Q&A: Criminal Complaint Filed in Argentina over Crimes Against Humanity Committed by the Islamic Republic of Iran

On December 16, 2025, a group of survivors filed a criminal complaint in Argentina for crimes against humanity committed by the Islamic Republic of Iran during the Woman, Life, Freedom protests in 2022. This document addresses questions about the complaint, what comes next, and how to support accountability. This filing is a significant moment for survivors and their families in their pursuit of justice for crimes committed by the Islamic Republic of Iran.

1. What is the complaint about?

This is a complaint filed with an investigative judge in Argentina requesting that a criminal investigation be opened into crimes against humanity committed by the Islamic Republic of Iran (IRI) against the individual complainants during the brutal crackdown against Woman, Life, Freedom protests.

The Woman, Life, Freedom protests began in September 2022 following the tragic killing of Mahsa Jina Amini, a young Kurdish-Iranian woman who was arrested for allegedly defying the IRI's mandatory hijab laws and later died in the custody of the IRI's morality police. The protests first sparked in Amini's hometown Saqqez, in Iran's Kurdish region, and quickly spread to every province in Iran, with protesters demanding women's rights and a change of Iran's leadership. In response, the IRI's state security forces staged a violent crackdown by shooting live ammunition, metal pellets not intended to be shot at close range, and other projectiles at protesters. They also carried out mass arrests, arbitrary detentions, custodial torture, and ultimately even executions of protesters that continue to the present day.

This complaint states that IRI officials and security forces are responsible for the crimes against humanity of gender persecution, murder, torture, and other inhumane acts such as targeted blinding.

Beyond the direct evidence provided to support the victims' claims, the complaint also relies on the findings of the Independent International Fact-Finding Mission on the Islamic Republic of Iran (FFMI, or UN Fact-Finding Mission on Iran), an investigative body established by the United Nations Human Rights Council in November 2022. In its March 2024 report and subsequent reports, the FFMI found that the IRI was responsible for various crimes against humanity as defined under international criminal law, including "murder, imprisonment, torture, rape and other forms of sexual violence, persecution, enforced disappearance and other inhumane acts." The FFMI's findings have played a crucial role in helping survivors obtain international protection, including humanitarian visas and other benefits. Many of these survivors have continued to speak out on the crimes committed by the IRI after being forced to flee their homes.

2. Who are the complainants?

A group of Iranian women have filed this complaint, together with an independent non-profit organization. These women or their family members are the direct victims of crimes against humanity committed by the Islamic Republic.

The complainants who can be publicly identified include **Kosar Eftekhari** and **Mersedeh Shahinkar**, who were both shot and blinded in the right eye at close range by IRI security forces, and **Mahsa Piraei**, whose mother **Minoo Majidi** was shot and killed with hundreds of metal pellets by IRI state security forces.

Kosar Eftekhari was 23 years old during the Woman, Life, Freedom protests when she was shot in the right eye by Islamic Republic of Iran security forces. A university student who loved the theater, she joined the protests after being enraged by the authorities' false claims about Mahsa Jina Amini's death, particularly given her own prior detention and beating by morality patrol officers. After weeks of protesting and witnessing widespread violence against demonstrators, Eftekhari was at a protest on October 12, 2022 when a plainclothes officer fired multiple times at her from close range and threatened to shoot her in the eye if she did not leave. As she attempted to help other protesters being detained, the same officer shot her in the face, causing catastrophic injury to her right eye and a loss of vision. Her account is corroborated by, among others, a video that circulated widely on social media showing her bleeding from the eye. Despite initial difficulty accessing transportation, she eventually reached a hospital for treatment, but did not regain vision in her injured eye. She later fled Iran and now lives in exile in Germany.

Mersedeh Shahinkar was 38 years old and living in Tehran with her young daughter when she was shot in the right eye by Islamic Republic of Iran security forces during the Woman, Life, Freedom protests. Compelled to protest after the killing of Mahsa Jina Amini, she witnessed widespread violence against demonstrators, including beatings, the use of tear gas near a girls' primary school, and the firing of projectiles at protesters. On October 15, 2022, while attending a protest in her neighborhood, Shahinkar was surrounded by officers, including plainclothes agents, who began firing at women protesters. She collapsed and later realized she had been shot in the right eye. Despite the severity of her injuries, Shahinkar was initially denied medical care at a clinic that refused to treat protesters. Even after undergoing painful eye surgeries, she continued to protest and publicly shared images of her injured eye, which went viral and encouraged others to speak out. After street protests subsided in early 2023, plainclothes agents raided her home, forcing her to flee Iran. She now lives in exile.

Minoo Majidi, the 62-year-old mother of Mahsa Piraei, was killed on September 20, 2022, in the early days of the Woman, Life, Freedom protests. A Kurdish woman living in Kermanshah, Majidi was deeply shaken by the killing of Mahsa Jina Amini and insisted on joining the demonstrations, telling her husband that older generations had a responsibility to stand in solidarity with the youth. Neither believed that IRI security forces would open fire on protesters. Piraei, who was living in the UK at the time, learned that her mother had been shot and killed by IRI forces simply for protesting and returned to Iran immediately, despite warnings that she risked arrest. An autopsy revealed that Majidi had been struck by metal pellets, a weapon not designed for close-range use. In the days following her death, security agents surrounded the family home and documented attendees at Majidi's funeral. A political activist who spoke at her graveside was later arrested and sentenced to one year in prison. Piraei reports that her father and maternal uncle were subsequently subjected to repeated harassment and threats to remain silent. Seven days after Majidi's burial, her younger daughter, Roya Piraei, posted a photo on a private social media account standing at her

mother's grave. In the photo, Roya is clutching the hair she shaved off her own head in protest. The image was shared widely, went viral, and ultimately forced Roya to flee Iran for her safety.

The IRI killed hundreds of protesters and injured thousands more during the height of the protests. According to the FFMI, the IRI's security forces engaged in a pattern of lethal force against protesters, and women and men were injured in similar numbers. The victims who filed this complaint are emblematic of different categories of crimes committed against protesters—including intentional blinding, injury from shots of live ammunition, and death by shooting by projectiles at close range.

The filing organization is the **Iran Human Rights Documentation Center (IHRDC)**, an independent non-profit organization founded in 2004 by human rights scholars and lawyers dedicated to the promotion of accountability, respect for human rights, and the rule of law in Iran. IHRDC has an extensive track record of documenting human rights violations and atrocity crimes committed by the IRI. The Strategic Litigation Project at the Atlantic Council also provided support in filing this complaint.

3. Why is the complaint being filed?

This is the first complaint filed anywhere in the world by victims of crimes against humanity committed by the IRI in the context of the Woman, Life, Freedom movement. The goal of the complainants in bringing this complaint is to get truth, justice and accountability for the crimes committed against them by the IRI in its brutal repression of the Woman, Life, Freedom movement. This is a request for the opening of a criminal investigation to assess the individual criminal responsibility of the perpetrators involved. The complainants seek concrete action against the regime for the atrocities committed against them and other civilian protesters, as well as the opportunity to present their testimony before a court of law in order to challenge and counter the propaganda advanced by the regime and its supporters. In sharing their stories, the complainants also wish to honor the courage of those inside Iran who assisted them and who continue to speak out against repression, often at great personal risk.

The types of abuses alleged by the complainants were identified by the UN Fact-Finding Mission on Iran as serious human rights violations amounting to crimes against humanity. These crimes, including murder, imprisonment, torture, rape and other forms of sexual violence, persecution, enforced disappearance and other inhumane acts, were committed as part of a widespread and systematic attack direct against a civilian population, primarily targeting women, girls, and other civilians expressing support for human rights. Because the crimes are carried out with a discriminatory intent against women and girls, and those expressing support, the mission also concluded that crimes against humanity of persecution on the grounds of gender were also committed.

The complaint is being filed under the principle of universal jurisdiction, which provides that the domestic courts of a country can investigate and prosecute certain grave crimes under international law regardless of where the crimes were committed and irrespective of the nationality of the victims or the alleged perpetrators. Universal jurisdiction enables third states to intervene and hold

perpetrators of international crimes accountable when justice is unavailable in the territory where the crimes occurred—such as in Iran—thereby helping to end global impunity for atrocity crimes.

Using this principle, in 2024 alone, courts in different countries secured 27 convictions and opened at least 36 new cases. Investigations and prosecutions addressed crimes committed in 32 countries, with cases pursued in 16 different jurisdictions. Of particular relevance to the context of Iran, in the summer of 2025 French magistrates issued an arrest warrant against former Syrian president Bashar al-Assad for complicity in war crimes and attacks against civilians in relation to chemical attacks in the Syrian cities of Adra and Douma. The warrant replaced an earlier one issued while al-Assad was still in office, which France's highest court had annulled on grounds of head-of-state immunity. The new warrant is the third issued by French magistrates against al-Assad, following one issued against him in January 2025 for complicity in war crimes over a bombing in Deraa in 2017 and one issued in August for a 2012 bombing of a press center. These developments underscore that progress in international justice continues—and that even senior officials of the Islamic Republic of Iran are not beyond the reach of accountability.

4. Why is the complaint being filed in Argentina?

The FFMI made clear to the rest of the world what Iranian victims and survivors have been saying all along: there is no viable avenue for accountability domestically in Iran, where the IRI enjoys complete <u>impunity</u> for its crimes. The FFMI encouraged other states with universal or extraterritorial jurisdiction frameworks, that is, where certain international crimes can be prosecuted regardless of where they were committed or by whom, to open investigations into IRI repression during the Woman, Life, Freedom movement.

Argentina's Constitution (art. 118) and Law 26.200 allow federal Argentine courts to investigate and prosecute core international crimes like genocide, crimes against humanity, war crimes and others enumerated in the Rome Statute of the International Criminal Court. Further, Argentina does not require the physical presence of the alleged perpetrators in its territory before an investigation can begin. This means that crimes against humanity committed by the IRI inside Iran against Iranian victims can be investigated and prosecuted by a federal court in Argentina. Similar complaints have been filed in Argentina regarding crimes against humanity in Venezuela, genocide against the Rohingya by Myanmar authorities, and crimes against humanity committed under the Franco regime in Spain.

5. Who are the accused perpetrators?

The initial complaint calls on the Argentine court to investigate senior officials within the IRI's intelligence services, military, police, and the Islamic Revolutionary Guard Corps (IRGC), as well as civilian government officials, for their roles in the widespread and systematic attack against civilians in the context of the Woman, Life, Freedom movement. In its <u>public report</u>, the UN Fact-Finding Mission on Iran identified multiple state and security entities as responsible for unlawful killings and crimes against humanity committed during the protests, and documented both the identities of direct perpetrators and the chains of command linking them to senior officials.

6. Have there been similar cases in the past? What was the result?

The tool of universal jurisdiction has previously been applied to crimes committed in Iran, but not involving the crimes committed during the Woman, Life, Freedom protests. In July 2022, a Swedish district court convicted former Iranian official Hamid Noury of grave breaches of international humanitarian law and murder for mass executions in Iran in 1988. Both the Swedish prosecutor and Noury appealed the verdict, but the appeals court upheld the initial conviction almost in its entirety in December 2023. While six months later, Swedish authorities approved a hostage exchange that Noury over to the IRI in exchange for two Swedish citizens that had been held hostage in Iran, the trial in Sweden remains a significant historical event that provides an authoritative record from an independent court of the 1988 executions and the crimes committed in that context.

While this complaint is the first of its kind, it would not be the first case against IRI officials brought in Argentina. In June 2025, an Argentine judge <u>ordered</u> that in absentia trials begin against seven Iranian suspects, along with three Lebanese individuals, for the 1994 bombing of a Jewish community center in Buenos Aires in which 85 people were killed and hundreds wounded. This case is referred to as the AMIA bombing, using the center's acronym in Spanish. In 2024, Argentina's Court of Cassation found the Islamic Republic of Iran <u>responsible</u> for orchestrating the attack and Hezbollah for carrying it out. The ruling further classified this attack as a crime against humanity, marking an important precedent. The Iranian suspects are former and current IRI officials: Ali Fallahian, former minister of Intelligence and Security (MOIS); Ali Akbar Velayati, former Foreign Minister; Mohsen Rezai, former commander of the Islamic Revolutionary Guards Corps (IRGC); Ahmad Vahidi, former Interior Minister, former commander of the IRGC's Quds force, and named Deputy Chief of the General Staff of the Armed Forces since October 30, 2025; Hade Soleimanpour, former Iranian ambassador to Argentina; Ahmad Reza Asghari, former secretary at the Iranian embassy in Argentina; and Mohsen Rabbani, former Cultural Attaché at the Iranian embassy in Argentina.

This complaint would be the first universal jurisdiction case in Argentina over crimes committed in Iran if an investigation is opened. It would join <u>several other cases</u> opened in Argentina involving international crimes committed in other countries. Recent cases include the opening of an investigation into former state counsellor Aung San Suu Kyi and other Myanmar officials for genocide and crimes against humanity committed against the Rohingya; the opening of an investigation and arrest warrants issued against co-Presidents of Nicaragua, Daniel Ortega and Rosario Murillo, and several other high-ranking officials for crimes against humanity committed since 2018, including violence against protesters; and the opening of an investigation and arrest warrants issued against Venezuela's Nicolás Maduro, and over 30 Venezuelan officials for crimes against humanity committed in the context of widespread repression in the country.

7. How can the international community support Iranian victims and survivors?

Iranian victims and survivors have been demanding accountability for the crimes committed by the IRI for decades. Absent of any effective remedy within Iran, it is crucial that the international community amplify their voices, their stories, and their calls for justice. Simply deporting former IRI officials back to Iran does not further the pursuit of justice since they will not face accountability in national courts in Iran. In addition to sharing their stories and opening investigations into crimes committed against them, Iranian victims and survivors need support for dealing with the aftermath, such as medical treatment for injuries and psychosocial support. They also often need assistance in immigration and administrative processes in their new home countries. Investigations and dealing with the physical and emotional aftermath of crimes takes many years. The international community must not forget what happened to these brave individuals and continue to assist them as they pursue justice and rebuild their lives.