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Investigating the 1981 Massacre in Iran: On the Law-Constituting Force of Violence

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ABSTRACT

The 1981 massacre of political dissidents could be considered the most extensive atrocity committed by the Iranian government after the 1979 Revolution. Yet, this massacre is one of the least investigated aspects of state-sponsored violence in contemporary Iran. In this article, we aim to shed light on the nature and scope of this forgotten massacre. The central thesis of this article is twofold. First, we claim that the 1981 massacre was a mass atrocity characterized by the extra-legal use of state violence. To substantiate this claim, we draw on first-hand archival material and empirical evidence that were collected during fieldwork. Secondly, we claim that the 1981 massacre played a major role in establishing the legal foundations of the theocracy that has remained in power for more than four decades. On a political level, this massacre took place within a crisis that was caused by post-revolutionary circumstances. During this crisis, the clerical rule seized power by suspending the pre-revolutionary legal order. On a legal level, the execution of political dissidents was carried out within a legal vacuum. The practices of Islamic Revolutionary Courts filled this legal vacuum and paved the way for the ratification of the first Islamic Penal Code (1982). The manifestation of state violence during the 1981 massacre embodies the fundamental characteristics of a political system that has built its foundations upon the disintegrated bodies and ruins of its political others.

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Introduction

Shortly after the 1979 revolution in Iran, Shi'a clerics took control of most political institutions and ferociously mobilized their forces to establish a religious dictatorship in the second-largest country in the Middle East.¹ The newly formed government of the Islamic Republic represented a religious worldview with totalitarian

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¹ Fred Halliday, "Year Three of the Iranian Revolution," *MERIP Reports* 104 (1982): 3-5; Ervand Abrahamian, *A History of Modern Iran* (Cambridge: Cambridge University Press, 2018), 169; Leila Faghfour Azar and Shahin Nasiri, *The Repressed Voices of the Iranian Revolution [Ravayat-haye az Khak Barkhaste-ye Enghelab]* (Sweden: Baran, 2020), 7-18.

characteristics.² Since early 1979, violent oppression and the elimination of dissidents and critics has become the government's central strategy for securing its political survival and stability. This strategy has been justified under the slogan of defending the foundations of the Revolution and Islam.³ Between June 1981 and March 1982, the clerical rule carried out one of the largest mass execution of political opponents in Iranian history, including communists, socialists, social democrats, moderate Islamists, liberals, monarchists, and followers of the Bahá'í Faith.⁴ This massacre (hereafter called "the 1981 massacre") could be considered the most extensive mass atrocity that was committed by the Islamic Republic of Iran after the 1979 revolution.⁵ This mass atrocity has received insufficient scholarly and legal attention over the past few decades.

In this article, we examine the nature and scope of this neglected massacre. The central thesis of this article is twofold. Firstly, we claim that the 1981 massacre was carried out in a legal vacuum through the extra-legal use of state violence. To substantiate this claim, we draw on first-hand archival material and empirical evidence that were collected during a piece of multi-faceted fieldwork. This field research allows us to verify the identity of hundreds of dissidents and to geolocate their burial locations. In addition, we draw on official statements of the judiciary authorities published in state-run newspapers within the period of the research. These include official statements and press releases issued by the Islamic Revolutionary Courts, high-ranking judicial officers, and the Islamic Revolutionary Guard Corps (IRGC).⁶

Secondly, this article claims that the 1981 massacre played a major role in establishing the legal foundations of the theocracy that has remained in power for more than four decades. From a political point of view, this state violence enabled the regime to monopolize political power and establish a totalitarian theocratic system.⁷ From a legal point of view, the ill-grounded and ruthless nature of legal proceedings and trials, by which thousands of political opponents were sentenced to death during the 1981 massacre, attest to the gravity of an uninvestigated and untried state crime.⁸ By analyzing the role of this massacre in the development and ratification of the Islamic Penal Code of 1982, the institutionalization of Islamic Revolutionary Courts, and construction of mass graves, this article concludes that the 1981 massacre represents the law-constituting dimension of political violence by which a totalitarian system establishes its legal foundations.

² Mehdi Mozaffari, *Islamist Policy* (Aarhus: Centre for Studies in Islamism and Radicalisation, Aarhus University, 2009); Mehdi Mozaffari, *Islamism: A New Totalitarianism* (Boulder, CO: Lynne Rienner Publishers, 2017).

³ Mohammad Mohammadi Gilani, "Who is a Mohareb under the Islamic Law?" [translated title], *Jomhuri-e Eslami*, 14 October 1981, 7; Payam Akhavan, "Is Grassroots Justice a Viable Alternative to Impunity? The Case of the Iran People's Tribunal," in *Human Rights and Agents of Change in Iran*, ed. Rebecca Barlow and Shahram Akbarzadeh (Singapore: Palgrave Macmillan, 2018), 86.

⁴ In this regard, see Ervand Abrahamian, *The Iranian Mojahedin* (London: I.B. Tauris: 1989), 181.

⁵ Under the international criminal law scholarly literature, the term "mass atrocity crimes" refers to three legally defined international crimes: genocide, war crimes, and crimes against humanity. In this article, we adopt the term "mass atrocity" consistently to qualify the legal implications of the 1981 massacre. We acknowledge categorizing the 1981 massacre under a precise criminal title requires an independent appropriate legal investigation.

⁶ This research was carried out in direct collaboration with Parvaneh Forouzandeh and other members of Rastyad Collective who wish to remain anonymous.

⁷ Faghfour Azar and Nasiri, *The Repressed Voices of the Iranian Revolution*, 4-18; Halliday, "Year Three of the Iranian Revolution."

⁸ See Mozaffari, *Islamist Policy*; Mozaffari, *Islamism: A New Totalitarianism*; Geoffrey Robertson, *Mullahs Without Mercy: Human Rights and Nuclear Weapons* (London: Biteback Publishing, 2012); David D. Roberts, *Totalitarianism* (Cambridge: Polity, 2020), 102.

Historical Background of the 1981 Massacre

Historically speaking, the 1981 massacre was carried out on the pretext of the Iranian Cultural Revolution. The Cultural Revolution [*enghelab-e farhangī*] was an all-encompassing purge modeled on the Chinese Cultural Revolution, and with similar catastrophic consequences.⁹ Following an executive order issued by Ayatollah Khomeini on 14 June 1980, the Cultural Revolution was orchestrated by the clerical rule to “purify” higher education from undesirable non-Islamic, Western, liberal, or leftist elements.¹⁰ As a result of this oppressive policy, government forces closed universities from 1980 to 1983, banned all independent students’ unions, and violently occupied most university campuses.¹¹ In the same period, Shi’a clerics and their supporters carried out a series of policies with the aim of transforming Iranian society into a Shi’ite theocracy.¹² This project of Islamification was manifested in the gradual enforcement of Islamic dress codes and mandatory Hijab for women, systematic exclusion of independent and secular political parties from the public domain, the expulsion of critical academics from universities, and the active harassment and persecution of intellectuals and artists.¹³

These oppressive developments gave rise to growing discontent among citizens and provoked massive protests in different parts of the country. On 15 June 1981, the National Front of Iran—along with other secular opposition groups—publicly criticized a legislative proposal concerning the Islamification of the criminal justice system.¹⁴ On the same day, the supreme leader, Ayatollah Rouhollah Khomeini, issued a *fatwā* against these groups and accused the National Front of apostasy (*ertedad*) and collaboration with “anti-Islam” communists and “hypocrites” (*munafiqs*).¹⁵ In the same statement, he underscored that all critics of Sharia law “have dug their graves with their own hands”.¹⁶ A few days later, this statement led to the mass arrest of hundreds of young protestors and critics.¹⁷

On 20 June 1981, the country witnessed the largest anti-government demonstration thus far, which was organized by the People’s Mojahedin Organization of Iran (PMOI, hereafter referred to as “Mujahedin-e Khalq”) in reaction to the broadly contested

⁹ Khosrow Sobhe, “Education in Revolution: Is Iran Duplicating the Chinese Cultural Revolution?” *Comparative Education* 18, no. 3 (1982): 271-280.

¹⁰ Ruhollah Khomeini, *Ṣaḥīfeh-ye Imām: An Anthology of Imam Khomeini’s Speeches, Messages, Interviews, Decrees, Religious Permissions, and Letters* (vol. 12) (Tehran: The Institute for Compilation and Publication of Imām Khomeini’s Works, 2008), 368-369.

¹¹ Shahrzad Mojab, “State-University Power Struggle at Times of Revolution and War in Iran”, *International Higher Education* 36 (2004): 11-13; Nasser Mohajer, *Voices of a Massacre: Untold Stories of Life and Death in Iran, 1988* (London: Oneworld, 2020), Appendix B.

¹² Said Amir Arjomand, *After Khomeini: Iran Under His Successors* (Oxford: Oxford University Press, 2012), 26.

¹³ Janet Afary, *Sexual Politics in Modern Iran* (Cambridge: Cambridge University Press, 2009), 12; Mohajer, *Voices of a Massacre*, Appendix B; Faghfourī Azar and Nasiri, *The Repressed Voices of the Iranian Revolution*, 19-27.

¹⁴ “Call for Protest”, The National Front of Iran, 9 June 1981 <https://www.iran-archive.com/sites/default/files/2021-07/jebhe-melli-elamiie-khordad-1360.pdf>, (Accessed 27 June 2022).

¹⁵ After the Iranian Revolution, the Shi’a clergy and Sharia judges used the term “hypocrite” (*munafiq*) to characterize People’s Mojahedin Organization of Iran (the PMOI), which was the largest opposition group in the 1980s.

¹⁶ Ruhollah Khomeini, *Ṣaḥīfeh-ye Imām: An Anthology of Imam Khomeini’s Speeches, Messages, Interviews, Decrees, Religious Permissions and Letters* (vol. 14) (Tehran: The Institute for Compilation and Publication of Imām Khomeini’s Work, 2008), 392-393.

¹⁷ See Abrahamian, *The Iranian Mojahedin*, 219-220. According to Shi’a jurisprudence, a *fatwā* is an executive order of the highest legal and political effect that is issued by the highest legal authority in an Islamic state. In the context of the Islamic Republic, *fatwās* are issued by the supreme leader and have the power of overruling existing legislation. T. Editors of Encyclopaedia Iranica, “Fatwā”. *Encyclopædia Iranica*, 24 January 2012, <https://iranicaonline.org/articles/fatwa> (Accessed 1 December 2021).

impeachment of Abolhasan Bani-Sadr, the first president of the Islamic Republic.¹⁸ According to Abrahamian, these protests—which were also supported by other left-wing opposition groups—took place in many cities across the country, such as Tehran, Shiraz, Tabriz, Ahvaz, Isfahan, and Mashhad.¹⁹ It is estimated that dozens of protestors were shot dead in the streets that day.²⁰ On 21 June 1981, the Islamic Revolutionary Court of Tehran published a statement announcing the execution of Saeed Soltanpour (an internationally acclaimed poet and playwright) and fourteen other leftist activists.²¹ On 26 June, Ali Khamenei—current Supreme Leader of the Islamic Republic—gave a Friday Prayer Speech (*khutbah*) and warned all critics of the government, including sympathizers of Mujahedin-e Khalq, Marxist organizations, and other secular political parties, that they would be regarded and treated as enemies of Islam and Allah (*moharebs*), hypocrites (*munafiqs*), and apostates (*murtads*).²² These events mark the beginning of the mass execution of thousands of dissidents that lasted from June 1981 to March 1982.²³

Although the 1981 massacre represents the first nationwide mass execution of political dissidents after the revolution (and arguably the largest in terms of scope), this mass atrocity has received insufficient legal and scholarly attention on both the national and international levels.²⁴ This misrecognition stems, primarily, from the state-sponsored policy of total secrecy and denial, through which the Iranian authorities have distorted the facts relating to the elimination of its opponents for decades.²⁵ Since the early 1980s, the clerical rule has, systematically and willingly, tried to cover up all traces, records, and documents that could serve as evidence for investigating atrocities committed by the state. This massacre is no exception. It bears noting that the 1981 massacre took place at the beginning of the Iran-Iraq War (1980-1988), which offered the Iranian government a unique opportunity to get rid of its opponents, without fear of serious criticism from the international community.

Moreover, the massacre seems to have been overshadowed by a second wave of mass executions that occurred in 1988. In the last days of the Iran-Iraq war, Khomeini issued a secret *fatwā*, which was intended to exterminate all political prisoners who had survived

¹⁸ "Iranian Parliament Finds Bani-Sadr Unfit for Office", *New York Times*, 22 June 1981, 1; Reuters, "Iranian Parliament Begins; Proceedings to Oust Bani-Sadr," *The New York Times*, 21 June 1981; Halliday, "Year Three of the Iranian Revolution," 3-5; Abrahamian, *A History of Modern Iran*; Faghfour Azar and Nasiri, *The Repressed Voices of the Iranian Revolution*, 8-12; T. Editors of Encyclopaedia Britannica, "Abolhasan Bani-Sadr" *Encyclopedia Britannica*, 18 March 2022, <https://www.britannica.com/biography/Abolhasan-Bani-Sadr> (Accessed 22 March 2022).

¹⁹ Abrahamian, *The Iranian Mojahedin*, 218.

²⁰ *Ibid.*, 219.

²¹ The Islamic Revolutionary Court of Tehran, "Names of 15 Executed Counterrevolutionaries [translated title]," *Jomhuri-e Eslami*, 23 June 1981, 3.

²² Ali Khamenei, "Friday Prayer Speech, 26 June 1981," *doctv.ir*, <https://www.youtube.com/watch?v=PjejaBOMg-c> (Accessed 1 December 2021).

²³ Halliday, "Year Three of the Iranian Revolution"; Abrahamian, *The Iranian Mojahedin*; Abrahamian, *A History of Modern Iran*; Faghfour Azar and Nasiri, *The Repressed Voices of the Iranian Revolution*.

²⁴ For early human rights reports about the 1981 massacre, see United Nations Economic and Social Council (ECOSOC), *Preliminary Report by the Special Representative of the Commission, Mr. Andrés Aguilar, Appointed Pursuant to Resolution 1984/54, on the Human Rights Situation in the Islamic Republic of Iran*. 1 February 1985. UN Doc E/CN.4/1985/20, 7-8; Amnesty International, "Iran: Execution Toll Now Over 4000," *Amnesty International Newsletter* 8, no. 3 (1982): 1.

²⁵ António Guterres, *Report of the Secretary-General of the United Nations on the Situation of Human Rights in the Islamic Republic of Iran*, (Report No A/HRC/47/22), United Nations, 5; Javaid Rehman, *Report of the Special Rapporteur of the Human Rights Council on the Situation of Human Rights in the Islamic Republic of Iran*, 2021 (Report No A/76/160), United Nations 5; Geoffrey Robertson, "Iran's Next President Should Face Justice for his Role in Mass Executions in the 1980s," *The Guardian*, 30 June 2021, <https://www.theguardian.com/commentisfree/2021/jun/30/iran-president-mass-executions-1980s-ebrahim-raisi> (Accessed 1 December 2021).

earlier mass murders.²⁶ As a result, in the summer of 1988, thousands of political prisoners were sentenced to death by the Islamic Revolutionary Courts. These prisoners were executed in large numbers, and most were buried in secret mass graves all over the country.²⁷ Although denied by government officials for many years, the 1988 massacre has received public recognition and lots of political and scholarly attention over the past few years.²⁸

For example, Abrahamian has examined the 1988 massacre in his historiographical examination of torture in the context of modern Iran.²⁹ Robertson has carried out a comprehensive investigation into the legal implications of the 1988 massacre.³⁰ According to Robertson, this massacre should be characterized as a serious violation of “*jus cogens* rules of international law which entail both state responsibility and individual accountability for war crimes and crimes against humanity.”³¹ More recently, Mohajer has offered first-hand accounts of the massacre based on the narratives of former political prisoners and survivors.³² The 1988 massacre has also received significant attention from international human rights bodies. Most notably, seven United Nations special rapporteurs submitted an official communication to Iranian authorities on 3 September 2020, demanding an investigation of “the massacre of the political prisoners in 1988”. These rapporteurs have characterized this massacre as “crimes against humanity of murder, extermination, persecution, torture, and other inhumane acts [...]”.³³ In addition, the Swedish judicial authorities initiated a legal proceeding against one of the alleged perpetrators of the 1988 massacre and are, currently, prosecuting him on charges of “grave war crimes” and “murder” during 1988.³⁴

In contrast to the 1988 massacre, there are no scholarly works that examine the legal and political implications of the 1981 massacre as a separate case study. Admittedly, Abrahamian, Robertson, and Mohajer emphasize the historical significance of the first wave of mass executions in 1981 and acknowledge that most victims of the 1988 massacre were prisoners who had survived the mass killings in the early 1980s.³⁵ Abrahamian characterizes the period between 1981 and 1988 as “the reign of terror” and suggests that the June 1981 uprising unleashed “waves of repression unprecedented in Iranian history”. In addition, he indicates that 2,665 individuals were executed between August and November 1981 by “the Revolutionary Tribunals”, including 2,200 members and sympathizers of

²⁶ Hussein Ali Montazeri, *Montazeri Diaries [Khaterat-e Ayatollah Montazeri]*, (Persian Edition. Ketab Publishing, 2001), 623-625; Geoffrey Robertson, *The Massacre of Political Prisoners in Iran, 1988* (The Abdorrahman Boroumand Foundation, 2011), 41-42.

²⁷ The letter by Seven UN Special Rapporteurs. *AL IRN 20/2020*, Geneva: United Nations, 3 September 2020, <https://spcommreports.ohchr.org/TMResultsBase/DownloadPublicCommunicationFile?gld=25503> (Accessed 1 December 2021), 2; Robertson, *The Massacre of Political Prisoners in Iran*.

²⁸ Also see, Parliament. House of Commons, *Recognising the 1988 Massacre in Iran*, EDM (Early Day Motion) 615: tabled on 3 November 2021, London: House of Commons, <https://edm.parliament.uk/early-day-motion/59101> (Accessed 1 December 2021); “Sweden Charges Man Over 1988 Iran Prison Massacre”, *The British Broadcasting Corporation (BBC)*, 28 July 2021, <https://www.bbc.com/news/world-europe-57996483> (Accessed 1 December 2021); Robertson, *The Massacre of Political Prisoners in Iran*.

²⁹ Ervand Abrahamian, *Tortured Confessions: Prisons and Public Recantations in Modern Iran*, (Berkeley, CA: University of California Press, 1999).

³⁰ Robertson, *The Massacre of Political Prisoners in Iran*.

³¹ *Ibid.*, 111.

³² Mohajer, *Voices of a Massacre*, preface.

³³ The letter by Seven UN Special Rapporteurs. *AL IRN 20/2020*

³⁴ Prosecution for War Crimes in Iran, *Swedish Prosecution Authority*, 27 July 2021 <https://www.aklagare.se/en/media/press-releases/2021/july/prosecution-for-war-crimes-in-iran/> (Accessed 1 March 2022).

³⁵ Abrahamian, *Tortured Confessions: Prisons and Public Recantations in Modern Iran*, 181; Robertson, *The Massacre of Political Prisoners in Iran*, 22-24; Mohajer, *Voices of a Massacre*, 2.

Mujahedin-e khalq and 400 leftists and Marxists.³⁶ Although our data show that this estimate is inaccurate, the general claim that more than 2,600 dissidents were executed in those months is plausible.³⁷ Still, Abrahamian does not sufficiently specify which sources (whether primary or secondary) he has explored to support his empirical findings.³⁸ Mohajer also recognizes that existing estimates about the actual scope of the 1981 massacre lack accuracy and sufficient empirical support. According to Mohajer, current estimates have a large margin of error and generally suggest that between 5,000 to over 10,000 dissidents were killed from June 1981–1983.³⁹ These methodological and empirical shortcomings represent the limitations of existing literature concerning the nature and scope of the 1981 massacre.

Method and Theoretical Framework

The 1981 massacre of political dissidents is a particularly important case as it represents how mass political violence plays a decisive role in establishing and maintaining a new juridico-political order. According to Weber's theory concerning the interrelation of modern state and violence, the state is the only institution that has the monopoly on the legal use of violence (force). Violence serves as a legally sanctioned instrument that state institutions (such as the police, military, and penal system) could deploy to enforce legally permissible ends, such as maintaining public order or defending territorial sovereignty of the nation-state.⁴⁰ On this view, the legitimacy or illegitimacy of violence and its proportionality is determined and confined by the established legal order.⁴¹ The use of violence is justified only if it does not violate the law. Therefore, violence is subordinated to the rule of law and serves as a means for realizing legitimate ends.

As Benjamin observes, this positivist account fails to account for the constituent power of violence that manifests itself in moments of political crises.⁴² By tracing the extra-legal origins of state violence, he introduces the concept of "law-constituting violence" (*die rechtsetzende Gewalt*) and shows how violence functions as a creative force in the process of the formation of a new juridico-legal order.⁴³ For Benjamin, the law-constituting violence transcends the means-ends rationality and cannot be explained through the lens of legitimacy or proportionality. In the context of political crises, violence obtains a law-constituting character and creates a new field of power that replaces the (formerly) established juridico-political order.⁴⁴

³⁶ Abrahamian, *Tortured Confessions: Prisons and Public Recantations in Modern Iran*, 181.

³⁷ See figure 1.

³⁸ It seems that his estimates are, primarily, based on secondary sources and lists that were published by several opposition groups in the 1980s.

³⁹ Mohajer, *Voices of a Massacre*, 2.

⁴⁰ Andreas Anter, "The Modern State and its Monopoly on Violence," in *The Oxford Handbook of Max Weber*, ed. Edith Hanke, Lawrence A Scaff and Sam Whimster (New York: Oxford University Press, 2020), 228-230.

⁴¹ Tony Waters and Dagmar Waters, *Weber's Rationalism and Modern Society: New Translations on Politics, Bureaucracy, and Social Stratification* (New York: Palgrave Macmillan, 2015), 135-138.

⁴² Gavin Rae, *Critiquing Sovereign Violence: Law, biopolitics and bio-juridicalism* (Edinburgh: Edinburgh University Press, 2019), 26-29.

⁴³ Walter Benjamin, "Zur Kritik der Gewalt," in *Gesammelte Schriften III*, ed. Rolf Tiedemann and Hermann Schweppenhäuser (Frankfurt a.M.: Suhrkamp, 1999), 179-204.

⁴⁴ Christoph Menke, *Law and Violence: Christoph Menke in Dialogue* (Manchester: Manchester University Press, 2018), 28-37; Bruce B. Lawrence and Aisha Karim, *On Violence: A Reader* (Durham: Duke University Press, 2007): 274-275.

In recent theoretical debates, mass execution of political opponents, widespread practices of torture, forced removal of ethnic and religious minority groups during war, revolution, and coup d'état are exemplary cases in which violence presents its law-constituting power. The primary function of state violence in these critical occasions is to overthrow the pre-crisis order and establish a new one.⁴⁵ As Menke, Balibar and Agamben argue, the transition from the pre-crisis to post-crisis order takes place in a legal vacuum, in which political violence manifests itself as a law-constituting force. Thus, the condition of crisis embodies the absence of laws that could determine the validity and limits of state violence in the Weberian sense.⁴⁶ The legal vacuum could be viewed as the transitory condition of "lawlessness", in which the state resorts to extra-legal violence in order to constitute its legal foundations.⁴⁷

During the revolutionary period, the newly emerged regime seizes power by suspending the laws of the previous political order. In this transitory condition of lawlessness, political violence has an extra-legal nature and plays a major role in the creation of a new juridico-political order. Following this Benjaminian approach, it could be maintained that the 1981 massacre is a paradigm case of law-constituting violence. On a political level, this massacre took place within a political crisis that was caused by post-revolutionary circumstances. During this crisis, the clerical rule created a legal vacuum by suspending the pre-revolutionary legal order. On a legal level, the practices of Islamic Revolutionary Courts that emerged in exceptional post-revolutionary circumstances filled this legal vacuum. These practices gave shape to the Islamic Penal Code of 1982, which represents the first legal manifesto of the present-day clerical rule.

To study the case of the 1981 massacre, this article adopts a mixed-method approach and draws on fieldwork and archival research. Our fieldwork consists of a case study of individuals who were executed in the city of Tehran. Specifically, this fieldwork focuses on the largest cemetery of the city, Behesht-e Zahra.⁴⁸ This case was chosen as Tehran had the largest number of victims in that period and, in many respects, serves as a representative sample for the purpose of our analysis. In Behesht-e Zahra, we geolocated and carefully examined five sites (officially called "sections") where most victims of the 1981 massacre were buried. By checking all available information inscribed on gravestones (including names, burial dates, age, and coordinates), we compiled a list of potential victims.⁴⁹ Accordingly, we identified and documented personal details of approximately 1,000 individuals who were executed between June 1981 and March 1982.

Subsequently, we examined and verified all collected data by conducting multi-faceted archival research. In that research, we explored various archival materials, such as state-run newspapers, lists provided by political organizations, and information offered by

⁴⁵ Étienne Balibar, *Violence and Civility: On the Limits of Political Philosophy*, trans. G. M. Goshgarian (New York: Columbia University Press, 2015), 103; James Martel, "Walter Benjamin," in *Histories of Violence: Post-War Critical Thought*, ed. Brad Evans and Terrell Carver, (London: Zed Books, 2017), 14-30. Also see, Ekkart Zimmermann, *Political Violence, Crises and Revolutions: Theories and Research* (London: Routledge, 2013).

⁴⁶ Christoph Menke, *Critique of Rights* (Cambridge and Medford, MA, 2020), 113-114; Balibar, *Violence and Civility: On the Limits of Political Philosophy*, 104-105; Giorgio Agamben, *Homo Sacer: Sovereign Power and Bare Life*, trans. Daniel Heller-Roazen (Stanford: Stanford University Press, 1998), 26.

⁴⁷ Marc de Wilde, "Meeting Opposites: The Political Theologies of Walter Benjamin and Carl Schmitt," *Philosophy & Rhetoric* 44, no. 4 (2011): 369.

⁴⁸ Geographic coordinates of Behesht-e Zahra: 35°31'53.0"N 51°22'35.4"E.

⁴⁹ Rastyad Collective, "The 1981 Massacre in Iran: Appendix," appendix IV, <https://rastyad.com/en/appendices> (accessed 10 March 2022).

different human rights organizations. During our fieldwork, we also identified and documented two demolished mass graves (sections 41 and 93) within Tehran's cemetery which contain the remains of thousands of political dissidents. To map the extent and scope of the massacre on a national level, we also analyzed more than 250 legal statements and press releases published in three major state-run newspapers: Jomhuri-e Eslami, Ettela'at, and Kayhan.⁵⁰ This archival analysis allows us to identify more than 2,800 political dissidents in eighty-five cities whose execution has been confirmed by the Islamic Revolutionary Courts, referring to show trials and summary executions.⁵¹ In view of this fieldwork and archival research, we have created an online database containing the personal details of more than 3,400 victims.⁵² The following table provides an overview of the number of verified executions per month, which offers the empirical basis of the central thesis of this article. [Figure 1](#)

Islamic Revolutionary Courts

The Islamic Revolutionary Courts are distinctive legal institutions that characterize the clerical nature of the Islamic Republic. As Entessar points out, these legal institutions evolved from *ad hoc* revolutionary tribunals that were brought into existence in the immediate aftermath of the Iranian revolution.⁵³ The first revolutionary tribunals were established by Khomeini a few days after the overthrow of the Pahlavi dynasty. These tribunals were led by Sharia judges (directly appointed by Khomeini) and their initial task was to punish state officials and military commanders of the *ancien régime* in accordance with "Islamic principles".⁵⁴ These tribunals lacked any coherent legal procedures, and their mandate was loosely defined. Nonetheless, these procedural deficiencies did not prevent Sharia judges from issuing death sentences for hundreds of state officials of the Pahlavi era within a few months.⁵⁵

What has remained unnoticed in Entessar's analysis is the process through which revolutionary courts transitioned from *ad hoc* tribunals to permanent legal institutions. According to the first Provision Concerning Revolutionary Courts and Tribunals (ratified by the Revolutionary Council on 17 June 1979), The Islamic Revolutionary Courts were *temporary* courts to maintain order during the exceptional circumstances of the

⁵⁰ In the period of June 1981 to March 1982, the names, and political profiles of more than 2,800 individuals—who were mostly executed by firing squad—appeared in different state-run newspapers on multiple occasions. These include official statements and press releases issued by the Islamic Revolutionary Courts, high-ranking judicial officers, and the Islamic Revolutionary Guard Corps (IRGC). The main rationale behind publishing these statements in the state-run media was not to reveal the truth, but rather to propagate how the regime would act against its critics.

⁵¹ See Rastyad Collective, "The 1981 Massacre in Iran: Appendix," appendix VII.

⁵² For the online database, see Rastyad Collective, "Online Database Relating to Victims of the 1981 Massacre," *Rastyad Collective*, <https://rastyad.com/> (accessed: 1 February 2022). This database consists of the following data: I) personal information about the executed person, II) their political affiliation, III) photographs of the gravestones (if available), IV) code numbers of the grave location, IV) an extract from a state-run newspaper where the name of the victim is mentioned (if available). Additionally, we created a virtual cemetery on Google Maps, making use of geolocation techniques. This virtual cemetery provides an accurate geographic position of victims' grave locations in Behesht-e Zahra.

⁵³ Nader Entessar, "Criminal Law and the Legal System in Revolutionary Iran," *Boston College Third World Law Journal* 8, no. 1 (1988): 91-102; Nicholas Nikazmerad, "A chronological survey of the Iranian Revolution," *Iranian Studies* 13, no. 1-4 (1980): 327-368.

⁵⁴ Ruhollah Khomeini, *Şahîfeh-ye Imâm: An Anthology of Imam Khomeini's Speeches, Messages, Interviews, Decrees, Religious Permissions, and Letters* (vol. 6) (Tehran: The Institute for Compilation and Publication of Imâm Khomeini's Works, 2008), 150.

⁵⁵ Entessar, "Criminal Law and the Legal System in Revolutionary Iran," 91-102; Nikazmerad, "A Chronological Survey of the Iranian Revolution," 327-368.

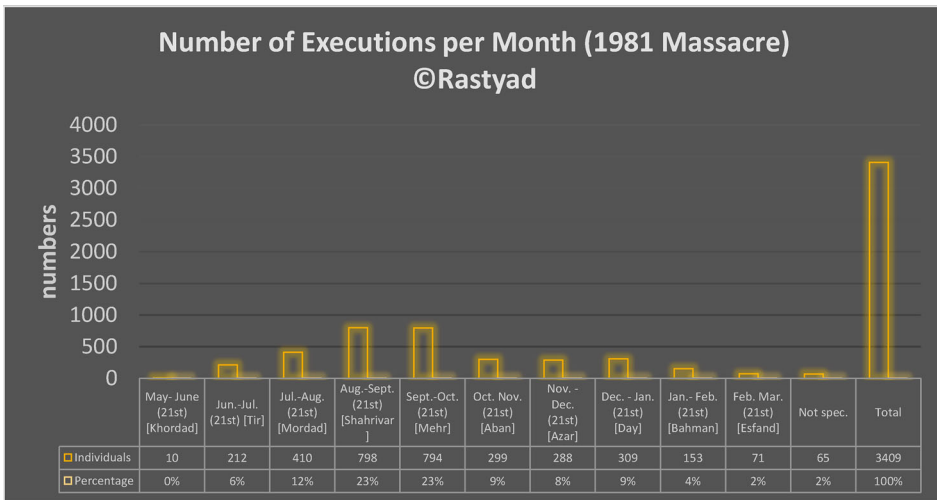


Figure 1. The following graph offers an overview of the verified executions per month.¹²⁸

revolution.⁵⁶ The Provision also intended to dissolve these temporary courts and replace them with a new system of courts.⁵⁷ Despite this initial intention, the Islamic Revolutionary Courts were gradually incorporated into the criminal justice system of the Islamic Republic.

In fact, revolutionary courts and tribunals were effective juridico-political bodies for shifting the balance of power so that it was advantageous for Shi’a clerics and their supporters. Since June 1979, Islamic Revolutionary Courts acquired a more formal character and their jurisdiction was gradually established and expanded.⁵⁸ In 1981, these courts still had a semi-official character, and their legal practices were not recognized by most opposition groups.⁵⁹ After the massacre and the subsequent ratification of the 1982 Penal Code, Islamic Revolutionary Courts, officially, became a permanent judicial body within the criminal justice system. Therefore, the 1981 massacre marks the transitional period during which Sharia judges increasingly acquired unlimited discretion to institutionalize their conception of Islamic justice. Through their legal practices, statements, and verdicts, Sharia judges gave political meaning to vague religious notions such as “corruption on earth”, “waging war on Allah”, and “religious hypocrisy” and characterized their political adversaries using terms such as “hypocrites”, “enemies of Allah”, and “apostates”. These legal categories were later materialized in the 1982 Penal Code and constituted the foundations of the present-day Islamic criminal justice system.⁶⁰

⁵⁶ Council of The Islamic Revolution, “Provisions Concerning Revolutionary Courts and Tribunals, 17 June 1979” <https://rc.majlis.ir/fa/law/show/99447> (accessed 10 March 2022).

⁵⁷ *Ibid.*, article 3.

⁵⁸ *Ibid.*, article 2.

⁵⁹ Nikazmerad, “A Chronological Survey of the Iranian Revolution,” 355; Abrahamian, *The Iranian Mojahedin*, 53; Faghfour Azar and Nasiri, *The Repressed Voices of the Iranian Revolution*, 111-112.

⁶⁰ Said Amir Arjomand, *After Khomeini: Iran under his Successors*. (Oxford: Oxford University Press, 2012), 32; Reza Banakar and Keyvan Ziaee, “The Life of the Law in the Islamic Republic of Iran.” *Iranian Studies* 51, no. 5 (2018): 717-746.

A notable observation concerns the wide-ranging geographical scope of atrocities as well as the diversity of political/social groups that were targeted during the 1981 massacre. Press releases and official statements issued by Islamic Revolutionary Courts illustrate that these courts were fully functional in all corners of the country and acted as an effective legal tool for terrorizing critics and eliminating dissidents.⁶¹ The main task of these courts was to bring critical citizens into line with fundamentalist Islamic ideology.⁶² To that end, Sharia judges were permitted to use all available methods and enforce all kinds of punishment, such as flogging for drinking alcohol, stoning for adultery [*zina*], the death penalty for same-sex intercourse [*lavat*], and execution for waging war against Allah [*moharebeh*].⁶³ In a public declaration, Hossein Moussavi Tabrizi, the Attorney General of Islamic Revolutionary Courts, stated:

[...] It is an absolute religious necessity to exterminate all dissidents [*Moharebs*] who stand against the Imam [the Supreme Leader]. Their captives should be killed, and their wounded should be tortured to death. [...] Every person who does not follow the Imam [the Supreme Leader] and stands against the Islamic Republic should be executed.⁶⁴

In the same statement, Tabrizi ordered military officers and revolutionary courts to act mercilessly against political prisoners, warning that all “prosecutors who do not act decisively against dissidents will be punished”.⁶⁵ These statements illustrate the actual approach of the revolutionary courts which facilitated the mass execution of thousands of dissidents in more than eighty-five cities within a very short period. It should be noted that most Sharia judges of these revolutionary courts and other judicial and military officers were promoted to high-ranking positions in the judicial and political bodies of the Islamic Republic. Most are still serving as ministers, high-ranking judges, commanders of the Revolutionary Guards, members of the Assembly of Experts, and Expediency Discernment Council.⁶⁶

As Robertson, Akhavan and others have maintained, the Revolutionary Courts lacked all the elements of a fair trial.⁶⁷ First, according to the prevailing legal doctrine, ideological enemies of the clerical regime (*moharebs*) did not have the right to counsel (legal assistance) and were not allowed to be defended by a lawyer.⁶⁸ Secondly, official statements and press releases demonstrate that courts’ decisions were, in most cases, taken in show trials within a very short period, without collecting or providing any of the necessary evidence for indicting suspects before a court.⁶⁹ In some cases, these courts have convicted unidentified individuals and sentenced them to death without even knowing

⁶¹ See Rastyad Collective, “The 1981 Massacre in Iran: Appendix,” appendix VIII.

⁶² Gilani, “Who is a Mohareb under the Islamic Law?” 7.

⁶³ These judicial practices were later codified and adopted by the Iranian parliament on 12 October 1982, see The Islamic Republic’s penal code (ratified in 1982), *Islamic Parliament Research Center (IPRC)*, https://rc.majlis.ir/fa/law/print_version/90591 (Accessed 1 December 2021), articles 196-211.

⁶⁴ All translations from the Persian sources are the responsibility of authors. For the original statement, see: Hossein Moussavi Tabrizi, “Those Prosecutors Who do not Act Decisively Against *Mufsid*s will be Punished [translated title],” *Jomhuri-e Eslami*, 20 September 1981, 11.

⁶⁵ *Ibid.*

⁶⁶ For a selected list of the alleged perpetrators, see Rastyad Collective, “Online Database Relating to Victims of the 1981 Massacre,” <https://rastyad.com/ameran/>

⁶⁷ Robertson, *The Massacre of Political Prisoners in Iran*; Akhavan, “Is Grassroots Justice a Viable Alternative to Impunity?”

⁶⁸ Hossein Moussavi Tabrizi, “Those Prosecutors Who do not Act Decisively Against *Mufsid*s will be Punished [translated title],” 11.

⁶⁹ General Assembly, *Report of Economic and Social Council, the Situation of Human Rights in the Islamic Report of Iran Note by the Secretary General* (2 November 1989), A/44/620, 29.

their real names.⁷⁰ Third, courts' judgments were based on forced confessions obtained under torture.⁷¹ During show trials, once the Sharia judge (*hakem-e shar'*) had the impression that the suspect might have a critical attitude towards the Islamic Republic, it was probable that the suspect would face the death penalty on charges of spreading "corruption on Earth" [*ifsad-fi-alarz*], "espionage", "terrorism", or "enmity against Allah" [*Moharebeh*].⁷²

It is worth considering that Islamic Revolutionary Courts made no distinction in terms of age, gender, or political affiliation. For a Sharia judge, it did not matter whether political suspects were men or women, socialists or liberals, active members of a political organization, or underage sympathizers. Based on official press releases and collected material, more than 370 of those killed were women. In Tehran, thirty-eight per cent of identified female dissidents were teenagers, most of whom were high school students.⁷³ It has been reported that pregnant prisoners were subjected to physical torture and that some were executed while heavily pregnant.⁷⁴ According to first-hand narratives and personal testimonies, children of political prisoners were often used as hostages to exert psychological pressure on mothers during interrogation sessions.⁷⁵ The following chart offers an overview of the command hierarchy in 1981. This information is based on the first Constitution of the Islamic Republic, which was adopted in December 1979.⁷⁶ Figure 2

Enemy of Allah

Official records and empirical data attest that the Iranian government characterized all its political opponents—consisting of dozens of political parties and organizations—as *moharebs*, *mufsid*s, counterrevolutionaries (*zedd-e enghelab*), hypocrites (*munafiq*), terrorists, apostates (*murtad*), or pro-Western mercenaries (*mozdur-e gharb*). For the same reason, state-sponsored violence against the opposition did not have a single target. Rather, this violence was meant to eradicate a large part of the political spectrum (representing different ideologies and worldviews) that could pose a threat to the state's hegemony.⁷⁷ This included communists, Mujahedin-e Khalq (the largest opposition group), socialists, social democrats, nationalists, liberals, monarchists, ethnic minorities,

⁷⁰ For example, on 12 June 1981, Tehran's Islamic Revolutionary Court confirmed the execution of five individuals whose identities were, according to court's statement, unknown to the judge, see The Islamic Revolutionary Court of Tehran, "Names of 15 Executed Counterrevolutionaries [translated title]," *Jomhuri-e Eslami*, 23 June 1981, 3; Also, see Rastyad Collective, "The 1981 Massacre in Iran: Appendix," appendix VIII.

⁷¹ The following video material offers first-hand impression of the nature and actual functioning of revolutionary courts. Revolutionary trial of eight leading members of the Baha'i community, *BBC Persian*, December 1981, <https://www.youtube.com/watch?v=93jtzWpV4G4> (accessed: 1 December 2021). For the complete version, see <https://www.youtube.com/watch?v=TXbWoBVYbbI>

⁷² The Islamic Republic's Penal Code (ratified in 1982), article 196.

⁷³ For the grave locations and personal details of female dissidents, see Rastyad Collective, "Online Database Relating to Victims of the 1981 Massacre," <https://rastyad.com/beheshtzahra/>

⁷⁴ Monireh Baradaran, "Plain Truth [Haghighat-e Sadeh]," (Iran Archive, 1996), 66, <https://iran-archive.com/sites/default/files/2021-09/monire-baradaran-haghighate-sadeh-eslaah.pdf> (Accessed 1 December 2021).

⁷⁵ "Iran's Survivors to Recall Horrors in The Hague at Tribunal", *Iran Tribunal*, 15 October 2012, <https://irantribunal.com/sessions/court/irans-survivors-to-recall-horrors-in-the-hague-at-tribunal/> (accessed 1 December 2021); Prosecutor v Islamic Republic of Iran, Iran Tribunal, An International People's Tribunal, (5 February 2013), para 92, <https://irantribunal.com/wp-content/uploads/2019/08/Iran-Tribunal-Judgment.pdf> (accessed 1 January 2022).

⁷⁶ The Assembly of Experts for Constitution, "Constitution of the Islamic Republic of Iran", ratified in 3 December 1979.

⁷⁷ Ali Khamenei, "Friday Prayer Speech, 26 June 1981"; Hossein Moussavi Tabrizi, "Those Prosecutors Who do not Act Decisively Against *Mufsid*s will be Punished [translated title]".

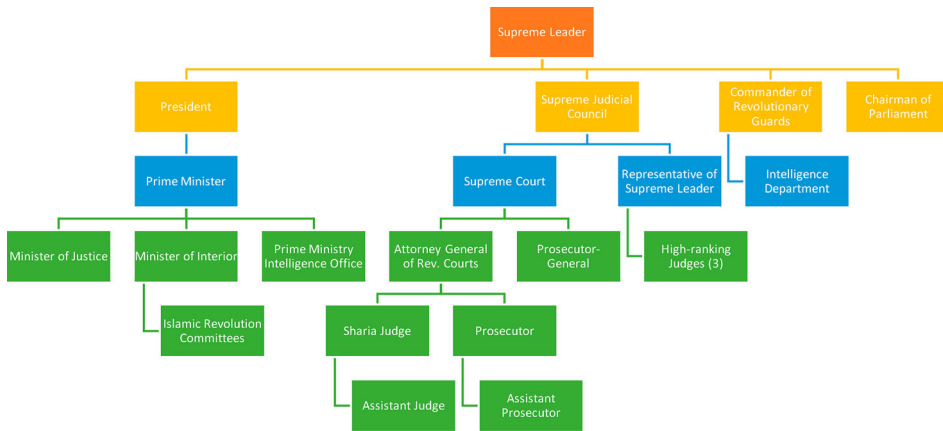


Figure 2. The following chart offers an overview of the chain of command in 1981.

and even followers of the Bahá'í Faith. Since the 1980s, hundreds of thousands of Iranian citizens who sympathized with one of these political ideologies or worldviews have been subjected to arbitrary detention, numerous types of torture, execution, long-term imprisonment, and forced exile.⁷⁸ Figure 3

In the first Constitution of the Islamic Republic ratified in 1979, the phrase “Islamic guidelines” was mentioned as a general criterion, which all social institutions should respect and according to which public affairs must be administered.⁷⁹ This theocratic approach to law and politics is rooted in Khomeini’s theory of *velayat-e faqih* (guardianship of the Islamic Jurist). As Khomeini claims, the Islamic government and its ruling Imam represent Allah and his prophet on earth. The Islamic state is built on the religious and political legacy of prophet Mohammad who is regarded as “the only true messenger to pass the laws of Allah onto people and implement them on earth”. On this interpretation, the Islamic state is the continuation of the sole example of “just governance” on earth and derives its legitimacy from divine sources. Since the governing laws of the Islamic state represent the laws of Allah, the Imam is entitled to enforce them accordingly.⁸⁰

Khomeini’s theory of *velayat-e faqih* was very controversial among the secular intelligentsia and has also been contested by notable Islamic scholars since the advent of the Iranian revolution.⁸¹ However, the idea of *velayat-e faqih* was incorporated by the Islamic clerics in the 1979 Constitution. As Saffari points out, The Assembly of Experts

⁷⁸ General Assembly, *Report of Economic and Social Council*; The United Nations High Commissioner for Refugees (UNHCR), “Background Paper on Refugees and Asylum Seekers from Iran”, (Geneva: United Nations, 1995); The United Nations High Commissioner for Refugees (UNHCR), “Background Paper on Refugees and Asylum Seekers from the Islamic Republic of Iran” (Geneva: United Nations, 2001).

⁷⁹ The Assembly of Experts for Constitution, “Constitution of the Islamic Republic of Iran”, ratified in 3 December 1979, preamble and principles 2-5. According to Principle 12 of the constitution, the “official religion of Iran is Islam and the Twelver Ja’fari school [in usual al-Din and fiqh], and this principle will remain eternally immutable.” Since the adoption of this Constitution, the Twelver Ja’fari school has gradually become the official doctrine for determining the practical meaning and dominant interpretation of general Sharia principles.

⁸⁰ Rouhollah Khomeini, “*Velayat-e Faqih: Governance of the Jurist*”, (Tehran: The Institute for Compilation and Publication of Imām Khomeini’s Works, 1970): 20–21 and 25.

⁸¹ Mahmoud Taleghani, Shi’a scholar and one of the leaders of the Iranian revolution, was perhaps the most prominent critic of Khomeini’s theory of *velayat-e faqih* and his interpretation of Sharia law. Michael M. J. Fischer, “The Rhythmic Beat of the Revolution in Iran,” *Cultural Anthropology* 25, no. 3 (2010): 497-543. Also, see Hamid Enayat, “Iran: Khomeini’s Concept of the Guardianship of the Jurisconsult”, in *Islam in the Political Process*, ed. James Piscatori,

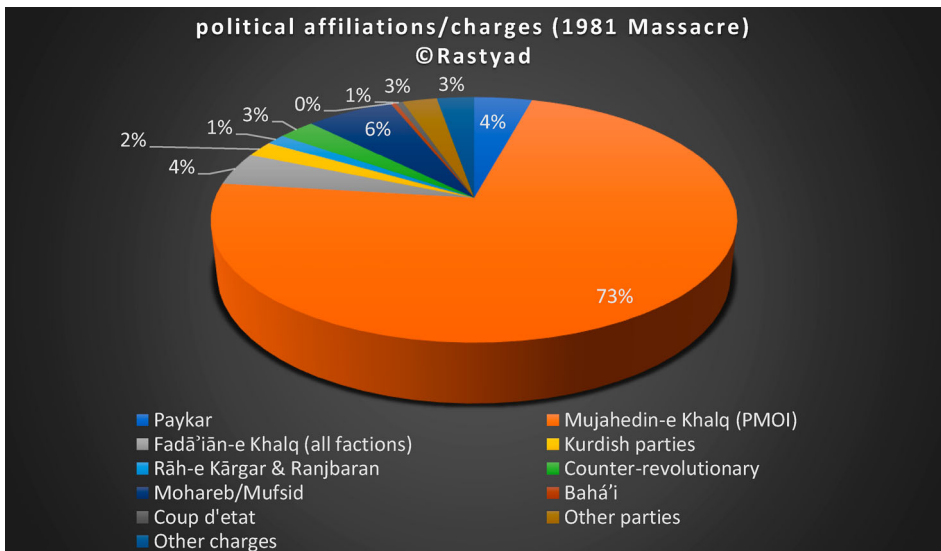


Figure 3. The following graph offers an overview of the political affiliations, allegations, and charges upon which the execution of more than 3,400 dissidents during the 1981 massacre was based.

for Constitution (*majles-e khebreghan ghanun-e asasi*), which was overrepresented by clerics and Khomeini’s supporters, played a prominent role in this process. The systematic exclusion of political opponents and non-clergies from this Assembly facilitated the gradual institutionalization of the concept of *velayat-e faqih* in the post-revolutionary political system.⁸²

The doctrine of *velayat-e faqih* implies that anyone who threatens the sovereignty of the Islamic state is, *eo ipso*, an enemy of Allah and his divine order.⁸³ This was precisely the rationale behind labelling political opponents as *mohareb* and *mufsid fi-alarz* during the 1981 massacre. *Moharebs* and *mufsids* are the enemy figures of the clerical rule that pose a threat to the divine order. They are considered “corrupt” forces that should be outlawed and eliminated. Under the mainstream Shi’a doctrine of criminal justice, revolt against the Islamic government is a crime that deserves capital punishment.⁸⁴ According to this doctrine, rebellious acts of *moharaebeh* and *ifsad fi-alarz* target Allah, Islam, and the prophet and his legitimate representatives. Therefore, they must be punished on an absolute and unmitigable ground.⁸⁵ In fact, neither Sharia

(New York: Cambridge University Press, 2010); Also see Said Amir Arjomand, *The Shadow of God and the Hidden Imam* (Chicago: University of Chicago Press, 2012).

⁸² Said Saffari, "The Legitimation of the Clergy's Right to Rule in the Iranian Constitution of 1979," *British Journal of Middle Eastern Studies* 20, no. 1 (1993): 64-82; Faghfour Azar and Nasiri, *The Repressed Voices of the Iranian Revolution*, 53-57.

⁸³ Ebrahim Akbarian, Seyyed Bagher Seyyedi Bonabi, and Rahim Vakilzadeh, "Ancient Investigation of the Privileges of Iran and Islam in Relation to the Limit of Moharebeh," *Medical History*, 343 (2020): 347-348.

⁸⁴ This interpretation is based on a Quranic verse. See Qur'an 5:33.

⁸⁵ According to dominant Shi’a doctrine, rebellious acts against an Islamic government fall under one of the main four categories of crimes and punishment, as specified in the Qur’an in terms of *Hudud*. *Hududs* are specific crimes, and their punishment is defined by the Qur’an. By this interpretation, Islamic judges have no discretion to mitigate punishments when it comes to criminal acts that fall under *hudud*. See Mohsen Rahami, "Islamic Restorative Traditions and Their Reflections in the Post-Revolutionary Criminal Justice System of Iran," *European Journal of Crime, Criminal Law, and Criminal Justice* 15, no. 2 (2007): 230-231.

sources nor the post-revolutionary provisions of the Islamic Republic had provided clear definitions of these punishable charges before and during the 1981 massacre. Moreover, it is worthy of consideration that notable disagreements existed among Sharia scholars (*fuqaha*) concerning the concrete meaning and applicability of religious concepts in present-day contexts. Some Islamic scholars even contested their political relevance and provided metaphysical or allegorical interpretations of the Qur'anic terms *mohareb* and *musfid-fi-alarz*.⁸⁶

From a legal point of view, Khomeini's vision on *mohareb*, which amounted to the elimination of dissidents in the 1981 massacre, had no legal grounding. On the one hand, his interpretation of Sharia sources was still not codified in the criminal justice system. On the other hand, due to the absence of the category of *mohareb* in the laws of the former regime, the Islamic state could not proceed any indictment by way of retroaction. According to Iran's former criminal law on national security, which was ratified in 1931 during Pahlavi era, "rebellious acts or organizing revolt against the ruling monarchy and/or national sovereignty" was conceived of as a crime against national security. The alleged perpetrators of such crimes were tried by military courts which had a secular character.⁸⁷

The absence of reliable legal provisions and undisputed interpretations of Sharia sources created a legal vacuum. This legal vacuum characterizes the law-constituting power of violence, as manifested in the 1981 massacre. In this legal vacuum, Sharia judges of Islamic Revolutionary Courts had to rely on loosely defined guidelines and far-fetched religious ideas. Statements of revolutionary courts suggest that acting judges adopted contested interpretations of *moherebeh* and *ifsad-fi-alarz* to justify the elimination of their political opponents. At the same time, these *ad hoc* practices encouraged Sharia judges to formulate the scope of meaning and application of these religious concepts. For example, in an opinion piece published in the state-run newspaper *Jomhuri-e Eslami*, Gilani (the influential Sharia judge of the Islamic Revolutionary Court of Tehran) offers a legal interpretation of the term *mohareb*. In doing so, he invokes the etymological root of the Arabic word *harb* ("to wage war") to define this yet unknown legal category. In view of Khomeini's commentary on Shi'a sources (in *Tahrir al-Wasileh*), he concludes that *mohareb* is "anyone who bears a weapon or facilitates others in bearing a weapon, by which he terrorizes the people and spreads corruption on earth." Accordingly, a *mohareb* must be punished by death.⁸⁸

Evidently, this interpretation lacks the minimum legal certainty and clarity that is required to determine the constitutive or *chapeau* elements of a crime. However, contrary to the foundational principle of *nullum crimen, nulla poena sine lege*, the widespread judgements of revolutionary courts created *de facto* grounds to define *mohereb* and *mufsid-fi-alarz* as legally recognized enemy figures of the Islamic state. These definitions were later incorporated in the Islamic Penal Code of 1982 and were formulated as distinct legal categories. This Penal Code was the immediate product of violent practices that took place during the 1981 massacre. A year after the mass killing of dissidents, the 1982 Islamic Penal Code specified ten concrete acts to establish the *actus reus* element

⁸⁶ Mahmoud Taleghani was a prominent representative of this approach. Fischer, "The Rhythmic Beat of the Revolution in Iran,".

⁸⁷ Shahin Nasiri, "Hybrid Violence and the Law of the Despot [*Khoshunat-e Dorag-e va ghanun-e yekke farmanravayan*]," *Pecritique* 14 (2020): 65-76.

⁸⁸ Gilani, "Who is a Mohareb under the Islamic Law?"

of the crime of *moharebeh*.⁸⁹ The Penal Code used the terms *moharebeh* and *ifsad-fi-alarz* interchangeably in several articles.⁹⁰

By incorporating these new legal categories into the Penal Code, the clerical rule was equipped with a unique legal tool by which it normalized its theocratic juridico-political order. Notably, six years after the ratification of the Penal Code, Khomeini invoked the concept of *mohareb* in his *fatwā* to legitimize the mass execution of political prisoners in 1988.⁹¹ While *moharebeh* had no official legal status in 1981, it was fully normalized in the criminal justice system during the 1988 massacre. Moreover, the concepts of *ifsad-fi-alarz* and *moharebeh* served as foundational categories in later developments of the Penal Code of the Islamic Republic of Iran in 1991 and 2013.⁹² Since 1981, these categories have been deployed to characterize ideological adversaries and critics instead of defining the constitutive elements of unlawful acts or omissions that could bring harm to society or public order.⁹³ In this sense, the elimination of political opponents in 1981 exemplifies an essential characteristic of the current political system in Iran, which outlaws every individual or group that cultivates a critical attitude towards it.

Mass Killings in Tehran

At 534 hectares, Behesht-e Zahra is the largest cemetery in Iran. It was built more than half a century ago in the southern part of Tehran. In view of our findings, we suggest that the remains of identified individuals—who were executed between June 1981 and March 1982—have been buried in five different sections of this cemetery, namely sections 41, 85, 87, 91, and 92.⁹⁴ These sections are informally termed “sections of executed dissidents” [*ghat-e edamiha*].⁹⁵ Each has its own characteristics. While sections 87 and 92 are the resting places of most dissidents executed in that period, section 85 embodies a mass grave in which more than 300 individuals (including unidentified people) were buried in an area smaller than 1,500 m². Section 91 seems to have been reserved for those killed in February and March 1982, just before the Iranian new year (*Nowruz*). These sections also contain the remains of at least fifty-nine dissidents who were executed during the second wave of the mass killings that took place in the summer of 1988, also known as the 1988 massacre.⁹⁶ However, the most enigmatic section is section 41, which represents one of the largest demolished mass graves in Iran. The following table offers an overview of identified victims in five sections in Behesht-e Zahra:

⁸⁹ Accordingly, anyone committing them could be subject to minimum punishment of three-year imprisonment to a maximum punishment of death. The Islamic Republic’s Penal Code (ratified in 1982), Arts. 1-6, 10, 12, 14, 88 and 126.

⁹⁰ *Ibid.*, Arts. 88 and 126.

⁹¹ Montazeri, *Montazeri Diaries*, 623-625;

⁹² The Islamic Republic’s penal code (ratified in 1991), Islamic Parliament Research Center (IPRC), <https://rc.majlis.ir/fa/law/show/99619> (Accessed 3 July 2022); The Islamic Republic’s penal code (ratified in 2013), Islamic Parliament Research Center (IPRC), <https://rc.majlis.ir/fa/law/show/845048> (Accessed 3 July 2022).

⁹³ See the Islamic Republic’s Penal Code (ratified in 1991) Art. 183 and the Islamic Republic’s Penal Code (ratified in 2013) Arts. 279 and 286.

⁹⁴ For the geographical location of these sections, see Rastyad Collective, “Online Database Relating to Victims of the 1981 Massacre,” <https://rastyad.com/maps/>

⁹⁵ See Rastyad Collective, “The 1981 Massacre in Iran: Appendix,” appendix IV and VI.

⁹⁶ For the personal details of identified victims of the 1988 massacre, see Rastyad Collective, “Online database relating to victims of the 1981 Massacre,” <https://rastyad.com/beheshtzahra/>

Table 1: Section	Identified victims (1981 massacre)	Victims executed in other periods
41	11	Possibly thousands from early 1980–1981, of which 18 have been identified and documented
85	279	5 in 1988; other periods unknown
87	281	37 in 1988; other periods unknown
91	51	15 in 1988; at least 13 after March 1982; other periods unknown
92	359	2 in 1988, at least 3 after March 1982; other periods unknown
Total	981	58 in 1988; 41 in other periods

The cemetery has an online database that visitors could use to locate the exact burial places of their relatives.⁹⁷ This database stores the personal records (including geographic coordinates) of nearly 1.7 million individuals who have been buried in the cemetery since the early 1970s. Initially, one might think that this database could also be a useful tool for locating the tombstones of political dissidents. However, the opposite holds true. By exploring numerous search queries and keywords, it can be observed that most personal records (more than eighty-six per cent) relating to political dissidents have been entirely removed from the cemetery's official database. While only fourteen per cent of the names are traceable on the database, these data are often inadequate and contain various errors and inaccuracies relating to names, dates, and coordinates. These errors can be established by comparing online data with information inscribed on gravestones.⁹⁸ This finding supports the claim that the Iranian government has systematically and deliberately tried to cover up the facts concerning this large-scale massacre to avoid legal, political, and moral accountability.⁹⁹ Figure 4

Execution of Youth and Minors

One of the most significant facts about the 1981 massacre could be highlighted by categorizing the collected material in view of the ages of the executed dissidents. The highest percentage of executions between June 1981 and March 1982 was of individuals aged eleven to twenty-four. Notably, seventy per cent of all victims buried in Tehran's cemetery belonged to this age group. The great majority of these young activists were either high school students or had recently graduated from top universities in Iran and abroad. More importantly, our data reveals that more than ten per cent of all victims were minors; that is, under the age of eighteen. The youngest male and female victims—Amrollah Kordi-Loo (1970-1981) and Elaheh Mohabbat (1965-1981)—were, respectively, eleven and fifteen years old when Iranian authorities executed them on religiously motivated charges of *moharebeh* and “sympathizing with hypocrites [Mujahedin-e Khalq].”¹⁰⁰ In Iran's capital city, at least 100 adolescents were subjected to arbitrary detention, brutal torture, and summary executions on charges of *moharebeh*

⁹⁷ For Behesht-e Zahra's online database, see <https://beheshtezahra.tehran.ir/default.aspx?tabid=92>

⁹⁸ For grave locations and personal details of identified dissidents who were buried in Behesht-e Zahra, see Rastyad Collective, “Online Database Relating to Victims of the 1981 Massacre,” <https://rastyad.com/beheshtzahra/>

⁹⁹ Robertson, *The Massacre of Political Prisoners in Iran*; Akhavan, “Is Grassroots Justice a Viable Alternative to Impunity?,”; Guterres, *Report of the Secretary-General of the United Nations*, 5; Rehman, *Report of the Special Rapporteur of the Human Rights Council*, 5.

¹⁰⁰ For the personal profile of Kordi-Loo, see Rastyad Collective, “Online Database Relating to Victims of the 1981 Massacre,” <https://rastyad.com/kordi/>; For the personal profile of Mohabbat, see Rastyad Collective, “Online Database Relating to Victims of the 1981 Massacre,” <https://rastyad.com/mohabbat/>.

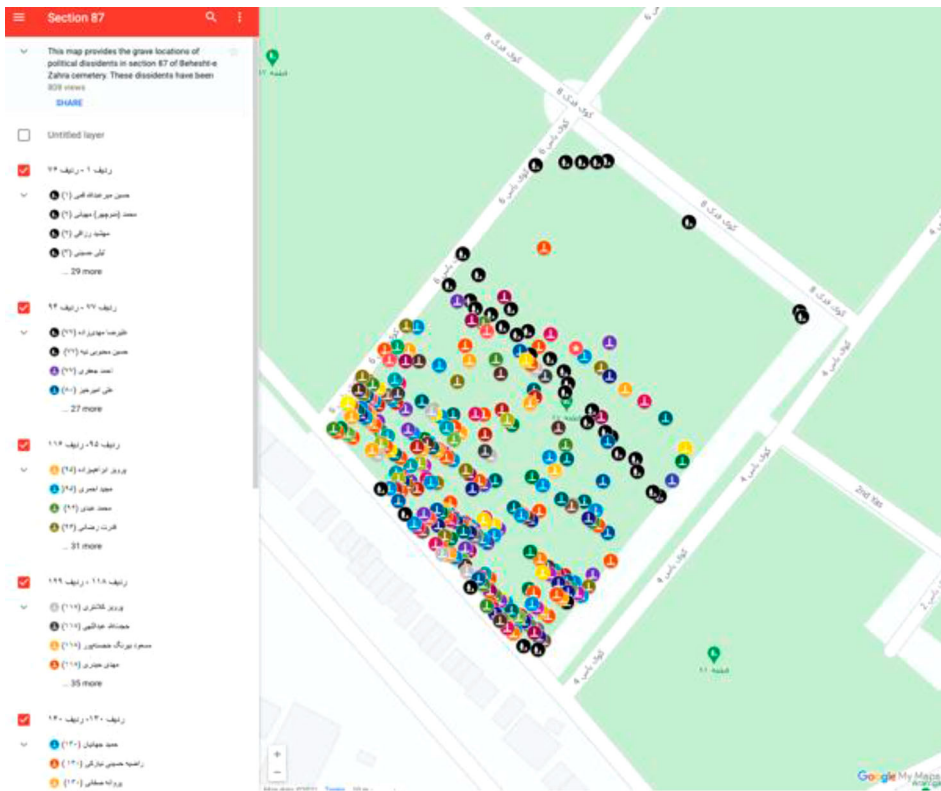


Figure 4. The following map offers geographic coordinates of 318 graves of political dissidents in section 87, Behesht-e Zahra.¹²⁹..

and *ifsad-fi-alarz*.¹⁰¹ It should be reiterated that these figures only account for a small fraction of the mass execution of minors that took place at the national level.¹⁰² **Figure 5**

In Iran’s modern social-historical context, the execution of minors was a highly unprecedented and controversial phenomenon.¹⁰³ According to Iran’s former Penal Code—which was ratified in 1973 during the Pahlavi era—all Iranian citizens aged between 12 and 18 years were considered “minors” (*atfal*).¹⁰⁴ Minors were exempted from full criminal liability and their offences were subject to legal investigation by the Iranian Juvenile Court. The verdicts of this court had, in essence, a corrective and rehabilitative purpose. The maximum penalty for juvenile offenders was incarceration for eight years in a reformatory institution.¹⁰⁵ In 1975, the Iranian state ratified the International Covenant on Civil and Political Rights (ICCPR) and officially announced that it had already

¹⁰¹ For a selected list of executed minors, see Rastyad Collective, “The 1981 Massacre in Iran: Appendix,” appendix II.
¹⁰² For a comprehensive list of identified minors in Behesht-e zahra, see Rastyad Collective, “Online Database Relating to Victims of the 1981 Massacre,” <https://rastyad.com/beheshtzahra/>
¹⁰³ Nadia Aghtaie and Jo Staines, “Child Execution in Iran: Furthering our Understanding of Child Execution as a Form of Structural Violence,” *Critical Criminology* (2022): 1-16.
¹⁰⁴ See Iran’s Penal Code (ratified by the Iranian Parliament on 28 May 1973), *Islamic Parliament Research Center (IPRC)*, Article 32, <https://rc.majlis.ir/fa/law/show/96940> (Accessed 1 March 2022).
¹⁰⁵ *Ibid.*, Article 33.

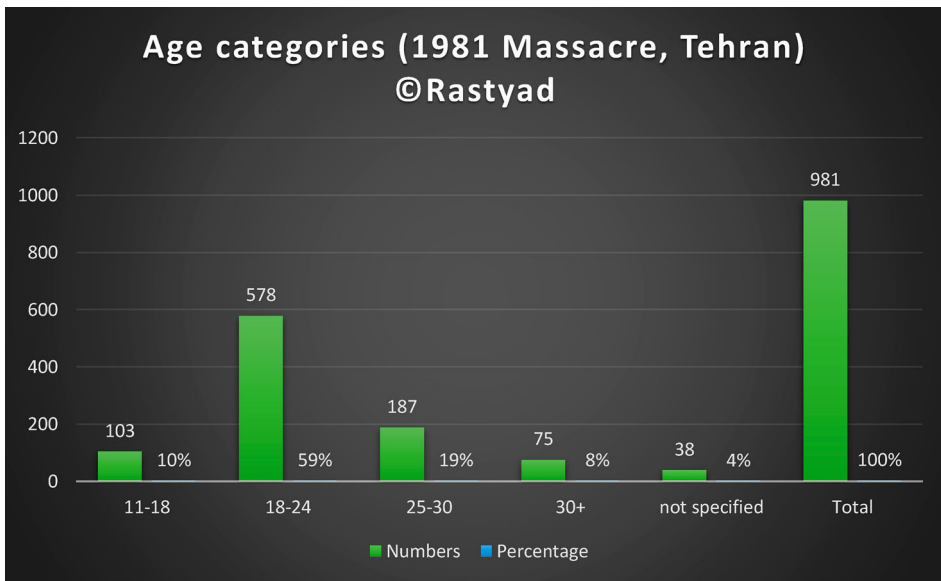


Figure 5. The following graph offers an overview of identified individuals buried in Behesht-e Zahra based on age categories.

prohibited “the death sentence for persons under 18 years of age” under all circumstances.¹⁰⁶

At the time of the 1981 massacre, there is no evidence that the post-revolutionary legislative or judiciary authorities had modified the legal definition of “minor” and the minimum age for “full criminal liability”. More importantly, the Islamic Republic remained party to ICCPR and was, *eo ipso*, committed to international prohibitions concerning the use of the death penalty against juvenile offenders. Viewed from this perspective, the mass execution of minors in 1981 had, by definition, no legal grounds whatsoever and manifestly violated applicable national and international legal standards. For this reason, the Iranian authorities did not officially admit juvenile executions and their representative to the United Nations refused to respond to the question “whether the death penalty was ever used [in 1981] in the case of persons under the age of 18”.¹⁰⁷

However, Sharia judges offered, in retrospect, justificatory grounds for juvenile executions for both political and non-political charges. To this end, they invoked Khomeini’s orthodox doctrine that the age of maturity under Islamic Sharia is not in conformity with the internationally accepted norms concerning the definition of criminal liability. On Khomeini’s interpretation, Islamic sources prescribe girls and boys reach the stage of maturity at the age of nine and fifteen (lunar years) respectively. Although some Islamic scholars—most notably Montazeri (Khomeini’s deputy in 1981)—disputed the adequacy of this interpretation, this doctrine served as a criterion for redefining the notion of criminal liability in the Islamic Penal Code that was ratified in the aftermath of the 1981

¹⁰⁶ UN. Human Rights Committee, *Yearbook of the Human Rights Committee, 1977-1978. Volume 1, Summary Records of The Meetings of the 1st to the 5th sessions*, 252, para. 8.

¹⁰⁷ UN document A/37/40, paras. 308, 326.

massacre.¹⁰⁸ Accordingly, the 1981 massacre played a vital role in the legal normalization of juvenile executions. The execution of juveniles on charges of *moharebeh* and *ifsad-fi-alarz* showcases the Islamification of the criminal system concerning the minimum age of criminal liability.¹⁰⁹ It represents the transition from international standards and norms on juvenile justice to orthodox readings of Sharia law. Over the past few decades, juvenile executions have become common practice for both political and non-political charges. At present, the Islamic Republic ranks at the top of the list of reported juvenile executions worldwide.¹¹⁰

Mass Graves and Unidentified Victims

During our field research, we documented dozens of tombstones on which the term “unidentified” [*gomnam*] was inscribed. Numerous graves were unidentifiable since they either lacked a tombstone or were demolished by government forces.¹¹¹ In our archival research, we observed that the Iranian officials had, in many cases, systematically refused to hand over the remains and personal belongings of victims to their families.¹¹² To locate the graves of their loved ones, families were often forced to pay a large sum of money to different governmental bodies, or they had to bribe local officials. At present, it remains undecided and uncertain whether the remains of the victims are buried in the designated graves. This mystery could only be resolved by verifying the identity of the dead, for which DNA samples from (unidentified) individuals should be collected and analyzed.¹¹³

Concerning the (still) unknown dimensions of the massacre, two additional observations are worthy of consideration. First, our field data show that the execution of a significant number of identified victims in the city of Tehran were not officially confirmed by the revolutionary courts. As such, these cases were not publicly announced in press releases and official statements of judiciary authorities. According to survivors’ accounts, many of their fellow-prisoners were executed in absolute secrecy, and their family members were, for months, unaware of their fate.¹¹⁴ This pattern seems to apply to the mass killing of dissidents in other cities. Secondly, archival analysis concerning the publication pattern of judiciary statements suggests that from October 1981, Iranian

¹⁰⁸ For Montazeri’s objection, see Hussein Ali Montazeri, “Letter to Ayatollah Khomeini Concerning the Shortcomings of the Supreme Judicial Council, 27 September 1981”, <https://amontazeri.com/book/khaterat/volume-2/1065> (accessed 1 March 2022); Islamic Republic’s Penal Code (ratified in 1982), Article 26; also, see Ciprian-Vasile Maftai, “The Sanctions of the Islamic Criminal Law. Aspects Regarding Penalties of The Criminal Law of The Islamic Republic of Iran. Religion and Tradition vs. Observing Human Rights,” *Curentul Juridic, The Juridical Current, Le Courant Juridique* 3 (2010): 139-148; Mahmood Monshipouri, *Inside the Islamic Republic: Social Change in Post-Khomeini Iran* (Oxford: Oxford University Press, 2016), 103-104.

¹⁰⁹ The Islamic Republic’s Penal Code (ratified in 2013), Arts. 140 and 147.

¹¹⁰ For an analysis of current legal practices relating to juvenile executions, see Nadia Aghtaie, and Jo Staines, “Child Execution in Iran: Furthering our Understanding of Child Execution as a Form of Structural Violence.”

¹¹¹ See Rastyad Collective, “The 1981 Massacre in Iran: Appendix,” appendix V.

¹¹² In this regard, see United Nations Economic and Social Council (ECOSOC), *Preliminary Report by the Special Representative of the Commission, Mr. Andrés Aguilar, appointed pursuant to resolution 1984/54, on the human rights situation in the Islamic Republic of Iran*, 1 February 1985. UN Doc E/CN.4/1985/20; General Assembly, *Report of Economic and Social Council*, 14.

¹¹³ This material could, for example, be gathered and documented by excavating the graves in an independent forensic investigation under supervision from an internationally recognized truth committee.

¹¹⁴ For various accounts provided by the survivors of the 1981 and 1988 massacre and relatives of victims, see Mohajer, *Voices of a Massacre*.

authorities had changed their media strategy and reduced their public announcements to exceptional cases. Consequently, it could be maintained that the total number of executions were significantly higher than those presented in state-run newspapers, although it is very difficult to make an accurate estimate about the actual scope of the massacre.¹¹⁵

Arguably, the most unsettling part of our study concerns the discovery of two demolished mass graves in Behesht-e Zahra, namely sections 41 and 93. We found that sections 41 and 93, which serve as the burial ground for hundreds of dissidents, have been completely demolished. Section 41 is a desert-like site of approximately 1.3 hectares, which contains dying trees, destroyed gravestones, improvised grave markers, as well as ruins and fragments of tombstones scattered over the entire section. Section 93 appears to be even more enigmatic. The destroyed part of this site (eighty per cent of the total area) has an area of approximately 1.6 hectares.¹¹⁶ This section resembles a salt desert and seems to have been bulldozed. Drawing on different archival and empirical data, it could be maintained that many political dissidents (possibly thousands)–executed between 1980 and August 1981–were buried in section 41. It could also be stated that section 93 contains the remains of hundreds (if not thousands) of dissidents executed between 1982 and 1988. Comparative analysis with respect to the estimated capacity of different sections in Behesht-e Zahra indicates that sections 41 and 93 could contain between 5,000–7,000 graves each. Given that available space is in high demand in this densely occupied cemetery, there is no reason to assume that local authorities did not exhaust the full capacity of these sections for hiding the bodies of their political opponents. [Figures 6 and 7](#)

It is still unclear when government officials decided to turn these mass graves into ruins. Satellite imagery and historical data obtained from Google Earth indicate that the general condition of these burial sites has slightly deteriorated since 2002.¹¹⁷ Still, the actual destruction of sections 41 and 93 seems to have taken place decades before. At present, both sections are heavily controlled and monitored by local authorities and surveillance cameras. The Iranian authorities do not allow the families of victims to mourn in these burial sites and the identity of most individuals buried in these sections remains unknown. Since the early 1980s, the Iranian government has, systematically, demolished mass graves across the country that were intended for the burial of the executed dissidents. As Robertson, Mohajer and others have suggested, these practices aim to annihilate all documents and resources that could serve as potential evidence. At present, the Iranian authorities continue to conceal the actual scope of this massacre to avoid legal accountability.¹¹⁸

Apart from the question of accountability, mass graves have three intertwined symbolic functions for the clerical rule. First, the creation of mass graves and desecration of gravestones serve as a method for the consolidation of state power. As Ferrándiz and Robben observe, mass graves are sophisticated technologies of terror that are

¹¹⁵ Also, see Mohajer, *Voices of a Massacre*, preface.

¹¹⁶ See Rastyad Collective, "The 1981 Massacre in Iran: Appendix," appendix VI.

¹¹⁷ See Rastyad Collective, "The 1981 Massacre in Iran: Appendix," Appendix VI.

¹¹⁸ Robertson, *The Massacre of Political Prisoners in Iran*, 79–82; Mohajer, *Voices of a Massacre*, 15; Prosecutor v Islamic Republic, Iran Tribunal, para 3 and 168; Rehman, *Report of the Special Rapporteur of the Human Rights Council*, 5; Guterres, *Report of the Secretary-General of the United Nations*, 5.



Figure 6. Section 41 (left: satellite view)¹³⁰ **130** Geographic coordinates of Section 41, Behesht-e Zahra: 35°32'06.9"N 51°22'32.0"E

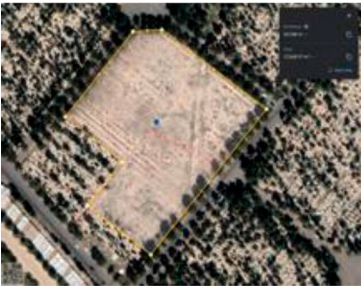


Figure 7. Section 93 (Left: satellite view)¹³¹ **131** Geographic coordinates of Section 93, Behesht-e Zahra: 35°31'36.1"N 51°22'10.9"E

instrumental in bringing about a regime of fear that could last for decades.¹¹⁹ Mass graves symbolize the decisive victory of the theocratic power over its internal enemies. For totalitarian states, mass graves create spatial zones that embody the physical, social, and spiritual eradication of the enemy figure from the public realm.¹²⁰ Second, desecration of gravestones signifies the final stage of the dehumanization process to which ideological enemies are exposed. Victims of mass atrocities are not political opponents in the conventional sense. Rather, they are depicted as absolute enemy figures whose life could be stripped of all its social, political, and spiritual qualities.¹²¹

For perpetrators, their ideological enemies were not critical citizens or political adversaries who, at least, deserved a dignified resting place. Executed political opponents were reified and labelled as evil forces that had waged war against Allah. The enemy figure of the Islamic theocracy (the *mohareb*) does not, simply, challenge a man-made juridico-political system. As Gilani states, a *mohareb* is at war with a predestined divine order that is being represented by Shi'a clerics. The *mohareb* is corrupting God's creation and should

¹¹⁹ Francisco Ferrándiz, Antonius C. G. M. Robben, and Richard Wilson, *Necropolitics: Mass Graves and Exhumations in the Age of Human Rights* (Philadelphia: University of Pennsylvania Press, 2015), 2.

¹²⁰ Antonius C. G. M. Robben, "Exhumations, Territoriality, and Necropolitics in Chile and Argentina," in *Necropolitics: Mass Graves and Exhumations in the Age of Human Rights*, ed. Francisco Ferrándiz and Antonius C. G. M. Robben (Philadelphia: University of Pennsylvania Press, 2015), 57.

¹²¹ Robben, "Exhumations, Territoriality, and Necropolitics in Chile and Argentina," 57.

"be eliminated from the society in the most disgraceful and humiliating way".¹²² As a result of this dehumanization process, political dissidents were treated as evil forces that could be exposed to harsh physical and psychological torture, systematic violence, and mass extermination. These dehumanized enemies are subjected to mass extermination on an industrial scale as if they were non-humans.¹²³ The executed opponents were not supposed to be mourned by their survivors as martyrs or heroes.¹²⁴ To deny their humanity even long after their death, their dead bodies were dumped, as reified objects, in abandoned graves or piled up in (unknown) mass graves.¹²⁵

Thirdly, ideological enemies represent an alternative vision of how society could be organized and ruled. Moreover, executed political opponents could be viewed as representatives of active resistance against oppression and injustice. Their material traces and life stories could serve as a source of inspiration for future generations to challenge the status quo.¹²⁶ For this reason, their very presence in collective memory poses a threat to state ideology that propagates the totalitarian unity of the leader, religion, and the people. Consequently, the rationale behind the destruction of mass graves is to terrorize and demoralize potential critics and to erase all traces and signs of political resistance from collective memory.¹²⁷

Conclusion

The 1981 massacre could be considered the most extensive atrocity committed by the Iranian government. Although the actual extent and scope of this massacre is still undetermined, we have verified the identities of more than 3,400 individuals who were executed between June 1981 and March 1982. Drawing on empirical evidence and archival material, three key observations are worthy of consideration. Firstly, most political dissidents were sentenced to death by the Islamic Revolutionary Courts immediately after being arrested. These courts, which were active in more than eighty-five cities across the country, systematically violated the right to fair trial of their suspects. Secondly, during the 1981 massacre, hundreds of minors were subjected to arbitrary detention, torture, and

¹²² Gilani, "Who is a Mohareb under the Islamic Law?" 7.

¹²³ Balibar, *Violence and Civility: On the Limits of Political Philosophy*, XIV; Agamben, *Homo Sacer: Sovereign Power and Bare Life*, 68; also, see Isaias Rojas-Perez, "Death on Display: Bones and Bodies in Cambodia and Rwanda," in *Necropolitics: Mass Graves and Exhumations in the Age of Human Rights*, ed. Francisco Ferrándiz and Antonius Robben (Philadelphia: University of Pennsylvania Press, 2015), 221.

¹²⁴ Chowra Makaremi, "State violence and death politics in post-revolutionary Iran," in *Destruction and human remains: Disposal and concealment in genocide and mass violence*, ed. Anstett Élisabeth and Dreyfus Jean-Marc (Manchester: Manchester University Press, 2014), 190.

¹²⁵ See also Mehrdad Amanat, "Set in Stone: Homeless Corpses and Desecrated Graves in Modern Iran," *International Journal of Middle East Studies* 44, no. 2 (2012): 257-283.

¹²⁶ In this regard, see Ehsan Amin-Roaya, *The Massacre: Rethinking the Oligarchy of Power [Ghatl-e am van Bazshenasiy-e Oligarshi-ye Ghodrat]* (Paris: Rezayi Foundation Press, 2019), 36.

¹²⁷ Balibar, *Violence and Civility: On the Limits of Political Philosophy*, 131; Robben, "Exhumations, Territoriality, and Necropolitics in Chile and Argentina," 59; Also, see Veda Hyunjin Kim, "Subimperialism and Perpetual Necropower: Foundational Violence and Mnemonic Self-killing on Jeju Island, 1947–Present." *Journal of Genocide Research* (2022): 1-24.

¹²⁸ It should be noted that all numbers, statistics, and graphs presented in this report are based on data that were collected and analyzed in June 2021. For the most recent data, see *ibid*.

¹²⁹ For the virtual cemetery, see Rastyad Collective, "Online Database Relating to Victims of the 1981 Massacre," <https://rastyad.com/maps/>

¹³⁰ Geographic coordinates of Section 41, Behesht-e Zahra: 35°32'06.9"N 51°22'32.0"E

¹³¹ Geographic coordinates of Section 93, Behesht-e Zahra: 35°31'36.1"N 51°22'10.9"E

summary executions on ideologically motivated charges of *ifsad-fi-alarz* and *moharebeh* by the revolutionary courts. Although these courts acted in a legal vacuum, their judgments provided the factual ground to substantiate new legal categories that were materialized in the first Islamic Penal Code, ratified a year after the 1981 massacre. Thirdly, over the past few decades, the Iranian authorities has systematically and deliberately tried to cover up the actual extent and scope of the 1981 massacre through different practices and tactics. These practices include the destruction of mass graves of political dissidents, distortion of historical data, and active harassment of survivors and family members of the victims.

As the foregoing analysis makes clear, the 1981 massacre epitomizes how mass political violence could serve as a constitutive element in establishing a totalitarian juridico-political order. In the legal sense, the mass killing of political opponents enabled the regime to impose its theocratic vision on the notion of justice by categorizing its ideological adversaries as enemies of Allah and religious outlaws. Moreover, this massacre helped clerics in giving shape to their oppressive legal apparatus by institutionalizing the Islamic Revolutionary courts. For more than four decades, this legal apparatus functioned as an essential pillar in safeguarding and consolidating states' hegemonic power. In the political sense, the mass killing of political dissidents was instrumental in shifting the balance of power to the advantage of the clerics and their supports. The theocratic regime secured its political survival by silencing, expelling, and eliminating thousands of intellectuals, academics, artists, poets, and young students. In the symbolic sense, the creation and destruction of mass graves symbolize the decisive victory of the state over its secular opponents. This symbolic victory was rendered possible by the physical, political, and spiritual eradication of all traces of resistance from the collective memory. In sum, the manifestation of state violence during the 1981 massacre embodies the fundamental characteristic of a political system that has built its foundations upon the disintegrated bodies and ruins of its political others.

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No potential conflict of interest was reported by the author(s).

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