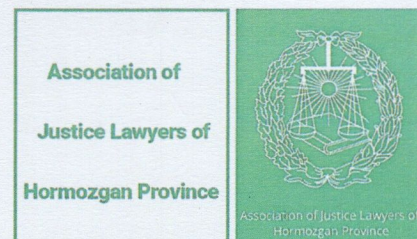


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To: United Nations Human Rights Council

From: Hormozgan Bar Association (Islamic Republic of Iran)

Subject: Formal Complaint Submitted to the United Nations Human Rights Council Pursuant to the Complaint Procedure under Resolution 5/1

The Hormozgan Bar Association, as an independent, non-governmental, and professional legal institution, formally commenced its operations in March 2022 following the successful conduct of its inaugural elections. Recognized as the twenty-seventh independent bar association in the Islamic Republic of Iran, it has since joined the wider legal community committed to upholding the rule of law.

The establishment of this Bar Association was grounded in a commitment to safeguard the independence of the legal profession, enhance citizens' legal rights, and deliver high-quality legal services to the honorable people of Iran, particularly those residing in Hormozgan Province.

The mission and core objectives of the Hormozgan Bar Association include the following:

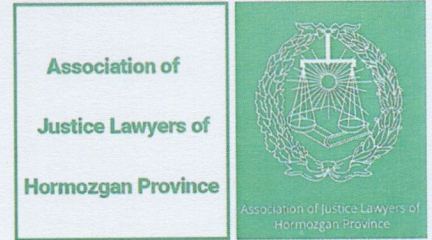
- Preserving the dignity and autonomy of the legal profession,
- Defending the professional and trade rights of its registered attorneys,
- Promoting the legal competence and knowledge of both licensed lawyers and trainee advocates through specialized educational programs,
- Providing legal advice and advocacy services to all segments of society,
- Advocating for justice and the protection of civil rights, and
- Cooperating with judicial and executive authorities to reform existing laws and judicial practices in alignment with human rights and legal standards.

The Association comprises first-degree attorneys, second-degree lawyers, and trainee advocates licensed in the province of Hormozgan. It endeavors to recruit highly qualified legal professionals in order to offer exemplary legal representation and assistance to the public.

Furthermore, the Hormozgan Bar Association actively engages in public legal education, offering specialized workshops and free legal consultations as part of its

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ongoing efforts to enhance access to justice and promote legal literacy within the broader community.

Subject of the Complaint:

“Report on the Gross and Systematic Violations of Fundamental Human Rights Resulting from the Recent Unlawful and Unauthorized Military Attacks Conducted by the Israeli Regime, Under the Command of Prime Minister Benjamin Netanyahu, Against the Territory of the Islamic Republic of Iran—Leading to the Killing and Injuring of Numerous Iranian Nationals, Including Civilians, Scientists, Women, and Children.”

General Information:

On 13 June 2025, the Israeli regime launched a series of unlawful and unauthorized aerial, missile, and drone attacks targeting areas within the sovereign territory of the Islamic Republic of Iran. These acts of aggression resulted in the death and injury of a number of Iranian citizens, including civilians—among them children, women, and the elderly.

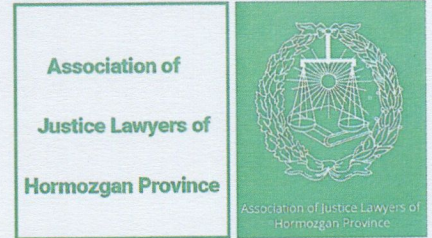
The attacks also struck non-military and civilian infrastructure, including media institutions such as national broadcasting facilities, as well as detention centers. These deliberate strikes against civilian objects constitute a grave breach of international humanitarian law, as well as a clear violation of the principles and norms of international human rights law, including the right to life, the right to security, and the protection of civilians during armed conflict.

Following a unilateral declaration of ceasefire by both parties on 25 June 2025, the military operations appeared to have been suspended by Israel. However, the consequences of the attacks remain severe and ongoing, and accountability for the resulting loss of life and damage to civilian infrastructure remains outstanding.

Instances of Violation:

1. Violation of the Principle of Respect for the Inherent Dignity of the Human Person

This principle, enshrined in *Article 1 of the Universal Declaration of Human Rights (UDHR)*, the *Preamble to the International Covenant on Civil and Political Rights (ICCPR)*, the *Preamble to the International Covenant on Economic, Social and Cultural Rights (ICESCR)*, *Articles 1 and 16 of the*



Convention against Torture (CAT), Article 1 of the Charter of Fundamental Rights of the European Union (CFREU), and the Preamble to the Cairo Declaration on Human Rights in Islam, has been gravely violated. The indiscriminate attacks targeting civilians undermine the fundamental dignity that must be preserved under international human rights and humanitarian law.

2. Violation of the Right to Life

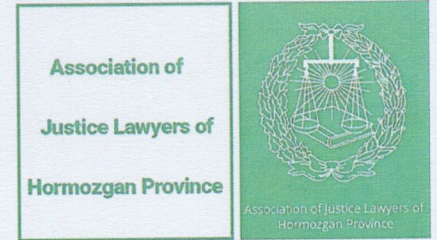
The right to life, safeguarded by *Article 3 of the UDHR, Article 6 of the ICCPR, Article 6 of the Convention on the Rights of the Child (CRC), the Convention against Torture, and General Comment No. 6 of the UN Human Rights Committee*, has been blatantly infringed. The unlawful and unauthorized military assault by the Israeli regime resulted in the death of numerous Iranian nationals, including non-combatants. The arbitrary deprivation of life, especially outside the bounds of national and international legal frameworks, constitutes a flagrant breach of customary and treaty-based international law. No individual or State may deprive persons of life except under conditions strictly permitted by law.

3. Violation of the Universal Declaration of Human Rights (UDHR)
Specifically, *Articles 3 and 5 of the UDHR* have been violated. The repeated missile and drone attacks against civilian-populated areas and non-military installations instilled widespread fear and psychological trauma among civilians, constituting a clear case of psychological torture. Such acts fall within the scope of cruel, inhuman, or degrading treatment or punishment, strictly prohibited under international law.

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4. Violation of the Right to Freedom of Expression and the Right to Access Information

Protected under *Article 19 of the UDHR, Article 19 of the ICCPR, Article 9 of the African Charter on Human and Peoples' Rights, and Article 13 of the CRC*, these rights were breached when, on 16 June 2025, the Israeli military targeted the headquarters of the national broadcasting authority (IRIB). This media outlet plays a vital role in informing the public, particularly during armed conflict, where access to reliable information is indispensable for safeguarding civilians' lives and property. The deliberate targeting of such a facility is a clear contravention of international humanitarian and human rights norms.



5. Violation of the Principles of Proportionality and Distinction in Armed Conflict
These principles, fundamental to *International Humanitarian Law (IHL)* and codified in the *Additional Protocols to the Geneva Conventions of 1949*, were egregiously violated. The Israeli regime's attacks inflicted disproportionate harm on civilians and civilian infrastructure, including the strike on Evin Prison on 23 June 2025, which severely damaged essential sections such as the prosecution office, infirmary, visiting halls, women's ward, and administrative buildings. These attacks resulted in numerous civilian casualties and injuries. Moreover, the targeted assassinations of nuclear scientists, who qualify as civilian personnel under IHL, constitute a violation of the aforementioned principles and may amount to war crimes under international law.
6. Violation of the Duty to Take Precautionary Measures
This violation pertains to the failure to observe precautionary obligations as enshrined in *Article 57 of Additional Protocol I to the 1977 Geneva Conventions*, *Principle 15 of the 1992 Rio Declaration on Environment and Development*, and both the *Preamble* and *Article 8 of the 1992 Convention on Biological Diversity*. The breach occurred when the Israeli regime, in collaboration with the United States of America, launched an unauthorized military attack on Iranian nuclear facilities on 22 June 2025, an operation referred to as "Midnight Hammer". These facilities were operating under the oversight of the *International Atomic Energy Agency (IAEA)* and within the framework of the *Treaty on the Non-Proliferation of Nuclear Weapons (NPT)*. The attack not only violated the sovereignty of the Islamic Republic of Iran, but also posed a grave threat to regional and international environmental security.

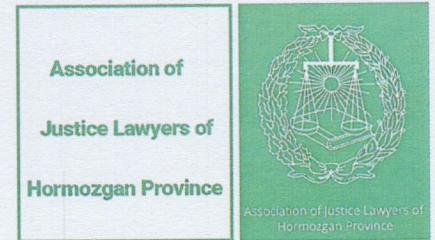
Statement of Claim:

The Hormozgan Bar Association (Islamic Republic of Iran), pursuant to Human Rights Council Resolution 5/1, hereby submit a formal complaint concerning the gross and systematic violations of human rights norms and principles resulting from the recent unlawful and unauthorized military aggression perpetrated by the Israeli regime against the territory of Iran.

On 13 June 2025, the Israeli regime, without obtaining authorization from any international bodies or competent authorities, committed an act of territorial aggression against Iranian soil. This aggression continued until the declaration of a ceasefire by

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both parties on 25 June 2025, during which time numerous civilians, including women, children, and non-combatant individuals, were killed or injured.

These actions constitute a clear and egregious violation of the foundational principles of the Charter of the United Nations, international humanitarian law, and international human rights law, and lack any legal justification under the framework of public international law.

The principle of respect for the inherent dignity of the human person—a cornerstone of international legal instruments—must be upheld at all times, whether in times of peace or armed conflict. The deliberate or indiscriminate targeting of civilians or civilian installations in the absence of military necessity constitutes a serious war crime under customary international law and a direct violation of States' obligations under the Four Geneva Conventions of 1949.

According to the Geneva Conventions, attacks on residential areas lacking military necessity and executed with disproportionate force are unequivocally deemed war crimes. Many of the locations targeted by Israel were situated far from any military installations and were, in some instances, publicly preannounced targets, thereby heightening the intentionality and unlawfulness of the attacks.

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Moreover, the Israeli regime has sought to spread fear among the civilian population by conducting extensive propaganda campaigns on social media regarding its unauthorized assaults. Although the regime purports to invoke self-defense as a legal basis, it has not obtained any authorization from the United Nations Security Council, rendering the operations devoid of international legitimacy.

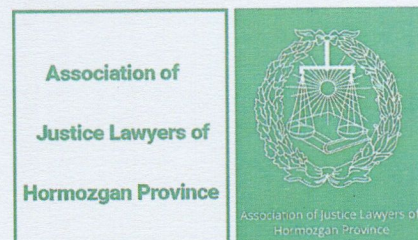
Accordingly, these acts are not only illegitimate but also qualify as acts of aggression and serious war crimes under international law.

Of particular concern is the attack on Iran's nuclear facilities, conducted by Israel with the cooperation of the United States, targeting sites that operate under the monitoring and safeguards of the International Atomic Energy Agency (IAEA) and within the legal framework of non-proliferation treaties. Beyond the violation of Iranian sovereignty, this act represents a severe threat to the regional and global environment and constitutes a flagrant breach of precautionary principles in international environmental and humanitarian law.

Request for Action and Submission of Evidence

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In light of the continued lack of accountability by international courts and institutions regarding the unauthorized military attacks against the sovereign territory of the Islamic Republic of Iran, the Hormozgan Bar Association respectfully urges the Honourable Human Rights Council to refer this complaint to the relevant Special Procedures and Working Groups for urgent review and to take all necessary measures within its mandate to address these serious violations.

Annexed Documentation:

1. Report of the United Nations Fact-Finding Mission and Special Rapporteur on the Israeli Attacks on Iranian Territory (dated 23 June 2025): According to this official report, the Israeli regime was explicitly urged to act in compliance with international law and to take immediate steps to prevent further civilian casualties. The report outlines that the conflict—initiated by a wave of Israeli aerial assaults on 13 June 2025—was further escalated by U.S. strikes on Iranian nuclear facilities located in Fordow, Natanz, and Isfahan, causing widespread psychological trauma among the Iranian population.

The report documents the deaths of hundreds of civilians, including women and children, as a result of Israeli air raids, with millions displaced from urban centers in fear of further attacks. Civilians endured sleepless nights under the constant sound of air-raid sirens, and children were unable to attend school, leading to the psychological destabilization of entire communities, many of whom were forced to flee their homes in search of shelter.

The Fact-Finding Mission strongly challenged the Israeli government's assertion that it was solely targeting military objectives. It emphasized that many attacks—such as the strike on the national broadcasting headquarters (IRIB), reportedly resulting in three fatalities, and the targeted killings of Iranian scientists—constitute clear violations of the principle of distinction under international humanitarian law.

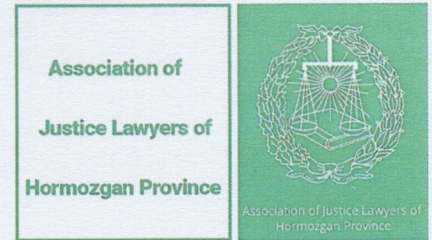
As of 21 June 2025, the Iranian Ministry of Health reported at least 400 fatalities, including no fewer than 54 women and children, and over 3,056 injured, with hospitals and residential areas among the affected targets.

The report further notes:

- Among the deceased in Tehran were dozens of residents from a single apartment complex and three humanitarian workers from the Iranian Red Crescent Society.

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- Damaged facilities included a clinic for children with autism and a hospital in Kermanshah.
- Other documented strikes resulted in high civilian casualties and the widespread destruction of civilian infrastructure.

Finally, the report raises grave concerns regarding the lack of effective prior warnings issued by the Israeli military, which may have significantly impaired the ability of civilians to seek safety. This omission constitutes a serious breach of the principles of proportionality, distinction, and precaution as codified in international humanitarian law.

2. Report of Mr. Nasser Seraj, Secretary of the High Council for Human Rights of the Islamic Republic of Iran, addressed to Mr. Volker Türk, United Nations High Commissioner for Human Rights (dated 12 July 2025):

This report, closely aligned in content with the abovementioned Fact-Finding Mission report, confirms that the armed forces of the Israeli regime deliberately launched two separate missile attacks against the Islamic Republic of Iran Broadcasting (IRIB) headquarters. The assaults, clearly intentional, resulted in the partial destruction of national media infrastructure, disrupted public information dissemination, and tragically led to the death and injury of media personnel engaged solely in informing the civilian population.

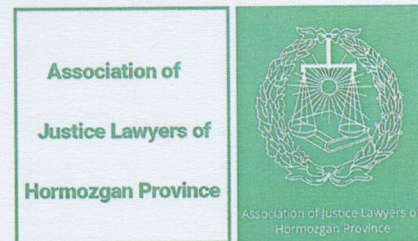
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Moreover, recent attacks on healthcare facilities, Iranian Red Crescent buildings, ambulances, and vicinities of hospitals have caused damage to critical infrastructure, led to civilian casualties, and instilled widespread fear among residents. The report also highlights the targeted strike on Evin Prison—a principal detention facility in Tehran—where essential structures including the main entrance, prison infirmary, kitchen, visitation areas, and administrative offices (frequented by attorneys and families of inmates) were hit. The targeting of detained individuals, who are afforded special protection under international humanitarian and human rights law, represents a grave breach of both legal regimes.

In the final hours before the ceasefire, the Israeli regime conducted large-scale attacks on urban districts 6 and 7 of Tehran, and on several provincial cities such as Babol, Babolsar, Astaneh Ashrafieh, Chamestan, and others, causing numerous civilian deaths and injuries, alongside extensive urban infrastructure damage.

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Mr. Seraj further reports that the Israeli regime, with the intent to assassinate Iranian nuclear scientists, targeted residential homes in strictly civilian areas. These attacks not only violate the right to life and the principle of distinction, but also amount to state-sponsored terrorism and war crimes under customary international law.

Additionally, the report cites that the Israeli regime's conduct violates its obligations to respect and ensure fundamental human rights, including:

- Right to life (*Article 6*),
- Right to personal security (*Article 9*),
- Freedom of expression and access to information (*Article 19*).

It also presents credible and corroborated evidence implicating the United States of America as an active participant in the execution of these attacks, including:

- The aerial bombardment of Iranian nuclear facilities in Fordow, Isfahan, and Natanz,
- The provision of satellite intelligence,
- Operational support, aerial refueling, and
- Intelligence sharing.

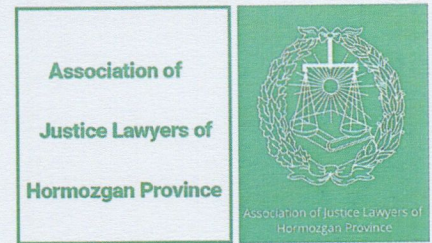
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As such, under Article 16 of the ILC's Draft Articles on Responsibility of States for Internationally Wrongful Acts, the United States bears international responsibility as a state aiding and abetting the commission of internationally wrongful acts.

Mr. Seraj concludes by calling upon the Office of the High Commissioner for Human Rights to:

- Formally register the aforementioned violations,
- Initiate an independent and formal investigation,
- Refer the matter to relevant mechanisms within the Human Rights Council, and
- Mobilize relevant country and thematic Special Rapporteurs to assess the humanitarian and legal dimensions of the crisis.

He also requests the issuance of formal communications to the Israeli regime and the United States, demanding accountability for the aggressive attacks, the devastating



effects on civilian life, the violation of press freedom, and the psychological insecurity imposed on the affected communities.

3. The Israeli Regime's Airstrike on Evin Prison – 23 June 2025:

On 23 June 2025, at approximately 13:00 local Tehran time, the Israeli regime carried out a deliberate missile strike targeting Evin Prison, located in the Darakeh-Velenjak region in northern Tehran. The assault resulted in severe damage to key prison structures, including the main entrance gate, the prosecutor's office, in-person visitation center, administrative buildings, the Ward 4 library, and the medical facility.

According to the official figures released by the Judiciary's spokesperson, the attack resulted in the martyrdom of 71 individuals, and numerous injuries among:

- Inmates,
- Visiting family members,
- Judicial and administrative personnel,
- Military conscripts, and
- Residents of the nearby areas.

This act constitutes a serious breach of international humanitarian law and a deliberate attack on civilian objects, qualifying as a grave war crime under international criminal jurisprudence.

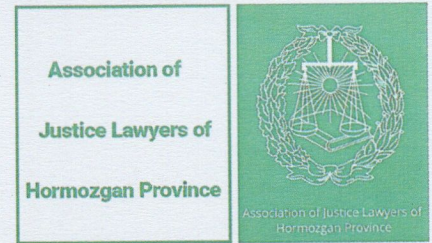
4. On the Claim of Self-Defense by the Israeli Regime:

The justification of "self-defense" asserted by the Israeli regime cannot be accepted under international legal standards, as strict criteria must be met for the invocation of self-defense, as established in the jurisprudence of international courts and tribunals.

The recent Israeli attack fails to meet these criteria and, when assessed against United Nations General Assembly Resolution 3314 (1974) on the Definition of Aggression, it clearly qualifies as an act of armed aggression, thereby triggering:

- International State responsibility, and
- Individual criminal liability of high-ranking Israeli officials under international criminal law.

5. Legal Characterization under International Criminal Law:



Under the jurisprudence of international courts, the conduct of the Israeli regime constitutes a clear instance of war crimes. Pursuant to *Article 8(2)(b)(ii) and (iv)* of the Rome Statute of the International Criminal Court (ICC), the following acts qualify as war crimes:

- Intentionally directing attacks against the civilian population or against civilian objects, in the absence of military necessity, and
- Launching disproportionate attacks in violation of the principle of proportionality.

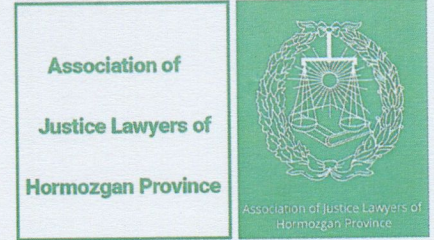
These actions represent a blatant contradiction of customary international law and the obligations imposed on all States under the Four Geneva Conventions of 1949.

6. Violation of the Principle of Shared Environmental Responsibility
According to the 1972 Stockholm Declaration and the 1992 Rio Declaration on Environment and Development, States bear common but differentiated responsibilities for the protection of the environment, and must cooperate to prevent environmental degradation and pollution. The unauthorized attack by the Israeli regime on Iran's nuclear facilities, carried out in collaboration with the United States of America under the code name "Operation Midnight Hammer", constitutes a violation of this principle. This attack occurred on 22 June 2025 at 2:10 a.m. (Tehran local time), targeting sensitive nuclear infrastructure in Fordow (Qom Province), Natanz (Isfahan Province), central Isfahan, and the city of Arak. These facilities, monitored by the International Atomic Energy Agency (IAEA) and operated within the framework of non-proliferation treaties, were civilian in nature, and the assault therefore raises serious concerns regarding environmental safety, human security, and compliance with international legal norms.

7. Violation of Fundamental Principles of International Humanitarian Law (IHL)
Pursuant to fundamental rules of IHL, particularly the principle of distinction between civilians and combatants, as enshrined in *Article 48 of Additional Protocol I (1977) to the Geneva Conventions*, intentional or disproportionate attacks against residential buildings, absent military necessity, constitute war crimes. The United Nations General Assembly, through Resolutions 49/196 and 53/164, and the former Commission on Human Rights, through Resolutions 1993/7, 1994/72, and 1995/89, has repeatedly condemned acts aimed at terrorizing civilian populations. The

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recent military actions by the Israeli regime fall squarely within this prohibited conduct, and represent grave breaches of customary international humanitarian law.

Requests and Recommendations:

1. Formal registration of this complaint by the United Nations Human Rights Council.
2. Immediate consideration of the report and supporting documentation by the Council.
3. Official condemnation of the violations of international humanitarian law committed by the Israeli regime.
4. Mandating the responsible State to provide accountability and full reparation for the damage inflicted.
5. Initiating investigations into the commission of war crimes and crimes against humanity, with particular attention to the role of commanding officials, notably the Prime Minister of the Israeli regime, Benjamin Netanyahu.

Confidentiality and Good Faith Declaration:

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The Hormozgan Bar Association, in full compliance with the provisions of the Complaint Procedure established under Human Rights Council Resolution 5/1, hereby submits this complaint without any political motivation, but solely in defense of the fundamental principles of human rights and on behalf of the Iranian people, in response to the grave violations and war crimes committed by the Israeli regime.

Respectfully submitted,

Chairperson of the Board of Directors

Hormozgan Bar Association – Islamic Republic of Iran

Date :22 July 2025