



2021-07-27

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Stockholm District Court
Section 4,
Box 8307
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STOCKHOLM DISTRICT COURT
Section 4

ENTERED: 2021-07-27
CASE NUMBER: B 15255-19
ACT: 389

TR target: B 15255-19
Handl.: HEALTH

1	Defendant: surname and all first names		Contact name	Occupation/Title
	Noury, Hamid			
	Personnr 1961-04-29	Citizens of Iran	Phone	Interpreting needs Persian
	Address			
	Public defender/representative Marcus, Daniel, Stockholms Advokatteam AB, Wennerbergsgatan 10, 5 tr, 112 58 STOCKHOLM Tomas Söderqvist, Kriström Advokatbyrå KB, Box 7184, 103 88 STOCKHOLM			
	Deprivation of liberty etc. Arrested in absentia 2019-11-08, Arrested 2019-11-09, Detained 2019-11-13.			
Contact details				

Liability claims etc.

1. INTERNATIONAL CRIME, SERIOUS CRIME (5000-K1391829-19)

The plaintiffs represented by Göran Hjalmarsson, lawyer

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

The plaintiffs represented by Bengt Hesselberg, lawyer

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

The applicants, represented by Ghita Hadding Wiberg, lawyer

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

The plaintiffs represented by Kenneth Lewis, Solicitor

Aliakbar Bandali
Mohammed Zand
Khadijeh Borhani
Hossein Seyed Ahmadi

DESCRIPTION OF THE ACT

Between 1981 and 1988, an international armed conflict took place between Iran and Iraq. In the final phase of the armed conflict, Iran was attacked on several occasions, including on 26 July 1988 by an armed wing of the political organisation Iranian People's Mujahedin (Mujahedin), with the Mujahedin becoming part of the international armed conflict. The attacks emanated from Iraqi territory and were supported by and in cooperation with the Iraqi army.

In the event that the Mujahedin's actions under the first paragraph were not to be considered part of the international armed conflict between Iran and Iraq in the spring-summer of 1988, there was, in addition to the conflict between Iran and Iraq, a non-international armed conflict between the State of Iran and the Mujahedin.

Iran's supreme leader, Ayatollah Khomeini, issued a fatwa/order shortly thereafter, mainly in response to the attack of 26 July 1988, that all prisoners in the

Iranian prisons who belonged/sympathized with the Mujahedin and who were faithful/loyal in their beliefs would be executed.

Shortly afterwards, mass executions of Mujahedin supporters/sympathisers imprisoned in Iranian jails began.

Hamid Noury, between 30 July 1988 and 16 August 1988, in Gohardasht (Rajaei Shahr) Prison, Karaj, Iran, in his capacity as Assistant Deputy Prosecutor or in any other similar position/role, together and in collusion/consultation with other perpetrators, intentionally deprived the lives of a very large number of prisoners who belonged to/sympathised with the Mujahedin, (including the persons listed in Annex A).

Hamid Noury's involvement in the executions has consisted of organising and participating in the executions together and in agreement/consultation with others by, inter alia, selecting the prisoners to be brought before a court-like commission (committee) mandated by the Fatwan Order to decide which prisoners should be executed, taking these prisoners to the so-called death corridor and guarding them there, read out the names of the prisoners to be brought to the committee, brought the prisoners to the committee, provided written/oral information about the prisoners to the committee, read out the names of the prisoners to be brought for execution, ordered the prisoners to line up to be escorted to the place of execution and also escorted the prisoners there after which the prisoners were deprived of life by hanging. Hamid Noury himself has also attended and participated in the executions on one or more occasions.

Hamid Noury, as Assistant Deputy Prosecutor or in other similar position/role in Gohardasht Prison, together and in concert/consultation with other senior officials, has also incited and ordered other perpetrators to participate in the executions by assisting him and other senior officials in their conduct as described above and carrying out the executions.

In any event, Mr Hamid Noury, together and in agreement/consultation with other perpetrators, carried out, through the above-mentioned procedure, death sentences imposed by the Committee, which were imposed in a manner that did not meet the basic requirements of a fair trial as required by international humanitarian law.

Furthermore, Hamid Noury, in his capacity as assistant to the Deputy Prosecutor or in another similar position/role, during the same period and in the same place, together and in collusion/consultation with other perpetrators, inflicted severe suffering on a very large number of detainees who belonged to/sympathised with the Mujahedin, (including the persons listed in Annexes A and B).

This is done by inflicting severe agony on the prisoners, which constitutes torture and inhuman treatment, by bringing the prisoners to the Committee and/or taking them to the so-called death row to await their admission to the Committee and/or awaiting the Committee's decision and, where appropriate, taking them to the place of execution and carrying out preparatory measures for execution.

Hamid Noury's complicity in the torture and inhuman treatment has consisted of selecting, together and in agreement/consultation with others, the prisoners to be brought before the committee that would decide which prisoners would be executed, taking the prisoners to the so-called death row, ordering the prisoners to sit there and wait, often for several hours, guarding them, reading out the names of those to be brought before the committee and bringing them before the committee, reading out the names of the prisoners to be taken to the place of execution, ordering the prisoners to line up to be escorted to the place of execution and also escorting prisoners there.

Hamid Noury, as assistant to the Deputy Prosecutor or in any other similar position/role in Gohardasht Prison, together and in concert/consultation with other senior officials, has also incited and ordered other perpetrators to participate in the torture and inhuman treatment by assisting him and other senior officials in their actions as described in the preceding paragraph.

In any event, it is alleged that Mr Noury is to be considered as an accomplice since, by all the acts mentioned above, he has encouraged the intentional killing and the torture and inhuman treatment with his advice and actions.

The main allegation is that the acts were committed as part of, or were otherwise connected with, the international armed conflict between Iran and Iraq.

Mr Hamid Noury has thus, by the said acts, directed against civilians enjoying special protection under the Geneva Convention IV or generally recognised principles of international humanitarian law, committed a serious violation of Article 147 of the Geneva Convention IV in conjunction with Article 75 and Article 85 of Additional Protocol I and of generally recognised principles of international humanitarian law.

In the alternative, it is alleged that the acts were committed as part of, or otherwise related to, a non-international armed conflict between Iran and the Mujahedin.

Mr Noury has thus committed, by the said acts, a serious violation of Common Article 3 of the Geneva Convention IV and of generally recognised principles of international humanitarian law.

The international crime is considered to be serious because a very large number of people have been executed, tortured and subjected to inhuman treatment in particularly cruel conditions.

Lagrum

Chapter 22, Section 6(1) and (2) of the Criminal Code as it stood before 1 July 1995, Article 147 Geneva Convention IV in relation to Articles 1, 72, 75 and 85 of Additional Protocol I, in the alternative Article 3 of Geneva Convention IV, or, as regards the killing, Chapter 3, Section 1 of the Criminal Code as it stood before 1 July 2009.

2. MURDER (5000-K1391829-19)

The plaintiffs represented by Göran Hjalmarsson, lawyer
Sara Rouzdar
Sahra Nikoo

The plaintiffs represented by Bengt Hesselberg, lawyer
Sedigheh Haji Mohsen
Vida Rostamalipour
Laleh Bazargan
Solmaz Alizadeh

The applicants, represented by Ghita Hadding Wiberg, lawyer
Esmat Talebi Kalhoran

DESCRIPTION OF THE ACT

The religious/political leadership in Iran decided sometime before 27 August 1988 that other political prisoners in Iranian prisons, who sympathised with various leftist groups and who were not devout Muslims/ were considered to have renounced their Islamic faith, would also be executed.

Hamid Noury, between 27 August 1988 and 6 September 1988, in Gohardasht (Rajaei Shahr) Prison, Karaj, Iran, in his capacity as assistant to the deputy prosecutor or in another similar position/role, together and in collusion/consultation with other perpetrators, intentionally deprived the life of a

a very large number of prisoners whose ideological/religious beliefs were found to be in conflict with the theocratic state of Iran, (including those listed in Annex C).

Hamid Noury's involvement in the executions has consisted of organising and participating in the executions together and in agreement/consultation with others by, inter alia, selecting the prisoners to be brought before a court-like commission (committee) that would decide which prisoners to execute, bringing these prisoners to the so-called death corridor and guarding them there, read out the names of the prisoners to be brought to the committee, brought the prisoners to the committee, provided written/oral information about the prisoners to the committee, read out the names of the prisoners to be taken for execution, ordered the prisoners to line up to be escorted to the place of execution and also escorted prisoners there, after which the prisoners were deprived of life by hanging.

Hamid Noury, as Assistant Deputy Prosecutor or in other similar position/role in Gohardasht Prison, together and in concert/consultation with other senior officials, has also incited and ordered other perpetrators to participate in the executions by assisting him and other senior officials in their conduct as described above and carrying out the executions.

In any event, Mr Hamid Noury, together and in agreement/consultation with other perpetrators, carried out the death penalty imposed by the Committee through the above-mentioned procedure, following a procedure which did not meet the basic requirements of a fair trial.

In the second place, it is claimed that Hamid Noury is to be considered an accomplice, since he, through the aforementioned acts, encouraged the murders with advice and deeds.

Lagrum

Chapter 3, Section 1 of the Criminal Code as it stood before 1 July 2009

Specific requests

1. It is requested that the seizure of Hamid Noury's mobile phone be continued until the judgment becomes final and then be lifted (Seizure number 2019- 5000-Bg123625 p. 1).
2. It is requested that Hamid Noury be expelled from the country with a prohibition to return in accordance with Chapter 8a, Section 1 of the Aliens Act (2005:716).

Annex A

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

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

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

Annex B

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

Annex C

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

EVIDENCE

All to prove that Hamid Noury committed crimes under international law, aggravated assault and murder in Gohardasht (Rajaei Shahr) prison in Karaj, Iran, from 30 July to 6 September 1988.

Oral evidence Interview

with Hamid Noury

1. Interrogation of **Iraj Mesdaghi** concerning his experiences and observations in Gohardasht prison during the period 1986 - 1989 and in Evin for some time thereafter, the reason for his imprisonment and his work in documenting and communicating his experiences during the mass executions, *in support of his conviction for sympathising with the Mujahedin, that the mass executions of the prisoners in Gohardasht prison took place between 30 July - 16 August 1988 (8 - 9 August 1988), and that the mass executions of the prisoners in Gohardasht prison took place between 30 July - 16 August 1988 (8 - 10 August 1988).*
25 murdered 1367) and on 27 August - 6 September 1988 (5 - 13 shahrivar 1367), that the person who went by the name of Hamid Abbasi in Gohardasht prison is Hamid Noury, that Hamid Noury was involved in the mass executions of prisoners in Gohardasht prison, that Hamid Noury worked as a representative of the prosecutors in Gohardasht, that Hamid Noury had a leading position in the prison as well as in the mass executions, that Iraj Mesdaghi was brought to the committee on several occasions, that on 30 July 1988 (8 murdered 1367) Hamid Noury was at the death committee, that on 6 August 1988 (15 murdered 1367) Hamid Noury brought Iraj Mesdaghi from the death committee to the death corridor, that on 9, 12 and 13 August 1988 (18, 21 and 22 murdered 1367), Hamid Noury also called out the names of the prisoners to be taken to the place of execution and brought them there and ordered guards to take the prisoners to the place of execution; that on 9, 12 and 13 August 1988 (18, 21 and 22 murdered 1367), Hamid Noury also brought the prisoners to the place of execution and ordered guards to bring them to the place of execution
16 August 1988 (25 murdered 1367) together with other perpetrators ensured that prisoners were taken to the death committee and to the execution site, that a very large number of his fellow prisoners were executed during those days including Naser Mansouri (A 31) and Mohsen Mohammad Bagher (A 95) who was executed on 6 August 1988 (15 murdered 1367), Kaveh Nasari (A 48) and Zafar Jafari Afshar (A 49) were executed on 13 August 1988 (22 murdered 1367), Mahmoud Zaki (A 34), Mansour Gharemani (A 52), Hossein Haghghatoo (A 53), Mashid Razaghi (A 54), Adel Talebi (C 3) and Mostafa Mardfard (A 82) were also executed and Iraj Mesdaghi has suffered severely. (Counsel for the plaintiff, Göran Hjalmarsson)

2. Prosecution interrogation of **Nasrullah Marandi** regarding his experiences and observations in Gohardasht prison during the period 1987 - 1989 and the reason for his imprisonment, as well as his observations of Hamid Noury at the Tehran Prosecutor's Office in the mid-1990s, *in support of Nasrullah Marandi's conviction for sympathising with the Mujahedin, that mass executions of prisoners took place in Gohardasht during the current criminal period, that the person who went by the name of Hamid Abbasi in Gohardasht prison is Hamid Noury, that Hamid Noury was involved in the mass executions of prisoners in Gohardasht prison, that Hamid Noury had a leading position in the prison and in the mass executions, that on 1 August 1988 (10 murdered 1367) Hamid Noury and others interviewed prisoners including Nasrullah Marandi in order to select those to be taken to the death committee, which subsequently led to Nasrullah Marandi being brought before the so-called death committee on 6 August 1988 (15 murdered 1367), on several occasions during the mass executions, Hamid Noury came to his office with a list and called out the names of people to be taken to the death committee, that on 6 August 1988 (15 murdered 1367) Hamid Noury read out the names of persons to be taken to the place of execution and brought these prisoners there, that among others Ali Hagverdi (A 92), Seyed Ali Vasli (A 94), Hossein Ghazvini (A 93), Ghasem Seifan (A 90) were executed on 6 August 1988 (15 murdered 1367), that Gholam Reza Kiakojsori (A 50) was executed on 16 August 1988 (25 murdered in 1367) and that Nasrullah Marandi has been subjected to severe suffering (Counsel for the plaintiff, Ghita Hadding Wiberg).*
3. Interrogation of **Masoud Ashraf Semnani** regarding his experiences and observations in Gohardasht prison in 1988 - 1989 and in Evin after the executions and the reason for his imprisonment, *in order to prove that Masoud Ashraf Semnani was convicted of sympathising with the Mujahedin, that the mass executions of prisoners took place in Gohardasht, that the execution period for Mujahedin supporters was between 30 July - 16 August 1998 (8 - 25 murdered 1367), and for leftist prisoners from 27 August 1988 (5 shahrivar), that the person who went by the name of Hamid Abbasi in Gohardasht prison is Hamid Noury, that Hamid Noury was involved in the mass executions of prisoners in Gohardasht, that Hamid Noury had a leading position in the prison and during the mass executions, that Masoud Ashraf Semnani was with the death committee twice on 9 and 12 August 1988 (18 and 21 murdered 1367) and that he saw Hamid Noury on those days and that he saw Hamid Noury bringing prisoners to the committee (9 murdered) and reading out the names of prisoners to be sent to the execution site (9 and 12 murdered), that Hamid Noury on one occasion led prisoners towards the execution site and that Masoud Ashraf Semnani suffered severely.*

(Counsel for the plaintiff Göran Hjalmarsson)

4. Examination of **Mehdi Barjesteh Garmroodi** concerning his experiences and observations in Gohardasht prison between 1986 and 1989 and in Evin after the executions and the reason for his imprisonment, *in order to prove that Mehdi Barjesteh Garmroodi was convicted of sympathising with the Mujahedin, that mass executions of prisoners took place in Gohardasht during the current criminal period, that the person who went by the name of Hamid Abbasi in Gohardasht prison is Hamid Noury, that Hamid Noury was involved in the mass executions of prisoners in Gohardasht, that Hamid Noury had a leading position in the prison and during the mass executions, that on 6-7 August 1988 (15-16 murdered 1367) Hamid Noury was involved in organising the executions of the prisoners on the occasion of their being brought before the committee and on the death row, that Hamid Noury was on death row on another occasion about two weeks later, that Hamzeh Shalalvand Borojerdy (A 5), among others, was executed and that Mehdi Barjesteh Garmroodi was brought to the Committee and subjected to severe suffering.* (Counsel for the plaintiff Göran Hjalmarsson)
5. Interrogation of **Homayoun Kaviyani** concerning his experiences and observations in Gohardasht prison during the period 1987-1989 and after the executions in Evin and the reason for his imprisonment, *in order to prove that Homayoun Kaviyani was convicted of sympathising with the Mujahedin, that mass executions of prisoners took place in Gohardasht during the current criminal period, that the person who went by the name of Hamid Abbasi in Gohardasht prison is Hamid Noury, that Hamid Noury was involved in the mass executions of prisoners in Gohardasht, that Hamid Noury had a leading position in Gohardasht, that Hamid Noury brought prisoners to the death committee, that several of Homayoun Kaviyani's fellow prisoners were executed during those days including Seyed Hossein Sobhani (A 12) and Mohammadali Elahi (A 84) and that Homayoun Kaviyani was brought to the committee and has suffered severely.* (Counsel for the plaintiff Göran Hjalmarsson)
6. Examination of **Mehdi Eshaghi**, concerning his experiences and observations in Gohardasht prison during the period 1987-1989 and in Evin for some time after the executions, and the reason for his imprisonment, *in order to prove that Mehdi Eshaghi was convicted of sympathising with the Mujahedin, that mass executions of prisoners took place in Gohardasht during the current criminal period, that the person who went by the name of Hamid Abbasi in Gohardasht prison is Hamid Noury, that Hamid Noury was involved in the mass executions of prisoners in the prison*

Gohardasht, that Hamid Noury had a leading position in Gohardasht, that Mehdi Eshaghi was brought to the committee at the end of July/beginning of August (at the beginning of the month of murder) and that Hamid Noury was then in the death corridor controlling/guarding the prisoners, that Hamid Noury called out the names of prisoners to be brought to the Killing Committee and brought them into the courtroom, that Jafar Tajaddod (A 40), among others, was executed and that Mehdi Eshaghi has suffered severely. (Counsel for the plaintiff Bengt Hesselberg)

7. Interrogation of **Mohsen Eshaghi**, regarding his experiences and observations in Gohardasht prison during the period 1986-1989 and Evin prison some time after the executions and the reason for his imprisonment *in order to prove that Mohsen Eshaghi was convicted of sympathising with the Mujahedin, that mass executions of prisoners took place in Gohardasht during the current criminal period, that the person who went by the name of Hamid Abbasi in Gohardasht prison is Hamid Noury, that Hamid Noury was involved in the mass executions of prisoners in Gohardasht, that Hamid Noury had a leading position in Gohardasht and during the mass executions, that around 1 August 1988 (10 murdered 1367) Hamid Noury read out names of persons to be brought to the so-called death committee, brought prisoners to the committee and handed over files containing information about the prisoners to the committee and that Mohsen Eshaghi was brought to the committee and subjected to a severe suffering. (Counsel for the plaintiff Göran Hjalmarsson)*

8. Interrogation of **Siamak Naderi**, regarding his experiences and observations in Evin in 1981 and in Gohardasht during the period 1987 - 1989 and the reason for his imprisonment *in order to prove that Siamak Naderi was convicted for sympathizing with the Mujahedin, that mass executions of prisoners took place in Gohardasht during the current criminal period, that the person who went by the name of Hamid Abbasi in Gohardasht prison is Hamid Noury, that Hamid Noury was involved in the mass executions of prisoners in Gohardasht, that Hamid Noury had a leading position in Gohardasht, that Hamid Noury was present on the day that Siamak Naderi was brought to the death committee, that Hamid Noury collected prisoners from Siamak Naderi's department to be taken to the committee, including on 11 August 1988 (20 murdered 1367), that Behnam Tabani (A 17) was executed, and that Siamak Naderi suffered severely. (Counsel for the plaintiff Göran Hjalmarsson)*

9. Interview with **Ali Zolfaghari** concerning his experiences and observations in Gohardasht prison during the period 1986 -1989 and

the reason why he was imprisoned, to prove that Ali Zolfaghari was convicted of sympathising with the Mujahedin, that mass executions of prisoners in Gohardasht took place during the current criminal period, that the person who went by the name of Hamid Abbasi in Gohardasht prison is Hamid Noury, that Hamid Noury was involved in the mass executions of prisoners in Gohardasht, that Hamid Noury had a leading position in Gohardasht and during the mass executions, that on 31 July 1988 (9 murdered 1367) Hamid Noury partly picked up prisoners to bring them to the death committee, that Hamid Noury asked questions of the prisoners before taking them to the committee, that he brought Ali Zolfaghari to the committee, that he called out the names of those to be executed, that about 10 to 15 days later Hamid Noury was again on death row and took Behrooz Shahi Moghani (A 57) away to be executed, that Amir Hossein Karimi (A 73), Farzin Nosrati (A 18), Masoud Khasto (A 79) and Mohsen Sadeghzadeh Ardebili (A 78), among others, were executed and that Ali Zolfaghari was subjected to severe suffering. (Bengt Hesselberg, counsel for the plaintiff)

10. Examination of **Najafi Aria Fereydoun**, concerning his experiences and observations in Gohardasht prison during 1988 - 1989 and a period before that, and the reason for his imprisonment, *in order to prove that Najafi Aria Fereydoun was convicted of sympathising with the Mujahedin, that mass executions of prisoners in Gohardasht took place during the current criminal period, that the person who went by the name of Hamid Abbasi in Gohardasht prison is Hamid Noury, that Hamid Noury was involved in the mass executions of prisoners in Gohardasht, that Hamid Noury had a leading position in Gohardasht and during the mass executions, that Hamid Noury was on death row on at least two of the days that Najafi Aria Fereydoun was taken there, that Hamid Noury brought prisoners to the committee, that Hamid Noury provided information to the Committee concerning the prisoners, that Farzin Nosrati (A 18) and Zeidollah Nourmohammadi (A 76), among others, were executed and that Najafi Aria Fereydoun suffered severely.* (Counsel for the plaintiff Göran Hjalmarsson)

11. Interrogation of **Majid Djamshidiat** concerning his experiences and observations in Gohardasht prison during the period 1986/1987 -1989, in Evin in 1983 and after the executions both in Evin prison and outside the prison and the reason for his imprisonment *in order to prove that Majid Djamshidiat was convicted of sympathising with the Mujahedin, that mass executions of prisoners in Gohardasht took place during the current period of crime, that the person who went*

under the name of Hamid Abbasi in Gohardasht prison is Hamid Noury, that Hamid Noury was involved in the mass executions of prisoners in Gohardasht, that Hamid Noury had a leading position during the mass executions, that sometime between 1-3 August 1988 (10 - 12 murdered 1367) Hamid Noury brought Majid Djamshidiat to the death committee, that Hamid Noury participated in the interrogation of prisoners with a view to selecting those to be brought to the Killing Committee, that Ramin Ghasemi (A 11) was executed and that Majid Djamshidiat suffered severely. (Counsel for the plaintiff, Bengt Hesselberg)

12. Interrogation of **Hassan Golzari** regarding his experiences and observations in Gohardasht prison during the period 1986/1987 - 1989 and the reason for his imprisonment *to prove that Hassan Golzari was convicted of sympathizing with the Mujahedin, that mass executions of prisoners in Gohardasht took place during the current criminal period, that the person who went by the name of Hamid Abbasi in Gohardasht prison is Hamid Noury, that Hamid Noury was involved in the mass executions of prisoners in Gohardasht, that Hamid Noury had a leading position in Gohardasht, that on 1 August 1988 (10 murdered 1367) Hamid Noury picked up prisoners, including Hassan Golzari, to be taken to the death committee, that Mohammed Farmani (A 110) was executed, and that Hassan Golzari has suffered severely. (Counsel for the plaintiff Bengt Hesselberg)*

13. Interrogation of **Aliakbar Bandali** regarding his experiences and observations in Gohardasht prison during 1987 - 1989 and the reason for his imprisonment *to prove that Aliakbar Bandali was convicted of sympathising with the Mujahedin, that mass executions of prisoners in Gohardasht took place during the period of the crime in question, that the person who went by the name of Hamid Abbasi in Gohardasht prison is Hamid Noury, that Hamid Noury was involved in the mass executions of prisoners in Gohardasht, that Hamid Noury fetched Mohammad Farhani who was later executed, that Hamid Noury was on death row on 16 August 1988 (25 murdered in 1367), that Mehran Hoveida (A 14), Mansour Gharemani (A 52) and Seyed Hossein Sobhani (A 12) were executed, and that Aliakbar Bandali was taken to the committee and subjected to severe suffering, among others (Private representative Kenneth Lewis)*

14. Interrogation of **Ahmad Ebrahimi** concerning his experiences and observations in Gohardasht prison during 1987 - 1989 and

the reason for his imprisonment, *in evidence that Ahmad Ebrahimi was convicted of sympathising with the Mujahedin, that mass executions of prisoners in Gohardasht took place during the current criminal period, that the person who went by the name of Hamid Abbasi in Gohardasht prison is Hamid Noury, that Hamid Noury was involved in the mass executions of prisoners in Gohardasht, that Hamid Noury was on death row when Ahmad Ebrahimi was taken there around 9 August 1988 (18 murdered 1367), that Abbas Yeghaneh (A 32), Naser Zaringhalam (A 69), Naser Saber Bechemir (A 104), Ghasem Mohebali (A 105), Mehdi Fereidooni (A 100) and Majid Moshref (A 42) were executed and that Ahmad Ebrahimi suffered severe suffering.* (Counsel for the plaintiff, Göran Hjalmarsson)

15. Interrogation of **Reza Fallahi** regarding his experiences and observations in Gohardasht prison in 1987 - 1989 and the reason for his imprisonment, *in support of his conviction for sympathising with the Mujahedin, that mass executions of prisoners in Gohardasht took place during the current criminal period, that the person who went by the name of Hamid Abbasi in Gohardasht prison is Hamid Noury, that Hamid Noury was involved in the mass executions of prisoners in Gohardasht, that Hamid Noury collected and interrogated the prisoners on 1 August 1988 (10 murdered 1367), that Hamid Noury asked for the names of the prisoners on death row and led prisoners towards the execution room on 3 August 1988 (12 murdered 1367), that Behzan Fath Zanjani (A 21) and Mohsen Rouzbahani (A 61) were executed on 3 August 1988 (12 murdered 1367), and that Hamid Noury interrogated prisoners on death row and led prisoners towards the execution room on 3 August 1988 (12 murdered 1367), that Reza Fallahi saw Hamid Noury on several occasions during the period of the crime in question, that Mohammed Farmani (A 110) and Abbas Afghan (A 22), among others, were executed, and that Reza Fallahi was brought to the Committee and subjected to severe suffering.* (Counsel for the plaintiff, Göran Hjalmarsson)

16. Interrogation of **Ramezan Fathi**, regarding his experiences and observations in Gohardasht prison during the period 1986-1989 and Evin around 1983 and the reason for his imprisonment, *in order to prove that Ramezan Fathi was convicted of sympathising with the Mujahedin, that mass executions of prisoners in Gohardasht took place during the period of the crime in question, that the person who went by the name of Hamid Abbasi in Gohardasht prison is Hamid Noury, that Hamid Noury was involved in the mass executions of prisoners in Gohardasht, that Hamid Noury had a leading position in Gohardasht, that Hamid Noury collected prisoners to be taken to the death committee, that Hamid Noury interviewed prisoners to select those to be taken to the death committee, that Hamid Noury was present at the executions in Gohardasht on 6 August 1988*

(15 murdered 1367), that Hamid Noury called out the names of the prisoners to be executed and led prisoners to the execution site, that Hamid Noury was also in Gohardasht on 30 July 1988 (8 murdered 1367) and on 5 August 1988 (14 murdered 1367), that Hamid Noury was at death committee on 16 August 1988 (25 murdered 1367), that Naser Mansouri (A 31), Kaveh Nasari (A 48), Farhad Atrak (A 60), Seyed Ali Vasli (A 94) were executed on 6 August 1988 (15 murdered 1367), that Ali Haghverdi (A 92) was executed, and that Ramezan Fathi was brought to the committee and subjected to severe suffering. (Counsel for the plaintiff, Bengt Hesselberg)

17. Prosecution interrogation of **Asghar Mehdizadeh** regarding his experiences and observations in Gohardasht prison during 1986 - 1989 and the reason for his imprisonment, *in support of Asghar Mehdizadeh's conviction for sympathising with the Mujahedin, that mass executions of prisoners in Gohardasht took place during the current criminal period, that the person who went by the name of Hamid Abbasi in Gohardasht prison is Hamid Noury, that Hamid Noury was involved in the mass executions of prisoners in Gohardasht, that Hamid Noury had a leading position in Gohardasht and during the mass executions, that on 31 July 1988 (9 murder 1367) Hamid Noury handed over forms to Asghar Mehdizadeh and others; that on 1 August 1988 (10 murder 1367) Hamid Noury picked up prisoners including Asghar Mehdizadeh and took them to the death row; that on the same day Hamid Noury called out the names of prisoners and took prisoners to the place of execution; and that Hamid Noury was involved in the execution of the prisoners, that on 3 August 1988 (12 murdered 1367) and 6 August 1988 (15 murdered 1367) Hamid Noury collected prisoners to be taken to the death committee, that on 9 August 1988 (18 murdered 1367) Hamid Noury was in the execution room and kicked away chairs so that prisoners were hanged, and that Asghar Mehdizadeh was subjected to severe suffering. (Counsel for the plaintiff Ghita Hadding Wiberg)*

18. Interrogation of **Majid Saheb Jam Atabaki** regarding his experiences and observations in Gohardasht prison in 1988 - 1989, in Evin before and after the executions and at the Tehran Prosecutor's Office in 1992 - 1993 and the reason for his imprisonment, *in support of his conviction for sympathising with the Mujahedin, that mass executions of prisoners in Gohardasht took place during the current criminal period, that the person who went by the name of Hamid Abbasi in Gohardasht prison is Hamid Noury, that Hamid Noury was involved in the mass executions of prisoners in Gohardasht, that on 6 and 13 August 1988 (15 and 22 murdered in 1367) Hamid Noury called out the names of the prisoners to be taken to Gohardasht prison, that Hamid Noury was involved in the mass executions of prisoners in Gohardasht prison, that Hamid Noury was involved in the mass*

*executions of prisoners in Gohardasht prison, that Hamid Noury
called out the names of the prisoners to be taken to Gohardasht prison*

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

19. Examination of **Hossein Farsy** concerning his experiences and observations in Gohardasht prison in 1988 - 1989 and in Evin and the reason for his imprisonment, *in order to prove that Hossein Farsy was convicted of sympathising with the Mujahedin, that mass executions of prisoners in Gohardasht took place during the current criminal period, that the person who went by the name of Hamid Abbasi in Gohardasht prison is Hamid Noury, that Hamid Noury was involved in the mass executions of prisoners in Gohardasht, that Hamid Noury brought prisoners to be executed on 30 July and 9 August 1988 (8 and 18 murdered 1367), that Hamid Noury called out names to be brought to the place of execution on 12 August 1988 (21 murdered 1367), that Hamid Noury called out names and took prisoners to the execution site on 13 August 1998 (22 murdered 1367), that a large number of fellow prisoners including Mahmoud Meimanat (A 6) were executed, and that Hossein Farsy was taken to the Committee and subjected to severe suffering. (Counsel for the plaintiff Ghita Hadding Wiberg)*

20. Interrogation of **Mohammed Zand** concerning his experiences and observations in Gohardasht prison in 1988 - 1989 and a period before that, in Evin after the executions and in Tehran in the winter of 1995 and the reason for his imprisonment, *to prove that Mohammed Zand was convicted of sympathising with the Mujahedin, that mass executions of prisoners in Gohardasht took place during the current criminal period, that the person who went by the name of Hamid Abbasi in Gohardasht prison is Hamid Noury, that Hamid Noury was involved in the mass executions of prisoners in Gohardasht, that Hamid Noury read out the names of prisoners to be executed on 6 and 9 August 1988 (15 and 18 murdered in 1367), that on 13 or 14 August 1988 (22 or 23 murdered in 1367) Hamid Noury, together with others, came to Mohammed Zand's cell and threatened that he would be executed, that Mohammed Zand's brother Reza Zand (A 13), Ramin Ghasemi (A 11), Mehran Hoveida (A 14) and Seyed Hossein Sobhani (A 12) were brought to Mohammed Zand's cell*

on 30 July 1988 (8 murdered 1367) from the department and executed on 31 July (9 murdered), that Naser Mansouri (A 31) was executed on 6 August (15 murdered), that Dariush Hanifehpour (A 44) and Mahmoud Zaki (A 34) were executed and that Mohammed Zand was taken to the committee and subjected to severe suffering (Private representative Kenneth Lewis).

21. Interrogation of **Akbar Samadi** regarding his experiences and observations in Gohardasht prison in 1988 - 1989 and the reason for his imprisonment, *in order to prove that Akbar Samadi was convicted of sympathising with the Mujahedin, that mass executions of prisoners in Gohardasht took place during the current criminal period, that the person who went by the name of Hamid Abbasi in Gohardasht prison is Hamid Noury, that Hamid Noury was involved in the mass executions of prisoners in Gohardasht, that Hamid Noury brought Akbar Samadi to the death committee on 3, 9, 13 and 27 August 1988 (12, 18 and 22 murdered and 5 sharivar 1367), that Hamid Noury called out the names of prisoners to be taken to the execution site on 6 August 1988 (15 murdered 1367), that among others Reza Zand (A 13), Seyed Hossein Sobhani (A 12), Taher Haghighat Talab (A 38), that Hamid Noury had been involved in the execution of the prisoners in the execution camp on 6 August 1988 (15 murdered 1367), Alireza Sepasi (A 26), Faramarz Jamshidian (A 109) and Ebrahim Akbarisefat (A 46), that Roshan Bolbolian (A 43), Dariush Hanifehpour (A 44) and Mohammad Darvishnouri (A 108) were executed on 13 August 1988 (22 murdered 1367), and that Akbar Samadi was subjected to severe suffering. (Counsel for the plaintiff, Göran Hjalmarsson)*
22. Interrogation of **Mahmoud Royaie** concerning his experiences and observations in Gohardasht prison in 1986 - 1989 and in Evin in 1989 - 1990 and the reason for his imprisonment, *in order to prove that Mahmoud Royaie was convicted of sympathising with the Mujahedin, that mass executions of prisoners in Gohardasht took place during the current criminal period, that the person who went by the name of Hamid Abbasi in Gohardasht prison is Hamid Noury, that Hamid Noury was involved in the mass executions of prisoners in Gohardasht, that Hamid Noury had a leading position in Gohardasht and during the mass executions, that Hamid Noury called out the names of the prisoners to be executed on 3 August 1988 (12 murdered 1367), that Reza Zand (A 13), Seyed Hossein Sobhani (A 12), Asghar Masjedi (A 15), Mehran Hoveida (A 14) and Masoud Kabari (A 4) were taken from the ward on 30 July 1988 (8 murdered 1367) and subsequently executed, that, inter alia, Mohamed Reza Hejazi (A 56) and Roshan Bolbolian (A 43) were executed, and that Mahmoud Royaie was brought to the Committee and subjected to severe suffering. (Göran Hjalmarsson, counsel for the plaintiff)*

Plaintiff whose relatives were executed

1. Hearing of the plaintiff **Mokhtar Borojerdy Shalavand** concerning and *in support of the execution in Gohardasht of his brother Hamzeh Shalavand Borojerdy (A 5), who sympathised with the Mujahedin, in connection with the mass executions of 1988* (Counsel for the plaintiff Ghita Hadding Wiberg)
2. Hearing of the plaintiff **Mahnaz Meimanat** concerning and *in support of the fact that his brother Mahmoud Meimanat (A 6), who sympathised with the Mujahedin, was executed in Gohardasht in connection with the mass executions* (Counsel for the plaintiff Ghita Hadding Wiberg).
3. Examination of **Mehri Haji-Nejad** concerning and *in support of the fact that her brother Ali Haji Nejad (A 7), who sympathised with the Mujahedin, was executed in Gohardasht in connection with the mass executions* (Counsel for the plaintiff Ghita Hadding Wiberg).
4. Examination of **Khadijeh Borhani** concerning and *in support of the fact that her brother Saied Mohammad Hussein Borhani (A 8), a Mujahedin sympathiser, was executed in Gohardasht in connection with the mass executions* (Private counsel Kenneth Lewis).
5. Examination of **Seyyed Jafar Mir-Mohammadi Berenjestanaki** concerning and *in support of the fact that his brother Seyyed Agil Mir-Mohammadi Berenjestanaki (A 9), convicted of sympathising with the Mujahedin, was executed in Gohardasht in connection with the mass executions.* (Counsel for the plaintiff Ghita Hadding Wiberg)
6. Examination of **Hossein Seyed Ahmadi** concerning and *in support of the fact that his brother Mohsen Seyyed Ahmadi (A 10), convicted of sympathising with the Mujahedin, was executed in Gohardasht in the context of the mass executions* (Private counsel Kenneth Lewis).

7. Examination of **Sara Rouzdar** concerning and *in support of the fact that her brother Adel Rouzdar (C 1), who sympathised with the Tudeh Party, was executed in Gohardasht in connection with the mass executions (Göran Hjalmarsson, counsel for the plaintiff).*

8. Interrogation of **Sahra Nikoo** concerning and *in support of the fact that her brother Heidar Nikoo (C 4), a sympathiser of the Tudeh Party, was executed on 28 August 1988 (6 Sharivar 1367) in Gohardasht during the mass executions and that her brother was imprisoned in Gohardasht together with Adel Rozdar. (Counsel for the plaintiff Göran Hjalmarsson)*

9. Hearing of the plaintiff **Sedigheh Haji Mohsen** concerning and *in support of the fact that her brother Hosein Haji Mohsen (C 2), who was an atheist and/or leftist, was executed in Gohardasht on 27 August 1988 (5 Shahrivar 1367) during the mass executions (Bengt Hesselberg, counsel for the plaintiff).*

10. Hearing of the plaintiff, **Esmat Talebi Kalhoran**, concerning and *in support of the fact that her brother Adel Talebi (C 3), who sympathised with Rah-e Kargar, was executed in Gohardasht in connection with the mass executions (Counsel for the plaintiff, Ghita Hadding Wiberg).*

11. Hearing of the plaintiff **Vida Rostamalipour** concerning and *in support of the fact that her husband Majid Ivani (C 5), who sympathised with Fedayan, was executed in Gohardasht in connection with the mass executions (Bengt Hesselberg, counsel for the plaintiff).*

12. Hearing of the plaintiff **Laleh Bazargan** concerning and *in support of the fact that her brother Bijan Bazargan (C 6), who sympathised with the Etehadiye Communistha, was executed in Gohardasht in connection with the mass executions (Bengt Hesselberg, counsel for the plaintiff).*

13. Examination of **Solmaz Alizadeh** concerning and *in support of the fact that her father Mahmoud Alizadeh Azami (C 7), who sympathised with Fedayan, was executed in Gohardasht in connection with the mass executions (Bengt Hesselberg, counsel for the plaintiff).*

Witnesses

1. Testimony of **Rahmat Ali Karami** (Mujahedin) regarding his experiences and observations in Gohardasht prison and in Evin during the period 1983, 1987 - 1991, *in support of the mass executions of prisoners in Gohardasht during the current criminal period, that the person who went by the name of Hamid Abbasi in Gohardasht prison is Hamid Noury, that Hamid Noury was involved in the mass executions of prisoners in Gohardasht, that Hamid Noury had a leading position in Gohardasht, that Hamid Noury brought prisoners to the death committee, that Hamzeh Shalavand Borojerdy (A 5), among others, was involved in the mass executions of prisoners in Gohardasht, Ebrahim Akbarisefat (A 46), Akbar Shakeri (A 30), Dariush Hanifepour (A 44), Jalal Layeghi (A 29), Iraj Lashgari (A 74), Hadi Saberi (A 51), Reza Falanik (A 28), Hossein Niakan (A 45), Abolghasem Arzhangi (A 47), Mohsen Mohammadbagher (A 95), Gholam Reza Kiakojori (A 50), Mohammad Reza Deljoy (A 75), Ahmad Naalbandi (A 97), Jafar Tajaddod (A 40), Mohammad Jangzade (A 98), Majid Moshref (A 42), Rahman Cheraghi (A 99), Ali Bakali (A 96), Mahmud Abbasi (A 101), Manouchehr Rezaie (A 41), Afshin Alavi (A 101) and Nemat Eghbali (A 39) were all executed.*
2. Testimony of **Manoochehr Eshaghi** (Mujahedin), regarding his experiences and observations in Gohardasht prison during the period 1987 -1989 and in Evin after the executions, *in proof of the mass executions of prisoners in Gohardasht during the current criminal period, that the person who went by the name of Hamid Abbasi in Gohardasht prison is Hamid Noury, that Hamid Noury was involved in the mass executions of prisoners in Gohardasht, that Hamid Noury held a leading position in Gohardasht, that Hamid Noury brought prisoners from Jihad ward to be taken to the death committee, that Majid Moshref (A 42), Mehdi Fereidooni (A 100) and Ali Bakali (A 96), among others, were executed, - that Hamid Noury was involved in the mass executions of prisoners in Gohardasht, that Hamid Noury held a leading position in Gohardasht*
3. Testimony of **Hamid Ashtari** (Mujahedin) regarding his experiences and observations in Gohardasht prison during 1987 - 1989, *in support of the mass executions of prisoners in Gohardasht during*

current criminal period, that the person who went by the name of Hamid Abbasi in Gohardasht prison is Hamid Noury, that Hamid Noury had a leading position in Gohardasht and that Hamid Noury was in Gohardasht at the time of the executions and participated in the mass executions.

4. Testimony of **Hassan Ashrafi** (Mujahedin) regarding his experiences and observations in Gohardasht prison from 1986 to 1989, *in support of the mass executions of prisoners in Gohardasht during the current criminal period, that the person who went by the name of Hamid Abbasi in Gohardasht prison is Hamid Noury, that Hamid Noury was involved in the mass executions of prisoners in Gohardasht and that Mansour Ghahremani (A 52), Mahmoud Meimanat (A 6), among others, were executed.*
5. Testimony of **Mohammad Khodabandehloee**, (Mujahedin) regarding his experiences and observations in Gohardasht prison 1986 - 1988 and in Evin in 1988, *in evidence of the mass executions in prisons in Iran during the current criminal period, that Hamid Abbasi worked in Gohardasht during the time Mohammad Khodabandehloee was incarcerated there until June 1988, that Hamid Abbasi participated in a beating which resulted in Mohammad Khodabandehloee losing the sight in one eye, and that Hamid Abbasi came to Evin prison sometime during July/August 1988 to look for Mohammad Khodabandehloee.*
6. Testimony of **Reza Shemirani** (Mujahedin) regarding his experiences and observations in Evin Prison 1987-1989, *in evidence of the mass executions in prisons in Iran during the current criminal period, that the person who went by the name of Hamid Abbasi in Gohardasht Prison is Hamid Noury, that Hamid Noury was involved in the mass executions in Gohardasht, and that after the executions Hamid Noury came to Evin in connection with the transfer of the prisoners who survived the executions in Gohardasht, and that he held a leading position in the prison.*
7. Testimony of **Mohsen Zadshir** (Mujahedin) regarding his experiences and observations in Gohardasht Prison 1986 - 1989, *in proof of the mass executions of prisoners in Gohardasht during the current criminal period, that the person who went by the name of Hamid Abbasi in Gohardasht Prison is Hamid Noury, that Hamid Noury was involved in the mass executions of prisoners in Gohardasht, that Ramin Ghasemi (A 11), Manouchehr Bozorgbashar (A 16), Ali Reza Sepasi (A 26), Mohsen Roosbahani (A 61), Naser Barzegar (A 25), among others,*

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

8. Testimony of **Abdolreza Shahab Shokoohi** (Rah-e Kargar) regarding his experiences and observations in Gohardasht Prison in 1988 - 1989, *in proof of the mass executions of prisoners in Gohardasht during the current criminal period, that the person who went by the name of Hamid Abbasi in Gohardasht Prison is Hamid Noury, that Hamid Noury was involved in the mass executions of prisoners in Gohardasht, that Hamid Noury together with the guards at the end of July 1988 (beginning of the murdered month 1367) took the television set from the witness' room, that Hamid Noury, after the second occasion on which the witness was brought before the death committee, ordered the guards to whip the prisoners who survived and that Hamid Noury stated that if they did not learn to pray they would be executed after three days, and that Adel Talebi (C 1), Jafar Riahi (C 13) and Sadek Rihai (C 14), Mostafa Farhadi (C 16), among others, were executed.*

9. Testimony of **Maleki Hossein** (Forqan Group) regarding his experiences and observations in Gohardasht Prison during 1988 - 1989 and after the executions in Evin Prison, *in support of the mass executions of prisoners in Gohardasht Prison during the current criminal period, that the person who went by the name of Hamid Abbasi in Gohardasht Prison is Hamid Noury, that Hamid Noury had a leading position in the prison, that Hamid Noury was in Gohardasht prison during the period of the crime, and that Hamid Noury was involved in the mass executions of prisoners in Gohardasht prison and, together with others, selected the prisoners to be brought to the death committee.*

10. Testimony of **Seyed Jalalaldin Saidi** (Rah-e Kargar) regarding his experiences and observations in Gohardasht prison from 1986 to 1989, *in support of the mass executions of prisoners in Gohardasht during the current criminal period, that the person who went by the name of Hamid Abbasi in Gohardasht prison is Hamid Noury, that Hamid Noury had a leading position in Gohardasht, that Hamid Noury was involved in the executions, and that Ahmed Beik Mohammadi (A 106), Jafar Rihai (C 13), Sadek Riahi (C 14), among others, were executed.*

11. Testimony of **Mehrdad Neshati Malekyans** (Fadayan Khalg) regarding his experiences and observations in Gohardasht prison 1986 - 1989, *in support of the mass executions of prisoners in Gohardasht during the current criminal period, that Mehrdad Neshati Malekyans on August 30*

In 1988 (8 Shahrivar 1367), Hamid Abbasi's voice was heard in connection with the questioning of prisoners, including the video interview. and that Homoiyon Azadi (C 17), Jahanbackish Sarkhosh (C 8), Hamid Nasiri(C 23), Madjid Walid (C 18), Behzad Omrani (C 19) and Mohamed Ali Behkish (C 20) were executed, among others.

12. Testimony of **Abolghassem Soleiman Pour** (Vahdat Koministi) regarding his experiences and observations in Gohardasht prison in 1987 - 1989 and in Evin in 1989, *in support of the mass executions of prisoners in Gohardasht during the current criminal period, that the person who went by the name of Hamid Abbasi in Gohardasht prison is Hamid Noury, that Hamid Noury was involved in the mass executions of prisoners in Gohardasht, that around 31 August 1988 (9 Shahrivar 1367) Hamid Noury picked up prisoners, including Abolghassem Soleiman Pour to be interviewed before they were taken to the death committee, that Hamid Noury whipped the prisoners in the process, that Hamid Noury then took the prisoners to the corridor outside the death committee and brought them to the committee, that Hamid Noury took prisoners to the execution site, that Hamid Noury ordered a guard to carry out a sentence of 60 lashes imposed on Abolghassem Soleiman Pour by the Killing Committee, and that Hosein Haji Mohsen (C 2) was a prisoner at Gohardasht during the mass executions.*

13. Testimony of **Payvand Manouchehr** (Fadayan) regarding his experiences and observations in Gohardasht prison during 1986 - 1989 and in Evin before the executions, *in proof of the mass executions of prisoners in Gohardasht during the current criminal period, that the person who went by the name of Hamid Abbasi in Gohardasht prison is Hamid Noury, that Hamid Noury was involved in the mass executions of prisoners in Gohardasht, that Hamid Noury called up prisoners sometime between 29 and 31 August 1988 (7-9 Shahrivar 1367) and brought them to the death committee, and that Hamid Noury brought prisoners to the place of execution.*

14. Testimony of **Azarnoush Hemmati Elizehee** (Peykar) regarding his experiences and observations in Gohardasht Prison during 1988 - 1989, *in support of the mass executions of prisoners in Gohardasht during the current criminal period, that the person who went by the name of Hamid Abbasi in Gohardasht prison is Hamid Noury, that Hamid Noury was involved in the mass executions of prisoners in Gohardasht, that Hamid Noury picked up prisoners to be taken to the committee, that Hamid Noury questioned prisoners before they are to be taken to the death committee, that Hamid Noury was involved in the mass executions of prisoners in Gohardasht, that Hamid Noury was involved in the mass executions of prisoners in Gohardasht, that*

Hamid Noury was present in the room when Azarnoush Hemmati Elizehee was brought before the death committee, as well as the execution of Abbas Raiisi (C 12), among others.

15. Testimony of **Afsham Roum** (Etehadie Kommunistha) regarding his experiences and observations in Gohardasht prison from 1986 to 1989, *in proof of the mass executions of prisoners in Gohardasht during the current criminal period, that the person who went by the name of Hamid Abbasi in Gohardasht prison is Hamid Noury, that Hamid Noury was involved in the mass executions of prisoners in Gohardasht, that Hamid Noury brought prisoners to the death row and interrogated them there regarding, inter alia, their religious beliefs, and that Hamid Noury ordered guards to beat prisoners.*

16. Testimony of **Mehdi Aslani Tabrizipoor** (Fadayan Khalq) regarding his experiences and observations in Gohardasht Prison during 1986-1989, *in proof of the mass executions of prisoners in Gohardasht during the current criminal period, that the person who went by the name of Hamid Abbasi in Gohardasht Prison is Hamid Noury, that Hamid Noury was involved in the mass executions of prisoners in Gohardasht, and that Hamid Noury selected the prisoners to be taken to the death committee and brought prisoners to the death corridor on 28 August 1988 (6 Sharivar 1367).*

17. Testimony of **Amir Houshang Atiabi** (left) regarding his experiences and observations in Gohardasht prison in 1988 - 1989, *in evidence of the mass executions of prisoners in Gohardasht during the current criminal period, that among others Adel Rozdar (C 1) and Heidar Nikoo (C 4) were executed and that a person named Rahimi was not the same person referred to by others as Hamid Abbasi.*

18. Testimony of **Mansour Kamalzadeh** (Peykar) regarding his experiences and observations in Gohardasht prison in 1988 - 1989 and in Evin in 1989 - 1991, *in proof of the mass executions of prisoners in Gohardasht during the current criminal period and that the person who went by the name of Hamid Abbasi in Gohardasht prison is Hamid Noury.*

19. Testimony of **Rahman Darkeshide** (Fadayan) regarding observations of Hamid Noury in Tehran in 1359 and his experiences and observations in Evin in 1986 and Gohardasht in 1988 - 1989, *to*

evidence of mass executions of prisoners in Gohardasht prison during the current criminal period, that the person who went by the name of Hamid Abbasi in Gohardasht prison is Hamid Noury, that Mahmoud Ghazi (C 9), Mohsen Rajabzadeh (C 11), Mahmoud Behkish (C 21), Mohamed Ali Behkish (C 20) and Majid Ivani (C 5) were executed, among others.

20. Testimony of **Ali Reza Omid Meaf** (Fadayan Khalg) regarding his experiences and observations in Gohardasht in 1988 - 1989 and in Evin prison after the executions *to substantiate the mass executions of prisoners in Gohardasht during the current criminal period, that Hamid Abbasi was involved in the mass executions of prisoners in Gohardasht, that on 4 or 5 September 1988 (13 or 14 Shahrivar 1367) Hamid Abbasi interviewed prisoners in order to select those to be executed, and that on the same day Ali Reza Omid Meaf and his fellow prisoners were beaten by Hamid Abbasi and others.*
21. Testimony of **Ali Reza Akbari-Sepher** (Fadayan Khalg) regarding his experiences and observations in Evin Prison in 1983 - 1985 and in Gohardasht Prison in 1986 - 1988, *in support of the mass executions of prisoners in Gohardasht during the current criminal period, that the person who went by the name of Hamid Abbasi in Gohardasht Prison is Hamid Noury, and that Hamid Noury was involved in the mass executions by attending interviews of prisoners and bringing prisoners to the Committee in late August and part of September 1988.*
22. Testimony of **Mahmud Kahlili** (Sazmane Cherikhaye) regarding his experiences and observations in Gohardasht prison during the period 1986-1989, *in proof of the mass executions of prisoners in Gohardasht during the current criminal period, that the person who went by the name of Hamid Abbasi in Gohardasht prison is Hamid Noury, that Hamid Noury was involved in the mass executions of prisoners in Gohardasht, that Hamid Noury had a leading position in Gohardasht, that Hamid Noury was at the death row on 27 August 1988 (5 Shahrivar 1367), that Hossein Haji Mohsen (C 2) was imprisoned in Gohardasht in connection with the executions, that Kayvan Mostafavi (C 10), Mohammad Ali Pezhman (C 15), Mohamed Ali Behkish (C 20), Mahmoud Behkish (C 21) were executed, among others.*
23. Testimony of **Nader Haddadi Moghadam** (Fadayan Khalg) regarding his experiences and observations in Gohardasht prison

during the period 1987-1989, *in support of the mass executions of prisoners in Gohardasht during the current criminal period, that Hamid Abbasi was involved in the mass executions by picking up prisoners together with others to bring them down to the death committee on 31 August 1988 (9 Shahrivar 1367), and that Jafar Rihai (C 13), Sadek Riahi (C 14), Mostafa Farhadi (C 16), among others, were executed.*

24. Testimony of **Muhammad Esad-Djou** (left) regarding his experiences and observations in Gohardasht prison during the period 1988 - 1989, *in proof of the mass executions of prisoners in Gohardasht during the current criminal period, that the person who went by the name of Hamid Abbasi in Gohardasht prison is Hamid Noury, that Hamid Noury was involved in the mass executions of prisoners in Gohardasht, that on 31 August 1988 (9 Shahrivar 1367) Hamid Noury took prisoners from the department in order to select the prisoners to be taken to the death committee, that Hamid Noury took prisoners to the place of execution, and that Hamid Nasiri (C 23), Majid Ivani (C 5), Homoiyon Azadi (C 17), Behzad Omrani (C 19), Jafar Riahi (C 13), Sadek Riahi (C 14), Mostafa Farhadi (C 16), among others, were executed.*

25. Testimony of **Jafar Yaghoobi**, (Fadayan) regarding his experiences and observations in Gohardasht Prison 1986 - 1989, *in support of the mass executions of prisoners in Gohardasht during the current criminal period, that Hamid Abbasi had a leading position in Gohardasht, that Hamid Abbasi was involved in the mass executions by handing over prisoners' files to the Committee on 30 August 1988 (8 Shahrivar 1367), and that Ebrahim Najaran (C 22) and Hosein Haji Mohsen (C 2), among others, were executed*

26. Testimony of **Mehrzad Dashtbani** (Peykar) regarding his experiences and observations in Gohardasht and Evin in 1986 - 1989, *in support of the mass executions of prisoners in Gohardasht during the current criminal period, that Hamid Abbasi had a leading position, that Hamid Abbasi served in both Gohardasht and Evin and that Adel Rouzdar (C 1), Hosein Haji Mohsen (C 2), Bijan Bazargan (C 6), Mahmoud Ghazi (C 9), Kayvan Mostafavi (C 10), Mohsen Rajabzadeh (C 11), Mohammad Ali Pezhman (C 15), Madjid Walid (C 18), Mahmoud Behkish (C 21) and Sasan Ghandi (C 25), among others, were executed.*

Witnesses relating to the general part

1. Hearing of **Kaveh Moussavi** regarding his participation in the notification to the Prosecution in Sweden that Hamid Noury could be suspected of crimes under international criminal law, his appearances in the media to draw attention to the fact that Hamid Noury was detained in Sweden and his knowledge of the structure and hierarchy of the personnel working in the Iranian prisons during the current criminal period, *in order to substantiate the mass executions of prisoners in Iran during the current criminal period and that Hamid Noury participated in these executions*
2. Interview with lawyer **Rebecca Mooney** regarding her involvement in the notification to the Prosecution in Sweden that Hamid Noury could be suspected of crimes under international criminal law, *in evidence of the mass executions of prisoners in Iran during the current criminal period and that Hamid Noury participated in these executions.*
3. Testimony of Queens Counsel **Geoffrey Robertsson** regarding his work on the report "The Massacre of Political Prisoners in Iran 1988", *in support of the mass executions of prisoners in Iran during the summer of 1988 and that the executions constituted crimes under international criminal law.*
4. Interview with **Shadi Sadr**, founder of the organisation "Justice for Iran" regarding her knowledge of the mass executions in Iran in the summer of 1988, her work with Amnesty International on the reports "Criminal Cover - up" and "Blood - Soaked Secrets" and her contacts with people who have stated that they have information about Hamid Noury and her knowledge of the Iranian judicial system, *in support of the mass executions of prisoners in the summer of 1988 in Iran, that the executions had no legal basis under Iranian law, that the assistant prosecutor and his deputy had legal authority in the prison, that the name of Abbasi was revealed in interviews before Hamid Noury was arrested and that the prisoners who were executed were not afforded the basic requirements of a fair trial.*

5. Testimony of **Payam Akhavan**, Professor of International Law at McGill University in Montreal, regarding his knowledge of Iranian justice and the Iranian regime's actions against the opposition in the 1980s, and his work with the Iranian Tribunal, where he was head of the prosecution team, *to substantiate the mass executions of prisoners in Iran and their extent, that the prisoners executed were not afforded the basic requirements of a fair trial, that the executions constituted crimes under international criminal law, that there was a link between the Mujahedin's collaboration with Iraq in the armed conflict and the decision to execute prisoners sympathetic to the Mujahedin, and that the Iranian regime tried for a long time to keep these executions secret.*

Expert witness

1. Testimony of **Rouzbeh Parsi**, Institute of Foreign Policy, on the political situation in Iran during 1979-1988, *in support of the power struggle between different political groups in Iran during the 1980s, the various schemes of the regime to stifle the opposition, the development of the Iran-Iraq war and the mass executions of political prisoners in the summer of 1988.*
2. Testimony of Professor **David Thurfjell** regarding and *in support of the historical and religious background to the mass executions in Iran in 1988 and the religious and political system of the Islamic Republic, as well as the fatwa/hukm issued by Khomeini in July 1988 and its consequences.*
3. Examination of Professor **Jann K. Kleffner** concerning his knowledge of the circumstances determining the existence of an armed conflict and how to classify it, *in order to prove that there was an international armed conflict between Iran and Iraq during the relevant criminal period and that the Mujahedin were involved in this armed conflict and that the Mujahedin had a sufficient degree of organisation and that the armed violence between Iran and the Mujahedin was also of such intensity that there was also a non-international armed conflict.*

4. Examination of LL.M **Sally Longworth** concerning her knowledge of the circumstances determining the existence of an armed conflict and its classification, *in support of her contention that there was an international armed conflict between Iran and Iraq during the relevant time of the offence and that the Mujahedin were involved in that armed conflict and that the Mujahedin had a sufficient degree of organisation and that the armed violence between Iran and the Mujahedin was also of such intensity that there was also a non-international armed conflict.*
5. Testimony of Professor Emeritus **Ove Bring** on the legal regulation of international crimes in general and the assessment of its applicability to the executions, torture and inhuman treatment of prisoners belonging to/participating with the Mujahedin in Iran in the summer of 1988, *in order to prove that these acts are to be considered as international crimes.*
6. Testimony of Professor **Mark Klamberg** on the legal regulation of international crimes in general and the assessment of its applicability to the executions, torture and inhuman treatment of prisoners belonging to/sympathising with the Mujahedin in Iran in the summer of 1988, *in support of the assessment that these acts constitute international crimes.*
7. Testimony of **Torun Lindholm**, regarding the ability to remember, *in order to prove that it is possible for witnesses to account for memories dating back more than thirty years and made under severe stress.*

Written evidence

It is requested that the Court of First Instance, in accordance with Chapter 46(6)(4) of the Code of Judicial Procedure, allow the written evidence to be adduced by reference to the case-file. Much of the written evidence will be presented orally at the main hearing - albeit in a more summarised form.

1. Notification received from McCUE&PARTNERS law firm regarding *and in support of how Hamid Noury came to be suspected of aggravated international crimes and murder and the information provided in connection with the notification including photographs depicting Hamid Noury*, main minutes pages 11 - 42, 103, 121 - 140.
2. Statement from Professor Jann K. Kleffner, dated 24 April 2020, concerning the circumstances determining the assessment of the existence of an armed conflict and its classification *as evidence that there was an international armed conflict between Iran and Iraq during the relevant criminal period and that the Mujahedin was involved in this armed conflict and that the Mujahedin had a sufficient degree of organisation and that also the armed violence between Iran and the Mujahedin was of such intensity that there was also a non-international armed conflict*, pages 1 - 18 of Protocol Annex H2.
3. Statement by LL.M Sally Longworth, dated 15 September 2020, and additional opinion, dated 9 November 2020, regarding the circumstances that determine the assessment of whether an armed conflict exists and how it should be classified, *in support of a finding that there was an international armed conflict between Iran and Iraq during the relevant criminal period and that the Mujahedin were involved in that armed conflict and that the Mujahedin had a sufficient degree of organisation and that the armed violence between Iran and the Mujahedin was also of such intensity that there was also a non-international armed conflict*, pages 37 to 50 of Protocol Annex H2 and page 189 of the main Protocol.
4. Submission by Professor Mark Klamberg, dated 24 March 2020, regarding the legal regime for international crimes in general and the assessment of its applicability to the executions of prisoners belonging to/sympathising with the Mujahedin in Iran in 1988, *in support of the assessment that these acts constitute international crimes*, pages 49 - 75 of Protocol Annex H1.
5. Opinion, dated 12 February 2020, and follow-up memorandum, dated 20 May 2020, from Professor Emeritus Ove Bring regarding the legal regime for international crimes in general and the assessment of its applicability to the executions of prisoners belonging to/sympathising with the Mujahedin, *in support of the assessment that these acts constitute international crimes*, pages 103 - 107, 113 - 116 of Protocol Annex H1.

6. Statement, dated 21 April 2020, by Rouzbeh Parsi, Institute of Foreign Policy, on the political situation in Iran in 1979-1988, *in support of the power struggle between different political groups in Iran during the 1980s and the various schemes of the regime to stifle the opposition, the development of the Iran-Iraq war and the mass executions of political prisoners in the summer of 1988*, pages 1-10 of Protocol Annex H1.
7. Opinion of Professor David Thurfjell, dated 20 February 2020, regarding and *in support of the historical and religious background to the mass executions in Iran in 1988 and the religious and political system of the Islamic Republic, as well as the fatwa/hukm issued by Khomeini in July 1988 and its consequences*, pages 21 - 34 of Protocol Annex H1.
8. Report from the Ministry for Foreign Affairs, "Human Rights, Democracy and the Rule of Law in Iran 2015-2016", regarding and *in support of the existence of serious human rights deficiencies in Iran, as well as serious deficiencies in the rule of law, torture and forced confessions*, pages 1-17 of Protocol Annex J2.
9. Report of the Iran Tribunal "Findings of the Truth Commission", regarding the interviews conducted on 18 - 22 June 2012 in London, *to substantiate the conditions in various detention facilities and prisons around Tehran during the 1980s, that mass executions of prisoners took place in Iran and in Gohardasht during the current criminal period, who were the leadership of Gohardasht and who were involved in the mass executions, including Hamid Noury, that the Iranian regime violated fundamental human rights and carried out extrajudicial executions, that the plaintiffs and witnesses Vida Rostamalipour, Hossein Maleki, Rahman Darkeshideh, Mokhtar Shalalvand, Hamid Ashtari, Homayoun Kaviyani in 2012 testified about the mass executions and co-prisoners executed, that the executions are contrary to international criminal law and that Manouchehr Rezaii (A 41,) Bijan Bazargan (C 6) and Eberahim Najaran (C 22) were executed* page 1 - 431 of the minutes annex J1.
10. Judgment of the Iran Tribunal Concerning and *in Support of the Mass Executions of Prisoners in Iran during the Current Criminal Era and that the Executions are in Violation of International Criminal Law*, pp. 161 - 212 Protocol Annex J2.
11. The Iranian Tribunal's list of prisoners executed in the summer of 1988 *in support of the mass executions of prisoners in Iran during the summer*

1988, and that several of the prisoners whose names appear in Annexes A and C were executed, pages 74 to 165 of Appendix J3 to the minutes.

12. United Nations General Assembly Official Records of the 43rd Session, 43/147, concerning Human Rights in Iran, 8 December 1988, *in support of the mass executions of prisoners in Iran during the current criminal era and Iran's failure to respect human rights, pages 155 - 156 Protocol Annex J2.*
13. Report by Geoffrey Robertsson "The Massacre of Political Prisoners in Iran, 1988", regarding *and in support of the mass executions of prisoners in Iran during the current criminal period and the background to it, that there is a nexus between the mass executions of Mujahedin prisoners and the Eternal Light attack, that the mass executions constituted crimes under international criminal law, that the plaintiffs and witnesses Abdolreza Shahab Shokoohi, Hamid Ashtari, Mehrdad Neshati Malekians, Iraj Mesdaghi were interviewed in 2009 about their experiences during the mass executions in Gohardasht prison, and that Mehrdad Ashtari (A 1), Shahram Shahbakhshi (A 2) and Anusheh Taheri (C 26) were executed in Gohardasht, pages 1020 - 1161 of Annex J1 to the minutes.*
14. Abdorrahman Boroumand Foundation Report "The Massacre of Political Prisoners in Iran, 1988: An Addendum. Witness Testimonies and Official Statements", regarding *and in support of the mass executions of prisoners in Iran during the current criminal era, the Iranian regime's actions and statements regarding the mass executions, that there is a nexus between the mass executions of Mujahedin prisoners and the Eternal Light attack, that the mass executions constituted crimes under international criminal law, that the plaintiffs and witnesses Abdolreza Shahab Shokoohi, Hamid Ashtari, Mehdi Aslani, Mehrdad Neshati Malekians, Iraj Mesdaghi, Manoochehr Eshaghi, Hossein Maleki were interviewed in 2009 about their experiences during the mass executions in Gohardasht prison; that, among others, Ahmad Nouramin (A 58), Behzan Fath Zanjani (A 21), Mahmud Zaki (A 34), Majid Moshref (A 42), Roshan Bolbolian (A 43), Hossein Bahri (A 59), Mehdi Fereydooni (A 100), Jahanbakhsh Sarkhosh (C 8), Mohamed Ali Behkish (A 20) were executed, pages 1302 - 1697 of annex J1 to the minutes.*
15. Transcript and translation of an interview of witness Hossein Maleki, conducted by the Abdorrahman Boroumand Foundation in 2009, regarding *and in support of the mass executions of prisoners in Gohardasht and that Hamid Abbasi was working in Gohardasht, pages 111 - 279 of Additional Protocol 1.*

16. Amnesty International Annual Report for 1989 concerning and *in support of the mass executions of prisoners in Iran during the current criminal period and that there are serious deficiencies in the rule of law and that torture occurred in Iran*, pp. 21-26 Protocol Annex J2.
17. Amnesty International report "Iran: Violations of human rights 1987 - 1990", regarding and *in support of the mass executions of prisoners in Iran during the current criminal period, that the Iranian regime attempted to conceal the mass executions, that the executions constituted an illegitimate killing, the jurisdiction of the Revolutionary Courts in Iran 1987 - 1990 and the lack of due process in these courts and Iran's treatment of prisoners*, pages 36-93 of Protocol Annex J2.
18. Amnesty report "Blood - Soaked Secrets", concerning and *corroborating the mass executions of prisoners in Iran during the current criminal era and the background to them, that the executions constituted an unlawful killing, who were active in the Gohardasht killing committee, that many of the executed prisoners' bodies were buried in mass graves, that the Islamic regime acted for a long time to conceal the mass executions and its statements concerning the executions, that the plaintiff Asghar Mehdizadeh told about the mass executions in Gohardasht and that he was inside the execution room and saw prisoners being executed, that Adel Talebi (C 3), Mahmoud Behkish (C 21), Mohamed Ali Behkish (C 20), Mohsen Delijani (C 24), Bijan Bazargan (C 6), Gholam Reza Kiakojsori (A 50), Hosein Haji Mohsen (C 2), Mansour Hariri (A 67), Mohammadhasan Khaleghi (A 37), Hosseinali Khatibi (A 87), Jafar Tajaddod (A 40), Mahmoud Zaki (A 34), Behrooz Behnamzades (A 23), Hossein Bahri (A 59), Asadollah Tayebi (A 35), Ramin Ghasemi (A 11), Jafar Khosravi (A 80), Faramarz Delkash (A 24), Abbas Yeganeh (A 32), Hossein Niakan (A 45), Hamidreza Taherian (A 20), Mohammadreza Mohajeri (A 33), Karim Khoshafkar (A 88), Asghar Masjedi (A 15), Hadi Jalaloldin Farahani (A 66), Reza Azali (A 83), Heidar Sadeghi (A 89), Alireza Mehdizadeh (C 19), Faramarz Farahani (A 91), Ali Haghverdi (A 92), Hamid Ardestani (A 63), Iraj Jafarzadeh (A 65), Taher Haghghat Talab (A 38), Mohammadreza Shahir Eftekhari (A 27) Hadi Azizi (A 36), Roshan Bolbolian (A 43) executed*, pages 433 - 633 of Annex J1 to the minutes.
19. Amnesty report "Criminal cover up", regarding the Islamic regime's actions to cover up the mass graves where the bodies of prisoners executed during the current criminal period were placed, *in order to prove the mass executions and that the regime tried to conceal them*

executions and that suspected perpetrators of the mass executions were not prosecuted, pages 959 - 989 of Protocol Appendix J1.

20. Report of the Justice for Victims of 1988 Massacre in Iran (JVMI) - "Inquiry into the 1988 mass executions in Iran" published in 2017 regarding *and in support of the mass executions of prisoners in Iran including prisoners in Gohardasht during the current criminal period, which higher officials working in the Revolutionary Courts and in the Tehran Death Committee, that a person going by the name of Hamid Abbasi was an assistant to the deputy prosecutor in Gohardasht and that this person attended the executions, that the plaintiffs Mahmoud Royaie, Mohammed Zand, Akbar Samadi, Asghar Mehdizadeh, Hossein Farsy and the witness Hassan Ashrafian were interviewed, and that Reza Zand (A 13), Mohsen Seyyed Ahmadi (A 10) and Hossein Niakan (A 45) were executed, pages 335 to 401 of Additional Protocol 1.*
21. Article written by Payam Akhavan, "Is Grassroots Justice a Viable Alternative to Impunity The Case of the Iran People's Tribunal", regarding the background of the Iran Tribunal, the work and focus of the Tribunal, the Tribunal's verdict and its significance, and Iranian reactions after the verdict, *in support of the claim that mass executions of prisoners took place in Iran during the current criminal period and that executions constituted violations of international criminal law, pages 3-65 of Protocol Appendix J3.*
22. Article submitted by Payam Akhavan from the website Borhan exposing the criticism caused by the Iranian Tribunal in Iran, *in support of the mass executions of prisoners in Iran during the current criminal period, that there is a nexus between the executions and the attack of 26 July 1988 and that the Iranian regime saw prisoners sympathetic to the Mujahedin as the enemy, pages 67 - 72 of Protocol Annex J3.*
23. Translation of the fatwan into English, *in support of the mass executions of prisoners sympathetic to the Mujahedin in Iran during the current criminal period and the nexus between these executions and the armed conflict, page 257 of Protocol Annex J2.*
24. Operational analysis - literature review regarding the Iran-Iraq war and Iraqi support for and cooperation with the Mujahedin during the Iran-Iraq war *in support of the view that Iraq and the Mujahedin had extensive military cooperation during the end of the Iran-Iraq war and that the armed conflict was to be assessed as an international armed conflict between Iran and Iraq in which the Mujahedin were involved, pages 143 - 164 of the main protocol.*

25. Excerpt from the book "The Lessons of Modern War" Volume II Chapter 10 concerning the development of the Iran-Iraq war, *in support of the claim that at the time of the crime in question there was an international armed conflict between Iran and Iraq in which the Mujahedin was involved*, pages 167 - 187 of Protocol Annex J3.
26. Excerpts from Hossein Ali Montazeri's memoirs regarding and *in support of the mass executions of prisoners during the current criminal period, that the executions are related to the armed conflict and that the executions were not in accordance with Iranian law*, pages 302 - 319 of Additional Protocol 1.
27. Interviews with Hossein Ali Montazeri regarding and *in support of the mass executions of prisoners during the current criminal period and that the executions were not in accordance with Iranian law*, Protocol Annex Digital media U37-3.
28. Satellite image of Gohardasht Prison regarding and *in support of the appearance and location of the prison buildings*, page 188 of the main minutes and pages 203 - 209 of annex M1 to the minutes.
29. Sketches of Gohardasht submitted by Iraj Mesdaghi concerning and *in evidence of the appearance of the prison both externally and internally*, page 31
- 54 of Protocol Appendix F3.
30. Photographs of prisoners and staff, *to prove that Hamid Noury was the person who went by the name of Hamid Abbasi in Gohardasht prison*, pages 272 - 274 of Annex F1 to the minutes.
31. Mehdi Eshaghi's judgment regarding and *in support of his 10-year prison sentence in 1982*, pages 161 - 163 of Protocol Annex F2.
32. List of executed co-prisoners submitted by Ali Zolfaghari concerning and *in support of the fact that, inter alia, Amir Hossein Karimi (A 73), Farzin Nosrati (A 18), Masoud Khasto (A 79) and Mohsen Sadeghzadeh Ardabili (A 78) were executed in Gohardasht during the current criminal period*, page 351 of Annex F2 to the minutes.
33. List of prisoners executed during the Gohardasht mass executions compiled by Deljou Abadi (Iran Refugees Alliance) regarding and *in support of the execution of a very large proportion of the prisoners listed in Annex A*, file U72-4 Digital Material 2 of Additional Protocol 1.
34. Notes by Ramezan Fathi on executed fellow prisoners *to prove that, among others, Naser Mansouri (A 31), Kaveh Nasri (A*

- 48), *Farhad Atrak (A 60), Seyed Ali Vasli (A 94) and Ali Haghverdi (A 92) were executed during the Gohardasht mass executions, page 492 of Annex F2 to the minutes.*
35. Extracts from the "Black Book 67" concerning prisoners executed during the 1988 mass executions *to prove that Jahanbakhsh Sarkhosh (C 8), Mohsen Rajabzadeh (C 11), Abbas Raiisi (C 12), Jafar Rihai (C 13), Sadek Riahi (C 14), Mostafa Farhadi (C 16), Homoiyon Azadi (C 17), Madjid Walid (C 18), Behzad Omrani (C 19) and Hamid Nasiri (C 23) were executed in Gohardasht, Hosein Haji Mohsen (C 2), Adel Talebi (C 3), Heidar Nikoo (C 4), Majid Ivani (C 5), Bijan Bazargan (C 6), Mahmoud Alizadeh Azami (C 7), Kayvan Mostafavi (C 10), Mohammad Ali Pezhman (C 15), Mohamed Ali Behkish (C 20), Mahmoud Behkish (C 21), Ebrahim Najaran (C 22), Mohsen Delijani (C 24) and Sasan Ghandi (C 25) executed, pages 429 - 433 of additional protocol 1.*
36. *Replay of police interrogation of the late Hamid Nejati Khalaghdust regarding his experiences and observations in Gohardasht prison in 1988 - 1989 and the reason for his imprisonment in support of his conviction for sympathizing with the Mujahedin, that mass executions of prisoners in Gohardasht took place during the current criminal period, that Hamid Abbasi had a leading position in Gohardasht, and during the mass executions; that on 6, 9 and 13 August 1988 (15, 18 and 22 murdered in 1367) Hamid Abbasi was on the death row where Hamid Nejati Khalaghdust was, reading out the names of prisoners, including the names of the plaintiff, before they were brought before the death committee; that sometime on 6 August 1988 Hamid Abbasi was on the death row where Hamid Nejati Khalaghdust was, 9 and/or 13 August 1988 (15, 18 and/or 22 murdered in 1367) in the death row where the plaintiff was, read out the names of persons to be executed, including Dariush Hanifehpour (A 44), Hadi Saberi (A 51), Iraj Lashgari (A 74), Mahmud Meimanat (A 6), Ali Haghverdi (A 92), Hossein Niakan (A 45), Rahman Cheraghi (A 99) and Gholam Reza Kiakojsori (A 50) and brought them to execution and that Dariush Hanifehpour (A 44), Hadi Saberi (A 51), Iraj Lashgari (A 74), Mahmud Meimanat (A 6), Ali Haghverdi (A 92), Hossein Niakan (A 45), Rahman Cheraghi (A 99) and Gholam Reza Kiakojsori (A 50) were subsequently executed, and that Hamid Nejati Khalaghdust was subjected to severe suffering. (Counsel for the plaintiff, Bengt Hesselberg)*
37. Book cover and translation of Iraj Mesdaghi's book "Neither Life Nor Death, vol. 3 Restless Raspberries", concerning and *in support of the events and conditions in Gohardasht in 1988, that*

mass executions of prisoners in Gohardasht took place during the current criminal period, that Iraj Mesdaghi was brought to the death committee on several occasions, that several of the persons listed in Annex A were executed, and as evidence of who were members of the death committee in Gohardasht, that Hamid Noury was involved and played a leading role in the mass executions of prisoners in Gohardasht during the current criminal period and that this book was written in 2004 and published in 2006 pp. 57-58 of Protocol Annex F3, 20-141 of Additional Protocol 2, 4-122 of Additional Protocol 3, pages 9 - 13 of Additional Protocol 4.

38. Book cover and excerpts from Iraj Mesdaghi's book "To ...The Dawn of Grapes" regarding and *in support of the mass executions of prisoners in Gohardasht during the current criminal period*, pages 60 - 61 of Protocol Annex F3, 266 - 328 of Additional Protocol 3, 12 of Additional Protocol 4.
39. "The Massacre" authored by Iraj Mesdaghi, regarding and *in support of events and conditions in Gohardasht in 1988, that mass executions of prisoners in Gohardasht occurred during the current criminal period, that Hamid Noury was involved in the executions, and that many of those listed in Appendix A were executed*, pages 43 - 101 of the main record.
40. Translation of Iraj Mesdaghi's book "The Dance of the Firebirds and the Ashes" published in 2011, concerning and *in support of the events and conditions in Gohardasht in 1988, that mass executions of prisoners in Gohardasht took place during the current criminal period, that Hamid Noury was involved in the executions and that many of those listed in Annex A were executed*, pages 143 - 222 of Additional Protocol 2, 198 - 264 of Additional Protocol 3.
41. Excerpts from Mahmoud Royaie's book "Aftabkaran", regarding and *in evidence of the mass executions of the prisoners in Gohardasht, that several of the prisoners in Annex A were executed and that Hamid Noury was involved in the executions*, pages 233 - 246 of Protocol Annex J3.
42. Excerpts from Hossein Farsy's book "A Galaxy of Stars" published in 2016 (2nd edition), regarding and *in evidence of the mass executions of prisoners in Gohardasht during the current criminal period, that Hamid Noury was involved in the executions, and that Mahmoud Meimanat (A 6), Dariush Hanifepour (A 44) and Hossein Niakan (A 45) were executed, among others*, pages 435 - 537 of Additional Protocol 3.
43. Excerpts from Mehdi Asli's book "The Last Chance of the Flower", *to prove that Hosein Haji Mohsen (C 2), Mahmoud Alizadeh Azami (C 7), Jafar Riahi (C 13), Sadek Riahi (C 14) were executed during the*

current criminal period in

Gohardasht and that Bijan Bazargan (C 6), Hamid Nasiri (C 23) were also executed during the current criminal period, pages 290 - 301 of Additional Protocol 1.

44. Letter from Adel Rouzdar (C 1) and photographs submitted by his sister, Sara Rouzdar, *to prove that Adel Rouzdar was imprisoned in Gohardasht and that he was executed during the mass executions of the current criminal period, pages 239 - 240, 242 - 244, 257 - 263 of Protocol Appendix F3.*
45. Documents submitted by Sedigheh Haji Mohsen concerning Hossein Haji Mohsen (C 2) consisting of birth certificate, death certificate, education certificate, employment certificate and three letters, *proving that Hossein Haji Mohsen was executed, pages 265 - 276 of Protocol Annex F3.*
46. Photographs submitted by Esmat Talebi Kalhoran showing her brother Adel Talebi's (C 3) bag and other belongings obtained from the authorities after the executions and death certificate and translations of these documents, as *evidence of Adel Talebi's execution, pages 287-288, 290, 305-306 of Protocol Annex F3.*
47. Documents submitted by Majid Atabaki concerning executed fellow prisoners and a translation thereof, concerning and *in support of the execution of Roshan Bolbolian (A 43) and Hossein Niakan (A 45), page 498, Protocol Annex F3, 87 - 88 of Additional Protocol 1.*
48. Documents submitted by Mokhtar Borojerdy Shalavand, depicting a photograph of his brother Hamzeh Borojerdy Shalavand's (A 5) bag, which was returned to them by the Iranian authorities after his brother was executed, the brother's ID document, photograph of the brother and excerpts from Mehdi Asli's book, as *evidence that Hamzeh Borojerdy Shalavand was executed in Gohardasht during the relevant criminal period, pages 10 to 19 of Additional Protocol G2, 109 to 119 of Additional Protocol 1.*
49. Document submitted by Nasrullah Marandi, showing a conviction, as *evidence that Nasrullah Marandi was sentenced to 15 years' imprisonment, pages 54 - 56 of Annex F4 to the minutes.*
50. Video showing a lecture given by Nasrullah Marandi in Stockholm in August 2018, *to prove that Nasrullah Marandi names Hamid Abbasi/Hamid Noury as being involved in the mass executions of prisoners in Gohardasht, Digital material Z119.*

51. Video showing a lecture given by Ahmad Ebrahimi regarding and *in support of mass executions of prisoners in Gohardasht in 1988 and that Ahmad Ebrahimi was brought to the death committee during the current crime period in Gohardasht, Digital material U72-9.*
52. Video showing a lecture given by Mahmoud Royaie, broadcast on a television channel more than 20 years ago, regarding and *in support of the mass executions of prisoners in Gohardasht during the current criminal era and the involvement of Hamid Noury in the executions, Digital material G178-1.*
53. List of executed persons submitted by Hossein Farsy and named in his book *A Galaxy of Stars*, as *evidence that, among others, Iraj Lashgari (A 74), Akbar Shakeri (A 30) and Reza Abbasi (A 3) were executed*, pages 156 - 157 of Annex F4 to the minutes
54. Documents, submitted by Amir Atiabi Houshang, showing picture of his almanac in which he noted the days bodies were loaded onto truck beds as well as a drawing of parts of Gohardasht, *in evidence of the mass executions of prisoners in Gohardasht during the current crime period, where the prisoners were located when they heard the death commission discuss the executions and where the bodies were transferred to trucks*, pages 64 - 67, 123 - 124 of Protocol Appendix G3.
55. Interview with Amir Atiabi held by Iran Human Rights in 2009, *in support of the mass executions of prisoners in Gohardasht and the execution of Mahmoud Behkish (C 21) and Mohamed Ali Behkish (C 20)*, pages 89 - 108 of Additional Protocol 1.
56. Video interview by Justice for Iran with Hassan Golzari *to prove that Hossan Golzari was taken to the death committee in Gohardasht during the current crime period and that Hamid Noury was in Gohardasht during this time, Digital material U163-2.*
57. Received emails from Mehrzad Dashtbani regarding executed fellow detainees, *confirming that Mohammad Ali Pezhman (C 15), Abbas Raiisi (C 12), Bijan Bazargan (C 6), Mohamed Ali Behkish (C 20), Mohsen Rajabzadeh (C 11), among others, were executed, Hosein Haji Mohsen (C 2), Mahmoud Behkish (C 21), Anusheh Taheri (C 26), Kayvan Mostafavi (C 10), Mohsen Delijani (C 24), Adel Rouzdar (C 1), Sasan Ghandi (C 25) were executed in Gohardasht during the current criminal period*, pages 221 - 222 of minutes appendix G3.

58. Document submitted by Payvand Manouchehr, showing a copy of a judgment, *in support of Payvand Manouchehr's sentence of 10 years' imprisonment*, pages 838 - 840 of Annex G2 to the minutes.
59. Documents, including letters, submitted by Solmaz Alizadeh regarding and *in support of the execution of Mahmoud Alizadeh Azami in Gohardasht during the 1988 mass executions*, pages 64- 86 in additional protocol 1.
60. Photograph of Gohardasht page 153 of protocol appendix M1.
61. Memorandum concerning photographs found in Hamid Noury's mobile phone showing and *proving that Hamid Noury served in the military and that his brother was killed in the Iran-Iraq war*, pages 2 - 41 of minutes annex R1.
62. Memorandum concerning contact details found in Hamid Noury's mobile phone identifying and *proving that Hamid Noury has contact details of persons linked to Evin and Gohardasht as well as several contacts within the Iranian judiciary*, pages 44 - 52 of Annex R1 to the minutes.
63. Memorandum concerning text messages found in Hamid Noury's mobile phone indicating and *proving that Hamid Noury has a good knowledge of legal matters, that Hamid Noury has good contacts in the Iranian judiciary and that he calls himself Hamid Abbasi*, pages 59 - 111 of the minutes appendix R1.
64. Memorandum regarding images of documents and screenshots found in Hamid Noury's mobile phone demonstrating and *proving that Hamid Noury has a good knowledge of and interest in legal matters*, pages 113 - 133 of minute annex R1.
65. Memorandum regarding Whatsapp chats found in Hamid Noury's mobile phone showing and *proving that Hamid Noury has good knowledge of legal matters, that Hamid Noury has good contacts in the judiciary and that Hamid Noury is called Abbasi*, pages 135 - 155 of minutes appendix R1