

A MIDDLE EAST FORUM REPORT

Blood Money

Crimes against Humanity in Iran, and the Enablers Who Profit from the Repression

The Evidentiary and Legal Predicate for Accountability, Sanctions, and Divestment

Scope: December 28, 2025 to October 4, 2026

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Methodology and Evidentiary Note

Purpose. This report sets out the factual and legal predicate for accountability, targeted sanctions, and divestment directed at the Government of the Islamic Republic of Iran, the Islamic Revolutionary Guard Corps (IRGC), and the institutions and individuals responsible for the mass killings, mass detention, torture, enforced disappearances, and executions that accompanied the suppression of the nationwide uprising that began on December 28, 2025. It is written for governments, parliaments outside the United States, universities, pension funds, asset managers, and accountability bodies. This edition, dated October 4, 2026, updates the July 19, 2026 text: it records the deaths of senior officials named in earlier editions, rebuilds the accountability sections around the officials now in post, and adds Section XI, which covers the record from 19 July to October 4, 2026.

Source tiering. Claims are drawn, in descending order of evidentiary weight, from: (1) United Nations bodies, the High Commissioner for Human Rights, the Special Rapporteur on Iran, and the Independent International Fact-Finding Mission on Iran; (2) established human-rights organisations with documented verification methodologies, the Human Rights Activists News Agency (HRANA), Amnesty International, Human Rights Watch (HRW), the Center for Human Rights in Iran (CHRI), Iran Human Rights (IHRNGO), and the Hengaw Organisation for Human Rights; (3) government records, including the official filings of the United States Treasury, the European Council, the UK FCDO, and Global Affairs Canada; and (4) reputable news organisations and diaspora-focused outlets. Where a claim rests on a single outlet or on opposition-linked reporting, this is stated expressly.

The blackout and the “minimum verifiable” standard. From January 8, 2026 the Iranian authorities imposed a near-total internet and telephone blackout¹ that suppressed the flow of evidence and is itself documented as a deliberate instrument of concealment. As a result, every casualty figure in this report is a minimum. HRANA, the most conservative of the major monitors, expressly documents “minimum verifiable cases rather than ... maximal estimates.”² The wide divergence between confirmed counts and higher estimates is therefore presented transparently in Section IV rather than resolved into a single number.

Critical scope boundary, the uprising versus the war. Beginning February 28, 2026, a separate armed conflict, a US-Israel-Iran war, erupted, with a ceasefire in early April 2026; hostilities between the United States and Iran resumed around 30 to August 31, 2026 (Section XI).³⁴ The very large displacement and casualty figures associated with that war, for example UNHCR’s estimate of up to 3.2 million temporarily displaced³ and Hengaw’s war-casualty series, are not attributable to the protest crackdown and are kept separate from the crackdown statistics throughout this report. Conflating the two would be the single most serious analytical error available, and this document is structured to prevent it.

What this report does not claim. Certain widely circulated allegations, most notably the reported deployment of foreign Shia militias to help suppress the protests, remain unverified by independent monitors and are flagged as such (Section V.G). The report does not rely on any single sensational figure; it builds its legal conclusions on the conduct that is corroborated across multiple independent sources.

Online records. The data behind this report are published on the Iran Ledger: the Sanctions Monitor at <https://iran.meforum.org/designations> (designation status), the evidence tables at <https://iran.meforum.org/blood-money/evidence/> (casualty and detention figures by source and date), the Blood Money List at <https://iran.meforum.org/blood-money/list/> (designated targets), and the source register at <https://iran.meforum.org/sources>. Only officially designated entities are named as targets.

I. Executive Summary

Between December 28, 2025 and February 2026, the Islamic Republic of Iran confronted the largest popular uprising since the 1979 revolution and answered it with what United Nations officials, independent human-rights organisations, and a former international war-crimes prosecutor have characterised as the deadliest crackdown in the country's modern history, and, in the words of that prosecutor, an act of extermination.⁶

The uprising began as a bazaar strike in Tehran over the collapse of the rial and soaring inflation and spread within days into an anti-regime movement across all 31 provinces and more than 200 cities. After then-Supreme Leader Ali Khamenei publicly branded protesters "rioters" to be "put in their place" on January 3, 2026, and the Judiciary chief ordered "no leniency" on January 5, 2026, the state escalated to live fire. On January 8, 2026 the authorities cut the internet and telephone network nationwide; under that cover, on 8 and January 9, 2026, security forces carried out mass shootings of protesters and bystanders. Ali Khamenei was killed on February 28, 2026, the first day of the war; his son Mojtaba Khamenei was named Supreme Leader on March 8, 2026, confirmed March 9.⁷

Core findings:

^AMass killing. Confirmed deaths range from the Iranian government's official figure of 3,038 (settled in early February; its earlier 21 January figure, reported by France24, was 3,117) to HRANA's verified count of 7,007 (with 11,744 further cases under review) as of late February 2026; the UN Special Rapporteur, Mai Sato, said at least 5,000 had been killed (January 20, 2026) and later that more than 20,000 may have been killed (February 21, 2026), and several investigations based on hospital records and leaked official documents place the 8-9 January toll alone at 30,000-36,500. Children were killed and counted separately (HRANA: 236).

^AMass detention. HRANA documented 53,777 arrests over 50 days; civil-society aggregates place detentions above 50,000, including hundreds of children, with thousands subjected to enforced disappearance, incommunicado detention, and broadcast forced "confessions."

^AExecutions and death sentences. Detained protesters were charged with moharebeh ("enmity against God") in summary proceedings; in the first widely reported case, rights groups said a detainee was sentenced to death within days of arrest, a claim the judiciary disputed. Reports that more than 800 protesters were sentenced to death trace to US presidential statements and were disputed by Iran's prosecutor; Iran Human Rights documented at least 100 protesters sentenced to death as of September 16, 2026;⁸ and Hengaw documented secret executions continuing into spring 2026, atop a 2025 baseline of at least 1,500 executions, the most in decades.

^AMethods amounting to crimes against humanity. Military-grade weapons and live ammunition against unarmed civilians; rooftop sniping; shotgun pellets fired into faces and eyes; armed raids on hospitals to seize

the wounded and the dead; the targeting of doctors, lawyers, and journalists; torture and sexual violence in detention; coercion of bereaved families; and the weaponised internet blackout to conceal it all.

^AIdentifiable responsibility. The chain ran from the late Ali Khamenei and the Supreme National Security Council (which reportedly ordered live fire) through the IRGC, the Basij, FARAJA, the Ministry of Intelligence, and the Revolutionary Courts, down to named provincial commanders and judges. Several of the men at the top have since been killed in the war. Others remain in post, and the chain of command now runs through Supreme Leader Mojtaba Khamenei, Supreme National Security Council secretary Mohsen Rezaei, and IRGC commander-in-chief Ahmad Vahidi (Section VII).

^ASince July. From 19 July to October 4, 2026: the war resumed; Iran Human Rights published a list of 4,219 named dead; at least 31 people had been executed in connection with the January protests as of September 30, 2026; more than 40 states condemned Iran's use of the death penalty at the Human Rights Council on September 30, 2026; and on October 3, 2026 the authorities demolished one of the last watchtowers at Gohardasht (Rajaei Shahr) prison, a site of the 1988 mass executions (Section XI).

^AThe predicate. These acts satisfy the elements of crimes against humanity under Article 7 of the Rome Statute (murder, extermination, imprisonment, torture, enforced disappearance, and persecution committed as part of a widespread and systematic attack pursuant to state policy). The UN Independent International Fact-Finding Mission on Iran reached the same conclusion in its September 2026 report to the Human Rights Council, finding that many of Iran's violations "amount to the crimes against humanity of murder, imprisonment..., torture, and other inhumane acts."⁹ The record supplies defensible grounds for expanded, targeted sanctions and divestment (Section X).

II. Background and Triggers

The uprising did not arise in a vacuum. It followed the June 2025 "Twelve-Day War," in which the United States struck Iranian nuclear facilities, and the September 2025 reimposition of UN sanctions through the "snapback" mechanism triggered by the United Kingdom, France, and Germany.¹⁰ These shocks compounded years of mismanagement. Iran's statistics centre reported annual inflation of about 42% in December 2025, with food prices up roughly 72% and medical goods about 50% year-on-year; the rial collapsed to successive record lows of around 1.4-1.5 million to the US dollar in late December 2025, prompting the resignation of the Central Bank governor.¹¹

The trigger event was a strike by shopkeepers in Tehran's Grand Bazaar on December 28, 2025, the same merchant class whose mobilisation helped topple the monarchy in 1979; contemporaneous reporting captured anti-government chanting in Tehran, Isfahan, Shiraz, and Mashhad as the rial hit record lows.¹²

Within days the economic protest became an explicitly political uprising. Demonstrations spread to all 31 provinces and, by various counts, 200-210 cities and 675-682 distinct locations, with protesters chanting against the Supreme Leader and for the end of the Islamic Republic; opposition figure Reza Pahlavi's 8 January call for unified protest is widely cited as an inflection point.¹³ This report concerns the state's response to that movement.

A pre-existing wave of labour and civic unrest. The uprising crystallised grievances that had been building for months: recurring labour and pensioner protests, and the regime’s failure to provide basic services. In 2025 Iranians faced severe water shortages and electricity cuts that forced school and business closures, which the authorities blamed on “drought and overconsumption” rather than systemic failure. Layered on the strategic and currency shocks of late 2025, these conditions primed a broad cross-section of society to mobilise.¹⁴

Ethnic and regional dimension. Amnesty notes the regime’s chronic under-investment in regions home to ethnic minorities such as Kurds and Baluchis, deepening marginalisation; the crackdown fell with particular weight on Kurdish areas, and Kurdish-focused monitors (Hengaw; the Kurdistan Human Rights Network) documented disproportionate killings there, a pattern relevant to the persecution analysis in Section IX.¹⁵

III. Chronology of the Uprising and Crackdown

The following timeline is cross-referenced across UN bodies, HRANA, Amnesty International, Human Rights Watch, the Center for Human Rights in Iran, the UK Home Office, and major news organisations. It distinguishes Phase I (the main uprising and massacre, December 28, 2025 to c. January 16, 2026) from Phase II (the renewed, university-led protests from February 21, 2026) and from the separate war that began February 28, 2026.

Phase I: Uprising and Massacre (December 28, 2025 to January 16, 2026)

Date	Event
28 Dec 2025	Shopkeepers strike in Tehran’s Grand Bazaar over the rial’s collapse; protests begin.
29–31 Dec	Protests spread across more than a dozen provinces; first reports of live fire in smaller towns. President Pezeshkian initially calls for “dialogue.”
3 Jan 2026	Supreme Leader Ali Khamenei (killed 28 Feb 2026) calls protesters “rioters” who must be “put in their place.” IRGC kills at least four, including a child, in Malekshahi, Ilam; security forces raid Khomeini Hospital, Ilam.
5 Jan	Judiciary Chief Mohseni Ejei orders prosecutors to act “without leniency,” links protesters to Israel and the US.
6 Jan	Rial hits record low; CHRI documents 27+ civilians killed (incl. six children) since 28 Dec; HRANA reports 34 killed and 2,000+ arrested. Tear gas fired inside Sina Hospital, Hasanabad (Tehran).
8 Jan	Peak of the uprising (est. 1.5 million in Tehran). Near-total internet and telephone blackout imposed. Mass shootings begin. At least 217 reported killed in Tehran alone.
8–9 Jan	The massacres: security forces fire on protesters and bystanders nationwide under cover of the blackout. Death toll rises into the thousands.
10–13 Jan	Footage emerges of overflowing morgues, the Kahrizak forensic centre and Behesht-e Zahra cemetery near Tehran. Phone calls partially resume from 13 Jan, revealing the scale.
13–14 Jan	First widely reported capital case: rights groups say Erfan Soltani (26) was sentenced to death for moharebeh (execution set 14 Jan). The judiciary disputed the sentence and he was reportedly later released, see §IV.E.
16 Jan	Protests largely suppressed; HRW publishes “Growing Evidence of Countrywide Massacres.”
20 Jan	UN Special Rapporteur Mai Sato says at least 5,000 people have been killed. ¹⁶

Aftermath, Admissions, and International Response (January 17 to February 2026)

Date	Event
17 Jan	Khamenei publicly acknowledges “thousands” were killed; blames the US.
21 Jan	Iran’s Supreme Council of National Security /state TV issues first official toll: 3,117 killed (France24; the government later settled on 3,038, per the UN Fact-Finding Mission) (labelling most “terrorists”).
23 Jan	UN Human Rights Council holds its 39th Special Session; adopts resolution (25-7-14) tasking the Fact-Finding Mission with an urgent investigation and extending its mandate two years.
25 Jan	Iran International and Time, citing hospital records and leaked official documents, report ~30,000-36,500 killed on 8-9 January.
1 Feb	Office of the President publishes an official victims list that monitors and journalists assess as largely unverifiable.
9 Feb	Authorities arrest prominent reformist politicians, citing alleged links to the US and Israel.
21-25 Feb	Phase II: renewed, university-led protests at the start of the new semester; 40-day memorials for the dead; Basij and security forces attack campuses.
21 Feb	UN Special Rapporteur Mai Sato says more than 20,000 people may have been killed. ¹⁶
23 Feb	HRANA publishes “The Crimson Winter,” with a named list of 7,007 confirmed dead and 11,744 cases under review.
28 Feb	A separate US-Israel-Iran war begins (out of scope for the crackdown statistics; see Methodology). Ali Khamenei and IRGC commander-in-chief Mohammad Pakpour are killed. Internet is cut again.

Note on the post-February period. Repression continued through spring and summer 2026, including secret executions of protest detainees documented by Hengaw in April and May 2026 and an intensifying assault on defence lawyers, even as the war dominated headlines.¹⁷ Those continuing protest-related abuses are within scope; the war’s own casualties are not. Developments from 19 July to October 4, 2026 are set out in Section XII.

IV. Statistical Review

This section presents the numbers transparently, by source and date, rather than collapsing them into a single figure the regime could dispute. The divergence is itself evidence: it is the predictable consequence of a deliberate communications blackout imposed to prevent an accurate count.

IV.A Death Toll

Estimates of those killed span an order of magnitude, from the Iranian government’s official figure of 3,038 to investigations placing the 8-9 January toll alone above 36,000. The table below catalogues the principal figures.¹⁸ Each is a minimum given the conditions of documentation.

Source	Date	Death figure	Basis / notes
Iranian government (Supreme Council of National Security /state TV)	Feb 2026 (earlier figure 21 Jan)	3,038	Official figure per the UN Fact-Finding Mission (A/HRC/63/61); the earlier 21 Jan figure was 3,117 (France24); ~2,427 said to be civilians+security,

Source	Date	Death figure	Basis / notes
			remainder labelled “terrorists.” List of 2,986 names later published; HRANA found it mostly unverifiable.
Iran Human Rights (IHRNGO)	14 Jan 2026	3,428 verified	Majority killed 8-12 Jan; IHRNGO notes govt historically reports ~12% of true totals.
HRANA	20 Jan 2026	4,519 verified (+9,049 under review)	Includes 197 security personnel.
HRANA	28 Jan 2026	6,221 confirmed (5,858 protesters) (+17,091 under review)	11,000+ severely injured; 42,324 arrests.
HRANA: “The Crimson Winter”	23 Feb 2026	7,007 confirmed (+11,744 under review)	6,488 protesters; 236 children (counted separately); 76 non-protester civilians; 207 security. Named list; minimum-verifiable standard.
Hengaw	~14 Jan 2026 (17 days in)	? 3,000 civilians (incl. 44 children)	20,000+ detained; shoot-to-kill to vital organs; hospital raids.
UN Special Rapporteur on Iran (Mai Sato)	16–22 Jan 2026	? 5,000; possibly >20,000	Higher figure from medical sources; “could not be verified due to the internet shutdown.”
UN High Commissioner (Volker Türk)	23 Jan 2026	“thousands,” incl. children	Live ammunition; raids into hospitals; ~100 forced confessions broadcast.
UN Fact-Finding Mission (Sara Hossain, Chair)	23 Jan 2026	“a staggering number”	Assault rifles and heavy machine guns; ~24,000 detained; deadliest since 1979.
Iran International	10–13 Jan 2026	~2,000 (48h) q ~12,000	12,000 figure cited high-level government/security sources.
Iran International (editorial board)	25 Jan–3 Feb 2026	~36,500 (8–9 Jan); own named list of 6,634	Based on classified documents, field reports, medical staff, families.
Leaked Iranian official reports (via Iran International)	20–24 Jan 2026	27,500–36,500	Interior Ministry >30,000 (20 Jan); Parliament committee 27,500; IRGC Intelligence Org 33,000 (22 Jan), 36,500 (24 Jan).
Time	12–25 Jan 2026	up to 6,000 q ~30,000 (8–9 Jan)	25 Jan: surgeon Amir Parasta cited 30,304 deaths from hospital records.
The Sunday Times	17–24 Jan 2026	16,500–18,000 q 25,654 “clinically verified”	Database from ~24 hospitals; 330,000 injured.
CBS News	13 Jan 2026	12,000–20,000	Sources including one inside Iran; verified morgue video (2 366 bodies).
The Guardian	27 Jan 2026	could exceed 30,000	Network of 80+ medics across 12 provinces; <10% of deaths officially registered.
Reza Pahlavi (via The Sunday Times)	24 Jan 2026	~50,000 (incl. ~15,000 in Tehran)	Citing activists, political prisoners, medical authorities.

Single-site morgue evidence. At the Kahrizak forensic centre south of Tehran, Amnesty International reported on 14 January that it had identified at least 205 distinct body bags in five verified videos; Human Rights Watch counted at least 400 bodies across three videos and called that an undercount.¹⁹ A witness who went to the nearby Behesht-e Zahra cemetery on 10 January estimated 1,500–2,000 bodies held in its halls, with more arriving by refrigerated truck.²⁰ The UN Fact-Finding Mission described the Kahrizak images of “hundreds of body bags piled on top of one another” as “haunting.”²¹

The official undercount. Iran Human Rights warned that Iranian government sources have “a documented and long-standing record of systematically underreporting deadly state violence,” noting that over the preceding five years official figures captured “an annual average of 12% of the executions recorded by IHRNGO.”²² The government’s own official victims list was assessed as largely unverifiable: Iran International reported that the official list and its independently compiled list of 6,634 named dead had fewer than 100 names in common.²³

IV.B Children and Demographic Composition

Children were among both the dead and the detained. HRANA’s 50-day report counted 236 children killed, recorded separately from the 6,488 protesters, precisely to prevent analytical conflation.²⁴ The Center for Human Rights in Iran documented at least six children killed by gunfire in the first nine days alone, and reported that hundreds of children under 17 were arbitrarily and violently arrested in cities including Harsin (Kermanshah) and across Kohgiluyeh and Boyer-Ahmad, with many forcibly disappeared into juvenile detention.²⁵ Amnesty International documented the arrest of children as young as 14, and the movement’s social composition was broad: men and women across diverse ethnic and religious groups, with heavy participation by university students (HRANA documented 55 university protests at 36 universities) and labour and professional unions.²⁶

IV.C Injuries

HRANA documented 25,846 injured civilians (alongside 4,884 injured security personnel) over the first 50 days.²⁷ The Sunday Times’ hospital database put total injuries as high as 330,000.²⁸ A signature injury pattern was the deliberate firing of metal shotgun pellets into faces and eyes: the Fact-Finding Mission reported that roughly 500 protesters with eye injuries from pellets appeared at a single Isfahan hospital on 10 January, recalling the documented blinding of protesters during the 2022 Woman, Life, Freedom uprising.²⁹

IV.D Detentions, Enforced Disappearances, and Forced Confessions

HRANA documented a rising arrest count, from over 2,000 in the first nine days to 42,324 by 28 January and 53,777 over the first 50 days, including 555 children and school students and 147 university students.³⁰ HRANA’s 53,777 confirms detentions above 50,000, the figure adopted in this project’s framing, while the Fact-Finding Mission estimated around 24,000 detained as early as mid-January.³¹

Beyond the raw count, three features make the detention campaign a distinct category of abuse. First, enforced disappearance and incommunicado detention: the Special Rapporteur reported “tens of thousands ... detained nationwide without legal counsel or family contact,” and Amnesty documented detainees “subjected to enforced disappearance ... putting them at serious risk of torture and other ill-treatment,” including sexual violence.³² Second, forced confessions: the High Commissioner reported nearly 100 forced confessions broadcast on state media; HRANA documented 369 over 50 days, including teenagers coerced into confessing to being “protest leaders.”³³ Third, summonses as parallel pressure: HRANA documented 11,053 summonses to security institutions, extending coercion well beyond those formally arrested.³⁴

IV.E Executions and Death Sentences

The judiciary moved to convert the crackdown into a wave of capital punishment. Detainees were charged with moharebeh (“enmity against God”) and efsad-e fel-arz (“corruption on earth”), national-security offences carrying the death penalty, in proceedings that human-rights groups describe as summary and reliant on torture-extracted confessions.³⁵

The first widely reported case illustrated both the speed of the machinery and the regime’s information games: rights groups (Iran Human Rights and Hengaw) reported that Erfan Soltani, a 26-year-old arrested at home on 8 January in Fardis/Karaj and denied a lawyer, had been sentenced to death within roughly two days for moharebeh and scheduled for execution on 14 January. Iran’s judiciary disputed that a death sentence had been imposed (asserting lesser charges), the execution was postponed, and Soltani was reportedly released on bail at the end of January, a sequence that itself illustrates both the speed of capital trials and the difficulty of verification under the blackout.³⁶ HRANA recorded at least 52 executions during the protests between 5 and 14 January.³⁷ Reporting indicated that more than 800 protesters were sentenced to death, with executions reportedly paused after US threats of intervention, a pause whose durability was uncertain.³⁸

Repression by execution continued into the spring. Iran International reported a court issuing death sentences to 14 detainees in online proceedings on 16 February; Hengaw reported that at least 30 January-protest detainees had been sentenced to death and 13 secretly executed by early May; and on June 1, 2026 two January protesters, Mehrdad Mohammadinia and Ashkan Maleki, were secretly executed, convicted of mosque-and-seminary arson under Iran’s newly enacted espionage law, and among at least 17 protesters executed in connection with the uprising since March 19, 2026.³⁹ By mid-July 2026 the pace had quickened, and on July 15, 2026 the judiciary announced it had hanged Mohammad Amini Dehaghani for moharebeh and efsad-e fel-arz over the 9 January arson of a governor’s office in Dehaghan, Isfahan, with Amnesty International warning that the regime was exploiting “wartime conditions” as a pretext to accelerate politically motivated executions.⁴⁰ By September 30, 2026 Iran Human Rights counted at least 31 people executed in connection with the January protests since March 18, 2026 (Section XI.D).⁴¹ These protest-related executions sat atop an extraordinary baseline: the UN High Commissioner reported that at least 1,500 people were executed in Iran in 2025, roughly a 50% increase on the prior year and the most in decades.⁴²

IV.F Displacement (Scope-Critical Distinction)

The crackdown itself produced no published outflow count. The honest finding, which protects the credibility of this dossier, is that for the protest-crackdown window (December 28, 2025 to February 2026) no UN agency or government produced an aggregate figure for Iranians who fled. Border reporting was anecdotal: a “limited in scale” trickle of wounded protesters reaching Turkey (Van/Kapıköy) and a “trickle” into Iraqi Kurdistan.⁴³ The likeliest explanation is the 8 January blackout and exit restrictions, which suppressed both movement and its measurement.

The large displacement figures belong to the war, not the crackdown. The headline numbers that circulate: UNHCR’s estimate of up to 3.2 million temporarily displaced, and over 531,000 cross-border movements (with ~450,000 returning), measure the US-Israel-Iran war that began February 28, 2026, and UNHCR explicitly characterised most border movement as routine or precautionary rather than refugee flight.⁴⁴ To attribute them to the crackdown would be a serious error; this report does not.

Targeted flight of dissidents, and the baseline. What is documented for the crackdown is the targeted flight and transnational persecution of specific groups: RSF recorded at least 24 journalists detained during the blackout, and Tehran ordered the seizure of assets of more than 100 Iranians abroad, including dozens of Iran International and Manoto staff.⁴⁵ For context, before the uprising UNHCR recorded roughly 158,000 Iranian refugees and 61,000 asylum-seekers abroad at end-2024 (about 219,000 combined), concentrated in Germany and the UK. Notably, EU and UK data showed no measurable asylum surge through spring 2026, partly because several states simultaneously erected entry barriers, so the absence of a refugee wave should not be mistaken for an absence of persecution.⁴⁶

IV.G Comparative and Historical Scale

The 2025-2026 toll dwarfs every previous episode of protest repression in the Islamic Republic’s history. The table situates it against earlier events; even the regime’s own official figure of 3,038 exceeds the combined acknowledged tolls of the 2009, 2019, and 2022 crackdowns, and the verified and estimated figures are far higher.⁴⁷

Event	Year	Reported deaths
Post-revolution executions	1981-1982	3,500+
Prison massacre of political prisoners	1988	1,000-33,000 (commonly est. ~5,000)
Green Movement protests	2009	~72
“Bloody Aban” protests	2019-2020	300-1,500 (Amnesty: ? 304)
Woman, Life, Freedom uprising	2022-2023	551+
The 2025-2026 uprising	2025-2026	3,038 (official) to 7,007 confirmed (HRANA) to up to ~36,500 (estimates)

The comparison that recurs in expert testimony is to mass-atrocity events, not to ordinary protest policing. Professor Payam Akhavan told the Human Rights Council that the killing was roughly twice the Srebrenica toll (≈8,000) in half the time, and Iran International’s analysis compared the alleged 8-9 January toll to the deadliest two-day episodes of state violence on record.⁴⁸

IV.H Named Capital Cases

The following individual cases illustrate the summary, fast-tracked machinery of capital punishment applied to protesters. They are a sample, not an exhaustive list. Entries flagged “reported/contested” rest on rights-group reporting that the authorities disputed; they are included for completeness and should be cited with that qualification.

Case	Detail	Source
Erfan Soltani (26) (reported/contested)	Arrested 8 Jan (Fardis/Karaj); rights groups reported a death sentence within ~2 days (moharebeh) and execution set 14 Jan. Judiciary disputed the sentence; reportedly released on bail, not executed.	IHR; Hengaw; BBC; RFE/RL
Mohammad Abbasi (reported)	Reported executed (per IHRNGO), which warned of continuing political-prisoner executions. Reported, not independently confirmed by the major monitors.	Iran Human Rights (iranhr.net)
Mohammad Amini Dehaghani	Hanged 15 Jul 2026 for moharebeh/efsad-e fel-arz over the 9 Jan arson of a governor’s office (Dehaghan, Isfahan). Amnesty: regime using “wartime conditions” as an execution pretext.	Euronews (Mizan); Amnesty

Case	Detail	Source
Executions mounting (2026)	IHRNGO: at least 31 executions linked to the January protests since 18 Mar 2026 (as of 30 Sep 2026); at least 532 executions of all kinds in January to August 2026.	Iran Human Rights
Majid Nikandish (25) and Ali Hemmati-Sistani	Executed at dawn on 30 Sep 2026 in Mashhad over the January protests.	Hengaw; Iran Human Rights
14 detainees	Sentenced to death in online court proceedings, 16 Feb 2026.	Iran International
30+ January detainees	At least 30 protest detainees sentenced to death; 13 secretly executed by early May.	Hengaw, May 4, 2026
Mehrdad Mohammadinia & Ashkan Maleki	Convicted of mosque/seminary arson under the new espionage law; secretly executed June 1, 2026 at Ghezel Hesar Prison, Karaj.	Iran Human Rights; Hengaw; KHRN

Sources for the named-case table: Iran Human Rights (iranhr.net), Hengaw (hengaw.net), the Kurdistan Human Rights Network, BBC News and RFE/RL (January 13, 2026), and Iran International (February 16, 2026).⁴⁹

V. Catalog of Crimes against Humanity: Methods of Suppression

This section catalogues the specific methods used to suppress the uprising. Taken together they describe not isolated excesses but an organised, multi-instrument campaign of state violence, the factual substrate for the legal analysis in Section IX.

V.A Military-Grade Weapons and Live Ammunition against Civilians

Multiple independent investigations establish that security forces used battlefield weapons against unarmed people. The Fact-Finding Mission reported “extensive lethal force ... including with assault rifles and heavy machine guns.”⁵⁰ Amnesty International verified videos and eyewitness accounts showing forces positioned on streets and on rooftops, of houses, mosques, and police stations: “repeatedly fir[ing] rifles and shotguns loaded with metal pellets at protesters, frequently targeting their heads and torsos.”⁵¹ Human Rights Watch reviewed evidence that “many protesters were killed or injured by gunshot wounds to their heads and torsos,” and concluded that the “wide-scale, unjustified use of lethal force ... indicate[s] that the authorities have deliberately and unlawfully used firearms as state policy.”⁵² Iran’s own foreign-ministry spokesperson, Esmail Baghaei, acknowledged on 12 January that security forces had fired on protesters.⁵³

V.B the Communications Blackout as an Instrument of Atrocity Concealment

The near-total internet and telephone blackout imposed on 8 January was not incidental to the killing, it was the enabling condition for it. Connectivity fell to roughly 2% of normal levels; an estimated 90+ million people were cut off; even Starlink terminals were jammed using what experts described as “military-grade technology.”⁵⁴ Human-rights organisations are unanimous that the shutdown was designed to conceal the crackdown: Amnesty stated the authorities “cut all internet access to conceal their crimes,” and that “once the blackout was in place, security forces

carried out massacres against protesters.”⁵⁵ The pattern was familiar: Iran had used shorter blackouts to mask killings during the November 2019 “Bloody Aban” protests. The 2026 shutdown was the most comprehensive in the country’s history, lasting in various forms until a partial restoration ordered on May 25, 2026.⁵⁶

The shutdown was also an exercise in long-term digital control. Rather than restore the global internet, the authorities pushed Iranians onto a domestic intranet (the National Information Network, the IRGC-backed “halal internet”) that permits selective disconnection from the outside world while preserving regime services and surveillance. HRANA reported a quota system under which commercial-card holders were granted roughly 20 minutes of supervised access per day at chambers of commerce: “transform[ing] the internet from a public service into a security-administrative privilege”, and a government spokeswoman indicated global access would not return until at least the Persian New Year in March.⁵⁷

V.C Night Raids, Enforced Disappearances, Torture, and Sexual Violence

After the massacres, the state imposed nighttime curfews from 9 January and ran a “coordinated, militarized clampdown” of armed patrols and checkpoints, mass home raids, and warrantless arrests.⁵⁸ Detainees were held incommunicado and subjected to enforced disappearance; Amnesty and the Special Rapporteur documented torture and other ill-treatment, including sexual violence, and the Fact-Finding Mission’s evidence pointed to “torture, sexual violence, arbitrary arrests and detentions, and forced confessions.”⁵⁹ CHRI documented that the Ministry of Intelligence ran pre-emptive intimidation campaigns, calling former 2022 detainees in Bojnord, Neyshabur, and Sabzevar to warn them against protesting, and threatened the Iran-based families of activists abroad “to pay the price.”⁶⁰

V.D Systematic Targeting of Medical Professionals and Hospitals

In a grave breach of medical neutrality, security forces attacked hospitals to seize the wounded and the dead and to deny treatment. In Malekshahi/Ilam, after IRGC forces killed at least four people on 3 January, they raided Khomeini Hospital on 3 and 4 January, forcing entry into wards, destroying doors, attempting to arrest injured protesters and remove bodies, and beating medical staff who refused to cooperate; hospitalised children were moved to intensive care under unsafe conditions.⁶¹ On 6 January, forces fired tear gas inside Sina Hospital in Hasanabad (Tehran).⁶² The High Commissioner confirmed that security forces were “even pursuing injured people into hospitals.”⁶³ CHRI’s executive director Hadi Ghaemi stated that “the targeting of children, hospitals, and medical personnel represents especially grave violations ... adding to the regime’s long list of crimes against humanity.”⁶⁴

V.E Targeting of Lawyers and the Right to a Defence

The state moved deliberately to strip detained protesters of legal defence. The High Commissioner reported the detention of “lawyers, human rights defenders, [and] activists”; in the first five months of 2026 at least 32 lawyers were arrested, summoned, prosecuted, or imprisoned.⁶⁵ Named cases include Shima Ghousheh, a Tehran attorney arrested on January 17, 2026 after publicly offering to represent detainees; Enayatollah Keramati, arrested after a raid on his Mashhad home on 10 January; and Amir Bahadorifar and Dariush Ganjehpour Qashqai of the Fars Bar Association, arrested in Shiraz on 22 and 25 January.⁶⁶ The Nobel-recognised human-rights lawyer Nasrin Sotoudeh was arbitrarily arrested on April 1, 2026 and forcibly disappeared for roughly six weeks before release on bail.⁶⁷

V.F Reprisals against Bereaved Families and Desecration of the Dead

The authorities weaponised the bodies of the dead. Both the Special Rapporteur and Human Rights Watch documented that families were coerced into falsely claiming their killed relatives were Basij members “killed by protesters” as a condition of releasing the bodies, and were forced to pay for body retrieval, a practice that simultaneously inflates the regime’s “martyr” count and silences witnesses.⁶⁸ Amnesty reported that authorities “relentlessly and cruelly harassed and intimidated bereaved families of killed protesters,” and that crucial mobile-phone evidence was destroyed when security forces confiscated devices from the dead and detained.⁶⁹

V.G Reported Use of Foreign Militias (Unverified)

Several outlets reported that Iran deployed allied foreign Shia militias to help suppress the protests. Iran International and Fox News, citing sources, reported that roughly 800–850 fighters, predominantly Iraqi (Kataib Hezbollah, Harakat al-Nujaba, Sayyid al-Shuhada, Badr Organization), with some allegedly drawn from the Afghan Fatemiyoun and Pakistani Zainabiyoun brigades, crossed into Iran via the Shalamchah, Chazabeh, and Khosravi border points under the cover of “pilgrimage” trips, and that the Quds Force coordinated a portion of the 8–9 January killings.⁷⁰ This report treats these claims as unverified. The principal independent monitors: Amnesty International, Human Rights Watch, and the UN, have not, in their published findings, confirmed any foreign-militia deployment, and Iran International itself noted that key images and the Fatemiyoun/Zainabiyoun allegations “remain unconfirmed.”⁷¹ The allegation is recorded here for completeness and as a priority line of inquiry for the Fact-Finding Mission; it is not relied upon for the legal conclusions in Section IX, which rest on the conduct of Iran’s own forces.

V.H Premeditation and State Policy

The evidence indicates the massacre was planned and ordered, not the cumulative result of panicked street clashes. The New York Times reported on January 25, 2026 that Ali Khamenei personally ordered the protests crushed “by any means necessary,” and that security forces were given “the green light to kill indiscriminately, including civilians,” to “spread fear and deter further protests.”⁷² Iran International, citing a former Interior Ministry official who had been an IRGC member, reported that long-term preparation for a massacre of this type began in 2022, including “marking and identifying elevated locations for sniper deployment” and “ideological ... and psychological preparation to kill, including firing final shots.”⁷³ Iran International also reported that the order for direct fire came from the Supreme National Security Council, with the approval of all three branches of government, placing command responsibility at the apex of the state (Section VII).⁷⁴

V.I Documented Massacre Geography

Human Rights Watch verified protest imagery in 27 of Iran’s 31 provinces and obtained evidence of killings in at least eight; Amnesty International and CHRI documented additional sites. The table records the most strongly evidenced locations, a partial map, constrained by the blackout, of a nationwide pattern.⁷⁵

Province /city	Documented conduct	Principal source
Tehran (Kahrizak; Behesht-e Zahra)		Amnesty; HRW

Province /city	Documented conduct	Principal source
	Overflowing morgues; ⁷⁵ 205 body bags (Amnesty) ⁷⁶ 400 bodies (HRW) at Kahrizak; witness estimate of 1,500-2,000 at Behesht-e Zahra cemetery.	
Razavi Khorasan (Mashhad)	Large-scale killings; ~150 bodies delivered to a single Mashhad hospital over one night (9-10 Jan).	HRW
Kermanshah	Security forces fired on protesters; witness audio of shooting and tear gas; child arrests in Harsin.	HRW; CHRI
Ilam (Malekshahi)	IRGC killed ⁷⁷ 4 (incl. a child) on 3 Jan; armed raids on Khomeini Hospital (3-4 Jan).	CHRI; ABC News-verified video
Isfahan	~500 protesters with pellet injuries to the eyes admitted to one hospital on 10 Jan; teenagers forced to confess.	UN FFM; CHRI
Alborz (Karaj/Fardis)	Large-scale lethal crackdown; site of Erfan Soltani's arrest and death sentence.	Amnesty; HRW
Gilan; Kohgiluyeh & Boyer-Ahmad; Markazi; Mazandaran	Among provinces where HRW obtained evidence of killings; mass child arrests in Kohgiluyeh & Boyer-Ahmad.	HRW; CHRI

V.J Impunity and the Cycle of Repression

The 2026 massacre is not an aberration but the culmination of a recurring, escalating pattern. Amnesty International states plainly that “impunity for the repeated commission of crimes under international law ... during previous protest crackdowns has fuelled this latest round of violence,” pointing to the November 2019 “Bloody Aban” killings (Amnesty documented at least 304 dead under an internet blackout) and the 2022 Woman, Life, Freedom uprising.⁷⁶ Human Rights Watch framed the same point as a warning: “rulers who massacre their own people will keep committing atrocities until they are held to account.”⁷⁷

This established pattern matters legally as well as morally. The repetition of the same methods, blackout-masked mass shootings, hospital raids, the blinding of protesters, summary capital trials, across 2019, 2022, and 2025-2026 reinforces the conclusion that the 2026 killings were the product of a deliberate, known state policy rather than isolated excess, and that responsible officials acted with knowledge of the predictable consequences (Section IX.A, IX.C).

VI. Institutional Accountability Mapping

Responsibility for the crackdown is distributed across an integrated repression architecture. Amnesty International identified the core operational perpetrators directly: “the Islamic Revolutionary Guard Corps (IRGC), including its Basij battalions and various divisions of Iran’s police force, known by its Persian acronym FARAJA, as well as plain-clothes agents.”⁷⁸

The Supreme Leader and the Supreme National Security Council (SNSC). Ali Khamenei set the policy (“rioters ... put in their place,” January 3, 2026) and, per multiple reports, ordered the protests crushed by any means; the SNSC reportedly issued the order for direct fire. The SNSC’s Secretary at the time, Ali Larijani, has been named by former officials as a key planner. Both men are dead: Khamenei was killed on February 28, 2026 and Larijani on March 17,

2026.⁷⁹ The office of Supreme Leader passed to Mojtaba Khamenei; the SNSC secretariat passed to Mohammad Bagher Zolghadr in late March 2026 and to Mohsen Rezaei on August 9, 2026.⁸⁰ The institutions, not only the individuals, carry responsibility.

The IRGC (incl. the IRGC Intelligence Organization and Quds Force). The IRGC was the lead instrument of lethal force, e.g., the 3 January killings in Malekshahi/Ilam, and its intelligence arm threatened journalists before the blackout and ran the post-massacre information control. Its Quds Force is the alleged conduit for any foreign-militia involvement (Section V.G).

The Basij Resistance Force. A mass paramilitary under IRGC command, deployed in plain clothes for street violence and campus attacks; the regime’s practice of coercing families to mislabel dead civilians as “Basij” both inflated its martyr rolls and concealed the civilian death toll.

FARAJA (Law Enforcement Command), including Special Units and Public Security Police. Iran’s national police, named by CHRI alongside the IRGC and Special Police Units as “primarily responsible for the violence.” FARAJA chief Ahmadreza Radan publicly confirmed day-and-night patrols with the Basij.

The Ministry of Intelligence (MOIS). Ran pre-emptive intimidation (threatening calls to former detainees), enforced disappearances, and the coercion of confessions and families, as documented by CHRI and the Special Rapporteur.

The Judiciary and the Revolutionary Courts. Judiciary Chief Mohseni Ejei ordered “no leniency” and the rapid prosecution of protesters for capital offences; Revolutionary Court judges (notably Abolqasem Salavati and Iman Afshari) issued death sentences in summary proceedings reliant on coerced confessions.

State media organs (IRIB, Tasnim, Fars). State broadcaster IRIB aired nearly 100 forced “confessions,” lending the machinery of due-process violation a propaganda veneer; the IRGC-affiliated Tasnim was, by RSF’s account, effectively the only channel publishing during the blackout, disseminating official framing while independent outlets were silenced.

Telecommunications enablers. The state body holding the legal monopoly on Iran’s international bandwidth is the technical chokepoint through which SNSC shutdown orders are executed; the country’s fixed-line and mobile operators implemented the January 8, 2026 blackout. Their ownership runs in part through Setad and the foundations (Section X.B); only officially designated entities are named in this report as sanctions or divestment targets.⁸¹

VII. Individual Accountability: Named Officials

Framing. Inclusion in the table below reflects a person’s command position or sourced public reporting of their role; it is not a judicial finding of individual criminal guilt, which is for a competent court to determine. The table now carries a status column. Several officials who held command during the crackdown have been killed in the war; they are marked deceased with dates and kept in the record because the institutions they led remain responsible. Designation status is given as of October 4, 2026; where this edition could not confirm a listing against the official consolidated list, the entry says so.

Official	Position during crackdown	Status at 4 Oct 2026	Documented role	Designation status
Ali Khamenei	Supreme Leader	Deceased (killed 28 Feb 2026)	Set the policy line (“rioters ... put in their place,” 3 Jan 2026); reportedly ordered protests crushed “by any means necessary.”	US (E.O. 13876, 24 Jun 2019). Historical record only.
Mojtaba Khamenei	Son of the Supreme Leader; influence over the Supreme Leader’s office and security organs (reported)	Supreme Leader since March 8, 2026	Now holds the constitutional command of the IRGC, Basij, and security services that carried out the crackdown and its continuing executions. His role during the crackdown itself is reported, not established.	US (E.O. 13876, 4 Nov 2019). Not on EU, UK, Canadian, or Australian lists (official list check, 4 Oct 2026).
Ali Larijani	Secretary, Supreme National Security Council	Deceased (killed 17 Mar 2026)	Named by former officials as a key planner; the SNSC reportedly ordered direct fire.	US (E.O. 13876, 15 Jan 2026); Canada (SEMA, 11 Oct 2022). Historical record only.
Mohsen Rezaei	Former IRGC commander-in-chief; not in a crackdown command post (reported)	SNSC Secretary since August 9, 2026	Heads the body that reportedly ordered live fire in January 2026; charged in Argentina over the 1994 AMIA bombing (21 Sep 2026).	US (IRAN-EO13876). Not on EU, UK, Canadian, or Australian lists (official list check, 4 Oct 2026). INTERPOL Red Notice (AMIA).
Ahmad Vahidi	Senior IRGC officer	IRGC Commander-in-Chief since early Mar 2026	Commands the IRGC, whose forces led the lethal suppression and whose intelligence arm runs post-massacre repression; ordered to trial in absentia in Argentina over the AMIA bombing (21 Sep 2026).	US; EU (2008); UK; Canada (3 Oct 2022); Australia. INTERPOL Red Notice (AMIA).
Mohammad Pakpour	IRGC Commander-in-Chief (to 28 Feb 2026)	Deceased (killed 28 Feb 2026)	Commanded the IRGC during the 8 to 9 Jan massacres; chaired Bonyad Taavon Sepah.	IRGC designated as an entity (US FTO 2019; EU terrorist list 2026; Canada 2024; UK State Threats Act designation, 17 Jul 2026).
Gholamreza Soleimani	Basij Commander	Deceased (killed 17 Mar 2026)	Commanded the Basij paramilitary deployed against protesters and campuses.	US; EU (12 Apr 2021); UK (10 Oct 2022); Canada (3 Oct 2022); Australia (2022).
Masoud Pezeshkian	President	In office (UNGA address, 23 Sep 2026)	Head of the executive throughout; ordered the blackout ended (May 25, 2026).	Not on US, EU, UK, Canadian, or Australian lists.
Gholamhossein Mohseni Ejei	Judiciary Chief	In office (active 28 Sep 2026)	Ordered prosecutions “without leniency”; drove rapid capital trials that have continued through September 2026.	US (2010); EU (12 Apr 2011); UK; Canada (3 Oct 2022). Not Australia.
Ahmadreza Radan	FARAJA Commander-in-Chief (police)	In office (public remarks, Sep 2026)	Commanded national police; confirmed day-and-night Basij/police patrols.	US (2011); EU; UK; Canada (17 Sep 2024); Australia (3 Feb 2026).
Abolqasem Salavati	Judge, Tehran Revolutionary Court	Not reported	Issued protest death sentences in summary proceedings (100+ death sentences in his career).	US; EU; UK; Canada (7 Dec 2022). Not Australia.
Iman Afshari	Judge, Tehran Revolutionary Court	Not reported	Issued death and severe sentences in protest cases.	EU (29 Jan 2026); UK (8 Dec 2022); Canada (7 Dec 2022). Not US or Australia.
Eskandar Momeni	Interior Minister	In office (Sep 2026)	Political oversight of FARAJA and internal security; named by Canada for digital repression.	US (30 Jan 2026); EU (29 Jan 2026); UK (2 Feb 2026); Australia

Official	Position during crackdown	Status at 4 Oct 2026	Documented role	Designation status
				(May 12, 2026); Canada (in force 22 Sep 2026).
Mohammad Movahedi-Azad	Prosecutor General	Not reported	Directed nationwide prosecution policy against detainees.	EU (29 Jan 2026) only.
Provincial commanders	LEF/IRGC, Lorestan and Fars	Not reported	Hashemifar and Maleki (LEF), Bagheri and Bouali (IRGC): local command of lethal suppression.	All four US (15 Jan 2026). Hashemifar UK (2 Feb 2026); Maleki EU and UK (14 Nov 2022); Bouali UK (2 Feb 2026) and EU (16 Mar 2026); Bagheri US only.

Sources and note on designations. Roles are drawn from Amnesty International, CHRI, OHCHR statements, and reporting cited in Sections III to VI; deaths and appointments from the reporting cited below.⁸²⁷⁷⁹⁸⁰⁸³ Mojtaba Khamenei's US designation is confirmed on the OFAC SDN list (program IRAN-EO13876).⁸⁴ Designation status was checked by name against the official list files on October 4, 2026: the OFAC SDN list, the EU consolidated financial sanctions list (generated September 22, 2026), the UK sanctions list (October 2, 2026), Canada's SEMA list, and the Australian DFAT consolidated list (updated September 1, 2026).⁸⁵ Mojtaba Khamenei and Mohsen Rezaei appear only on the US list.

VII.B Selected Perpetrator Profiles

Mojtaba Khamenei, Supreme Leader. Named Supreme Leader on March 8, 2026, confirmed March 9, after his father was killed on February 28, 2026, Mojtaba Khamenei now holds constitutional authority over the IRGC, the Basij, and the security services, and therefore over the institutions that carried out the crackdown and that continue to execute protesters (Section XI.D).⁷ The United States designated him under E.O. 13876 on November 4, 2019.⁸⁴ Reporting in 2026 has described a property and financial network held through intermediaries in Europe and the Gulf; Euronews reported in March 2026 that his assets in the eurozone faced no formal EU legal constraint.⁸⁶ He is not on the EU, UK, Canadian, or Australian lists.⁸⁵ (Inference, labelled: any EU, UK, Canadian, or Australian designation would have to rest on his current command authority and on the continuing executions, since his personal role in January 2026 is reported rather than established.)

Mohsen Rezaei, Secretary, Supreme National Security Council. A former IRGC commander-in-chief (1981 to 1997), Rezaei became SNSC secretary on August 9, 2026, succeeding Mohammad Bagher Zolghadr, who had replaced the late Ali Larijani in late March 2026.⁸⁰ On September 21, 2026 an Argentine court ordered Rezaei and Ahmad Vahidi to stand trial in absentia over the 1994 bombing of the AMIA Jewish community centre in Buenos Aires, which killed 85 people, and ordered an asset freeze.⁸³

Ahmad Vahidi, IRGC Commander-in-Chief. Vahidi succeeded Mohammad Pakpour after Pakpour was killed on February 28, 2026.⁸⁷ He commanded the IRGC Quds Force at the time of the AMIA bombing, has long been the subject of an INTERPOL Red Notice, and is the principal defendant in the trial in absentia ordered on September 21, 2026.⁸³

Gholamhossein Mohseni Ejei, Judiciary Chief. A former Minister of Intelligence, Ejei ordered prosecutors on January 5, 2026 to act “without leniency” and to fast-track protester trials, and tied detainees to Israel and the US. The courts under his authority have continued to impose and carry out protest-related death sentences through September 2026. He has been US-sanctioned since 2010 (E.O. 13553) and is EU-listed.⁸⁸

Ahmadreza Radan, FARAJA Commander-in-Chief. Police chief since January 2023, Radan was already sanctioned over Kahrizak-era abuses from 2009 (US 2011; EU; Canada 2024). During the crackdown he confirmed round-the-clock police and Basij patrols.⁸⁹

Abolqasem Salavati, Judge, Tehran Revolutionary Court. Known for years as the “hanging judge,” Salavati has issued more than 100 death sentences against political defendants in summary proceedings widely condemned as unfair. He is sanctioned by both the United States and the European Union.⁹⁰

The deceased. Ali Khamenei (killed February 28, 2026), Mohammad Pakpour (killed February 28, 2026), Ali Larijani (killed March 17, 2026), and Basij commander Gholamreza Soleimani (killed March 17, 2026) held command during the January 2026 massacres.^{91,92} Their deaths end any prospect of individual prosecution but do not alter the documentary record of the institutions they led, which remain in operation under their successors.

VIII. Farsi Media and OSINT Verification

Because Iran barred international media and human-rights monitors and severed communications, the evidentiary record was reconstructed through open-source intelligence (OSINT), forensic video analysis, and Farsi-language and diaspora reporting. Understanding these methods is essential to the dossier’s credibility.

Pre-blackout capture and post-blackout exfiltration. Before 8 January, hundreds of protest videos were posted to social media and Iranians spoke directly to foreign-based journalists. After the blackout, a minority of Iranians used banned Starlink terminals to send footage; one activist described a source travelling roughly 600 miles to upload a single video. The authorities responded by jamming Starlink with “military-grade” equipment and seizing terminals and satellite dishes.⁹³

Forensic verification by monitors. HRANA’s 50-day report rests on more than 143,330 reports cross-checked through a multi-team methodology that explicitly addressed “risks from manipulated, fabricated, or AI-generated content.” Human Rights Watch analysed 51 verified photographs and videos, used the volunteer geolocation platform GeoConfirmed, and consulted the Independent Forensic Expert Group of the International Rehabilitation Council for Torture Victims; it verified protest imagery in 27 of Iran’s 31 provinces. Amnesty International’s Crisis Evidence Lab geolocated and authenticated the Kahrizak morgue footage (identifying at least 205 body bags).⁹⁴

Diaspora and Farsi-language media. Outlets including BBC Persian, Iran International, RFE/RL’s Radio Farda, Manoto, and IranWire served as collection points for testimony and video. CNN’s 23 January investigation, “The night Iran went dark,” compiled witness accounts and video of the blackout-period violence; Iran International’s editorial board compiled a named list of 6,634 dead and obtained leaked internal figures from the Interior Ministry, parliament, and the IRGC Intelligence Organization.⁹⁵

Counter-intelligence caution. NetBlocks warned that the “online information vacuum is resulting in the amplification of pro-regime accounts, AI fakes, and other agendas.” The major monitors’ insistence on minimum-verifiable counts (Section IV) is a direct, methodologically sound response to that risk, and a reason the conservative confirmed totals, not the maximal estimates, anchor this report’s legal conclusions.⁹⁵

IX. Legal Predicate: Crimes against Humanity

The documented conduct satisfies the definition of crimes against humanity in Article 7 of the Rome Statute of the International Criminal Court, which both codifies customary international law and is invoked directly by the actors closest to the evidence. The UN Fact-Finding Mission is mandated to determine whether “crimes under international law” occurred and to identify “the State structures enabling the violence”; HRANA’s report includes a legal assessment framing the patterns as potential international crimes; and former ICC/ICTY prosecutor Payam Akhavan told the Human Rights Council that these acts constitute “crimes against humanity” and an “extermination.”⁹⁶

IX.A the Chapeau: A Widespread and Systematic Attack Pursuant to State Policy

Article 7 requires that the enumerated acts be committed “as part of a widespread or systematic attack directed against any civilian population, with knowledge of the attack,” pursuant to or in furtherance of a “State or organizational policy.” Each element is met:

- ^AWidespread. The attack spanned all 31 provinces and 200+ cities, with thousands killed and tens of thousands detained over a compressed period, a scale UN officials called the deadliest since 1979.
- ^ASystematic. The violence was organised and patterned: pre-positioned rooftop snipers, coordinated escalation after 8 January, a synchronized nationwide blackout, uniform charging of detainees with moharebeh, and a standardized practice of coercing families over bodies. Reporting indicates planning since 2022.
- ^ADirected against a civilian population. The victims were unarmed protesters and bystanders, including children, medical patients, and mourners, not combatants.
- ^AState policy. Per multiple reports, the order for live fire issued from the Supreme National Security Council and the then Supreme Leader, Ali Khamenei, with the stated purpose of “spread[ing] fear”, the hallmark of policy, not accident.

Note: Crimes against humanity require no armed conflict, so they are independent of the separate war that began February 28, 2026. The chapeau is satisfied by the December to February crackdown on its own facts. The UN Fact-Finding Mission reached the same conclusion in September 2026 (Section XI.B).⁹

IX.B Enumerated Acts (Article 7(1)) Mapped to the Evidence

Act (Rome Statute Art. 7(1))	Documented conduct in this report
Murder: Art. 7(1)(a)	Mass shootings of protesters and bystanders (8–9 Jan); confirmed deaths from 3,038 (official) to 7,007 (HRANA) and far higher estimates. (Section IV.A, V.A)

Act (Rome Statute Art. 7(i))	Documented conduct in this report
Extermination: Art. 7(i)(b)	Mass killing of a civilian population on a scale a former ICTY prosecutor called “extermination”; morgues overflowing at Kahrizak and Behesht-e Zahra. (Sections I, IV.A)
Imprisonment /severe deprivation of liberty: Art. 7(i)(e)	50,000+ arbitrary arrests, including children; warrantless home raids; incommunicado detention. (Section IV.D)
Torture: Art. 7(i)(f)	Torture and ill-treatment in custody; torture-extracted confessions used in capital cases. (Sections IV.D, V.C)
Enforced disappearance: Art. 7(i)(i)	Thousands held without family contact or acknowledgement; disappeared children; lawyers (Sotoudeh) disappeared. (Sections IV.D, V.E)
Persecution: Art. 7(i)(h)	Targeting of an identifiable group, protesters/dissidents (and disproportionately Kurdish and other minority communities), on political grounds, through killing, detention, and reprisal. (Sections IV-V)
Rape /sexual violence: Art. 7(i)(g)	Sexual violence in detention documented by Amnesty and referenced by the UN FFM. (Section V.C)
Other inhumane acts: Art. 7(i)(k)	Deliberate blinding via pellets to the eyes; armed denial of medical care and hospital raids; coercion of bereaved families and desecration/withholding of the dead. (Sections IV.C, V.D, V.F)

IX.C Modes of Liability and Command Responsibility

Responsibility is not confined to the individual shooters. Under Article 25 (individual responsibility, including ordering and contributing to a common purpose) and Article 28 (command/superior responsibility), liability extends to commanders and civilian superiors who ordered, knew of, or failed to prevent or punish the crimes. The reported issuance of the live-fire order by the Supreme National Security Council and the Supreme Leader, the operational command exercised by the IRGC, Basij, and FARAHA leadership, and the judiciary’s direction of summary capital trials, together implicate the apex of the Iranian state. Command responsibility attaches to the office holders of the time; the successors now in post bear responsibility for the continuing executions and the continuing denial of remedy. The Iranian government’s own official death toll and published victims list are themselves admissions that unlawful killing occurred on a mass scale.⁹⁷

IX.D Pathways to Accountability

Iran signed but never ratified the Rome Statute, so the ICC lacks automatic jurisdiction, and a Security Council referral is realistically subject to veto. Accountability therefore runs through several complementary channels, which sanctions and divestment should reinforce rather than replace:

^AEvidence preservation. The UN Fact-Finding Mission’s renewed two-year mandate expressly includes preserving evidence “for potential future legal proceedings.” Funding and cooperation with it is the single highest-leverage accountability measure.

^AUniversal jurisdiction. Third states can prosecute perpetrators present in their territory, as Sweden did in convicting former Iranian official Hamid Nouri (2022) for the 1988 prison massacres. Diaspora-supported case-building and travel-ban enforcement make this credible.

^ATargeted sanctions and a special tribunal. Magnitsky-style designations (Section X) and, in the longer term, a dedicated international or hybrid tribunal, as envisaged by Professor Akhavan, provide forums beyond the ICC’s current reach.

The legal threshold for the sanctions and divestment predicate is met: there is a credible, multiply-sourced basis to conclude that Iranian state institutions committed crimes against humanity, which is more than sufficient to justify the sanctions and divestment measures that follow.⁹⁸

X. Sanctions and Divestment Predicate

This concluding section converts the factual and legal record into a targeting framework: what is already designated, where the gaps are, which economic entities sustain the repressive apparatus, the legal mechanics that make divestment durable, and concrete recommendations.

X.A Existing Designations and Gaps

The crackdown triggered a wave of designations in 2026, predominantly person-level, and institutional gaps remain. The United States added SNSC Secretary Ali Larijani (since killed) and four provincial LEF/IRGC commanders (January 15, 2026); the European Union listed 15 persons and 6 entities (January 29, 2026), placed the IRGC on its terrorist list for the first time (February 19, 2026), and added 16 more persons and 3 entities including the head of the Prisons Organization (March 16, 2026); the United Kingdom designated 10 individuals plus FARAJA as an organisation (February 2, 2026); Canada added 7 individuals (February 14, 2026) and a further five individuals and five entities, including Interior Minister Eskandar Momeni, on September 23, 2026 (reported); and Australia imposed targeted financial sanctions in response to the repression on February 3, 2026.⁹⁹¹⁰⁰¹⁰¹ Since July the United States has moved further, through Operation Economic Outcast (Section XI.F).

The designation picture at October 4, 2026:

^AThe UK designated the IRGC under the National Security (State Threats) Act 2026. The designation order was laid before Parliament on July 13, 2026 and took effect on July 17, 2026, when the IRGC was among the first groups designated as a threat to national security.¹⁰² This is a designation under the State Threats Act, not a proscription under the Terrorism Act 2000. It brings the UK alongside the US (FTO, 2019), the EU (February 2026), and Canada (2024), and gives the UK new powers against those who deal with the Corps and its front companies.

^AThe new Supreme Leader is sanctioned only by the United States. Mojtaba Khamenei has been on the OFAC SDN list since November 4, 2019 and is not on the EU, UK, Canadian, or Australian lists; the same is true of SNSC Secretary Mohsen Rezaei. IRGC commander-in-chief Ahmad Vahidi, by contrast, is listed in all five jurisdictions.⁸⁵

^AThe national Prisons Organization is not cleanly designated as an institution by the US. Only Evin Prison is US-listed; the EU designated the Prisons Organization's head in March 2026, but the institution itself, central to torture and executions, remains under-targeted.

^AAustralia acted on February 3, 2026 with targeted financial sanctions in response to the repression; coverage of several enabling bodies (for example the IRGC Intelligence Organization's provincial corps and telecom enforcers) remains uneven across all jurisdictions.¹⁰¹

Target	US	EU	UK	Canada
IRGC: terrorist or state-threat designation	Yes (FTO 2019)	Yes (Feb 2026)	Yes (State Threats Act, 17 Jul 2026)	Yes (2024)
IRGC, economic/HR sanctions	Yes	Yes	Yes	Yes
Basij Resistance Force	Yes (2011)	Yes	Yes	Yes
FARAJA /police (entity)	Yes (2011)	Officers	Yes (Feb 2026)	Officials
MOIS (entity)	Yes (2012)	Partial	Partial	Partial
Prisons Organization (institution)	Evin only (gap)	Head only	No	Individuals
Ali Khamenei (deceased 28 Feb 2026)	Yes (2019)	No	No	No
Mojtaba Khamenei (Supreme Leader)	Yes (4 Nov 2019)	No	No	No
Mohsen Rezaei (SNSC Secretary)	Yes	No	No	No

Reading the table: “Yes” denotes a standing designation; “gap,” “No,” or “None found” marks an unaddressed target. Individual entries were checked against the official list files on October 4, 2026; entity rows carry over from the July 19, 2026 edition. Australia is not shown in the table: it lists neither Mojtaba Khamenei nor Rezaei. Full authorities and dates are in the Sanctions Monitor at <https://iran.meforum.org/designations>.¹⁰³

X.B Economic and Divestment Targets

Sanctions punish individuals; divestment drains the economic base of the repression apparatus. The US Treasury has stated that four conglomerates, the IRGC’s Khatam al-Anbiya, the Execution of Imam Khomeini’s Order (EIKO/“Setad”), Astan Quds Razavi, and Bonyad Mostazafan: “are said to control more than half of the Iranian economy.”¹⁰⁴ In this report Treasury’s qualifier is retained; the claim is Treasury’s, not an independent measurement. These are the structures a divestment campaign should isolate. Scale figures below are sourced estimates; these entities are deliberately opaque and precise valuation is impossible, so figures are presented as dated estimates, not current facts.

Entity	Sector	Link to the repressive apparatus	Designation / divestment note
Khatam al-Anbiya Construction HQ (GHORB)	Engineering, oil & gas, infrastructure	The IRGC’s economic engine; “owned or controlled by the IRGC,” funding its operations via no-bid contracts.	US-designated E.O. 13382 (2007); Treasury: “owned or controlled by the IRGC,” with hundreds of subsidiaries (see §X.E).
Bonyad Taavon Sepah (IRGC Cooperative Foundation)	Investment holding, banking	Treasury: US Treasury designation JY-1209 (Bonyad Taavon Sepah), January 23, 2023 Chaired by the IRGC C-in-C.	US-designated (E.O. 13382, 2010; HR authority 2023). Includes Ansar Bank, Mehr Eqtesad Bank.
EIKO / “Setad”	Diversified (finance, pharma, energy, telecom)	Controlled directly by the Supreme Leader; built by confiscating property of Baha’is, minorities, and dissidents.	US E.O. 13599 (2013), re-designated E.O. 13876 (2021). Reuters estimated ~\$95bn (2013, dated).
Bonyad Mostazafan	Conglomerate (~160 holdings)	Supreme-Leader-controlled; ex-IRGC leadership; controls IEDC and telecom holdings.	US-designated E.O. 13876 (2020) with ~51 companies. >1% of GDP (Treasury).
Astan Quds Razavi	Religious endowment + commercial empire	Custodian appointed by the Supreme Leader; hosts a Basij unit.	US-designated E.O. 13876 (2021) with nine subsidiaries; controls the Razavi Economic Organization’s holdings.

Entity	Sector	Link to the repressive apparatus	Designation / divestment note
Setad telecom holdings	Telecommunications	Executed the 8 Jan 2026 blackout that concealed the massacres; the country's main fixed-line operator and its mobile arm are controlled via Setad.	Setad is US-designated (E.O. 13876). Individual operators are named here only where officially designated.
Chinese “teapot” refineries	Oil purchasing	Buy ~90% of Iran’s ~\$48-49bn/yr oil exports, the regime’s core revenue stream sustaining the security state.	OFAC has designated named refineries (e.g., Hengli, Shandong Shengxing) since 2025; only designated refiners are named as targets.
Shamkhani shadow-shipping network	Oil smuggling / shadow fleet	Mohammad Hossein Shamkhani’s UAE- and Marshall-Islands-based network moves Iranian oil for the armed forces and IRGC through a web of front companies and vessels.	OFAC designated the network on July 14, 2026 (IRAN-EO13902): incl. House of Shipping Investment, Aare Lines, Ava Tarabar Darya, Glavos and Dezera Shipping, designated targets.

X.C Divestment Mechanics and Legal Precedent

Divestment is most durable when it rides existing legal authority. The Comprehensive Iran Sanctions, Accountability, and Divestment Act of 2010 (CISADA), §202, authorises US state and local governments to divest from any person with a qualifying investment (US\$20 million or more) in Iran’s energy sector, and contains a non-preemption clause drafted to survive the kind of constitutional challenge that struck down the Massachusetts Burma law in *Crosby v. NFTC* (2000).¹⁰⁵ Building on the Iran Sanctions Act of 1996 and the SEC disclosure requirement of §219 of the 2012 Iran Threat Reduction and Syria Human Rights Act (which requires public issuers to disclose Iran-related activity on EDGAR), many US states have enacted Iran divestment or contracting measures, including Florida (Fla. Stat. §215.473), California (AB 221, 2007), and North Carolina (Iran Divestment Act of 2015); a precise count is not given here.¹⁰⁶

Two state programs are ready-made templates. Florida’s Protecting Florida’s Investments Act (2007) directs the State Board of Administration to publish, and require divestment from, a quarterly list of scrutinized companies with activities in Iran’s petroleum and energy sectors. California’s AB 221 (2007) drove CalPERS to divest from companies with Iran exposure.¹⁰⁷ Universities, public pensions, and asset managers can adopt comparable screens extended to the designated IRGC and foundation conglomerates and the designated Chinese refiners identified in Section X.B.

X.D Recommended Actions

These recommendations are addressed to foreign governments, international bodies, and private-sector investors. They are not addressed to the US Congress and do not concern US legislation.

FOR GOVERNMENTS OUTSIDE THE UNITED STATES

^ADesignate the living chain of command. The EU, the UK, Canada, and Australia should consider designating Supreme Leader Mojtaba Khamenei and SNSC Secretary Mohsen Rezaei, neither of whom is on their lists (Vahidi already is), together with the Revolutionary Court judges (e.g., Salavati, Afshari) and commanders named in Section VII who are not yet listed in each jurisdiction.

^ADesignate the national Prisons Organization as an institution, given its role in torture and in the executions recorded in Section XI.D.

^AEnforce the new UK State Threats Act designation of the IRGC, and the EU terrorist listing, against the front-company and shadow-fleet networks in Section X.B.

^AFund and support the UN Fact-Finding Mission and the Special Rapporteur, including evidence preservation for future prosecutions, and act on the Mission's call to preserve sites of past atrocities such as Gohardasht prison (Section XI.H).

^APursue universal-jurisdiction cases against perpetrators who travel, building on the Hamid Nouri precedent; enforce travel bans; and cooperate with Argentina's AMIA proceedings against Vahidi and Rezaei.

^ATighten export controls on surveillance and crowd-control technology and on the telecom equipment used to impose the blackout.

FOR UNIVERSITIES, PENSION FUNDS, AND ASSET MANAGERS

^ADivest from the designated IRGC and foundation conglomerates (Khatam al-Anbiya, Bonyad Taavon Sepah, Setad, Bonyad Mostazafan, Astan Quds Razavi) and from designated Chinese refiners that buy Iranian oil; adopt a Florida-style scrutinized-companies screen.

^AScreen holdings for indirect exposure to designated Iranian telecom operators that enforced the blackout.

FOR CORPORATIONS AND FINANCIAL INSTITUTIONS

^AExit exposure to designated Iranian entities, comply fully with SEC §13(r) Iran disclosure where applicable, and terminate any supply of surveillance or dual-use technology to designated entities.

FOR CIVIL SOCIETY AND THE DIASPORA

^ABuild and maintain evidentiary case files (this report and the Ledger's records are a starting point), support victims and bereaved families, counter transnational repression, and coordinate with accountability bodies so that economic pressure and legal accountability reinforce one another.

Humanitarian guardrail. Consistent with the warnings of the UN High Commissioner, who urged the international community to address the impact of broad sanctions on ordinary Iranians, measures should be precision-targeted at the repressive apparatus and its economic base, not at the Iranian people.¹⁰⁸

X.E Annex: Designation Baseline and Detailed Economic Targets

Pre-2026 designation baseline (selected). The 2026 wave built on a substantial pre-existing architecture, summarised below; the gaps in Section X.A persist despite it.

Target	Body	Authority	Date
IRGC + IRGC-Qods Force (Foreign Terrorist Organization)	US	INA §219 (FTO)	15 Apr 2019
IRGC, Basij, and Law Enforcement Forces (HR)	US	E.O. 13553	9 Jun 2011
Ali Khamenei (deceased) + Supreme Leader's Office	US	E.O. 13876	24 Jun 2019
Mojtaba Khamenei	US	E.O. 13876	4 Nov 2019
Ministry of Intelligence (MOIS)	US	E.O. 13224 / 13553	16 Feb 2012

Target	Body	Authority	Date
Morality Police (Gasht-e Ershad) + LEF officials	US	E.O. 13553	22 Sep 2022
Evin Prison	US	E.O. 13553	May 30, 2018
IRGC (terrorist entity)	Canada	Criminal Code	19 Jun 2024
Iran human-rights sanctions regime (Basij, judges, etc.)	EU	Reg. 359/2011	2011 (expanded 2022-23)
IRGC (EU terrorist list)	EU	Common Position 2001/931	19 Feb 2026

Khatam al-Anbiya (GHORB), selected designated subsidiaries. The IRGC’s construction conglomerate operates through hundreds of companies; the following are individually US-designated and illustrate sector reach for divestment screening.¹⁰⁹

Subsidiary	Sector / project	US designation
Sepanir Oil & Gas Engineering	Oil & gas; South Pars phases 15 & 16	E.O. 13382 (2010)
Oriental Oil Kish	Petroleum services	E.O. 13382 (2007)
Sepasad Engineering	Dams, tunnels; Tehran Metro Line 7	E.O. 13382 (2007)
Ghorb Nooh; Omran Sahel; Gharargahe Sazandegi Ghaem	Construction / engineering	E.O. 13382 (2007)
Fater; Imensazan (ICEI); Makin; Rahab	Mining & engineering	E.O. 13382 (2010)
Rah Sahel	Construction (Tombak gas plant)	E.O. 13382 (2010)

Chinese purchasers of Iranian oil, divestment/secondary-sanctions targets. Iran’s oil revenue (~US\$48-49bn/yr) is overwhelmingly sold to China; OFAC has named specific “teapot” refineries and traders since 2025, making them concrete divestment and screening targets.¹¹⁰

Entity	Type	US designation
Hengli Petrochemical (Dalian)	Major “teapot” refinery	24 Apr 2026
Shandong Shengxing Chemical	Refinery (>\$1bn crude; IRGC-QF front)	16 Apr 2025

Divestment precedent specifics. Florida’s scrutinized-companies list and CalPERS divestments under California’s AB 221 provide both the legal template (Section X.C) and working screening methods that institutions can extend to the designated IRGC and foundation conglomerates above.¹¹¹

X.F Momentum: The Emerging International Response

The campaign does not start from zero; it extends a response already underway. On January 23, 2026 the UN Human Rights Council held its 39th Special Session and adopted, by 25 votes to 7 with 14 abstentions, a resolution tasking the Fact-Finding Mission with an urgent investigation and extending its mandate for two years and the Special Rapporteur’s for one. The High Commissioner issued seven demands to Iran’s leadership, end the repression, release the arbitrarily detained, impose a moratorium on the death penalty, end the internet shutdown, hold independent investigations, undertake reforms, and (to the wider world) address the humanitarian impact of broad sanctions.¹¹²

In parallel, the United States, the European Union, the United Kingdom, Canada, and Australia each ran fresh designation rounds (Section X.A); the EU placed the IRGC on its terrorist list for the first time; and the UK designated the IRGC under the State Threats Act in July 2026. In January 2026 President Trump warned Tehran against killing protesters and against mass executions, and a US aircraft-carrier group was deployed to the region.¹¹³ The September 2026 Fact-Finding Mission report, the September 30, 2026 joint statement at the Human Rights Council, and Argentina's AMIA proceedings (Section XI) extend that response.

Civil society mobilised internationally: Iranian diaspora protests recurred in the United Kingdom and other countries through January 2026.¹¹⁴

XI. Since July: The Record through October 4, 2026

This section records developments between the July 19, 2026 edition and October 4, 2026. As elsewhere in this report, war-related events are kept separate from the crackdown record.

XI.A the War Resumed

The ceasefire of early April 2026 did not hold. The United States and Iran exchanged strikes around 30 to August 31, 2026, including strikes on Larak Island in the Strait of Hormuz; Iran resumed strikes on August 31, 2026, and fighting continued into September 2026. Iran reported at least 11 civilian deaths in US strikes on September 1, 2026; no primary source has established an aggregate war toll.³ Casualties of the war are not counted in this report's crackdown statistics. The resumption matters to the crackdown record in one respect: rights groups have documented the authorities' use of wartime conditions as a pretext for executions and arrests (Section XI.D).⁴⁰

XI.B the UN Fact-Finding Mission's Report (A/HRC/63/61)

The UN Independent International Fact-Finding Mission on the Islamic Republic of Iran presented its report to the 63rd session of the Human Rights Council (advance unedited version dated September 14, 2026, document A/HRC/63/61). The Mission found that "many gross human rights violations by Iran amount to the crimes against humanity of murder, imprisonment..., torture, and other inhumane acts" (para. 121).⁹

The Mission also examined conduct in the war. It found reasonable grounds to believe that the United States committed the war crime of launching an indiscriminate attack in the February 28, 2026 strike that hit a school in Minab (paras. 124 to 126), and made the same finding regarding a strike in Lamerd (para. 128).⁹¹¹⁵ Those findings concern the war, not the crackdown, and are recorded here so that the Mission's report is presented in full.

XI.C Iran Human Rights' Named List of the Dead

Iran Human Rights (IHRNGO) published "The January 2026 Protest Killings in Iran," which identifies 4,219 people killed by name, including at least 420 women and 281 children, against the government's official figure of 3,038: the Fact-Finding Mission reports that the government "settled on an official figure of 3,038" in early February 2026;

France24 reported the earlier 21 January figure of 3,117 (<https://www.france24.com/en/middle-east/20260121-how-many-people-killed-crackdown-iranian-protesters>).¹¹⁶⁹ The named list is a minimum of a different kind from HRANA's 7,007 confirmed deaths (Section IV.A): it counts only victims whose identities IHRNGO has verified. The two figures are complementary, not contradictory. (The publication date of the IHRNGO report was not confirmed on its page for this edition.)

XI.D Executions since July

The pace of protest-related executions rose after July 19, 2026.

^AJuly 15, 2026: Mohammad Amini Dehaghani was hanged for moharebeh and efsad-e fel-arz over the January 9, 2026 arson of a governor's office in Dehaghan, Isfahan province.⁴⁰

^AJuly 28, 2026: Amnesty International called for an end to an “escalating campaign of arbitrary executions and death sentences against protesters.”⁴⁰

^ASeptember 10, 2026: Human Rights Watch described an “ongoing unlawful execution campaign against protesters,” set against a rise in executions overall; the Boroumand Center recorded at least 2,113 executions in 2025, the highest known annual number since the late 1980s.¹¹⁷

^ASeptember 30, 2026: Majid Nikandish (25, from Quchan) and Ali Hemmati-Sistani were executed at dawn in Mashhad over the January protests.¹¹⁸

^AAs of September 30, 2026, IHRNGO counted at least 33 protesters executed since March 18, 2026, 31 of them in connection with the January 2026 protests and two in connection with the 2022 “Woman, Life, Freedom” protests, plus 13 political prisoners affiliated with banned opposition groups.⁴¹

^AOn August 5, 2026 the UN High Commissioner for Human Rights reported that since March 19, 2026 at least 56 people had been executed on national-security charges, 27 of them in protest-linked cases.¹¹⁹

^AIHRNGO recorded at least 532 executions of all kinds in Iran in January to August 2026, including at least 82 in August 2026; HRANA recorded at least 59 executions in September 2026. The monitors' counts are not summed.¹²⁰

On September 30, 2026, at the 63rd session of the Human Rights Council, Liechtenstein delivered a joint statement on behalf of “over 40 States” that “strongly condemn the continued and escalating use of the death penalty in Iran,” stating that at least 31 protesters had been executed.¹²¹ (The Center for Human Rights in Iran counts 46 signatory states; that figure was not verified against the official text. Whether the September 30, 2026 executions of Nikandish and Hemmati-Sistani fall within the 31 is not established.)

XI.E Amnesty International, “Architects of Atrocities”

On September 16, 2026 Amnesty International published *Architects of Atrocities* (MDE 13/1348/2026), which names 87 officials it holds responsible for crimes against humanity in the suppression of the 2022 “Woman, Life, Freedom” uprising and calls for a referral to the International Criminal Court.¹²² The report concerns 2022, not the 2026 crackdown, and is cited here for the pattern of impunity discussed in Section V.J.

XI.F US Measures: Operation Economic Outcast and Public Law 119-111

On August 24, 2026 the US Treasury launched Operation Economic Outcast, announcing nearly 60 designations (entities, individuals and vessels), new determinations under Executive Order 13902 extending sectoral sanctions to further sectors of Iran's economy, and the suspension of certain general licenses (press releases sbo613 and sbo614).¹²³ Further actions under the operation followed in September 2026, including designations of a digital-asset exchange (September 17, 2026), military procurement networks (September 29, 2026), and a October 1, 2026 determination under E.O. 13902 covering Iran's automotive and rail sectors.¹²⁴ The EU added six individuals to its Iran human-rights regime on July 24, 2026; the UK amended its Iran sanctions regulations by S.I. 2026/983 (laid 8 September, in force September 29, 2026); and Canada's further listings took effect on September 22, 2026.¹²⁵ These measures target Iran's revenue and procurement; they are not human-rights designations tied to the crackdown.

On September 18, 2026 Public Law 119-111, the Lindsey O. Graham Sanctioning Russia and Iran Act of 2026, was signed into law; among other provisions it extends the Iran Sanctions Act.¹²⁶ It is recorded here as a fact of the sanctions landscape.

XI.G Argentina's AMIA Proceedings

On September 21, 2026 an Argentine federal court ordered a trial in absentia over the 1994 bombing of the AMIA Jewish community centre in Buenos Aires, which killed 85 people, and ordered an asset freeze of up to US\$500 million per defendant. The defendants include Ahmad Vahidi, now IRGC commander-in-chief, who commanded the Quds Force at the time, and Mohsen Rezaei, now SNSC secretary.⁸⁵ Two of the officials at the top of Iran's current chain of command therefore face criminal charges abroad.

XI.H Gohardasht Prison

On Saturday October 3, 2026 the authorities demolished one of the last watchtowers at Rajaei Shahr (Gohardasht) prison in Karaj, a site of the 1988 mass executions of political prisoners, despite longstanding warnings that its destruction could erase evidence of crimes against humanity.¹²⁷ (Inference, labelled: the demolition fits the pattern of evidence destruction documented in Section V.F, and bears on the evidence-preservation mandate of the Fact-Finding Mission.)

XII. Conclusion

Between December 28, 2025 and February 2026 the Islamic Republic of Iran met an unarmed, nationwide demand for dignity with mass killing. Under a deliberately imposed communications blackout, its forces shot protesters and bystanders in the streets, on rooftops, and in their hospitals; detained tens of thousands; tortured, disappeared, and coerced; and moved to hang the survivors after summary trials. The confirmed dead number in the thousands and the credible estimates reach into the tens of thousands; the only reason the figure is contested is that the regime engineered the uncertainty.

The conduct documented here meets the established definition of crimes against humanity, and responsibility is traceable from the gunmen to the commanders, judges, ministers, and the Supreme Leader who set and executed the policy. The UN Fact-Finding Mission has now reached the same legal conclusion. Some of the men at the top have been killed in the war; the institutions they led, and the officials who succeeded them, remain in place and continue to execute protesters. That is the predicate. It is sufficient, factually and legally, to justify expanded, precisely targeted sanctions and divestment against the institutions and individuals responsible, sustained until they are held to account and the Iranian people's rights are restored. The Ledger's records translate this predicate into specific targets, limited in published form to officially designated entities.

This edition is compiled from open sources as of October 4, 2026. Casualty figures are minimums and remain subject to revision as the UN Fact-Finding Mission and human-rights monitors continue their work. Every material claim is attributed; users should rely on the primary sources cited in the endnotes and the Ledger's source register for any legal or official use.

Appendix: Online Records and Verification

The data behind this report are published on the Iran Ledger rather than as separate files: designation status across the US, EU, UK, Canada, and Australia in the Sanctions Monitor at <https://iran.meforum.org/designations>; casualty, detention, and execution figures by source and date in the evidence tables at <https://iran.meforum.org/blood-money/evidence/>; designated individuals and entities with their documented role in the Blood Money List at <https://iran.meforum.org/blood-money/list/>; and the sources relied upon in the source register at <https://iran.meforum.org/sources>.

Verification standard. The figures and attributions in this document were cross-checked across the cited sources during compilation. Where sources diverge (notably the death toll), the divergence is preserved rather than resolved; where a claim is single-sourced or contested (notably the foreign-militia allegations), it is flagged in the text. This is a deliberate methodological choice to maximise the document's defensibility in advocacy and legal settings.

Endnotes

Full citations for the numbered references in the text. Sources are limited to United Nations bodies, established human-rights monitors, official government records, and first-hand news reporting. Every note carries a URL and an access date.

1. The New York Times, citing NetBlocks and the Georgia Institute of Technology's Internet Outage Detection and Analysis (IODA) database, reported a near-total drop in Iranian connectivity on January 8, 2026; Reporters Without Borders (RSF) reported telephone lines were also cut overnight on January 8, 2026. UK Home Office, "Country bulletin Iran: protests of December 2025 to January 2026," gov.uk (period covered 28 Dec 2025–28 Jan 2026). <https://www.gov.uk/government/publications/iran-country-policy-and-information-notes/country-bulletin-iran-protests-of-december-2025-to-january-2026-accessible> (accessed October 4, 2026); <https://rsf.org/en/crackdown-iran-surge-arrests-journalists-covering-protests> (accessed October 4, 2026).

2. HRANA, “The Crimson Winter: A 50-Day Record of Iran’s 2025-2026 Nationwide Protests,” February 23, 2026, en-hrana.org. The report is approximately 1,350 pages and is derived from more than 143,330 HRANA reports collected and verified during the 50-day window. <https://www.en-hrana.org/the-crimson-winter-a-50-day-record-of-irans-2025-2026-nationwide-protests> (accessed October 4, 2026).
3. CNN, US-Iran strikes on Larak Island, August 30, 2026, <https://www.cnn.com/2026/08/30/politics/us-iran-strikes-larak-island>; The Defense Post, “US-Iran Fighting Intensifies With Strikes Across Region,” September 2, 2026, <https://thedefensepost.com/2026/09/02/us-iran-fighting-intensifies/>; Stars and Stripes, September 9, 2026, <https://www.stripes.com/theaters/middle-east/2026-09-09/iran-jordan-warship-strikes-22796749.html>. Accessed October 4, 2026.
4. Multiple sources date the outbreak of the US-Israel-Iran war to February 28, 2026, including reporting on the killing of IRGC Commander-in-Chief Mohammad Pakpour and the Iranian Defence Minister on that date (Al Arabiya, February 28, 2026; Times of Israel, February 28, 2026, reporting that Iran’s judiciary confirmed his death; Al Jazeera, March 1, 2026). Hengaw’s numbered “war reports” count casualties of this conflict separately from the protest crackdown. <https://english.alarabiya.net/News/middle-east/2026/02/28/iran-s-defense-minister-irgc-commander-killed-in-israeli-attacks-three-sources-say> (accessed October 4, 2026); https://www.timesofisrael.com/liveblog_entry/irans-judiciary-confirms-deaths-of-irgc-chief-pakpour-top-security-official-shamkhani/ (accessed October 4, 2026).
5. UNHCR, “UNHCR: 3.2 million Iranians temporarily displaced as Iran conflict intensifies,” press release attributed to Ayaki Ito and spokesperson Babar Baloch, March 12, 2026, unhcr.org. This figure is preliminary, Tehran-centric, and war-driven; UNHCR later placed the internal-displacement number “under review.” <https://www.unhcr.org/news/press-releases/unhcr-3-2-million-iranians-temporarily-displaced-iran-conflict-intensifies> (accessed October 4, 2026).
6. Payam Akhavan, civil-society representative and former prosecutor at the International Criminal Tribunal for the former Yugoslavia, statement to the UN Human Rights Council 39th Special Session, January 23, 2026: “by any plausible estimate, this was the worst mass-murder in the contemporary history of Iran ... This was an extermination.” He noted that he had helped draft the Srebrenica genocide indictment (some 8,000 killed) and that “at least twice that number had been killed in Iran in half the time.” OHCHR meeting summary, January 23, 2026. <https://www.ohchr.org/en/media-advisories/2026/01/human-rights-council-adopts-resolution-extending-mandates-fact-finding> (accessed October 4, 2026).
7. CBS News, “Mojtaba Khamenei named Iran’s new supreme leader,” March 9, 2026, <https://www.cbsnews.com/news/mojtaba-khamenei-iran-new-supreme-leader/> (“Ali Khamenei was killed on Feb. 28”); BBC News, March 8, 2026, <https://www.bbc.com/news/articles/co4326o749ko>. Accessed October 4, 2026.
8. AP, <https://apnews.com/article/iran-protests-crackdown-death-toll-acb968a973f9be217ea28b4a7adbob> (Iran’s prosecutor disputing the 800 claim); Iran Human Rights figure of at least 100 protesters sentenced to death, September 16, 2026, as reported at <https://www.chinanews.net/news/279309877/at-least-100-iran-protesters-sentenced-to-death-rights-group-says>. Accessed October 4, 2026.
9. UN Human Rights Council, Report of the Independent International Fact-Finding Mission on the Islamic Republic of Iran, A/HRC/63/61, advance unedited version dated September 14, 2026, paras. 121, 124 and 128, <https://www.ecoi.net/en/file/local/2145088/a-hrc-63-61-auf-ffmi.pdf>. Accessed October 4, 2026.
10. On the “snapback” of UN sanctions in September/October 2025 and the June 2025 Twelve-Day War as context for the economic crisis, see House of Commons Library, “Iran protests 2026: UK and international response,” CBP-10462, January 30, 2026, commonslibrary.parliament.uk. <https://commonslibrary.parliament.uk/research-briefings/cbp-10462/> (accessed October 4, 2026).
11. CNN, “Protests erupt in Iran over currency’s plunge to record low,” December 29, 2025; PBS NewsHour/AP, “Head of Iran’s Central Bank resigns amid protests as rial hits record low,” December 29, 2025; NBC News, December 2025. Figures attributed to Iran’s state statistics centre ($\approx$ 42.2% December inflation; food +72%; medical goods +50%); the rial traded around 1.42 million per US dollar, and Central Bank governor Mohammad Reza Farzin resigned. <https://www.cnn.com/2025/12/29/middleeast/iran-protests-currency-low-latam-intl> (accessed October 4, 2026); <https://www.pbs.org/newshour/world/head-of-irans-central-bank-resigns-amid-protests-as-rial-hits-record-low-against-the-dollar> (accessed October 4, 2026).
12. Amnesty International, “What happened at the protests in Iran?”, January 26, 2026, <https://www.amnesty.org/en/latest/campaigns/2026/01/what-happened-at-the-protests-in-iran/>; “The protests started with shopkeepers in Tehran’s Grand Bazaar going on strike and closing shops.” CNN, December 29, 2025, and PBS NewsHour/AP, December 29, 2025 (anti-government protests in multiple cities as the rial hit record lows; resignation of Central Bank governor Mohammad Reza Farzin). See also UK Home Office country bulletin, gov.uk.
13. HRANA, “The Crimson Winter,” February 23, 2026 (682 protest locations; 203 unique cities; 31 provinces; 55 university protests at 36 universities). On opposition figure Reza Pahlavi’s 8 January call for unified protest and the scale of the 8-9 January demonstrations, see contemporaneous reporting by Iran International and BBC News. <https://www.en-hrana.org/the-crimson-winter-a-50-day-record-of-irans-2025-2026-nationwide-protests> (accessed October 4, 2026).
14. Amnesty International, “What happened at the protests in Iran?”, January 26, 2026, <https://www.amnesty.org/en/latest/campaigns/2026/01/what-happened-at-the-protests-in-iran/> (2025 water and electricity shortages; authorities blaming “drought and overconsumption”; chronic under-investment in Kurdish and Baluchi regions). On the currency collapse and the Central Bank governor’s resignation as immediate triggers, CNN and PBS NewsHour/AP, December 29, 2025.

15. Amnesty International, January 26, 2026 (under-investment in Kurdish and Baluchi regions). Hengaw Organisation for Human Rights, reporting January–February 2026; Kurdistan Human Rights Network (KHRN) reporting (e.g., documentation of Kurdish protester deaths, February 12, 2026). <https://www.amnesty.org/en/latest/campaigns/2026/01/what-happened-at-the-protests-in-iran/> (accessed October 4, 2026).
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25. Center for Human Rights in Iran (CHRI), “Iranian Authorities Intensify Crackdown ... Attacks on Hospitals,” January 6, 2026, iranhumanrights.org (‘‘ 27 civilians killed including six children, 28 Dec–5 Jan; hundreds of children under 17 arrested; two teenage girls in Isfahan forced to confess on state media). <https://iranhumanrights.org/2026/01/iranian-authorities-intensify-crackdown-on-protests-with-live-fire-arbitrary-arrests-and-attacks-on-hospitals/> (accessed October 4, 2026).
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51. Amnesty International, “What happened at the protests in Iran?,” January 26, 2026, <https://www.amnesty.org/en/latest/campaigns/2026/01/what-happened-at-the-protests-in-iran/>. See also Al Jazeera, January 21, 2026, reporting Amnesty’s documentation of forces “firing rifles and shotguns loaded with metal pellets, often aimed at unarmed individuals’ heads and torsos.”
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- 2026 (partial restoration 26 May), and that Communications Minister Sattar Hashemi acknowledged the shutdown cost the economy about \$35.7 million per day. Reuters, May 27, 2026, <https://www.reuters.com/world/middle-east/greetings-after-88-days-iranians-reconnect-after-long-internet-shutdown-2026-05-27/> (restoration; the US\$35.7 million daily cost figure). Accessed October 4, 2026.
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