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Vidarebefordrat brev:

Från: Rebecca Mooney <rebecca.mooney@mccue-law.com>
Datum: 4 november 2019 18:52:22 CET
Till: Göran Hjalmarsson <goran@advguide.se>
Kopia: Matthew Jury <matthew.jury@mccue-law.com>, kaveh moussavi <kavehmoussavi@icloud.com>
Ämne: Strictly confidential

Dear Göran

As discussed this afternoon, we have amended the Representations to take account of your feedback this afternoon.

I now attach the finalised Representations, Bundle A/A1, a file labelled Bundle C (images), and final approved versions of the Witness Statements for A, C and E, for onward transmission by you to the WCU.

We are informed by Witness A that he has numerous contacts in Sweden and other jurisdictions who are willing to assist with any inquiry and can give evidence on ID and on the events that are the subject of the Representation.

I will, separately, send you contact details for witnesses A, C and E, and also for our source, who we are calling Witness B. All are very willing to cooperate, but of course are anxious to obtain your advice on confidentiality and, where appropriate, witness protection.

We should be grateful if you could forthwith transmit the attached documents to Mrs Patricia Rakic Arle, the Chief of the War Crimes Investigation Group.

With best regards

Rebecca

Rebecca Mooney
Consultant Solicitor

McCUE & PARTNERS

Strictly confidential

Urgent Representations and Requests to the Swedish Police War Crimes Investigation Group

To: registrator.kansli@polisen.se

Date: 4 November 2019

Re: Gruppen för utredning av krigsbrott (War Crimes Investigation Group)

Dear Sirs

We act for Mr Kaveh Moussavi, a British citizen of Iranian origin, who is an expert on Iran, and, in particular, on its gross violations of human rights over recent decades.

We are writing to you to make urgent representations for the purpose of causing you to commence an investigation into serious and supported allegations of war crimes, genocide and crimes against humanity committed by an Iranian national who, we understand based on knowledge and belief, will be entering Sweden on 8 November.

Annexed hereto is a bundle of open source background material titled Bundle A and to which reference is made throughout this document [A pp].

Annexed hereto also are a bundle of witness statements from eye-witnesses and direct victims of the suspect's alleged offences and to which reference is made throughout this document [Statement of Witness X pp]. Two of these witnesses are citizens of, and resident in, Sweden. The third witness is a citizen of, and resident in, the UK.

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On the basis of information provided to us, we believe that there are numerous other victims, in Sweden and other jurisdictions, who are willing to provide witness evidence and to assist with investigations by the Swedish War Crimes Investigation Group.

We should be grateful for your immediate confirmation of receipt of these materials, that their contents will be treated as strictly confidential and of your intention to open an investigation for the purposes of establishing whether the suspect can be lawfully arrested and detained upon entry in Sweden on 8 November.

We are available to provide any and all possible cooperation.

Sincerely

Matthew Jury, Managing Partner, *McCue and Partners*
Rebecca Mooney, Consultant, *McCue and Partners*

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I. Summary

1. We have received information that Iranian national, Hamid NOURY, a suspect in the 1988 Iranian 'Prison Massacres', in which thousands of so-called 'apostates' and opponents to the Iranian regime were tortured and summarily executed, shall be travelling to and entering Sweden on 8 or 9 November 2019.
2. Information regarding the point and time of his arrival and accommodation in Sweden can be provided.

II. Background: The 1988 Iranian Prison Massacres¹

3. The Prison Massacres took place in the context of the Iran-Iraq war. Iraq invaded Iran in September 1980. The subsequent Iran-Iraq war was the subject of several UN Security Council (UNSC) resolutions calling for an immediate cease-fire.² On 20 July 1987, after recalling Resolutions 582 and 588, the UNSC unanimously adopted Resolution 598. Resolution 598 called for an immediate ceasefire between Iran and Iraq, the repatriation of prisoners-of-war, and for both sides to withdraw to the international border. Until July 1988, Iran rejected all these UNSC resolutions. On 20 July 1988, Ayatollah KHOMEINI reluctantly accepted Resolution 598. The ceasefire under Resolution 598 was due to come into effect on 8 August 1988.
4. Only a matter of days after KHOMEINI'S reluctant acceptance of the cease-fire, on 25 July 1988 an armed faction of the leftist dissident political organisation *Mojahedin Khalq Organisation* (MKO) launched an attack from Iraq into Iranian territory. Some MKO had taken refuge in Iraq, and had been subsumed into the Iraqi war effort. The invasion became

¹ This report draws extensively on 'The Massacre of Political Prisoners in Iran, 1988', Report of an Inquiry conducted by Geoffrey Robertson QC. The full report is at **[A60–201]**.

² UN Security Council, *Security Council resolution 582 (1986) [Iraq-Islamic Republic of Iran]*, 24 February 1986, S/RES/582 (1986); UN Security Council, *Security Council resolution 588 (1986) [Iraq-Islamic Republic of Iran]*, 8 October 1986, S/RES/588 (1986); UN Security Council, *Security Council resolution 598 (1987) [Iraq-Islamic Republic of Iran]*, 20 July 1987, S/RES/598 (1987).

known to the Mujahedeen as the 'Eternal Light Invasion'. However, the Iranian Regime called it Operation Mersad, which means 'Operation Trap', thus portraying the incursion as a deliberate entrapment of MKO forces by the Regime. In putting down the invasion, the Iranian forces obliterated all MKO members involved in the Eternal Light Invasion and set about executing the remainder already in detention in Iranian prisons.

5. What became known as the 'Death Fatwa' was issued by KHOMEINI on or about 28 July 1988. The Fatwa ordered the execution of all MKO prisoners who remained 'steadfast' to their cause. As described in further detail below, it was in the immediate aftermath of these events that MKO and other political prisoners were massacred in their thousands in Evin, Gohardasht, and other Iranian prisons.
6. In 1986, the United Nations appointed El Salvadoran law professor and diplomat, Reynaldo Galindo POHL, as its Special Representative to report regularly upon the situation in Iran, with particular concern to investigate the credible reports of executions and torture of political prisoners and the brutal repression of those who followed the Baha'i faith.
7. POHL's first report, in 1987, confirmed the widespread use by Iran of bastinado and other torture techniques on political prisoners (medical examinations of escaped and released political prisoners had put this beyond doubt). **[A69.]**
8. In 1988, a so-called 'Pardon Committee' visited Iranian political prisoners ostensibly to determine who was fit for early release. They would review personal files and interrogate each convict to "*make sure that he has changed and is expressing regret and has genuinely become a supporter of the position of the Islamic Republic*". The Committee would draw-up a list to be submitted to Ayatollah MONTAZERI who would decide whether those had previously displayed "tendencies to apostasy" would, if in his determination they presented no danger to be public, be pardoned or have their sentences reduced. Political prisoners who had not repented -- known as Mellikesh -- were to continue to be detained indefinitely. As a result of the Pardon Committees review, the prisons were able to segregate the

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Mellikesh from 'repenters' and from members of the MKO (who were assigned their own wards). **[A95]**. The Pardon Committees have been said to have been the predecessors to the Death Committee in that their bureaucratic classifications of political prisoners into Mellikesh, Repenters, and MKO, facilitated their successor's work. **[A95-96.]**

9. As noted above, on 20 July 1988 Ayatollah KHOMEINI, the Supreme Leader of Iran, accepted a UN ceasefire in Iran-Iraq War (1980-1988). One week later a small force from the MKO coordinated with Iraqi armed forces to mount the 'Eternal Light Invasion' cross-over the border from Iraq into Iran. The Iraqi armed forces provided the MKO with air-cover.
10. On about 28 July 1988, KHOMEINI issued a fatwa ordering a death-sentence for all imprisoned MKO members, most of them detained since 1981 merely for taking part in street protests or possession of 'political' reading material. This order was put into immediate operation through a three-man 'Death Committee' who confirmed the identity and "steadfastness" of MKO prisoners prior to sending them for execution. **[A67/177.]** This is confirmed by KHOMEINI in his own memoirs. **[A73.]**
11. After an initial success, the 'Eternal Light Invasion' by the MKO was defeated and pushed back by Iranian armed forces on 29 July 1988. **[A177.]**
12. The Death Committee comprised of a religious judge, Hossein Ali NAYYERI (sometimes replaced by his Deputy, Ebrahim RAISI and later promoted to Iran's Deputy Chief Justice), a public prosecutor, Morteza ESHRAQI (now a Supreme Court Judge), and an intelligence chief, a role usually taken by the Deputy Minister of Intelligence, Mostafa POURMOHAMMADI (later Interior Affairs Minister in Mahmoud AHMADINEHAD's first Cabinet). **[A73/108.]** They commenced operations immediately in both Evin and Gohardasht prisons with the assistance of their deputies and other staff. **[A108.]**

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13. Brought before the Death Committee was every prisoner who had been jailed for adherence to the MKO. **[A67.]** Each prisoner would be interrogated. Those who by their answers indicated any continuing affiliation with the MKO were blindfolded and ordered to join a line leading to gallows. They were hung from cranes, four at a time, or in groups of six, from ropes hanging from the front of the stage in an assembly hall. (Hanging in Iran is traditionally carried out by “stringing up” rather than “the drop” down a trap door: strangulation takes more time and consciousness remains for longer. **[A111].**) Executions in Evin and Gohardasht prisons were by hanging, although for women in provincial prisons (especially those near the battle zones) firing squads were used. **[A124.]** The prisoners’ bodies were doused with disinfectant, packed in refrigerated trucks and, as people witnessed, buried by night in mass graves.³ **[A67/70.]** (The first burial place to be identified was at Behesht-e Zahra cemetery in Tehran. The UN Special Rapporteur on Human Rights in Iran reported that he had been reliably informed that 860 bodies had been taken there between 14 and 16 August 1988. **[A143.]**)
14. By mid-August, MONTAZERI estimated that between 2,800 and 3,800 MKO prisoners had been executed⁴, an estimate corroborated much later by the Mojahedin when it issued a list of 3,208 members identified as having been killed.⁵ **[A113.]** These killings became known as the ‘First Wave’.
15. On 5 August 1988, the Chief Justice of Iran, Ayatollah Mousavi ARDEBILI, had announced that the judiciary was under pressure from public opinion to execute all members of the MKO without exception and without trial, and had added a threat that more members of that organisation and “other groups” of oppositionists would be executed.⁶ **[A70.]**

³ Reynaldo Galindo Pohl, *Report on the situation of human rights in the Islamic Republic of Iran*, E/CN.4/1989/26, 26 January 1989, paras 15-18.

⁴ Ayatollah Hossein Ali Montazeri, *The Diaries* (Ketab Corporation, 2001), 357

⁵ NCRI, *The Massacre of Political Prisoners*, (1999). In 2001 in its publication, *Crime Against Humanity*, the National Council of Resistance estimated 30,000 deaths nation-wide. It is noted that Geoffrey Robertson QC, in his report on the Prison Massacres, expressed his opinion that “this figure is not convincingly explained and seems to me to be highly exaggerated” **[A198.]**

⁶ Reported in Kayhan, 6 August 1988, 15.

16. On or around 4 August 1988, MONTAZERI wrote letters to KHOMEINI criticising the mass executions. From these letters, POHL concluded that *“that there was awareness at the highest level of the government that ‘thousands’ of summary executions were taking place without regard to constitutional and judicial procedures”* and surmised that *“the massacre of political prisoners was a pre-meditated and co-ordinated policy, which must have been authorised at the highest level of government.”*⁷ **[A75.]** (In 2000, the ‘MONTAZERI Letters’ appeared in ‘The Diaries of Ayatollah Montazeri’, which had been compiled and published by his students. **[A73.]**)
17. On 8 August 1988, the cease-fire under UN Security Council Resolution 598 came into effect.
18. On 26 August 1988 there was a ‘Second Wave’ of extra-judicial ‘trials’ torture and/or killings of all ‘leftist’ prisoners whose ideology was regarded as incompatible with the theocratic state of Iran and were accused of the religious crime of apostasy. These groups included the communist *Tudeh Party*, aligned with Moscow, the Marxist-Leninist *Fadaiyan Khalq Organisation (FKO)* (which had split into majority and minority factions), *Peykar* (orthodox Marxist-Leninist), and various other smaller leftist groups. Those summoned before the Death Committee were asked whether they were Muslim, whether they believed in God, whether and how often they prayed and whether they were prepared to start praying again. **[A128.]**
19. Those men who were judged to be an ‘innate apostate’ (i.e. one born into a Muslim family who declined to say Islamic prayers or were deemed to be insincere in offering to do so) were sent for execution. Female non-believers who did not come from a devout Muslim family were tortured. Male non-believers who did not come from a devout Muslim family were tortured more severely. Both men and women were ordered to be whipped five times a day all over their body until they agreed to pray; some died from the lash. **[A67-68/177/128-129.]**

⁷ Reynaldo Galindo Pohl, 8 November 1993, para 25.

20. On 24 August and 14 September 1988, The UN Special Rapporteur on Summary Executions telegraphed the Iranian Minister for Foreign Affairs to the effect that Iran was breaching Article 14 of the International Covenant on Civil and Political Rights by executing prisoners after “*extremely summary, informal and irregular proceedings, failure to inform defendants of specific accusations against them, lack of legal counsel, absence of an appropriate instance of appeal and irregularities that contravene international standards on fair trial.*”⁸ [A70.]
21. On 13 October 1988, POHL submitted an interim report to the UNGA in which he set out information that “*a large number of prisoners, members of opposition groups, were executed during the months of July, August and early September*”.⁹ [A70.]
22. By mid-November 1988, the prison massacres stopped. At that time, relatives of the executed prisoners began to be notified, in a slow and bureaucratic way, of the fact of a child or spouse’s death. They were refused any information about the location of the deceased’s grave and were ordered not to mourn in public. [A177.]
23. On 8 December 1988, further to POHL’s interim report, the UN General Assembly adopted a resolution, expressing deep and grave concerns “about the numerous and detailed allegations of grave human rights violations in the Islamic Republic of Irannamely, those related to the right to life, the right to freedom from torture or cruel, inhuman or degrading treatment or punishment, the right to liberty and security of person, the right to a fair trial and the right to freedom of thought, conscience and religion”, and about the “renewed wave of executions in the period July–September 1988 whereby a large number of prisoners died

⁸ Reynaldo Galindo Pohl, Interim 1988 Report, paras 69 and 71.

⁹ Reynaldo Galindo Pohl, Interim 1988 Report, para 47.

because of their political convictions", further to "extremely summary, informal and irregular proceedings".¹⁰

24. In January 1989 POHL submitted a further report appending a list of names of over 1,000 murdered prisoners. He noted that his sources indicated that several thousand prisoners had been murdered; mostly members of the MKO but also from other left-wing groups. **[A70.]**

III. The Role of Hamid Noury

25. Hamid NOURY (aka Hamid Nouri Abbasi) was an assistant and "right-hand man" to NASERIAN (real name Mohammed MOGHISEI), the Governor at Gohardasht Prison (now head of Branch 28 of the Revolutionary Courts in Tehran) and an Assistant Prosecutor ('Dadyar') to the Death Committee. **[A180/181/273; Statement of Witness A ¶3.3/3.5; Statement of Witness E ¶3.3.]** NOURY was also given the role of Dadyar at Gohardasht Prison. **[Statement of Witness C ¶3.10; Statement of Witness E ¶3.1.]**
26. Witnesses, former prisoners at Gohardasht Prison, testify that:
- 26.1. NOURY was directly and extensively involved, as a key perpetrator of the organised murders in Gohardasht Prison. **[Statement of Witness A ¶3.1]**
- 26.2. NASSERIAN and NOURY were in operational and executive control of the prison massacres at Gohardasht Prison. **[Statement of Witness A ¶3.7/4.10; Statement of Witness C ¶1.4.]**
- 26.3. NASERIAN acted as a "processing agent for the Death Committee" who would force prisoners to sign statements condemning themselves before appearing before the

¹⁰ UN General Assembly, *Situation of human rights in the Islamic Republic of Iran: resolution / adopted by the General Assembly*, 8 December 1988, A/RES/43/137.

Death Committee. **[A30; Statement of Witness A ¶4.12.]** NASERIAN, NOURY (ABBASI) and Davoud LASHGARI (real name Taghi ADELI), head of security at Gohardasht Prison, were responsible for classifying and prioritising hundreds of prisoners whose political convictions would lead to their execution before bringing them before the Death Committee. **[A33; Statement of Witness A ¶3.7/4.4.]**

- 26.4. NOURY would read out the names of the prisoners to be executed, line them up and escort them to the execution chamber. **[Statement of Witness A ¶4.6/4.13-4.14; Statement of Witness E ¶4.4/4.9.]**
- 26.5. NASSERIAN, NOURY and LASHGARI would testify before the Death Committee against individual prisoners to ensure they would be condemned and executed. **[Statement of Witness A ¶4.3.]**
- 26.6. NASSERIAN and NOURY would torture and beat prisoners. **[Statement of Witness A ¶3.6-3.7.]** NASERIAN would kick and beat prisoners waiting in the corridor waiting to be brought before the Death Committee (the 'Death Corridor'). **[A53-54/57.]** LASHGARI would also beat prisoners and told them they "break hands, dislocate shoulders, smash bones, blind eyes and break ribs ... we can punish you to the point of death". **[Statement of A ¶3.2; A2/13.]** NOURY whipped prisoners on the orders of the Death Committee. **[Statement of Witness A ¶4.28.]** They also oversaw violent beatings and torture carried out by the prison's guards with cables, rods, sticks, fists, boots and shoes. **[Statement of Witness C ¶3.19-20.]** NASSERIAN and NOURY would watch beatings from their office windows which overlooked the prison yard. LASHGARI would watch from the roof and from the yard. **[Statement of Witness C ¶3.21.]** Prisoners would regularly be thrown into an airless room, 60-100 at a time, known as the 'gas-chamber', covering and closing off the doors and windows with blankets, with outside temperatures at 40 degrees Celsius. They would be kept in there for half-an-hour at a time and then brought out and placed in front of a cooling system. **[Statement of Witness C ¶3.24.]**

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- 26.7. NASERIAN would take delight in explain to prisoners the hanging process in detail; describing how instant damage to the spinal cord resulted in the intestines rupturing and the prisoner defecating. He told them “we will sink you in the sewer”. **[A42; Statement of Witness A ¶4.26]** Once a prisoner’s execution had been issued, NASERIAN would mock the prisoner by telling him “*your visa has been issued*”. **[A46; Statement of Witness A ¶4.13.]**
- 26.8. NOURY would tell prisoners that he would be the one to kick them off the stool when the rope was hung around their necks. **[Statement of Witness A ¶4.26.]**
- 26.9. LASHGARI was seen pushing a wheelbarrow full of ropes to the execution chamber at Gohardasht Prison. **[A23.]**
- 26.10. It was the standard practice of the Death Committee after executing a group of prisoners to celebrate by serving cakes and sweets amongst themselves. Shortly after each series of executions, NOURY (Abbasi) came to the Death Corridor holding a box of cakes to celebrate the executions and offering pieces the prisoners¹¹. By doing so, the Death Committee were taunting the prisoners to completely destroy their spirits. None of the inmates took any cake. **[A32; Statement of Witness A ¶4.15/4.29.]**
- 26.11. NOURY would sprint along the Death Corridor, dragging his pen along the radiators to make noise and tormenting the prisoners by repeating “Mojahedin’s continuous Ashoora” (Ashoora is a major holiday in Islam) in celebration of their executions. **[A33; Statement of Witness A ¶4.25.]**

¹¹ Naserian’s deputy. His real name is Hamid Nouri. See Mesdaghi I. (2005). *Ravayat-e Iraj Mesdaghi az Siyachtarin Daheh Omr-e Jomhuri-e Eslami*. [online] Available at: <http://www.pezhvakeiran.com/maghaleh-71930.html> [Accessed 11 Jun 2019]

- 26.12. Witness A testifies seeing/hearing that NAYERI sentenced a prisoner to 100 lashes for lying with NOURY volunteering to administer the flogging. **[A47; Statement of Witness A ¶4.28.]**
- 26.13. NASERIAN and LASHKARI would send prisoners they disliked to the front of the line in the Death Corridor. **[A728.]**
- 26.14. NASERIAN and LASHGARI were seen, wearing gas masks, organising the disinfecting of the site where the executed prisoners' bodies were loaded onto a trailer to be taken away. **[A53.]**
- 26.15. NASERIAN carried out the hanging of prisoners himself. **[A180.]**

IV. Other Materials

27. The following UN materials address the armed conflict, and the human rights situation in Iran, during the relevant period:
- 27.1. UN Security Council, Security Council resolution 582 (1986) [Iraq-Islamic Republic of Iran], 24 February 1986, S/RES/582 (1986)
- 27.2. UN Security Council, Security Council resolution 588 (1986) [Iraq-Islamic Republic of Iran], 8 October 1986, S/RES/588 (1986)
- 27.3. UN Security Council, Security Council resolution 598 (1987) [Iraq-Islamic Republic of Iran], 20 July 1987, S/RES/598 (1987)
- 27.4. UN General Assembly, Report of the Economic and Social Council, Situation of human rights in the Islamic Republic of Iran: Note by the Secretary General, 13 October 1988, A/43/705 (transmitting POHL's interim report).

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- 27.5. UN General Assembly, *Situation of human rights in the Islamic Republic of Iran : resolution / adopted by the General Assembly, 8 December 1988, A/RES/43/137*
- 27.6. UN General Assembly, Economic and Social Council, Report on the human rights situation in the Islamic Republic of Iran by the Special Representative of the Commission on Human Rights; Mr Reynaldo-Galindo Pohl pursuant to Commission resolution 1988/69, 26
- 27.7. UN Commission on Human Rights, *Situation of human rights in the Islamic Republic of Iran, 8 March 1989, E/CN.4/RES/1989/66*

V. Alleged Offences

28. Based on the witness testimony provided and various reports and other open source materials, there would appear to be a strong *prima facie* case against NOURY for war crimes, and the international crimes of, *inter alia*, extrajudicial killing, mass murder, torture (amounting to a crime against humanity due to its widespread and systematic application) and genocide for his alleged role, both direct and as an accomplice, in the torture and execution of hundreds of prisoners at Gohardasht Prison during the First and Second Waves of the Prison Massacre.
29. The evidence and information demonstrate that NOURY oversaw and participated in the torture of prisoners as well as the execution of prisoners in a widespread and systematic process of degradation and extermination of a significant portion of Iranian society purely on the basis of their political and religious beliefs.
30. It is apparent from the witness testimony that NOURY participated in or directed the widespread, systematic and unlawful torture of prisoners at Gohardasht Prison. It is also apparent from the evidence and information available that the sanctions administered, such as lashings of prisoners, by the Death Committees, and alleged to have been carried out by

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NOURY, can, in no way, be considered to have been lawful, and certainly not in such an instance where they emanated from proceedings entirely absent due process..

31. The Rome Statute and Genocide Convention place an obligation on states to investigate and punish cases of killing or inflicting severe bodily or mental harm on members of a “national, ethnical, racial or religious group as such” with the intent to destroy it, in whole or in part.¹² The MKO were treated as a religious group by their persecutors: those who did not repent their “hypocrisy” were killed for being “steadfast in their adherence to what the Iranian regime holds to be a corrupt version of Islam.”
32. We understand that Swedish law obliges the Swedish police to investigate any allegations that an individual may have committed war crimes, genocide or other crimes against humanity (in this instance, widespread and systematic torture, extra-judicial killing, and mass murder) and should those allegations be supported for the suspect to be prosecuted and tried before the Swedish courts.

VI. Requests

33. It is respectfully requested that the Swedish War Crimes Investigation Group commence an urgent investigation into NOURY’S alleged crimes, as evidenced by various witnesses and documented in various reports, for the purpose of establish his identity and determining whether there are sufficient grounds to arrest him on entry into Sweden.
34. Based on knowledge and belief, it is understood that NOURY will be travelling to Sweden from Iran on 8 November 2019. Consequently, there is considerable urgency in an immediate consideration of these representations and, having done so, taking all necessary and appropriate steps to detain NOURY on entry into Sweden on 8 November.

¹² See Convention on the Prevention and Punishment of the Crime of Genocide, adopted by Resolution 260 (III) A of the U.N. General Assembly on 9 December 1948; entry into force: 12 January 1951, Article III.

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VII. Contact

35. We should be grateful if you would confirm receipt of these representations with both McCue & Partners LLP, and Swedish counsel Mr Göran Hjalmarsson, who will be representing witnesses A, C, E and others. Our contact details are set out below.
36. You will note that the supplied witness statements are anonymised for the security of the witnesses. Introductions to the witnesses can be made via ourselves once we have received confirmation that this matter will be investigated, and that their safety and security can be assured.
37. We are available to meet with you at the earliest opportunity.

-- End --

MATTHEW JURY (Managing Partner)

REBECCA MOONEY (Consultant)

McCue & Partners LLP

4 November 2019

and

GÖRAN HJALMARSSON, ADVOKAT

Advokafirman Guide AB

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