

CRIMINAL COMPLAINT

HUMAN RIGHTS ACTIVISTS IN IRAN (HRA)

V.

UNNAMED / PERSONS UNKNOWN

Concerning Alleged Crimes Against Humanity
Committed in the Islamic Republic of Iran

Submitted to the
German Federal Prosecutor General
(Generalbundesanwalt beim Bundesgerichtshof)

Request for the Opening of a Structural Investigation
under Section 7 VStGB



PUBLIC VERSION —
EXECUTIVE SUMMARY

**EXECUTIVE SUMMARY OF THE SEPTEMBER 2026 SUBMISSION TO THE
GERMAN FEDERAL PROSECUTOR GENERAL REQUESTING THE OPENING OF A
STRUCTURAL INVESTIGATION INTO THE SITUATION IN IRAN CONCERNING
ALLEGED CRIMES AGAINST HUMANITY COMMITTED BY IRANIAN STATE
AUTHORITIES, INCLUDING IN THE CONTEXT OF THE NATIONWIDE PROTESTS
BETWEEN DECEMBER 2025 AND JANUARY 2026**



Introductory Note

On September 1, 2026, Human Rights Activists in Iran (HRA), with legal support from UpRights and review by two German lawyers, submitted a request to Germany's Federal Prosecutor General to open a structural investigation into alleged crimes against humanity committed by Iranian State authorities under Section 7 of the German Code of Crimes against International Law (Völkerstrafgesetzbuch - 'VStGB'.

The nearly 109-page submission is the result of months of intensive investigation, drawing on more than 60 interviews with victims, witnesses and family members inside Iran, in Turkey and across Europe and North America, alongside extensive documentary and digital evidence and detailed analysis of weapons used and suspected perpetrators and the institutions and command structures involved. The submission also identifies 48 suspected perpetrators, mapping their roles, institutional affiliations, links to documented incidents, and positions within the command structures responsible for the crackdown.

HRA recognizes that calls for German prosecutors to investigate crimes in Iran have been made before. This submission builds on those efforts with substantial new evidence from the December 2025–January 2026 crackdown and a detailed case for why Germany is particularly well placed to act now.

What follows is a heavily redacted overview of HRA's findings, intended to provide an accessible summary of the submission.

HRA would like to acknowledge that this work would not have been possible without the extraordinary courage and trust of the victims, witnesses, family members, and experts, including those inside Iran, who shared their experiences, evidence, and expertise with HRA over the past six months.

EXECUTIVE SUMMARY

INTRODUCTION

1. On 1 September 2026, Human Rights Activists in Iran (HRA), with the legal support of UpRights, submitted a request for the opening of a structural investigation into the situation in Iran, including the recent widespread and systematic repression carried out by Iranian State authorities in the context of the nationwide protests between December 2025 and January 2026.
2. The nationwide protests in Iran between December 2025 and January 2026 began on 28 December 2025 and rapidly spread amid a severe economic crisis, the collapse of the Iranian currency, deteriorating living conditions, and governance failures. The protests started with shopkeepers and bazaar merchants in Tehran's Grand Bazaar gathering and closing their businesses. The movement rapidly evolved into a nationwide protest and spread to at least 203 cities across all 31 provinces of Iran. The protests were met with an unprecedented level of repression by State authorities. After months of investigation, information available to HRA indicates that the campaign of repression resulted in a confirmed minimum total of at least 7,068 persons killed, including 6,548 protesters, 236 children, and 77 bystanders, while at least 53,987 individuals were arrested or detained. The information contained in the submission indicates that the scale, geographical scope, and intensity of the repression carried out in response to the December 2025-January 2026 nationwide protests represent the most severe and extensive campaign of State repression directed against the Iranian population since the establishment of the Islamic Republic in 1979.
3. The information submitted by HRA is based on material collected and verified following a rigorous, victim-centered methodology developed and refined over nearly two decades of documenting serious human rights violations and potential international crimes in Iran. The submission demonstrates that there are sufficient factual indications that Iranian State authorities committed multiple criminal acts potentially amounting to crimes against humanity under Section 7 of the German Code of Crimes against International Law (Völkerstrafgesetzbuch - 'VStGB'), meeting the threshold under Section 152(2) of the German Code of Criminal Procedure (Strafprozessordnung - 'StPO') for the opening of an investigation.
4. The submission argues that the opening of a structural investigation is particularly appropriate in the context of Iran in light of the nationwide scale, magnitude and institutional nature of the alleged crimes. It would enable the German prosecution authorities to examine the broader factual and organizational structures underlying the crimes; collect and preserve testimonial, documentary and digital evidence; identify patterns across individual incidents; map the involvement of relevant State institutions and units; establish chains of command and institutional relationships; and assess the responsibility of individuals who may have planned, ordered, facilitated, contributed to or directly

perpetrated the underlying acts to enable future criminal proceedings whenever jurisdictional opportunities arise.

5. Although the submission primarily focuses on the nationwide protests and subsequent crackdown between December 2025 and January 2026, the requested structural investigation should not be confined to individual incidents or specific perpetrators. Indeed, this year's nationwide protests crackdown did not occur in isolation but formed part of a broader recurring pattern of repression by Iranian State authorities against perceived opponents and civilian protesters. Over the past two decades, Iranian State authorities have repeatedly responded to large-scale public protests with disproportionate and unlawful use of force, arbitrary arrests, mass detention, enforced disappearances, torture and other forms of ill-treatment, and other severe restrictions on fundamental freedoms. As a result, the submission argues that a structural investigation should examine the broader situation in Iran, using the December 2025-January 2026 crackdown as one evidentiary focus while enabling the German prosecution authorities to investigate recurring patterns of international crimes allegedly committed by Iranian State authorities, including those committed in the context of the 2022 "Woman, Life, Freedom" protests.
6. The existence of a sufficient nexus with Germany further justifies the opening of a structural investigation. This nexus arises from the presence and foreseeable arrival of victims, witnesses and other relevant evidence in Germany and elsewhere in Europe; the realistic prospect that suspected perpetrators may enter or transit through German territory, particularly in light of the established history of current and former Iranian officials travelling to Germany and other European States; existing proceedings concerning conduct affecting German nationals; and the increasing involvement of Iranian State actors in acts of transnational repression targeting political opponents and other perceived dissidents in Germany and elsewhere in Europe.

I. STATEMENT OF FACTS

7. ***Situation Overview: The violent repression of the December 2025-January 2026 nationwide protests.*** The most recent nationwide protests involved diverse segments of Iranian society, with protesters expressing demands extending beyond economic grievances to encompass a broader rejection of the political and governing structure as a whole. HRA registered 682 protest events, including 627 street demonstrations and 55 university assemblies. The protests were met with an unprecedented nationwide campaign of repression involving multiple State organs including the Islamic Revolutionary Guard Corps ('IRGC'), the Basij forces, the Law Enforcement Command ('FARAJA'), intelligence and security forces, and the Judiciary.
8. The response of the Iranian State authorities was characterized by the widespread use of unlawful and disproportionate force and other forms of repression against predominantly peaceful protesters, bystanders and other civilians. This involved, *inter alia*, deployment of military-grade weapons, lethal force and violent crowd dispersal tactics; mass unlawful killings; arbitrary arrests and mass detention, including incommunicado detention; enforced disappearances; torture and other forms of ill-treatment; forced confessions; restrictions on communication and access to information through the nationwide shutdown of internet, mobile and landline communications; intimidation and threats

against victims' families; raids on medical centers and restrictions on the provision of medical services; and measures aimed at concealing the scale and nature of the crimes committed. HRA documented at least 7,068 deaths, including 6,548 protesters, 236 children and 77 other civilians, as well as at least 53,987 arrests and detentions. HRA also documented 369 cases of forced confessions broadcast through State and associated media. These figures constitute verified minimums and therefore do not purport to reflect the full scale of the offenses.

9. Information collected depicts a correlation between the nationwide shutdown of internet and telecommunications services, the deliberate shutdown of public street lighting and a marked escalation in the use of lethal and other unlawful force against civilians. Across multiple locations throughout the country, HRA identified a recurring *modus operandi* in which predominantly unarmed protesters initially gathered peacefully in public spaces, including to chant slogans, sing and dance, before Iranian State authorities initiated coordinated violent crackdowns. These operations involved the use of tear gas, pellet-firing weapons, live ammunition and other forms of excessive force against protesters and bystanders. The recurrence of substantially similar methods across geographically dispersed locations involving Iranian State authorities demonstrates a coordinated pattern of conduct rather than a series of isolated incidents.
10. The coordinated and organized campaign of repression is further supported by the existence of directives and public statements issued by high-ranking Iranian government officials. On 9 January 2026, Iran's National Security Council reportedly issued instructions directing security forces to "decisively" crack down on protesters "without any restraint" and to "bring the protests to an end". Subsequently on 17 January 2026, the late Supreme Leader Ali Hosseini Khamenei publicly acknowledged that "thousands of people" had been killed, while simultaneously calling upon the authorities to "break the backs of the seditionists." These statements, when considered together with the imposition of the most extensive nationwide shutdown of internet and telecommunications services in Iran, as well as other directives and public statements by Iranian officials encouraging repressive measures against peaceful protesters and perceived dissidents, provide further indications that the digital blackout formed part of a broader State policy designed to enable and facilitate the violent crackdown while simultaneously impeding the documentation, reporting and verification of violations and thereby concealing their scale and nature.
11. Iranian State authorities mobilized extensive State resources to identify, track and arrest individuals suspected of participating and/or supporting the protests, including through the use of CCTV footage and drone surveillance. HRA documented cases where State authorities conducted raids on protesters' workplaces and family homes, carried out violent arrests at private homes and subjected family members to harassment, intimidation and other coercive methods aimed at locating or exerting pressure on the suspected protesters.
12. Those arrested in connection with the nationwide protests have also faced serious violations of their rights to a fair trial and due process, raising concerns that the Iranian State authorities are using the criminal justice system as a further instrument of repression against protesters and perceived dissidents. Detainees have reportedly been denied access to lawyers of their choosing, subjected to incommunicado detention, coerced into making confessions, and prosecuted in proceedings lacking

basic fair trial and due process guarantees. HRA documented cases involving the use of expedited judicial proceedings against protesters charged with capital offences, including *moharebeh* (“enmity against God”), *efsad-e fel-arz* (“corruption on earth”) and *baghi* (“armed rebellion”), which expose defendants to the death penalty. The combination of at least 369 coerced and televised forced confessions, restrictions on access to lawyers, accelerated proceedings and the imposition of death sentences following manifestly unfair trials raises serious concerns that the use of executions may form part of the broader campaign of repression, serving as a means of punishment, intimidation and deterrence against those participating in or supporting the protests.

13. ***Representative incidents illustrating the underlying acts constituting crimes against humanity.*** The submission contains more than 50 representative incidents illustrating detailed accounts of alleged criminal acts across different geographical locations, victim and witness profiles, methods employed by Iranian State authorities and circumstances surrounding the commission of the alleged crimes against humanity. Drawing on interviews conducted by HRA with victims, witnesses, victims’ family members and other relevant sources both inside and outside Iran, these representative incidents demonstrate not only the commission of underlying acts of crimes against humanity but also the widespread and systematic nature of the violent repression carried out by Iranian State authorities against peaceful protesters and other civilians in the context of the December 2025-January 2026 nationwide protests. The selected incidents include allegations of : unlawful killings and mass shootings of protesters and bystanders, comprising children; severe harm caused by the use of live ammunition, pellet-firing weapons, tear gas and other forms of excessive force against predominantly unarmed protesters; arbitrary arrest and detention on a mass scale; torture and other cruel, inhuman or degrading treatment in police stations, detention facilities and prisons; severe beatings, coercive interrogation and forced confessions; enforced disappearance and incommunicado detention; politically motivated persecution of protesters and persons perceived to support the protests; sexual violence and other forms of sexual abuse against women in detention; intimidation, harassment and coercion directed at victims’ families; State interference with funerals, burial arrangements and the recovery of bodies; desecration or degrading treatment of victims’ bodies including bodies piled into trucks for transport; and the imposition of death sentences following manifestly unfair trials against protesters as an additional instrument of repression. These representative incidents are non-exhaustive and constitute only a selection of the evidentiary material collected and preserved by HRA to illustrate broader patterns of criminal conduct in the context of the nationwide protests.
14. ***Identification of 48 suspected perpetrators, their roles and command structures.*** The submission also identifies 48 suspected perpetrators and analyses their positions, institutional affiliations, geographic areas of responsibility, links to specific representative incidents and roles within relevant command structures. The individuals identified are or were members of Iranian State authorities who are alleged either to have directly participated in the violent repression of the nationwide December 2025-January 2026 protests in Iran or to have planned, directed, coordinated, ordered or otherwise contributed to the commission of crimes against humanity in that context. They include commanders of the IRGC, the Basij and the FARAJA, heads of intelligence departments, governors, prison officials, and prosecution and judicial authorities. The identification of suspected perpetrators is based on information drawn from the Spreading Justice Database, the Pasdaran Documentation Project Database and other relevant HRA documentation. Depending on their respective roles and

contributions, their conduct may satisfy the requirements for mode of liability as perpetrators or joint perpetrators under Section 25 of the Strafgesetzbuch ('StGB'), as abettors under Section 26 of the StGB, as aiders under Section 27 of the StGB and/or under superior liability pursuant to Section 4 of the VStGB.

II. LEGAL QUALIFICATION: CRIMES AGAINST HUMANITY UNDER SECTION 7 OF THE VSTGB

15. The submission concludes that based on the information available, there are sufficient factual indications that multiple underlying acts of crimes against humanity, as defined under Section 7 of the VStGB, were committed by Iranian State authorities in the context of the December 2025-January 2026 nationwide protests.
16. ***Killing and causing severe physical or mental harm.*** Iranian State authorities reportedly used excessive, unlawful, and disproportionate force against peaceful protesters and bystanders, including targeted close-range shootings, "final shots" against wounded protesters in the streets and in hospitals, indiscriminate use of live ammunition, pellet rounds and irritant gas as well as physical assaults involving batons, machetes and knives.
17. ***Torture and causing severe physical or mental harm.*** Protesters and detainees were reportedly subjected to physical and psychological abuse, including harassment and beatings during arrest and detention, for purposes including intimidation, punishment and extracting forced confessions.
18. ***Severe deprivation of physical liberty.*** Iranian State authorities reportedly arbitrarily arrested and detained more than 53,987 protesters and individuals perceived to support the protests or not to conform with the political ideology of the regime, without due process or lawful basis, in violation of fundamental procedural rights.
19. ***Enforced disappearance.*** In some instances, detainees were reportedly held incommunicado in unregistered or unofficial detention facilities, denied access to lawyers and prevented from contacting their families, while authorities concealed or refused to disclose information concerning their fate or whereabouts. Similar restrictions were reportedly imposed on detainees held in official prisons and detention centres where families were also unable to obtain information concerning their arrest, detention, fate or whereabouts.
20. ***Rape and other forms of sexual violence.*** Women detained in the context of the nationwide protests were reportedly subjected to sexual assault, sexual coercion and rape while in the custody and/or control of Iranian State authorities. Documented incidents include allegations that women detainees were forced to remove all of their clothing and remain naked in the corridors of detention facilities in the presence of male detainees, who were reportedly forced by the authorities to observe, and that young women detainees were raped and sexually assaulted while in custody. These alleged acts are consistent with patterns of sexual violence previously documented by HRA in the context of the 2022 "Woman, Life, Freedom" protests and warrant particular attention in any further investigation.

21. ***Victims are being targeted because of their identity as members of a group or collectively on political grounds.*** In connection with other underlying acts of crimes against humanity above, numerous severe deprivations of fundamental rights, including the rights to life, liberty and security of person, freedom of expression, peaceful assembly and association, privacy, participation in public affairs, and freedom of religion or belief, amounting to persecution on political grounds were reportedly committed by the Iranian State authorities against individuals who participated in, supported, or were perceived to support the nationwide protests, or were perceived as not conforming with the political ideology of the regime.
22. ***Treatment of deceased victims and their families.*** Additionally, the Iranian State authorities reportedly deliberately prevented bereaved families from holding funerals or mourning ceremonies in accordance with their wishes and subjected them to restrictions concerning burial arrangements. Families seeking to retrieve the bodies of their relatives were, in several cases, subjected to intimidation, coercion and pressure by Iranian State authorities, including demands for payment as a condition for the release of bodies, attempts to bribe families to designate their deceased relatives as “martyrs” in support of the State, and pressure to consent to the identification of their deceased relatives as members of the IRGC or Basij, with the release of the body reportedly conditioned on such consent or payment. Iranian State authorities also reportedly subjected victims’ dead bodies to mutilation or other forms of desecration and degrading or improper treatment, including the collective and disrespectful handling of bodies. These acts constitute evidence of a politically motivated persecution involving violations of the right to respect for human dignity, including the rights of families to humane treatment and to mourn and bury their loved ones with dignity, and the infliction of severe psychological suffering to families of victims and affected communities.
23. ***As part of a widespread or systematic attack directed against any civilian population.*** The multiple instances of underlying acts of crimes against humanity documented appear collectively to amount to an attack. The coordinated nationwide internet and telecommunications shutdown, together with the deliberate shutdown of public street lighting during protest crackdowns, and the fact that the attack was carried out nationwide across all 31 provinces and at least 203 cities, demonstrate that these were not isolated acts.
24. The underlying acts described above were directed against a specific subset of the civilian population of Iran based on their perceived opposition to the regime, namely protesters and bystanders, thus amounting to an attack directed against a civilian population for the purposes of crimes against humanity. In the context of the December 2025-January 2026 nationwide protests, HRA documented at least 7,068 confirmed deaths, at least 53,987 arrests and detentions, and at least 369 cases of forced confessions, demonstrating the widespread nature of the attack.
25. Through the coordinated involvement of multiple Iranian State authorities, including the IRGC, Basij, FARAJA, security and intelligence forces, and the Judiciary, the attack appears to have been planned and coordinated and to have involved the substantial use of public resources, evidencing that the attack was also systematic.

26. The manner of commission, context and purpose of the crimes further demonstrate that the attack was carried out by Iranian State authorities in furtherance of or pursuant to a State policy as evidenced by directives and public statements issued by high-ranking Iranian government officials. These directives and public statements indicate awareness of, and coordination in, the repression of peaceful protesters and persons perceived as supporting the protests or dissidents, which also indicates that there are sufficient factual indications that Iranian State authorities acted with the requisite knowledge and intent. The nationwide scale, organization and systematic nature of the attack further indicate that Iranian State authorities could not have acted without knowledge of the unprecedented level of repression and the circumstances in which the underlying acts were committed.

III. THE EXISTENCE OF A SUFFICIENT NEXUS WITH GERMANY JUSTIFIES THE OPENING OF A STRUCTURAL INVESTIGATION

27. Under the VStGB, there is no legal impediment to the German Federal Prosecutor General opening a structural investigation into alleged crimes against humanity committed in the context of the nationwide protests in Iran between December 2025 and January 2026. Under the principle of mandatory prosecution, German prosecution authorities are required to investigate the multiple underlying acts potentially constituting crimes against humanity under Section 7 of the VStGB described above as it meets the threshold under Section 152(2) of the StPO for the opening of an investigation.
28. Although the German Federal Prosecutor General retains discretion to refrain from exercising jurisdiction in certain circumstances under the VStGB, the submission argues that the existence of a sufficient nexus between the alleged crimes and Germany weighs decisively in favour of opening a structural investigation in the context of Iran.
29. ***No realistic prospect of accountability in Iran or before the ICC.*** There are currently no viable domestic routes in Iran to investigate and prosecute crimes against humanity allegedly committed by Iranian State authorities. The Iranian judicial system lacks the independence and impartiality necessary to investigate the alleged crimes and instead plays a central role in the repression of protesters through facilitating arbitrary detention, unjust imprisonment, and systemic violations of fair trial and due process guarantees. Because Iran is not a State Party to the Rome Statute and has not logged a declaration accepting ICC jurisdiction, the ICC lacks jurisdiction over crimes committed in Iran absent a highly unlikely referral by the United Nations Security Council.
30. ***Realistic prospect that suspected perpetrators may enter or be present in Germany or elsewhere in Europe.*** There are concrete reasons to consider that individuals potentially responsible for crimes committed in the context of the nationwide protests may be present in Germany or other European States in the future. HRA's documentation indicates that senior current and former IRGC, government and judicial officials have travelled to Germany and elsewhere in Europe on numerous occasions, including for personal, family-related and medical reasons. These travel patterns demonstrate that the absence of an identified suspect currently on German territory does not exclude the realistic possibility that individuals allegedly responsible for the alleged crimes may enter or transit through Germany or other European jurisdictions in the future. Opening a structural

investigation would therefore ensure that the necessary evidentiary and investigative framework is already in place when potential suspects enter or transit through Germany.

31. ***Evidence available in Germany and across Europe.*** Victims, witnesses and family members of individuals killed, injured, tortured, arbitrarily detained or otherwise affected by the nationwide protests are already present in Europe and Turkey. HRA has interviewed victims and witnesses who fled Iran following the protests and are currently reaching EU countries and/or are located in countries where they can be interviewed, as well as family members of victims residing in Europe and elsewhere. As a result of continuing displacement and protection needs, the number of victims and witnesses present in Europe is likely to increase, with Germany being a principal destination for Iranian nationals seeking protection abroad. Relevant testimonial evidence is therefore already available or can readily be obtained through cooperation with European States before it is lost, compromised or becomes inaccessible. The United Nations Independent International Fact-Finding Mission on the Islamic Republic of Iran ('FFMI'), which is specifically mandated to ensure that evidence collected is accessible for use in any independent legal proceedings, can also provide additional evidentiary support to a structural investigation.
32. ***Iranian diaspora and judicial cooperation.*** Germany hosts the largest Iranian diaspora in Europe and a significant number of Iranian refugees and residence permit holders. This provides a substantial opportunity to secure testimonial, documentary, and other evidence before it is lost, or witnesses become more difficult to locate. A structural investigation could also facilitate judicial cooperation and coordinated investigative efforts with other European jurisdictions with substantial Iranian diaspora communities to support the identification and interview of victims and witnesses as well as the collection and preservation of evidence for future proceedings.
33. ***Transnational repression affecting Germany.*** Germany has been identified as a significant target of Iranian State-sponsored transnational repression. Iranian State actors, including the IRGC, the Quds Force, the Ministry of Intelligence and Security, and associated proxy networks, have been linked to surveillance, intimidation, threats, attempted abductions and assassination plots targeting individuals perceived to oppose or criticise the Iranian regime. Members of the Iranian diaspora have faced threats and intimidation on German territory, while German-Iranian dual nationals have reportedly been subjected to harassment, kidnapping, arbitrary arrest and detention, torture and other ill-treatment and, in the most extreme cases, execution in Iran. Some of the State actors implicated in the repression of the civilian population inside Iran are also linked to increased transnational activities targeting dissidents and perceived opponents abroad.
34. ***Legitimate German interest and protection of German nationals.*** Germany's position as the largest host of the Iranian diaspora in Europe, combined with its increasing exposure to Iranian intelligence activities and transnational repression, further reinforces its legitimate interest in opening a structural investigation as it would allow German authorities to holistically investigate not only the alleged crimes committed in Iran in the context of the nationwide protests but also the institutional structures and individuals responsible for related transnational repression affecting German nationals and German territory.

35. ***Existing criminal complaints concerning conduct committed in Iran against German nationals are already pending.*** The submission argues that a broader structural investigation would enable the German Federal Prosecutor General to address individual complaints while securing and preserving evidence for future cases with a sufficient nexus to Germany. Germany's structural investigations into Syria and Ukraine demonstrate that reliance on structural investigation is an effective tool for securing and preserving evidence, identifying and connecting broader patterns of criminal conduct, and facilitating long-term criminal accountability. German prosecutors have previously been requested to open a structural investigation into crimes committed in Iran. The present submission complements these efforts by providing additional factual information, identification of victims and witnesses, and identification of potential perpetrators, concerning the nationwide protests between December 2025 and January 2026, and must be assessed on the basis of the evidence and circumstances currently available.

IV. CONCLUSION

36. The submission aims to demonstrate that there are sufficient factual indications that the repression carried out by Iranian State authorities during the December 2025-January 2026 nationwide protests constitutes a widespread and systematic attack directed against the civilian population, involving multiple underlying acts potentially amounting to crimes against humanity under Section 7 of the VStGB.
37. The information documented by HRA and submitted to the German Federal Prosecutor General, including the representative incidents and the identification of suspected perpetrators, can serve as a factual basis for the German Federal Prosecutor General to open a structural investigation into the widespread and systematic repression carried out by the Iranian State authorities during the nationwide protests. Under the principle of mandatory prosecution, the submission argues that the threshold under Section 152(2) of the StPO is therefore met.
38. The existence of a sufficient nexus with Germany further supports the exercise of jurisdiction. A structural investigation would enable the collection and preservation of evidence, particularly from victims and witnesses located outside Iran, including in Europe; the identification of suspected perpetrators, their roles and relevant command structures; and the investigation of broader patterns of criminal conduct. It would also support ongoing and future proceedings concerning individuals with links to Germany. Given the nationwide scale and gravity of the alleged crimes, the absence of realistic prospects of accountability before Iranian domestic courts or the ICC, and the sufficient nexus with Germany, a structural investigation represents a necessary and effective avenue to advance accountability for the crimes against humanity in Iran.
39. In light of the foregoing, HRA respectfully requests that the German Federal Prosecutor General open a structural investigation into the alleged crimes against humanity committed in the context of the December 2025-January 2026 nationwide protests in Iran. HRA further encourages the Federal Prosecutor General to engage directly with HRA and other relevant civil society organizations that have documented these events and hold evidence potentially relevant to such an investigation. Civil society organizations have established trusted relationships with victims and witnesses, developed

substantial documentation concerning incidents and suspected perpetrators, and possess contextual and technical expertise that can support investigative efforts. HRA stands ready to cooperate with German authorities, including by facilitating access to relevant information and, where appropriate and subject to necessary safeguards and the informed consent of sources, supporting engagement with victims and witnesses. Such cooperation would enable German authorities to build upon documentation already collected while ensuring that evidence is preserved and developed in accordance with the requirements of future criminal proceedings.



HUMAN RIGHTS ACTIVISTS (IN IRAN)

