayatollah Khamenei, 14 May 2016, translated by *Archives of Baha'i Persecution in Iran* <<https://iranbahaipersecution.bic.org/sites/default/files/PDF/English/015327E.pdf>>

76 Ayatollah Khamenei, Fars News Agency (14 May 2016) <https://hawzah.net/Resaleh/List?cid=22&mlid=63190&Title=%D9%83%D8%A7%D9%81%D8%B1https://iranbahaipersecution.bic.org/sites/default/files/PDF/English/015327E.pdf>

Adherence to a principle of belief is permissible, but to openly proclaim and declare it with the purpose of distorting the thoughts of others, creating a trend, or propaganda with the intention to seduce and disturb the minds of others, and other such acts, will not be allowed.⁷⁷

The label of 'deviant' serves multiple purposes in the ideology of persecution. It delegitimizes the Bahá'í faith as an authentic religious movement, portrays Bahá'ís as a threat to the spiritual well-being of the Muslim majority, and justifies restrictive measures against Bahá'í teachings and practices. This idea of deviance has also been employed in pressuring Bahá'ís to recant their faith and 'return to Islam'. For instance, the Head of the Islamic Republic of Shiraz declared:

I use this opportunity to warn all fair-minded Bahá'ís to embrace dear Islam and ...recant Bahá'ísm, which is rationally and logically condemned, before it is too late. Because soon, a day will come when the Muslim nation will deal with the Baha'is the way they dealt with the Monafeqin (the hypocrites)...and will carry out its religious duty and Bahá'ís should know that ...the Hezbollah Umma will have no difficulty uprooting them.⁷⁸

Religious 'impurity' (*najis*)

Related to the idea of Bahá'ís as 'deviant' and a threat to Islam is the narrative that Bahá'ís are 'unclean' or 'impure' (*najis*). In a fatwa issued during the holiest days of the Shi'i calendar, Ayatollah Khomeini declared:

This wayward and misguided sect are infidels and ritually unclean [*kafar va najis*]. Marriage to them is forbidden and they may not enter the bathhouses of Muslims.⁷⁹

This edict has been used to justify social segregation and discrimination against Bahá'ís. The concept of *najis* is deeply ingrained in traditional Islamic jurisprudence and has significant social implications. By declaring Bahá'ís as unclean, this fatwa effectively sanctions their social ostracization and provides religious justification for discriminatory practices. In 2018, Ayatollah Fazel Lankarani affirmed that religious declarations of the 'impurity' of Bahá'ís formalize the othering of them from Muslims:

The ruling on impurity has certain wisdoms, such as preventing Muslims from mixing and associating with them and being influenced by their behavior and ethics. It also ensures that they feel humiliation and inferiority in front of Muslims and realize that they are filthy and impure. There are other benefits as well, which are confirmed and established in the teachings of Islam⁸⁰

77 Archives of Baha'i Persecution in Iran, https://iranbahaipersecution.bic.org/sites/default/files/PDF/Persian/001398P_2.pdf, translated by Abdorrahman Boroumand Center.

78 "On the Death Sentence Against 22 Baha'is in Shiraz," *Khabar-e Jonub newspaper* (22 February 1983). <https://www.iranrights.org/library/document/576/on-the-death-sentence-against-22-bahais-in-shiraz>

79 Fereydon Vahman, *175 Years of Persecution: A History of the Bábís and Baha'is of Iran* (Oneworld Publications, 2019).

80 "The Fatwa of Ayatollah Ozma Fazel Lankarani Regarding Apostasy: People of the Book and Corrupt Beliefs," *Tabnak news* (2 December 2018) <https://www.tabnak.ir/fa/print/856512>

Bahá'ís as political and foreign agents

Another discursive tool utilised by the regime to delegitimize the Bahá'í faith is the framing of its adherents as a political faction. When asked about the prospects of religious and political freedom for Bahá'í under an Islamic government, Ayatollah Khomeini stated: 'They are a political faction. They are harmful. They will not be accepted.' When questioned about their freedom of religious practice, his answer was a straightforward 'no'.⁸¹ This denial of religious freedom is based on the idea that the Bahá'í faith is not a legitimate religion but a political movement and a threat to national security. By framing the Bahá'í faith in these terms, the authorities justify denying Bahá'ís the protections and rights accorded to recognised religious minorities.

A concurrent narrative is that Bahá'ís are the agents of foreign powers. This narrative has been consistently promoted by religious and political leaders, including Ayatollah Khomeini who in 1982 declared:

The Bahá'ís are not a religion, they're a [political] party; it's a party that was supported by Britain in the past, and now it's being supported by America. They are spies.⁸²

The Bahá'í faith has been variously accused of being a creation of Britain, Russia, America, and Israel.⁸³ The characterization of Bahá'ís as agents of Israel has become particularly pronounced: Bahá'ís have been repeatedly accused of supplying information to Israel, where the headquarters of their faith are located.⁸⁴ Ayatollah Khomeini's anti-Bahá'í rhetoric often conflated Bahá'ís with Jews and Zionists, tapping into broader anti-Israel sentiments by referring to 'Jews disguised as Bahá'ís' and 'the Bahá'í Jews'.⁸⁵ By framing the Bahá'í faith as a political and foreign movement, these falsehoods deny religious legitimacy while simultaneously casting the faith as a threat to the Islamic Republic.

This official narrative has also been adopted in legal proceedings and related discourse, providing a formal justification for the State's violent persecution of the Bahá'ís. For instance, in the 1981 trial of seven members of the Bahá'í National Spiritual Assembly, the prosecutor accused Bahá'ís of being spies for reporting to the media about the expulsion of Bahá'í students from schools.⁸⁶ This is similarly evidenced in the case of Farhang Mavaddat, a Bahá'í who was executed in 1981. Mavaddat was formally charged with the various faith-related offences, including promoting, financing, and publishing materials

81 The Institute for the Compilation and Publication of Imam Khomeini's Works, *Sahifeh Imam: The Collection of Imam Khomeini's Works*, Volume One (November 1965 - September 1933) (The Institute for the Compilation and Publication of Imam Khomeini's Works, 1999).

82 Ruhollah Khomeini, *Sahifeh-ye Imam*, Volume 17, September 23, 1982 - July 12, 1983 (The Institute for Compilation and Publication of Imam Khomeini's Works, 2008) p. 427. <http://staticsml.imam-khomeini.ir/en/File/NewsAttachment/2014/1711-Sahifeh-ye%20Imam-Vol%2017.pdf>

83 Mina Yazdani, "The Islamic Revolution's Internal Other: The Case of Ayatollah Khomeini and the Baha'is of Iran," *Journal of Religious History* volume 36 (4) (2012) 562-563. <https://doi.org/10.1111/j.1467-9809.2012.01233.x>

84 "Iran said to arrest 14 more Baha'i as part of recent crackdown," *Times of Israel* (3 September 2022). <https://www.timesofisrael.com/iran-said-to-arrest-14-more-bahai-as-part-of-recent-crackdown/#:~:text=Iran%20has%20claimed%20that%20several,Iran%20in%20the%20mid%2D1800s>

85 Douglas Martin, *The Persecution of the Baha'is of Iran, 1844-1984* (Association for Baha'i Studies, 1984).

86 "Documentary shows trial of executed Baha'is," *BWNS* (Web Page, 21 October 2015) <https://news.bahai.org/story/1076/>

on the Bahá'í faith.⁸⁷ Following Mavaddat's execution, however, the regime's account of events shifted. The following excerpt from the official post-execution report of the Prosecutor's Office demonstrates how the 'agents of Israel' narrative is superimposed onto the truth to legitimize violence:

Farhang Mavaddat, son of Fazlollah, was convicted as an active and effective collaborator in the publication and distribution of seductive and exciting magazines and pamphlets against the Islamic Republic after the victory of the Revolution; feeding cash to the Zionist Nawnahalan Company, which, according to the declarations of the culprit, was the source of the cash feeding of the Zionist "House of Justice" in Haifa, Israel; material, economic and mental collaboration with Zionist agent Hojabr Yazdani; effective association with the Zionist "National Assembly" against the Islamic Republic, and taking operative actions to overthrow this Revolution; being deeply involved in the training and teaching of youth and junior youth in the City of Karaj, to seduce and lead them astray; having allegiance with the heads of the plundering regime [of Pahlavi]; procuring illegal wealth and factory shares and banks, as the declarant himself has confessed. By the order of the Revolutionary Court he was found guilty, identified as an evident example of spreading corruption on earth, and was condemned to execution.⁸⁸

Similarly, in 1983, the Attorney General remarked:

Imperialism accuses us of executing them for being Bahá'ís. We have explained this issue and sent [the explanation] to the Foreign Ministry so they can officially announce that there are many Bahá'ís in Iran today; that we never execute or arrest them solely for being Bahá'ís, but some of them are spies, and we have extensive evidence from the Bahá'í organization that they provide information to foreigners, spy for others, and incite and disrupt certain activities. Sometimes, they collect financial support from Iran and send it abroad.⁸⁹

As this section has illustrated, the ideology underpinning the persecution of Bahá'ís in Iran is multifaceted, drawing on religious, political, and historical narratives. It combines theological objections with conspiracy theories, nationalist sentiments, and a totalizing vision of Islamic governance. This ideology has been consistently promoted by religious and political leaders, encoded in law, and institutionalized in various forms of discrimination and persecution. This ideological framework is crucial for comprehending the persistence and intensity of Bahá'í persecution in Iran.

87 "Report from trial of Farhang Mavaddat, Chair of Baha'i Assembly of Karaj," *Archives of Baha'i Persecution in Iran* (25 April 1981) <https://iranbahaipersecution.bic.org/archive/report-trial-farahang-maveddat-chair-bahai-assembly-karaj>

88 "Kayhan newspaper: Three Baha'is executed," *Archives of Baha'i Persecution in Iran* (25 June 1981) <https://iranbahaipersecution.bic.org/archive/kayhan-newspaper-three-bahais-executed>

89 "Response of the Attorney General to 16 Questions from Kayhan Regarding the Scope of Political Activities, Conditions of Prisoner Freedom, Trial of Leaders of Counter-Revolutionary Groups, Hojjatiya Association, and Fight Against Hoarding and Price Gouging," *Kayhan* (7 September 1983) No. 11952.

Section 2: Direct violence



Direct violence, as defined by Galtung, refers to visible, measurable, and intentional acts that cause harm to people or property. In the context of Bahá'ís in Iran, this violence manifests in several forms. The most extreme form of direct violence against Bahá'ís is the violation of their right to life. This includes extrajudicial killings by State agencies, deaths in custody, application of the death penalty, and mob killings. Other forms encompass physical violence not resulting in death, such as torture following arbitrary arrests and detentions. Testimonies and official statements indicate that physical violence was often used to press Bahá'ís to recant their faith. Additionally, violence against property—including destruction, desecration of cemeteries, and confiscation—represents another dimension of direct violence inflicted on the Bahá'í community. These acts are typically carried out by State actors, such as the police or Revolutionary Guards, or by individuals or groups encouraged by the State's anti-Bahá'í rhetoric. While the intensity of direct violence against Bahá'ís in Iran has fluctuated over time, alternating between periods of severe persecution and relative calm, the threat remains a constant concern for the community. However, it is worth stressing that despite a decline in the number of unlawful deaths, the systematic persecution of Bahá'ís in almost all aspects of their lives has continued, as will be discussed in the next section on cultural violence. This section focuses on the killings and other forms of direct violence suffered by the Bahá'ís at the hands of State and non-State actors.

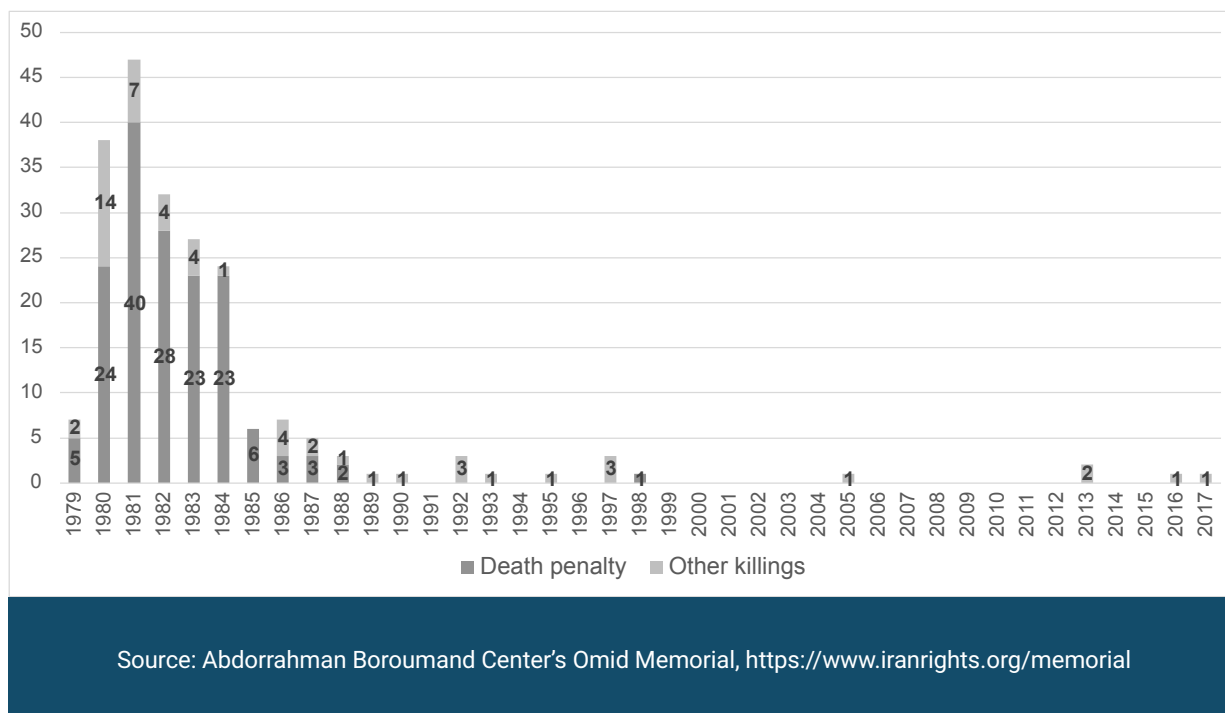
Unlawful deaths

The persecution of Bahá'ís became an official government policy with the establishment of the Islamic Republic of Iran in 1979.⁹⁰ During the months leading up to the February 1979 victory of the Islamic

⁹⁰ Bahá'í International Community, *The Bahá'í Question Revisited: Persecution and Resilience in Iran: A report of the Bahá'í International Community* (2016) 63.

Revolution, physical violence against Bahá'ís intensified. At least seven Bahá'ís were killed in 1978, mostly as a result of mob attacks.⁹¹ In 1979, at least seven Bahá'ís were killed: three were executed, and four were beaten to death or killed in local attacks.⁹² In 1980, at least 38 Bahá'ís were killed, including 24 who were executed by the state.⁹³ In 1981, at least 40 Bahá'ís were executed, and seven others were killed extrajudicially.⁹⁴ During the following years, government executions of Bahá'ís continued: 28 executions were carried out in 1982, 23 in 1983, and another 23 in 1984, while nine Bahá'ís were killed in other attacks.⁹⁵ The killings significantly decreased from 1985 (six executions in 1985, three in 1987, and two in 1988) and gradually abated from then on, with sporadic State-sponsored killings from time to time (see Figure).⁹⁶

Figure: Killings of Bahá'ís, 1979-2017



The Death Penalty

During the first three years of the Islamic Republic, about one hundred Bahá'ís were executed by the government simply on the basis of their faith.⁹⁷ The government often used vaguely defined national security offences to prosecute Bahá'ís, such as 'propaganda against the state' (Islamic Penal Code (IPC), Article 500), 'assembly and collusion to act against national security' IPC, Article 620), 'membership in/

91 Yazdani (2018) 162.

92 Bahá'í International Community (2016) 64.

93 Abdorrahman Boroumand Center's Omid Memorial, <https://www.iranrights.org/memorial>

94 Ibid.

95 Ibid.

96 Ibid.

97 Yazdani (2018) 162.

establishing a group against the state' or 'membership of a deviant cult' (IPC, Articles 498 and 499). The 'evidence' cited includes attendance at Bahá'í prayer groups and community gatherings, or establishing or teaching in educational programmes and centres.⁹⁸ In other cases, Bahá'ís were executed on charges such as 'promoting the dirty, non-Islamic sect of Bahá'ísm in the Islamic Republic of Iran as well as promoting it abroad through his son',⁹⁹ and for being a member of the 'perverse sect of Bahá'í [faith]' and for being 'diligent in opposing the sacred principles of Islam'.¹⁰⁰

Historically, Bahá'í were executed on charges such as espionage, 'corruption on earth', and 'waging war against god'.¹⁰¹ For example, in 1983, the Attorney General stated:

These matters have led us to announce right now that all collective and organizational activities of the Bahá'í community in Iran are prohibited and have always been prohibited, and the Islamic Republic of Iran and its constitution do not recognize them. In this regard, I must say that because some of those arrested claimed that their activities were not officially banned and that they were active, I announce today that due to the sabotage and misconduct occurring within the Bahá'í organization, the Revolutionary Prosecutor's Office of the Islamic Republic recognizes this organization as being *mohareb* at war [with God] and plotters, and any activity in favor of them in any form is prohibited.

Now, if someone is a Bahá'í and practices their religious rites according to their beliefs, does not invite others regarding the Bahá'í faith, does not promote it, does not form circles, does not provide information to others, and does not work with the organization, we have no issue with them; not only do we not execute them, but we do not imprison them either. They can have activities within communities, but if they want to operate organizationally, it is entirely prohibited and a crime because the organization is at war and conspiring, and these individuals are considered enemies of the state.¹⁰²

The circumstances leading to the arrest of Bahá'ís who were executed clearly show that they were targeted merely for being Bahá'í (see Cases 1 and 3 below). In most cases, circumstances surrounding trials are unclear, and relatives of those who were executed claim serious violations of due process, with many not even aware that a trial had been conducted (see Case 2 below). Footage of the 1981 trial of seven members of the Bahá'í National Spiritual Assembly, broadcast in 2015, shows evidence of severe violations of due process from the point of arrest to their executions.¹⁰³ An Iranian lawyer summed up the trial proceedings in one sentence: 'lack of a just trial'.¹⁰⁴ Bani Dugal, Principal Representative of the

98 Human Rights Watch, *The Boot on My Neck: Iranian Authorities' Crime of Persecution Against Baha'is in Iran* (2024) 31-36.

99 Abdorrahman Boroumand Center's Omid Memorial, <https://www.iranrights.org/memorial/story/-3501/azizollah-golshani>

100 Abdorrahman Boroumand Center's Omid Memorial, <https://www.iranrights.org/memorial/story/-8601/ziaollah-ahrari>

101 Abdorrahman Boroumand Center's Omid Memorial, <https://www.iranrights.org/memorial>

102 "Response of the Attorney General to 16 Questions from Kayhan Regarding the Scope of Political Activities, Conditions of Prisoner Freedom, Trial of Leaders of Counter-Revolutionary Groups, Hojatiya Association, and Fight Against Hoarding and Price Gouging," *Kayhan*, September 7, 1983, No. 11952.

103 "Documentary shows trial of executed Baha'is," *BWNS* (Web Page, 21 October 2015) <https://news.bahai.org/story/1076/>

104 Dr. Shirin Ebadi, a prominent Iranian lawyer and Nobel Peace Prize Laureate, who was interviewed in the documentary, as quoted in "Documentary shows trial of executed Baha'is," *BWNS* (Web Page, 21 October 2015) <https://news.bahai.org/story/1076/>

Bahá'í International Community to the United Nations in New York, said:

The film shows a justice system that violates virtually every accepted element of due process, from arbitrary arrest and detention to closed trials and biased judges. The same system which executed Bahá'í in the past continues to imprison them today... The persecution is without justification and not even a single piece of documentary evidence has yet been produced for the allegations against them. It has impacted the lives of generations, from young infants to frail elderly.¹⁰⁵

Many of those executed have been tortured on numerous occasions by State authorities demanding them to renounce their faith (see Case 3). For example, Dr. Farhad Asdaqí, who was executed on 19 November 1984 for 'espionage for a hostile government' and alleged affiliation with Zionist organizations, wrote the following complaint letter to the Birjand Prosecutor concerning his prior arrest in 1981:

I have been interrogated three times by an individual named Nour Mousavi, who seems to have certain missions from the Kashmar Mostazafan Foundation. I have been beaten, sworn at, subjected to insults regarding my sacred religious beliefs, and threatened that I would be killed at the detention center. The reason for my detention is that I am Bahá'í... I would like to officially make a complaint against the aforementioned individual, taking into account the actions of the said individual, such as confiscation of properties, accusations of espionage, closures of medical offices, and imprisonment of doctors, as well as threatening Bahá'ís to create fear and insecurity for their families. According to the laws of the Islamic Republic, and in order to pay my dues to my country, I performed my military service in Birjand and, based on my religious standards, have never verbally or in practice acted against the rules and regulations of my country.¹⁰⁶

An often-overlooked aspect of the death penalty is the impact of executions on families.¹⁰⁷ Secrecy surrounding the death penalty deprives families of information about the imminent execution of their loved one. When families cannot bury their dead, they are deprived of the opportunity for proper mourning and memorialization of the dead.¹⁰⁸ In the case of Dr Asdaqí, his family tried to visit him the day of his execution but were informed that he was not present. Two weeks later, his wife learned that he had been executed on the night of their attempted visit. Authorities indicated that he was buried at Khavaran Cemetery, in Row 89, Number 13, a site designated for Bahá'ís and political activists labelled as 'apostates'.¹⁰⁹ Upon visiting the location, his family found no evidence of a recent burial. A gravedigger subsequently revealed that bodies were interred without shrouds in Row 90.¹¹⁰

105 "Documentary shows trial of executed Baha'is," *BWNS* (Web Page, 21 October 2015) <https://news.bahai.org/story/1076/>

106 Farhad Asdaqí Mamaghani, letter to the Prosecutor of the Islamic Revolutionary Court of Birjand, October 14, 1981, *The Archives of Baha'ís Persecution in Iran*, <https://iranbahaipersecution.bic.org/archive/farhad-asdaqhis-letter-prosecutor-islamic-court-birjand>; <https://www.iranrights.org/memorial/story/-2769/farhad-asdaq>

107 Susan F. Sharp, *Hidden Victims: The Effects of the Death Penalty on Families of the Accused* (Rutgers University Press, 2005) 10-11.

108 United Nations General Assembly, *Extrajudicial, summary or arbitrary executions: Note by the Secretary-General, A/75/384*, 12 October 2020.

109 I-34.

110 Ibid.

Furthermore, the impact of the death penalty on families extends to stigma associated with being a family member of an individual on death row, including cases where children of individuals on death row face discrimination. In the case of Ian Rahimpour Khormaei (see Case 4 below), her execution led to her son being placed in an orphanage, and upon discovering the son's Bahá'í background, the adoptive father abused him. His birth certificate omitted his biological parents' names, and his adoptive father refused to acknowledge him as his adopted son.

Case 1: Hashem Farnush

Hashem Farnush,¹¹¹ who was executed by firing squad in 1981, had suffered harassment at the hands of Iranian authorities prior to his arrest. On 19 October 1980, authorities raided his store, detaining the clerk and confiscating 30,000 rials along with two cheques totalling one million rials, alleging they were 'ritually unclean'. They sealed the store's warehouse, claiming it contained 'ammunition and explosives', and transferred goods valued at over twelve million rials to an undisclosed location. On 1 November, armed guards forcibly entered Mr. Farnush's sister-in-law Gitti's residence without a warrant, to search for him, and conducted a protracted 12-hour search, confiscating important documents and food supplies.¹¹² After he was arrested, Mr. Farnush was detained, interrogated, and brought to Evin Prison.¹¹³ Information regarding Mr. Farnush's trial in the Islamic Revolutionary Court of Markaz is sparse. His family was not provided with documentation outlining the charges against him.¹¹⁴ The Revolutionary Court sentenced Mr. Farnush to death on charges of 'corruption on earth' and 'waging war against God'. He was executed on 22 June 1981, with his family learning of his death through radio broadcasts.

Case 2: 1981 trial of the Bahá'í National Spiritual Assembly members

The seven members of the National Assembly, who were convicted at the trial, plus another member who was not subject to this trial, were all arrested on the same day, 13 December 1981, and executed on the day of the trial, 27 December 1981. They were Mr. Mehdi Amin-Amin, Mr. Jalal Azizi, Dr. Ezzatollah Forouhi, Mrs. Jinous Mahmoudi, Dr. Mahmoud Majzoub, Dr. Sirous Rowshani, Dr. Ghodrattollah Rowhani and Mr. Kamran Samimi. They were tried without any legal representation or real evidence against them. They simply sat in a row while a judge (who is not shown throughout the film documenting the trial), talked for approximately an hour and a half making various accusations against them, including 'defaming the name of the Islamic Republic internationally by providing the media with news of the expulsion of Bahá'í students from schools'. They were secretly executed by a firing squad. Their bodies were buried in barren land reserved by the government and called Kufr Abad—the land of infidels.¹¹⁵

Farhang Mavedat,¹¹⁶ the chair of the National Assembly, was executed on 23 June 1981, after being subjected to solitary confinement and severe torture in cramped cells, where he was required to kneel upon

111 Abdorrahman Boroumand Center's Omid Memorial, <https://www.iranrights.org/memorial/story/-8946/hashem-farnush>

112 "Gitti Jeddi complained to the Judiciary of the Islamic Republic of Iran," *The Archives of Baha'is' Persecution In Iran* (4 November 1980) <https://iran-bahaipersecution.bic.org/fa/archive/shkwayyh-gyty-jdy-bh-dadsray-anqlab-krj>

113 I-26 (Zia Missaghi).

114 Ibid.

115 "Documentary shows trial of executed Baha'is," *BWNS* (Web Page, 21 October 2015) <https://news.bahai.org/story/1076/>

116 Abdorrahman Boroumand Center's Omid Memorial, <https://www.iranrights.org/memorial/story/-4023/farhang-mavedat>

the entrance of guards. He was accused of various offenses, including distributing anti-Islamic Republic materials, funding the Nanahalan Company linked to the 'House of Justice' in Haifa, and conspiring to overthrow the government. Initially charged with participating in a coup d'état, this was dropped due to lack of evidence.¹¹⁷ Authorities used Mr. Mavedat's confessions obtained during investigations and court proceedings as evidence against him.¹¹⁸ The tapes confiscated from his residence were categorized as 'immoral and un-Islamic' and presented as evidence in his prosecution.¹¹⁹ His request for a written defence was denied, and he was tried without a chance to defend himself.¹²⁰ The Islamic Revolutionary Court sentenced Mr. Mavedat to death for the charges of 'corruption on earth' and 'waging war against God'. He was executed by firing squad in Evin Prison, with his family receiving notification of his execution through radio broadcasts. After 19 days of relentless efforts, Mrs. Mavedat succeeded in reclaiming his possessions, which included his will, bearing the letterhead of the Interrogation Session.¹²¹



Farhang Mavedat was prosecuted by Ebrahim Raisi, who later became the eighth President of Iran.

Case 3: Aqa'ollah Tizfahm

Mr. Aqa'ollah Tizfahm,¹²² who was arrested on 21 October 1981, was executed on 10 May 1982 following his refusal to renounce his faith. During his detention, he was subjected to intensive interrogation, he endured brutal conditions in a basement, receiving only dry bread despite being compelled to pay for food, and he suffered 60 lashes.¹²³ Initially confined for 4-5 months in an Islamic Revolutionary Guard Corps (IRGC) facility, he was forced to sleep on the ground with minimal bedding amid harsh winter conditions.¹²⁴ Throughout his seven-month imprisonment, Mr. Tizfahm had only one brief visit from his son, Vahid, and brother, lasting 15-20 minutes, while their mother was denied access. Vahid

117 "Yesterday, Nine Corruptors on Earth were executed," *Ettelaat*, Issue number 16459 (23 June 1981) p2; Mehraeen Mavedat, *Flame of Tests: The Story of Farhang Mavedat*, (Toronto, 2017).

118 *Ettelaat* (1981).

119 I-27 (Mehraeen Mavedat); "A Bahai's Was Tried in the Revolutionary Court on Charges of Believing in the Baha'i Faith," *Iran Times*, Issue number 495, 15 May 1981.

120 Mehraeen Mavedat (2017).

121 I-27 (Mehraeen Mavedat).

122 Abdorrahman Boroumand Center's Omid Memorial, <https://www.iranrights.org/memorial/story/15229/aqaollah-tizfahm>

123 *Ibid.*

124 *Ibid.*

observed visible injuries on his father and other Bahá'í prisoners.¹²⁵ In a letter from Shahr bani Prison, Mr. Tizfahm indicated that he was tried on March 18, 1982, for his religious beliefs, with his family unaware of the proceedings and no attorney willing to represent him.¹²⁶ His family never received official notification of his court order. In a letter dated 13 April 1982, he detailed charges of 'waging war against God, rebelling against Islam, and being a member of the Bahá'í organization', alongside allegations of connections to Zionism and espionage for Israel. The Islamic Revolutionary Court of Orumieh sentenced Mr. Tizfahm to death, a ruling subsequently affirmed by the Supreme Court.¹²⁷ On 8 May, two days before his execution, he was summoned to the prison office, detained for 24 hours, and pressured by Ayatollah Ali Akbar Qoreishi to renounce his beliefs for the welfare of his children, but he resolutely declined.¹²⁸ Ayatollah Ali Akbar Qoreishi has been Azerbaijan's representative to the Assembly of Experts since 1979. He contributed to the drafting of the constitution in 1979.



Aqa'ollah Tizfahm

Mr. Aqa'ollah Tizfahm sustained three gunshot wounds in Orumieh, Azarbaijan-e Gharbi Province, Iran, on May 10, 1982, one of which struck the hand that clutched a photograph of his three-year-old son.¹²⁹

Case 4: Iran Rahimpour Khormaei

Ms. Iran Rahimpour Khormaei,¹³⁰ born in 1938, converted from Islam to the Bahá'í Faith two years after the Islamic Revolution. During her sixth month of pregnancy, she was arrested and imprisoned, denied visitation rights. Her execution, while her son was six months old, was conducted in secrecy without trial in Dezful on May 12, 1982, using a crane in a remote area outside the city, where she was subsequently buried. Following her execution, her son was placed in an orphanage instead of remaining

¹²⁵ I-25.

¹²⁶ Abdorrahman Boroumand Center's Omid Memorial, <https://www.iranrights.org/memorial/story/15229/aqaollah-tizfahm>; "By Order of the Islamic Revolutionary Court of Urmia: 4 Individuals Guilty of Espionage for the Usurper [Israeli] Regime Occupying Al-Quds Have Been Executed," *Ettelaat*, 12 May 1982.

¹²⁷ *Ettelaat* (1982).

¹²⁸ Abdorrahman Boroumand Center's Omid Memorial, <https://www.iranrights.org/memorial/story/15229/aqaollah-tizfahm>; I-25.

¹²⁹ I-25.

¹³⁰ Abdorrahman Boroumand Center's Omid Memorial, <https://iranbahaipersecution.bic.org/archive/iran-rahimpour-khormaie-executed-firing-squad-dezful-12-may-1982>

with her family and was later adopted by a family affiliated with the IRGC. Upon discovering his background, the adoptive father subjected him to psychological abuse, stigmatizing him due to his mother's classification as a 'hypocrite (monafegh)'. His birth certificate omitted his biological parents' names, and his adoptive father refused to acknowledge him. Throughout his childhood, he relied on his adoptive mother for support while his adoptive father imposed an Islamic nickname upon him. This situation exemplifies the erasure of individual identity and the state's failure to issue a death certificate for Ms. Rahimpour.¹³¹



Rahimpour Khormaei

Other killings

The death penalty is not the only way in which the State exercise its lethal control over Bahá'ís. This section includes examples of State-sponsored killings other than the death penalty, as well as instances of Bahá'í deaths under suspicious circumstances where the State failed or refused to investigate or prosecute.¹³² The Abdorrahman Boroumand Center for Human Rights in Iran (ABC) has documented some 32 cases of extrajudicial killing of Bahá'ís between 1979 to 1984, with the most number of deaths recorded in 1980 (14 Bahá'í deaths) and 1981 (seven deaths).¹³³ Known instances of extrajudicial killings significantly declined after 1984. No deaths were recorded in 1985, but there were four in 1986, two in 1987, and one each in 1988, 1989, and 1990. However, sporadic killings have occurred over more recent years.¹³⁴ The Bahá'í International Community has documented at least nine cases where Bahá'ís were killed under suspicious circumstances from 2005 to 2016.¹³⁵ Not one of the perpetrators in these attacks has been prosecuted.¹³⁶

Extrajudicial killings: There are clear cases of extrajudicial killings of Bahá'ís committed by agents of the State. For example, Ezat'ollah Atefi Afusi, his brother Bahman Atefi Afusi, and three other Bahá'í prisoners named Ataollah Rohani,¹³⁷ Ahmad Rezvani,¹³⁸ and Gushtasb Sabet-Rasikh,¹³⁹ were repeatedly shot by prison officials on 11 September 1981 shortly after leaving Daran Prison after they were informed that

131 I-35.

132 William J. Aceves describes the State's obligation to 'investigate potentially unlawful deaths, assign responsibility and remedy violations' as a procedural component of the prohibition against extrajudicial killing. In other words, 'When a state knows or should know that an unlawful killing has occurred, it is required to conduct a prompt, effective, impartial, and transparent investigation'. A more comprehensive explanation of what constitutes 'extrajudicial killing' is available in Aceves' primer: William J. Aceves, "When Death Becomes Murder: A Primer on Extrajudicial Killing," *Columbia Human Rights Law Review* volume 118(50.1) (2018) 117-184. See 151, 144-145.

133 Abdorrahman Boroumand Center's Omid Memorial, <https://www.iranrights.org/memorial>

134 Ibid.

135 Bahá'í International Community, *The Bahá'í Question Revisited: Persecution and Resilience in Iran: A report of the Bahá'í International Community* (2016) 39.

136 Ibid.

137 Abdorrahman Boroumand Center's Memorial, <https://www.iranrights.org/memorial/story/-8331/ataollah-rohani>

138 Abdorrahman Boroumand Center's Memorial, <https://www.iranrights.org/search?query=ahmad+rezvani>

139 Abdorrahman Boroumand Center's Memorial, <https://www.iranrights.org/memorial/story/-8332/goshtasb-sabet-rasikh>

they were free to go home.¹⁴⁰ Mr. Ezat'ollah Atefi's son said that 'only their faces remained uninjured, and their bodies were completely perforated [by bullets].' Officials later claimed that the men had been executed for attempting to escape from prison. They placed the bodies of Mr. Atefi and his brothers in sealed plastic bags and forced one of his sons to bury them without any religious ceremonies.

Mob killings: ABC has documented cases of mob killings in the early years of the Islamic Republic. For example, On 19 November 1983, a mob of villagers from Mohammadiéh Karvan congregated in the village mosque, and proceeded to the house of Bahman Dehqani where he, his wife, and their seven children were present.¹⁴¹ The mob threw rocks at the house and attempted to break the doors to gain entry. The attack lasted from early evening until midnight, leaving Mr Dehqani with severe injuries on his forehead, eye, and chin, resulting in his death. Although the police were notified and several police officers arrived at the scene, they did nothing to help.

Other suspicious deaths: A relatively recent case is that of Ata'ollah Rezvani, an active member of the Bahá'í Community in Bandar Abbas, who was shot in the head from behind on 24 August 2013.¹⁴² Prior to his death, he received repeated threats by unknown individuals. He and some of his family members had been arrested and detained at various times for being Bahá'í, including in 1983 when he was arrested and detained for two weeks during which he lost hearing in his left ear as a result of slaps he received. He had been summoned and interrogated by security agents many times. Authorities repeatedly disrupted his work, including preventing his participation in contract bids and pressuring his customers to discontinue their business transactions with him. Iranian authorities did not make any official statement regarding Rezvani's death, even though it was widely reported in the media and by international institutions.

Similarly, Dr. Manuchehr Hakim was a prominent Bahá'í physician and community leader in Iran, who played a significant role in establishing and managing the Misaghieh Hospital in Tehran. As a respected member of the Bahá'í faith, he served on the National Spiritual Assemblies of both France and Iran. On January 12, 1981, Dr. Hakim was killed in his private practice in Tehran, having been shot once in the forehead. In the months leading up to his death, he had faced interrogation by the Revolutionary Guards and had his passport confiscated. Despite the tense political climate, thousands attended his memorial services, demonstrating the high regard in which he was held. Following his murder, authorities confiscated his property and arrested and tortured a man associated with him, while officially denying any involvement in his death.¹⁴³

Enforced disappearances: The State's pervasive secrecy severely hampers families' access to information, impeding efforts to hold perpetrators accountable and denying them necessary closure. One illustrative case involves the enforced disappearance of all members of the First National Spiritual Assembly on 21 August 1980 while at a meeting to address the dire situation of imprisoned Bahá'ís in Yazd and Hamedan (see Case 5 below).¹⁴⁴

140 Abdorrahman Boroumand Center's Memorial, <https://www.iranrights.org/memorial/story/-7942/ezat-ollah-atefi-afusi>

141 Abdorrahman Boroumand Center's Omid Memorial, <https://www.iranrights.org/memorial/story/-8606/bahman-dehqani>

142 Abdorrahman Boroumand Center's Omid Memorial, <https://www.iranrights.org/memorial/story/-7460/ataollah-rezvani>

143 Abdorrahman Boroumand Center's Omid Memorial, <https://www.iranrights.org/memorial/story/-8595/manuchehr-hakim>

144 Abdorrahman Boroumand Center's Omid Memorial, <https://www.iranrights.org/memorial/story/-8522/yusef-abbassian-milani>

Failure to investigate suspicious deaths: In some instances, Iranian authorities not only failed or refused to investigate suspicious deaths, but directly hindered any investigations, intimidating relatives and confiscating documents that can be used as evidence in courts. For example, in the case of Leila Arezou Kargar, Iranian authorities confiscated a letter from the hospital indicating her cause of death, and her family was unable to access copies of her medical records (see Case 6 below).¹⁴⁵

Case 5: enforced disappearance of the members of the First National Spiritual Assembly

Members of the First National Spiritual Assembly disappeared on 21 August 1980 while at a meeting to address the dire situation of imprisoned Bahá'ís in Yazd and Hamedan. During this time, there were heightened concerns as other members of the Spiritual Assemblies in these cities, who had been arrested in the preceding weeks, were subsequently executed. Later that day, armed Revolutionary Guards raided the Assembly meeting, forcibly detaining all nine National Spiritual Assembly members, namely Hossein Najji,¹⁴⁶ Manuher Qa'em Maqami,¹⁴⁷ Hushang Mahmudi,¹⁴⁸ Ebrahim Rahmani,¹⁴⁹ Abdolhossein Taslimi, Ata'ollah Moqarebi,¹⁵⁰ Yussef Khorassani Qadimi,¹⁵¹ Kambiz Sadeqzadeh Milani, Bahiyeh Naderi,¹⁵² and two Deputy Council members Yussef Abbasian Milani and Heshmatollah Rohani.¹⁵³ This incident marked the last confirmed sighting of these individuals.¹⁵⁴



On 21 August 1980, armed men arrested all the members of the NSA, as well as two of their colleagues, during a regular NSA meeting. The 11 persons abducted during the raid were never seen again by friends or family.

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145 I-30.

146 Abdorrahman Boroumand Center's Omid Memorial, <https://www.iranrights.org/memorial/story/-8494/hossein-naji>

147 Abdorrahman Boroumand Center's Omid Memorial, <https://www.iranrights.org/memorial/story/-8492/manuher-qaem-maqami>

148 Abdorrahman Boroumand Center's Omid Memorial, <https://www.iranrights.org/memorial/story/-8493/hushang-mahmudi>

149 Abdorrahman Boroumand Center's Omid Memorial, <https://www.iranrights.org/memorial/story/-8515/ebrahim-rahmani>

150 Abdorrahman Boroumand Center's Omid Memorial, <https://www.iranrights.org/memorial/story/-8495/ataollah-moqarebi>

151 Abdorrahman Boroumand Center's Omid Memorial, <https://www.iranrights.org/memorial/story/75622/yusef-khorassani-qadimi>

152 Abdorrahman Boroumand Center's Omid Memorial, <https://www.iranrights.org/memorial/story/-8496/bahiyeh-naderi>

153 Abdorrahman Boroumand Center's Omid Memorial, <https://www.iranrights.org/memorial/story/-8505/heshmatollah-rohani>

154 Abdorrahman Boroumand Center's Omid Memorial, <https://www.iranrights.org/memorial/story/-8522/yusef-abbassian-milani>

Case 6: Leila Arezou Kargar

Ms. Leila Arezou Kargar, a Bahá'í music instructor at Nakisa Music School, was summarily dismissed from her work along with her sister after they revealed their Bahá'í faith on a personal information form. The school's director reported that the Ministry of Culture and Islamic Guidance had threatened to vandalize the premises should they be permitted to retain their positions.¹⁵⁵

Kargar's actions that may have drawn unwanted attention included her frequent visits to pray near the former site of the House of the Báb, a significant Bahá'í holy place that had been demolished following the Revolution. On 30 December 2014, Kargar contacted her mother to tell her that she would be home by 4:00 pm after meeting with a new acquaintance to discuss her faith. By approximately 2:00 pm, Kargar returned home in a critically ill condition, displaying symptoms including the vomiting of a dark, foul substance. The family's phone appeared to block outgoing calls, prompting her mother to enlist the help of a neighbour to summon an ambulance.¹⁵⁶

She was brought to the Ali Asghar Hospital, where blood tests revealed a dangerously elevated concentration of aluminium phosphide, a toxic agent commonly utilized in rice farming. The attending physician suspected coercion, noting the substance's repugnant taste and Kargar's blackened nails, indicative of severe poisoning. He informed the family that no antidote was available for this particular poison. The following morning, Kargar was discovered unresponsive and subsequently transferred to the Intensive Care Unit (ICU). When her mother entered the ICU without authorization, she found her daughter with tubes removed and blood-soaked sheets.¹⁵⁷ The following day, the hospital informed Kargar's mother of her death. Subsequently, authorities withheld Kargar's body until her family consented to delete or deny any social media content implicating government involvement in her death.



Ms. Leila Arezou Kargar

After Kargar's death, her family was subjected to intimidation by authorities. A letter from the hospital indicated that Kargar had been poisoned with aluminium phosphide by an unidentified assailant in the park. Ministry officials visited the family, categorically denying the possibility of murder and confiscating the letter when presented as evidence. When the family requested copies of the letter and medical records, they were informed that her file was no longer accessible. Additionally, they were cautioned against engaging with the media, and further interrogations engendered suspicions of State surveillance.¹⁵⁸

¹⁵⁵ I-30.

¹⁵⁶ Ibid.

¹⁵⁷ Ibid.

¹⁵⁸ Ibid.

The family also endured persistent calls from the Ministry of Intelligence via unidentified numbers, accompanied by the interrogation and intimidation of their relatives. Despite assurances from law enforcement regarding an investigation, Kargar's family encountered intimidation and obstruction as they pushed for proper investigation.¹⁵⁹ Kargar's father lodged a formal complaint with the Iranian Police Criminal Investigation Department, but never received any summons, and Colonel Keshavarzi, who had initially pledged a comprehensive investigation, became progressively unresponsive, ultimately asserting a lack of recollection regarding the case.¹⁶⁰

Kargar's body was finally interred on 8 January 2015 at the Bahá'í Golestan Javid Cemetery in Shiraz. Her family received no autopsy results, toxicology reports, or medical documentation, even though they found during the viewing of her body prior to burial, that there were wounds on her neck from the autopsy and extensive sutures across her chest. They only received a death certificate categorizing the cause of death as 'unknown'.

Physical violence not resulting in deaths

In a 2016 report, the Bahá'í International Community documented 68 incidents of unprosecuted physical violence against Bahá'ís since 2005.¹⁶¹ Violence often extends to family members of those who were executed. State authorities have employed torture to coerce Bahá'í into renouncing their faith, to falsely confess to espionage on camera, or to disclose information about fellow Bahá'í.¹⁶²

Family members have also shared their stories of harassment, arbitrary arrests, and being subjected to torture. For example, Rofia Asdaq, wife of Farhad Asdaq who was executed in 1984 (see above on page XX), was also arrested after her husband's execution, and subjected to interrogation.¹⁶³

Under coercive pressure, she was compelled to compose a letter employing pejorative terms for Bahá'ís, labelling them as a 'sect of Zionists' and a 'misguided sect'. Without a court order, she was unlawfully detained in solitary confinement for over a month, after which she was released without



Translation: 'I am Rofia Asdaq (Katebpour Shahidi). My father, Nematollah Katebpour Shahidi, and my husband, Farhad Asdaq, were executed for being Bahá'í'

159 Ibid.

160 Ibid.

161 Bahá'í International Community (2016) 39-40.

162 Amnesty International, *Iran: File on Torture 1985* (31 March 1985), available <https://www.iranrights.org/library/document/105/iran-file-on-torture-1985>

163 I-34.

trial. She and her child, Bashir, were deprived of benefitting from her and her husband's property, as the Imam Khomeini Relief Committee appropriated all of Dr. Asdaqí's assets, claiming that he was single to justify the confiscation of the family home belonging to Rofia and Bashir.¹⁶⁴

Similarly, Ramona, the daughter of Hossein Naji, one of the nine members of the First National Spiritual Assembly who were forcibly disappeared in August 1980, recounted the traumatic events when authorities unlawfully raided their residence in search of her father.¹⁶⁵ Failing to locate him, the authorities resorted to violence against her mother, forcibly dragging her to prison. 'They grabbed her arms, beat her with rifle butts, causing internal bleeding, and dragged her away, handcuffed, to prison', Ramona stated. Her mother endured 17 days of detention marked by incessant interrogations, confined to a small, unsanitary cell. Notably, no court order was presented during the raid or her arrest.¹⁶⁶

Similarly, Mr Mohammad Abbasi was arrested on April 10, 1982, and held in various detention centers, including the Central Committee of Qazvin and Chubin Dar Prison.¹⁶⁷ 45 days after his arrest, Mr Abbasi and seven others were put on trial. Four individuals who recanted their faith were released, while Mr Abbasi and three others who refused to convert were sent back to detention. During his at least 90-day detention, he faced pressure to renounce his Bahá'í faith. When Mr Abbasi's family received his body after the execution, there were visible signs of torture on Abbasi's remains.

More recently, a member of the Bahá'í community was taken one midnight while he was arriving home.¹⁶⁸ This was about three years after their house had been raided by authorities. They took his phone, blindfolded him, put him in the back of a car, and drove away without giving him an opportunity to say goodbye to his family or tell them where they were bringing him. His family did not know where he was over the next two weeks. They subjected him to interrogation, beatings, and threats to rape or kill him. He was kept in solitary confinement for 72 days and subjected him to different forms of torture including pouring cold water over him while he was already in a very cold environment with no warm clothing:

And I remember that they pour, like, cold water once on me. They were beating me with hands I couldn't see them. I had a blindfold all the time. I never saw my interrogator. So, so when they were started, like when they were beating me, they were beating from different places, and I couldn't see where I'm going to be hit...And they were, they were beating for hours, or they were more than one people in the room like the first place. They were beating like from different places, like in one room ... They were pushing



164 Ibid.

165 I-28 (Ramona Naji).

166 Ibid.

167 Abdorrahman Boroumand Center's Omid Memorial, <https://www.iranrights.org/memorial/story/-4249/mohammad-abbasi>

168 I-5.

me to the wall. And I didn't know if it's a wall or if it's another person who is going to take me and, like, beat me. But when they, like, push me, yeah, suddenly I was, I found myself, like, 'boom' in the wall ... And they, they put me in the, on the floor and, like, take me with my hair. So they were doing crazy things or beating me with objects. I don't know what kind of object. Maybe bottle, it was bottle. But, like, even different kinds of objects. Once I remember, they beat me with my chair because I was sitting on my chair like the student chair for exam. I was just writing things with my blindfold here so that I could see. But I was facing the wall, so they were standing behind me. Yeah. I tried not to share information related to other people. And that was one of the reasons I was beaten a lot all the time. All those interrogations. I had near 40 interrogations.¹⁶⁹

Another interviewee recalled being tormented and physically assaulted by authorities during interrogations and detention.¹⁷⁰

Aside from direct physical and psychological torture, some prisoners have also been denied access to necessary medical treatment, which also amounts to a violation of the prohibition of torture and cruel, inhuman and degrading treatment and punishment.¹⁷¹ Mahvash Sabet, who was arrested in 2008 and imprisoned for ten years for her role as a Bahá'í religious leader, was again arrested in 2022, during which security forces reportedly broke her kneecaps during interrogation.¹⁷² She was charged with 'founding or leading an organization that aims to disrupt national security' and subsequently sentenced to ten years in prison following a one-hour trial.¹⁷³ During her earlier imprisonment, Sabet broke her hip, but was not allowed to take medical leave from prison.¹⁷⁴ She is now 72 years old and suffering from severe lung disease, but has not been allowed to access critical medical care while in prison, and authorities refuse to transfer her to a medical facility.¹⁷⁵

Some interviewees shared the lasting impact of their imprisonment. One interviewee recalled living for many years in a cell with two other prisoners who were subsequently executed, describing the lifelong pain they now carry as a result.¹⁷⁶ Another spoke of the psychological torment of counting down the days until being released from prison, only to have additional sentences imposed. They described feeling lost and helpless, not wanting to burden their families with the knowledge of the extended prison term, and not having true friends in prison to confide in.¹⁷⁷ A third recalled how prison officials would taunt their mother and sister:

When my mother was arrested... my sister... was [a child]. During this period, when my

169 I-5.

170 I-16.

171 See e.g. *Salakhov and Islyamova v Ukraine* [2013] ECHR, Application No. 28005/08.

172 "Mahvash Sabet," *United States Commission – International Religious Freedom*, <https://www.uscirf.gov/religious-prisoners-conscience/forb-victims-database/mahvash-sabet>

173 Ibid.

174 Ibid.

175 Iran Human Rights, <https://x.com/ICHRI/status/1845910861694529853>

176 I-5.

177 I-16.

sister's appendix ruptured, resulting in a life-threatening spread of infection, officials of the Ministry of Intelligence informed my mother that my sister suffered from an incurable and unknown disease in order to torment my mother. She was assured of a brief leave to visit my sister after which she waited in her prison cell for two days and nights in her outside clothes only to learn that this was a ruse.

Similarly, when my sister... was getting married... the officials promised my mother that she would be allowed to attend my sister's wedding. While waiting indefinitely for this permission to be granted, my sister had to delay her wedding date several times. Initially, the officials assured my mother of a leave to attend the wedding. Later they promised that she could go but she needed to wear an ankle monitor. Then they requested that the wedding ceremony be held in the visitation hall of [the] prison. Later they suggested that my mother could attend the wedding with prison guards escorting her. At every step of this process, my sister changed her wedding plans to accommodate these demands only to realize finally that this was another ploy aimed at dispiriting and agonizing my family.¹⁷⁸

One interviewee shared how they tried to make the most of their imprisonment:

It was very hard to, you know, accept this [prison sentence] without any crime. But what should I do? ... So I tried to do something for myself, for my family. For example, I wrote, every week I wrote letter for my wife. I did calligraphy in the prison. I was responsible for the library, a small library inside the prison. I did coaching, I made some bracelets, some dolls with threads. And I learned English. Many, many things.¹⁷⁹

Several interviewees shared the impacts of having relatives incarcerated. One recalled how, as a young child, their time was consumed by preparing food, clothing, medication, and other items to deliver to their parents in prison. They shared how they would have to wake up at 4am to begin their journey to the prison for a 15-minute visit, and would return home very late in the evening. As both their parents were incarcerated, they were forced to perform this ritual twice weekly—once to the men's prison, once to the women's prison.¹⁸⁰ Others spoke of long travel times and distances to visit incarcerated relatives.¹⁸¹ A third recalled their family being required to request permission from a prosecutor each time they wished to make a prison visit, waiting for several hours per request.¹⁸² A fourth spoke of visiting the courts every day to ask for information on their family member who had been arrested, never receiving an answer and ultimately being blacklisted from entering the court.¹⁸³

178 I-20.

179 I-15

180 I-13.

181 I-5, I-10.

182 I-15.

183 I-16.

One interviewee, a former prisoner, shared their impression of how imprisonment affects family:

Prisoners sometimes can be happy, you know, because they are together... We could watch films... on TV... We could talk. We could play football. Yeah, we could do things. We could, we could, we could laugh. But what about our families? You know... all the time, they are thinking that we are receiving torture. You know, that that's the kind of like mentality of the families... The very fact that... their son... is in prison, that's a very a difficult thing to deal with. It's more difficult for the families of the prisoner—in this case, Bahá'í prisoners—to deal with the persecution, with the imprisonment than the prisoners. You know, this is a statement that a prisoner can tell you. ... I can tell you, because I was inside, I was outside, and I can tell you which one is more difficult. It was more difficult for me to see my parents have been arrested than when I was arrested. Even when I was tortured, that was easier to deal with than to see your parents, your family, to be arrested.¹⁸⁴

Another interviewee spoke of the constant anxiety associated with having family in prison, and how they navigated this reality as children:

Those years [when several family members were incarcerated] were incredibly stressful, with every phone call potentially bringing news of another arrest or execution. My sister and I, in our innocence, turned our visits to the prison into a form of entertainment, bringing sandwiches to share with other children behind the prison gates and playing together. When news came that my grandfather had suffered a heart attack in prison, just days after my aunt's execution, our family was plunged into a new depth of sorrow. Our home became a gathering place for Bahá'ís who came to comfort us, filling our space with flowers and the soothing sound of prayers. Those moments of support were vital to our healing.¹⁸⁵

Others reflected on the immense toll of losing family members. One interviewee recalled a friend's family being sent pictures of their executed relative with a bullet in the head.¹⁸⁶ Another recounted the death of a family member from dehydration while trying to flee Iran, describing it as 'one of the most painful trials of my life'.¹⁸⁷ A third spoke of the deep pain felt when a close family member was murdered:

This obviously really affected our entire family. Myself, I was very, very close to him at the time. I was just turned 12. And yeah, it was, it was earth shattering. Heartbreaking. And it was the first that I had really felt the full brunt of persecution.¹⁸⁸

184 I-5.

185 I-17.

186 I-1.

187 I-21.

188 I-19.

In sum, while the number of known executions of Bahá'ís have declined, they remain subject to other forms of State-sponsored killings, including extrajudicial executions, and suspicious deaths, highlighting the State's systematic oppression and the failure to investigate or prosecute perpetrators. This section has also explored the lasting impact of these persecutions on Bahá'í families, including the trauma of imprisonment, enforced disappearances, and the constant threat of violence.

Property destruction

In December 1978, against the backdrop of the unfolding Islamic Revolution, mobs attacked the homes and shops of Bahá'ís in Shiraz:

A cleric spoke from the pulpit on three successive nights against the Bahá'ís, declaring that they must convert to Islam or suffer the burning of their homes... During the next two to three days, around two hundred Bahá'í homes were raided, plundered and set on fire, as were a significant number of shops and factories. For the most part, the military forces and police did not interfere or actively restrain or oppose the assaulting mobs. In fact, in some cases, the gas required to fuel the fire was obtained from military vehicles with the permission of military personnel.¹⁸⁹

One interviewee reflected on their experience fleeing the 1978 attacks:

It remained one of the scariest experiences I had. We just left Shiraz and as we were coming out of the city ... we were passing where we knew our Bahá'í friends were living, we would see one like 200 men in black shirts have gathered at the door, and then there was smoke coming from the house. Can you imagine? ... And as we were driving out, I kept turning my head to make sure they are not following us.¹⁹⁰

Since then, several instances of arson and vandalism of Bahá'í homes, cars, and businesses, have been reported across the country.¹⁹¹ Several interviewees spoke of such incidents, in several cases noting that mobs had been incited by clerics.¹⁹²

Whereas these attacks have typically been perpetrated by civilian mobs, reports have emerged of Bahá'í cemeteries being desecrated and demolished by authorities.¹⁹³ For instance, in 2024, attacks against

189 Yazdani (2017) 89-90.

190 I-9.

191 "Arson and Vandalism," *BWNS*, <https://news.bahai.org/human-rights/iran/semnan/feature-articles/arson-vandalism>

192 I-2, I-6, I-8, I-10, I-11, I-13, I-18.

193 Human Rights Watch, "The Boot on My Neck": Iranian Authorities' Crime of Persecution Against Baha'is in Iran (2024); Bahá'í International Community, "Oppressed in Life and Persecuted in Death: Bahá'ís Prevented from Dignified Burials in their Own Cemetery," <https://www.bic.org/news/oppressed-life-and-persecuted-death-bahais-prevented-dignified-burials-their-own-cemetery>



Israel Mercenary, Hezbollah Ummah Hates Bahá'í

cemeteries were reported in Ahvaz,¹⁹⁴ Semnan,¹⁹⁵ and Tehran,¹⁹⁶ involving the destruction of graves, arson, and graffiti. Alongside such abuses, the authorities routinely interfere with burial processes. This includes preventing Bahá'ís from burying their dead in accordance with Bahá'í practice and in Bahá'í cemeteries and charging exorbitant fees for burials.¹⁹⁷ Between March and May 2024, at least six Bahá'ís were improperly buried by authorities 'without the knowledge of their families and in violation of burial practices'.¹⁹⁸ One interviewee shared the litany of abuses suffered following a family member's death from COVID-19, recalling that the authorities said:

You have to pay us money to bury [your family member], you have to pay us money to go and visit your dead, and you're not allowed to have group of people get together... at the burial.¹⁹⁹

194 "Bahá'í Cemetery in Ahvaz Subjected to Arson," *Iran Press Watch* (21 August 2024) <https://iranpresswatch.org/post/24998/bahai-cemetery-in-ahvaz-subjected-to-arson/>

195 "Semnan's Baha'i Cemetery Vandalized," *Iran Press Watch* (13 May 2024) <https://iranpresswatch.org/post/24850/semnans-bahai-cemetery-vandalized/>

196 "Unprecedented and Inhumane: More Than 30 Baha'i New Graves Razed by Iranian Authorities," *Iran Press Watch* (8 March 2024) <https://iranpresswatch.org/post/24572/unprecedented-and-inhumane-more-than-30-bahai-new-graves-razed-by-iranian-authorities/>

197 Human Rights Watch, 2024.

198 "Updated: Fifth Improper Burial of a Baha'i by Iranian Officials," *Iran Wire* (4 May 2024) <https://iranwire.com/en/bahais-of-iran/116190-fifth-improper-burial-of-a-bahai-by-iranian-officials/>

199 I-19.

Property confiscations

Iranian authorities have confiscated hundreds of Bahá'í-owned properties, with forced evictions often accompanied by threats and physical violence.²⁰⁰ Between 1980 to 2006, at least 640 Bahá'í properties—including houses, agricultural land, and sacred places—were confiscated, in addition to numerous undocumented cases especially in distant provinces.²⁰¹ Some court documents ordering confiscation of properties show that the properties were confiscated solely because they were owned by Bahá'ís. In a 1995 court ruling, it was held:

Concerning file number 70/59/263, [regarding] Khodamorad Peyman, son of Bahman, the contents of the file and the report of the Department of Intelligence of Yazd ... indicate that the aforementioned, [who] was a follower of the perverse and Zionist Bahá'í sect, and [whose] children are of the same sect, has passed away. The Court, therefore, is of the view that he has died intestate. In accordance with the blessed law of Imam Khomeini, the Great Leader and the Founder of the Islamic Republic, it is ordered that his properties be confiscated for the benefit of the Yazd Division of the Imam's Executive Headquarters.²⁰²

A Supreme Court ruling from 1988 shows:

According to the file records and evidence therein, the accused membership in the perverse Bahá'í sect and his departure from the country seems apparent. In light of the blessed opinion of Grand Ayatollah Nazari concerning confiscation of assets and properties of Bahá'ís who have fled the country, in the absence of Muslim heirs, all assets left behind are considered bereft of Islamic sanctity; thus, their confiscation to the benefit of the Islamic government is permitted and endorsed.²⁰³

More recent cases of confiscation and demolition of Bahá'í owned properties have been documented by civil society.²⁰⁴ Several interviewees spoke of such confiscations.²⁰⁵ In some instances, material objects—such as religious books, phones, and laptops—have also been confiscated during raids.²⁰⁶

In sum, the persecution of Bahá'ís in Iran since the establishment of the Islamic Republic in 1979 has been characterized by severe and systematic direct violence. This violence has taken many forms,

200 UN Economic and Social Council, *Report of the Special Rapporteur on adequate housing as a component of the right to an adequate standard of living*, Miloon Kothari, UN Doc E/CN.4/2006/41/Add.2 (21 March 2006) 83-84.

201 Ibid.

202 Islamic Revolutionary Courts -Yazd Province, Court file 1559/74/D, Court Order Number 1569/74/D-R, <https://iranbahaipersecution.bic.org/archive/property-deceased-bahai-confiscated-benefit-imams-executive-headquarters>

203 Supreme Court ruling, April 17, 1988, <https://iranbahaipersecution.bic.org/archive/azizollah-mottahedehs-assets-be-seized>

204 E.g. "Baha'is Houses Demolished, One Arrested," *HRANA* (4 August 2022) <https://www.en-hrana.org/bahais-houses-demolished-one-arrested/?hilit-e=baha%27is%20%20https://www.en-hrana.org/isfahan-sentencing-of-two-bahai-citizens-from-imprisonment-to-confiscation-of-property/?hilit=confiscation+baha%27i+property>; Human Rights Watch (2024) 31-36.

205 I-1, I-2, I-13, I-14, I-18, I-20.

206 I-5, I-17, I-19, I-20.

creating an atmosphere of fear and insecurity within the Bahá'í community that persists to this day. In the early years of the regime, unlawful killings were particularly prevalent. Numerous Bahá'ís were executed by the state or fell victim to extrajudicial killings. Many of these executions occurred after grossly unfair trials, while others were carried out with no semblance of legal process whatsoever. Enforced disappearances represent a particularly chilling form of violence. Several cases have been documented where Bahá'ís have vanished after arrest, with authorities providing no information about their fate, leaving families in a state of agonizing uncertainty.

Although the frequency of State-sanctioned killings has decreased since the mid-1980s, the threat of violence remains a constant concern for the Bahá'í community.

Beyond killings, Bahá'ís have faced widespread physical violence. Arbitrary arrests, detentions, and torture have been common experiences for many members of the community. Even children have not been spared, with reports of mistreatment in schools highlighting the pervasive nature of this persecution. The violence extends beyond attacks on individuals to assaults on Bahá'í property and sacred sites. Homes and businesses have been targets of arson and vandalism, often incited by inflammatory rhetoric from clerics.²⁰⁷ Bahá'í cemeteries have been desecrated and demolished, with authorities not only failing to prevent such attacks but sometimes actively participating in them. The violation of burial rights adds a particularly painful dimension to this persecution, denying Bahá'ís dignity even in death. Systematic confiscation of Bahá'í-owned properties has been another form of direct violence, often accompanied by forced evictions and physical threats. Hundreds of properties have been seized, causing significant economic hardship and displacement within the community.

A disturbing aspect of this persecution is the state's role in perpetrating and enabling violence. Authorities have consistently failed to investigate or prosecute crimes against Bahá'ís. In many cases, they have actively hindered investigations and intimidated victims' families, creating a climate of impunity for violence against the Bahá'í community. The impacts of this violence ripple far beyond the immediate victims. Families of those imprisoned or executed have faced ongoing harassment, economic difficulties, and profound psychological trauma. The constant threat of violence has created an atmosphere of fear that permeates all aspects of Bahá'í life in Iran. Despite some changes in the pattern of violence over time, with a decrease in executions since the mid-1980s, other forms of direct violence persist. The systematic nature of this persecution, coupled with the State's failure to protect Bahá'ís, clearly indicates a pattern of religious discrimination and human rights violations against this minority group in Iran.

207 "Iran: Stop ruthless attacks on persecuted Baha'i religious minority," Amnesty International (24 August 2022) <https://www.amnesty.org/en/latest/news/2022/08/iran-stop-ruthless-attacks-on-persecuted-bahai-religious-minority/>

Section 3: Structural violence

Effects of constitutional omission of the Bahá'í faith



In recent years, Iran's treatment of Bahá'ís has evolved from direct violence to what Galtung referred to as 'structural violence'.²⁰⁸ Unlike direct violence, structural violence does not have a clear perpetrator. Instead, structural violence is built into the social, political, and economic systems and shows up as unequal power, resulting in unequal life opportunities.²⁰⁹ This shift towards structural violence was formalised in a 1991 government memorandum, which confirmed a nationwide policy to 'block the development' of the Bahá'í community, especially through economic and educational hurdles.

1991 government memorandum²¹⁰

A. General status of the Bahá'ís within the country's system

1. They will not be expelled from the country without reason.
2. They will not be arrested, imprisoned, or penalized without reason.
3. The government's dealings with them must be in such a way that their progress and development are blocked.

B. Educational and cultural status

1. They can be enrolled in schools provided they have not identified themselves as Bahá'í.

²⁰⁸ Galtung (1969) 171.

²⁰⁹ Yazdani (2018) used the term 'quiet strangulation' to describe the persecution of Bahá'ís in recent years.

²¹⁰ 1991 government memorandum translated in: <https://www.bic.org/sites/default/files/pdf/iran/1991%20Bahai%20Question%20Memo%20ENG.pdf>

2. Preferably, they should be enrolled in schools which have a strong and imposing religious ideology.
3. They must be expelled from universities, either in the admission process or during the course of their studies, once it becomes known that they are Bahá'ís.
4. Their political (espionage) activities must be dealt with according to appropriate government laws and policies, and their religious and propaganda activities should be answered by giving them religious and cultural responses, as well as propaganda.
5. Propaganda institutions (such as the Islamic Propaganda Organization) must establish an independent section to counter the propaganda and religious activities of the Bahá'í.
6. A plan must be devised to confront and destroy their cultural roots outside the country.

C. Legal and social status

1. Permit them a modest livelihood as is available to the general population.
2. To the extent that it does not encourage them to be Bahá'ís, permit them the means for ordinary living in accordance with the general rights given to every Iranian citizen, such as ration booklets, passports, burial certificates, work permits, etc.
3. Deny them employment if they identify themselves as Bahá'ís.
4. Deny them any position of influence, such as in the education sector, etc.

Since the Islamic Revolution, Iran's refusal to recognise the Bahá'í faith as a religion has been formalised in its 1979 Constitution. Article 12 declares the official religion of Iran to be Islam, and Article 13 identifies only Zoroastrianism, Judaism, and Christianity as recognised religious minorities.²¹¹ Article 13 stresses that only those recognised as religious minorities 'are free to perform their religious rites and ceremonies, and to act according to their own canon in matters of personal affairs and religious education'.²¹² This non-recognition of the Bahá'í faith as a religious minority in the constitution has been used as a basis to persecute them, labelling them as a 'political sect' (as discussed in Section 1).²¹³ However, outside of Iran, the Bahá'í faith has been recognised as a religion. States such as Canada, the Netherlands,²¹⁴ and the United States,²¹⁵ as well as United Nations (UN) entities, through numerous resolutions, have affirmed the Bahai's' right to freedom of religion.²¹⁶

211 *Constitution of the Islamic Republic of Iran* (1979, amended in 1989), Article 13, https://www.constituteproject.org/constitution/Iran_1989.pdf?lang=en.

212 Article 18 of the ICCPR guarantees the right to freedom of thought, conscience and religion, including not only 'freedom to have or to adopt a religion' but freedom 'to manifest [this] religion or belief in worship, observance, practice and teaching,' either individually or in community with others. General Comment No. 22 clarifies that freedom to manifest religion encompasses a wide range of acts that are integral to worship, including building places of worship, use of rituals and ceremonial acts, and observance of holidays. (Human Rights Committee, *General Comment No. 22 on Freedom of Thought, Conscience and Religion*, CCPR/C/21/Rev.1/Add.4 (30 July 1993) para 4.)

213 United Nations, *Report submitted by Mr. Abdelfattah Amor, Special Rapporteur, in accordance with Commission on Human Rights resolution 1995/23, E/CN.4/1996/95/Add.2* (9 February 1996) para 56.

214 The Bahá'í is included as one of the religions in *The Netherlands 2022 International Religious Freedom Report*, available at the US Department of State website, <https://www.state.gov/reports/2022-report-on-international-religious-freedom/netherlands#:~:text=In%20a%202021%20survey%2C%20the,as%20Muslim%2C%20and%206%20percent>

215 The United States co-signed with Australia, Brazil, Denmark, Estonia, Israel, Kosovo, Lithuania, The Netherlands, Norway, Slovakia, Sweden, and the United Kingdom the Statement of International Religious Freedom or Belief Alliance (IRFBA) upholding the right of all Bahá'ís to freedom of religion or belief, published at the US Department of State website, <https://www.state.gov/irfba-statement-on-bahais/>. IRFBA is a network of 38 countries committed to advancing freedom of religion or belief around the world (see <https://www.state.gov/international-religious-freedom-or-belief-alliance/>)

216 United Nations General Assembly, *Situation of human rights in the Islamic Republic of Iran, A/C.3/55/L.49* (2 November 2000) para 3(3), 4(h); UNGA *Situation of human rights in the Islamic Republic of Iran, A/C.3/78/L.41* (1 November 2023) para 26.

Various UN resolutions have called upon the government of Iran to eliminate all forms of discrimination based on religious grounds, although they fall short of calling for the recognition of Bahá'í as a religion.

²¹⁷ The Human Rights Committee stresses that

[R]ecognition of a religion as a State religion should not result in any impairment of the enjoyment of any of the rights under the Covenant [International Covenant on Civil and Political Rights], including articles 18 and 27, nor in any discrimination against adherents of other religions or non-believers, since the right to freedom of religion and belief and the prohibition of discrimination do not depend on the recognition as an official religion or belief.²¹⁸

This quote argues that the non-recognition of Bahá'í *per se* does not constitute a violation of the right to freedom of religion; however, the resulting systematic discrimination and abuse that have been carried out with impunity amount to serious breaches of international human rights law, as will be discussed in Section 5.

It is worth noting that regional courts and treaty bodies affirmed in a number of cases that the non-recognition of religion by a government may amount to a violation of international law. The European Court of Human Rights (ECtHR), in *Metropolitan Church of Bessarabia and Others v. Moldova*, ruled that the government's refusal to recognise a religion constitutes an interference with the right to freedom of religion.²¹⁹ The Court explained that '[t]he right of believers to freedom of religion, which includes the right to manifest one's religion in community with others, encompasses the expectation that believers will be allowed to associate freely, without arbitrary State intervention'. Without a religion being recognized, its followers cannot freely operate – since unrecognized religions lack legal personality, followers 'cannot bring legal proceedings to protect [their] assets, which are indispensable for worship,' and they are not 'able to defend themselves against acts of intimidation'.²²⁰ The ECtHR reiterated its ruling in *Jehovah's Witnesses of Moscow and Others v. Russia*.²²¹ The Human Rights Committee made a similar ruling in *Malakhovsky and Pikul v. Belarus*, stating that the refusal to register a religious association and the consequent impossibility of carrying out activities which are essential to the practice of such religion, amounted to a restriction of their right to manifest their religion and therefore a violation of article 18 of the ICCPR.²²²

²¹⁷ UNGA, *Situation of human rights in the Islamic Republic of Iran*, A/C.3/55/L.49 (2 November 2000) para 3, 4(g); UNGA, *Report of the Secretary-General on the situation of human rights in the Islamic Republic of Iran*, A/63/459 (2008) para 55, 60, 78; UNGA, *Situation of human rights in the Islamic Republic of Iran*, A/C.3/65/L.49 (29 October 2010) para 2(h), 4(g); UNGA, *Situation of human rights in the Islamic Republic of Iran*, A/C.3/66/L.56 (27 October 2011) para 2, 6(g), 6(h); UN Human Rights Council, *Interim report of the Secretary-General on the situation of human rights in Iran*, A/HRC/16/75 (14 March 2011) para 25; UN Human Rights Council, *Report of the Secretary-General on the situation of human rights in the Islamic Republic of Iran*, A/HRC/19/82 (20 March 2012) para 23; UNGA, 71/204. *Situation of human rights in the Islamic Republic of Iran* A/RES/71/204 (1 February 2017) para 16; UNGA, *Situation of human rights in the Islamic Republic of Iran*, A/C.3/78/L.41 (1 November 2023) para 26, 27.

²¹⁸ Human Rights Committee, *Consideration of Reports Submitted By States Parties Under Article 40 Of The Covenant*, CCPR/C/79/Add.25 (3 August 1993) para 22.

²¹⁹ *Metropolitan Church of Bessarabia and Others v. Moldova*, ECtHR Application no. 45701/99, Judgment 13 December 2001, para 118.

²²⁰ *Ibid* para 129-130.

²²¹ *Jehovah's Witnesses of Moscow and Others v. Russia*, ECtHR Application no. 302/02, Judgment of 10 June 2010, para 101.

²²² *Malakhovsky and Pikul v. Belarus*, Human Rights Committee Communication No. 1207/2003, CCPR/C/84/D/1207/2003, 23 August 2005.

In practice, the omission of the Bahá'í faith in the constitution denies Bahá'ís' legal recognition and protection under Iranian law.²²³ As a result, they are barred from establishing official institutions, and are unable to freely practice their faith, such as holding public ceremonies or disseminating religious materials.²²⁴ This constitutional framework has been used to justify systematic discrimination and persecution against Bahá'ís, including denial of access to higher education, restrictions on employment, confiscation of property, and even imprisonment or execution of community leaders. Ghanea remarks that the extent of discrimination against Bahá'ís 'is quite staggering':

Not only was the persecution government instigated, but it has been perpetuated and has deepened over 36 years, permeating laws and policies: constitutional, educational, civil service, employment, administrative law, family law, inheritance, labour market, military, criminal law, burial, health law, press law, prison law, intelligence and the judiciary, etc.²²⁵

For example, In May 2011, a judge in the revolutionary court of Amol in Mazandaran province ruled that attendance at Bahá'í *ziyafats* (community gatherings and prayers) constituted 'propaganda against the state'. This decision referenced the Prosecutor General's 2008 statement that outlawed Bahá'í institutions.²²⁶ Several interviewees spoke about their experiences being arrested and imprisoned, or such experiences of close family members.²²⁷ Notable among these is one interviewee's account of their 13-year-old child being reprimanded by State authorities for allegedly promoting the Bahá'í faith at school, demonstrating the extent to which the Bahá'í faith is censured and policed in all levels of Iranian society:

The principal of [my child's] school called me. She told me that someone from the Ministry of Intelligence has come to take [my child] away for detention...I was scared, and rushed to the school where I met an intelligence officer. He claimed that [my child] was promoting Bahá'í teaching[s] to [another child]...I knew [my child] wasn't lying, but the officer insisted on investigating. After checking the school's camera, it turns out that another student asked [my child] why [they] weren't attending [the] Islamic prayer meeting. [My child] had simply explained that [they] were of a different religion and that [they] were a Bahá'í.²²⁸

The lack of constitutional recognition has made it challenging for Bahá'ís to seek legal recourse against violations of their human rights and has contributed to their status as an unprotected and often persecuted religious minority in Iran. For instance, some interviewees shared stories of family

223 *Constitution of the Islamic Republic of Iran* (1979, amended in 1989), Article 13, https://www.constituteproject.org/constitution/Iran_1989.pdf?lang=en.

224 Human Rights Watch (2024) 39.

225 Nazila Ghanea, "Driving while Bahá'í: A Typology of Religious Discrimination," *The Equal Rights Review* volume 14 (Martinus Nijhoff Publishers, 2015) 58. (citations omitted)

226 Human Rights Watch (2024).

227 I-1, I-5, I-10, I-12, I-13, I-14, I-15, I-16, I-17, I-19, I-20.

228 I-21.

members being subjected to legal processes without legal representation.²²⁹ Another recalled Bahá'ís being blacklisted from entering a courthouse.²³⁰ Many spoke of arbitrary court processes.²³¹

They went through a trial in a sense, but the trial was very, very skewed...It was just [the defendant] himself as well as his lawyer that the judge had [told], 'as long as you are a Bahá'í, I'm going to sentence you to prison no matter what'.²³²

The court session was very quick. [The judge] asked me just three questions. The first question: 'are you Bahá'í or not?' I said 'yes'. The second question: 'did you participate in Bahá'í Feast?' I said 'yes'. [The third question]: 'did you teach the Bahá'í things?' I said 'no'... So that was the three questions and that's it. About 15 minutes without any evidence. Just my confessions.²³³

[The trial] was like another interrogation, to be honest. He was shouting. He was insulting...He wasn't a judge that listened. He was interrogating me, and he was insulting me and my belief all the time. And he didn't let my lawyer talk.²³⁴

Alongside legal persecution, the State has curated a system of policies that maintain an economic chokehold on the Bahá'í community. Bahá'ís have been dismissed from public sector employment, while private businesses employing Bahá'ís have been interrogated and harassed into dismissing them. During the 1980s, in addition to dismissal from the civil service, the government also ordered those Bahá'ís who were dismissed to repay in full the salary that they had received during the entire time that they had worked, or face imprisonment.²³⁵ Bahá'í owned businesses became targets of boycotts, looting, confiscations, and forced closures, including by a refusal of licenses, withholding of supplies, or eviction from premises.²³⁶ Several interviewees shared anecdotes of family members being expelled from employment or having their businesses shut down.²³⁷

Since 2020, Bahá'ís have been required to identify themselves as belonging to one of the four constitutionally recognised religions in order to obtain a national identification card.²³⁸ Not having an identity card leads to issues obtaining passports, drivers' licenses, and credit cards.²³⁹ A similar requirement has restricted Bahá'ís from registering their marriages since 2023, with flow on effects for the registration of births, divorces, and inheritance. Courts have also refused to grant inheritance to Bahá'ís.²⁴⁰

229 I-13, I-20.

230 I-16.

231 I-13.

232 I-10.

233 I-15.

234 I-5.

235 Ghanea-Hercock (2003) 103.

236 Yazdani (2018) 13-15.

237 I-2, I-6, I-14.

238 Human Rights Watch (2024).

239 Leah Carter, "ID card law in Iran highlights plight of Baha'i," *DW* (25 January 2020) <https://www.dw.com/en/iran-id-card-rule-highlights-plight-of-bahai/a-52149974>

240 Human Rights Watch, 2024.

Education: systematic indoctrination and exclusion

Bahá'ís in Iran face a paradoxical situation in the education system, in which they are simultaneously subjected to indoctrination and exclusion. Students may be required to attend Islamic religious classes that contradict their beliefs, and face pressure to conform or hide their religious identity. However, while being subjected to this anti-Bahá'í indoctrination, they are also systematically excluded from various aspects of education. This exclusion reaches its peak in higher education, designed to halt their academic advancement and prevent them from achieving prominence in their chosen fields. Bahá'ís are routinely denied access to universities. Bahá'í students may face expulsion if their faith is discovered, and the community is prohibited from establishing its own educational institutions. This dual approach of indoctrination and exclusion serves to discourage adherence to the Bahá'í faith while limiting educational and professional opportunities for Bahá'ís, creating a challenging environment where they are exposed to negative propaganda about their own religion while being denied full participation in the educational system.

Indoctrination through education

Bahá'ís are routinely subjected to Islamic indoctrination via the education system. In 2021, leaked documents indicate an expansion—or at least reinforcing—of the 1991 policy: the contents of an official Iranian directive instructed local authorities in the city of Sari to require teachers to identify Bahá'í students and 'bring them back' to Islam.²⁴¹ Several interviewees reported being compelled to partake in compulsory Muslim prayers, including in instances where they expressly requested to be excused.²⁴² Others recalled being summoned to the principal's office on account of their faith, either being threatened or quizzed about Islam.²⁴³ Some interviewees recalled instances of being proselytized:

Multiple times, I had clerics who came to my school. They had asked the principal to have a meeting with us... And that is literally when I was like 10, 12 [years' old], [to] try to 'guide me and convert me'... [T]hey were hoping that they could, in their mind, 'help me' to come to the right path.²⁴⁴

[The] teacher pulls my brother, my cousin, and my brother's friend—three Bahá'í kids in that school—aside and then sets up a meeting with them. And then he pretty much tries to persuade them away from the Bahá'í faith, saying things like, 'your parents are wrong, they don't know what they're talking about. You can convert to Islam anytime. You should do it now to walk the straight path. The correct path is not too late' ...And then he brings, a religious leader from the community to talk to them as well, [to] say the same things, like 'your parents are lying to you'.²⁴⁵

241 "Iran: Leaked document reveals plans to intensify suppression of Baha'is and other religious minorities," *FIDH* (9 March 2021) <https://www.fidh.org/en/region/asia/iran/iran-leaked-document-reveals-plans-to-intensify-suppression-of-baha>; "Exposed: Sinister plan by Iranian authorities to monitor and suppress Baha'is," *Bahá'í International Community* (10 March 2021) <https://www.bic.org/news/exposed-sinister-plan-iranian-authorities-monitor-and-suppress-bahais>

242 I-1, I-4, I-11, I-12, I-19, I-20.

243 I-6, I-12.

244 I-10.

245 I-8.

One doctrine of the clerics was that ‘the children, we have to convert, so you always protect the children as much as you can. Try to convert them.’ Because they knew the Bahá'ís don't teach their children a particular belief system, you know, because you're not a Bahá'í until you choose to become one.²⁴⁶

As these interviews clearly show, Bahá'í students continuously face pressure via the education system to conform to Islamic practices or to denounce their faith. At the same time, however, Bahá'í students also face exclusion from education for their nonconformity.

Exclusion from education

Since the Revolution, Bahá'í students have been—and continue to be—expelled from schools in Iran. Recent reported examples include:

On November 9, 2019, the Human Rights Activists News Agency (HRANA) reported that authorities at al-Zahra girls' high school in Sari expelled a student after she responded to her religious teacher's offensive comments about Bahá'ís. On July 12, 2020, a Bahá'í father told the Center for Human Rights in Iran that his 15-year-old son was expelled from the Salam Alborz high school for being a Bahá'í. On September 11, 2019, Mohsen Haji Mirzai, the Minister of Education at the time told reporters that ‘if a student declares that he or she is a follower of an unrecognized religion and that act is considered proselytizing, their education is prohibited’.²⁴⁷

Our interviewees shared similar stories:

My brother was at secondary school, and he was continuously, essentially, kicked out from school to school. He was suspended. And I don't know the exact amount and number of schools, but I think at least four [that] he was suspended from for being a Bahá'í, or for at least being part of the Bahá'í family... So he was always [an] outcast... And I think that then also caused him to have a lot of problems with not being able to have many friends.²⁴⁸

I wasn't actively ever expressing my religion... Just if anybody asked, I would answer the questions. I never lied about my faith, but I... wasn't proactive about it... Because I knew that I might be expelled from the school if I was accused of spreading the teachings of the Bahá'í faith or sharing the teachings of the Bahá'í faith.²⁴⁹

One interviewee shared stories of how each of their children was refused entry to various primary and

246 I-6.

247 Human Right Watch (2024).

248 I-4.

249 I-5.

secondary schools on account of their faith.²⁵⁰ Another recalled an anecdote where the principal at their school had encouraged their mother to lie about their religion to allow them a better education:

Our principal at the elementary school [would] always tell [my mother], 'you know, what's wrong with you. Just say that you guys are Muslims on the form so your kids could go to a better school.' And she'd tell them, 'No, I can't lie. You know, this is who we are.' And... he would tell my mom, 'No, you're ruining your children's future'.²⁵¹

Other interviewees, though permitted to continue their studies, experienced barriers to take part in certain activities on account of their faith, such as participating in national and international competitions,²⁵² performing music for the school,²⁵³ and receiving awards.²⁵⁴

True to the stipulations in the 1991 government memorandum, discussed above, Bahá'ís are systematically denied access to tertiary education. Some are refused admission to universities, while others are registered for degree programmes but subsequently expelled upon discovery of their Bahá'í faith.²⁵⁵ Several interviewees spoke to us about being rejected from university,²⁵⁶ or being expelled.²⁵⁷

[My brother] passed the entrance exam and was admitted to [XXX] University, but after just two weeks, the University Director verbally informed [him] that he would be expelled due to his Bahá'í affiliation. My brother requested a written expulsion letter, but the director said they... are not allowed to provide one. As for me, I never obtained permission to enter Iran's official universities.²⁵⁸

My cousin... was let into a university somehow. And she packed up everything, sold all of her stuff, moved to this new city to start university ... But on her first day of class, they pulled her to the side and [said], 'you're a Bahá'í. How did you even end up here? You're not allowed to be here' ... And on the first day, she was expelled from that university.²⁵⁹

I think my expulsion from the university and the fact that I gave up my dearest thing—my [university] studies—very strongly affected my identity as a Bahá'í.²⁶⁰

Some interviewees shared their efforts to challenge the authorities about their university rejection,

250 I-18.

251 I-12.

252 I-1, I-17.

253 I-8.

254 I-11.

255 "Bahá'is Banned from Higher Education in Iran," *HRANA* (17 August 2022)

<https://www.en-hrana.org/bahais-banned-from-higher-education-in-iran/>; <https://iranwire.com/en/features/64351/>; I-9.

256 I-7, I-14, I-21.

257 I-5, I-8, I-9, I-10, I-11.

258 I-11.

259 I-8.

260 I-9.

recalling being repeatedly dismissed.²⁶¹ In 2018, a Bahá'í student's complaint was dismissed by Branch 40 of the Court of Administrative Justice; the student had been accepted to a university but was barred from registering and selecting courses due to his 'religious minority' status.²⁶² The court deemed this action lawful, citing the 1991 ISRCC memorandum (referred to as the '1991 government memorandum' in this section). On June 10, 2019, Branch 16 of the administrative justice court of appeal affirmed this ruling.²⁶³

In response to this, the Iranian Bahá'í community established the Bahá'í Institute for Higher Education (BIHE) in 1987.²⁶⁴ Many interviewees had studied at BIHE, or had family members that had.²⁶⁵ Classes are typically taught in private locations, such as Bahá'í homes and basements, and more recently via online platforms.²⁶⁶ However, studying at BIHE is not a simple endeavour, with State authorities repeatedly interfering with BIHE and those associated with it. In 2011, the homes of several BIHE instructors were raided, and the instructors were subsequently arrested and convicted for their affiliation with BIHE.²⁶⁷ One interviewee, a teaching assistant at the time of the raid, recalled feeling unsafe and spending a few weeks away from home to hide.²⁶⁸ Another told us about threats received while working as a teaching assistant:

After completing my studies, I assisted my former teacher as a teaching assistant... However, I received threatening letters from unknown individuals identifying themselves as Soldiers of Imam Mahdi or Imam Zaman. One letter dropped at our house warned that they knew I was cooperating with the Bahá'í University of Iran and would continue to threaten us until the execution of the last Bahá'í in Iran. And during that time, I was chased several times in the streets and subjected to frightening comments about Bahá'ís.²⁶⁹

Some interviewees reported legal repercussions for involvement with BIHE.²⁷⁰ One interviewee recalled their classes being relocated after authorities pressured a landlord not to continue leasing a classroom to BIHE, and the State subsequently propagandizing the incident:

[We] had classes in [an] actual classroom. But after that, [the authorities] put pressure on the landlord [and] they kicked the Bahá'ís out...Typically, of course, BIHE cannot own a building – if they do, [the authorities] will confiscate it. [But] whenever [BIHE] rents, [the authorities] will put pressure on the landlord...They forced the Bahá'ís to evacuate, even

261 I-7.

262 Human Right Watch (2024).

263 Ibid.

264 "The History and an Overview of BIHE," *BIHE*, <https://www.bihe.org/about/history>

265 I-1, I-2, I-5, I-7, I-8, I-10, I-11, I-14, I-7.

266 "The History and an Overview of BIHE," *BIHE*, <https://www.bihe.org/about/history>

267 "Baha'i educational programme targeted in raids," *BWNS* (22 May 2011) <https://news.bahai.org/story/825/>; <https://iranwire.com/en/bahais-of-iran/115070-you-will-not-be-admitted-to-university-you-are-bahais/>; <https://iranwire.com/en/bahais-of-iran/115064-Bábak-beheshti-a-bahai-educator-who-overcame-the-denial-of-education/>

268 I-7.

269 I-11.

270 I-8, I-17.

though I think we had a year-long contract. But they kicked us out after six months...And then I remember in one of the Iranian newspapers or news agencies online, they posted this article that [said]: 'Bahá'ís are having this centre for... crazy education. They're... a spy nest for Israel or Western powers. We were able to... knock them down.' So that's how they are typically talk about Bahá'ís.²⁷¹

Authorities have also intruded upon and disrupted BIHE classes. For example, in February 2024, agents of the Ministry of Intelligence raided a private home during a BIHE exam, interrogating and insulting the students and confiscating their study materials, as well as beating one of the students.²⁷² An interviewee recalled that students would enter classes 'one by one, not ten at a time' to avoid alerting the authorities or drawing attention.²⁷³ The same interviewee also recalled instances where the authorities restricted access to online BIHE education platforms:²⁷⁴

[My wife and I] felt insecure, especially when we were students at BIHE. We took turns going to Tehran... to attend the student classes. One person went to class and the other took care of the children, and we shared what we learned with each other. Classes were raided by government forces every once in a while, and teachers or students were arrested every time...²⁷⁵

A BIHE instructor spoke of the educational disruptions experienced by their students whose home was raided during an exam, as well as students who were arrested.²⁷⁶ Another instructor spoke us of the precarity of studying at the underground university, recalling an instance where their students were sitting an exam while unrest was occurring outside.²⁷⁷

Studying at BIHE comes with additional barriers: some interviewees recalled limited resources and facilities,²⁷⁸ while another recalled commuting for 12 hours at a time to attend BIHE classes in Tehran, sometimes missing classes entirely due to traffic delays.²⁷⁹ One interviewee spoke of the difficulties attaining employment in Iran with a BIHE qualification:

I started to look for a job and I would go to interviews. They would ask me [which university I studied at].

BIHE.

271 I-7.

272 "Iranian agents beat Baha'i youth during attack on educational group—and knowledge itself," *Bahá'í International Community* (16 February 2024) <https://www.bic.org/news/iranian-agents-beat-bahai-youth-during-attack-educational-group-and-knowledge-itself>

273 I-7.

274 I-7.

275 I-21.

276 I-7.

277 I-33.

278 I-7, I-11, I-33.

279 I-2,

What does that stand for?

Bahá'í [Institute for Higher Education].

Oh, okay.

You can see that the body language [would change] and you know that you have no chance. They will start asking you questions: they would either flirt with you or just trash you.²⁸⁰

Finally, several interviewees shared that the desire to pursue higher education was the decisive factor that ultimately prompted them to leave Iran.²⁸¹

The whole reason we moved out wasn't because of an imminent danger that was taking place. It was more to do with my mum and dad were very, very keen on making sure that both me and my brother were able to get a higher education. They wanted us to be able to thrive in life and succeed.²⁸²

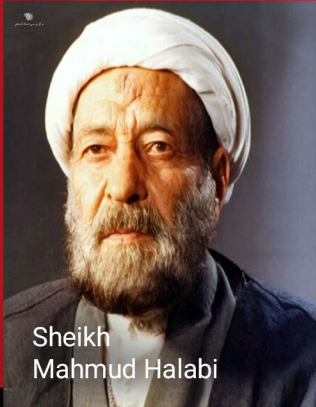
In sum, this section explored the structural violence faced by Bahá'ís in Iran, focusing on the effects of their constitutional omission and the systematic discrimination in education. The 1991 government memorandum formalised policies to block the development of the Bahá'í community, particularly through economic and educational restrictions. Bahá'ís are denied legal recognition, face challenges in employment, and experience difficulties with basic civil rights such as obtaining identification cards or registering marriages. In educational settings, Bahá'ís face a paradoxical situation of simultaneous indoctrination and exclusion.

280 I-14.

281 I-1, I-4, I-12, I-18, I-20.

282 I-4.

Some of the Key Figures in the Systematic Persecution and Execution of Baha'is in Iran



Sheikh Mahmud Halabi



Hojatoleslam Hossein Mousavi Tabrizi



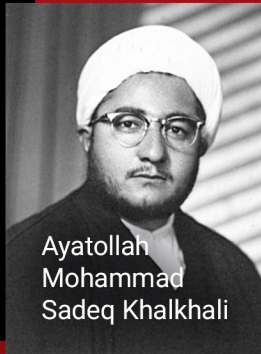
Mohammad Ali Rajai



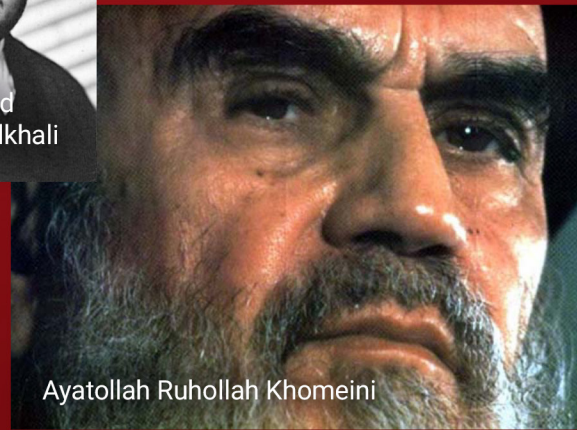
Sheikh Mostafa Rahnama



Ayatollah Seyyed Ali Khamenei



Ayatollah Mohammad Sadeq Khalkhali



Ayatollah Ruhollah Khomeini



Hojatoleslam Ebrahim Raisi



Asadollah Lajevardi



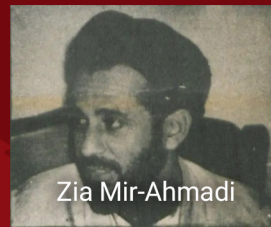
Hojjatoleslam Qazai



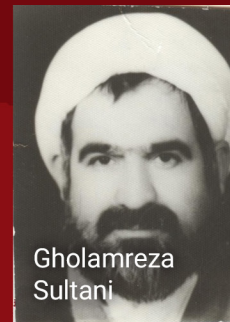
Mohammad Mohammadi Gilani



Alireza Qasemzadeh Hosseini
علیرضا قاسم زاده حسینی
طلوعی



Zia Mir-Ahmadi



Gholamreza Sultani

Section 4: Cultural violence

Anti-Bahá'í narrative: the State, clerics, and media



Ayatollah Khomeini in his speech in 1964 stated:

I shall destroy them [Bahá'ís] one day. I do not want to create disturbances. If you [the authorities] do not want to have trouble, you should destroy them yourself... The way to ameliorate the country is to correct its culture. The correction must start with the culture. The hands of imperialism are very active in our culture. They do not let our youth grow up to be independent; they do not let our youth at the universities develop correctly. They do something to them from childhood so that when they grow up, Islam means nothing to them and they [the West] mean everything.²⁸³

The State has, particularly since the revolution in 1979, systematically sought to create an anti-Bahá'í *culture* by propounding propaganda and misinformation that demonises the Bahá'í community.²⁸⁴ Official statements, the religious establishment, State-controlled media, and schools demonstrate State efforts to poison public minds against the Bahá'í community. In other words, these examples

283 Ruhollah Khomeini, *Sahifeh-yei Imam*, Volume One, p 395 (The Institute for Compilation and Publication of Imam Khomeini's Works (International Affairs Department), 2008, 352.<http://staticsml.imam-khomeini.ir/en/File/NewsAttachment/2014/1695-Sahifeh-ye%20Imam-Vol%201.pdf>

284 Yazdani (2018) 161.

of cultural violence represent an attempted normalization of the State's direct and structural violence upon them. As Warburg explains:

[t]he [Bahá'í] minority is stereotyped in negative terms, utilising existing, more or less diffuse, prejudices among the majority population, and the persecutions are justified by reference to the imaginary threats posed by such potentially subversive elements.²⁸⁵

There are several recurring themes in the State's anti-Bahá'í propaganda, including that Bahá'ís are a threat to Islam, are a 'misguided sect' rather than a religion, are agents or spies of Israel or Western powers, and engage in morally corrupt practices, such as incest and sexual liberty.²⁸⁶ In 2010, Ayatollah Gholam Ali Na'imabadi—Bandar Abbas Friday Sermon Imam and Representative of the Leader in Hormozgan Province—referred to Bahá'ís as 'germs'.²⁸⁷ Such stereotypes and misinformation have been perpetuated in official discourse such as speeches and statements, and go to the highest level: in 2010, then-Supreme Leader Ayatollah Ali Khamenei gave a broadcast and widely publicized speech where he designated Bahá'ís as 'enemies of the Islamic Revolution'.²⁸⁸ Supreme Leaders Khomeini and Khamenei also issued several *fatwas* (religious decrees) characterizing Bahá'ís as 'infidels', '*najis [unclean]*', and enemies of Islam that are to be avoided. Other examples include:

All believers must counteract the tricks and corruptions of the perverse Bahá'í sect and prevent others from deviating and joining them.²⁸⁹

Any association or dealing with this perverse and mischievous sect should be avoided.²⁹⁰

Worth noting is the sheer volume of such discourse: for instance, in a single month in 2016, some 169 political, judicial, and religious leaders allegedly spoke or wrote against the Bahá'í community.²⁹¹

Similar rhetoric has been perpetuated by the religious establishment—which is intimately linked to the State—with clerics issuing *fatwas* denouncing the Bahá'í faith:

Bahá'ís are not counted amongst the religious minorities.²⁹²

Any kind of dealing and connection with this perverted sect is forbidden.²⁹³

285 Warburg (2012) 214.

286 Bahá'í International Community, *Inciting Hatred: Iran's media campaign to demonize Bahá'ís* (2011) 10.

287 "Ayatollah Na'im Abadi's Anti Baha'i Friday Sermon And Its Deadly Consequences," *Abdorrahman Boroumand Foundation* (12 August 2010), available from <https://www.iranrights.org/library/document/2770>

288 Bahá'í International Community (2011) 7-8.

289 "Adyannet: Fatwas of Ayatollah Khamenei against Baha'ism," *Archives of Baha'i Persecution in Iran* (6 February 2016) https://iranbahaipersecution.bic.org/archive/adyannet-fatwas-ayatollah-khamenei-against-bahaism#_ftn3

290 "Fatwa of Ayatollah Khamenei about socialising with Baha'is," *Archives of Baha'i Persecution in Iran* (26 March 2018) <https://iranbahaipersecution.bic.org/archive/fatwa-ayatollah-khamenei-about-socialising-bahais>

291 "Iran: Most recent backlash against Baha'is exposes authorities' extreme intolerance for religious minority group - The Baha'is in Iran," *UN OHCHR* (8 June 2016) <https://www.ohchr.org/en/press-releases/2016/06/iran-most-recent-backlash-against-bahais-exposes-authorities-extreme>

292 "Adyannet: Fatwas of Ayatollah Noori Hamedani against Baha'ism," *Archives of Baha'i Persecution in Iran* (7 March 2016) <https://iranbahaipersecution.bic.org/archive/adyannet-fatwas-ayatollah-noori-hamedani-against-bahaism>

293 Ibid.

The Bahá'í faith is not a religion, but a political faction that has the appearance of religion. It was first founded by the Russian government and then developed by the British government, and now is handled by the United States [of America].²⁹⁴

Religious leaders also pervade such rhetoric in sermons,²⁹⁵ and have on occasion explicitly incited violence against Bahá'ís.²⁹⁶ One interviewee noted:

There was a mosque about 300 meter from where I lived, and very regularly in that mosque they would preach incendiary teachings against the Bahá'ís and the Bahá'í faith. Sometimes after the congregation in mosque, those neighbours would come out and they would have a march in our street, in our neighbourhood shouting all sort of threatening statements against the Bahá'ís. Sometimes they would throw stones. I remember actually once, maybe it was 9 or 10 pm at night, some of the stones hit the window in my bedroom and it broke, and I was really scared.²⁹⁷

However, the staunch anti-Bahá'í position of the religious establishment has occasionally been fractured by dissident clerics—such as Grand Ayatollah Hossein Ali Montazeri, who in 2008 issued a *fatwa* recognizing the citizenship rights of Bahá'í. Likewise, in 2014, Hujjat al-Islam Mohammad Taghi Fazel Meybodi published an essay calling Bahá'ís 'pure' and possessing of equal citizenship rights.²⁹⁸ That same year, Ayatollah Abdol-Hamid Masoumi-Tehrani gifted the Bahá'í community an artwork as 'an enduring symbol of respect for the innate dignity of human beings':

I present this precious symbol—an expression of sympathy and care from me and on behalf of all my open-minded fellow citizens who respect others for their humanity and not for their religion or way of worship—to all the Bahá'ís of the world, particularly to the Bahá'í of Iran who have suffered in manifold ways as a result of blind religious prejudice.²⁹⁹

Anti-Bahá'í propaganda is routinely adopted in State-controlled media—and increasingly on social media.³⁰⁰ According to Ghanea, government resources dedicated to anti-Bahá'í propaganda over the years — including civil servants and cyber hackers/attackers paid for by government funds exclusively to attack Bahá'ís—are no doubt 'astounding'.³⁰¹ Recent years have seen a significant uptick in such

294 "Tabnak: Ayatollah Sobhani's fatwa on Baha'ism," *Archives of Baha'i Persecution in Iran* (6 December 2018) <https://iranbahaipersecution.bic.org/index.php/archive/tabnak-ayatollah-sobhanis-fatwa-bahaism>

295 "The Bahá'ís of Semnan - A Case Study in Religious Hatred Incitement to Hatred," *Bahá'í World News Service*, <https://news.bahai.org/human-rights/iran/semnan/incitement-hatred>; "Iran: Most recent backlash against Baha'is exposes authorities' extreme intolerance for religious minority group - The Baha'is in Iran," *UN OHCHR* (8 June 2016) <https://www.ohchr.org/en/press-releases/2016/06/iran-most-recent-backlash-against-bahais-exposes-authorities-extreme>

296 1-2.

297 1-20.

298 "Bahá'ís are Pure," *Iran Press Watch* (8 May 2014) <https://iranpresswatch.org/post/9898/>

299 Translation from Persian, available at http://dl.bahai.org/bwns/assets/documentlibrary/987_website-statement-translation-en.pdf

300 For a more comprehensive overview, refer to https://www.bic.org/sites/default/files/pdf/inciting-hatred-book_0.pdf

301 Ghanea (2015) 59.

materials, with the Bahá'í International Community in 2021 recording a significant expansion in such efforts.³⁰² During 2017-2021, more than 33,000 pieces of anti-Bahá'í content were published or broadcast via various media channels.³⁰³ In addition to the demonization and dehumanization of the Bahá'í faith illustrated above, new narratives have emerged, for example, blaming Bahá'ís for the spread of COVID-19 and Iran's economic decline.³⁰⁴ In 2023, a social media campaign under the hashtag #Amir_Kabir-Thankyou (ریبک_ریما (میرکشتم) incited violence against and killing of Bahá'ís.³⁰⁵



Meeting of the Islamic Propagation Office officials with the Spiritual Leader, 18 January 2023.

Seminars propagating hate are also held—such as in 2021-2022, when the Islamic Propagation Office hosted workshops in Shiraz and Karaj, where participants were asked to design anti-Bahá'í posters and artworks.³⁰⁶ In sum, digital media, posters, pamphlets, and polemics promoting anti-Bahá'í sentiments are routinely published and disseminated.³⁰⁷



1985 Religious studies book for fifth graders.

Cultural violence in schools

To quote Parson Talcott, education viewed as a 'focal socialising agency' acts as a link between the family and society, where students are taught societal norms and values.³⁰⁸ What students learn from teachers and textbooks and absorb from fellow students contribute to the cultural understanding of the Bahá'í faith as well as the cultural violence perpetrated at school.

Some interviewees reported that the Bahá'í faith is featured in school textbooks and discussed as part of the formal

302 "A machinery of hate: increasing propaganda raises concern for Bahá'ís," *Bahá'í International Community* (8 July 2021), <https://www.bic.org/news/machinery-hate-increasing-propaganda-raises-concern-bahais>

303 "State-sponsored hate propaganda against Iranian Bahá'ís," *Bahá'í Community of Canada*, <https://opa.bahai.ca/areas-focus/situation-iran/propaganda/>

304 "2022 Report on International Religious Freedom: Iran," *US Department of State*, <https://www.state.gov/reports/2022-report-on-international-religious-freedom/iran/>

305 Human Rights Watch (2024).

306 Human Rights Watch (2024).

307 "Threatening anti-Baha'i posters distributed in Yazd, Iran," *BWNS* (18 June 2014) <https://news.bahai.org/story/1010/>; "Extensive Distribution of Anti-Baha'i Pamphlets in Mazandaran Province," *Iran Press Watch* (22 June 2017) <https://iranpresswatch.org/post/17744/extensive-distribution-anti-bahai-pamphlets-mazandaran-province/>

308 Parsons Talcott, "The School Class As A Social System: Some of Its Functions in American Society," *Harvard Educational Review* volume 29 (1959) 297-318.

curriculum,³⁰⁹ often in an incendiary or inaccurate manner.³¹⁰ Anti-Bahá'í publications have also been reportedly available in school libraries,³¹¹ as well as distributed to students.³¹² Many interviewees—who attended school during the 1990s and 2000s—reported teachers making derogatory comments and insults about the Bahá'í faith, particularly in religious studies and history classes.³¹³ Similar to the State narrative discussed above, teachers would refer to Bahá'í as *najis* (unclean), infidels, and spies for Israel, and to Bahá'ísm as a cult rather than a religion.³¹⁴ They would also disseminate stereotypes, such as that Bahá'ís should not be trusted or socialized with, that Bahá'ís engage in incestuous relations, that Bahá'í gatherings are in fact sex parties, and that Bahá'ís have tails and hooves.³¹⁵ Responding to a teacher's offensive comments or speaking out in defence of Bahá'í gatherings runs the risk of being expelled.³¹⁶ One interviewee explained that:

The religious studies teacher in Iran played a significant role in creating a divide between Bahá'í and Muslim children. They aim to instil hatred and fear in Muslim students, discouraging any interaction with Bahá'ís. Teachers would warn Muslim children not to associate with Bahá'ís, read their books or visit their homes, suggesting that such a connection could harm their future prospects, including university admission. This effort was part of a broader plan to foster mistrust and separation from an early age.³¹⁷

Some interviewees reported instances of humiliation, where teachers would berate or direct anti-Bahá'í slurs towards them.³¹⁸ One recalled an incident where a teacher had asked for a pen; when her child offered a pen to the teacher, the offer was refused because the child was 'dirty'.³¹⁹ Other stories of experiences in schools include:

I remember when I was in the third grade, our religious teacher came to the class and started talking about how Bahá'ísm is a heretical sect and those who deviate are infidels and so on. They are all going to hell and burn. And then he pointed at me and told all the children that this is an example: when she dies, she will go to hell and burn in fire.³²⁰

In middle school... we had an Arabic teacher who was very prejudiced. It was me and another guy in the class who were Bahá'ís. And even if you wanted to go up to his desk to talk to him, he would cover his mouth or say, 'hey, stay back, don't get close to me'.³²¹

When I reached the age of nine, they forced me and a couple of my Bahá'í friends

309 I-2, I-5, I-10, I-14, I-20.

310 Human Rights Watch (2024).

311 I-9.

312 I-8, I-20.

313 I-1, I-2, I-10, I-16, I-17, I-18, I-20; Human Rights Watch (2024).

314 I-11, I-19.

315 I-1, I-14, I-16, I-18.

316 Human Rights Watch (2024).

317 I-21

318 I-11, I-14

319 I-18.

320 I-31 (Azadeh)

321 I-12.

to attend the congregational prayer. I remember once refusing to attend a prayer by explaining that I was not Muslim, and the head teacher told me that Bahá'í is not a religion, but a cult, and that its followers are impure and infidels. She then... instructed all my classmates not to interact with me in any ways. As punishment, she forced me to stand in the corner of our schoolyard for quite a long time.³²²



One teacher... would question Bahá'í beliefs... would question the basis of my belief, would mock or criticise certain Bahá'í ideas, would in public question and humiliate me saying that this is a man-made religion, it's not divine, that we don't have any laws, we don't pray or fast, we don't believe in God... all sorts of things that he would know would incite that hatred, I think, among other classmates.³²³

Others reported tacit violence from teachers—such as being ignored, excluded, or treated differently to other students.³²⁴ One interviewee reported feeling 'invisible', recalling an incident where, after being ignored when raising her hand to request permission to go to the bathroom, she wet herself.³²⁵

Some of the school teaching staff and management staff were okay and fair, but most of them were adversely biased toward me and the other students at both primary school and the high school. They used to treat us with hatred and discrimination. This hatred was sometimes obvious so that they would speak offensively and with disapproval of us in the class. Some other time it wasn't so obvious. For example, some teachers would purposefully mark my exams or assignments lower than what I deserved.³²⁶

This is not, however, a universal reality: several interviewees reported having specific teachers who were more relaxed and accepting of the Bahá'í faith and Bahá'í students. For instance, some interviewees were exempted from congregational prayers:³²⁷

My son's' religious teacher at school talked badly about the Bahá'í, saying they were very bad people and warned the students not to befriend them... I was very upset and went to the school to talk to the principal... and he promised to follow up on the issue. The principal of the school asked the religious teacher not to create differences and conflict

322 I-11.

323 I-20.

324 I-5, I-9, I-10, I-14, I-18.

325 I-14.

326 I-23.

327 I-5, I-7, I-8, I-10, I-20.

between the students, and not disturb the order of the school. The principal even went into the classroom and told the students to forget what their religious teacher said and encourage them to focus on their studies instead.³²⁸

I know that some of the teachers would teach [the Bahá'í] lesson in a harsh way, to just suppress Bahá'í students... But in my case, for example, it was very interesting because my teacher, my history teacher, told the students that 'not everything in the book is right'. For this lesson, [the teacher] asked [me] to come and tell [the class] about the Bahá'í Faith. And so I stood up and I talked to students for like ten minutes.³²⁹

I had teachers who were not happy about having a Bahá'í student in their class, and they were more, I would say, more tough on us as Bahá'ís in terms of the way that we behave and day to day activities that we would have as a student. And I had teachers that were completely neutral about the fact and even they at times had expressed their concern that 'I am worried that you, as a Bahá'í, may not be able to get the education that you deserve' and they were kind of an ally for us.³³⁰

Students reportedly accept and adopt anti-Bahá'í rhetoric. Several interviewees reported anti-Bahá'í attitudes in the schoolyard, in the forms of bullying, harassment, or avoidance from fellow students. For instance, students would repeat anti-Bahá'í taunts, would avoid shaking hands, or would ask to verify stereotypes such as wanting to see a Bahá'í student's tail, or asking whether they engage in incestuous relations.³³¹ However, most interviewees stressed that this was not widespread, and that their other peers were often supportive and sympathetic.³³²

I had classmates who just didn't mind that I was a Bahá'í and they associated with me normally. But I also had classmates that were prejudiced... They would call me 'impure' and 'infidel', they wouldn't drink from the same tap water that I had drunk from, or they would tell me that they can't shake my hand, things like that ... I had some classmates who were curious to see my tail, because they had heard the Bahá'ís have tails.³³³

Defying cultural violence

Galtung theorises direct, structural, and cultural violence as mutually reinforcing. Imagining these as points of a triangle, he explains:

Violence can start at any corner in the direct-structural-cultural violence triangle and is easily transmitted to the other corners. With the violent structure institutionalized and

328 I-21.

329 I-5.

330 I-10.

331 I-3, I-7, I-20.

332 I-2, I-5, I-7, I-16.

333 I-20.

the violent culture internalized, direct violence also tends to become institutionalized, repetitive, ritualistic, like a vendetta.³³⁴

The direct violence observed is predominantly that perpetrated by the State; structural violence is similarly a product of State policy. There is certainly some direct violence occurring also at the community level in the form of religious fanaticism and hate crime.³³⁵ However, this report argues that there appears to be a lack of internalization of what Galtung terms the 'violent culture'—in this case, anti-Bahá'í sentiment by the wider society.

According to the interviewees, the public—their neighbours, community, and even strangers—has largely resisted the attempted indoctrination by the State about the Bahá'í community. In fact, they responded that attitudes are increasingly shifting from avoidance to indifference and in some cases acceptance of the Bahá'ís—and even contempt of the State. As Zabihi-Moghaddam explains:

[E]fforts to poison the mind of the public against [the Bahá'í community] have largely failed, as more Iranians today than ever before express sympathy with their Bahá'í compatriots, condemn their persecution, and consider them entitled to enjoy basic human rights, including the right to freedom of belief.³³⁶

Interviewees largely echoed this sentiment:

The community itself has a better view towards Bahá'ís now... The policies have not changed, and even have been more strict over the past few years. But I'm happy that yes, my fellow citizens are more supportive of religious freedom as well as for the Bahá'í, for the Bahá'í citizens.³³⁷

In recent years, people's views have changed. Ordinary people now often respect the Bahá'í community, and sometimes they even have positive views about us. In the past, people didn't know much about Bahá'ís ... But today, people are more informed and have faced many challenges themselves. That's good. They no longer get influenced by the propaganda against the Bahá'í community that's spread through a TV, social media, newspaper and website.³³⁸

Muslims want to be friends with us now. They feel like they lost something. Sometimes people need time to realise something, to understand something.³³⁹

I think I experienced less discrimination or persecution on an interpersonal level. Of course, there are many aspects of persecution that are deeply entrenched in the fabric

334 Galtung (1990) 302.

335 See e.g., "Lack of Physical Safety: Murders, Acts of Violence, Arrests," in Yazdani (2018).

336 Zabihi-Moghaddam (2016) 126.

337 I-10.

338 I-21.

339 I-18.

of society and in institutions and in, you know, in media and in schools and things that you have no control over. But in interpersonal relationships, I think it got better.³⁴⁰

Before the Revolution and... for a short while after the Revolution, you would have people, ordinary people, being against the Bahá'ís. And you would sense that through their comments, through interactions. But after the Revolution, gradually this completely turned, became vice versa—that is, now the government was against the faith and against the Bahá'ís and people slowly, you would see them becoming even sympathetic towards the plight of the Bahá'ís.³⁴¹

Almost all interviewees expressed that neighbours and communities were increasingly indifferent to, or even supportive of, Bahá'ís:³⁴²

When I told... a few friends of mine that I'm a Bahá'í, typically the response was, 'you know what... we have a neighbour who's a Bahá'í, they are very, very nice'. Or 'I used to know a friend who was a Bahá'í, he was also a very nice, very kind' ... 'Bahá'í are good people'—that was the typical reaction.³⁴³

My own experience was that we had this Muslim gentleman who was very interested in the Bahá'í faith, and he would show up to all of our meetings and ask questions, and we treated him like just another Bahá'í, to be honest. He was very nice to all of us.³⁴⁴

My friend... knew I was Bahá'í, and I feel like she never really treated me different. And her mom was friends with my mom, and her mom knew as well. So we had neighbours who knew we were Bahá'í, who treated us with respect. But of course that's not everyone's experience.³⁴⁵

Many interviewees identified instances where their communities had been particularly supportive. One mentioned an incident when their Muslim neighbours warned them that Ministry of Intelligence officials had canvassed the neighbourhood looking for them,³⁴⁶ while another recalled neighbours offering to help hide Bahá'í books from the authorities.³⁴⁷ A separate interviewee spoke of the support of his neighbours and school community after their father was executed.³⁴⁸ One interviewee reported the support of their classmates and teachers when they were rejected from university on account of their faith:

It was all sympathy, all support from everyone, all the students, all the, all the teachers. There were some exceptions ... I could tell some people were not exactly very supportive,

340 I-20.

341 I-19.

342 E.g., I-2, I-5, I-7, I-16, I-13, I-15, I-17, I-18, I-19.

343 I-7.

344 I-8.

345 I-8.

346 I-5.

347 I-19.

348 I-13.

but at the same time, they didn't start cursing at me. Unlike my parents, I know my parents, when they were kids, they were cursed and spit at all of that. For me, if there was any negative sentiment, it was not verbalized.³⁴⁹

Of course, acceptance of Bahá'ís is not a universal reality, with some interviewees reporting mixed reactions with their communities:

There were some Muslims who made good friends with Bahá'ís. There were some who were a little bit hesitant, you know, and there were some, like, if they had they were coming from a clerical family or they had a relative who was part of that anti-Bahá'í society they wouldn't be comfortable to, to associate with us ... There were friends whom we knew that, perhaps after we go to their home and if we drink something in their glasses, they would wash it three times after we leave.³⁵⁰

[When the Revolution happened] I became a stranger. I said hello, but my friends did not even want to answer me anymore... Imagine that you're a teenager and suddenly your close friend is not your friend anymore.³⁵¹

For a few, I became untouchable [when they discovered my faith]. They stop touching me, they stop shaking hands with me. But for the vast majority—and I really want to emphasize on that—even on some of the very religious Muslims, they see me as a man of faith. They even invited me to the Ramadan iftar dinner, which is a very religious ceremony. I mean, it's a big deal, even though they knew I'm a Bahá'í. Nevertheless, they knew I'm a man of faith.³⁵²

Alongside very sporadic instances of direct violence by civilians, as discussed in Sections 1 and 2, some interviewees also expressed concern that if they were discovered to be Bahá'ís, or were caught engaging in Bahá'í practices, neighbours and other community members would notify the authorities or mistreat them.³⁵³ When asked why they left the country, one interviewee expressed frustration that, despite being overwhelmingly sympathetic towards Bahá'ís, the Iranian community is not willing to speak up on their behalf.³⁵⁴

Nonetheless, based on the interviews carried out, it would appear that Iranian public attitudes towards Bahá'ís are changing—that is, that the public at large is resisting the influence of the State's propaganda. This may, in part at least, be due to the public's gradual distancing of itself from religion,³⁵⁵ as well as increased public access to non-State media and social media.³⁵⁶

349 I-7.

350 I-9.

351 I-18.

352 I-7.

353 I-1, I-4, I-23.

354 I-15.

355 Ammar Maleki & Pooyan Tamimi Arab, *Iranians' attitudes toward religion: A 2020 survey report* (GAMAAN, 2020).

356 I-5, I-6, I-14. The increasing coverage of Bahá'ís by various civil society and media outlets marks a significant shift from two decades ago. Information about the Bahá'í community was primarily limited to publications by Bahá'í organisations and international organizations.

Section 5: Offences under international criminal law



The treatment of Bahá'ís by the Islamic Republic of Iran has been the subject of investigation by legal scholars and human rights bodies for decades. The Bahá'í International Community has recorded the killing of 226 Bahá'ís in Iran since 1978, including 216 between 1978 and 1989.³⁵⁷ A large majority of these Bahá'ís were executed by the State, while others were 'disappeared' or died in custody.³⁵⁸ These killings have been characterized by some experts as genocide. For example, the 1985 report by the Special Rapporteur on the prevention and punishment of the crime of genocide, Benjamin Whitaker, identified 'the contemporary Iranian killings of Bahá'í' as 'genocide'.³⁵⁹ Other experts and human rights organisations, such as a 2024 report published by Human Rights Watch, have characterized the lethal and non-lethal persecution of Bahá'ís as constituting 'crimes against humanity'.³⁶⁰

This report argues that the killing of Bahá'ís, based on information currently available, is more

357 "Baha'is killed in Iran since 1978," *Baha'i International Community* (2016) <https://www.bic.org/Bahai-Question-Revisited>

358 Ibid.

359 United Nations Economic and Social Council, *Revised and updated report on the question of the prevention and punishment of the crime of genocide*, UN Doc E/CN.4/Sub.2/1985/6 (2 July 1985) para 24. Allen stated in 1987 that Iran's persecution of the Baha'is violates the Genocide Convention, which Iran has ratified. The former Special Rapporteur on the situation of human rights in the Islamic Republic of Iran, Mr. Javaid Rehman, stated in his July 2024 report that 'the campaign against the Bahá'ís in the immediate aftermath of the 1979 Revolution was pursued with destructive, arguably genocidal intent'. Paul D. Allen, "The Baha'is of Iran: A Proposal for Enforcement of International Human Rights Standards," *Cornell International Law Journal* volume 20(2) (1987) 345; "Atrocity Crimes" and grave violations of human rights committed by the Islamic Republic of Iran (1981–1982 and 1988): Detailed findings of Mr. Javaid Rehman, the Special Rapporteur on situation of human rights in the Islamic Republic of Iran (Report, 17 July 2024) 11.

360 Human Rights Watch details the various forms of human rights violations committed against the Baha'is through state policies and actions directed by the state's most senior officials, and conclude that the cumulative impact of these violations amount to the crime against humanity of persecution'. Human Rights Watch (2024). The Iran Human Rights Documentation Center made a similar assertion. Iran Human Rights Documentation Center, *Crimes Against Humanity: The Islamic Republic's Attacks on the Bahá'ís* (2008).

appropriately characterized as crimes against humanity, a category of crime that also includes more contemporary abuses to which Bahá'ís are subjected. Genocide and crimes against humanity are legally distinct crimes under international law. They have a different *mens rea* (mental state of the alleged perpetrator), and the range of offences that may qualify as genocide is narrower than those that may qualify as crimes against humanity.³⁶¹ Despite this, crimes against humanity remain an extremely serious category of crime under international law. As Van den Herik remarks:

[G]iven that genocide is sometimes called the crime of crimes, it almost seems to place victims of genocide in some kind of higher position than victims of other international crimes. The misplaced focus on genocide outside the courtroom is worrisome, as it not only overlooks the existence of crimes against humanity as a separate international crime, but it also risks diverting attention from where it should be, namely on what is actually happening in a given situation.³⁶²

Iran's killing of Bahá'ís, although clearly motivated by the victims' membership of the Bahá'í faith, do not meet the legal requirements of genocide as explained below.

Genocide?

The Genocide Convention, to which Iran is a party,³⁶³ defines 'genocide' as the commission of acts specified in Article 2, 'with intent to destroy, in whole or in part, a national, ethnical, racial or religious group'.³⁶⁴ The *actus reus* (physical element) of the crime of genocide requires that at least one of the five enumerated acts be performed. In relation to Bahá'ís, there is little doubt that the *actus reus* is satisfied by the wave of executions and other killings in the wake of the Islamic Revolution of Iran, which satisfies Article 2(a) as 'killing members of a group'.³⁶⁵ Bahá'ís clearly satisfy the 'religious group' requirement.

Genocide is often referred to as a 'crime of *mens rea*'.³⁶⁶ What sets this crime apart from others is the requirement of intent: the 'intent to destroy a group'. The physical element of the crime—for example, the killing of certain individuals—must be motivated by intent to destroy the group to which the individual victims belong. To date, the general consensus is that the 'intent to destroy a group' refers to 'material destruction', often described as 'physical or biological destruction'. In 1996, the International Law Commission stated:

361 Guénaél Mettraux, "26 Genocide and Crimes against Humanity," in Guénaél Mettraux, *International Crimes and the ad hoc Tribunals* (Oxford University Press, 2005).

362 Larissa van den Herik, "The Meaning of the Word 'Destroy' and its Implications for the Wider Understanding of the Concept of Genocide," in Harmen van der Wilt, Jeroen Vervliet, Göran Sluiter, and Johannes Houwink ten Cate (eds), *The Genocide Convention: The Legacy of 60 Years* (Brill, 2012) 12-13.

363 Iran signed the Genocide Convention in 1949 and ratified it in 1956. United Nations Treaty Collection, *Convention on the Prevention and Punishment of the Crime of Genocide*, <https://treaties.un.org/pages/ViewDetails.aspx?src=IND&mtdsg_no=IV-1&chapter=4&clang=_en> .

364 *Convention on the Prevention and Punishment of the Crime of Genocide*, United Nations Treaty Series vol. 78, p. 277 (entered into force 12 January 1951), Article 2.

365 *Convention on the Prevention and Punishment of the Crime of Genocide*, Article 2(a).

366 *Prosecutor v Oman Hassan Ahmad Al Bashir*, ICC-02/05-01/09, PTC ICC I (4 March 2009), footnote 140.

[T]he destruction in question is the material destruction of a group either by physical or by biological means, not the destruction of the national, linguistic, religious, cultural or other identity of a particular group. The national or religious element and the racial or ethnic element are not taken into consideration in the definition of the word 'destruction', which must be taken only in its material sense, its physical or biological sense.³⁶⁷

In *Krstic*, the International Criminal Tribunal for the Former Yugoslavia (ICTY) acknowledged the potential expansion of the term 'destroy', but ultimately rejected it. The Trial Chamber, with which the Appeals Chamber concurred,³⁶⁸ found that:

Customary international law limits the definition of genocide to those acts *seeking* the physical or biological destruction of all or part of the group. Hence, an enterprise attacking only the cultural or sociological characteristics of a human group in order to annihilate these elements which give to that group its own identity distinct from the rest of the community would not fall under the definition of genocide.³⁶⁹

The International Court of Justice has affirmed this statement.³⁷⁰ The ICTY stated even more clearly in *Milosevic* that 'it is the material destruction of the group which must be intended and not the destruction of its identity'.³⁷¹

There have been some judicial attempts to broaden the *mens rea* requirement for genocide to include intent to destroy the group as a social entity.³⁷² The argument generally goes that the crime of genocide requires acts of physical destruction (e.g., killing), but may be motivated by intent to destabilize the social fabric of the group.³⁷³ Regardless, the current jurisprudence is generally clear that the crime of genocide requires the perpetrator to have carried out one or more of the impugned acts with the intent to *physically or biologically* destroy the group.³⁷⁴ For the purpose of this report, making a claim of genocide would require that Iran's killing of Bahá'ís was motivated by an intent to physically destroy the Iranian Bahá'í community (as opposed to the Bahá'í faith). Such intent does not appear to exist based on available information.

Calls exist to recognize Iran's persecution of Bahá'ís as 'cultural' genocide.³⁷⁵ This concept, referring

367 International Law Commission, *Draft Code of Crimes Against the Peace and Security of Mankind*, in Report of the International Law Commission on the work of its forty-eighth session, A/51/10 (1996) 45-46.

368 *Prosecutor v Radislav Krstic (Appeal Judgement)*, Case No. IT-98-33-A, 19 April 2004 [25]

369 *Prosecutor v Radislav Krstic (Trial Judgement)*, Case No. IT-98-33-T, 2 August 2001 [580]. (Emphases added)

370 *Bosnia and Herzegovina v Serbia and Montenegro* (Judgment of 26 February 2007) [344].

371 *Prosecutor v Slobodan Milosevic* (Trial Judgment of 16 June 2004) [124]

372 *Krstic* (ICTY Appeal Judgement), Dissenting Opinion of Judge Shahabuddeen, [51]; Federal Constitutional Court (Germany), 2 BvR 1290/99, 12 December 2000, [(III)(4)(a)(aa)], cited in *Krstic* (ICTY Trial Chamber) at [579]; *Krajisnic* (ICTY Trial Chamber), fn 1701; European Court of Human Rights, *Jorgic v Germany*, [114]. For scholarly work, see e.g., Elisa Novic, 'The Cultural Dimension of Crime of Genocide', in *The Concept of Cultural Genocide: An International Law Perspective* (Oxford University Press, 2016) 50-95.

373 Brown also argues for a relaxing of the law: Camilia R. Brown, "The Violence Persecution of the Iranian Baha'is: A Call to Take a Human Capabilities Approach to Defining Genocide," *Brooklyn Journal of International Law* volume 43(1) (2017) 361.

374 For more, see e.g., Elisa Novic, "Physical-biological or socio-cultural 'destruction' in genocide? Unravelling the legal underpinnings of conflicting interpretations," *Journal of Genocide Research* volume 17(1) 2015 63-82; van den Herik (2012) 51-58.

375 See e.g., Affolter (2005) 75-114; Momen (2019) 246.

to the intentional destruction of a culture as opposed to its people, was proposed for inclusion in the Genocide Convention, but ultimately excluded from the text.³⁷⁶ To date, international law continues to uphold a strict interpretation of the crime of genocide: cultural genocide is yet to be recognized as a legal concept under international criminal law.

In sum, the case for genocide is, at best, tenuous: to date, there is insufficient evidence to establish that Iran has intended to materially destroy, in whole or in part, its Bahá'í community. Instead, 'crimes against humanity' is a more appropriate characterization of both the killings and the non-lethal persecution of Bahá'ís, to which this report turns.

Crimes against humanity

The most widely accepted formulation of crimes against humanity is Article 7 of the Rome Statute of the International Criminal Court (ICC).³⁷⁷ Iran is not a party to the Rome Statute, having signed it in 2000 but not ratified it.³⁷⁸ However, the Rome Statute is a codification of crimes which evolved under customary international law,³⁷⁹ and the prohibition of which had been recognised as *jus cogens* norms.³⁸⁰

What distinguishes a crime against humanity from an ordinary crime or from other international crimes is the requirement that the inhumane acts enumerated in Article 7 of the Rome Statute must have been committed as a part of a 'widespread or systematic attack against a civilian population'.³⁸¹ 'Widespread' indicates a large-scale attack or one that involves a multiplicity of victims.³⁸² 'Systematic' refers to 'the organized nature of the acts', indicating a methodical plan, or a pattern.³⁸³ To constitute a crime against humanity, it is sufficient if the attack is *either* widespread *or* systematic.³⁸⁴ 'Attack' means a course of conduct involving the multiple commission of acts of violence referred to in Article 7, 'pursuant to or in furtherance of a State or organizational policy to commit such attack'.³⁸⁵ 'Civilian population' may refer

376 See e.g., Jeffrey Bachman (ed), *Cultural Genocide: Law, Politics, and Global manifestations* (Taylor & Francis, 2019); Elisa Novic, *The Concept of Cultural Genocide: An International Law Perspective* (Oxford University Press, 2016).

377 *Rome Statute of the International Criminal Court* (adopted 17 July 1998, entered into force 1 July 2002) art.7.

378 'The States Parties to the Rome Statute', International Criminal Court (Web Page) <https://asp.icc-cpi.int/states-parties>

379 'Crimes against humanity' was formally recognised as a distinct crime during the Nuremberg trials following World War II. The Nuremberg charter included a provision on 'crimes against humanity' as one of the crimes within the jurisdiction of the military tribunal, and defined it in Article 6(c). The notion of crimes against humanity has been restated in the statutes of the International Criminal Tribunals for the former Yugoslavia and for Rwanda. In 1996, the International Law Commission formulated a draft code of crimes against the peace and security of mankind based on the Charter and Judgment of the Nuremberg Tribunal. The code enumerated certain inhumane acts as constituting crimes against humanity 'when committed in a systematic manner or on a large scale and instigated or directed by a Government or by any organization or group'. *Charter of the International Military Tribunal* (1945); International Law Commission, *Draft Code of Crimes Against the Peace and Security of Mankind*, in Report of the International Law Commission on the work of its forty-eighth session, UN Doc A/51/10 (1996). Hereafter *Draft Code of Crimes*, 1996.

380 Crimes against humanity is one of the four international core crimes which are considered as the gravest of crimes under international law (along with genocide, war crimes, and the crime of aggression). There is consensus in legal literature that the prohibition of these crimes had reached the status of *jus cogens* from which no derogation is ever permitted. United Nations (UN), *Draft conclusions on identification and legal consequences of peremptory norms of general international law (jus cogens)* (2022) Conclusion 4, Conclusion 23, Annex; M. Cherif Bassiouni, "International Crimes: "Jus Cogens" and "Obligatio Erga Omnes", *Law and Contemporary Problems* volume 59 (4) (1996) 68; Werner Nicolaas Nel, International criminal accountability for religious persecution in terms of the Rome Statute: A taxonomy of crimes against humanity of religious persecution, LLD Thesis, University of Pretoria (July 2019) 24.

381 *Rome Statute of the International Criminal Court*, art.7; Mettraux, 2005, p. 155, citing numerous rulings of the International Criminal Tribunal for the former Yugoslavia (ICTY) International Criminal Tribunal for Rwanda (ICTR).

382 *Draft Code of Crimes*, 1996, art. 18, Commentary 4.

383 Mettraux (2005) 171.

384 *Ibid* 170.

385 *Rome Statute of the International Criminal Court*, art. 7(2)a; Mettraux (2005) 156.

to 'a sizeable group of people [who are non-combatants] who possess some distinctive features that mark them as targets of the attack'.³⁸⁶

The remaining portion of this section explains the reasons why the persecution of Bahá'ís amount to crimes against humanity. In doing so, this section may appear repetitive in referring to different types of oppression and persecution already outlined in Sections 1-4. This was to some extent unavoidable because each section is intended to work as a stand-alone section.

Killings of Bahá'ís as a crime against humanity

One of the acts enumerated in Article 7 of the Rome Statute is 'murder' (Article 7.1.a). The killings of more than 200 Bahá'ís in Iran, particularly between 1978 and 1989, was clearly systematic and in furtherance of an overall government plan to target Bahá'ís:

Since 1979, more than 200 Bahá'ís have been executed, solely on the basis of their religious beliefs, with nearly half of them representing the elected members of the local and national Bahá'ís governing councils. Regarded by the Iranian authorities and by the Iranian criminal justice system as 'unprotected infidels', Bahá'ís have been murdered with impunity and violations of their human rights have not been investigated.³⁸⁷

These killings were systematic as there was clearly a pattern of targeting the Iranian Bahá'í community, especially those elected and appointed as leaders. For example, in 1980, all nine members of the national Bahá'í governing council were abducted and were never seen again, prompting members to believe they were executed.³⁸⁸ That same year, 20 Bahá'ís were executed by the government and at least four were stoned, assassinated, or burned to death.³⁸⁹ In 1981, at least 48 Bahá'ís were killed—including the new members of the governing council who replaced the missing leaders.³⁹⁰ In 1982, at least 32 Bahá'ís were killed; and at least 29 in 1983—including ten women (aged 17 to 57) who were executed based on charges of teaching Bahá'í children's classes and for their refusal to renounce their faith.³⁹¹ In 1984, 30 Bahá'ís were executed, including four new members of the reconstituted council.³⁹² The brutal killings and executions of Bahá'ís amount to a crime against humanity, namely murder.

386 Ibid 166.

387 United Nations General Assembly, *Report of the Special Rapporteur on the situation of human rights in the Islamic Republic of Iran*, A/74/188 (18 July 2019) para 47.

388 Javid Rehman, "Atrocity Crimes" and grave violations of human rights committed by the Islamic Republic of Iran (1981–1982 and 1988): Detailed findings of Mr. Javid Rehman, the Special Rapporteur on situation of human rights in the Islamic Republic of Iran (Report, 17 July 2024) 57, citing April 2024 Submission from Bahá'í International Community.

389 Ibid.

390 Ibid.

391 Rehman (2024) 57.

392 Ibid.

Crime against humanity of persecution

The Rome Statute defines persecution as ‘the intentional and severe deprivation of fundamental rights contrary to international law by reason of the identity of the group’ (based on ethnic, cultural, religious, and other grounds).³⁹³ Under the Rome Statute, the crime of persecution can be prosecuted only in connection with any of the crimes within the jurisdiction of the ICC (e.g. the denial of rights must have occurred in connection with genocide).³⁹⁴ There is no such requirement under customary international law.³⁹⁵ The important element for the crime of persecution is intent to discriminate: to target persons because of their affiliation in a particular group.³⁹⁶ The acts are committed within the context of a widespread or systematic practice, and result in grave violations of the fundamental rights of this particular group.³⁹⁷ As Pocar explained:

The actus reus of the crime consists of an underlying act which discriminates in fact and must deny a fundamental human right laid down in international law. The *mens rea* of persecution is discrimination on one of the listed grounds.³⁹⁸

The Iranian government’s intent to discriminate against and persecute the Bahá'ís based on religious grounds is clear in the series of policies that have been implemented throughout the years. The State has made it an official policy to implement measures that hinder Bahá'ís from exercising their rights. In 1983, authorities announced a legal ban on all Bahá'í administrative and community activities, effectively criminalizing the Bahá'í faith.³⁹⁹ This decree required the dissolution of the national Bahá'í governing council, which was responsible for the management of Bahá'ís administrative affairs including marriages and burials; and the dissolution of about 400 local-level administrative bodies.⁴⁰⁰ The ban remains in effect, and has been reiterated in subsequent decrees.⁴⁰¹ In 1991, a confidential memorandum issued by the Iranian Supreme Revolutionary Cultural Council set out the government policy to discriminate against Bahá'ís and to block their progress and development, including expelling them from universities and denying them employment or any position of influence.⁴⁰² The memorandum

393 *Rome Statute of the International Criminal Court*, art. 7.2.g.

394 *Ibid* art. 7.1.h.

395 Note also that major instruments before the Rome Statute, such as Statute of the International Criminal Tribunal for the Former Yugoslavia, art. 5(h), and Statute of the International Criminal Tribunal for Rwanda, art. 3(h); and those succeeding the Rome Statute such as the Statute of the Special Court for Sierra Leone (14 August 2000) art. 2(h); and Malabo Protocol, Malabo, Equatorial Guinea (27 June 2014), art. 28C(1)(h), among others, do not require any additional connection with other crimes under international law for the crime against humanity of persecution. Experts have noted that the connection requirement is ‘a jurisdictional threshold to restrict the competence’ of the ICC in order to ‘avoid a sweeping interpretation criminalizing all discriminatory practises’, among other reasons. Kriangsak Kittichaisaree, *International Criminal Law* (Oxford University Press, 2002) 121.

396 *Prosecutor v Kupreskic et al*, ICTY Trial Chamber, Judgement, 14 January 2000, [636]. See *Prosecutor v Duško Tadić (Trial Judgement)* para 697,699; Helen Brady & Ryan Liss, ‘The Evolution of Persecution as a Crime Against Humanity’, in Morten Bergsmo et al. (eds.) *Historical Origins of International Criminal Law: Volume 3* (Torkel Opsahl Academic E-Publisher, 2014) 430.

397 See Antonio Cassese and Paola Gaeta, *Cassese’s International Criminal Law*, Third Edition (Oxford University Press, 2013).

398 Fausto Pocar, ‘Persecution as a Crime Under International Criminal Law,’ *Journal of National Security Law & Policy* volume 2(355) (2001) 358.

399 Rehman (2024) 57.

400 *Ibid*.

401 A 2009 letter of the then-prosecutor general to the Minister of Intelligence reiterated the ban, stating that the ‘activities of the perverse Baha’i sect are illegal and banned’ on any level. ‘Prosecutor General tells Minister of Intelligence that all Baha’i activities are illegal and banned’, *Archives of Bahá'í Persecution in Iran* (16 February 2009) <https://iranbahai-persecution.bic.org/archive/prosecutor-general-tells-minister-intelligence-all-bahai-activities-are-illegal-and-banned>.

402 An English translation of the memorandum (along with the Persian original) is available at: ‘Situation of Baha’is in Iran – Iranian Government Documents’, *Baha’i International Community*, <https://www.bic.org/focus-areas/situation-iranian-bahais/policy-memos-from-iran>

has been affirmed in subsequent government correspondence and court decisions.⁴⁰³ In 2005, the Chairman of the Command Headquarters of the Armed Forces in Iran sent a confidential letter to State agencies ordering them to identify all Bahá'ís and collect information about their activities.⁴⁰⁴ The then UN Special Rapporteur on freedom of religion or belief expressed concern that information gained from this activity will be used as a basis to increase discrimination against and persecution of Bahá'ís.⁴⁰⁵

Iranian authorities also continue to express messages that incite hatred against Bahá'ís. Ayatollah Khomeini and Ayatollah Ali Khamenei, the former and current Supreme Leaders respectively, have issued decrees declaring that followers of the 'misguided Bahá'í sect' are 'infidels' 'unclean', and 'should be avoided'.⁴⁰⁶

Denial of religious freedom. Bahá'ís, along with other religious minorities that are not recognized in the constitution, are not entitled to the freedom guaranteed by the constitution 'to perform their religious rites and ceremonies'.⁴⁰⁷ They 'are prohibited from establishing any official institutions, cannot freely hold prayers, even in private, or perform other acts that are integral to their religion, such as disseminating religious material'.⁴⁰⁸

Denial of access to education. Following the 1979 revolution, many Bahá'í students were expelled from school, and such expulsions continue today⁴⁰⁹ The 1991 government memorandum, which remains in effect, specified that Bahá'ís can only be enrolled in schools if they have not identified themselves as such; once it becomes known that they are Bahá'ís, they are to be expelled.⁴¹⁰ Bahá'í International Community's records show over 100 recent instances where students were expelled, denied entry, or subjected to discriminatory treatment because of their Bahá'í faith.⁴¹¹ Moreover, there is a systematic ban on Bahá'í students accessing tertiary education, with students either being denied entry to universities or being expelled upon discovery of their faith. In response to this, the Bahá'í community established the Bahá'í Institute for Higher Education (BIHE), but Iranian authorities have harassed, arrested, and prosecuted those associated with the school.⁴¹²

Denial of employment and property rights. Bahá'ís are denied access to most public sector jobs. There are at least two laws that explicitly state that membership of the Bahá'ís religion is an offence that results in permanent dismissal from public sector employment.⁴¹³ Working in the private sector

403 Human Rights Watch (2024) 10.

404 An English translation of the letter (along with the Persian original) is available at: 'Situation of Baha'is in Iran – Iranian Government Documents', *Baha'í International Community*, <https://www.bic.org/focus-areas/situation-iranian-bahais/policy-memos-from-iran>

405 'Special Rapporteur on Freedom of Religion or Belief Concerned About Treatment of Followers of Bahá'í Faith in Iran', *United Nations* (20 March 2006) <https://www.ohchr.org/en/press-releases/2009/10/special-rapporteur-freedom-religion-or-belief-concerned-about-treatment>

406 Human Rights Watch (2024) 14.

407 *Constitution of the Islamic Republic of Iran* (1979, amended in 1989), art. 13, https://www.constituteproject.org/constitution/Iran_1989.pdf?lang=en.

408 Human Rights Watch (2024) 39.

409 Ibid 22.

410 An English translation of the memorandum (along with the Persian original) is available at: 'Situation of Baha'is in Iran – Iranian Government Documents', *Baha'í International Community* (Web Page) <https://www.bic.org/focus-areas/situation-iranian-bahais/policy-memos-from-iran>

411 'Exclusion from Primary and Secondary Education', *Archives of Baha'i Persecution in Iran* (Web Page) <https://iranbahaipersecution.bic.org/taxonomy/term/106>

412 Human Rights Watch (2024) 26.

413 See *Law on Restructuring the Human Resources of Government and Government-affiliated Ministries and Institutions* (11 October 1981), arts. 19, 29; *Law on Administrative Offenses of 1993*, sec. 34, art. 8. These discriminatory provisions have been subsequently upheld in legal opinions by Iran's Court of Administrative Justice. Human Rights Watch (2024) 27.

is also limited, as authorities have refused to issue professional licences to Bahá'ís, reasoning that membership of one of the official religions in Iran is a condition for receiving a professional license.⁴¹⁴ Authorities have suspended or revoked licenses of Bahá'í-owned businesses, effectively allowing only businesses 'that would provide [Bahá'ís] with an ordinary livelihood' to employ Bahá'ís.⁴¹⁵

Iranian authorities have confiscated hundreds of Bahá'í-owned properties, with forced evictions often accompanied by threats and physical violence.⁴¹⁶ Between 1980 to 2006, at least 640 Bahá'ís properties—including houses, agricultural land, and sacred places—were confiscated, in addition to numerous undocumented cases especially in distant provinces.⁴¹⁷

Violation of the right to liberty and security of person. Members of the Bahá'í community are routinely subjected to arbitrary arrests and prosecution. During the summer of 2022 alone, dozens of Bahá'í homes were raided and at least 30 people were arrested.⁴¹⁸ From July 2023 to July 2024, 93 Bahá'ís were summoned to court or to prison.⁴¹⁹ Bahá'ís are typically charged under provisions of the Islamic Penal Code pertaining to 'membership in/establishing a group against the state (Articles 498 and 499); 'propaganda against the state' (Article 500); and 'assembly and collusion to act against national security' (Article 620).⁴²⁰ Courts have convicted individuals using membership in an 'illegal' group, or participating in activities such as prayer sessions, as 'evidence' of a criminal offence.⁴²¹

Discrimination in matters pertaining to personal status and civil rights. A digital system for the registration of marriages introduced in 2023 requires couples to indicate their religion, but only provides the option to select from the four recognized religions without space to nominate any other option—effectively denying Bahá'ís the right to register their marriages.⁴²² Iranian courts have also rejected claims of inheritance, stating that the issuance of inheritance decrees would be tantamount to recognising Bahá'ism, which is against constitutional law.⁴²³ Bahá'ís are also denied dignified burial, as authorities routinely interfere with burial processes, refusing the burial of Bahá'ís in historically Bahá'í cemeteries and insisting that they instead buried in mass graves.⁴²⁴ Authorities have repeatedly desecrated and demolished Bahá'í cemeteries, and in some cases even unlawfully exhumed and transferred the bodies to abandoned areas.⁴²⁵

414 Human Rights Watch (2024) 28.

415 'Review of the eligibility of individuals belonging to small groups and the perverse Bahaist sect', *Bahá'í International Community* (Web Page) <https://www.bic.org/sites/default/files/pdf/iran/9%20April%202007%20letter%20to%20county%20police%20forces%20about%20perverse%20Baha%27%20sect%20ENG.pdf>. There were about 354 instances of closure of Baha'í owned businesses ordered by authorities between 2018 to 2022. Human Rights Watch (2024) 31

416 UN Economic and Social Council, *Report of the Special Rapporteur on adequate housing as a component of the right to an adequate standard of living*, Miloon Kothari, E/CN.4/2006/41/Add.2 (21 March 2006) para 83-84.

417 Ibid. Human Rights Watch has detailed more recent cases of confiscation and demolition of Bahá'ís owned properties: Human Rights Watch (2024) 31-36.

418 Human Rights Watch (2024) 17.

419 "Overview of Trends of Persecution Against Baha'is in Iran," *Bahá'í International Community* (July 2024) <https://www.bic.org/focus-areas/situation-iranian-bahais/current-situation>

420 Human Rights Watch (2024) 17.

421 Ibid 16.

422 Ibid 37.

423 "Non-Issuance of Certificate of Inheritance," *Archive of Bahá'í Persecution in Iran* (4 July 2007) <https://iranbahai persecution.bic.org/fa/archive/dm-sdwr-gwahy-hsr-wrath>

424 "Iran: Stop destruction of mass grave site and allow dignified burials of persecuted Baha'is," *Amnesty International* (Web Page, 29 April 2021) <https://www.amnesty.org/en/latest/news/2021/04/iran-stop-destruction-of-mass-grave-site-and-allow-dignified-burials-of-persecuted-Bahais-2/>

425 Ibid.

In sum, the severe human rights violations of Bahá'ís, committed by Iranian authorities with a clear discriminatory intent, and carried out in a systematic manner for decades, amount to the crimes against humanity of murder and persecution, which need to be investigated. Iran is not a party to the ICC, and it has not incorporated crimes against humanity into its domestic legal framework. However, under the principle of universal jurisdiction, national judicial authorities in other countries can investigate and prosecute certain serious crimes, including crimes against humanity.⁴²⁶ The principle of universal jurisdiction allows other States 'to step in on behalf of the international community'.⁴²⁷ The rationale for this is that any State may punish perpetrators of crimes against humanity because they are 'common enemies of all mankind and all nations have an equal interest in their apprehension and prosecution'.⁴²⁸ Pursuing criminal accountability for the crimes committed against Bahá'ís is not only crucial for justice, accountability and reparation, but in preventing the commission of similar crimes in the future.

426 Gerhard Werle and Florian Jeßberger, *Principles of International Criminal Law* (4th Edition) (Oxford University Press, 2020) 97.

427 Ibid.

428 *Demanjuk v Petrovsky* (1985) 603 F. Supp. 1468; 776 F. 2d. 571

Conclusion



The title of this report—*Outsiders: direct, structural, and cultural violence against Bahá'ís in the Islamic Republic of Iran*—takes inspirations from Howard Becker's book, *Outsiders: Studies in the Sociology of Deviance*, published in 1963.⁴²⁹ According to Becker's theory, deviance is not an inherent quality of an act or group, but rather a label applied by those in power. In Iran, the State, rooted in Shi'a Islam, has effectively labelled the Bahá'í faith as heretical and its followers as deviant from accepted religious norms. The consequences of this labelling are far-reaching. Once branded as an outsider, Bahá'ís in Iran face systematic discrimination and persecution, exemplifying Becker's observation that labelling can lead to tangible social repercussions, including the loss of life, manifested in various forms of direct, structural, and cultural violence.

Drawing on Johan Galtung's violence triangle, this report has examined the direct, structural, and cultural violence inflicted upon the Bahá'í community. Direct violence against Bahá'ís has taken various forms, from executions, extrajudicial killings and enforced disappearances to arbitrary arrests, detention, and physical assaults. While the frequency of killings has decreased since the mid-1980s, other forms of direct violence persist, creating a pervasive and persistent atmosphere of fear and insecurity within the Bahá'í community. The destruction of Bahá'í property, including homes, businesses, and sacred sites, has been another significant form of direct violence, with authorities often participating in or condoning such acts. The State's role in perpetrating and enabling this violence, coupled with its failure to investigate or prosecute crimes against Bahá'ís, has fostered a climate of impunity.

Structural violence is embedded in the very fabric of Iranian society and its institutions. The constitutional omission of the Bahá'í faith as a recognized religion has provided the legal framework for

429 Howard S. Becker, *Outsiders: Studies in the Sociology of Deviance* (The Free Press, 1963).

systematic discrimination. This has manifested in the denial of education, employment opportunities, property rights, and basic civil liberties. On education, the resilience of the Bahá'í community highlights how labelled groups often form subcultures in response to their marginalization. Establishing the Bahá'í Institute for Higher Education, in response to their exclusion from universities demonstrates the resilience of the community in the face of persecution, while also inadvertently reinforcing their separate status in society.

The non-recognition of the Bahá'í faith in the Iranian Constitution—which has been used to justify the systematic discrimination against and persecution of Bahá'ís—may also itself amount to a violation of international law, especially given the provision that only those recognized as religious minorities are free to perform their religious rites and ceremonies. Based on the ICCPR and decisions of human rights bodies, the right to freedom of religion includes freedom to manifest this religion in worship, observance, practice and teaching. Refusal to officially recognize a religion—and therefore depriving it of any legal personality, makes it impossible to carry out activities which are essential to the practice of such religion, amounting to a violation of the right to freedom of religion.

Cultural violence, while less tangible, plays a crucial role in justifying and perpetuating the mistreatment of Bahá'ís. State-sponsored propaganda, religious rhetoric, and media narratives have sought to demonise the Bahá'í faith and its adherents. However, this report suggests that these efforts have not fully succeeded in turning the Iranian public against Bahá'ís, with many Iranians expressing sympathy or indifference rather than hostility.

Finally, on accountability under international criminal law, the systematic and widespread nature of these abuses against Bahá'ís in Iran means that they arguably constitute crimes against humanity under international law. Specifically, the killings and persecution of Bahá'ís appear to meet the criteria for the crimes of murder and persecution as defined in the Rome Statute. While Iran is not a party to the Rome Statute of the International Criminal Court, the principle of universal jurisdiction offers avenues for accountability.

While Galtung's theory on violence helps us understand the interplay between the three types of violence, the same framework may be applied to building peace:

The triangle of violence should be contrasted in the mind with a 'triangle of peace' in which cultural peace engenders structural peace, with symbiotic, equitable relations among diverse partners, and direct peace with acts of cooperation, friendliness and love.⁴³⁰

Indeed, despite the grim picture painted by this report, there are glimmers of hope. The resilience of the Bahá'í community in the face of ongoing persecution is remarkable. One interviewee stated:

430 Galtung (1990) 302

The Islamic government has employed various policies to undermine the Bahá'í community in Iran, ranging from social and economic deprivation to spreading hate speech and sowing discord among Bahá'í families and friends. They've done everything possible to weaken the community, yet the Bahá'ís have [fought] to protect their unity and maintain a spirit of constructive resilience. However, the impact of these relentless challenges is evident. More and more Bahá'ís have left the country to seek safety elsewhere, and some families have suffered severely due to economic hardships. Others have broken down under the weight of social pressures. Despite this, I believe there is still a great deal of hope and strength within the Bahá'í community, especially among the youth, to contribute to building a better Iran.⁴³¹

Moreover, the apparent failure of cultural violence to fully take root in Iranian society suggests that there may be potential for change. The growing sympathy or indifference towards Bahá'ís among the general public, coupled with increasing access to alternative sources of information, may gradually erode the foundations of this system of oppression.

The persecution of Bahá'ís in Iran serves as a stark ongoing reminder of the potential consequences when religious intolerance is combined with political power. It highlights the importance of safeguarding religious freedom and minority rights, and the need for continued efforts to promote tolerance and pluralism in societies around the world.

431 I-17.

Appendix: List of Interviewees

Interviewees' Names	Interviewees' unique identifier	Interview date (DD/MM/YYYY)
	I-1	21/06/2024
	I-2	09/07/2024
	I-3	15/07/2024
	I-4	16/07/2024
	I-5	16/07/2024
	I-6	18/07/2024
	I-7	18/07/2024
	I-8	19/07/2024
	I-9	24/07/2024
	I-10	25/07/2024
	I-11	27/07/2024
	I-12	31/07/2024
	I-13	02/08/2024
	I-14	06/08/2024
	I-15	10/08/2024
	I-16	13/08/2024
	I-17	13/08/2024 (written interview)
	I-18	20/08/2024
	I-19	21/08/2024
	I-20	22/08/2024
	I-21	22/08/2024
	I-23	10/09/2024
Amin Tavakoli	I-24	20/7/2023
	I-25	26/8/2023
Zia Missaghi	I-26	31/10/2023
Mehraeen Mavedat	I-27	12/12/2023
Ramona Naji	I-28	20/12/2023

	I-29	10/6/2024
	I-30	9/4/2024
Azadeh	I-31	30/5/2024
	I-32	30/07/2024
	I-33	11/07/2024
	I-34	7/8/2023
	I-35	15/4/2024
Hessamoddin Katibpur Shahidi	I-36	31/10/2023
	I-37	30/10/2023
	I-38	6/12/2023
Raha Sabet Ravestani	I-39	22/4/2024
Kina Sabeti	I-40	3/5/2024
	I-41	9/6/2024
	I-42	8/6/2024
Pooya Tabyanian	I-43	14/6/2024
	I-44	20/7/2024
Sepeher Atefi	I-45	11/6/2024
Mona Mahmoudi	I-46	20/12/2023
Merat Bagha	I-47	20/12/2023
	I-49	10/6/2024
	I-50	7/8/2023
	I-51	12/6/2024
	I-52	27/9/2024
	I-53	29/9/2024
	I-54	15/8/2023
	I-55	7/3/2023
	I-56	4/12/2023
	I-57	30/8/2024

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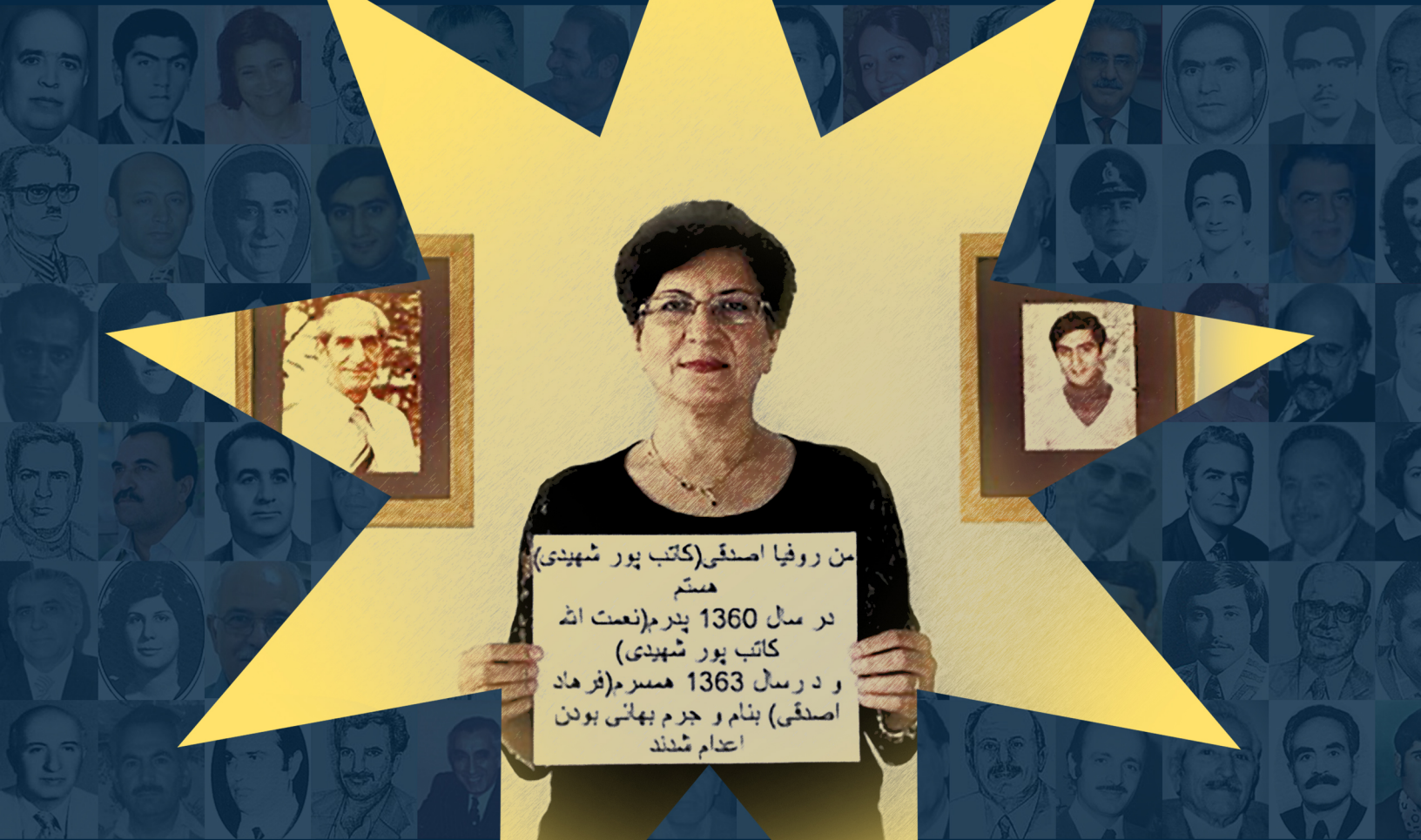
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