

All Eyes on Iran's Bloody Crackdown

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Death toll by the thousands

As a professor of Public International Law, I have always emphasized to my students that *jus cogens* are peremptory norms. Any law student would easily know that these norms should never be derogated. At least this is what the *Vienna Convention on the Law of Treaties* provides.^[1]

Is it possible that *Ayatollah Ali Khamenei*, the Supreme Leader of Iran, missed this chapter in his international law books? My speculation emanates from the fact that his regime began a crackdown on protesters over the last few weeks, which is estimated to have resulted in 25,000 deaths, according to a report issued by a Norway-based Iran Human Rights organization. However, the organization has documented 3,428 cases as of January 22, 2025.^[2] These numbers are far more alarming compared to the 550 confirmed deaths from the protests arising from the death of *Mahsa Amini*^[3] in 2022.

Nationwide Internet Blackout

The increasing death toll surfaced online despite the internet blackout implemented by the Iranian government in all areas of Iran. Yes, a nationwide internet blackout. Take note, this is different from the incompetence of your local internet service provider; this is a deliberate effort from the Iranian government to deprive internet connection from its citizens of internet connection since January 8, 2026.^[4]

So, let's break this information down. *Iranians protest on the streets. A nationwide internet shutdown. A rising death toll in the cities where the protests took place.*

From an international law point of view, it is imperative that we inquire as to “what compelled the Islamic Republic of Iran to commit these atrocities?”

Now, from a lawyer asking the right questions, such as myself, the more important question is “what compelled the Iranians to risk their lives by participating in protests against the *Ayatollah*?”

The Iranian Rial currency predicament

On January 16, 1979, the political structure of Iran changed drastically. The former Shah of Iran, *Mohammad Reza Pahlavi*, was ousted and left the country during the Islamic Revolution^[5] led by *Ruhollah Khomeini*. From being an Iranian monarchy, Iran shifted to a

[1] Article 53, Vienna Convention on the Law of Treaties, 1969

[2] See: Protests in Iran: Official casualty figures in doubt by: Shabnam von Hein Available at: <https://www.dw.com/en/protests-in-iran-official-casualty-figures-in-doubt/a-75642949>

[3] See: Mahsa Amini's Death: What You Need To Know. by: Erin Pedersen Available at: <https://www.womensvoicesnow.org/mahsa-amini>

[4] See: Iranians struggle as internet shutdown hits livelihoods. by: France 24 Available at: <https://www.womensvoicesnow.org/mahsa-amini>

[5] See: What Led to the 1979 Iranian Revolution? by: Nate Barksdale Available at: <https://www.history.com/articles/1979-iranian-revolution-causes>

form of government run by Shia Islamic clerics and imposed anti-Western policies. The long-lasting effects of these policies paved the way to turning Iran into a global pariah, an outcast in the international community.

This political overhaul led to adverse economic consequences; the most chaotic of these events took place during the *US Embassy Hostage Crisis* in the city of Tehran, the capital of Iran. ^[6] On April 7, 1980, former United States President Carter cut diplomatic ties with Iran and announced economic sanctions.

Several economic sanctions later, the Iranian Rial Currency suffers a sharp decline. One US Dollar amounted to 817,000 Iranian Rials, which leads to hyperinflation in the prices of basic commodities. In effect, the ordinary Iranian with a minimum wage job would be forced to resort to “bread-only meal” diets. Such is the daily struggle of the Iranian people; some are forced to change their diet due to the fluctuation of the Iranian Rial currency.

It must be noted as well that there are those living above minimum wage, who can afford a higher standard of living, and yet they are not immune to the urge of wishing a better economic condition. The tipping point finally arrives when the exchange rate reaches 1.42-1.47 million Iranian Rials for every one US Dollar by late 2025. ^[7]

Protest begins, massacre followed suit

In the last few days of December 2025, the aggrieved merchants started demonstrations in Tehran’s Grand Bazaar. Eventually, the protests soon spread to other major cities, where the people chanted slogans against the Supreme Leader.

The people chanted “Death to Khamenei,” ^[8] a phrase that could have legal ramifications and, oftentimes, a death sentence. This phrase is a call to end the Supreme Leader’s 35-year rule, which was encouraged by Reza Pahlavi, the son of the former Shah, Mohammad Reza Pahlavi, in an attempt to restore the monarchical form of government that once ruled Iran for 2,500 years since Cyrus the Great.

As much as the Iranian protesters wanted to show the world their struggle online, the Iranian government had other plans. On January 8, 2026, the 12th day of the nationwide protests, the internet blackout began. What followed was an alleged military crackdown on protesters, which occurred during the first two days of the internet blackout. And in that short span of time, an estimated 12,000 people have been killed, although the documented cases were more or less 3,000. ^[9] Allegedly, all of these atrocities were carried out on the direct order of the Supreme Leader.

[6] See: Iran Hostage Crisis Fast Facts by: CNN Editorial Research Available at: <https://edition.cnn.com/world/middleeast/iran-hostage-crisis-fast-facts>

[7] See: EXPLAINER - Rising prices, falling currency: Iran’s economy faces rocky road by: Mucahithan Avcioglu Available at: <https://www.aa.com.tr/en/economy/explainer-rising-prices-falling-currency-iran-s-economy-faces-rocky-road/3800027#:~:text=Due%20to%20the%20rial's%20sharp,and%20some%20430%2C000%20in%202022.>

[8] See: “Death to Khamenei”: What we know about Iran’s protests by: Saeid Jafari Available at: <https://www.newstatesman.com/international-politics/2026/01/death-to-khamenei-what-we-know-about-irans-protests>

[9] See: At least 12,000 killed in Iran crackdown during internet blackout Available at: <https://www.iranintl.com/en/202601130145>

Illegal Arrests, enforced disappearances

No less than Amnesty International received reports of Iranian Authorities deployed to impose curfews and to prevent any gatherings.^[10] A heavy military presence aimed at suppressing dissent also led to illegal arrests of individuals conducted inside their homes and enforced disappearances. The victims range from children to university students.

In his YouTube vlog^[11], Arab (Addison Pierre Maalouf), a content creator, was able to record his personal experience in Tabriz, Iran, during the internet blackout. In his video, he was surrounded by 10 members of the Iranian Secret Service while he was vlogging. His phone and cameras were searched for any incriminating photos or videos. He was able to prove that he was not recording any videos of the heavy military presence in Tabriz; all they could find were videos of him eating in restaurants and checking in at his hotel. It was only then that the Iranian Secret Service members released him.

Death toll rises

As of January 25, 2026, Human Rights Activists News Agency (HRANA),^[12] the US-based news agency for Human Rights Activists in Iran, issued a report confirming 4,519 deaths at the beginning of the week; this number does not include the other 9,000 cases under investigation.^[13] If we ask Iran International, it is estimated that more than 36,500 Iranians in 400 cities were killed by security forces during the January 8-9 crackdown on nationwide protests. This data is in accordance with the classified documents reviewed by Iran International's Editorial Board.^[14] Two Iranian health officials provided data from civilian hospitals, which corroborated the reported numbers. While there may be disparities in the death toll reported by various sources, one thing is clear: there is evidence to support the claim that the Iranian Authorities must be held accountable for the deaths of protesters, documented or otherwise.

Crimes against humanity under the Rome Statute

In light of the aforementioned reports of death, illegal arrests, and disappearance of certain individuals, the evidence to support violations under the Rome Statute, particularly Crimes against humanity under Article 7(1) (a)^[15] in committing murder, Article 7 (1) (e) severe deprivation of liberty in violation of international law, Article 7 (1) (h) persecution against any identifiable group on political grounds, Article 7 (1) (i) in facilitating enforced disappearances of persons, as part of a widespread or systematic attack directed against any civilian population is overwhelming.^[16]

[10] See: Iran: Authorities unleash heavily militarized clampdown to hide protest massacres Available at: <https://www.amnesty.org/en/latest/news/2026/01/iran-authorities-unleash-heavily-militarized-clampdown-to-hide-protest-massacres/>

[11] See: I Don't Trust the Western Media, So I Went to Iran by: Arab Available at: <https://www.youtube.com/watch?v=ZljBEyDKQkg>

[12] See: What is HRANA, the US-based group behind Iran's death toll figures? by: Sarah Shamim Available at: <https://www.aljazeera.com/news/2026/1/15/what-is-hrana-the-us-based-group-behind-irans-death-toll-figures>

[13] See: Protests in Iran: Official casualty figures in doubt by: Shabnam von Hein Available at: <https://www.dw.com/en/protests-in-iran-official-casualty-figures-in-doubt/a-75642949>

[14] See: Over 36,500 killed in Iran's deadliest massacre, documents reveal Available at: <https://www.iranintl.com/en/202601255198>

[15] See: Article 7 (1) (a), Rome Statute, International Criminal Court, p. 3

[16] See: Article 7 (1) (e), (h), (i), Rome Statute, International Criminal Court, p. 4

The evidence, gathered from video recordings, reports from human rights organizations, news agencies, and first-hand accounts of victims, supports the allegations that the crimes mentioned above were committed by the Islamic Republic of Iran through its military, as a part of a widespread or systematic attack directed against the protesters, most of whom are part of the civilian population. All of which are carried out upon the behest of the Ayatollah against the protesters, who were targeted solely based on their political identity, particularly by fighting for a change in the political structure of Iran.

Forecast on the change in leadership

Assuming arguendo that the current Supreme Leader will be ousted, or in the unlikely event that he will be summoned to appear in a Nuremberg-like trial, answering charges for crimes against humanity, be it in the International Criminal Court, will this guarantee another political restructuring of Iran?

I came up with several scenarios that are not far from reality.

The first scenario, which leans towards succession, depicts Iran under the rule of *Mojtaba Khamenei*, the second eldest son of the Supreme Leader. Will this be received favorably by the supporters of the Supreme Leader?

Remember that the former Shah of Iran, Mohammad Reza Pahlavi, was ousted and disliked because of the monarchical system, which automatically vested power in him without the participation of the electorate. To mirror this system would defeat the very essence of the Islamic Revolution that was grounded upon removing the Shah. On second thought, there is nothing that could stop the clerics from resorting to means of preserving the theocratic form of government they have today.

The next scenario would be a *de facto military dictatorship*. The Islamic Revolutionary Guard Corps (IRGC) has gained so much economic and military power, as is made apparent in their killing and suppression of protesters on a large-scale. The military takeover of Iran would be swift, once the Supreme Leader has stepped down or is captured.

The last scenario that comes to mind is the United States under the Trump administration finally waging war against the existing regime. Afterwards, the installation of the son of the former Shah, *Reza Pahlavi*, as King of Iran takes place. As to whether the use of nuclear weapons could be a possibility on both sides is something that should not surprise us.