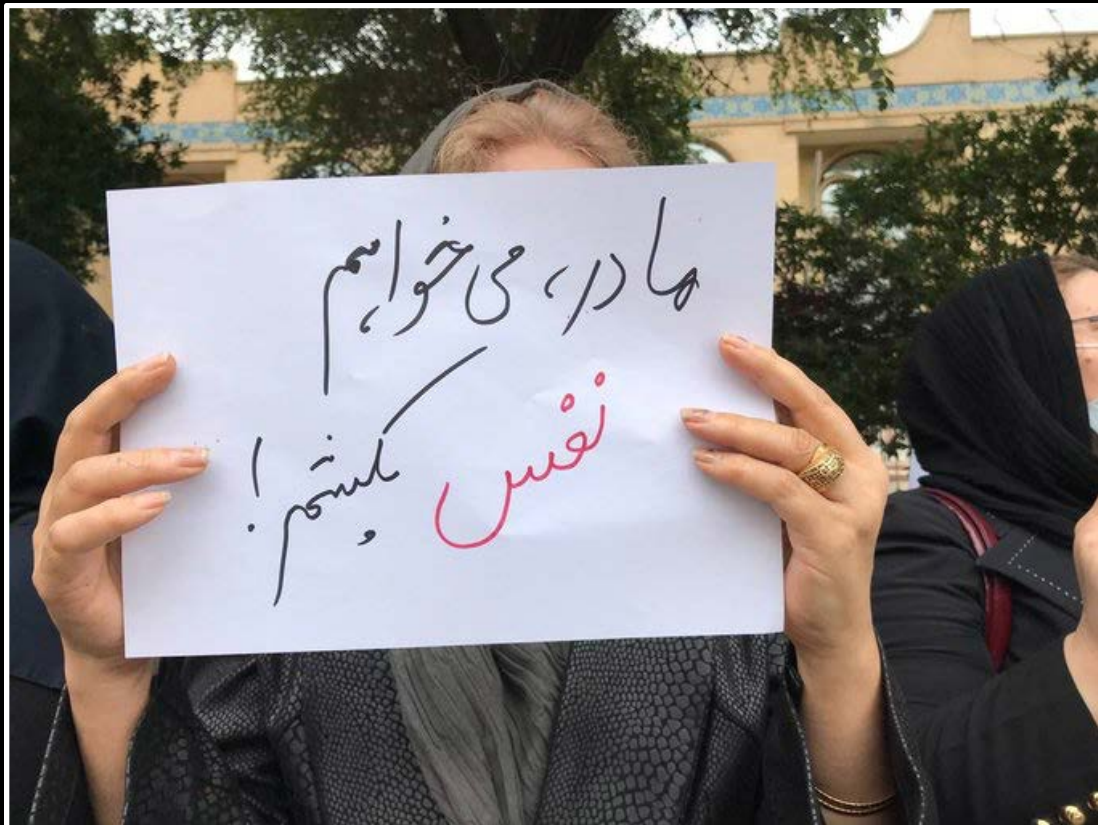


# SCHOOL POISONINGS IN IRAN: AN OPEN-SOURCE INVESTIGATION



“Mother, I want to breathe!”

*In partnership with:*

**Stanford** | Hamid and Christina Moghadam  
Program in Iranian Studies

**AZADI  
ARCHIVE**

<sup>1</sup> Source: @begoonah1, X (Mar. 7, 2023) <https://twitter.com/begoonah1/status/1633179047915028480>.

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<sup>2</sup> See *Launching the Iranian Archive to Support Future Accountability Efforts*, MNEMONIC <https://mnemonic.org/en/news/launching-the-iranian-archive-to-support-future-accountability-efforts> ("An Archive forensically preserving open source digital information").

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# INTRODUCTION

On November 30, 2022, in the midst of protests in Iran under the “Woman, Life, Freedom” movement, schoolgirls at Noor Conservatory Girls’ School in Qom City experienced a bizarre and terrifying event while at school. They smelled “poisonous gas,” and experienced symptoms that sent 18 of them to the hospital.<sup>3</sup> Days later, several of them were still experiencing symptoms, including paralysis from the waist down and difficulty walking. Local officials claimed the girls simply had cramps caused by stress. Then, two weeks later, the same thing happened again at Noor, and girls once again went to the hospital for symptoms from respiratory poisoning.

Through May 2023, there were hundreds of these reported poisoning incidents at schools around the country, the vast majority of them at girls’ schools. Videos circulated on social media depicting girls coughing, vomiting, and struggling to walk in front of their schools. Yet at the same time, contradictory information undermined the validity of these videos, claiming they were fake or else alleging that the poisonings were psychological, and the girls’ symptoms were caused by their own fear or anxiety. Eventually, the Iranian government concluded in its own investigation that the vast majority of the alleged poisoning incidents were actually caused by girls’ anxiety or hysteria.

There continues to be uncertainty about whether there were intentional uses of airborne chemical agents (which we refer to in this report as “poisoning incidents”) in Iranian schools in 2022-2023 during the “Woman, Life, Freedom” movement. Our team, a collaboration between international law experts, Iran experts, and open-source researchers, investigated open-source information about alleged poisonings in Iran to answer three questions:

- (1) did poisoning incidents occur in Iranian schools during this time?
- (2) how did Iranian officials address and respond to the poisoning incidents?
- (3) what are international legal responsibilities of Iranian government officials in light of these incidents and the government’s responses?

We found open-source evidence that schoolgirls in Iran experienced real symptoms and that those symptoms were likely caused by something that was physical rather than psychological, and we are doubtful that the vast majority of episodes were the result of anxiety or mass hysteria.<sup>4</sup> We also found that although Iranian officials acknowledged publicly that something had occurred and in some cases attributed the incidents to poison, they nevertheless downplayed the girls’ symptoms, prevented information about the incidents from spreading, failed to take safety precautions to prevent future incidents, and failed to properly investigate or provide evidence-supported explanations for what happened. We find that Iran violated several of its obligations under international human rights law in light of this response to the poisoning incidents, either under a theory of direct responsibility, where the poisoning incidents were

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<sup>3</sup> [\*Latest status of the students poisoned in Qom / The Provincial Department of Education is following up on the matter\*](#), ISNA (Dec. 12, 2022) (Doc. 287\_14).

<sup>4</sup> See *infra* Part III.B(iv), discussing the flaws with mass hysteria as the explanation for the poisoning incidents in Iran.

attributable to an organ or agent of the Iranian government or, alternatively, under a theory of due diligence, under which Iran failed to ensure respect for its human rights obligations by failing to prevent these incidents or provide effective remedies to victims.

This Report will proceed as follows. Part I details thirteen likely poisoning incidents, compiled into individual case files of open-source materials. This Part then provides a summary of the odors and symptoms affected girls reportedly experienced and a brief overview of possible toxic agents based on these trends. Part II discusses the Iranian government's response. This includes how officials and state-affiliated news agencies publicly discussed the poisoning incidents over time, as well as actions officials took in response, including actions taken right after incidents occurred and follow-up investigations pursued. Part III analyzes the government's response under international law, assessing whether Iran violated its international human rights obligations on account of the poisoning incidents. Part IV walks through possible accountability pathways in light of this legal assessment.

This Report, although detailed, is far from comprehensive, and a few caveats are in order. First, our case files are a small fraction of the total reported school poisoning incidents from November 2022 through May 2023. There were hundreds of additional poisoning incidents during this time. Unfortunately, we did not have the resources to investigate all of them, and as such, we focused on a small number of reported incidents instead (more on how we selected these cases below, in Part I.A, which discusses our methodology). Second, while we did our best to confirm the open-source multimedia evidence in our case files (the process of which is summarized in Part I.A and further detailed in Annex A), our methods for doing so are not foolproof, and should not be interpreted as such, including not treating them as equivalent to authentication within a court of law. Third, we did our best to include reporting by state-affiliated news outlets in Iran, with the notion that relying on reporting the government itself considers credible provides an opportunity to understand the government's response on its own terms. In doing so, however, we do not mean to imply that these sources are paramount to truth. In light of this, we included alternative domestic media outlets in Iran to the extent we identified them, to provide alternative details and perspectives about the poisoning incidents.

Finally, we relied exclusively on open-source information, meaning we used only material that had been published for public consumption. There are ethical challenges with this approach because we were not working directly with those affected, and their voices and experiences are not as centered in this Report as we would have liked them to be. In light of this, we do not advocate for specific legal actions to be taken, we only present a range of options. That's because those affected must be the leaders of any justice discussions or efforts. We hope this Report may serve to amplify their experiences without speaking for them, and helps ensure their experiences are not forgotten.

## PART I: CASE FILES

There were hundreds of reported poisoning incidents in schools across Iran starting on November 30, 2022 and continuing through at least May 2023.<sup>5</sup> We did not have sufficient resources to go through all reported incidents. Instead, we examined a handful, and focus in this report on details for thirteen such incidents. Below, we detail our methodology for identifying cases and establishing a baseline level of trust in the evidence identified. Then, we provide a detailed narrative for each of the thirteen incidents based on the evidence collected for each case file, including what happened, what symptoms girls experienced and odors reported, and what Iranian government officials said and did in response to that specific incident. Following the case file summaries, we lay out several possibilities for the toxic agent that could have been used. In doing so, we provide contrary evidence to the Iranian government's assertion that these incidents were caused by mass hysteria or "non-toxic agents" (e.g., tear gas or pepper spray).

### A. Our Methodology

As a starting point, our team relied on the work of Dr. Mahmoud Azimaei, who compiled an open-source list of every reported incident of alleged intentional poisonings of schoolchildren (predominantly, though not exclusively, girls) in Iran.<sup>6</sup> We sorted this spreadsheet by the number of reported injuries during each incident and investigated each case with reported injuries over 50. We supplemented this research by randomly sorting the spreadsheet and selecting 5 additional cases to examine. We also identified one incident through our research that was not included in Azimaei's spreadsheet. In total we compiled case files for 32 incidents. Access to all of our case files is available upon request. We did not confirm every incident Dr. Azimaei compiled in his spreadsheet, nor was that our intention.

Out of these original 32 case files, we selected 13 case files that had strong evidence indicating the incidents occurred. These 13 case files were selected because they had at least one video documenting the incident that we could geolocate and at least 3 reliable reporting sources that confirmed the incident occurred. All but one case file has at least one report about the incident from an Iran-based news outlet, and every incident before April 9, 2023, includes multiple reports from state-affiliated news outlets, which our team prioritized, given the state's demonstrated effort to downplay or deny these incidents.<sup>7</sup> State-affiliated news outlets are those

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<sup>5</sup> See Mahmoud Azimaei, *Schools' Poison Tracker* <https://sites.google.com/view/poison-tracker/english?authuser=0> (detailing 448 reported incidents); *26 provinces and 245 schools were involved in the poisoning/Security forces said no trace of foreign agents was found/We covered up the case*, ROUYDAD24 (Mar. 17, 2023); *No deaths have been reported so far due to student illness/13,000 students have been discharged and treated*, TASNIM (Mar. 13, 2023).

<sup>6</sup> Mahmoud Azimaei, *Schools' Poison Tracker* <https://sites.google.com/view/poison-tracker/english?authuser=0>.

<sup>7</sup> The Iranian government appears to have prohibited reporting on alleged poisoning incidents on or around April 10, 2023. See Vahid Online X <https://x.com/Vahid/status/1645074730414665730> (reposting an order by the Press Supervision Board under the Ministry of Cultural Affairs to refrain from reporting on the poisoning incidents on April 10, 2023); see also *Suspected Poisonings Continue; Hengaw: Some Principals in Baneh Asked Students to Stay at Home*, RADIO FARDA (Apr. 11, 2023) <https://www.radiofarda.com/a/iran-school-poisoning-continues/32358701.html> (reporting on the state's announcement banning reporting on poisonings incidents at



we consider to be loosely connected to the government or the IRGC, or else other official state apparatuses. A full list of such outlets included in this report can be found in Annex B. The number of documents within each case file ranges from 12-36 per file, and the total number of supporting documents collected for all thirteen cases is 303. The cases included in this report are not intended to be representative of all poisoning incidents in schools reported in Iran during this time.

Many of the 32 cases we initially examined that we have not included in this report also include strong evidence that poisoning incidents occurred. Three have multimedia reports capturing girls experiencing symptoms at or in front of their schools and confirmation from domestic news outlets (both state and non-state) that the incidents occurred, but our team was unable to geolocate those videos. Nine more have strong support that the incidents occurred from domestic news outlets (both state and non-state affiliated) but had limited multimedia evidence capturing the incident itself. While excluded from this report, the evidence related to these cases supports the notion that the reported poisonings of schools in Iran were not one-off incidents, and that many similar incidents were occurring around the country at this time.

Every source we identified for this report's case files was collected through digital open-source information gathering. Our team combed through public social media accounts on X, Telegram, and Instagram, domestic and international news media reporting, and human rights organizations' reports, to identify evidence documenting these cases. The Azadi Archive was instrumental in helping identify such evidence, parsing through its digital multimedia materials compiled in Mnemonic's Iran Archive for any evidence relevant to our case files (both the Azadi and Mnemonic's Archive materials include only digital open-source information).<sup>8</sup>

Once case files were compiled, our team performed three types of digital evidence confirmation:

1. Geolocation, in which we cross-referenced visible features of each photo or video with at least one other photo or video of that location;
2. Time/Date Checks, based on EXIF metadata<sup>9</sup> pulled from each file (to the extent these data remained on the file), timestamp the video or photo was posted, and reverse image searches conducted; and
3. Reverse Image Searches, in which we searched for existing photos or stills from videos using Google Lens.

We used these techniques to establish a baseline level of trust in the digital evidence relied on in this report. Where confirmation techniques suggested a document is not relevant to a case, we excluded the document from the report, and where we were unable to confirm the location about

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schools and describing a seemingly unified reporting message by state media in prior days, using words like "lethargy").

<sup>8</sup> *Launching the Iranian Archive to Support Future Accountability Efforts*, MNEMONIC <https://mnemonic.org/en/news/launching-the-iranian-archive-to-support-future-accountability-efforts> ("An Archive forensically preserving open source digital information").

<sup>9</sup> EXIF metadata is information attached by a camera to photos and videos, typically including the date a photo or video was taken. See *Term: Exif*, FEDERAL AGENCIES DIGITAL GUIDELINES INITIATIVE <https://www.digitizationguidelines.gov/term.php?term=exif>. EXIF metadata is not foolproof and it can be removed from the image. See, e.g., *How to Remove Digital Metadata from Photos*, IONOS (June 6, 2023) <https://www.ionos.com/digitalguide/websites/web-design/removing-exif-data/>.



the digital content we either omitted it from this report or, if it is included, we note that the content remains unconfirmed. More detail regarding confirmation for each piece of evidence is logged in Annex A. Importantly, these confirmation techniques do not verify the contents of the multimedia, nor are they equivalent to legal authentication, a term that affirms to a court the evidence is what it purports to be.<sup>10</sup>

## B. Thirteen Likely Incidents of Student Poisoning

The case files our team compiled for this report strongly suggest that girls felt real physical symptoms during and after these incidents, casting serious doubt on the notion that these events did not happen. Our evidence also strongly suggests that the symptoms students experienced were not solely psychological. Instead, the evidence suggests that toxic agents were used in girls' schools across Iran, causing schoolgirls to experience a wide range of symptoms. Evidence from our case files further indicates that Iranian officials failed to take seriously the girls' suffering.

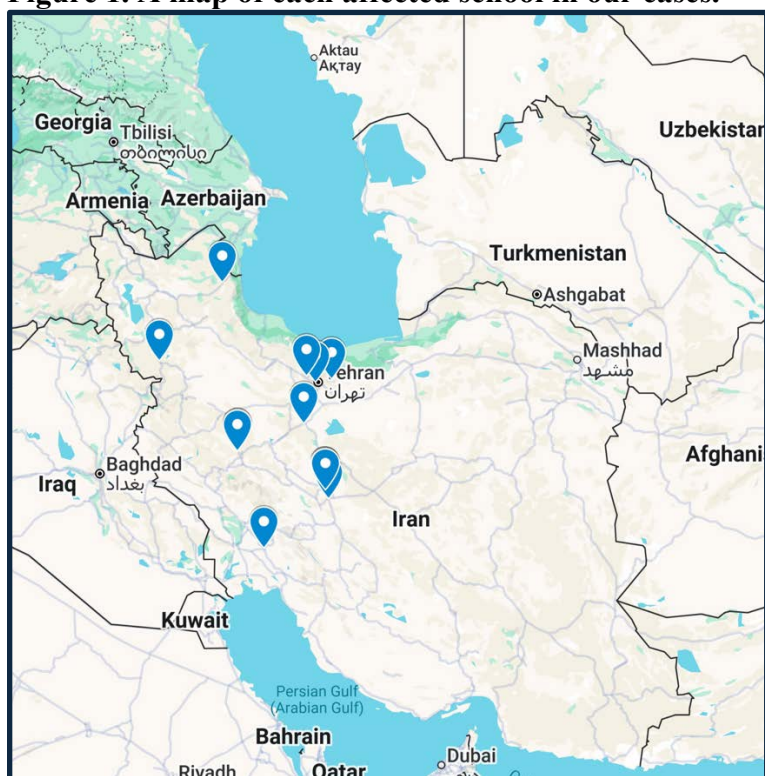
The case files capture events ranging from December 13, 2022, to April 11, 2023. Many of the cases we looked into occurred on the same day, or within a narrow time period, and some occurred in the same city. The cases included in this report are:

- December 13, 2022: Noor Vocational Girls' School, Qom City, Qom Province
- February 25, 2023: Ahmadiyya Girls' High School, Borujerd, Lorestan Province
- February 26, 2023: 15 Khordad Girls' High School, Borujerd, Lorestan Province
- February 28, 2023: Khayam Girls' High School, Pardis, Tehran Province
- March 1, 2023: 13 Aban Girls' Middle School, Tehranasar, Tehran Province
- March 5, 2023: Hazarat Zeyneb Girls' High School, Ramhormoz, Khuzestan Province
- April 8, 2023: Sema Girls' High School, Ardebil, Ardebil Province
- April 9, 2023: Ma'raj Girls' High School, Saqqez, Kurdistan Province
- April 10, 2023: Sadr Girls' High School, Karaj, Alborz Province
- April 11, 2023: Al-Yaseen Girls' Vocational School, Shahinshahr, Isfahan Province
- April 11, 2023: Talo' Girls' High School, Shahinshahr, Isfahan Province
- April 11, 2023: Ansari Girls' High School, Shahinshahr, Isfahan Province
- April 11, 2023: Shayan Girls' High School, Isfahan City, Isfahan Province

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<sup>10</sup> See, e.g., FED. R. EVID. 901(a).

**Figure 1. A map of each affected school in our cases.**



### December 13, 2022: Noor Vocational Girls' School, Qom City, Qom Province

Sometime in the late morning or the middle of the school day on December 13, 2022, girls in the Noor Vocational School in Qom began smelling something like “burnt wires” in their classroom.<sup>11</sup> According to one of the students, they left the classroom and went to a second one, but the gas spread there too.<sup>12</sup> Another student said that they were going to get their bags from upstairs but there was “gas like smoke” in every room in the school.<sup>13</sup> One student told the Iranian Student News Agency (ISNA), a state-affiliated news outlet,<sup>14</sup> that the school staff did not initially believe the students and refused to initially call emergency services,<sup>15</sup> although the principal disputed this, saying they immediately rang the bell and urged students into the

<sup>11</sup> *Poisoning of 51 students and staff of Noor Vocational School in Qom*, IRIB (Dec. 14, 2022) (Doc. 287\_01); *What did the poisoned students from Qom say about the repeated incident at Noor Technical School?* ISNA (Dec. 15, 2022) (Doc. 287\_19) (interviewing students in the hospital who said the incident began around 12:15 PM); *Most of the poisoned schoolgirls in Qom have been discharged from the hospital*, IRNA (Dec. 13, 2022) (Doc. 287\_22) (reporting that the “unpleasant odor” began at 11 AM).

<sup>12</sup> *Poisoning of 51 students and staff of Noor Vocational School in Qom*, IRIB (Dec. 14, 2022) (Doc. 287\_01).

<sup>13</sup> *Poisoning of 51 students and staff of Noor Vocational School in Qom*, IRIB (Dec. 14, 2022) (Doc. 287\_01). One student explained that unlike the first incident at Noor Vocational Girls' School, during this incident, the gas spread throughout the entire school. *What did the poisoned students from Qom say about the repeated incident at Noor Technical School?* ISNA (Dec. 15, 2022) (Doc. 287\_19).

<sup>14</sup> See Annex B for a full list of news outlets this report considers to be state-affiliated.

<sup>15</sup> *What did the poisoned students from Qom say about the repeated incident at Noor Technical School?* ISNA (Dec. 15, 2022) (Doc. 287\_19).

schoolyard.<sup>16</sup> Eventually school administrators called for emergency services, but only one ambulance reportedly arrived.<sup>17</sup> The students' parents were reported to have called for additional ambulances.<sup>18</sup> This was the second time in two weeks that the school had experienced a poisoning incident.<sup>19</sup>

A video made by the Islamic Republic of Iran Broadcasting (IRIB), Iran's state-owned national broadcaster, shows girls sitting down bent over or lying down, and one girl appearing to be having trouble walking.<sup>20</sup> In another video taken of what appear to be the same group of girls from a different angle, one of the girls can be heard yelling out in agony and breathing heavily.<sup>21</sup> In still another video, a girl can be seen getting dragged into an ambulance, her limbs completely immobile, appearing either unconscious or unable to move.<sup>22</sup> In an interview with the IRIB, one girl explains that "everyone had trouble breathing and could not feel their legs."<sup>23</sup> She lists other symptoms as "fatigue, lack of feeling in the body, and nausea."<sup>24</sup> Students still in the hospital a day later emphasized the numbness in their legs; one girl said she couldn't move her legs after the incident occurred, and two days later, could not walk without assistance.<sup>25</sup>



Source: *Poisoning of 51 students and staff of Noor Vocational School in Qom*, IRIB (Dec. 14, 2022) <https://www.aparat.com/v/t50llyp> (Doc. 287\_01).

51 students were sent to two hospitals in the area, along with an unspecified number of teaching staff, according to local and state-affiliated media reports.<sup>26</sup> State-affiliated media, along with

<sup>16</sup> *Most of the poisoned schoolgirls in Qom have been discharged from the hospital*, IRNA (Dec. 13, 2022) (Doc. 287\_22) (reporting the principal's rendition, who said they evacuated students "at the first opportunity").

<sup>17</sup> *Poisoning of 51 students and staff of Noor Vocational School in Qom*, IRIB (Dec. 14, 2022) (Doc. 287\_01).

<sup>18</sup> *Poisoning of 51 students and staff of Noor Vocational School in Qom*, IRIB (Dec. 14, 2022) (Doc. 287\_01).

<sup>19</sup> *Poisoning of 51 students and staff of Noor Vocational School in Qom*, IRIB (Dec. 14, 2022) (Doc. 287\_01); *Repeated poisoning of students at a girls' vocational school in Qom*, QOMNA NEWS (Dec. 13, 2022) (Doc. 287\_08); *The general condition of the students poisoned at a technical high school in Qom is good*, PANA News (Dec. 14, 2022) (Doc. 287\_09); *18 students were poisoned in Qom; all of them are in good condition*, ISNA (Nov. 30, 2022) (Doc. 287\_13).

<sup>20</sup> *Poisoning of 51 students and staff of Noor Vocational School in Qom*, IRIB (Dec. 14, 2022) (Doc. 287\_01).

<sup>21</sup> @qom\_ziba INSTAGRAM (Dec. 13, 2022) [https://www.instagram.com/qome\\_ziba/reel/CmHPM0ejf0C/](https://www.instagram.com/qome_ziba/reel/CmHPM0ejf0C/) (Doc. 287\_10).

<sup>22</sup> @ManotoNews, X (Dec. 13, 2022) <https://x.com/ManotoNews/status/1602644763014201345> (Doc. 287\_02).

<sup>23</sup> *Poisoning of 51 students and staff of Noor Vocational School in Qom*, IRIB (Dec. 14, 2022) (Doc. 287\_01).

<sup>24</sup> *Id.* A state media reporter confirms these symptoms in the same video, saying the girls felt symptoms including "trouble feeling their limbs, headaches, and nausea." *Id.*

<sup>25</sup> *What did the poisoned students from Qom say about the repeated incident at Noor Technical School?* ISNA (Dec. 15, 2022) (Doc. 287\_19).

<sup>26</sup> @Ettehad, TELEGRAM (Dec. 13, 2022) <https://t.me/ettehad/109929> (Doc. 287\_03); *Repeated poisoning of students at a girls' vocational school in Qom*, QOMNA NEWS (Dec. 13, 2022) (Doc. 287\_08); *Poisoning of 51 students and staff of Noor Vocational School in Qom*, IRIB (Dec. 14, 2022) (Doc. 287\_01); *Most of the poisoned schoolgirls in*

additional videos, confirm that girls were taken into an ambulance on stretchers, and that several girls were later wearing breathing masks in a hospital room.<sup>27</sup> According to the state-affiliated news outlet Tasnim, initial clinical assessments carried out by hospital staff showed that the girls were poisoned.<sup>28</sup> Parents complained that doctors were refusing to discuss what caused their children's symptoms.<sup>29</sup>

Domestic media outlets and local officials, including to Dr. Abdullah Sadeghkani, Director of Education for the first district of Qom, confirmed that a similar incident happened at the same school two weeks earlier.<sup>30</sup> There, 18 students were sent to the hospital for illness due to poisoning.<sup>31</sup> At least 2 girls remained in the hospital for at least several days, and one reportedly experienced paralysis from the waist down from "inhal[ing] poisonous gas."<sup>32</sup> Yet suspiciously, just a few days later, hospital and local government officials offered a different account of events: Sadeghkani said doctors insisted "several times" that the girl's paralysis was due to muscle cramps, caused by stress, and government officials explained that the girl's comments came from a "lack of information."<sup>33</sup> Dr. Mehdi Masri, President of Qom University of Medical Sciences, promised test results "by the end of the week," but in the nearly two weeks that followed, no test results were released, nor was any public explanation provided to the school, to parents, or to the schoolgirls about what happened.<sup>34</sup>

Parents in the December 13 incident were angry from the lack of public information and the failure to take safety precautions to prevent another incident.<sup>35</sup> In one video, a parent is filmed yelling at the scene, asking why the school was reopened before an investigation completed and children were safe to return.<sup>36</sup> In another, the filmer can be heard saying, "These dishonorable bastards have shit in this school, they are killing people's kids. I will shit on this government and

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*Qom have been discharged from the hospital*, IRNA (Dec. 13, 2022) (Doc. 287\_22) (reporting that three teachers fell ill but were treated as out-patients).

<sup>27</sup> *Poisoning of 51 students and staff of Noor Vocational School in Qom*, IRIB (Dec. 14, 2022) (Doc. 287\_01); @ManotoNews, X (Dec. 13, 2022) <https://x.com/ManotoNews/status/1602644763014201345> (Doc. 287\_02).

<sup>28</sup> *Poisoning of 51 students at Noor Technical School in Qom / Patients to be discharged within a few hours*, TASNIM (Dec. 13, 2022) (Doc. 287\_12).

<sup>29</sup> *What did the poisoned students from Qom say about the repeated incident at Noor Technical School?* ISNA (Dec. 15, 2022) (Doc. 287\_19).

<sup>30</sup> *Poisoning of 51 students and staff of Noor Vocational School in Qom*, IRIB (Dec. 14, 2022) (Doc. 287\_01); *Repeated poisoning of students at a girls' vocational school in Qom*, QOMNA NEWS (Dec. 13, 2022) (Doc. 287\_08); *The general condition of the students poisoned at a technical high school in Qom is good*, PANA News (Dec. 14, 2022) (Doc. 287\_09); *18 students were poisoned in Qom; all of them are in good condition*, ISNA (Nov. 30, 2022) (Doc. 287\_13).

<sup>31</sup> *18 students were poisoned in Qom; all of them are in good condition*, ISNA (Nov. 30, 2022) (Doc. 287\_13).

<sup>32</sup> *Latest status of the students poisoned in Qom / The Provincial Department of Education is following up on the matter*, ISNA (Dec. 12, 2022) (Doc. 287\_14). According to the girl's father, who was interviewed by ISNA, he had been told that treatment for his daughter could not begin until the hospital knew the type of gas, but they had not been provided test results yet. *Id.* ISNA also reported that some students who were poisoned in the first incident remained in the hospital over two weeks later. *What did the poisoned students from Qom say about the repeated incident at Noor Technical School?* ISNA (Dec. 15, 2022) (Doc. 287\_19).

<sup>33</sup> *Latest status of the students poisoned in Qom / The Provincial Department of Education is following up on the matter*, ISNA (Dec. 12, 2022) (Doc. 287\_14).

<sup>34</sup> *The cause of the students' poisoning to be determined by Friday*, ISNA (Dec. 5, 2022) (Doc. 287\_15).

<sup>35</sup> @ManotoNews, X (Dec. 13, 2022) <https://x.com/ManotoNews/status/1602644763014201345> (Doc. 287\_02).

<sup>36</sup> *Poisoning of 51 students and staff of Noor Vocational School in Qom*, IRIB (Dec. 14, 2022) (Doc. 287\_01).

their schools.”<sup>37</sup> Parents also complained to ISNA reporters, asking why the school was reopened with no safety precautions having been taken if the source of the gas had not yet been determined.<sup>38</sup>

Yet officials’ silence continued. According to local news sources, officials remained silent about the issue for several hours, despite repeated calls from local news, and prevented journalists from gathering information about the incident on the scene.<sup>39</sup> And in an IRIB video, students explained that they waited for two hours but no officers showed up to ask them any questions.<sup>40</sup> ISNA reported that “despite extensive efforts,” the news agency was unable to get an explanation from officials, who told the news outlet that they were still following up with students, receiving test samples, and investigating the cause.<sup>41</sup>

Three days later, there was still no clarity. Although the state-affiliated Islamic Republic News Agency (IRNA) reported that students underwent the “necessary tests” when they arrived at the hospital,<sup>42</sup> the Deputy Medical Director of Qom Province stated that the “nature and name of the gas has not been found yet” and the “cause is still unknown,” although samples were reported to have been collected from the school.<sup>43</sup> This is despite the fact that the girls from Noor told ISNA reporters that the smell of the gas and the symptoms they experienced were the same in both incidents, suggesting that testing from either case could be indicative.<sup>44</sup>

Sometime in early- or mid-February, a number of investigations into this December 13 incident along with other incidents reported at schools in Qom were launched by local and subsequently national officials. According to the deputy prosecutor of Qom, a special working group through the Qom Prosecutor’s Office had been appointed “since the beginning” and was investigating the cause of the two incidents,<sup>45</sup> although no precise date was provided for when the investigation began nor were further details provided about the investigation. The dean of the faculty of medical sciences in Qom told IRNA that fifteen faculty members of Qom’s universities in medical and medical-related fields were investigating the issue, although the dean did not provide names or details about the investigation, nor did he clarify whether these faculty members were part of other ongoing investigations.<sup>46</sup> Qom’s Prosecutor’s Office further reported that 30 families (it is not clear from which school) had filed a complaint with the Prosecutor’s

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<sup>37</sup> @poshtpardeha, TELEGRAM (Dec. 13, 2022) <https://t.me/poshtpardeha/170454> (Doc. 287\_05).

<sup>38</sup> *What did the poisoned students from Qom say about the repeated incident at Noor Technical School?* ISNA (Dec. 15, 2022) (Doc. 287\_19).

<sup>39</sup> *Repeated poisoning of students at a girls' vocational school in Qom*, QOMNA NEWS (Dec. 13, 2022) (Doc. 287\_08).

<sup>40</sup> *Poisoning of 51 students and staff of Noor Vocational School in Qom*, IRIB (Dec. 14, 2022) (Doc. 287\_01).

<sup>41</sup> *What did the poisoned students from Qom say about the repeated incident at Noor Technical School?*, ISNA (Dec. 15, 2022) (Doc. 287\_16).

<sup>42</sup> *Most of the poisoned schoolgirls in Qom have been discharged from the hospital*, IRNA (Dec. 13, 2022) (Doc. 287\_22).

<sup>43</sup> *The cause of the students' poisoning to be determined by Friday*, ISNA (Dec. 5, 2022) (Doc. 287\_15).

<sup>44</sup> *What did the poisoned students from Qom say about the repeated incident at Noor Technical School?* ISNA (Dec. 15, 2022) (Doc. 287\_19).

<sup>45</sup> *What is the cause of the suspicious serial poisonings of students?! A "tangerine-like smell" is emitted during poisoning!*, TASNIM (Feb. 13, 2023) (Doc. 287\_23).

<sup>46</sup> *Serial poisoning of students: from facts to follow-ups*, IRNA (Feb. 22, 2023) (Doc. 287\_26).



office regarding the poisonings and, in response, the Office was investigating the matter.<sup>47</sup> In addition, Deputy Minister of Health Dr. Bahram Einollah was appointed to form a committee of experts and investigate possible poisonings in Qom.<sup>48</sup>

It's not entirely clear what investigators were doing, although officials did provide some details. The County Governor of Qom, Abbas Zakarian, told the IRIB that the passive defense organization<sup>49</sup> had been collecting the “necessary sampling for testing since the very beginning,” which appeared to include blood samples from affected students.<sup>50</sup> He claimed that the Iranian Revolutionary Guard Corps (IRGC) had ordered monitoring and surveillance teams to examine dozens of schools around Qom and collect samples, although it is not clear which schools or what samples were collected.<sup>51</sup> Qom PR official Mohammad Taqi Shahcheraghi told IRNA on February 16 that teams had gathered “several sets of samples” from “the air, different surfaces, school water, food, etc., and sent the samples various advanced laboratories around the country,”<sup>52</sup> but did not specify who gathered the samples or from where the samples were collected. Qom’s Provincial Governor also told the IRIB that “all cameras in Qom schools have been reviewed to check for the possibility of suspicious individuals’ presence,” but did not specify what – if anything – investigators found.<sup>53</sup> Officials also announced that school inspections were carried out in 581 schools across Qom – presumably including Noor, although we don’t know for sure – to ensure school safety, including examining heating systems that could have leaked carbon monoxide.<sup>54</sup>

Throughout February 2023, officials released a slew of contradictory information about findings from their ongoing investigations into the incidents in Qom such as the December 13 incident at Noor. Some officials claimed that the incidents in Qom were attributable to ammonia gas,<sup>55</sup>

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<sup>47</sup> *Id.*

<sup>48</sup> *Deputy Minister of Health appointed to investigate poisoning of Qomi students*, IRIB (Feb. 17, 2023) (Doc. 287\_27).

<sup>49</sup> The passive defense organization is a domestic organization tasked with protecting Iranian infrastructure, deterring aggressors from attacking Iran, and monitoring and preempting potential threats, including those from domestic unrest or cyberspace. See Aaron Pilkington, *Military, Political, Cultural, and Societal Implications of the Islamic Republic of Iran’s Passive Defense Strategy*, *Electronic Theses and Dissertations*, 134-137 (2024) <https://digitalcommons.du.edu/etd/2474>.

<sup>50</sup> *Qom’s County Governor: No toxic agents were found in the tests of Qom students*, IRIB (Feb. 14, 2023) (Doc. 287\_24) (claiming that no toxic agents had been identified in the students’ blood, thus suggesting that blood samples had been gathered and tested).

<sup>51</sup> *Id.* The IRGC is a parallel military force separate from the country’s official armed forces that reports directly to the Supreme Leader Ayatollah Khamenei. In addition to a foreign policy and military role, the IRGC is an influential force in domestic politics and internal security operations. See *The Islamic Revolutionary Guard Corps (IRGC)*, COUNCIL ON FOREIGN RELATIONS (June 13, 2025) <https://www.cfr.org/background/irans-revolutionary-guards#chapter-title-0-5>.

<sup>52</sup> *581 schools in Qom were visited by specialized teams*, IRNA (Feb. 16, 2023) (Doc. 287\_25).

<sup>53</sup> *Qom’s County Governor: No toxic agents were found in the tests of Qom students*, IRIB (Feb. 14, 2023) (Doc. 287\_24).

<sup>54</sup> *581 schools in Qom were visited by specialized teams*, IRNA (Feb. 16, 2023) (Doc. 287\_25).

<sup>55</sup> *Ammonia gas is not the cause of poisoning of Qom students*, TASNIM (Feb. 9, 2023) (Doc. 287\_28) (quoting MP Ahmad Amirabadi Farahani, who told Tasnim that Education Minister Yousef Nouri told him the cause of the poisonings in Qom was ammonia gas); *The Story of Serial Poisonings, Roots and Possibilities*, IRNA (Mar. 1, 2023) (quoting Alireza Monadi, member of the Parliamentary Education and Research Commission, who stated that “based on the results of the tests, it was determined that N2 (ammonia) gas was present in the poison released in

while others asserting that no traces of ammonia gas had been found in schools.<sup>56</sup> Still others claimed that the cause of the poisonings in Qom was “not microbial” and was “very mild,”<sup>57</sup> while different officials reported to have identified nitrogen (“N2”) gas in some sample analyses.<sup>58</sup> Some also asserted that the incidents were intentional or otherwise indicated that they were a security issue, not a psychological one.<sup>59</sup> Yet these details were few and far between, and it appears that frustration with officials grew, even for state-affiliated news and leading religious figures in Qom, the holiest city in Iran and the power center for Iran’s religious leadership.<sup>60</sup>

It is unlikely that nitrogen gas was responsible.<sup>61</sup> No other details were provided for this case, including toxicology reports to support various announcements by officials.

In addition to investigations, officials appear to have taken no steps to add security features at schools in Qom in order to prevent future incidents. ISNA reported that sometime before February 11, Qom’s Education Department held briefings with school administrators across Qom together with the passive defense organization and emergency response personnel.<sup>62</sup> School administrators were encouraged to trust students should they smell something strange and were instructed on safety actions to take should this occur, but they were not promised additional school security.<sup>63</sup>

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schools, which will be immediately eliminated in the body and is in a combined ... form, which is why it is difficult to detect”).

<sup>56</sup> *Ammonia gas is not the cause of poisoning of Qom students*, TASNIM (Feb. 9, 2023) (Doc. 287\_28) (quoting the Education Minister Yousef Nouri who told Tasnim that the cause was not ammonia gas); *see also Denial of the existence of ammonia gas in Qom schools*, IRIB (Feb. 8, 2023) (Doc. 287\_30) (quoting the head of Qom’s Fire Department Abbas Jafari, who stated that “no traces of ammonia gas have been discovered in inspections of 115 schools”).

<sup>57</sup> *Serial poisoning of students: from facts to follow-ups*, IRNA (Feb. 22, 2023) (Doc. 287\_26).

<sup>58</sup> *Release of N<sub>2</sub> gas was the cause of the students' poisoning*, IRNA (Feb. 28, 2023) (Doc. 257\_38). Note that other articles reported this as “N2 (ammonia).” *See, e.g., The Story of Serial Poisonings, Roots and Possibilities*, IRNA (Mar. 1, 2023). It is unclear if “N2” meant nitrogen or a different gas.

<sup>59</sup> *Ammonia gas is not the cause of poisoning of Qom students*, TASNIM (Feb. 9, 2023) (Doc. 287\_29) (quoting MP Ahmad Amirabadi Farahani, who called the poisonings “suspicious” and pointed to the fact that security personnel were investigating the incidents, indicating the poisonings were viewed as a potential security issue); *What is the cause of the suspicious serial poisonings of students?! A "tangerine-like smell" is emitted during poisoning!*, TASNIM (Feb. 13, 2023) (Doc. 287\_23) (referring to several officials who suggested the incidents in Qom were intentional, including Ahmad Hajizadeh, deputy for political and security affairs in Qom, and MP Farahani); *The Story of Serial Poisonings, Roots and Possibilities*, IRNA (Mar. 1, 2023) (Doc. 287\_29) (quoting County Qom Governor Abbas Zakarian, who announced that intelligence and security agencies, along with the IRGC, had arrived to investigate the poisoning incidents in Qom, which IRNA observes suggests a deliberate sabotage operation was responsible).

<sup>60</sup> *See infra* Part II; *see also What is the cause of the suspicious serial poisonings of students?! A "tangerine-like smell" is emitted during poisoning!*, TASNIM (Feb. 13, 2023) (Doc. 287\_23) (asking “has the passage of more than two months since the first poisoning incident not been enough time to investigate the ... issue and inform concerned parents?”); Ayatollah Subhani: *The perpetrators and those responsible for the poisoning of students should be dealt with*, <https://fa.shafaqna.com/news/1539844/> (Mar. 2, 2023); “Seriousness” in identifying those responsible for the poisoning of students and “timely information dissemination” are what the people are demanding, (Mar. 10, 2023) <https://fa.shafaqna.com/news/1535328/>.

<sup>61</sup> *See N<sub>2</sub> Gas Was Present in the Poison Released in Schools: False*, FACTNAMEH (Mar. 2, 2023).

<sup>62</sup> *“Poisoning Incident” From Anxiety and Delusions to Lack of Work / Briefing Sessions for Teachers to Be Held*, ISNA (Mar. 3, 2023).

<sup>63</sup> *Id.*



Ultimately, we did not find an explanation for what happened at Noor Girls' School in Qom on December 13, 2022 (beyond vague assertions of possible gases that were used), despite claims that investigations were being carried out. Nor did we find reports that perpetrators were identified, arrested and tried in a court of law with due process for this specific incident. We also did not find evidence that officials took additional security measures to protect Noor Girls' School in Qom from future incidents.

### February 25 and 26, 2023: Two Poisoning Incidents in Borujerd, Lorestan

On February 25 and 26, two poisoning incidents were reported in Borujerd by state-affiliated news sources at two different girls' high schools, the Ahmadiyya and 15 Khordad schools. Each case is summarized below, followed by a description of officials' responses and explanations for these cases.

#### February 25, 2023: *Ahmadiyyah Girls' High School, Borujerd, Lorestan*

At some point on Saturday morning, February 25, 2023, state media sources reported that at least 44 girls from Ahmadiyyah Girls' High School were sent to the hospital with symptoms of poisoning.<sup>64</sup> At least four ambulances arrived at the scene, and parents can be seen in raw video footage gathered outside of school gates.<sup>65</sup> A police car was also filmed at the scene.<sup>66</sup> The Deputy Mayor of Borujerd, Moslem Moradi, confirmed he was on the scene and saw "students being taken to the hospital with symptoms of poisoning,"<sup>67</sup> including nausea, weakness, lethargy, and dizziness.<sup>68</sup> Tasnim added numbness and coughing to the list of reported symptoms.<sup>69</sup> IRNA

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<sup>64</sup> *Representative of the people of Borujerd: Oversight bodies should determine the cause of the incident at Ahmadiyeh School*, IRNA (Feb. 25, 2023) (Doc. 255\_11); *The reason behind the poisoning of students in Borujerd requires investigation by specialized teams*, IRNA (Feb. 26, 2023) (Doc. 255\_15); *Repeated serial poisoning in Borujerd / 44 more students were taken to the hospital*, TASNIM (Feb. 25, 2023) (Doc. 255\_24); *Another poisoning of Borujerd students*, ISNA (Feb. 25, 2023) (Doc. 255\_27). Ham-Mihan confirmed this number, based on an interview with an unnamed official. See *Stink Bombs: New details about the poisoning incident of schoolgirls at two high schools and one elementary school in Borujerd*, HAM MIHAN (Feb. 27, 2023) (Doc. 255\_16). However, Tasnim reports that the number of injured students was well over 44, according to an eyewitness student. *An account from one of the students about the serial poisonings at Ahmadiyeh School in Borujerd*, TASNIM (Feb. 25, 2023) (Doc. 255\_10). An eyewitness mother of a student said the number was closer to 70. *Stink Bombs: New details about the poisoning incident of schoolgirls at two high schools and one elementary school in Borujerd*, HAM MIHAN (Feb. 27, 2023) (Doc. 255\_16). In an interview, MP for Borujerd Fatemeh Maghsoudi told IRNA that there were "about 50 students at one time" in the hospital. *Representative of the people of Borujerd: Oversight bodies should determine the cause of the incident at Ahmadiyeh School*, IRNA (Feb. 25, 2023) (Doc. 255\_11).

<sup>65</sup> @IranIntl, X (Feb. 25, 2023) <https://x.com/IranIntl/status/1629438618593886210?s=20> (Doc. 255\_03); *An account from one of the students about the serial poisonings at Ahmadiyeh School in Borujerd*, TASNIM (Feb. 25, 2023) (Doc. 255\_10). Security guards can be seen standing outside of the school's front gates. *Id.*

<sup>66</sup> @IranIntl, X (Feb. 25, 2023) <https://x.com/IranIntl/status/1629438618593886210?s=20> (Doc. 255\_03).

<sup>67</sup> *Poisoning of female students at Ahmadiyya High School in Borujerd for the third time*, ETEMAD DAILY (Feb. 25, 2023) (Doc. 255\_13).

<sup>68</sup> *Students affected by poisoning in Borujerd are receiving treatment*, IRNA (Feb. 25, 2023) (Doc. 255\_21).

<sup>69</sup> *An account from one of the students about the serial poisonings at Ahmadiyeh School in Borujerd*, TASNIM (Feb. 25, 2023) (Doc. 255\_10).

reported that there were not enough beds in the hospital to treat victims,<sup>70</sup> and that the school was closed for the rest of the day.<sup>71</sup>



Source: @IranIntl, X (Feb. 25, 2023) <https://x.com/IranIntl/status/1629438618593886210?s=20> (Doc. 255\_03).

Ham Mihan interviewed three students from Ahmadiyyah High School who experienced this incident.<sup>72</sup> Parashtu told the outlet that she first noticed a strange smell while outside in the schoolyard, comparing it to bleach.<sup>73</sup> After returning inside the school, she began feeling dizzy and got a headache.<sup>74</sup> She was then told that there was gas in the school and that students needed to evacuate.<sup>75</sup> She followed evacuation orders but after coming outside, she couldn't find one of her friends.<sup>76</sup> So she went back inside to look for her friend.<sup>77</sup> When she went into her classroom she felt pain in her chest.<sup>78</sup> She turned around to go back downstairs, and that's when she lost feeling in her legs.<sup>79</sup> She fell down the stairs, and a teacher ran towards her to check on her.<sup>80</sup> She said she smelled vinegar, and said it did not smell like typical "city gas."<sup>81</sup> She was hospitalized and given oxygen because she continued to struggle to breathe, and said she also felt nauseous and dizzy.<sup>82</sup>

Zahra, another girl from Ahmadiyya school, says she also experienced the poisoning, feeling dizzy and short of breath, heart palpitations, and tingling hands.<sup>83</sup> Her mother added that Zahra was in poor condition by the time she was let into the school gates, saying that Zahra's legs were

<sup>70</sup> *Representative of the people of Borujerd: Oversight bodies should determine the cause of the incident at Ahmadiyeh School*, IRNA (Feb. 25, 2023) (Doc. 255\_11).

<sup>71</sup> *Students affected by poisoning in Borujerd are receiving treatment*, IRNA (Feb. 25, 2023) (Doc. 255\_21); *The continuation of poisoning of Borujerd students*, IRNA (Feb. 27, 2023) (Doc. 257\_35).

<sup>72</sup> *Stink Bombs: New details about the poisoning incident of schoolgirls at two high schools and one elementary school in Borujerd*, HAM MIHAN (Feb. 27, 2023) (Doc. 255\_16).

<sup>73</sup> *Id.*

<sup>74</sup> *Id.*

<sup>75</sup> *Id.*

<sup>76</sup> *Id.*

<sup>77</sup> *Id.*

<sup>78</sup> *Id.*

<sup>79</sup> *Id.*

<sup>80</sup> *Id.*

<sup>81</sup> *Id.* We have no further information indicating what this student meant by "city gas."

<sup>82</sup> *Id.*

<sup>83</sup> *Id.*

numb and her hands were tingling.<sup>84</sup> She said that Zahra had to remain on oxygen at the hospital because the oxygen levels in her blood kept dipping, an effect she says doctors told her could not have been caused by carbon monoxide poisoning.<sup>85</sup> A third student, Mahbuba, says that she experienced chest pain and heart palpitations and also had to go to the hospital.<sup>86</sup> During this incident, Mahbuba told Ham Mihan that after first feeling bad inside her classroom, she came outside to the courtyard, where she felt even worse.<sup>87</sup> She tried to go back inside, but nearly fainted while trying to climb the stairs back into the school.<sup>88</sup> She was hospitalized overnight, and even when the journalist interviewed her over a day later, she kept coughing over the phone, according to the journalist.<sup>89</sup>

It is unclear how many students stayed overnight in the hospital for further treatment, although it was at least several. Majid Monemi, the Deputy Governor of Lorestan for Political, Security, and Social Affairs, confirmed this the following day in an interview, stating that students were still in the hospital undergoing further treatment due to “stress.”<sup>90</sup> Even ten days after the incident, Ham Mihan followed up with the mother of Ansiyah, a 16-year old affected student, who told the reformist news outlet that her daughter is “still suffering from the effects of the poisoning” and had not been to school since.<sup>91</sup> According to her mother, Ansiyah was still experiencing shortness of breath, chest pain, and weakness in her muscles, as of March 6, 2023.<sup>92</sup>

The principal and another administrator or teacher were also reportedly poisoned and hospitalized, according to both Mahbuba and Parashtu,<sup>93</sup> although this fact was denied by state-affiliated Tasnim, which claimed that no teachers or administrators were harmed.<sup>94</sup>

While officials announced that two previous incidents at this school the same week were caused by a leaking pipe from a nearby gymnasium,<sup>95</sup> there was no official explanation for what caused the February 25 incident. On the evening of February 25, Moslem Moradi, the Deputy Mayor of Borujerd, confirmed that a “specialized team” was deployed to Ahmadiyya High School and they did not find evidence of a gas leak or “other signs of poisoning.”<sup>96</sup> Saeed Razani, Director

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<sup>84</sup> *Id.*

<sup>85</sup> *Id.*

<sup>86</sup> *Id.*

<sup>87</sup> *Id.*

<sup>88</sup> *Id.*

<sup>89</sup> *Id.*

<sup>90</sup> [\*Remarks by the Deputy Governor of Lorestan Province regarding the news reports covering schools in Borujerd\*](#), IRNA (Feb. 26, 2023) (Doc. 255\_20).

<sup>91</sup> [\*The Minister Apologized, the Desks Emptied: Accounts from school principals, teachers, and students' families about classrooms after the poisoning incidents\*](#), HAM MIHAN (Mar. 6, 2023) (Doc. 255\_19).

<sup>92</sup> [\*The Minister Apologized, the Desks Emptied: Accounts from school principals, teachers, and students' families about classrooms after the poisoning incidents\*](#), HAM MIHAN (Mar. 6, 2023) (Doc. 255\_19).

<sup>93</sup> [\*Stink Bombs: New details about the poisoning incident of schoolgirls at two high schools and one elementary school in Borujerd\*](#), HAM MIHAN (Feb. 27, 2023) (Doc. 255\_16).

<sup>94</sup> [\*An account from one of the students about the serial poisonings at Ahmadiyeh School in Borujerd\*](#), TASNIM (Feb. 25, 2023) (Doc. 255\_10).

<sup>95</sup> [\*Repeated serial poisoning in Borujerd / 44 more students were taken to the hospital\*](#), TASNIM (Feb. 25, 2023) (Doc. 255\_24).

<sup>96</sup> [\*Governor: Investigation of the poisoning of Borujerd students has been entrusted to specialists\*](#), IRNA (Feb. 25, 2023) (Doc. 255\_23). This team may have been made up of medical, military, and security forces, as reported by

General of the Lorestan Inspection Organization, told Tasnim that unlike the first two incidents at Ahmadiyya, the cause of the February 25 incident was “not clear.”<sup>97</sup> Adding to this, an unnamed official explained to Ham Mihan that a leaking gas pipe could not have caused this incident because the school had shut the heat off to prevent any further gas leaks.<sup>98</sup> This explanation appears to align with both Mahbuba’s experience, who told the news outlet that her symptoms were much worse during this incident than the prior incidents attributed to gas leaks. It also aligns with Zahra’s mother, who told Ham Mihan that Zahra’s doctor told her Zahra’s symptoms could not have been caused by carbon monoxide poisoning.<sup>99</sup>

As detailed below, a flurry of responses and announced investigations followed this incident, but it is unclear how seriously the investigations were ever pursued. We did not find an explanation for what happened at Ahmadiyya Girls’ High School on February 25, nor did we find reports that perpetrators had been identified or arrested and prosecuted in a court of law with due process protections for this specific incident. Suspiciously, school officials at Ahmadiyya were reported to have claimed that the school did have CCTV cameras but they were turned off at the time of the incident, preventing officials from gathering evidence.<sup>100</sup> It’s unclear how – or by whom – those cameras were turned off, or whether they were in fact turned off at all. In addition, we did not find evidence that officials took additional security measures to protect Ahmadiyya Girls’ High School from future incidents, although videos at the scene show guards blocking the gates to the school, suggesting the school did have some security in place.<sup>101</sup>

#### February 26, 2023: 15 Khordad Girls’ High School, Borujerd, Lorestan

The day after the Ahmadiyya incident, on February 26, 2023, at least 107 girls were poisoned, according to state-affiliated media, at 15 Khordad Girls’ High School in Borujerd, Lorestan.<sup>102</sup> According to Ham Mihan, two students from the school saw an object “resembling a small bomb” thrown into the school from the schoolyard that released a gas causing their symptoms.<sup>103</sup> A former teacher who claimed to know other students at the school reported that students told her the gas had a minty smell.<sup>104</sup> Medical personnel interviewed by reporters said that based on

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Tasnim. [\*An account from one of the students about the serial poisonings at Ahmadiyeh School in Borujerd\*](#), TASNIM (Feb. 25, 2023) (Doc. 255\_10).

<sup>97</sup> [\*Repeated serial poisoning in Borujerd / 44 more students were taken to the hospital\*](#), TASNIM (Feb. 25, 2023) (Doc. 255\_24).

<sup>98</sup> [\*Stink Bombs: New details about the poisoning incident of schoolgirls at two high schools and one elementary school in Borujerd\*](#), HAM MIHAN (Feb. 27, 2023) (Doc. 255\_16).

<sup>99</sup> [\*Stink Bombs: New details about the poisoning incident of schoolgirls at two high schools and one elementary school in Borujerd\*](#), HAM MIHAN (Feb. 27, 2023) (Doc. 255\_16).

<sup>100</sup> [\*The Minister Apologized, the Desks Emptied: Accounts from school principals, teachers, and students' families about classrooms after the poisoning incidents\*](#), HAM MIHAN (Mar. 6, 2023) (Doc. 255\_19).

<sup>101</sup> See @IranIntl, X (Feb. 25, 2023) <https://x.com/IranIntl/status/1629438618593886210?s=20> (Doc. 255\_03).

<sup>102</sup> [\*Poisoning of students at the 15 Khordad Girls' High School in Borujerd\*](#), IRNA (Feb. 26, 2023) (Doc. 257\_01); [\*Poisoning of 107 students at the 15 Khordad Girls' High School in Borujerd\*](#), MEHR (Feb. 26, 2023) (Doc. 257\_04); [\*Poisoning of 15 Khordad Borujerd students / Most of the students have been discharged\*](#), ISNA (Feb. 26, 2023) (Doc. 257\_05); [\*Continued poisoning in Borujerd schools / 107 more students were taken to the hospital\*](#), TASNIM (Feb. 26, 2023) (Doc. 257\_32).

<sup>103</sup> [\*Stink Bombs: New details about the poisoning incident of schoolgirls at two high schools and one elementary school in Borujerd\*](#), HAM MIHAN (Feb. 27, 2023) (Doc. 255\_16).

<sup>104</sup> [\*Stink Bombs: New details about the poisoning incident of schoolgirls at two high schools and one elementary school in Borujerd\*](#), HAM MIHAN (Feb. 27, 2023) (Doc. 255\_16).



the student's descriptions, it appears that the gas was released in a hallway, affecting students in multiple classrooms.<sup>105</sup> Officials closed the school for the afternoon,<sup>106</sup> and an unnamed hospital official told Ham Mihan that security forces were present at the hospital when the students from 15 Khordad were treated.<sup>107</sup>



Source: @bbcpersian, X (Feb. 26, 2023) <https://x.com/bbcpersian/status/1629811334417186817> (Doc. 257\_09).

Multiple videos and photos show at least one ambulance at or leaving the school gates,<sup>108</sup> and what appears to be a girl sitting in the front seat of the ambulance, her head tilted backwards as if dizzy or having difficulty breathing.<sup>109</sup> State media listed symptoms experienced by girls as including “nausea, dizziness, headache, and lethargy,” but reported that the deputy mayor of Borujerd claimed most girls were “fine” and discharged following hospitalization.<sup>110</sup> According to Ham Mihan, an interviewed emergency doctor who claimed to have treated many of the students from 15 Khordad listed their symptoms as “headaches, breathing problems, lethargy, nausea, and low blood pressure.”<sup>111</sup> An “informed source” at a hospital that treated poisoned girls (including those from this case and other cases occurring in Borujerd that day) told domestic news outlet Shargh Daily that the girls who arrived at the hospital were “drowsy” and had “severe nausea, vomiting, and dizziness.”<sup>112</sup> This source also claimed that “some of the

<sup>105</sup> *Families are worried, officials remain silent / Hospitals are not testing the poisoned students / Testing has been left to the families*, SHARGH DAILY (Feb. 27, 2023) (Doc. 257\_28).

<sup>106</sup> *Continued poisoning in Borujerd schools / 107 more students were taken to the hospital*, TASNIM (Feb. 26, 2023) (Doc. 257\_32).

<sup>107</sup> *Stink Bombs: New details about the poisoning incident of schoolgirls at two high schools and one elementary school in Borujerd*, HAM MIHAN (Feb. 27, 2023) (Doc. 255\_16).

<sup>108</sup> @bbcpersian, X (Feb. 26, 2023) <https://x.com/bbcpersian/status/1629811334417186817> (Doc. 257\_09);

@Sokhaniaznikan, TELEGRAM (Feb. 26, 2023) <https://t.me/Sokhaniaznikan/139066> (Doc. 257\_11);

@B80umUFC9BnCTJX, X (Feb. 26, 2023) <https://x.com/B80umUFC9BnCTJX/status/1629792501539192833> (Doc. 257\_14).

<sup>109</sup> @bbcpersian, X (Feb. 26, 2023) <https://x.com/bbcpersian/status/1629811334417186817> (Doc. 257\_09).

<sup>110</sup> Doc. 257\_05 (ISNA); *Poisoning of students at the 15 Khordad Girls' High School in Borujerd*, IRNA (Feb. 26, 2023) (Doc. 257\_01).

<sup>111</sup> *Stink Bombs: New details about the poisoning incident of schoolgirls at two high schools and one elementary school in Borujerd*, HAM MIHAN (Feb. 27, 2023) (Doc. 255\_16).

<sup>112</sup> *Families are worried, officials remain silent / Hospitals are not testing the poisoned students / Testing has been left to the families*, SHARGH DAILY (Feb. 27, 2023) (Doc. 257\_28).

children were short of breath and we had to put them on oxygen.”<sup>113</sup> The girls’ symptoms lasted for at least 24 hours.<sup>114</sup>

Several days after the incident, Director General of Lorestan Province’s Education Department Reza Ezzati told the state-affiliated news outlet Mehr that all students who experienced poisoning in the previous days were in good condition, and that the schools were open and all activities were normal.<sup>115</sup> Yet there was no mention – by eyewitnesses, by officials, or by state- and IRGC-affiliated news outlets – of additional security measures taken at 15 Khordad once it reopened to protect the students from another incident.

As detailed below, officials were well-aware of this incident, which helped spark a plethora of statements and investigations into what was going on. Seemingly to aid these investigations, domestic journalists reported on the extensive network of CCTV camera locations around the school and on its entrance that could help identify the perpetrators.<sup>116</sup> Yet despite this possible trove of evidence, we did not find a clear explanation for what happened to girls at 15 Khordad, nor did we find reports that perpetrators were identified, arrested, and tried in a court of law with due process for this incident.

### *Officials’ Responses and Explanations to the Two Borujerd Cases*

The poisonings spurred a flurry of reactions from local and national officials. Between February 25 and February 28, a number of officials at the local, regional, and national level commented on these and other poisoning incidents, calling them “intentional” and speculating that they were aimed at closing girls’ schools in Iran.<sup>117</sup> Of particular interest was Member of Parliament (MP) for Borujerd Fatemeh Maghsoudi’s reaction, who told Ham-Mihan, a domestic news outlet, that the poisonings in Borujerd were “100% intentional” according to evidence officials had uncovered using CCTV footage and allegedly showed her.<sup>118</sup> In addition, in the wake of these

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<sup>113</sup> *Families are worried, officials remain silent / Hospitals are not testing the poisoned students / Testing has been left to the families*, SHARGH DAILY (Feb. 27, 2023) (Doc. 257\_28).

<sup>114</sup> *Stink Bombs: New details about the poisoning incident of schoolgirls at two high schools and one elementary school in Borujerd*, HAM MIHAN (Feb. 27, 2023) (Doc. 255\_16) (The day after the incident, the MP for Borujerd Fatema Maghsoudi reported that some students were still experiencing residual coughing and dizziness).

<sup>115</sup> *The ongoing series of student poisonings — In which provinces has the issue been confirmed?* MEHR (Mar. 1, 2023) (Doc. 257\_30).

<sup>116</sup> *Possibility of identifying those responsible for the poisoning at the girls’ school in Borujerd through the available CCTV footage*, ETEMAD DAILY (Mar. 1, 2023) (Doc. 257\_27).

<sup>117</sup> See, e.g., *Stink Bombs: New details about the poisoning incident of schoolgirls at two high schools and one elementary school in Borujerd*, HAM MIHAN (Feb. 27, 2023) (Doc. 255\_16) (Homayoun Sameh Najafabadi, a member of the Parliamentary Health Commission, who said that the poisoning of the students in Qom and Borujerd was intentional); 257\_07 (quoting Younes Panahi, Deputy Minister of Research and Technology of the Ministry of Health and Medical Education, who called the poisonings in Borujerd “intentional” and were aimed at closing girls’ schools, although he walked back this statement a day later); *The reaction of the Khorramabad representative to the poisoning of students in Borujerd*, TASNIM (Feb. 28, 2023) (Doc. 255\_25) (quoting Mehrdad Vaiskarami, MP of Khorramabad, another city in Lorestan, who said that the incidents were “deliberate” and some people were seeking to “close schools”); *Formation of a parliamentary task force to follow up on the student poisonings*, TASNIM (Feb. 26, 2023) (Doc. 255\_26) (quoting Alireza Monadi, head of the Parliamentary Educational and Research Commission, who said that it is “unclear why those who sought unrest in previous months are now deliberately seeking to close girls’ schools”).

<sup>118</sup> *Stink Bombs: New details about the poisoning incident of schoolgirls at two high schools and one elementary school in Borujerd*, HAM MIHAN (Feb. 27, 2023) (Doc. 255\_16).

incidents, at least nine different investigations were announced by national and local officials to look into poisoning incidents in Borujerd.<sup>119</sup> It is unclear whether all of these announced investigative efforts were distinct or whether some were the same, and whether any were working in coordination with one another. In any case, the sheer number of alleged investigations pursued by various officials was likely confusing for parents and students alike, and obfuscated who was actually in charge of investigating.

More concerning than obfuscation and confusion, however, is the fact that officials do not appear to have ever gathered samples for testing from the girls affected. According to an unnamed official at a hospital that treated the poisoned girls, the hospital did not gather samples or conduct tests concerning the poisoning agent, nor was this person aware of any instructions to medical personnel to gather samples for future testing at other labs.<sup>120</sup> Instead, parents were told it was their responsibility to find specialized labs to test their children if they wanted.<sup>121</sup>

In addition, CCTV cameras had reportedly been installed in and around both schools, providing for the possibility of footage capturing the perpetrators.<sup>122</sup> Indeed, such evidence was alluded to

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<sup>119</sup> See, e.g., [Formation of a parliamentary task force to follow up on the student poisonings](#), TASNIM (Feb. 26, 2023) (Doc. 255\_26) (quoting Alireza Monadi, head of the Parliamentary Educational and Research Commission, who announced on February 26 that a working group was formed to examine the “serial poisonings of students in Qom and Borujerd,” and that the Ministers of Health and Education would be part of the commission, and that the Ministry of Information would be invited to attend given their ongoing investigation); [Stink Bombs: New details about the poisoning incident of schoolgirls at two high schools and one elementary school in Borujerd](#), HAM MIHAN (Feb. 27, 2023) (Doc. 255\_16) (quoting Homayoun Sameh Najafabadi, a member of the Parliamentary Health Commission, who said that the Minister of Intelligence was investigating poisoning cases, but lamented that no report had been given to Parliament yet); [Repeated serial poisoning in Borujerd / 44 more students were taken to the hospital](#), TASNIM (Feb. 25, 2023) (Doc. 255\_24); (quoting Saeed Razani, Director General of the Lorestan Inspection Organization, who told Tasnim that the Inspection Organization’s experts were investigating); [Repeat poisoning of Borujerd students, this time at the 15 Khordad High School](#), MEHR (Feb. 26, 2023) (Doc. 257\_25) (quoting Majid Monemi, the Deputy Governor of Lorestan Province for Political, Social, and Security Affairs, who explained that a team of experts was convened and were investigating the cause, but no explanation had yet been shared with the public); [The reaction of the Khorramabad representative to the poisoning of students in Borujerd](#), TASNIM (Feb. 28, 2023) (Doc. 255\_25) (quoting MP for Khorramabad Mehrdad Vaiskarami who said the nearby “University of Medical Sciences” was investigating the issue); [Governor: Investigation of the poisoning of Borujerd students has been entrusted to specialists](#), IRNA (Feb. 25, 2023) (Doc. 255\_23) (quoting Moslem Moradi, Deputy Mayor of Borujerd, who said on the evening of February 25 that a group of experts had been convened and would be investigating the issue); [A special investigation and fact-finding team for student poisonings will be dispatched to Borujerd](#), IRNA (Feb. 26, 2023) (Doc. 257\_36) (quoting MP for Borujerd Fatemeh Maghsoudi, who announced on February 27 that an investigative team from the Parliament’s Health Commission would be dispatched to investigate the recent poisonings in Borujerd); [The Qom prosecutor has intervened in the student poisoning case but has not yet reached a conclusion](#), ETEMAD DAILY (Feb. 27, 2023) Doc. 255\_18) (quoting the First Deputy of the Judiciary Mohammad Mossadegh saying in a side comment to reporters that the Qom prosecutor had been involved in investigating the Qom and Borujerd incidents but “no results have been achieved so far”).

<sup>120</sup> [Families are worried, officials remain silent / Hospitals are not testing the poisoned students / Testing has been left to the families](#), SHARGH DAILY (Feb. 27, 2023) (Doc. 257\_28).

<sup>121</sup> [Families are worried, officials remain silent / Hospitals are not testing the poisoned students / Testing has been left to the families](#), SHARGH DAILY (Feb. 27, 2023) (Doc. 257\_28).

<sup>122</sup> [The Minister Apologized, the Desks Emptied: Accounts from school principals, teachers, and students' families about classrooms after the poisoning incidents](#), HAM MIHAN (Mar. 6, 2023) (Doc. 255\_19) (discussing Ahmadiyya school officials claiming that classrooms were equipped with CCTV cameras but they had been turned off during the incident); [Possibility of identifying those responsible for the poisoning at the girls' school in Borujerd through the](#)



by Borujerd MP Maghsoudi, who said she had seen evidence from officials based on CCTV footage that indicated the acts were intentional.<sup>123</sup> Yet no such evidence was ever used to provide a public explanation for what happened, nor did it seem to be used to identify the perpetrators for either case.

Instead, officials appeared preoccupied with trying to control the information space and calm the public. State-affiliated news announced on February 26 that all information about the poisonings would be “entrusted” to the Lorestan Provincial Governor’s office.<sup>124</sup> A day later, Majid Monemi, the Deputy Governor of Lorestan Province for Political, Social, and Security Affairs, encouraged the public not to believe any rumors about what caused the incidents in Borujerd and to only look to “official” sources for information about the poisonings.<sup>125</sup> Local officials, including the head of Borujerd’s education department, the head of the Borujerd’s Ministry of Health’s disease control department, and the principals of the schools affected, were reported to have actively avoided Iran-based journalists’ requests for information about the incidents and the ongoing investigations, instead directing the news outlet to the Lorestan Provincial Governor’s public relations department, which also refused to comment.<sup>126</sup>

On February 28, Reza Ezzati, Director General of the Education Department of Lorestan Province, told state-affiliated news that all students who experienced poisoning in the last few days were in good condition, all schools were open and activities normal,<sup>127</sup> and counselors had been deployed at schools to help students cope with stress.<sup>128</sup> Noticeably absent from Ezzati’s rendition was any discussion of school security enhancements to prevent future attacks and keep students safe. Then, on March 1, Azam Goodarzi, the Director General of the Health and Wellness Office for the national Ministry of Education, appeared to take a public relations tour of Borujerd, visiting a hospital, Ahmadiyya Girls’ High School, and a teachers’ council meeting in Borujerd, emphasizing in public comments the importance of student wellness and the next generation.<sup>129</sup> Like Ezzati, Goodarzi did not discuss enhanced security for students nor did he raise concerns about the lack of information from ongoing investigations, appearing focused instead on smoothing things over.

Meanwhile, state-affiliated media spread several unsubstantiated speculations for what may have caused the incidents in Borujerd. The spokesperson for the Ministry of Health, Treatment and

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available CCTV footage, ETEMAD DAILY (Mar. 1, 2023) (Doc. 257\_27) (published locations of CCTV cameras around 15 Khordad and on its front gates, and encouraged officials to use these cameras to identify perpetrators).

<sup>123</sup> Stink Bombs: New details about the poisoning incident of schoolgirls at two high schools and one elementary school in Borujerd, HAM MIHAN (Feb. 27, 2023) (Doc. 255\_16).

<sup>124</sup> The continuation of poisoning of Borujerd students, IRNA (Feb. 27, 2023) (Doc. 257\_35).

<sup>125</sup> Repeat poisoning of Borujerd students, this time at the 15 Khordad High School, MEHR (Feb. 26, 2023) (Doc. 257\_25).

<sup>126</sup> Families are worried, officials remain silent / Hospitals are not testing the poisoned students / Testing has been left to the families, SHARGH DAILY (Feb. 27, 2023) (Doc. 257\_28).

<sup>127</sup> The ongoing series of student poisonings — In which provinces has the issue been confirmed? MEHR (Mar. 1, 2023) (Doc. 257\_30); see also The poisoned students of Borujerd are in full health, TASNIM (Feb. 28, 2023) (Doc. 257\_33) (reporting that two days after the 15 Khordad incident students were in “perfect health”).

<sup>128</sup> Establishment of 10 accommodation centers for Nowruz travelers / Poisoned students from Borujerd are present in their classrooms, ISNA (Mar. 1, 2023) (Doc. 257\_31).

<sup>129</sup> Visit of the Director General of the Health Office of the Ministry of Education to the poisoned students of Borujerd, IRNA (Mar. 1, 2023) (Doc. 257\_37).

Medical Education announced on February 26 that the poisoning of students in Borujerd was “caused by carbon monoxide gas and has nothing to do with the recent poisonings on Qom,”<sup>130</sup> apparently trying to downplay the possible linkage between poisoning attacks across the country. Yet this explanation had been refuted a day earlier by the local team that was investigating the incident,<sup>131</sup> as well as the Director General of the Lorestan Inspection Organization.<sup>132</sup> It was later also refuted by an unnamed official who said the heat had been shut off at Ahmadiyya (meaning carbon monoxide could not have been the source of the issue),<sup>133</sup> along with a doctor for one affected student who said the student’s symptoms could not have been caused by carbon monoxide poisoning.<sup>134</sup> A local Imam in his Friday prayer denounced local officials for sharing contradictory information, accusing them of losing the public’s trust.<sup>135</sup>

Yet officials continued to do so. On February 28, IRNA reported that Alireza Monadi, the head of the Parliament’s Education and Research Commission, announced that nitrogen gas (“N2”) was found to be present in schools in Qom, and implied that it may also be responsible for students’ poisoning in Borujerd.<sup>136</sup> Yet no evidence indicating that nitrogen gas was responsible for the poisonings in Borujerd was ever provided. Then, on March 3, Tasnim suggested that an oil tanker, which was accused of being responsible for a different poisoning incident in Pardis on February 28 (see below), had also driven to Borujerd, and it was plausible that the same tanker also poisoned students there by leaving open the door of the tanker so that poisonous gas leaked out.<sup>137</sup> Yet the specialized team allegedly deployed to Ahmadiyya the same day of the incident, according to the Deputy Mayor of Borujerd, did not find any evidence of gas leaks at the school. These statements appear to be no more than unsubstantiated false information, rather than evidence-supported explanations, a point raised by a local Ayatollah at the time during Friday sermon.<sup>138</sup>

In sum, despite public attention and a series of investigations announced by local and national officials, we did not find any public explanation for what happened at Ahmadiyya and 15

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<sup>130</sup> [\*The reason behind the poisoning of students in Borujerd requires investigation by specialized teams\*](#), IRNA (Feb. 26, 2023) (Doc. 255\_15).

<sup>131</sup> [\*Governor: Investigation of the poisoning of Borujerd students has been entrusted to specialists\*](#), IRNA (Feb. 25, 2023) (Doc. 255\_23) (reporting that a local “specialized” team had been dispatched to Ahmadiyya the afternoon of the incident, and found no traces of a gas leak).

<sup>132</sup> [\*Repeated serial poisoning in Borujerd / 44 more students were taken to the hospital\*](#), TASNIM (Feb. 25, 2023) (Doc. 255\_24) (quoting Saeed Razani, Director General of the Lorestan Inspection Organization, who said that unlike the first two incidents at Ahmadiyya, which were blamed on carbon monoxide leaks by state officials, the cause of this poisoning was “not clear”).

<sup>133</sup> [\*Stink Bombs: New details about the poisoning incident of schoolgirls at two high schools and one elementary school in Borujerd\*](#), HAM MIHAN (Feb. 27, 2023) (Doc. 255\_16) (also reporting a victim’s mother’s story, who told the news outlet that a doctor told her that her daughter’s symptoms could not have been from carbon monoxide poisoning).

<sup>134</sup> [\*Stink Bombs: New details about the poisoning incident of schoolgirls at two high schools and one elementary school in Borujerd\*](#), HAM MIHAN (Feb. 27, 2023) (Doc. 255\_16).

<sup>135</sup> [\*Video / Ayatollah Alavi Boroujerdi: Contradictory statements by officials regarding the poisoning of students increase public distrust\*](#), SHAF AQNA (Feb. 26, 2023) (Doc. 255\_29).

<sup>136</sup> [\*Release of N<sub>2</sub> gas was the cause of the students' poisoning\*](#), IRNA (Feb. 28, 2023) (Doc. 257\_38).

<sup>137</sup> [\*The suspicious fuel tanker from Pardis has also been traveling in Qom and Borujerd / Parking guards were also poisoned\*](#), TASNIM (Mar. 3, 2023) (Doc. 257\_34).

<sup>138</sup> [\*Video/ Ayatollah Alavi Boroujerdi: The conflicting statement of the authorities regarding the poisoning of students increases the "distrust" of the people\*](#), SHAF AQNA NEWS (Feb. 26, 2023) (255\_29).

Khordad girls' high schools in Borujerd, nor did we find reports that perpetrators were identified and arrested for these specific incidents. We also did not find evidence that officials took additional security measures to protect Ahmadiyya or 15 Khordad girls' high schools from future incidents.

### February 28, 2023: Khayyam Girls' High School, Pardis, Tehran Province

Two eyewitnesses interviewed separately by the BBC and the domestic reformist outlet Bahar News said that around 10 AM, something like a grenade was thrown into the school.<sup>139</sup> Then, around 11 AM, students at Khayyam Girls' High School began smelling varying odors: In one video, a girl can be heard saying in the background "my nose burned and it had a burning smell."<sup>140</sup> Students reported different odors: A student interviewed by state-affiliated news outlet Mehr several days later said the gas had a "bitter" odor,<sup>141</sup> a different student told Pardis TV that it smelled "like regular gas but more salty," and another student told Pardis TV in the same interview that the gas smelled "metallic."<sup>142</sup> A prominent blogger in Iran reported still another smell, claiming that the odor was like "rotten sewage."<sup>143</sup> Local officials, by contrast, asserted that it was a smell "like gas,"<sup>144</sup> disputing any different accounts from students about the odor.<sup>145</sup> After the odor spread throughout the school, the students exited.<sup>146</sup> Students interviewed by Pardis TV insisted that the smell originated inside the building and spread outwards, indicating the source was inside of the school rather than outside.<sup>147</sup> At least 35 students were taken to the

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<sup>139</sup> *N2 gas identified as the cause of student poisonings; Radan: No one has been arrested yet*, BAHAR NEWS (Feb. 28, 2023) (Doc. 357\_18); BBC Persian, TELEGRAM (Feb. 28, 2023) <https://t.me/bbcpersian/162576> (Doc. 357\_15).

<sup>140</sup> @Gozareshgar, YOUTUBE (Feb. 28, 2023) <https://www.youtube.com/watch?v=96gXmPik1Io> (Doc. 357\_01).

This time is confirmed by someone who filmed the scene and narrated, stating the date (9<sup>th</sup> of Esfand) and the time as 11 AM. *Id.*

<sup>141</sup> *The cause of the poisoning of students at Khayyam School in Pardis has been identified*, MEHR (Mar. 2, 2023) (Doc. 357\_21).

<sup>142</sup> *Khayyam Pardis School*, PARDIS TV (Mar. 1, 2023) <https://www.aparat.com/v/gpu8B> (Doc. 357\_13).

<sup>143</sup> Bahmran Rehmani, *The direct cause of the chain poisonings of students in girls' schools is the Islamic Republic!*, MASHHAL (Mar. 2, 2023) (Doc. 357\_19).

<sup>144</sup> *Details of the poisoning of students at Khayyam School in Pardis / County Deputy Governor for Political Affairs: There was no gas leak, but a smell similar to diesel and petroleum was detected*, ROUYDAD24 (Feb. 28, 2023) (Doc. 357\_16) (quoting Reza Karimi Saleh, Pardis County Deputy Governor for Political Affairs, who reported a smell of gas throughout the school, as well as an unnamed security official who told the news outlet that the area smelled like gas or oil).

<sup>145</sup> The next day, the IRIB published a video report interviewing several students in which the reporter asks, "it smelled like gas right?" and the student responded, "yes, gas," in what appears to have been a staged attempt to reshape the narrative. *Investigation into the cause of the poisoning of students at Khayyam School*, IRIB (Mar. 1, 2023) (Doc. 357\_14). Later, in the same interview, another girl tells the reporter that she "can't name what it smelled like," casting doubt that the odor was actually gas. *Id.*

<sup>146</sup> *What is the story behind the poisoning of students in Pardis?* TASNIM (Feb. 28, 2023) (Doc. 357\_23).

@Gozareshgar, YOUTUBE (Feb. 28, 2023) <https://www.youtube.com/watch?v=96gXmPik1Io> (Doc. 357\_01).

<sup>147</sup> *Khayyam Pardis School*, PARDIS TV (Mar. 1, 2023) <https://www.aparat.com/v/gpu8B> (Doc. 357\_13).

hospital after being “poisoned,” according to state-affiliated news outlets,<sup>148</sup> and while most were reported to have been discharged by 3 PM, two were held overnight.<sup>149</sup>

Several videos capture, from different vantage points, ambulances and emergency personnel on the scene,<sup>150</sup> along with girls in school uniforms streaming out of the school.<sup>151</sup> Several girls can be seen sitting on the ground struggling to breathe.<sup>152</sup> Another video shows, from far away, girls being helped out of the school courtyard by people holding them on either side.<sup>153</sup> They walk slowly, and one appears to walk with a limp.<sup>154</sup> In an interview with Pardis TV, one girl tells the reporter that students in her classroom began feeling sleepy, and were “in and out of being awake.”<sup>155</sup> In an interview with the IRIB, a mother tells the reporter that the girls were nauseous and lying down in the courtyard when she arrived at the school.<sup>156</sup>

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<sup>148</sup> *Head of Pardis Department of Education: The students are in stable condition*, IRNA (Feb. 28, 2023) (Doc. 357\_28) (reporting that 35 students were “poisoned due to gas poisoning”); *The general condition of the poisoned students from Khayyam School in Pardis is good / Some have been discharged*, ISNA (Feb. 28, 2023) (Doc. 357\_29) (reporting that a “number of students were poisoned by a gas leak”); *What is the story behind the poisoning of students in Pardis?* TASNIM (Feb. 28, 2023) (Doc. 357\_23) (reporting that students “suffered from gas poisoning”); *Student poisoning has reached Pardis / 37 students from Khayyam Girls' High School transferred to the hospital*, TASNIM (Feb. 28, 2023) (Doc. 357\_20) (saying that girls were “poisoned” and transferred to the hospital from Khayyam); *Video | Students recount the poisoning incident at Khayyam School in Pardis*, FARIS NEWS (Mar. 1, 2023) (Doc. 357\_02) (according to Deputy Governor, 37 students were taken to the hospital).

<sup>149</sup> *What is the story behind the poisoning of students in Pardis?* TASNIM (Feb. 28, 2023) (Doc. 357\_23) (reporting that most of the 35 students who were taken to the hospital were discharged by 3 PM); *Pardis County Governor: 35 poisoned students have been discharged from the hospital*, IRNA (Mar. 1, 2023) (Doc. 357\_22) (reporting that 2 students were held overnight due to pre-existing conditions).

<sup>150</sup> @Gozareshgar, YOUTUBE (Feb. 28, 2023) <https://www.youtube.com/watch?v=96gXmPik1Io> (Doc. 357\_01); @sobhepardis, X (Feb. 28, 2023) <https://x.com/sobhepardis/status/1630597957862019073> (Doc. 357\_04); @IranIntlTV, TELEGRAM (Feb. 28, 2023) <https://t.me/IranintlTV/164875> (Doc. 357\_05); @IranIntlTV, TELEGRAM (Feb. 28, 2023) <https://t.me/IranintlTV/164898> (Doc. 357\_06); @mizangorup, TELEGRAM (Feb. 28, 2023) <https://t.me/mizangorup/41692> (Doc. 357\_08); @masih\_alinejad, TELEGRAM (Feb. 28, 2023) [https://t.me/masih\\_alinejad/20510](https://t.me/masih_alinejad/20510) (Doc. 357\_09); @ManotoTV, TELEGRAM (Feb. 28, 2023) <https://t.me/ManotoTV/60050> (Doc. 357\_10); @ManotoTV, TELEGRAM (Feb. 28, 2023) <https://t.me/ManotoTV/60052> (Doc. 357\_11).

<sup>151</sup> @Gozareshgar, YOUTUBE (Feb. 28, 2023) <https://www.youtube.com/watch?v=96gXmPik1Io> (Doc. 357\_01); Doc. 357\_06; The uniforms match photos later shared by the state. See *Pardis County Governor: 35 poisoned students have been discharged from the hospital*, IRNA (Mar. 1, 2023) (Doc. 357\_22).

<sup>152</sup> @besmaili, X (Feb. 28, 2023) <https://x.com/besmaili/status/1630520873865101312> (Doc. 357\_03); @Gozareshgar, YOUTUBE (Feb. 28, 2023) <https://www.youtube.com/watch?v=96gXmPik1Io> (Doc. 357\_01).

<sup>153</sup> @masih\_alinejad, TELEGRAM (Feb. 28, 2023) [https://t.me/masih\\_alinejad/20510](https://t.me/masih_alinejad/20510) (Doc. 357\_09).

<sup>154</sup> @masih\_alinejad, TELEGRAM (Feb. 28, 2023) [https://t.me/masih\\_alinejad/20510](https://t.me/masih_alinejad/20510) (Doc. 357\_09).

<sup>155</sup> *Khayyam Pardis School*, PARDIS TV (Mar. 1, 2023) <https://www.aparat.com/v/gpu8B> (Doc. 357\_13).

<sup>156</sup> *Investigation into the cause of the poisoning of students at Khayyam School*, IRIB (Mar. 1, 2023) (Doc. 357\_14).





Source: @masih\_alinejad, TELEGRAM (Feb. 28, 2023) [https://t.me/masih\\_alinejad/20510](https://t.me/masih_alinejad/20510) (Doc. 357\_09).

Local officials were reported to have also been on the scene collecting samples from around the school and from affected girls, which were reportedly sent to specialized laboratories for examination.<sup>157</sup> One local task force was stood up to investigate the incident,<sup>158</sup> and a day later, a group met to discuss these and other similar recent incidents in Tehran.<sup>159</sup> Mohsen Pirhadi, an MP for Tehran, was particularly vocal about this and other recent cases that occurred in and around Tehran, emphasizing that “the reasons for the delay, the weak response, and the lack of serious attention by the relevant officials to this issue must be investigated. It must be clarified why a recurring incident that targets both the lives and health of the daughters of our land and the security of the country was not considered serious in the initial reports.”<sup>160</sup> He also stated that the repetition of these incidents, spreading from Qom to Borujerd to Pardis, “erase any doubt” that these incidents were not unintentional.<sup>161</sup> In light of this, he announced a parliamentary working group to examine the issue of poisonings in girls schools.<sup>162</sup>

Yet at the same time some local officials were focused on announcing investigations, other officials appeared to have tried to prevent information about the incident from spreading. In a March 1 article published by IRNA, the state-affiliated news outlet reported that the “security establishment” would be dealing with anyone caught spreading rumors about the poisoning incidents.<sup>163</sup> Following up on this, the mayor of Pardis announced that two people were caught filming the incident and sending the videos to “hostile networks,” and were summoned by the

<sup>157</sup> *Student poisoning has reached Pardis / 37 students from Khayyam Girls' High School transferred to the hospital*, TASNIM (Feb. 28, 2023) (Doc. 357\_20); *Deputy County Governor: Samples from the poisoned students of Pardis have been sent to the laboratory*, IRNA (Feb. 28, 2023) (Doc. 357\_27).

<sup>158</sup> *Deputy County Governor: Samples from the poisoned students of Pardis have been sent to the laboratory*, IRNA (Feb. 28, 2023) (Doc. 357\_27). The task force was reported to have been composed of the county health network, emergency services, and the Pardis county police command. *Id.*

<sup>159</sup> *Review of the student poisoning issue in some Tehran schools at the 'Tehran Provincial Security Council' meeting*, TASNIM (Mar. 1, 2023) (Doc. 357\_25).

<sup>160</sup> *Pirhadi: The Parliament is following up on the poisoning incident in girls' schools*, TASNIM (Mar. 1, 2023) (Doc. 357\_26).

<sup>161</sup> *Pirhadi: The Parliament is following up on the poisoning incident in girls' schools*, TASNIM (Mar. 1, 2023) (Doc. 357\_26).

<sup>162</sup> *Pirhadi: The Parliament is following up on the poisoning incident in girls' schools*, TASNIM (Mar. 1, 2023) (Doc. 357\_26).

<sup>163</sup> *Pardis County Governor: 35 poisoned students have been discharged from the hospital*, IRNA (Mar. 1, 2023) (Doc. 357\_22).

security services.<sup>164</sup> The threat to anyone attempting to share raw footage capturing the incident was clear.

Three days after the incident, on March 3, Pardis County Deputy Governor for Political Affairs, Reza Karimi Saleh, announced that authorities had a strong hunch about the cause of the incident and arrested a perpetrator.<sup>165</sup> Although they were not “100%” certain, Saleh said that officials believed the cause was an open door from a nearby fuel tank.<sup>166</sup> This caused the chemical Naphtha, a byproduct of crude oil, to leak out of the tanker and enter the school.<sup>167</sup> Officials claimed that they came to this conclusion after receiving reports from parking lot guards nearby who said they had been poisoned and taken to the hospital, where the tanker was parked. Officials also claim that they gathered parents, students, teachers, and administrators from Khayyam the day after the incident, who all admitted that they smelled gas in the school.<sup>168</sup> When interviewed by state media, the man allegedly responsible for the incident said “I didn’t do anything,” he simply didn’t close the door, which, according to him, was standard practice.<sup>169</sup> He said that while he didn’t know it is poisonous, he did know that Naphtha is highly flammable.<sup>170</sup>

While Naphtha can be dangerous at high concentrations and long periods of exposure,<sup>171</sup> the state’s version of what caused the girls’ poisoning has evidentiary gaps that cast serious doubt on this explanation. First, the odor from Naphtha is not aligned with what students themselves reported to state- and IRGC-affiliated news outlets. While students reported an odor that was “bitter” or “metallic,” Naphtha has a smell very similar to gasoline.<sup>172</sup> Second, Naphtha gas is

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<sup>164</sup> *Pardis County Governor: 35 poisoned students have been discharged from the hospital*, IRNA (Mar. 1, 2023) (Doc. 357\_22).

<sup>165</sup> *The suspicious fuel tanker from Pardis has also traveled to Qom and Borujerd / Parking guards were also poisoned*, TASNIM (Mar. 3, 2023) (Doc. 357\_24).

<sup>166</sup> *The cause of the poisoning of students at Khayyam School in Pardis has been identified*, MEHR (Mar. 2, 2023) (Doc. 357\_21).

<sup>167</sup> Chapter 2: Refinery Products and Byproducts in INTRODUCTION TO PETROLEUM BIOTECHNOLOGY 41, 42 (2018); *The cause of the poisoning of students at Khayyam School in Pardis has been identified*, MEHR (Mar. 2, 2023) (Doc. 357\_21).

<sup>168</sup> *The suspicious fuel tanker from Pardis has also traveled to Qom and Borujerd / Parking guards were also poisoned*, TASNIM (Mar. 3, 2023) (Doc. 357\_24); see also *Investigation into the cause of the poisoning of students at Khayyam School*, IRIB (Mar. 1, 2023) (Doc. 357\_14) (interviewing affected girls and the men who appear to be the alleged individuals from the parking lot, who claimed the day after the incident that the smell in the parking lot was the same as that in the school). Note however that in the same interview, the reporter appears to be pressuring the girls to say the smell was like gas. To one of the girls, the reporter asks, “it smelled like gas right?” and the student responded, “yes, gas,” but later, in the same interview, another girl tells the reporter that she “can’t name what it smelled like,” casting doubt that the odor was actually gas.

<sup>169</sup> *Investigation into the cause of the poisoning of students at Khayyam School*, IRIB (Mar. 1, 2023) (Doc. 357\_14); *The cause of the poisoning of students at Khayyam School in Pardis has been identified*, MEHR (Mar. 2, 2023) (Doc. 357\_21).

<sup>170</sup> *The cause of the poisoning of students at Khayyam School in Pardis has been identified*, MEHR (Mar. 2, 2023) (Doc. 357\_21).

<sup>171</sup> See *Known facts and uncertainties regarding the claim of the naphtha tanker’s role in the poisoning of female students*, FACTNAMEH (Mar. 2, 2023) (Doc. 357\_30); see also VM&P Naphtha, U.S. DEP’T OF LABOR OFFICE OF OCCUPATIONAL AND SAFETY HAZARDS <https://www.osha.gov/chemicaldata/707> (detailing exposure limits of 8-10 hours at high concentrations).

<sup>172</sup> *Known facts and uncertainties regarding the claim of the naphtha tanker’s role in the poisoning of female students*, FACTNAMEH (Mar. 2, 2023) (Doc. 357\_30) (detailing the differences between Naphtha and the Khayyam poisoning incident, and highlighting the scent as a key difference).

unlikely to cause poisoning symptoms unless it is inhaled for long periods at high concentrations.<sup>173</sup> Such concentrations would not, according to an organic chemistry researcher quoted by FactNameh, be possible to achieve without placing a lighter beneath the tanker and directing the gas towards the school.<sup>174</sup> The tanker driver interviewed by the state-affiliated news outlet Mehr does not mention lighting the gas on fire, and in fact himself highlights the fact that this gas is not known to be poisonous without fire. Third, there were no other reports of others in the area experiencing poisoning effects other than the alleged parking guards, despite several buildings and schools being nearby.<sup>175</sup> With regard to the parking guards allegedly poisoned, the state did not provide specifics about their poisonings or proof that they did experience symptoms beyond a televised interview. Together, these points cast serious doubt on the state's official explanation.

Further undermining the state's explanation, officials from the local gas agency reported there was no gas leak,<sup>176</sup> including in a live video filmed by someone not part of the state media apparatus.<sup>177</sup> In the video, the filmer asks a gas official "sir, what gas has leaked?" and the official replies, "nothing has leaked ma'am. It wasn't gas."<sup>178</sup> While this could simply mean that the gas company was not responsible for the incident, the conversation between the filmer and the gas official suggests that no gas leak, including a leak of a petrochemical substance like Naphtha, had caused the incident at Khayyam. Further contradicting the state's assertion, in an interview with Pardis TV, affected girls insist to the reporter that the smell originated inside of the school and spread outwards, which they knew because they had been outside playing volleyball, where they did not smell anything, and then came inside the school.<sup>179</sup>

No further details or explanation were provided by the state about this incident. The driver of the tanker was reportedly arrested, although we did not find further information about whether he was prosecuted in a court of law with due process. In addition, we did not find any information about security measures taken to prevent further incidents from occurring.

### March 1, 2023: 13 Aban Girls' Middle School, Tehranasar, Tehran Province

Sometime during the morning on March 1, 2023, girls from 13 Aban Girls' Middle School experienced symptoms of poisoning and at least three were sent to the hospital, as reported by

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<sup>173</sup> See *supra* note 171.

<sup>174</sup> *Known facts and uncertainties regarding the claim of the naphtha tanker's role in the poisoning of female students*, FACTNAMEH (Mar. 2, 2023) (Doc. 357\_30).

<sup>175</sup> *Known facts and uncertainties regarding the claim of the naphtha tanker's role in the poisoning of female students*, FACTNAMEH (Mar. 2, 2023) (Doc. 357\_30).

<sup>176</sup> *Details of the poisoning of students at Khayyam School in Pardis / Deputy County Governor for Political Affairs: There was no gas leak, but a smell similar to diesel and petroleum was detected*, ROUYDAD24 (Feb. 28, 2023) (Doc. 357\_16) (interviewing Reza Karimi Saleh, who says the local gas company told him that it wasn't a gas leak).

<sup>177</sup> @Gozareshgar, YOUTUBE (Feb. 28, 2023) <https://www.youtube.com/watch?v=96gXmPik1Io> (Doc. 357\_01); *Details of the poisoning of students at Khayyam School in Pardis / Deputy County Governor for Political Affairs: There was no gas leak, but a smell similar to diesel and petroleum was detected*, ROUYDAD24 (Feb. 28, 2023) (Doc. 357\_16).

<sup>178</sup> @Gozareshgar, YOUTUBE (Feb. 28, 2023) <https://www.youtube.com/watch?v=96gXmPik1Io> (Doc. 357\_01).

<sup>179</sup> *Khayyam Pardis School*, PARDIS TV (Mar. 1, 2023) (Doc. 357\_13).



state-affiliated news sources and other domestic news outlets.<sup>180</sup> An unnamed official at an unspecified Tehran hospital confirmed to a domestic news outlet that girls from the Tehran suburbs – where this school is located – were sent to the hospital with poisoning symptoms from inhaling gas.<sup>181</sup> A girl’s father who was interviewed by the Iran-based news outlet Shargh Daily told the reporter that when he arrived at the school, children were vomiting and their eyes were teary.<sup>182</sup> He said it smelled like rotten eggs.<sup>183</sup> Similarly, Dr. Hadi Abdollahi, an ER doctor who said he treated students from 13 Aban, said that the girls reported a “foul or rotting vegetable-like smell.”<sup>184</sup> A girl interviewed by the state-affiliated news agency Mehr told the reporter that she smelled “a really bad smell, like really spicy mint.”<sup>185</sup> And in an alleged interview with a student, an outlet based outside of Iran reported that the student smelled something like “boiled eggs or burnt sweets” around 8:30 AM.<sup>186</sup> ISNA, in an interview with two students from the school, similarly reported that there was a “bad smell” or a “bitter” smell before the students began feeling bad.<sup>187</sup>

A girl’s father interviewed by the reformist outlet Shargh Daily also told the reporter that according to several eyewitnesses and parents he spoke to, two women were seen arriving at the school and then running away to a car waiting for them right before the incident occurred.<sup>188</sup>

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<sup>180</sup> *Field report by a student journalist on the latest condition of the poisoned students of Shohada-ye 13 Aban School + video*, STUDENT NEWS NETWORK (Mar. 1, 2023) (Doc. 359\_09); *Two students from Tehran School recount their poisoning experience*, ISNA (Mar. 1, 2023) (Doc. 359\_23); *Hajer and 13 Aban schools were also added to the list of poisonings / The school officials were only trying to evacuate the school and calm the situation / The smell of rotten eggs filled the air / The children were foaming at the mouth*, SHARGH DAILY (Mar. 1, 2023) (Doc. 359\_32); *Accounts of the female students of 13 Aban High School about the poisoning*, MEHR (Mar. 4, 2023) (Doc. 359\_31); @shahedkhabarr, INSTAGRAM (Mar. 2, 2023) <https://www.instagram.com/shahedkhabarr/p/CpSEcqdE8H/> (Doc. 359\_30); *The latest news on the poisoning of students today, 10 Esfand 1401 (March 1, 2023)*, TEJARAT NEWS (Mar. 1, 2023) (Doc. 359\_08); *Transfer of 4 students to the hospital in today’s poisoning incident at Tehran schools*, TASNIM (Mar. 1, 2023) (Doc. 359\_36). A mother told Mehr that her friend called her at 9:30 AM to tell her something had happened at the school. *Accounts of the female students of 13 Aban High School about the poisoning*, MEHR (Mar. 4, 2023) (Doc. 359\_31). Another news outlet reported to have interviewed a student said that the incident occurred around 8:30 AM. @Rfrenss, X (Mar. 1, 2023) <https://twitter.com/Rfrenss/status/1631007102968778765> (Doc. 359\_17).

<sup>181</sup> @shahedkhabarr, INSTAGRAM (Mar. 2, 2023) <https://www.instagram.com/shahedkhabarr/p/CpSEcqdE8H/> (Doc. 359\_30).

<sup>182</sup> *Hajer and 13 Aban Schools Also Added to the List of Poisonings/ School officials were only focused on evacuating the school and calming the situation/ The smell of rotten eggs filled the air/ The children were foaming at the mouth*, SHARGH DAILY (Mar. 1, 2023) (Doc. 359\_32).

<sup>183</sup> *Hajer and 13 Aban Schools Also Added to the List of Poisonings/ School officials were only focused on evacuating the school and calming the situation/ The smell of rotten eggs filled the air/ The children were foaming at the mouth*, SHARGH DAILY (Mar. 1, 2023) (Doc. 359\_32).

<sup>184</sup> *The mystery of the unknown gas*, HAM-MIHAN (Mar. 4, 2023).

<sup>185</sup> *Accounts of the female students of 13 Aban High School about the poisoning*, MEHR (Mar. 4, 2023) (Doc. 359\_31).

<sup>186</sup> @Rfrenss, X (Mar. 1, 2023) <https://twitter.com/Rfrenss/status/1631007102968778765> (Doc. 359\_17).

<sup>187</sup> *Two students from Tehran School recount their poisoning experience*, ISNA (Mar. 1, 2023) (Doc. 359\_23); see also *Field report by a student journalist on the latest condition of the poisoned students of Shohada-ye 13 Aban School + video*, STUDENT NEWS NETWORK (Mar. 1, 2023) (Doc. 359\_09) (reporting that there was a strange smell and that no explosion occurred nor was there something thrown inside of the school).

<sup>188</sup> *Hajer and 13 Aban Schools Also Added to the List of Poisonings/ School officials were only focused on evacuating the school and calming the situation/ The smell of rotten eggs filled the air/ The children were foaming at the mouth*, SHARGH DAILY (Mar. 1, 2023) (Doc. 359\_32).

Bystanders suspected those individuals may have been responsible for the incident, although we did not find other evidence indicating as much.<sup>189</sup>

Videos taken in front of 13 Aban Girls' School show at least one girl splayed on the ground, appearing unable to move or unconscious, surrounded by adults as a medical professional leans over to pick her up and an ambulance waits in the background.<sup>190</sup> Other reporting lists girls' symptoms as including hurt throats, nausea, vomiting, body pain, teary eyes, and light-headedness.<sup>191</sup> A school administrator told state-affiliated news that several children had asthma attacks and that one teacher was sent home for feeling unwell.<sup>192</sup> Videos taken in front of 13 Aban also show ambulances in front of the school,<sup>193</sup> although the school administrator interviewed by state-affiliated news outlet Mehr claimed that only about four people from the incident were hospitalized.<sup>194</sup> Reporters claimed to have been prevented by authorities from conducting interviews with the affected students and their families.<sup>195</sup>



Source: @radiojibi, X (Mar. 1, 2023)

<https://x.com/radiojibi/status/1630979646136229888> (Doc. 359\_01).

Following the incident, there appears to have been an outcry among parents and bystanders, and videos documented protests that formed in front of the school.<sup>196</sup> In one video, girls can be heard

<sup>189</sup> *Hajer and 13 Aban Schools Also Added to the List of Poisonings/ School officials were only focused on evacuating the school and calming the situation/ The smell of rotten eggs filled the air/ The children were foaming at the mouth*, SHARGH DAILY (Mar. 1, 2023) (Doc. 359\_32).

<sup>190</sup> @radiojibi, X (Mar. 1, 2023) <https://x.com/radiojibi/status/1630979646136229888> (Doc. 359\_01).

<sup>191</sup> *Hajer and 13 Aban Schools Also Added to the List of Poisonings/ School officials were only focused on evacuating the school and calming the situation/ The smell of rotten eggs filled the air/ The children were foaming at the mouth*, SHARGH DAILY (Mar. 1, 2023) (Doc. 359\_32) (parent eyewitness says his child was nauseous, others were vomiting and had teary eyes); *The latest news on the poisoning of students today, 10 Esfand 1401 (March 1, 2023)*, TEJARAT NEWS (Mar. 1, 2023) (Doc. 359\_08) (claimed that protesters told the reporter that students had symptoms including burning eyes, throat, and body pain); *Accounts of the female students of 13 Aban High School about the poisoning*, MEHR (Mar. 4, 2023) (Doc. 359\_31) (lightheadedness).

<sup>192</sup> *Accounts of the female students of 13 Aban High School about the poisoning*, MEHR (Mar. 4, 2023) (Doc. 359\_31).

<sup>193</sup> @AlinejadMasih, X (Mar. 1, 2023) <https://x.com/AlinejadMasih/status/1630885162333487104> (Doc. 359\_02).

<sup>194</sup> *Accounts of the female students of 13 Aban High School about the poisoning*, MEHR (Mar. 4, 2023) (Doc. 359\_31).

<sup>195</sup> *Field report by a student journalist on the latest condition of the poisoned students of Shohada-ye 13 Aban School + video*, STUDENT NEWS NETWORK (Mar. 1, 2023) (Doc. 359\_09).

<sup>196</sup> @AlinejadMasih, X (Mar. 1, 2023) <https://x.com/AlinejadMasih/status/1630885162333487104> (Doc. 359\_02); @iranwire, X (Mar. 1, 2023) <https://x.com/iranwire/status/1631181376744574976> (Doc. 359\_04), @bbcpersian, X

chanting “Woman Life Freedom” in front of the school.<sup>197</sup> In another, women – presumably mothers – can be seen in front of the school chanting “death to the dictator, death to the authority that kills children.”<sup>198</sup> At the end of the video one woman can be heard saying, “It’s enough. We have to get up ... they will take us to the hospital one by one.”<sup>199</sup>

According to eyewitnesses interviewed by Shargh Daily that day, there were plain clothes security officers present observing the incident as it unfolded, some of whom ordered people not to chant.<sup>200</sup> These witnesses did not specify from which branch of the security services these officers came. State-affiliated Tasnim also confirmed there were “about 10” officers present, but claimed they were police.<sup>201</sup> Video evidence also captured what appear to be security officials dressed in plain clothes, including two hanging around the school, one of whom was dressed in camouflage.<sup>202</sup> It is unclear whether they are from the local police or from a different security agency like the IRGC or its internal subsidiary the Basij.<sup>203</sup> Domestic news outlet Student News Network (SNN) claimed that its reporters were barred by officials at the scene from interviewing students or families, although they do not specify which officials prevented them from doing so.<sup>204</sup>

At some point in the afternoon the situation escalated, and a mother of one of the affected girls was filmed being violently abused by a group of men including, it appears, the two aforementioned men filmed hanging around the school.<sup>205</sup> Despite the known presence of officers, the following day, Tasnim denied that the men responsible for the mother’s abuse were police or otherwise affiliated with the state, stating that the Greater Tehran Police Commander claimed “no role, either direct or indirect” in the beating of the woman in front of 13 Aban School.<sup>206</sup> Tasnim further announced the arrest of four men who were not security officials or

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(Mar. 1, 2023) <https://x.com/bbcpersian/status/1630943206048137216> (Doc. 359\_16); @radiofarda, TELEGRAM

(Mar. 1, 2023) <https://t.me/radiofarda/100257> (Doc. 359\_21).

<sup>197</sup> @bbcpersian, X (Mar. 1, 2023) <https://x.com/bbcpersian/status/1630943206048137216> (Doc. 359\_16).

<sup>198</sup> @iranwire, X (Mar. 1, 2023) <https://x.com/iranwire/status/1631181376744574976> (Doc. 359\_04).

<sup>199</sup> @iranwire, X (Mar. 1, 2023) <https://x.com/iranwire/status/1631181376744574976> (Doc. 359\_04).

<sup>200</sup> *Hajer and 13 Aban Schools Also Added to the List of Poisonings/ School officials were only focused on evacuating the school and calming the situation/ The smell of rotten eggs filled the air/ The children were foaming at the mouth*, SHARGH DAILY (Mar. 1, 2023) (Doc. 359\_32).

<sup>201</sup> *Tasnim reporter’s account from in front of a school in Tehran’s Tehransar neighborhood / The complex mystery of student poisonings*, TASNIM (Mar. 2, 2023) (Doc. 359\_29).

<sup>202</sup> @ICHRI, X (Mar. 1, 2023) <https://x.com/ICHRI/status/1631311955288784896> (Doc. 359\_05). The men are not in discernible uniforms but one is in full camouflage, suggesting affiliation with an internal security force. The other is in a tailored suit.

<sup>203</sup> The Basij is a paramilitary force situated under the IRGC that is focused on internal threats to the regime. See *The Islamic Revolutionary Guard Corps (IRGC)*, COUNCIL ON FOREIGN RELATIONS (June 13, 2025) <https://www.cfr.org/backgrounder/irans-revolutionary-guards#chapter-title-0-5>.

<sup>204</sup> *Field report by a student journalist on the latest condition of the poisoned students of Shohada-ye 13 Aban School + video*, STUDENT NEWS NETWORK (Mar. 1, 2023) (Doc. 359\_09).

<sup>205</sup> @ICHRI, X (Mar. 1, 2023) <https://x.com/ICHRI/status/1631311955288784896> (Doc. 359\_05). Although several news agencies later denied that she was a parent, including Fars, followed by ISNA, Mehr, Sedasima, and Mashreq, Tasnim had confirmed she was a parent of a child at 13 Aban in an earlier Telegram post. See *The other side of a woman being beaten in front of a girls’ school / When will the plainclothes forces be held accountable?* ROUYDAD24 (Mar. 4, 2023) (Doc. 359\_34).

<sup>206</sup> *Police response to the beating of a woman in front of 13 Aban School*, TASNIM (Mar. 2, 2023) (Doc. 359\_28).

police responding to the incident.<sup>207</sup> Yet given that one man was filmed in camouflage, it is likely that at least one man was somehow affiliated with the police or another internal security force.<sup>208</sup>



Source: @ICHRI, X (Mar. 1, 2023) <https://x.com/ICHRI/status/1631311955288784896> (Doc. 359\_05).

Tasnim, which had initially announced the poisoning incident at 13 Aban Girls' Middle School,<sup>209</sup> published a second article that cast doubt on the entire poisoning incident.<sup>210</sup> In that article, the Tasnim reporter claimed they saw “no ambulances and no students experiencing poisoning.”<sup>211</sup> The reporter claimed to have spoken to a teacher from another school, who told the reporter that there was in fact no such event, and this unnamed teacher questioned whether or not any students had been taken to the hospital from 13 Aban at all.<sup>212</sup> Yet this account is not only disputed by video evidence, but is also disputed by several other Iranian news agencies, including state-affiliated ISNA and Mehr News, which both reported that students from 13 Aban were sent to the hospital with symptoms of poisoning.<sup>213</sup>

<sup>207</sup> *Four people arrested in the case of a woman being beaten in front of 13 Aban School*, TASNIM (Mar. 2, 2023) (Doc. 359\_27).

<sup>208</sup> @ICHRI, X (Mar. 1, 2023) <https://x.com/ICHRI/status/1631311955288784896> (Doc. 359\_05); *see also* @mizangorup, TELEGRAM (Mar. 2, 2023) <https://t.me/mizangorup/41812> (Doc. 359\_22); *The interesting story of choosing green uniforms for the IRGC | The story of the Basij leopard uniform | What uniforms should military personnel wear?*, HAM SHAHRI (Dec. 12, 2023) (describing Basij uniforms as transitioning to be different types of camouflage uniforms, including the “leopard” or “digital” prints).

<sup>209</sup> *Transfer of 4 students to the hospital in today's poisoning incident at Tehran schools*, TASNIM (Mar. 1, 2023) (Doc. 359\_36).

<sup>210</sup> *Tasnim reporter's account from in front of a school in Tehran's Tehransar neighborhood / The complex mystery of student poisonings*, TASNIM (Mar. 1, 2023) (Doc. 359\_29).

<sup>211</sup> *Tasnim reporter's account from in front of a school in Tehran's Tehransar neighborhood / The complex mystery of student poisonings*, TASNIM (Mar. 1, 2023) (Doc. 359\_29).

<sup>212</sup> *Tasnim reporter's account from in front of a school in Tehran's Tehransar neighborhood / The complex mystery of student poisonings*, TASNIM (Mar. 1, 2023) (Doc. 359\_29).

<sup>213</sup> @shahedkhabarr, INSTAGRAM (Mar. 2, 2023) <https://www.instagram.com/shahedkhabarr/p/CpSEcqdTE8H/> (Doc. 359\_30); *The latest news on the poisoning of students today, 10 Esfand 1401 (March 1, 2023)*, TEJARAT NEWS (Mar. 1, 2023) (Doc. 359\_08); *Field report by a student journalist on the latest condition of the poisoned students of Shohada-ye 13 Aban School + video*, STUDENT NEWS NETWORK (Mar. 1, 2023) (Doc. 359\_09); *Two students from Tehranser School recount their poisoning experience*, ISNA (Mar. 1, 2023) (Doc. 359\_23). Several videos also confirm girls were in the hospital, although we weren't able to verify whether they were from 13 Aban. *See id*; *see also* @IranIntl, X (Mar. 1, 2023) <https://x.com/IranIntl/status/1630904466655571970?s=20> (Doc. 359\_12).



One day later, the prosecutor for Tehran Ali Salehi announced that a special branch of the prosecutor's office would investigate the student poisoning incidents that had been reported in Tehran.<sup>214</sup> Yet despite this, we did not find any public results of this investigation nor an explanation of what caused this incident. We also did not find evidence that officials took additional security measures to protect 13 Aban Girls' Middle School from future incidents.

### March 5, 2023: Hazarat Zeyneb Girls' High School, Ramhormoz, Khouzestan Province

On March 4, hundreds of girls were reported by state-affiliated media to have been poisoned in schools across Khouzestan Province.<sup>215</sup> Ignoring these reports, however, Khouzestan officials announced that schools would remain open.<sup>216</sup> Unfortunately, the failure to close schools meant that another incident occurred. Around 10:30 am on March 5, 2023, according to the mayor of Ramhormoz, Mohammad Shahb Azad, a number of students at Hazarat Zeynab Girls' High School began "showing signs of lethargy" and "shortness of breath."<sup>217</sup> 115 girls were "poisoned" from this school, according to state-affiliated media, and were sent to the hospital for "shortness of breath."<sup>218</sup> Videos and photos show an ambulance parked outside of the school gates or leaving the school, confirming that students were transferred from the school to the hospital.<sup>219</sup> Police were also present at the school at the time ambulances were pulling out.<sup>220</sup>

Videos taken at Madar Hospital, where the girls were taken,<sup>221</sup> show girls being carried by adults into the hospital, potentially because they are dizzy, unconscious, or otherwise having difficulty

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<sup>214</sup> *Dismissal of two government officials / Prosecutor's office intervenes in student poisoning case / One person arrested in the Sama Jahanbaz case*, ISNA (Mar. 3, 2023) (Doc. 359\_35). Over 30 separate incidents had been reported in Tehran Province by March 8, 2023. See Mahmoud Azimae, *Schools' Poison Tracker* <https://sites.google.com/view/poison-tracker/english?authuser=0>.

<sup>215</sup> *Poisoning of 115 female students in Ramhormoz*, ISNA (Mar. 5, 2023) (Doc. 184\_10) (reporting that 312 students across Khouzestan were "poisoned" on March 4); *Schools in Khuzestan are not closed on Monday*, IRNA (Mar. 5, 2023) (Doc. 184\_27) (reporting that 700 students as of March 4 had been poisoned across Khouzestan).

<sup>216</sup> *Schools in Khuzestan are not closed on Monday*, IRNA (Mar. 5, 2023) (Doc. 184\_27) (quoting Dr. Habib Haibar, a spokesperson for the Ahvaz Jundishapur University of Medical Sciences, who said that "no instructions had been announced so far for the closure of schools.").

<sup>217</sup> *More than 60 critically ill students in Ramhormoz were sent to medical centers*, IRIB (Mar. 5, 2023) (Doc. 184\_22).

<sup>218</sup> *Poisoning of 115 female students in Ramhormoz*, ISNA (Mar. 5, 2023) (Doc. 184\_10); see also *More than 60 critically ill students in Ramhormoz were sent to medical centers*, IRIB (Mar. 5, 2023) (Doc. 184\_22) (confirming over 60 girls were sent to the hospital due to "shortness of breath" and "lethargy"); *Mass poisoning of students in Khuzestan + video of the latest condition of the patients*, TASNIM (Mar. 5, 2023) (Doc. 184\_28) (reporting that "similar incidents" had been reported in Ramhormoz as the "mass poisoning" incidents that occurred on March 4).

<sup>219</sup> @ManotoNews, X (Mar. 5, 2023) <https://twitter.com/ManotoNews/status/1632355696091234306> (Doc. 184\_18); @poshtpardeha, TELEGRAM (Mar. 5, 2023) <https://t.me/poshtpardeha/182727> (Doc. 184\_13); @rkzasafari, X (Mar. 5, 2023) <https://twitter.com/rkzasafari/status/1632326910196736000> (Doc. 184\_11); @poshtpardeha, TELEGRAM (Mar. 5, 2023) <https://t.me/poshtpardeha/182730> (Doc. 184\_14).

<sup>220</sup> @poshtpardeha, TELEGRAM (Mar. 5, 2023) <https://t.me/poshtpardeha/182727> (Doc. 184\_13); @ManotoNews, X (Mar. 5, 2023) <https://twitter.com/ManotoNews/status/1632355696091234306> (Doc. 184\_18); *More than 60 critically ill students in Ramhormoz were sent to medical centers*, IRIB (Mar. 5, 2023) (Doc. 184\_22).

<sup>221</sup> *More than 60 critically ill students in Ramhormoz were sent to medical centers*, IRIB (Mar. 5, 2023) (Doc. 184\_22).

walking.<sup>222</sup> Other videos show girls coughing and struggling to breathe as they went into the emergency room.<sup>223</sup> The hospital waiting room area is shown in a video filled with waiting adults, presumably parents and other custodians, indicating the scale of this incident.<sup>224</sup> State-affiliated media reports that all but “15 or 16” girls remained in the hospital after a few hours, but no further details about the length of their hospital stay are provided.<sup>225</sup>



Source: @HengawO, X (Mar. 5, 2023) <https://twitter.com/HengawO/status/1632314794278547456> (Doc. 184\_09).

For their part, officials promised the public that an investigation was underway and that the cause of the incident would be released to the public.<sup>226</sup> Yet officials contradicted each other about possible causes and ultimately failed to provide a clear explanation. The Mayor of Ramhormoz explained on the day the incident occurred that the cause appeared to be a powder-like substance in front of the school doors,<sup>227</sup> but he was contradicted by the Provincial Governor of Khuzestan, who told ISNA the same day that the cause, according to an ongoing investigation, was not in fact this substance, and that officials were continuing to investigate.<sup>228</sup> In addition, photos taken inside of the school that were posted on social media a year later indicate that CCTV cameras were likely installed in classrooms in the school at the time, suggesting that the state could have had access to important evidence about the incident.<sup>229</sup> But the cameras were never reported to have been used for the investigation.

Two days later, on March 7, the Ministry of Interior announced that a number of people allegedly involved in the poisonings were arrested, including in Khuzestan Province, for

<sup>222</sup> @Farsi\_Iranwire, TELEGRAM (Mar. 5, 2023) [https://t.me/Farsi\\_Iranwire/63071](https://t.me/Farsi_Iranwire/63071) (Doc. 184\_01) (not fully geolocated); @HengawO, X (Mar. 5, 2023) <https://twitter.com/HengawO/status/1632314794278547456> (Doc. 184\_09).

<sup>223</sup> @1500tasvir, TELEGRAM (Mar. 5, 2023) <https://t.me/t1500tasvir/5991> (Doc. 184\_16).

<sup>224</sup> @VOAFarsi, YOUTUBE (Mar. 5, 2023) <https://www.youtube.com/watch?v=QhExCDAh5O0> (Doc. 184\_07) (partially geolocated); @Kampaign, YOUTUBE (Mar. 5, 2023) <https://www.youtube.com/watch?v=68Is0G7gvPA> (Doc. 184\_08); @Eterazebazar, TELEGRAM (Mar. 5, 2023) <https://t.me/Eterazebazar/112821> (Doc. 184\_17); @Nafas62220, X (Mar. 5, 2023) <https://x.com/Nafas62220/status/1632505876736012289> (Doc. 184\_24).

<sup>225</sup> *Poisoning of 115 female students in Ramhormoz*, ISNA (Mar. 5, 2023) (Doc. 184\_10).

<sup>226</sup> *Ramhormoz County Governor: The general condition of the poisoned students is good*, AKHARIN KHABAR (Mar. 5, 2023) (Doc. 184\_25).

<sup>227</sup> *Id.*

<sup>228</sup> *Poisoning of 115 female students in Ramhormoz*, ISNA (Mar. 5, 2023) (Doc. 184\_10).

<sup>229</sup> @Sofal\_Hezaare, INSTAGRAM (Feb. 4, 2024) [https://www.instagram.com/reel/C29M7NUoyEf/?utm\\_source=ig\\_web\\_copy\\_link](https://www.instagram.com/reel/C29M7NUoyEf/?utm_source=ig_web_copy_link) (Doc. 184\_21).

preparing and distributing “materials” among students.<sup>230</sup> The only details released about these arrests, though, were that one person was arrested for taking a video in the school and hospital,<sup>231</sup> raising doubts about whether the perpetrators of this incident had in fact been identified. While the Ministry promised to make information about the arrests public after the investigation into the poisonings finished, no results were ever made public, nor were details released about the arrests.

In sum, despite the possibility of obtaining potential evidence via CCTV footage, we did not find an explanation for what occurred at Hazarat Zeyneb High School in Ramhormoz on March 5. Nor did we find reports that officials took additional security measures to protect the school from additional incidents.

### April 8, 2023: Sema Girls’ High School, Ardebil City, Ardebil Province

On the morning of April 8, high school students at Sema Girls’ High School were poisoned for the second time in five weeks.<sup>232</sup> According to Ali Mahboubipour, Director General of Security and Law of Ardabil Province, in an interview with ISNA, “this morning, students faced an unpleasant smell, a burning sensation in the throat, and lethargy;”<sup>233</sup> he later explained that the students “have been poisoned.”<sup>234</sup> Similarly, the head of Ardebil Provincial Medical Emergency Center told the domestic news outlet Aftab News that he started getting calls around 9 AM from five girls’ schools around Ardebil.<sup>235</sup> He reported that the schoolgirls had symptoms of “anxiety, shortness of breath, and headaches,” and that the girls were in “bad condition,” although in the same interview he contradicted this by stating that most girls’ symptoms had been caused by anxiety and fear.<sup>236</sup> According to ISNA, 175 girls across five schools, including Sema Girls’ High School, were sent to the hospital.<sup>237</sup>

Multimedia evidence shows girls outside of Sema Girls’ High School in the courtyard or in the front of the school, many still in their uniforms, struggling to breathe and coughing.<sup>238</sup> One student is filmed lying down with her eyes closed in front of the school surrounded by what appear to be parents and other students.<sup>239</sup> Several other girls are filmed laying on the ground,<sup>240</sup>

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<sup>230</sup> *Arrests of people linked to student poisoning in 6 provinces*, ISNA (Mar. 7, 2023) (Doc. 184\_29).

<sup>231</sup> *Id.*

<sup>232</sup> *Poisoning of schoolgirls in Ardabil, Khuzestan, and Urmia*, AFTAB NEWS (Apr. 8, 2023) (Doc. 40\_25); *Serial poisoning of schoolgirls reaches Ardabil / 108 students transferred to hospital*, IRNA (Mar. 1, 2023) (Doc. 40\_26) (IRNA confirming that girls at Sema girls’ school had been “poisoned” on March 1, 2023).

<sup>233</sup> *Poisoning of students in some schools in Ardabil*, ISNA (Apr. 8, 2023) (Doc. 40\_27).

<sup>234</sup> *Id.*

<sup>235</sup> *Poisoning of schoolgirls in Ardabil, Khuzestan, and Urmia*, AFTAB NEWS (Apr. 8, 2023) (Doc. 40\_25).

<sup>236</sup> *Poisoning of schoolgirls in Ardabil, Khuzestan, and Urmia*, AFTAB NEWS (Apr. 8, 2023) (Doc. 40\_25); *Poisoning of students in some schools in Ardabil*, ISNA (Apr. 8, 2023) (Doc. 40\_27).

<sup>237</sup> *Poisoning of students in some schools in Ardabil*, ISNA (Apr. 8, 2023) (Doc. 40\_27).

<sup>238</sup> @FatPixelFat, X (Apr. 8, 2023) <https://x.com/FatpixelFat/status/1644784349382955009?s=20> (Doc. 40\_06); @mizangorup, TELEGRAM (Apr. 8, 2023) <https://t.me/mizangorup/43860> (Doc. 40\_18); @mizangorup, TELEGRAM (Apr. 8, 2023) <https://t.me/mizangorup/43860> (Doc. 40\_19); @mizangorup, TELEGRAM (Apr. 8, 2023) <https://t.me/mizangorup/43860> (Doc. 40\_20); @mizangorup, TELEGRAM (Apr. 8, 2023) <https://t.me/mizangorup/43860> (Doc. 40\_22).

<sup>239</sup> @mizangorup, TELEGRAM (Apr. 8, 2023) <https://t.me/mizangorup/43860> (Doc. 40\_19).

<sup>240</sup> @FatPixelFat, X (Apr. 8, 2023) <https://x.com/FatpixelFat/status/1644784349382955009?s=20> (Doc. 40\_02); @FatPixelFat, X (Apr. 8, 2023) <https://x.com/FatpixelFat/status/1644784349382955009?s=20> (Doc. 40\_06).



and two had to be helped down the stairs and across the street, appearing to struggle to walk, lining up with reports that the girls experienced leg weakness.<sup>241</sup> One video shows an ambulance and a girl getting inside of it with the school's sign visible in the background, confirming that girls from Sema were part of the total number of students taken to the hospital.<sup>242</sup>



Source: @mizangorup, TELEGRAM (Apr. 8, 2023) <https://t.me/mizangorup/43860> (Doc. 40\_19).

In one particularly vivid series of videos, a schoolgirl is seen on her back coughing and struggling to breathe, her face reddened.<sup>243</sup> In the next, she's seen being helped walk across the street while leaning over and coughing, also appearing to have trouble walking while being accompanied by what appears to be an EMT.<sup>244</sup> A girl behind the camera can be heard yelling, "she can't breathe!"<sup>245</sup> In the third video, she can be seen leaning over the hood of a car coughing before getting into another car.<sup>246</sup> Parents, for their part, appear frantic and frustrated; one video appears to show parents fighting with a teacher or school administrator, incomprehensibly screaming at him.<sup>247</sup>

This was the second time in five weeks that Sema Girls' High School had experienced an alleged poisoning.<sup>248</sup> Yet despite this, we did not find any announcements of additional security measures to prevent additional incidents from happening at the school. We also did not find any information about investigations to follow-up on this incident or a public explanation for what happened.

<sup>241</sup> @FatPixelFat, X (Apr. 8, 2023) <https://x.com/FatpixelFat/status/1644784349382955009?s=20> (Doc. 40\_04); @FatPixelFat, X (Apr. 8, 2023) <https://x.com/FatpixelFat/status/1644784349382955009?s=20> (Doc. 40\_06); @mizangorup, TELEGRAM (Apr. 8, 2023) <https://t.me/mizangorup/43860> (Doc. 40\_18); @mizangorup, TELEGRAM (Apr. 8, 2023) <https://t.me/mizangorup/43860> (Doc. 40\_20); @mizangorup, TELEGRAM (Apr. 8, 2023) <https://t.me/mizangorup/43860> (Doc. 40\_22).

<sup>242</sup> @mizangorup, TELEGRAM (Apr. 8, 2023) <https://t.me/mizangorup/43860> (Doc. 40\_21).

<sup>243</sup> @FatPixelFat, X (Apr. 8, 2023) <https://x.com/FatpixelFat/status/1644784349382955009?s=20> (Doc. 40\_06).

<sup>244</sup> @mizangorup, TELEGRAM (Apr. 8, 2023) <https://t.me/mizangorup/43860> (Doc. 40\_22).

<sup>245</sup> *Id.*

<sup>246</sup> @mizangorup, TELEGRAM (Apr. 8, 2023) <https://t.me/mizangorup/43860> (Doc. 40\_20).

<sup>247</sup> @FatPixelFat, X (Apr. 8, 2023) <https://x.com/FatpixelFat/status/1644784349382955009?s=20> (Doc. 40\_01).

<sup>248</sup> *Serial poisoning of schoolgirls reaches Ardabil / 108 students transferred to hospital*, IRNA (Mar. 1, 2023) (Doc. 40\_26).

### April 9, 2023: Ma'raj Girls' High School, Saqqez, Kurdistan

On Sunday, April 9, 2023, according to the reformist Iran-based news outlet Didban Iran and an Iranian Teachers' Union, along with the BBC, Iran Wire, Iran International, HRANA, and Kurdistan24, as well as a local journalist based in Saqqez reporting separately for Iran Wire, a poisoning incident occurred at Ma'raj Girls' High School.<sup>249</sup> According to an eyewitness who spoke with the local journalist, a "loud voice" was heard a few minutes before the morning class ended.<sup>250</sup> A smell like "hot pepper" then filled the air.<sup>251</sup> Despite feeling sick, the eyewitness told the reporter that she and other students were prevented from going out into the schoolyard to get fresh air.<sup>252</sup>

Several videos filmed from different angles in front of the school show an ambulance and a crowd of girls in uniforms and adults gathered in front of the school.<sup>253</sup> In one particularly harrowing video, at least two men are seen carrying girls into cars presumably to take them to the hospital.<sup>254</sup> While we cannot know for certain without speaking to the girls affected, it is possible the girls were unable to move due to loss of limb movement, loss of consciousness, limited oxygen, or other issues. The local journalist reports that other eyewitnesses reported that many students were having difficulty breathing; according to a father who went to retrieve his daughter from inside of the school, his daughter was "dizzy and nauseous" and unable to walk when he found her.<sup>255</sup>

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<sup>249</sup> *Poisoning of students at several schools in Saqqez + video*, DIDBAN IRAN (Apr. 9, 2023) (Doc. 220\_24); *Reports of student poisonings and citizen protests in Saqqez and several other cities*, BBC (Apr. 9, 2023) (Doc. 220\_17); *Chemical attacks on girls' schools; security forces open fire on protesters in Saqqez*, IRAN INT'L (Apr. 9, 2023) (Doc. 220\_02); *Poisoning of "more than 100 students" in Saqqez: protesters took down the flag of the Islamic Republic*, VOA (Apr. 9, 2023) (Doc. 220\_16); *Student poisonings: protesters in Saqqez chanted "Death to Khamenei"*, IRAN WIRE (Apr. 9, 2023) (Doc. 220\_18); *Poisoning of more than 100 schoolgirls in Saqqez / Arrest of several concerned parents*, HRANA (Apr. 9, 2023) (Doc. 220\_26); *The poisoning of students at 6 girls' schools in Saqqez led to public protests in the city*, KURDISTAN24 (Apr. 10, 2023) (Doc. 220\_27); Coordinating Council of Iranian Teachers' Trade Associations, TELEGRAM (Apr. 9, 2023) <https://t.me/kashowra/16099> (Doc. 220\_29); Citizen Journalist, *Anger over Saqqez School Poisonings Triggers more Security, Censorship*, IRAN WIRE (Apr. 10, 2023) (Doc. 220\_30).

<sup>250</sup> Citizen Journalist, *Anger over Saqqez School Poisonings Triggers more Security, Censorship*, IRAN WIRE (Apr. 10, 2023) (Doc. 220\_30).

<sup>251</sup> *Id.*

<sup>252</sup> *Id.*

<sup>253</sup> @HengawO, X (Apr. 9, 2023) <https://twitter.com/HengawO/status/1644998757384159233> (Doc. 220\_01); @begoonahl, X (Apr. 9, 2023) <https://twitter.com/begoonahl/status/1644999470021595137> (Doc. 220\_06); @IranIntl, X (Apr. 9, 2023) <https://x.com/IranIntl/status/1645004924734828544?s=20> (Doc. 220\_03); @khizesh, YOUTUBE (Apr. 9, 2023) <https://www.youtube.com/watch?v=gsdJSynSVIA> (Doc. 220\_14).

<sup>254</sup> @HengawO, X (Apr. 9, 2023) <https://twitter.com/HengawO/status/1644998757384159233> (Doc. 220\_01).

<sup>255</sup> Citizen Journalist, *Anger over Saqqez School Poisonings Triggers more Security, Censorship*, IRAN WIRE (Apr. 10, 2023) (Doc. 220\_30).



Source: @FatPixelFat, X (Apr. 8, 2023) <https://x.com/FatpixelFat/status/1644784349382955009?s=20> (Doc. 40\_01).

Sources cite different numbers of students from this and several other incidents in Saqqez who were sent to the hospital, ranging from 50 to 100.<sup>256</sup> There are also disputes about whether any girls had to stay overnight. A local journalist reported that the Saqqez education department and the head of Saqqez’s health services told her that all students were discharged the same day, but other sources told her this wasn’t true, and that some students remained overnight and were still being monitored at the time she spoke with them.<sup>257</sup>

State-affiliated news outlets were silent about this case, as were local and national officials.<sup>258</sup> According to a local journalist, the Secretariat of the Press Supervision Board in Saqqez ordered local news organizations not to report on poisoning incidents because such reporting could cause societal unrest and may rely on local officials who are unauthorized to speak on these incidents.<sup>259</sup> Such an order suggests not only that government officials were attempting to tamp down public information on such incidents, but also that they were seeking to streamline communication through a few authorized officials, possibly to control a centralized narrative about the poisoning incidents. The local journalist also reported that no official authority made a public statement on the matter, although local officials met to discuss it on the evening of April 9.<sup>260</sup> Officials also reportedly prevented citizens from filming the affected girls; a Kurdish man

<sup>256</sup> *Poisoning of more than 100 schoolgirls in Saqqez / Arrest of several concerned parents*, HRANA (Apr. 9, 2023) (Doc. 220\_26) (100); Coordinating Council of Iranian Teachers’ Trade Associations, TELEGRAM (Apr. 9, 2023) <https://t.me/kashowra/16099> (Doc. 220\_29) (over 50, with 7 in “critical condition”); *Poisoning of “more than 100 students” in Saqqez; protesters took down the flag of the Islamic Republic*, VOA (Apr. 9, 2023) (Doc. 220\_16) (100, with 24 in “critical condition”); *Student poisonings; protesters in Saqqez chanted “Death to Khamenei”*, IRAN WIRE (Apr. 9, 2023) (Doc. 220\_18) (100, with 24 in “critical condition”); *The poisoning of students at 6 girls’ schools in Saqqez led to public protests in the city*, KURDISTAN24 (Apr. 10, 2023) (Doc. 220\_27) (85 with 20 in “critical condition”).

<sup>257</sup> Citizen Journalist, *Anger over Saqqez School Poisonings Triggers more Security, Censorship*, IRAN WIRE (Apr. 10, 2023) (Doc. 220\_30).

<sup>258</sup> See Annex C for searches conducted to identify state-affiliated news.

<sup>259</sup> Citizen Journalist, *Anger over Saqqez School Poisonings Triggers more Security, Censorship*, IRAN WIRE (Apr. 10, 2023) (Doc. 220\_30).

<sup>260</sup> *Id.*

whose daughter was affected by the poisonings claimed in a video that he tried to film inside of the hospitals but was prevented from doing so by security officials present at the hospitals.<sup>261</sup>

Despite government officials' silence, other locals were not silent on the issue. Protests captured on video and reported by several non-Iran-based news outlets erupted in Saqqez that afternoon in response to this poisoning incident and several other such incidents reported in Saqqez that day.<sup>262</sup> Videos show protesters in the streets just outside of Ma'raj Girls' High School.<sup>263</sup> Two videos show protesters chanting "Death to Khomeini" and one filmer narrates that the Islamic Republic is responsible for the poisonings, similarly telling the camera that people are chanting "Death to Khomeini, Death to the Islamic Republic."<sup>264</sup> Another video shows protesters removing the Iranian flag from a post near Ma'raj High School.<sup>265</sup> There were also allegations that several protesters were shot at and arrested by government forces.<sup>266</sup>

In addition, the Iranian Coordinating Council of Trade Unions, which includes a teachers' union in Saqqez, described the poisoning attacks in an official statement as "coordinated and systematic" and called government officials "intentionally negligent" for failing to identify the cause of these poisonings and find the perpetrators.<sup>267</sup>

The next day, students and teachers were reported to have stayed home in protest against the attacks, and shopkeepers organized a strike in solidarity.<sup>268</sup> Videos taken on April 11, two days later, appear to confirm this, showing shops in Ardelan Bazaar and on a main shopping street in

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<sup>261</sup> @minomohammadii, X (Apr. 9, 2023) <https://twitter.com/minomohammadii/status/1645011552817274881> (Doc. 220\_05). Note that this video was a selfie with few identifiable features, and our team was unable to geolocate it.

<sup>262</sup> *Chemical attacks on girls' schools; security forces open fire on protesters in Saqqez*, IRAN INT'L (Apr. 9, 2023) (Doc. 220\_02); *Poisoning of "more than 100 students" in Saqqez; protesters took down the flag of the Islamic Republic*, VOA (Apr. 9, 2023) (Doc. 220\_16); *Reports of student poisonings and citizen protests in Saqqez and several other cities*, BBC (Apr. 9, 2023) (Doc. 220\_17); *Student poisonings; protesters in Saqqez chanted "Death to Khamenei"*, IRAN WIRE (Apr. 9, 2023) (Doc. 220\_18).

<sup>263</sup> @Tanha\_5566, X (Apr. 9, 2023) [https://twitter.com/Tanha\\_5566/status/1645031178984910848](https://twitter.com/Tanha_5566/status/1645031178984910848) (Doc. 220\_07); @FarashgardFdn, X (Apr. 9, 2023) <https://twitter.com/FarashgardFdn/status/1645079098190856194/video/2> (Doc. 220\_09); @RamezanAli2, X (Apr. 9, 2023) <https://twitter.com/RamezanAli2/status/1645030464699219968> (Doc. 220\_13).

<sup>264</sup> @RamezanAli2, X (Apr. 9, 2023) <https://twitter.com/RamezanAli2/status/1645030464699219968> (Doc. 220\_13); @FarashgardFdn, X (Apr. 9, 2023) <https://twitter.com/FarashgardFdn/status/1645079098190856194/video/2> (Doc. 220\_09).

<sup>265</sup> @poshtpardeha, TELEGRAM (Apr. 9, 2023) <https://t.me/poshtpardeha/186215> (Doc. 220\_21).

<sup>266</sup> @Hengaw\_Org, TELEGRAM (Apr. 10, 2023) [https://t.me/Hengaw\\_Org/18342](https://t.me/Hengaw_Org/18342) (Doc. 220\_33); *The poisoning of students at 6 girls' schools in Saqqez led to public protests in the city*, KURDISTAN24 (Apr. 10, 2023) (Doc. 220\_27); *Chemical attacks on girls' schools; security forces open fire on protesters in Saqqez*, IRAN INT'L (Apr. 9, 2023) (Doc. 220\_02). A video appears to capture this, with what look like government trucks driving away and a woman screaming, "Let him go! Let him go!" in the video. However, our team was unable to geolocate the video. @FarashgardFdn, X (Apr. 9, 2023) <https://twitter.com/FarashgardFdn/status/1645079098190856194/video/2> (Doc. 220\_10).

<sup>267</sup> @kashowra, TELEGRAM (Apr. 10, 2023) <https://t.me/kashowra/16124> (Doc. 220\_28).

<sup>268</sup> *Chain poisonings; reports of student poisonings in Shahriar, Bandar Ganaveh, Oshnavieh, Shahinshahr, Amol, and Tabriz*, BBC News (Apr. 11, 2023) (Doc. 220\_22); *The poisoning of students at 6 girls' schools in Saqqez led to public protests in the city*, KURDISTAN24 (Apr. 10, 2023) (Doc. 220\_27).



Saqquez closed.<sup>269</sup> The principal of Ma'raj subsequently resigned in “civil protest” over the government’s failure to identify perpetrators, claiming further that school administrators and teachers were being unfairly blamed.<sup>270</sup>

No official follow-up investigation into this case was ever announced, nor any explanation publicized. We also did not find any reported security measures taken to prevent further incidents at Ma'raj.

### April 10, 2023: Sadr Girls’ High School, Karaj, Alborz Province

At some point during the school day on April 10, 2023, according to Rouydad24, a reformist news outlet based in Iran, girls at Sadr Girls’ High School in Karaj suffered from poisoning.<sup>271</sup> Videos from the scene show girls experiencing symptoms in front of the school still wearing their uniforms, suggesting they had just left the school. One girl is leaning over the sidewalk appearing to have just thrown up, a splatter of what looks like vomit on the street in front of her.<sup>272</sup> Another girl sitting on the ground sways back, her eyes looking unfocused in the video, as if she is dizzy, and several people have to help her up to her feet.<sup>273</sup> In another video, a girl can be seen sitting on the ground struggling to get up, and several women are attempting to lift her, as if she is having difficulty moving.<sup>274</sup> She also appears to be struggling to breathe, taking short rapid breaths.<sup>275</sup> Eventually medical personnel run towards her and help her up.<sup>276</sup> In the background of videos taken of the scene, multiple other girls can be heard coughing and breathing heavily.<sup>277</sup>

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<sup>269</sup> @Hengaw\_Org, TELEGRAM (Apr. 10, 2023) [https://t.me/Hengaw\\_Org/18340](https://t.me/Hengaw_Org/18340) (Doc. 220\_31); @Hengaw\_Org, TELEGRAM (Apr. 10, 2023) [https://t.me/Hengaw\\_Org/18341](https://t.me/Hengaw_Org/18341) (Doc. 220\_32).

<sup>270</sup> @Hengaw\_Org, TELEGRAM (Apr. 15, 2023) [https://t.me/Hengaw\\_Org/18392](https://t.me/Hengaw_Org/18392) (Doc. 220\_35); see also *Organized chemical attacks on schools continued with at least 7 cases in a single day*, HENGAW (Apr. 13, 2023) (Doc. 220\_25); *A new wave of serial poisonings in girls' schools in several cities*, DW (Apr. 13, 2023) (Doc. 220\_23).

<sup>271</sup> *Poisoning of students at Sadr Girls’ School in Karaj + video*, ROUYDAD24 (Apr. 10, 2023) (Doc. 08\_03); see also *Poisoning of female students, this time at Sadr School in Karaj – Monday*, VOA (Apr. 10, 2023) (Doc. 08\_05).

<sup>272</sup> @centerforhumanrights, INSTAGRAM (Apr. 10, 2023) <https://www.instagram.com/p/Cq3mF16PMtb/> (Doc. 08\_01).

<sup>273</sup> *Id.*

<sup>274</sup> @ManotoNews, X (Apr. 10, 2023) <https://x.com/ManotoNews/status/1645381108358590464> (Doc. 08\_06).

<sup>275</sup> *Id.*

<sup>276</sup> *Id.*

<sup>277</sup> @Gozareshgar, YOUTUBE (Apr. 10, 2023) <https://www.youtube.com/watch?v=ZBSSSG1bFEk> (Doc. 08\_07) (partially geolocated); @ManotoNews, X (Apr. 10, 2023) <https://x.com/ManotoNews/status/1645381108358590464> (Doc. 08\_06).





Source: @centerforhumanrights, INSTAGRAM (Apr. 10, 2023)  
<https://www.instagram.com/p/Cq3mF16PMtb/> (Doc. 08\_01).

Medical personnel and ambulances can be seen in several videos; they show ambulances parked in the street in front of the school and in the courtyard, and medical personnel running into the school or helping walk girls out.<sup>278</sup> A girl can be seen lying on a stretcher in an ambulance, and girls are filmed huddling around an ambulance window peering inside, looking like they are talking to someone inside.<sup>279</sup> Together, these videos suggest that girls were taken to the hospital or another health care center for further care.

State-affiliated news media were mostly silent on this case, a surprising fact given their reporting on previous poisoning incidents at schools in Karaj a month before.<sup>280</sup> The only state-affiliated news source we identified that reported on this incident was Mehr News, which “strongly denied” any reports of poisoning at Sadr Girls’ High School in Karaj.<sup>281</sup> Mehr News explained that the event was instead caused by a burning transformer which created a burning smell and caused panic among students, and while medical personnel were dispatched, no one suffered medical complications or went to the hospital for further care.<sup>282</sup>

Yet this reporting is contradicted by what appears in multiple videos filmed at the scene. Far from simply smelling burning and panicking, girls can be seen or heard vomiting, coughing, struggling to breathe, and having difficulty standing – possibly from leg paralysis – in videos. In addition, at least one girl can be seen lying on a stretcher inside of an ambulance, indicating she

<sup>278</sup> @IranIntl, X (Apr. 10, 2023) <https://x.com/IranIntl/status/1645363053700022273> (Doc. 08\_09); @ManotoNews, X (Apr. 10, 2023) <https://x.com/ManotoNews/status/1645381108358590464> (Doc. 08\_06); @Efshagar\_Rasu, X (Apr. 10, 2023) [https://x.com/Efshagar\\_Rasu/status/1645373291006156800](https://x.com/Efshagar_Rasu/status/1645373291006156800) (Doc. 08\_08).

<sup>279</sup> @IranIntl, X (Apr. 10, 2023) <https://x.com/IranIntl/status/1645363053700022273> (Doc. 08\_09); @ManotoNews, X (Apr. 10, 2023) <https://x.com/ManotoNews/status/1645381108358590464> (Doc. 08\_06).

<sup>280</sup> See *All poisoned students in Karaj have been discharged from the hospital*, ISNA (Mar. 3, 2023) (Doc. 08\_11); *Poisoning of students at a girls' high school in Fardis / Security Council held a meeting*, TASNIM (Mar. 1, 2023) (Doc. 08\_13); *Several students in Karaj were taken to the hospital with symptoms of poisoning*, IRNA (Mar. 2, 2023) (Doc. 08\_14); see also Annex C (detailing searches for state-affiliated news).

<sup>281</sup> *Denial of the rumor about student poisoning at Sadr School in Karaj*, MEHR (Apr. 11, 2023) (Doc. 08\_04).

<sup>282</sup> *Id.*

was heading to a hospital or other health care facility.<sup>283</sup> These videos cast serious doubt on state-affiliated media's description of the incident and instead tell a different story: that girls were poisoned at Sadr High School from inhaling an unknown substance, similar to the experiences of girls detailed in other poisoning incidents in this report.

We did not find any further information about this case, including any investigations announced, nor did we find an explanation provided by authorities. We also did not find any announcements from officials about additional security measures taken to prevent future incidents from happening, a surprising omission given that similar incidents had been reported in Karaj several weeks prior.<sup>284</sup>

### April 11, 2023: Four Incidents in Isfahan Province

Although there is limited local reporting on these incidents because they occurred on the day the government allegedly issued a moratorium on reporting about alleged poisoning incidents,<sup>285</sup> there were at least a dozen reported poisoning incidents in several cities across Isfahan Province on April 11, 2023. Between 11-12 schools were reported to have experienced poisoning incidents in Shahinshahr, Isfahan Province, and at least one school in Isfahan City, Isfahan Province.<sup>286</sup> According to MP for Shahinshahr, Hossein Ali Haji Deligani, 170 students in Shahinshahr were sent to the hospital with “respiratory problems” and all but 10 were later discharged, with seven staying overnight.<sup>287</sup> Shahinshahr’s mayor Mohammad Reza Kazemi Taba downsized the numbers several days later, claiming that only 16 students went to the hospital for poisoning and the rest went to the hospital due to stress.<sup>288</sup> It is unclear how many were sent to the hospital from the incidents in Isfahan City.

All four cases below include allegations that school administrators kept students inside the schools when poisonings occurred. ISNA speculated that the Ministry of Education did not appear to have sent “the correct [...] instructions to administrators to deal with these incidents.”<sup>289</sup> ISNA further reported that according to an interviewed hospital staff member, “some administrators, based on personal preference or a specific directive that we are not aware

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<sup>283</sup> @IranIntl, X (Apr. 10, 2023) <https://x.com/IranIntl/status/1645363053700022273> (Doc. 08\_09). Very likely a second girl was taken away in an ambulance as well, as indicated by several girls gathered by the ambulance window appearing to be talking to someone inside. @ManotoNews, X (Apr. 10, 2023) <https://x.com/ManotoNews/status/1645381108358590464> (Doc. 08\_06).

<sup>284</sup> See *supra* note 280.

<sup>285</sup> See *infra* Part II.A.

<sup>286</sup> *What was the cause of the student poisoning in Shahinshahr?* ISNA (Apr. 15, 2023) (Doc. 143\_27); *The escalating trend of organized attacks on schools; at least 27 schools were targeted by chemical attacks in a single working day*, HENGAW (Apr. 11, 2023) (Doc. 143\_11); *Accounts of suspicious poisonings from schools in Shahinshahr to dormitories in Tehran*, IRAN WIRE (Apr. 12, 2023) (Doc. 147\_08); *Poisoning of students across Iran; on Tuesday, at least 28 schools were targeted with chemical attacks*, IRAN INT’L (Apr. 11, 2023) (Doc. 143\_08).

<sup>287</sup> *What was the cause of the student poisoning in Shahinshahr?* ISNA (Apr. 15, 2023) (Doc. 143\_27); *Leak of 'mercaptan' was the cause of the unpleasant odor in Shahinshahr*, TASNIM (Apr. 13, 2023) (Doc. 143\_30).

<sup>288</sup> *What was the story behind the poisoning of students in Shahinshahr?* SHAHINSHAHRI INDEPENDENT NEWS AGENCY (Apr. 11, 2023) (Doc. 143\_17); *What was the cause of the student poisoning in Shahinshahr?* ISNA (Apr. 15, 2023) (Doc. 143\_27).

<sup>289</sup> *What was the cause of the student poisoning in Shahinshahr?* ISNA (Apr. 15, 2023) (Doc. 143\_27).

of, insist on keeping students inside of the school to manage the crisis.”<sup>290</sup> The staff member explained that school administrators had done this despite the fact that some students have diseases that could make toxic gas inhalation irreparably harmful to them.<sup>291</sup>

Three of the reported cases in Shahinshahr on April 11, 2023 are detailed below, followed by one of the reported cases in Isfahan City on the same day.

### *Shahinshahr Cases:*

#### Al Yaseen Girls’ Vocational School

On April 11, 2023, Shahinshahri Independent News Agency, a local domestic news outlet, reported that girls at Al-Yaseen Girls’ Vocational School smelled “a specific odor” and “felt unwell” due to a “substance in the air.”<sup>292</sup> While we were not able to find a complete number of girls sent to the hospital from this incident, we know at least 16 girls from this school were sent to the hospital for “poisoning,” and 7 were kept at least overnight,<sup>293</sup> out of at least 170 schoolgirls across Shahinshahr who were hospitalized that day.<sup>294</sup> Other media coverage from Iran International and the Kurdish NGO Hengaw also reported a poisoning incident at al-Yaseen Girls’ High School in Shahinshahr, although neither included their evidence for this incident.<sup>295</sup>

Videos show girls in their school uniforms coughing and struggling to breathe in front of the school.<sup>296</sup> One girl, while being helped towards an ambulance by two other girls, appears to lose ability to use her legs; her legs give out as she moves towards the ambulance.<sup>297</sup> Another is holding her throat as she leans over uncontrollably coughing.<sup>298</sup> Another, surrounded by other girls, is lying on the ground, only her feet visible, as an adult screams for medical personnel to help her.<sup>299</sup> Several videos and photos show ambulances at the scene,<sup>300</sup> although one filmer says while filming the incident that the ambulances was slow to arrive.<sup>301</sup>

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<sup>290</sup> *Id.*

<sup>291</sup> *Id.*

<sup>292</sup> [\*What was the story behind the poisoning of students in Shahinshahr?\*](#) SHAHINSHAHRI INDEPENDENT NEWS AGENCY (Apr. 11, 2023) (Doc. 143\_17).

<sup>293</sup> [\*What was the story behind the poisoning of students in Shahinshahr?\*](#) SHAHINSHAHRI INDEPENDENT NEWS AGENCY (Apr. 11, 2023) (Doc. 143\_17).

<sup>294</sup> [\*Accounts of suspicious poisonings from schools in Shahinshahr to dormitories in Tehran.\*](#) IRAN WIRE (Apr. 12, 2023) (Doc. 147\_08).

<sup>295</sup> [\*The escalating trend of organized attacks on schools; at least 27 schools were targeted by chemical attacks in a single working day.\*](#) HENGAW (Apr. 11, 2023) (Doc. 143\_11); [\*Poisoning of students across Iran; on Tuesday, at least 28 schools were targeted with chemical attacks.\*](#) IRAN INT’L (Apr. 11, 2023) (Doc. 143\_08). Hengaw reported at least 27 incidents at different schools on April 11, 2023; Iran International reported 28.

<sup>296</sup> @IranDidban, YOUTUBE (Apr. 11, 2023) <https://www.youtube.com/watch?v=sl9bDerHnm8> (Doc. 143\_03); @KanalJadidTV, YOUTUBE (Apr. 11, 2023) <https://www.youtube.com/watch?v=FPdJ9WzhryM> (Doc. 143\_01).

<sup>297</sup> @IranDidban, YOUTUBE (Apr. 11, 2023) <https://www.youtube.com/watch?v=sl9bDerHnm8> (Doc. 143\_03).

<sup>298</sup> *Id.*

<sup>299</sup> @iran\_azadeh1402 INSTAGRAM (Apr. 11, 2023) [https://www.instagram.com/reel/Cq7\\_nh\\_O9gc/?utm\\_source=ig\\_web\\_copy\\_link](https://www.instagram.com/reel/Cq7_nh_O9gc/?utm_source=ig_web_copy_link) (Doc. 143\_16).

<sup>300</sup> @KanalJadidTV, YOUTUBE (Apr. 11, 2023) <https://www.youtube.com/watch?v=FPdJ9WzhryM> (Doc. 143\_01); @Hasan23891, INSTAGRAM (Apr. 11, 2023) [https://www.instagram.com/p/Cq5eZGctxhw/?utm\\_source=ig\\_web\\_copy\\_link](https://www.instagram.com/p/Cq5eZGctxhw/?utm_source=ig_web_copy_link) (Doc. 143\_14); @iran\_azadeh1402 INSTAGRAM (Apr. 11, 2023) [https://www.instagram.com/reel/Cq7\\_nh\\_O9gc/?utm\\_source=ig\\_web\\_copy\\_link](https://www.instagram.com/reel/Cq7_nh_O9gc/?utm_source=ig_web_copy_link) (Doc. 143\_16).

<sup>301</sup> @IranDidban, YOUTUBE (Apr. 11, 2023) <https://www.youtube.com/watch?v=sl9bDerHnm8> (Doc. 143\_03).



Source: @IranDidban, YOUTUBE (Apr. 11, 2023) <https://www.youtube.com/watch?v=sI9bDerHnm8> (Doc. 143\_03).

In addition, girls were reportedly prevented by school administrators from leaving the school.<sup>302</sup> Several videos claimed to have been filmed at Al-Yaseen appear to support these allegations, showing girls inside of a school kicking open a door with parents waiting outside.<sup>303</sup> When the girls emerge, chaos erupts, and someone starts yelling “you have no right to close this door” at a man in the background, possibly a school administrator.<sup>304</sup> Unfortunately, we were not able to geolocate these videos, so we cannot be certain that they were filmed at Al-Yaseen Girls’ High School.

#### Talo’ Girls’ High School

According to local media, students at Talo’ Girls’ High School similarly “felt unwell” due to “something in the air.”<sup>305</sup> Non-Iran-based news outlets, including the BBC, Voice of America (VOA), and Iran Wire, confirmed this.<sup>306</sup> A student who experienced the event told the Center for Human Rights in Iran that during math class, she began smelling something like a plastic balloon.<sup>307</sup> The school rang the bell early, she explained, and everyone was sent into the courtyard. The students were instructed to wet their masks and put them on, but they had not previously been wearing masks.

<sup>302</sup> *Poisoning of students across Iran; on Tuesday, at least 28 schools were targeted with chemical attacks*, IRAN INT’L (Apr. 11, 2023) (Doc. 143\_08); *The escalating trend of organized attacks on schools; at least 27 schools were targeted by chemical attacks in a single working day*, HENGAW (Apr. 11, 2023) (Doc. 143\_11).

<sup>303</sup> @KanalJadidTV, YOUTUBE (Apr. 11, 2023) <https://www.youtube.com/watch?v=FPdJ9WzhryM> (Doc. 143\_01); @1500tasvir, TELEGRAM (Apr. 11, 2023) <https://t.me/t1500tasvir/6926> (Doc. 143\_02) (unable to geolocate).

<sup>304</sup> @1500tasvir, TELEGRAM (Apr. 11, 2023) <https://t.me/t1500tasvir/6926> (Doc. 143\_02) (unable to geolocate).

<sup>305</sup> *What was the story behind the poisoning of students in Shahinshahr?* SHAHINSHAHRI INDEPENDENT NEWS AGENCY (Apr. 11, 2023) (Doc. 143\_17).

<sup>306</sup> *Poisoning incidents at girls' schools in Isfahan, Tabriz, Mashhad, and Kermanshah*, VOA (Apr. 11, 2023) (Doc. 147\_07); *Accounts of suspicious poisonings from schools in Shahinshahr to dormitories in Tehran*, IRAN WIRE (Apr. 12, 2023) (Doc. 147\_08); BBC News X (Apr. 11, 2023) <https://x.com/bbcpersian/status/1645769976190496769> (Doc. 147\_09).

<sup>307</sup> *The continued chemical attacks on girls' schools and the inaction of government officials in ensuring student safety*, CENTER FOR HUMAN RIGHTS IN IRAN (Apr. 25, 2023) (Doc. 147\_01).



Girls can be seen in video evidence standing in groups outside of the school, several of whom are sitting on the curb bending over and coughing, covering their mouths.<sup>308</sup> The student interviewed by the Center for Human Rights in Iran similarly reported difficulty breathing, and added that she felt her eyes burn.<sup>309</sup> She also said that she was unable to stand and fell to the ground.<sup>310</sup> She watched other students experience nausea, difficulty breathing, and burning eyes.<sup>311</sup>



Source: @1500tasvir, X (Apr. 11, 2023) <https://twitter.com/1500tasvir/status/1645730729022693378> (Doc. 147\_02).

Like at al-Yaseen, girls at Talo' said that they were prevented from leaving by school authorities.<sup>312</sup> The student interviewed by the Center for Human Rights in Iran told the nonprofit that administrators did not initially allow her friend to go back into the school to retrieve her cell phone and call for help, and that they were prevented from leaving the school courtyard.<sup>313</sup> In a video, narrated by a student or parent, the filmer stated that the door of the school was locked and the students were not allowed to leave.<sup>314</sup> Even when students were finally released, the filmer reported that the teachers were also not being allowed out.<sup>315</sup>

#### Ansari Girls' High School

The Shahin Shahr Independent News Agency also confirmed that a similar incident occurred at Ansari Girls' High School in Shahinshahr,<sup>316</sup> as did several international media outlets.<sup>317</sup> A video filmed outside of Ansari Girls' High School shows girls leaning over coughing and

<sup>308</sup> @1500tasvir, X (Apr. 11, 2023) <https://twitter.com/1500tasvir/status/1645730729022693378> (Doc. 147\_02).

<sup>309</sup> *The continued chemical attacks on girls' schools and the inaction of government officials in ensuring student safety*, CENTER FOR HUMAN RIGHTS IN IRAN (Apr. 25, 2023) (Doc. 147\_01).

<sup>310</sup> *Id.*

<sup>311</sup> *Id.*

<sup>312</sup> *Id.*; @1500tasvir, X (Apr. 11, 2023) <https://twitter.com/1500tasvir/status/1645730729022693378> (Doc. 147\_02); see also BBC News X (Apr. 11, 2023) <https://x.com/bbcpersian/status/1645769976190496769> (Doc. 147\_09).

<sup>313</sup> *The continued chemical attacks on girls' schools and the inaction of government officials in ensuring student safety*, CENTER FOR HUMAN RIGHTS IN IRAN (Apr. 25, 2023) (Doc. 147\_01).

<sup>314</sup> @1500tasvir, X (Apr. 11, 2023) <https://twitter.com/1500tasvir/status/1645730729022693378> (Doc. 147\_02); see also BBC News X (Apr. 11, 2023) <https://x.com/bbcpersian/status/1645769976190496769> (Doc. 147\_09).

<sup>315</sup> @1500tasvir, X (Apr. 11, 2023) <https://twitter.com/1500tasvir/status/1645730729022693378> (Doc. 147\_02).

<sup>316</sup> *What was the story behind the poisoning of students in Shahinshahr?* SHAHINSHAHRI INDEPENDENT NEWS AGENCY (Apr. 11, 2023) (Doc. 143\_17).

<sup>317</sup> *Ongoing serial poisonings; suspect missing, leads unclear*, DW (Apr. 11, 2023) (Doc. 145\_15); *Poisoning incidents at girls' schools in Isfahan, Tabriz, Mashhad, and Kermanshah*, VOA (Apr. 11, 2023) (Doc. 144\_02); *Suspicious poisonings continue; Hengaw: Several principals in Baneh have asked students to stay home*, RADIO FARDA (Apr. 11, 2023) (Doc. 144\_03); *Accounts of suspicious poisonings from schools in Shahinshahr to dormitories in Tehran*, IRAN WIRE (Apr. 12, 2023) (Doc. 147\_08).



struggling to breathe.<sup>318</sup> In the background, a girl can be heard saying that she “feels sick.”<sup>319</sup> In another, a girl being held up by two adults is struggling to walk, her head slanted at an unnatural angle.<sup>320</sup>



Source: @KanalJadidTV, YOUTUBE (Apr. 11, 2023) <https://www.youtube.com/watch?v=rLChAQWIA4> (Doc. 144\_01).

Similarly to allegations at al-Yaseen and Talo’, there were reports in international news outlets that students at Ansari were prevented from leaving the school; such reports were repeated by state-affiliated media.<sup>321</sup>

### *Isfahan City Case:*

#### *Shayan Girls’ High School*

On April 11, 2023, girls at Shayan Girls’ High School in Isfahan City were also reported to have experienced a poisoning incident. Although no local media reported on this case (possibly due to the moratorium imposed on reporting), several news sources based outside of Iran reported that this event occurred.<sup>322</sup> Six videos and one photo taken at Shayan Girls’ High School on April 11, 2023 confirm the incident.<sup>323</sup> These videos and photo show two ambulances parked outside of

<sup>318</sup> @KanalJadidTV, YOUTUBE (Apr. 11, 2023) <https://www.youtube.com/watch?v=rLChAQWIA4> (Doc. 144\_01); @IranIntl, X (Apr. 11, 2023) <https://x.com/IranIntl/status/1645705825380433921> (Doc. 144\_06); @IranNewsAgency0, X (Apr. 11, 2023) <https://x.com/IranNewsAgency0/status/1645735703693721601> (Doc. 144\_07).

<sup>319</sup> @KanalJadidTV, YOUTUBE (Apr. 11, 2023) <https://www.youtube.com/watch?v=rLChAQWIA4> (Doc. 144\_01); @IranIntl, X (Apr. 11, 2023) <https://x.com/IranIntl/status/1645705825380433921> (Doc. 144\_06).

<sup>320</sup> @KanalJadidTV, YOUTUBE (Apr. 11, 2023) <https://www.youtube.com/watch?v=rLChAQWIA4> (Doc. 144\_01).

<sup>321</sup> *Poisoning incidents at girls' schools in Isfahan, Tabriz, Mashhad, and Kermanshah*, VOA (Apr. 11, 2023) (Doc. 144\_02); *Suspicious poisonings continue; Hengaw: Several principals in Baneh have asked students to stay home*, RADIO FARDA (Apr. 11, 2023) (Doc. 144\_03); *What was the cause of the student poisoning in Shahinshahr?* ISNA (Apr. 15, 2023) (Doc. 143\_27) (reporting that girls were prevented from leaving their schools in Shahinshahr).

<sup>322</sup> *Chemical attack on Shayan Girls' School in Isfahan – on Tuesday*, VOA (Apr. 11, 2023) (Doc. 145\_04); *Suspicious poisonings continue; Hengaw: Several principals in Baneh have asked students to stay home*, RADIO FARDA (Apr. 11, 2023) (Doc. 145\_05); *The escalating trend of organized attacks on schools; at least 27 schools were targeted by chemical attacks in a single working day*, HENGAW (Apr. 11, 2023) (Doc. 143\_11); *Ongoing serial poisonings; suspect missing, leads unclear*, DW (Apr. 11, 2023) (Doc. 145\_15).

<sup>323</sup> @1500tasvir, TELEGRAM (Apr. 11, 2023) <https://t.me/t1500tasvir/6932> (Doc. 145\_02); @1500tasvir, TELEGRAM (Apr. 11, 2023) <https://t.me/Sokhaniaznikan/145098> (Doc. 145\_07); @Melim43029819, X (Apr. 11, 2023) <https://x.com/Melim43029819/status/1645720348355076097?s=20> (Doc. 145\_10); @IranIntl, X (Apr. 11, 2023) <https://x.com/IranIntl/status/1645949706604871680?s=20> (Doc. 145\_12); @IranIntl, X (Apr. 11, 2023) <https://x.com/IranIntl/status/1645721743133224960?s=20> (Doc. 145\_13); @isfahan.world, INSTAGRAM (Apr. 11, 2023) <https://www.instagram.com/isfahan.world/reel/Cq6FuoxMDIO/> (Doc. 145\_14).

the school, schoolgirls gathered outside of the school gate, and adults (presumably parents) present with schoolgirls, along with police officers present as girls file into ambulances and leave the school.<sup>324</sup> In one video, a mother can be heard yelling that her child's "lungs are hurting."<sup>325</sup> In another video, a woman can be heard screaming, exclaiming "how many times did I say to close the doors to this school? You said there are doctors on this side, engineers on this side, so what happened?!"<sup>326</sup> In still another video, a girl can be seen getting into an ambulance.<sup>327</sup>



Source: @ Melim43029819, X (Apr. 11, 2023) <https://x.com/Melim43029819/status/1645720348355076097?s=20> (Doc. 145\_10).

Like the other three cases from April 11, 2023, in Shahinshahr, there were allegations that the girls were not let out of the school after they began experiencing symptoms of poisoning. In one of the videos, someone else can be heard interrupting the same woman mentioned above, saying "they are not even letting them out now," presumably speaking about the girls.<sup>328</sup> The woman yelling then demands to know where "Miss Parvar" is (presumably a teacher or administrator), and someone responds saying she is hiding inside of the school.<sup>329</sup>

There is no clear explanation for what occurred on April 11 at Shayan Girls' High School in Isfahan City, despite the fact that CCTV cameras were reportedly in school classrooms, which should have made it possible for officials to gather evidence about what was going on.<sup>330</sup> While state officials blamed the incidents in Shahinshahr on a natural gas leak, they did not specify whether this alleged leak also caused the incidents in Isfahan City. State-affiliated media reported that based on "numerous interviews with the agencies responsible for these incidents," Isfahan officials came to the understanding that the poisoning of students at Shayan School occurred because an excavator was operating next to the school, producing black smoke which

<sup>324</sup> @ Melim43029819, X (Apr. 11, 2023) <https://x.com/Melim43029819/status/1645720348355076097?s=20> (Doc. 145\_10).

<sup>325</sup> @isfahan.world, INSTAGRAM (Apr. 11, 2023) <https://www.instagram.com/isfahan.world/reel/Cq6FuoxMDIO/> (Doc. 145\_14).

<sup>326</sup> @1500tasvir, TELEGRAM (Apr. 11, 2023) <https://t.me/t1500tasvir/6932> (Doc. 145\_03); @ Melim43029819, X (Apr. 11, 2023) <https://x.com/Melim43029819/status/1645720348355076097?s=20> (Doc. 145\_10).

<sup>327</sup> @IranIntl, X (Apr. 11, 2023) <https://x.com/IranIntl/status/1645949706604871680?s=20> (Doc. 145\_12).

<sup>328</sup> @1500tasvir, TELEGRAM (Apr. 11, 2023) <https://t.me/t1500tasvir/6932> (Doc. 145\_03).

<sup>329</sup> @1500tasvir, TELEGRAM (Apr. 11, 2023) <https://t.me/t1500tasvir/6932> (Doc. 145\_03).

<sup>330</sup> @NR2OH, X (Apr. 11, 2023) <https://x.com/NR2OH/status/1645711853639663616?s=20> (Doc. 145\_01) (showing screenshots of classroom photos from Shayan High School's Instagram account where CCTV cameras can be seen).

entered the school.<sup>331</sup> Yet no black smoke can be seen in any of the videos we found capturing this incident, however, nor did we find any eyewitness reports of such black smoke. This explanation reportedly offered by Isfahan officials is highly unlikely. We also did not find any announcements or information about any protection measures to prevent future incidents from happening at Shayan Girls' High School.

### *Officials' Responses and Explanations to the Four Isfahan Province Cases*

Local officials appeared to have been scrambling to figure out what was going on. Local media claimed that soil and air samples were taken from the city and sent to a nearby medical sciences school for testing.<sup>332</sup> The Shahinshahri Independent News Agency also said that following several reported incidents in Shahinshahr, a "crisis management" team met to discuss responses; the team included several local government officials and a university professor who were not named.<sup>333</sup> ISNA reported that Ali Deligani Hossein, MP for Shahinshahr, stated in an interview that "the size ... of these crimes in Shahinshahr ... requires special follow-up by the authorities," and called on security, administrative, and military institutions to take "action in coordination with judicial authorities and to use all means, including electronic means, to arrest the perpetrators of this crime."<sup>334</sup> He promised to stand by families until perpetrators were identified and arrested, and that families were being assured that "measures were being devised" for school protection, although he did not specify what those measures were.<sup>335</sup> ISNA reported that security officials – including an IRGC commander, police commander, Basij commander, and members of the local area's security team – all were present in the area and in the emergency room interviewing students about what happened.<sup>336</sup> Meanwhile, Isfahan officials who remained unnamed, according to ISNA, attributed all incidents to "childish pranks" and "mass hysteria," and local agencies refused to publish news about the reported incidents, even several days later.<sup>337</sup>

Four days later, after appearing to align on a single narrative, officials announced that all incidents in Shahinshahr on April 11 were caused by a natural gas leak in the city.<sup>338</sup> Shahinshahr Mayor Mohammad Reza Kazemi Taba confirmed this explanation, detailing that

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<sup>331</sup> *What was the cause of the student poisoning in Shahinshahr?* ISNA (Apr. 15, 2023) (Doc. 143\_27). Note that ISNA reports it as Shayan School in Shahinshahr, not Isfahan City. It is unclear whether ISNA meant this Shayan school or a different Shayan school in Shahinshahr.

<sup>332</sup> *What was the story behind the poisoning of students in Shahinshahr?* SHAHINSHAHRI INDEPENDENT NEWS AGENCY (Apr. 11, 2023) (Doc. 143\_17).

<sup>333</sup> *What was the story behind the poisoning of students in Shahinshahr?* SHAHINSHAHRI INDEPENDENT NEWS AGENCY (Apr. 11, 2023) (Doc. 143\_17).

<sup>334</sup> *What was the cause of the student poisoning in Shahinshahr?* ISNA (Apr. 15, 2023) (Doc. 143\_27); *see also Accounts of suspicious poisonings from schools in Shahinshahr to dormitories in Tehran*, IRAN WIRE (Apr. 12, 2023) (Doc. 147\_08).

<sup>335</sup> *What was the cause of the student poisoning in Shahinshahr?* ISNA (Apr. 15, 2023) (Doc. 143\_27).

<sup>336</sup> *What was the cause of the student poisoning in Shahinshahr?* ISNA (Apr. 15, 2023) (Doc. 143\_27).

<sup>337</sup> *What was the cause of the student poisoning in Shahinshahr?* ISNA (Apr. 15, 2023) (Doc. 143\_27) (highlighting the silence of the Isfahan Provincial Education and Medical Sciences Department).

<sup>338</sup> *What was the story behind the poisoning of students in Shahinshahr?* SHAHINSHAHRI INDEPENDENT NEWS AGENCY (Apr. 11, 2023) (Doc. 143\_17); *Arrest of 2 gas company personnel in connection with the release of pollutant gases in Shahinshahr*, TASNIM (Apr. 15, 2023) (Doc. 143\_28); *Arrest of 2 gas company employees due to negligence and the release of pollutant gases in Shahinshahr*, IRNA (Apr. 14, 2023) (Doc. 143\_29).

after “problems in educational centers,”<sup>339</sup> the gas was smelled in other parts of Shahinshahr, including in parks and some offices,<sup>340</sup> and samples taken from the soil and air showed a natural gas leak in the area.<sup>341</sup> IRNA and Tasnim explained that the leak was of the chemical mercaptan, an odorous chemical used to alert people of natural gas leaks, which leaked out after two workers were moving natural gas and didn’t notice a valve open, and this caused the “poisoning” of 16 students.<sup>342</sup> Kazemi Taba went even further, saying that the girls were not even poisoned, but that they just felt effects because of the psychological atmosphere in schools which “exacerbated” the effects of the gas.<sup>343</sup> Two people from the local natural gas company were announced to have been arrested for negligence.<sup>344</sup> Kazemi Taba told state-affiliated news that they did not need to close schools given the cause of the incidents.<sup>345</sup>

Yet casting doubt on this explanation is the response of gas company itself, which was reported to have initially denied any gas leak had occurred. According to local reporting in Shahinshahr, a fake apology (it was not specified when or by whom) was issued on behalf of the local gas company, apologizing and claiming responsibility for the incidents.<sup>346</sup> The gas company then responded to this purported apology saying that this was fake, there had been no gas issues on April 11 and the company would always notify Shahinshahr officials first if there were leaks.<sup>347</sup> Despite this initial denial by the gas company, when officials several days later formally announced that a gas leak caused the poisoning incidents, the gas company was reported to have come forward and accept responsibility.<sup>348</sup> Casting further doubt on the official explanation, there were no reports of an odor outside, as state-affiliated news itself pointed out, making the assertion that mercaptan was to blame suspect.<sup>349</sup>

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<sup>339</sup> ); [Leak of 'mercaptan' was the cause of the unpleasant odor in Shahinshahr](#), TASNIM (Apr. 13, 2023) (Doc. 143\_30).

<sup>340</sup> [Remarks by the Shahinshahr County Governor regarding the gathering of students' parents](#), ISNA (Apr. 16, 2023) (Doc. 143\_31).

<sup>341</sup> [Leak of 'mercaptan' was the cause of the unpleasant odor in Shahinshahr](#), TASNIM (Apr. 13, 2023) (Doc. 143\_30).

<sup>342</sup> [Arrest of 2 gas company employees due to negligence and the release of pollutant gases in Shahinshahr](#), IRNA (Apr. 14, 2023) (Doc. 143\_29); [Leak of 'mercaptan' was the cause of the unpleasant odor in Shahinshahr](#), TASNIM (Apr. 13, 2023) (Doc. 143\_30).

<sup>343</sup> [Remarks by the Shahinshahr County Governor regarding the gathering of students' parents](#), ISNA (Apr. 16, 2023) (Doc. 143\_31).

<sup>344</sup> [What was the story behind the poisoning of students in Shahinshahr?](#) SHAHINSHAHRI INDEPENDENT NEWS AGENCY (Apr. 11, 2023) (Doc. 143\_17); [What was the cause of the student poisoning in Shahinshahr?](#) ISNA (Apr. 15, 2023) (Doc. 143\_27); [Arrest of 2 gas company personnel in connection with the release of pollutant gases in Shahinshahr](#), TASNIM (Apr. 15, 2023) (Doc. 143\_28); [Arrest of 2 gas company employees due to negligence and the release of pollutant gases in Shahinshahr](#), IRNA (Apr. 14, 2023) (Doc. 143\_29).

<sup>345</sup> [Remarks by the Shahinshahr County Governor regarding the gathering of students' parents](#), ISNA (Apr. 16, 2023) (Doc. 143\_31).

<sup>346</sup> [What was the story behind the poisoning of students in Shahinshahr?](#) SHAHINSHAHRI INDEPENDENT NEWS AGENCY (Apr. 11, 2023) (Doc. 143\_17).

<sup>347</sup> *Id.*

<sup>348</sup> *Id.*

<sup>349</sup> [What was the cause of the student poisoning in Shahinshahr?](#) ISNA (Apr. 15, 2023) (Doc. 143\_27). It also seems misaligned with the mayor’s initial response to the incident, in which he called the incident a “crime” and said he had requested all security footage of the schools to identify the perpetrators, promising justice for the families. [What was the story behind the poisoning of students in Shahinshahr?](#) SHAHINSHAHRI INDEPENDENT NEWS AGENCY (Apr. 11, 2023) (Doc. 143\_17); *see also id.* (ISNA reporting on the mayor’s seemingly sudden change of tune, moving



The same day that officials announced two people from the local natural gas company had been arrested for negligence, protests erupted in Shahinshahr, largely made up of parents.<sup>350</sup> Protesters can be heard in videos calling for the death of the “agent” responsible for the “poisonings,”<sup>351</sup> seemingly contradicting the state’s official explanation. The situation appears to have escalated as the day went on; in one video, a protester explains to the camera that security guards came and gassed protesters, and threw things at them while they protested.<sup>352</sup> Another video appears to capture this, with protesters yelling and screaming as smoke that looks like tear gas billows towards them and something that sounds like a shot is fired.<sup>353</sup> Kazemi Taba told state-affiliated news that, contrary to what these videos depict, police arrived at the protests and “respectfully” dispersed the group.<sup>354</sup>

## C. Possible Toxic Agents Used

There is limited information in our case files that could enable us to identify what possible toxic agents may have been used in these poisoning cases. We did not find reliable, detailed reports about how long affected schoolchildren were exposed, what odors (if any) each affected girl smelled, what symptoms each affected girl experienced, and for how long they experienced these symptoms. This relatively narrow amount and type of available data significantly limits our ability to narrow down possible toxic agents that were used in these cases. Critically, Iranian officials did not publish any toxicology reports that could have further indicated the presence of particular toxic agents. Keeping these caveats in mind, we did identify some trends from the reported odors in our cases, as well as trends in symptoms ascertained from video evidence depicting our cases along with third party and state-affiliated media reporting about them. Though these trends are relatively generic, they may indicate possible toxic agents and cast doubt on others. Below, we outline such trends from our case files and then describe how such trends may align with four possible toxic agents: hydrogen sulfide; ammonia or chloramine gas; tear gas or pepper spray; or a nerve agent. We argue that tear gas or pepper spray alone are unlikely to be responsible for the girls’ symptoms in these cases, nor were nerve agents likely used. Instead, we point to hydrogen sulfide, chloramine, or ammonia as possible toxic agents used.

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from seeing these incidents as crimes perpetrated by “enemies of Iran” to a simple act of negligence that did not cause anything other than psychological effects among the girls).

<sup>350</sup> *People of Shahinshahr gathered to protest the chemical attacks on schools; crackdown forces attacked the protesters*, IRAN INT’L (Apr. 15, 2023) (Doc. 147\_03); @IranIntl, X (Apr. 15, 2023) <https://x.com/IranIntl/status/1647176111489466368?s=20> ( (Doc. 147\_04); @IranIntl, X (Apr. 15, 2023) <https://x.com/IranIntl/status/1647159072242950147?s=20> (Doc. 147\_05); *Remarks by the Shahinshahr County Governor regarding the gathering of students’ parents*, ISNA (Apr. 16, 2023) (Doc. 143\_31).

<sup>351</sup> @IranIntl, X (Apr. 15, 2023) <https://x.com/IranIntl/status/1647176111489466368?s=20> ( (Doc. 147\_04).

<sup>352</sup> @IranIntl, X (Apr. 15, 2023) <https://x.com/IranIntl/status/1647159072242950147?s=20> (Doc. 147\_05); *see also* *People of Shahinshahr gathered to protest the chemical attacks on schools; crackdown forces attacked the protesters*, IRAN INT’L (Apr. 13, 2023) (Doc. 147\_03).

<sup>353</sup> @IranIntl, X (Apr. 15, 2023) (Doc. 147\_12) (only partially geolocated); *People of Shahinshahr gathered to protest the chemical attacks on schools; crackdown forces attacked the protesters*, IRAN INT’L (Apr. 13, 2023) (Doc. 147\_03).

<sup>354</sup> *Remarks by the Shahinshahr County Governor regarding the gathering of students’ parents*, ISNA (Apr. 16, 2023) (Doc. 143\_31).



### i. Case File Trends in Odors and Symptoms

We identified limited reporting for our cases on the specific odors students or eyewitnesses smelled, and as such these observations are by no means conclusory. From the sources we found through open-source research, there was a range of reported odors. Several students and eyewitnesses described the odor “like bleach,”<sup>355</sup> while others said it was “like burnt wires,”<sup>356</sup> “like hot pepper,”<sup>357</sup> “minty,”<sup>358</sup> “like a plastic balloon,”<sup>359</sup> “like boiled eggs or burnt sweets,”<sup>360</sup> “like rotten eggs,”<sup>361</sup> “similar to a rotten fish,”<sup>362</sup> “like regular gas but more salty,”<sup>363</sup> “metallic,”<sup>364</sup> or “not like typical city gas.”<sup>365</sup> One student described a changing smell, reporting that it first smelled like bleach and later smelled like vinegar.<sup>366</sup> And an ER doctor who treated girls from one case said that the girls described a “foul or rotting vegetable-like smell.”<sup>367</sup> State-affiliated media commonly reported simply an “unpleasant smell” with scant details about the specific odor.<sup>368</sup>

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<sup>355</sup> *Stink Bombs: New details about the poisoning incident of schoolgirls at two high schools and one elementary school in Borujerd*, HAM MIHAN (Feb. 27, 2023) (Doc. 255\_16).

<sup>356</sup> *Poisoning of 51 students and staff of Noor Vocational School in Qom*, IRIB (Dec. 14, 2022) (Doc. 287\_01).

<sup>357</sup> Citizen Journalist, *Anger over Saqqez School Poisonings Triggers more Security, Censorship*, IRAN WIRE (Apr. 10, 2023) (Doc. 220\_30).

<sup>358</sup> *Stink Bombs: New details about the poisoning incident of schoolgirls at two high schools and one elementary school in Borujerd*, HAM MIHAN (Feb. 27, 2023) (Doc. 255\_16); *Accounts of the female students of 13 Aban High School about the poisoning*, MEHR (Mar. 4, 2023) (Doc. 359\_31) (“spicy mint”).

<sup>359</sup> *The continued chemical attacks on girls' schools and the inaction of government officials in ensuring student safety*, CENTER FOR HUMAN RIGHTS IN IRAN (Apr. 25, 2023) (Doc. 147\_01).

<sup>360</sup> @Rfrenss, X (Mar. 1, 2023) <https://twitter.com/Rfrenss/status/1631007102968778765> (Doc. 359\_17).

<sup>361</sup> *Hajer and 13 Aban schools were also added to the list of poisonings / The school officials were only trying to evacuate the school and calm the situation / The smell of rotten eggs filled the air / The children were foaming at the mouth*, SHARGH DAILY (Mar. 1, 2023) (Doc. 359\_32).

<sup>362</sup> *Ramhormoz County Governor: The general condition of the poisoned students is good*, AKHARIN KHABAR (Mar. 5, 2023) (Doc. 184\_25) (county governor). Note that it is not clear whether the county governor was an eyewitness to the event.

<sup>363</sup> *Khayyam Pardis School*, PARDIS TV (Mar. 1, 2023) (Doc. 357\_13).

<sup>364</sup> *Khayyam Pardis School*, PARDIS TV (Mar. 1, 2023) (Doc. 357\_13).

<sup>365</sup> *Stink Bombs: New details about the poisoning incident of schoolgirls at two high schools and one elementary school in Borujerd*, HAM MIHAN (Feb. 27, 2023) (Doc. 255\_16).

<sup>366</sup> *Stink Bombs: New details about the poisoning incident of schoolgirls at two high schools and one elementary school in Borujerd*, HAM MIHAN (Feb. 27, 2023) (Doc. 255\_16).

<sup>367</sup> *The mystery of the unknown gas*, HAM MIHAN (Mar. 4, 2023).

<sup>368</sup> See, e.g., *Poisoning of students in some schools in Ardabil*, ISNA (Apr. 8, 2023) (Doc. 40\_27); *Two students from Tehranser School recount their poisoning experience*, ISNA (Mar. 1, 2023) (Doc. 359\_23) (“bitter”).

Symptoms visible from our case videos include struggling to breathe,<sup>369</sup> coughing,<sup>370</sup> apparent loss of ability to move legs,<sup>371</sup> difficulty walking,<sup>372</sup> apparent lack of consciousness,<sup>373</sup>

<sup>369</sup> @FatPixelFat, X (Apr. 8, 2023) <https://x.com/FatpixelFat/status/1644784349382955009?s=20> (Doc. 40\_06); @mizangorup, TELEGRAM (Apr. 8, 2023) <https://t.me/mizangorup/43860> (Doc. 40\_19); @mizangorup, TELEGRAM (Apr. 8, 2023) <https://t.me/mizangorup/43860> (Doc. 40\_22); @qom\_ziba INSTAGRAM (Dec. 13, 2022) [https://www.instagram.com/qome\\_ziba/reel/CmHPM0ejf0C/](https://www.instagram.com/qome_ziba/reel/CmHPM0ejf0C/) (Doc. 287\_10); @IranDidban, YOUTUBE (Apr. 11, 2023) <https://www.youtube.com/watch?v=sl9bDerHnm8> (Doc. 143\_03); @1500tasvir, X (Apr. 11, 2023) <https://twitter.com/1500tasvir/status/1645730729022693378> (Doc. 147\_02); @KanalJadidTV, YOUTUBE (Apr. 11, 2023) <https://www.youtube.com/watch?v=rLChAQWIA4> (Doc. 144\_01); @HengawO, X (Apr. 9, 2023) <https://twitter.com/HengawO/status/1644998757384159233> (Doc. 220\_01); @besmaili, X (Feb. 28, 2023) <https://x.com/besmaili/status/1630520873865101312> (Doc. 357\_03); *Poisoning of 51 students and staff of Noor Vocational School in Qom*, IRIB (Dec. 14, 2022) (Doc. 287\_01); @ManotoNews, X (Apr. 10, 2023) <https://x.com/ManotoNews/status/1645381108358590464> (Doc. 08\_06); @Gozareshgar, YOUTUBE (Apr. 10, 2023) <https://www.youtube.com/watch?v=ZBSSSG1bFEk> (Doc. 08\_07) (partially geolocated); @IranNewsAgency0, X (Apr. 11, 2023) <https://x.com/IranNewsAgency0/status/1645735703693721601> (Doc. 144\_07).

<sup>370</sup> @FatPixelFat, X (Apr. 8, 2023) <https://x.com/FatpixelFat/status/1644784349382955009?s=20> (Doc. 40\_06); @mizangorup, TELEGRAM (Apr. 8, 2023) <https://t.me/mizangorup/43860> (Doc. 40\_19); @mizangorup, TELEGRAM (Apr. 8, 2023) <https://t.me/mizangorup/43860> (Doc. 40\_22); @IranDidban, YOUTUBE (Apr. 11, 2023) <https://www.youtube.com/watch?v=sl9bDerHnm8> (Doc. 143\_03); @1500tasvir, X (Apr. 11, 2023) <https://twitter.com/1500tasvir/status/1645730729022693378> (Doc. 147\_02); @KanalJadidTV, YOUTUBE (Apr. 11, 2023) <https://www.youtube.com/watch?v=rLChAQWIA4> (Doc. 144\_01); @HengawO, X (Apr. 9, 2023) <https://twitter.com/HengawO/status/1644998757384159233> (Doc. 220\_01); @Gozareshgar, YOUTUBE (Apr. 10, 2023) <https://www.youtube.com/watch?v=ZBSSSG1bFEk> (Doc. 08\_07) (partially geolocated); @IranNewsAgency0, X (Apr. 11, 2023) <https://x.com/IranNewsAgency0/status/1645735703693721601> (Doc. 144\_07).

<sup>371</sup> @FatPixelFat, X (Apr. 8, 2023) <https://x.com/FatpixelFat/status/1644784349382955009?s=20> (Doc. 40\_04); @FatPixelFat, X (Apr. 8, 2023) <https://x.com/FatpixelFat/status/1644784349382955009?s=20> (Doc. 40\_06); @mizangorup, TELEGRAM (Apr. 8, 2023) <https://t.me/mizangorup/43860> (40\_18); @mizangorup, TELEGRAM (Apr. 8, 2023) <https://t.me/mizangorup/43860> (Doc. 40\_20); @mizangorup, TELEGRAM (Apr. 8, 2023) <https://t.me/mizangorup/43860> (Doc. 40\_22); *Poisoning of 51 students and staff of Noor Vocational School in Qom*, IRIB (Dec. 14, 2022) (Doc. 287\_01); @ManotoNews, X (Dec. 13, 2022) <https://x.com/ManotoNews/status/1602644763014201345> (Doc. 287\_02); @IranDidban, YOUTUBE (Apr. 11, 2023) <https://www.youtube.com/watch?v=sl9bDerHnm8> (Doc. 143\_03); @KanalJadidTV, YOUTUBE (Apr. 11, 2023) <https://www.youtube.com/watch?v=rLChAQWIA4> (Doc. 144\_01); @HengawO, X (Apr. 9, 2023) <https://twitter.com/HengawO/status/1644998757384159233> (Doc. 220\_01); @ManotoNews, X (Apr. 10, 2023) <https://x.com/ManotoNews/status/1645381108358590464> (Doc. 08\_06).

<sup>372</sup> @ManotoNews, X (Dec. 13, 2022) <https://x.com/ManotoNews/status/1602644763014201345> (Doc. 287\_02) (unable to move); *Stink Bombs: New details about the poisoning incident of schoolgirls at two high schools and one elementary school in Borujerd*, HAM MIHAN (Feb. 27, 2023) (Doc. 255\_16) (affected student lost feeling in her legs and then fell down the stairs); @masih\_alinejad, TELEGRAM (Feb. 28, 2023) [https://t.me/masih\\_alinejad/20510](https://t.me/masih_alinejad/20510) (Doc. 357\_09) (affected student being helped out of the schoolyard, having difficulty walking); @radiojibi, X (Mar. 1, 2023) <https://x.com/radiojibi/status/1630979646136229888> (Doc. 359\_01) (affected student lying down and being picked up by a medical professional, appearing unable to move); @Farsi\_Iranwire, TELEGRAM (Mar. 5, 2023) [https://t.me/Farsi\\_Iranwire/63071](https://t.me/Farsi_Iranwire/63071) (Doc. 184\_01) (affected student being carried into the ER) (not fully geolocated); @HengawO, X (Mar. 5, 2023) <https://twitter.com/HengawO/status/1632314794278547456> (Doc. 184\_09) (same); @FatPixelFat, X (Apr. 8, 2023) <https://x.com/FatpixelFat/status/1644784349382955009?s=20> (Doc. 40\_04); @FatPixelFat, X (Apr. 8, 2023) <https://x.com/FatpixelFat/status/1644784349382955009?s=20> (Doc. 40\_06); @mizangorup, TELEGRAM (Apr. 8, 2023) <https://t.me/mizangorup/43860> (40\_18); @mizangorup, TELEGRAM (Apr. 8, 2023) <https://t.me/mizangorup/43860> (Doc. 40\_20); @mizangorup, TELEGRAM (Apr. 8, 2023) <https://t.me/mizangorup/43860> (Doc. 40\_22) (all showing girls having to be helped down the stairs and across the street); @HengawO, X (Apr. 9, 2023) <https://twitter.com/HengawO/status/1644998757384159233> (Doc. 220\_01) (affected student being carried); @centerforhumanrights, INSTAGRAM (Apr. 10, 2023) <https://www.instagram.com/p/Cq3mF16PMtb/> (Doc. 08\_01) (affected student struggling to get up, and several people have to help her up); @ManotoNews, X (Apr. 10, 2023)

dizziness,<sup>374</sup> and vomiting.<sup>375</sup> State-affiliated media confirmed most of these symptoms in their own reporting on our cases, including difficulty breathing,<sup>376</sup> coughing,<sup>377</sup> numbness or lack of feeling in legs (even days later),<sup>378</sup> difficulty walking or moving,<sup>379</sup> dizziness,<sup>380</sup> nausea,<sup>381</sup> and vomiting,<sup>382</sup> adding headaches, burning throat, and fever to the reported list of symptoms girls experienced.<sup>383</sup> However, media reporting often included qualifiers explaining that no student had “acute or dangerous respiratory symptoms,” and typically used generic words like “lethargy” or “shortness of breath” when discussing girls’ symptoms, possibly in an effort to downplay the severity of girls’ symptoms, provide room for speculation that girls’ symptoms were

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<https://x.com/ManotoNews/status/1645381108358590464> (Doc. 08\_06) (another affected student struggling to stand, and is similarly helped); @IranDidban, YOUTUBE (Apr. 11, 2023) <https://www.youtube.com/watch?v=sl9bDerHnm8> (Doc. 143\_03) (affected student being helped into an ambulance, and her legs give out); @KanalJadidTV, YOUTUBE (Apr. 11, 2023) [https://www.youtube.com/watch?v=\\_rLChAQWIA4](https://www.youtube.com/watch?v=_rLChAQWIA4) (Doc. 144\_01) (affected student helped by two people, and she appears to be struggling to walk).

<sup>373</sup> @radiojibi, X (Mar. 1, 2023) <https://x.com/radiojibi/status/1630979646136229888> (Doc. 359\_01); @KanalJadidTV, YOUTUBE (Apr. 11, 2023) [https://www.youtube.com/watch?v=\\_rLChAQWIA4](https://www.youtube.com/watch?v=_rLChAQWIA4) (Doc. 144\_01); @HengawO, X (Apr. 9, 2023) <https://twitter.com/HengawO/status/1644998757384159233> (Doc. 220\_01).

<sup>374</sup> @centerforhumanrights, INSTAGRAM (Apr. 10, 2023) <https://www.instagram.com/p/Cq3mF16PMtb/> (Doc. 08\_01).

<sup>375</sup> @centerforhumanrights, INSTAGRAM (Apr. 10, 2023) <https://www.instagram.com/p/Cq3mF16PMtb/> (Doc. 08\_01).

<sup>376</sup> *Poisoning of schoolgirls in Ardabil, Khuzestan, and Urmia*, AFTAB NEWS (Apr. 8, 2023) (Doc. 40\_25); *Poisoning of 115 female students in Ramhormoz*, ISNA (Mar. 5, 2023) (Doc. 184\_10); *Poisoning of 51 students and staff of Noor Vocational School in Qom*, IRIB (Dec. 14, 2022) (Doc. 287\_01).

<sup>377</sup> *An account from one of the students about the serial poisonings at Ahmadiyeh School in Borujerd*, TASNIM (Feb. 25, 2023) (Doc. 255\_10).

<sup>378</sup> *Poisoning of 51 students and staff of Noor Vocational School in Qom*, IRIB (Dec. 14, 2022) (Doc. 287\_01); *An account from one of the students about the serial poisonings at Ahmadiyeh School in Borujerd*, TASNIM (Feb. 25, 2023) (Doc. 255\_10); *Serial poisoning of schoolgirls reaches Ardabil / 108 students transferred to hospital*, IRNA (Mar. 1, 2023) (Doc. 40\_26); *What did the poisoned students from Qom say about the repeated incident at Noor Technical School?* ISNA (Dec. 15, 2022) (Doc. 287\_19).

<sup>379</sup> *Poisoning of 51 students and staff of Noor Vocational School in Qom*, IRIB (Dec. 14, 2022) (Doc. 287\_01); *What did the poisoned students from Qom say about the repeated incident at Noor Technical School?* ISNA (Dec. 15, 2022) (Doc. 287\_19).

<sup>380</sup> *Poisoning of 51 students and staff of Noor Vocational School in Qom*, IRIB (Dec. 14, 2022) (Doc. 287\_01); *Poisoning of students at the 15 Khordad Girls' High School in Borujerd*, IRNA (Feb. 26, 2023) (Doc. 257\_01); *An account from one of the students about the serial poisonings at Ahmadiyeh School in Borujerd*, TASNIM (Feb. 25, 2023) (Doc. 255\_10).

<sup>381</sup> *Serial poisoning of schoolgirls reaches Ardabil / 108 students transferred to hospital*, IRNA (Mar. 1, 2023) (Doc. 40\_26); *Poisoning of students at the 15 Khordad Girls' High School in Borujerd*, IRNA (Feb. 26, 2023) (Doc. 257\_01); *Poisoning of 51 students and staff of Noor Vocational School in Qom*, IRIB (Dec. 14, 2022) <https://www.aparat.com/v/t50llyp> (Doc. 287\_01); *Two students from Tehranser School recount their poisoning experience*, ISNA (Mar. 1, 2023) (Doc. 359\_23) (reporting that students described their stomachs feeling “heavy”).

<sup>382</sup> *Serial poisoning of schoolgirls reaches Ardabil / 108 students transferred to hospital*, IRNA (Mar. 1, 2023) (Doc. 40\_26).

<sup>383</sup> *Poisoning of students at the 15 Khordad Girls' High School in Borujerd*, IRNA (Feb. 26, 2023) (Doc. 257\_01); *Poisoning of 15 Khordad Borujerd students / Most of the students have been discharged*, ISNA (Feb. 26, 2023) (Doc. 257\_05); *Poisoning of 51 students and staff of Noor Vocational School in Qom*, IRIB (Dec. 14, 2022) (Doc. 287\_01); *An account from one of the students about the serial poisonings at Ahmadiyeh School in Borujerd*, TASNIM (Feb. 25, 2023) (Doc. 255\_10); *Poisoning of students in some schools in Ardabil*, ISNA (Apr. 8, 2023) (Doc. 40\_27); *Serial poisoning of schoolgirls reaches Ardabil / 108 students transferred to hospital*, IRNA (Mar. 1, 2023) (Doc. 40\_26); *Two students from Tehranser School recount their poisoning experience*, ISNA (Mar. 1, 2023) (Doc. 359\_23).

psychological, and to attempt to provide a unified state message around these incidents, all while limiting the specificity of information shared.<sup>384</sup>

Media interviews with doctors or healthcare professionals who cared for girls affected by the poisoning incidents reported symptoms that included headaches, dizziness, difficulty breathing, lethargy, drowsiness, nausea, vomiting, and low blood pressure.<sup>385</sup> Media interviews with students affected by the poisonings reported symptoms including dizziness, headache, shortness of breath, chest pain, heart palpitations, tingling hands, numbness in or loss of use of legs, and nausea.<sup>386</sup> One also reported burning eyes.<sup>387</sup> Interviewed parents of affected students reported vomiting,<sup>388</sup> teary eyes,<sup>389</sup> and low oxygen levels in the blood.<sup>390</sup>

Other reporting on our cases from non-state affiliated news agencies inside of Iran and outlets based outside of Iran similarly identified symptoms such as numbness in legs and feet, nausea, shortness of breath, and fatigue, reflecting what our case videos depict.<sup>391</sup> Finally, beyond our cases, reporting on other incidents seemed to largely mirror the symptoms we identified for our

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<sup>384</sup> *Poisoning of students in some schools in Ardabil*, ISNA (Apr. 8, 2023) (Doc. 40\_27); *Poisoning of 115 female students in Ramhormoz*, ISNA (Mar. 5, 2023) (Doc. 184\_10); *More than 60 critically ill students in Ramhormoz were sent to medical centers*, IRIB (Mar. 5, 2023) (Doc. 184\_22); *An account from one of the students about the serial poisonings at Ahmadiyeh School in Borujerd*, TASNIM (Feb. 25, 2023) (Doc. 255\_10); *Poisoning of 15 Khordad Borujerd students / Most of the students have been discharged*, ISNA (Feb. 26, 2023) (Doc. 257\_05); *The cause of the poisoning of students at Khayyam School in Pardis has been identified*, MEHR (Mar. 2, 2023) (Doc. 357\_21); see also *Suspected Poisonings Continue; Hengaw: Some Principals in Baneh Asked Students to Stay at Home*, RADIO FARDA (Apr. 11, 2023) <https://www.radiofarda.com/a/iran-school-poisoning-continues/32358701.html> (reporting on the state's announcement banning reporting on incidents of chemical attacks against schools and describing a seemingly unified reporting message by state media in prior days, using words like "lethargy").

<sup>385</sup> *Stink Bombs: New details about the poisoning incident of schoolgirls at two high schools and one elementary school in Borujerd*, HAM MIHAN (Feb. 27, 2023) (Doc. 255\_16); *Families are worried, officials remain silent / Hospitals are not testing the poisoned students / Testing has been left to the families*, SHARGH DAILY (Feb. 27, 2023) (Doc. 257\_28).

<sup>386</sup> *Stink Bombs: New details about the poisoning incident of schoolgirls at two high schools and one elementary school in Borujerd*, HAM MIHAN (Feb. 27, 2023) (Doc. 255\_16) (all); *The continued chemical attacks on girls' schools and the inaction of government officials in ensuring student safety*, CENTER FOR HUMAN RIGHTS IN IRAN (Apr. 25, 2023) (Doc. 147\_01) (loss of leg use, nausea, burning eyes).

<sup>387</sup> *The continued chemical attacks on girls' schools and the inaction of government officials in ensuring student safety*, CENTER FOR HUMAN RIGHTS IN IRAN (Apr. 25, 2023) (Doc. 147\_01).

<sup>388</sup> *Hajer and 13 Aban schools were also added to the list of poisonings / The school officials were only trying to evacuate the school and calm the situation / The smell of rotten eggs filled the air / The children were foaming at the mouth*, SHARGH DAILY (Mar. 1, 2023) (Doc. 359\_32).

<sup>389</sup> *Hajer and 13 Aban schools were also added to the list of poisonings / The school officials were only trying to evacuate the school and calm the situation / The smell of rotten eggs filled the air / The children were foaming at the mouth*, SHARGH DAILY (Mar. 1, 2023) (Doc. 359\_32).

<sup>390</sup> *Stink Bombs: New details about the poisoning incident of schoolgirls at two high schools and one elementary school in Borujerd*, HAM MIHAN (Feb. 27, 2023) (Doc. 255\_16).

<sup>391</sup> *The continued chemical attacks on girls' schools and the inaction of government officials in ensuring student safety*, CENTER FOR HUMAN RIGHTS IN IRAN (Apr. 25, 2023) (Doc. 147\_01); *Stink Bombs: New details about the poisoning incident of schoolgirls at two high schools and one elementary school in Borujerd*, HAM MIHAN (Feb. 27, 2023) (Doc. 255\_16); *What was the story behind the poisoning of students in Shahinshahr?* SHAHINSHAHRI INDEPENDENT NEWS AGENCY (Apr. 11, 2023) (Doc. 143\_17).



cases, including dizziness, numbness, difficulty breathing and coughing, and nausea.<sup>392</sup> Some sources also detailed neurological effects like stuttering, loss of vision, or paralysis.<sup>393</sup>

In addition, in only two cases were irritated eyes reported as a symptom.<sup>394</sup> Only one state-affiliated news source we identified for our cases ever mentioned this as a symptom,<sup>395</sup> and we did not identify any videos in which irritated eyes were apparent (like redness or rubbing of eyes), though admittedly it is difficult to tell this minute detail in our case videos. As discussed in greater detail below, this matters because it decreases (though does not eliminate) the likelihood that our cases involved tear gas or pepper spray like tear gas.

Finally, while most state-affiliated reporting declared that the effects wore off after a few hours, this was not ubiquitous. Some sources, including an Iranian MP and Iranian-based news agencies that interviewed students and their parents, reported symptoms lasting several days after the

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<sup>392</sup> See, e.g., *Stink Bombs: New details about the poisoning incident of schoolgirls at two high schools and one elementary school in Borujerd*, HAM MIHAN (Feb. 27, 2023) (Doc. 255\_16) (reporting on an incident on March 23, 2023 affecting Fereshtegan Elementary School in Borujerd, Lorestan and describing symptoms as reported by the father of a student as dizziness and nausea, and on Ahmadiyyah High School in Borujerd, Lorestan, in which one student narrated their experience and described dizziness, chest pain, numbness in legs, and nausea); @RadioFarda, TELEGRAM (Apr. 8, 2023) <https://t.me/radiofarda/102763> (nausea and vomiting); @AvaToday, X (Mar. 5, 2023) (nausea, suffocation, vomiting and fainting); Elina Farhadi, *Exposure to Unknown Chemicals: Signs and Symptoms*, DW (Mar. 6, 2023) (“dizziness, headache, respiratory distress, muscle cramps and numbness and neurological symptoms were reported in the poisoned students”); *The Continuation of Chemical Attacks on Girls’ Schools and the Inaction of Government Officials and Officials in Ensuring the Safety of Students*, CENTER FOR HUMAN RIGHTS IN IRAN (Apr. 25, 2023) <https://persian.iranhumanrights.org/1402/02/school-girls-continue-to-face-chemical-attacks-officials-refuse-to-provide-security/> (dizziness, coughing, nausea, numbness in hands and feet); *Chemical Attacks on Dozens of Schools on Saturday: ‘The Agent of Poisoning is a Combination of Several Gases,’* IRAN INTERNATIONAL (Mar. 4, 2023) (quoting the vice-chair of the Iranian Parliament’s Health and Treatment Commission as listing out symptoms including vomiting, coughing, and shortness of breath) <https://www.iranintl.com/202303044841>; see also *Comparison of Schools*, @1500TASVIR (detailing similar symptoms in most of the 42 cases examined, including numbness of limbs, dizziness, nausea, coughing, difficulty breathing, though no sources are provided for this information).

<sup>393</sup> See Elina Farhadi, *supra* note 392; *Stink Bombs: New details about the poisoning incident of schoolgirls at two high schools and one elementary school in Borujerd*, HAM MIHAN (Feb. 27, 2023) (Doc. 255\_16); see also @1500Tasvir, *supra* note 392 (describing such symptoms in 15 of the 42 cases examined).

<sup>394</sup> *The continued chemical attacks on girls’ schools and the inaction of government officials in ensuring student safety*, CENTER FOR HUMAN RIGHTS IN IRAN (Apr. 25, 2023) (Doc. 147\_01); *Hajer and 13 Aban schools were also added to the list of poisonings / The school officials were only trying to evacuate the school and calm the situation / The smell of rotten eggs filled the air / The children were foaming at the mouth*, SHARGH DAILY (Mar. 1, 2023) (Doc. 359\_32); *The latest news on the poisoning of students today, 10 Esfand 1401 (March 1, 2023)*, TEJARAT NEWS (Mar. 1, 2023) (Doc. 359\_08); see also *Chemical Attack on About 80 Schools on Sunday; Accusing Students of ‘Playing Movies,’* IRAN INTERNATIONAL (Mar. 5, 2023) <https://www.iranintl.com/202303055637> (quoting ISNA, the Iranian State News Agency, as listing some symptoms such as bloodshot eyes for cases other than the ones we’ve looked into). Note that @1500Tasvir’s list of odors and symptoms reported for 42 cases includes burning eyes as a symptom for 9 cases. However, no sources are provided for this information, making it difficult to rely heavily on this source. Additionally, though not necessarily caused by eye irritation, some external news sources reporting generally on these incidents identified long-term adverse effects to vision as a symptom. See, e.g., Solmaz Eikdar, *Shia Extremists Suspected in Schoolgirl Poisonings in Iran*, IRANWIRE (Feb. 27, 2023) <https://iranwire.com/en/news/114248-shia-extremists-suspected-in-schoolgirl-poisonings-in-iran/> (describing “reports” of blindness and vision loss, without specifying which cases or sources).

<sup>395</sup> *Tasnim reporter’s account from in front of a school in Tehran’s Tehransar neighborhood / The complex mystery of student poisonings*, TASNIM (Mar. 1, 2023) (Doc. 359\_29). Note as well that this Tasnim article casts doubt on the incident on which it reports.



incidents occurred; such symptoms included coughing, dizziness, chest pain, difficulty breathing, and muscle weakness.<sup>396</sup> Other sources reported that some girls were kept overnight, although the reason for their stay was not specified.<sup>397</sup> This suggests that the effects were not merely psychological.

## ii. Toxic Agent Possibilities

Unfortunately, the trends in odors and symptoms that we identified provide limited information about the possible toxic agent used. For one, several officials inside of Iran observed that the poison substances were inhaled, ruling out gastrointestinal poisoning; assuming this is true, this narrows possibilities, but not significantly.<sup>398</sup> Indeed, the symptoms we identified in our cases are otherwise relatively generic, and we weren't able to obtain systematic and reliable open-source information about odors. Further complicating things, observers and Iranian officials inside of the country have speculated that the toxic agent used was not one but several toxic agents,<sup>399</sup> a fact that Iranian officials themselves appear to have confirmed in early March.<sup>400</sup> Ultimately, toxicological assessments based on representative samples from affected schoolchildren would be required to determine the toxic agents used.<sup>401</sup> Nevertheless, we have detailed below several possibilities, based on trends outlined in Part I.<sup>402</sup> They were assessed by applying the odors and symptomatic trends identified in our cases to medical descriptions of poisoning symptoms for four possible toxic agents. The toxic agents were identified through

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<sup>396</sup> *Stink Bombs: New details about the poisoning incident of schoolgirls at two high schools and one elementary school in Borujerd*, HAM MIHAN (Feb. 27, 2023) (Doc. 255\_16).

<sup>397</sup> *What was the story behind the poisoning of students in Shahinshahr?* SHAHINSHAHRI INDEPENDENT NEWS AGENCY (Apr. 11, 2023) (Doc. 143\_17).

<sup>398</sup> *Chemical Attacks on Dozens of Schools on Saturday; 'The Agent of Poisoning is a Combination of Several Gases,'* IRAN INTERNATIONAL (Mar. 4, 2023) (quoting the vice-chair of the Iranian Parliament's Health and Treatment Commission as saying that the cause of students' poisoning is "inhalation") <https://www.iranintl.com/202303044841>; *The Latest News of Student Poisoning Today, Esfand 10, 1401*, TEJARAT NEWS (Mar. 1, 2023) <https://tejaratnews.com/%D8%A8%D8%AE%D8%B4-%D8%AC%D8%A7%D9%85%D8%B9%D9%87-46/766343-%D8%AC%D8%AF%DB%8C%D8%AF%D8%AA%D8%B1%DB%8C%D9%86-%D8%A7%D8%AE%D8%A8%D8%A7%D8%B1-%D9%85%D8%B3%D9%85%D9%88%D9%85%DB%8C%D8%AA-%D8%AF%D8%A7%D9%86%D8%B4-%D8%A2%D9%85> (describing an MP from Isfahan as telling KhabarOnline, an Iranian news outlet, that the state investigations had ruled out gastrointestinal poisoning, and that they had been poisoned by inhalation).

<sup>399</sup> See, e.g., *Chemical Attacks on Dozens of Schools on Saturday; 'The Agent of Poisoning is a Combination of Several Gases,'* IRAN INTERNATIONAL (Mar. 4, 2023) (quoting the vice-chair of the Iranian Parliament's Health and Treatment Commission as possibility involving a combination of several gases) <https://www.iranintl.com/202303044841>; *Attacks with Poison Gas on Girls' Schools in Iran Continues; Hashemian: Ordinary People Cannot Access Combined Gases*, RADIO FRANCE INTERNATIONAL (Mar. 5, 2023) (quoting Dr. Mohammadreza Hashemian, an expert in the special care department of Masih Deneshvari Hospital in an interview with a local Iranian newspaper saying that these incidents involved "mixed gases [...] for poisoning" not accessible by ordinary people).

<sup>400</sup> *Timeline of the student poisoning incident; everything everyone said from the beginning to today*, ROUYDAD24 (Mar. 10, 2023).

<sup>401</sup> Michele Catanzaro, *Suspected Iran Schoolgirl Poisonings: What Scientists Know*, NATURE (Mar. 13, 2023) <https://www.nature.com/articles/d41586-023-00754-2> (detailing toxicologist Alastair Hay's view that a "comprehensive toxicological screen" with a "representative number of cases" is needed).

<sup>402</sup> These trends were identified by grouping all reported odors and symptoms from the sources from case files, along with symptoms visible from multimedia included in our case files. All sources are open-source, and include videos posted on social media or shared by news outlets, domestic news reporting, international news reporting, NGO reports, and state-affiliated news outlets.

consultations with experts and suggestions by news coverage made by experts or Iranian investigators, and are ranked in order of likelihood.

### 1. *Hydrogen Sulfide Gas*

One possibility is hydrogen sulfide gas, which targets the respiratory tract and nervous system.<sup>403</sup> When inhaled for short periods, hydrogen sulfide gas commonly causes respiratory difficulties like coughing and difficulty breathing.<sup>404</sup> Other effects, depending on the period of exposure and the concentration of hydrogen sulfide, may include headaches, dizziness, fatigue and lethargy, nausea and vomiting, decreased response rates, and decreased motor activity.<sup>405</sup> Eye irritation can also occur, particularly for higher concentrations over prolonged periods of exposure of at least one hour long.<sup>406</sup> Very high levels of exposure can cause someone to lose consciousness and die.<sup>407</sup> Some research has also shown that short-term, high concentrations of hydrogen sulfide may produce what is commonly referred to as “knockdown,” in which persons exposed to hydrogen sulfide gas briefly lose consciousness and then make an immediate full recovery.<sup>408</sup>

Many of these symptoms line up with symptomatic trends from our case videos, including coughing, difficulty breathing, impaired motor skills (which could have affected some of the girls’ ability to walk), vomiting, dizziness, and losses of consciousness. Other symptoms, like headaches, and even lethargy, a common word used to describe the girls’ symptoms in state media reporting, line up with third party reports and even state-affiliated media reporting on girls’ symptoms. In addition, hydrogen sulfide gas is colorless and produces a range of odors depending on its concentration, with lower levels often described as a “rotten” odor and higher concentrations described as “sweet.”<sup>409</sup> It also may, at higher concentrations, inhibit one’s ability

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<sup>403</sup> *ToxGuide for Hydrogen Sulfide H<sub>2</sub>S*, U.S. DEP’T OF HEALTH AND HUMAN SERVICES 2 (Dec. 2016) <https://www.atsdr.cdc.gov/toxguides/toxguide-114.pdf?id=1088&tid=67>.

<sup>404</sup> See *Toxicological Profile for Hydrogen Sulfide and Carbonyl Sulfide*, U.S. DEP’T HEALTH AND HUMAN SERVICES 54-59, 73 <https://www.atsdr.cdc.gov/toxprofiles/tp114.pdf> (summarizing key findings from peer-reviewed scientific studies examining the health effects of hydrogen sulfide exposure) (hereinafter “Toxicological Profile”).

<sup>405</sup> *Id.*; see also *Hydrogen Sulfide (H<sub>2</sub>S)*, U.S. AGENCY FOR TOXIC SUBSTANCES AND DISEASE REGISTRY 5 <https://www.atsdr.cdc.gov/mhmi/mmgl114.pdf>; Saswati Das, *Chapter 20 – Toxic Gases in TOXICOLOGY CASES FOR THE CLINICAL FORENSIC LABORATORY* 387-96 (2020); *Hydrogen Sulfide Patient Information Sheet*, U.S. AGENCY FOR TOXIC SUBSTANCES AND DISEASE REGISTRY 1 <https://www.atsdr.cdc.gov/MHMI/mmgl114-handout.pdf>.

<sup>406</sup> See *Hydrogen Sulphide: Toxicological Overview*, PUBLIC HEALTH ENGLAND 6 [https://assets.publishing.service.gov.uk/media/5a7f9c0c40f0b62302690879/hydrogen\\_sulphide\\_toxicological\\_overview.pdf](https://assets.publishing.service.gov.uk/media/5a7f9c0c40f0b62302690879/hydrogen_sulphide_toxicological_overview.pdf) (detailing two peer-reviewed studies showing that exposure to hydrogen sulfide gas for over one hour in one study and 6-7 hours in a second study can irritate the eye); *Toxicological Profile*, *supra* note 404 at 59 (identifying one peer-reviewed scientific study that found eye irritation when eyes were directly exposed to hydrogen sulfide gas for several hours); see also Anthony Sawaya et. al., *Hydrogen Sulfide Toxicity*, STATPEARLS (May 2, 2024) <https://www.ncbi.nlm.nih.gov/books/NBK559264/> (identifying eye irritation as a possible symptom when it is directed at someone’s eyes, which can occur for longer durations of exposure).

<sup>407</sup> *Hydrogen Sulfide Hazards*, U.S. OCCUPATIONAL SAFETY AND HEALTH ADMIN. <https://www.osha.gov/hydrogen-sulfide/hazards> (outlining short-term symptoms and effects depending on the level of concentration of hydrogen sulfide gas).

<sup>408</sup> See Byungkuk Nam et. al., *Neurologic Sequela of Hydrogen Sulfide Poisoning*, 42 INDUSTRIAL HEALTH 83-7 (2004) <https://pubmed.ncbi.nlm.nih.gov/14964623/> (detailing “knockdown,” or the sudden, brief loss of consciousness, followed by an immediate full recovery, among oil workers exposed to short-term, high concentrations of hydrogen sulfide).

<sup>409</sup> *Id.*

to smell its odor at all.<sup>410</sup> These variations could partially explain the varied odor descriptions from our cases and align with reports of a rotting odor. Another feature of hydrogen sulfide is that it is not easily detectable in blood samples,<sup>411</sup> which could help explain reports about a U.K.-based toxicology expert who examined blood samples from affected schoolchildren but did not find evidence of any toxic agents.<sup>412</sup> In addition, although recovery times vary depending on the severity of symptoms, rapid recovery – within 24 hours – is not discordant with hydrogen sulfide gas exposure.<sup>413</sup>

Hydrogen sulfide is a possibility for these cases given the similar symptomatic profile, but it is misaligned with some symptoms reported in our cases. For example, in several of our cases, eyewitnesses, state-affiliated media, and third parties reported lack of feeling in the legs among girls exposed to the gas, a symptom that is not among the common symptoms of hydrogen sulfide gas inhalation. In addition, it is not clear that inhaling hydrogen sulfide for relatively short periods of time commonly produces nausea and vomiting, which could be seen in videos for one case and were frequently reported symptoms in others.<sup>414</sup>

In sum, it is possible that hydrogen sulfide is the substance that was used in these poisoning attacks, but it is an imperfect fit, and expert examination of toxicology reports in this area is required to know for sure. In addition, it would be interesting to know whether any affected schoolchildren initially smelled a strong odor like rotten eggs followed by no smell at all, which could indicate the presence of hydrogen sulfide.<sup>415</sup>

## 2. Chloramine or Ammonia Gas

A second possibility is that the toxic substance involved was chloramine (made up of ammonia gas and another substance, like bleach) or ammonia gas on its own.<sup>416</sup> This was suggested by

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<sup>410</sup> *Toxicological Profile*, *supra* note 404 at 14.

<sup>411</sup> Shigetoshi Kage et. al., *The Usefulness of Thiosulfate as an Indicator of Hydrogen Sulfide Poisoning: Three Cases*, 110 INT’L J. LEGAL MED. 220-2 (1997) <https://pubmed.ncbi.nlm.nih.gov/9274948/> (finding that blood samples did not detect exposure for hydrogen sulfide); Yanjun Ding et. al., *A Rapid Evaluation of Acute Hydrogen Sulfide Poisoning in Blood Based on DNA-Cu/Ag Nanocluster Fluorescence Probe*, 7 SCIENTIFIC REPORTS (Aug. 29, 2017) <https://www.nature.com/articles/s41598-017-09960-1> (reporting that there is “no uniform and reliable standard” to identify hydrogen sulfide concentrations in blood samples for identification).

<sup>412</sup> *Are Iranian Schoolgirls Being Poisoned by Toxic Gas?* BBC NEWS (Mar. 3, 2023) <https://www.bbc.com/news/world-middle-east-64829798> (reporting that professor of environmental toxicology Alastair Hay reviewed alleged blood test results from some of the affected schoolchildren and said that no toxins had been detected).

<sup>413</sup> See, e.g., Xianqin Wang et. al., *The Effects of Acute Hydrogen Sulfide Poisoning on Cytochrome P450 Isoforms Activity in Rats*, BIOCHEMISTRY RES. INT. 1 (2014) (describing “complete and rapid” recovery as typical for “transient” exposure to hydrogen sulfide) <https://www.ncbi.nlm.nih.gov/pmc/articles/PMC3984826/pdf/BMRI2014-209393.pdf>; *Medical Management Guidelines for Hydrogen Sulfide*, U.S. AGENCY FOR TOXIC SUBSTANCES AND DISEASE REGISTRY (recommending that patients with hydrogen sulfide poisoning be observed for 24 hours for signs of pulmonary edema where patients were “seriously exposed” by inhalation).

<sup>414</sup> See, e.g., *Toxicological Profile*, *supra* note 404 (detailing symptoms from peer-reviewed research studies on the health effects of various concentrations of and periods of exposure to hydrogen sulfide, and not including nausea or vomiting for acute – less than 1 day – exposure).

<sup>415</sup> See Anthony Sawaya et. al., *supra* note 406 (noting that odor detection followed by odor paralysis is a “unique toxidrome” in hydrogen sulfide gas).

<sup>416</sup> Though the two are separate gases, chloramine gas is formed by mixing an ammonia product with another substance like bleach, whereas ammonia gas is formed simply from the presence of ammonia. See Maj. Thomas A.

Keith Ward, a U.S.-based chemist who has previously advised human rights organizations in cases involving chemical or biological weapons, and who speculated about possible toxic agents in these cases for a news roundup produced by the scientific journal *Nature*.<sup>417</sup> It was also suggested by an Iranian officials investigating the poisoning incidents.<sup>418</sup> Common symptoms of higher exposure to ammonia gas include coughing, stomach pain, burning nose, throat, lungs, or eyes, nausea, vomiting, and skin redness or blistering.<sup>419</sup> Similarly, symptoms of chloramine gas exposure include difficulty breathing and coughing, with higher levels of exposure producing more intensive effects on one's lungs and throat.<sup>420</sup> Coughing and difficulty breathing were common symptoms we viewed in videos of our cases, and vomiting was visible in videos for one of our cases. An affected girl can also be heard in the background of a video for another case complaining that her throat burned. State-affiliated news outlets reported many of these symptoms as well. Although some common symptoms of ammonia or chloramine poisoning, like skin redness and blistering, were not evident in the symptomatic trends we were able to observe, such skin-related effects typically occur only where there is a relatively high concentration of ammonia gas, which could explain the discrepancy.<sup>421</sup> Symptoms of ammonia gas poisoning may subside within 24-48 hours, and although greater exposure may prolong recovery, the reported rapid recovery of many affected girls does not appear completely discordant with ammonia or chloramine gas exposure,<sup>422</sup> although in some cases girls were reported to have recovered far quicker.

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Pascuzzi & Maj. Alan B. Storrow, *Mass Casualties from Acute Inhalation of Chloramine Gas*, 163 MILITARY MEDICINE 102, 103 (1998) <https://pubmed.ncbi.nlm.nih.gov/9503902/> (describing the relationship between chloramines and ammonia by detailing that chloramines are typically produced by mixing common household cleaning products bleach and ammonia; when chloramines come into contact with a person's nose, mouth, or lungs - among other areas of the body - they form ammonia gas and hypochlorous acid).

<sup>417</sup> Michele Catanzaro, *Suspected Iran Schoolgirl Poisonings: What Scientists Know*, 615 NATURE: NEWS IN FOCUS (Mar. 23, 2023) <https://www.nature.com/articles/d41586-023-00754-2.pdf>.

<sup>418</sup> See, e.g., *The Story of Serial Poisonings, Roots and Possibilities*, IRNA (Mar. 1, 2023) (quoting Manadi Sefidan, the head of Parliament's Education Commission, who alleged that "based on testing results, N2 (ammonia) was present in the poison released in schools").

<sup>419</sup> See *Ammonia: Exposure, Decontamination, Treatment*, U.S. CENTER FOR DISEASE CONTROL AND PREVENTION [https://www.cdc.gov/chemicalemergencies/factsheets/ammonia.html#anchor\\_02225](https://www.cdc.gov/chemicalemergencies/factsheets/ammonia.html#anchor_02225); *Acute Exposure Guideline Levels for Selected Airborne Chemicals: Volume 6*, NATIONAL RESEARCH COUNCIL (US) COMMITTEE ON ACUTE EXPOSURE GUIDELINE LEVELS (2008) <https://www.ncbi.nlm.nih.gov/books/NBK207883/>.

<sup>420</sup> See Maj. Thomas A. Pascuzzi & Maj. Alan B. Storrow, *supra* note 416 at 103; David A. Tanen, M.D. et. al., *Severe Lung Injury After Exposure to Chloramine Gas from Household Cleaners*, NEW ENGLAND J. MEDICINE (1999) <https://www-nejm-org.stanford.idm.oclc.org/doi/full/10.1056/NEJM199909093411115>.

<sup>421</sup> See Gary A. Birken, Peter J. Fabri, & Larry Carey, *Acute Ammonia Intoxication Complicating Multiple Trauma*, 21 J TRAUMA 820-2 (Sept. 1981) <https://pubmed.ncbi.nlm.nih.gov/7277552/>; see also *Acute Exposure Guideline Levels for Selected Airborne Chemicals: Volume 6*, *supra* note 419 (summarizing peer-reviewed literature on ammonia gas exposure, and detailing short-term recoveries from severe but short exposure to ammonia gas as averaging 6 days).

<sup>422</sup> See Steven Issley, M.D., *Ammonia Toxicity*, MEDSCAPE (Apr. 11, 2022) <https://emedicine.medscape.com/article/820298-overview?form=fpf>; see also *Medical Management Guidelines for Ammonia*, U.S. AGENCY FOR TOXIC SUBSTANCES AND DISEASE REGISTRY <https://wwwn.cdc.gov/TSP/MMG/MMGDetails.aspx?mmgid=7&toxid=2> (noting that a single small exposure from which a person recovers quickly is not likely to have long-term effects, and that after a severe exposure, injuries or symptoms may continue to develop for up to 24 hours).



Though some common symptoms of ammonia or chloramine gas poisoning align with our cases, other symptoms seen in our case videos like loss of consciousness or difficulty walking do not.<sup>423</sup> Leg numbness, a symptom reported by state-affiliated media, eyewitnesses, and third parties, is also not a symptom associated with ammonia or chloramine gas exposure.<sup>424</sup> Though state media reports are not necessarily reliable descriptions of girls' symptoms, it is worth noting that their common use of "lethargy" as a symptom is not easily explained by exposure to ammonia or chloramine gas either. In addition, eye irritation – which appears contemporaneously alongside throat irritation in several peer-reviewed research studies examining exposure to ammonia gas – does not appear in most of our cases, casting doubt on ammonia gas as the toxic agent used in our cases.<sup>425</sup> Moreover, ammonia gas (which is a part of chloramine gas) is often recognized by its pungent odor, sometimes compared to the odor of a decaying fish (though like symptoms, the strength of the odor will vary).<sup>426</sup> Only in one of our cases did victims identify this smell.<sup>427</sup> Ammonia gas still presents a possible toxic agent used in our cases, but the inconsistencies make it impossible to assert this with any certainty. Expert analysis of toxicology reports is ultimately needed.

### 3. *Tear Gas or Pepper Spray*

A third possibility that was put forward by the Iranian government's investigation into all reported poisoning incidents across the country during this time is that the toxic agent was tear gas or pepper spray, an agent the Iranian government refers to as a "non-toxic agent."<sup>428</sup> Common symptoms of exposure to tear gas or pepper spray involve skin and eye irritation along with coughing, shortness of breath, headaches and dizziness, or in more severe levels of exposure, even brief loss of consciousness.<sup>429</sup> While some of these symptoms were present in our case videos – coughing, shortness of breath, and apparent loss of consciousness – other symptoms of exposure to tear gas or pepper spray, like eye irritation, were not visible in any of our case file videos (which could have been identified through eye redness, wet eyes and face, or frequent rubbing of eyes), and it was reported in only two of our cases.<sup>430</sup> In addition, exposure

<sup>423</sup> See *Ammonia*, *supra* note 419.

<sup>424</sup> *Id.*

<sup>425</sup> See *Acute Exposure Guideline Levels for Selected Airborne Chemicals: Volume 6*, *supra* note 419 at Table 2-5 (summarizing peer-reviewed research findings on "nondisabling and reversible effects of inhaled ammonia in humans," detailing contemporaneous throat and eye irritation from exposure).

<sup>426</sup> *Id.*

<sup>427</sup> See *Are Iranian Schoolgirls Being Poisoned by Toxic Gas?* BBC NEWS (Mar. 3, 2023) <https://www.bbc.com/news/world-middle-east-64829798> (reporting on "frequent" descriptions of the odor as like "rotten fish").

<sup>428</sup> See *Ministry of Intelligence's explanatory statement regarding school incidents in the country*, ISNA (Apr. 28, 2023).

<sup>429</sup> David Tidwell & Brandon K. Wills, *Tear Gas and Pepper Spray Toxicity*, STATPEARLS (May 14, 2023) <https://www.ncbi.nlm.nih.gov/books/NBK544263/>; see also Leo J. Schep, R.J. Slaughter, and David McBride, *Tear gas or pepper spray: the Tear Gases CN, CS and OC-a Medical Review*, 161 J R ARMY MED CORPS. 94-99 (June 2015) <https://pubmed.ncbi.nlm.nih.gov/24379300/>; M. Yeung & William Tang, *Clinicopathological Effects of Pepper (Oleoresin Capsicum) Spray*, 21 HONG KONG MED J. 542-52 (Nov. 2015) <https://pubmed.ncbi.nlm.nih.gov/26554271/>.

<sup>430</sup> See Claire Sissons, *Effects of Tear Gas on the Body*, MEDICAL NEWS TODAY (July 31, 2020) <https://www.medicalnewstoday.com/articles/effects-of-tear-gas> (detailing tear gas's attraction to moist areas of the body including one's eyes, mouth, throat and lungs). While eye irritation can be a sign of hydrogen sulfide gas exposure as well, eye irritation in the case of hydrogen sulfide is more commonly associated with longer periods of exposure, and does not always appear with shorter periods of exposure as noted above. See *supra* note 406.



to tear gas or pepper spray does not inhibit one's motor functions or cause body numbness, a symptom seen in some of our case videos and reported by eyewitnesses and domestic news outlets, including state-affiliated news. Though it is difficult to rule out the possibility completely, it seems unlikely that our cases exclusively involved tear gas or pepper spray.<sup>431</sup>

#### 4. Nerve Agents

A fourth, but unlikely, possibility is that the toxic agent used was a nerve agent. This theory was suggested by the popular Telegram and citizen reporting channel @1500Tasvir, which claimed to have analyzed hair samples sent from affected schoolchildren, finding evidence of a chemical compound it claimed is common in nerve gases.<sup>432</sup> However, other experts have cast doubt on this theory, noting that unique symptoms common in nerve agent poisonings have not been reported in these cases, including ours.<sup>433</sup> This absence of recognizable nerve agent exposure symptoms, like pinpoint pupils or excessive secretions, make the use of nerve agents in our cases seem unlikely.

#### iii. Conclusion

In sum, hydrogen sulfide appears a plausible possibility for our cases. The symptoms associated with hydrogen sulfide gas poisoning align most closely – out of the four toxic agents examined – with those reported in our cases, including coughing and difficulty breathing, impaired motor skills, vomiting, dizziness, losses of consciousness, headaches, and sleepiness. The variations in odor profiles for hydrogen sulfide gas also align with our cases, in which there were a range of odors reported including rotten and sweet odors, both aligning with different levels of exposure to hydrogen sulfide. However, not all symptoms reported in our cases align with common symptoms of hydrogen sulfide poisoning, such as numbness in legs. This suggests that it may not be solely responsible.

Slightly less strong of a candidate is chloramine gas, or else ammonia gas on its own, as the toxic agent responsible for our cases. Some symptoms align with common symptoms associated with chloramine or ammonia gas exposure, but others do not, like leg numbness, difficulty walking, or loss of consciousness. Tear gas or pepper spray seem unlikely in our cases to be solely responsible given the lack of apparent eye irritation in most of our cases and the presence of motor skill impairment visible in several videos and reported by eyewitnesses and state-affiliated media. Nerve agents also seem unlikely at least in our cases, with no reports for our cases of distinct symptoms of nerve agent exposure such as pinpoint pupils.

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<sup>431</sup> Note that in general reporting on this issue that did not mention our cases specifically, videos were referred to in which girls are heard complaining about tear gas. See *Are Iranian Schoolgirls Being Poisoned by Toxic Gas?* BBC NEWS (Mar. 3, 2023) <https://www.bbc.com/news/world-middle-east-64829798> (“In some videos, girls can be heard complaining about tear gas, which had been widely used during recent anti-government protests”).

<sup>432</sup> @1500Tasvir, TELEGRAM (May 31, 2023) <https://t.me/t1500tasvir/7465> (finding evidence of fluoromethyl phosphate, a compound the group claims is common in nerve gas).

<sup>433</sup> See Michele Catanzaro, *supra* note 417 (detailing chemist Keith Ward's view that nerve agents and mustard gas are unlikely due to their unique symptomatic properties like pinpoint pupil and delayed effects after exposure); see also *Nerve Agent and Organophosphate Poisoning*, U.S. CENTER FOR DISEASE PREVENTION AND CONTROL (detailing common symptoms not seen or reported in our cases such as convulsions and excessive secretions) <https://emergency.cdc.gov/agent/nerve/tsd.asp>.

One possibility, and one that was suggested by Iranian officials and experts at the time, is that the toxic agent was actually a mixture of toxins, and the mixture was not necessarily the same for each case.<sup>434</sup> If that's true, this could explain the variations in reported odors, and might help explain some of the varying symptoms between our cases (for example, not all cases had reports of leg numbness). However, this possibility makes it even more difficult to confirm with any certainty the toxic agents used.

Ultimately, these are preliminary observations, and expert analysis is required to reach any convincing conclusions. Specifically, expert toxicology analyses of representative hair samples from affected girls is critical, along with systematic collection of timely descriptions from affected girls, staff, and teachers about their symptoms and specific odors – including whether the odor changed over time, to allow for comparisons and more robust trend analyses. Collecting descriptions from witnesses about odors or symptoms could also be useful in confirming the reports from those directly affected. Together, these could help establish a more convincing body of evidence to adequately assess the toxic agent used.

## PART II: THE IRANIAN GOVERNMENT'S RESPONSE

Part I detailed thirteen likely poisoning incidents that happened in Iranian schools from December 2022 – April 2023. However, these were far from the only poisoning incidents in schools that were reported throughout Iran during this time. Although the Iranian government never released official statistics about how many school poisoning incidents were reported, we have some indications based on timely reporting by domestic news outlets and non-Iran-based independent sources. By March 1, a domestic media outlet reported that as many as 91 schools had been involved and more than 1,500 students affected.<sup>435</sup> By March 7, the human rights nonprofit Human Rights Activists in Iran (HRANA) reported that at least 103 schools had experienced incidents and 7,060 students affected.<sup>436</sup> By March 13, the state-affiliated news outlet Tasnim reported that a whopping 13,000 students had been affected in an unspecified

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<sup>434</sup> *26 provinces and 245 schools were involved in the poisoning/security forces were unable to find any foreign agents/they covered up the issue*, ROUYDAD24 (Mar. 17, 2023) (quoting a doctor and member of the Parliamentary Working Group investigating the poisonings as saying that a series of chemicals have been identified in blood test results); *The mystery of the unknown gas*, HAM MIHAN (Mar. 4, 2023) (quoting an ICU specialist, who told the news outlet that it appeared to him that the girls were being poisoned by a “combination of gases” that were not easily accessible to the public); see also *New details about the causes of student poisoning*, ISNA (Mar. 6, 2023) (quoting Parliamentary Working Group Member Mohammad Asaferi, who claimed that the toxic agent used varied in different locations).

<sup>435</sup> *Strange instructions to school administrators regarding student poisoning/prevent the news from being published in the media and ensure that no one leaves the school*, ARMANMELI (Mar. 6, 2023). ISNA reported lower numbers, claiming that 50 schools had been poisoned and 350 students affected by March 1. See *Continuing serial student poisoning/this time in Tehran*, ISNA (Mar. 1, 2023).

<sup>436</sup> *Report on the Situation of Women in Iran for International Women's Day*, HRANA (Mar. 7, 2023) <https://www.en-hrana.org/report-on-the-situation-of-women-in-iran-for-international-womens-day/>.

number of incidents at schools across Iran,<sup>437</sup> and on March 17, the reformist news outlet Rouydad24 reported that 245 schools in 26 provinces had experienced poisoning incidents.<sup>438</sup>

While our team did not independently verify each alleged incident, what is apparent is that even to Iranian officials, this was a serious issue affecting hundreds of schools and thousands of students across the country. Thus, what officials did in response to our cases and other reported poisoning incidents is critical to understanding whether Iran met its legal obligations under international human rights law (an issue we examine in depth in Part III). Below, we detail what officials and state-affiliated news outlets said about the poisonings over time, as well as what actions officials took in response to the poisoning incidents. Each Section is further divided between our cases specifically and then the poisoning incidents generally across Iran, with the Section on our cases going more in-depth on specific responses.

## A. Official Reporting and Statements About Poisoning Incidents

In this Section, we detail statements made by government officials and reporting by state-affiliated news media regarding the poisoning incidents, first with respect to our cases and then to the poisoning incidents generally around the country. To capture reporting on our cases, we searched for IRNA, IRIB, ISNA, and Tasnim articles covering each of our cases. We catalogued the searches we used to find these articles in Annex C. The trends in reporting and statements suggest that over time there was a concerted effort to prevent information about the poisonings from reaching the public, to cast doubt on information that did reach the public about the poisonings, and to spread a calculated narrative that attributed the poisonings to mass hysteria instead.

### i. Reporting and Statements About Our Cases

Table 1 provides a summary for government reporting and officials' statements about our cases.

**Table 1. Summary of Government Officials' Statements and State-Affiliated Reporting on Our Cases.**

Cases	Phase 1: Detailed Reporting but Qom Officials' Silence
Dec. 13, 2022: Noor Girls' Vocational School, Qom City, Qom Province	IRIB was on the scene interviewing students and parents. Tasnim, IRNA, and ISNA reported on the incident, saying girls had been "poisoned," but ISNA was the only outlet to continue following up on the issue, interviewing parents, students, and officials for details and explanations. Qom officials remained largely silent, declining to speak to local reporters who were not

<sup>437</sup> *No deaths have been reported so far due to student illness/13,000 students have been discharged and treated*, TASNIM (Mar. 13, 2023).

<sup>438</sup> *26 provinces and 245 schools were involved in the poisoning/Security forces said no trace of foreign agents was found/We covered up the case*, ROUYDAD24 (Mar. 17, 2023). In total, an external researcher documented 448 alleged incidents in 2022 and 2023, although our team has not independently verified each alleged incident. See Mahmoud Azimaei, *Schools' Poison Tracker* <https://sites.google.com/view/poison-tracker/english?authuser=0>.

	affiliated with state-affiliated news outlets and did not allow the reporters to gather information at the school, and failing to provide ISNA reporters with an explanation.
	<b>Phase 2: Initial Outcry Followed by Downplaying of Symptoms, Faulty Explanations, and Limiting Information</b>
Feb. 25, 2023: Ahmadiyya Girls' High School, Borujerd, Lorestan Province	Tasnim, IRNA, and ISNA all reported on this incident and referred to it as a "poisoning." There were many responses from local, regional, and national officials who called these and other incidents "intentional" and aimed at closing girls' schools. Yet in the days that followed, the story began to change. Officials began downplaying girls' symptoms, claiming the vast majority were sent to the hospital due to stress, and avoiding sharing any information with journalists or the public. Meanwhile, state-affiliated news published stories containing different unsubstantiated allegations for what the source of the gas was (Nitrogen gas) or what caused the incident (the same oil tanker that caused the incident in Pardis on Feb. 28).
Feb. 26, 2023: 15 Khordad Girls' High School, Borujerd, Lorestan Province	(same)
Feb. 28, 2023: Khayyam Girls' High School, Pardis, Tehran Province	ISNA, IRNA, and Tasnim all reported that it was a "poisoning." Local officials and IRNA warned citizens against sharing multimedia of the incident, saying that the "security establishment" would deal with anyone "caught spreading rumors," and the mayor of Pardis announced that two people were caught filming the incident and sending them to "hostile networks" and were summoned by the security services.
Mar. 1, 2023: 13 Aban Girls' Middle School, Tehranasar, Tehran Province	ISNA reported on the incident, calling it a "poisoning." IRNA did not report on it, and Tasnim simply pointed to another official who stated it was a "poisoning," then proceeded to publish a second article that cast doubt on the entire incident and suggested that protesters on the scene had simply made it up. Reporters claimed to have been prevented by authorities from conducting interviews with affected students and their families.
Mar. 5, 2023: Hazarat Zeyneb Girls' High School, Ramhormoz, Khouzestan Province	ISNA called the incident a "poisoning," the IRIB said girls were taken to the hospital with vague descriptions of symptoms including "lethargy" and "shortness of breath." Tasnim and IRNA reported on the cases across Khouzestan but not this case specifically. Tasnim referred to the series of incidents that occurred on Mar. 4 and 5 in Khouzestan as "mass poisoning incidents." Officials contradicted themselves about what happened, with the Provincial Governor of Khouzestan overriding the mayor of Rahmormoz's description of the cause, which he attributed to a white powder substance in front of the school.



	<b>Phase 3: Minimal to No Reporting and Attributing Symptoms to Psychological Causes</b>
Apr. 8, 2023: Sema Girls' High School, Ardebil City, Ardebil Province	No Tasnim or IRNA articles, despite IRNA having reported on an incident at this school a month earlier, referring to it as one of the “mass poisonings” targeting female students. ISNA did report on this incident but downplayed it, using the phrase “students who felt poisoned” and explaining that the students’ symptoms were caused by “stress, anxiety, and fear.” In another article, ISNA published a quote from a local official who said that girls were “poisoned” but also said that most students’ symptoms were caused by anxiety and fear. IRIB reported on this case as well, but similarly emphasized that students’ symptoms were caused by anxiety and fear.
Apr. 9, 2023: Ma’raj Girls’ High School, Saqqez, Kurdistan Province	No IRNA, ISNA, or Tasnim articles covered this incident. The Secretariat of the local Press Supervision Board was reported to have ordered local news organizations not to report on any poisoning incidents because such reporting can cause societal unrest and may rely on local officials who are unauthorized to speak about these cases. This suggests that government officials were trying to limit and streamline public information about these incidents. No official authority made a statement about this case, but the national Coordinating Council of Trade Unions released a statement calling these incidents “systematic and coordinated” and called government officials “intentionally negligent” for failing to identify the cause of the poisonings and find their perpetrators.
Apr. 10, 2023: Sadr Girls’ High School, Karaj, Alborz Province	IRNA, ISNA, and Tasnim were silent, despite the fact that all three reported on other poisoning incidents that happened in Karaj in early March. Mehr, another state-affiliated news outlet we did not track, did report on this case, but only to provide an alternative explanation that did not align with the video evidence we found.
Apr. 11, 2023: Four cases in Shahinshahr and Isfahan City, Isfahan Province	ISNA and Tasnim reported on the incidents following videos that went viral on social media capturing the incidents. Yet they were careful to avoid referring to them as “poisoning” incidents, as were the few officials who commented. Local government agencies refused to publish information about the incidents, and unnamed officials interviewed by ISNA were reported to have blamed the incidents in Isfahan on mass hysteria, claiming that girls are more sensitive. In the following days, IRNA and Tasnim published dubious explanations for these incidents.

While one cannot draw sweeping conclusions from public reporting and statements alone, there are three noticeable phases in official reporting and government officials’ public responses to our cases that highlight trends in the government’s response to these incidents.

During the initial phase of reporting and reactions, from November 30, 2022 – December 31, 2022, during which our first case occurred (on December 13, 2022), state-affiliated news media outlets appeared to publish detailed reporting on the incident and referred to it as a “poisoning.”<sup>439</sup> However, Qom officials largely remained silent, and were reported to refuse to speak with ISNA and to have blocked non-state-affiliated media journalists from gathering information at the scene.<sup>440</sup> In the days following, ISNA claimed that “despite extensive efforts,” the news agency was unable to get an explanation or further information from officials.<sup>441</sup> IRNA and Tasnim did not publish any follow-up reporting about the incident for the rest of the month.

During the next phase, from January 1, 2023 – March 20, 2023 (the end of the Persian year), state-affiliated news media reported on the incidents when they occurred, referring to the incidents as “poisonings,” or, as one Tasnim article put it on March 5, 2023, “mass poisoning incidents.”<sup>442</sup> Many officials during this time, unlike in Qom, publicly denounced the incidents, with several calling them “intentional” and aimed at closing girls’ schools.<sup>443</sup> However, during this phase, the girls’ symptoms were often qualified with statements that stressed the lack of seriousness of their symptoms, and reporting often used generic words like “lethargy” or “shortness of breath,” possibly in an effort to downplay the girls’ symptoms or to provide room for speculation that the girls’ symptoms were psychological.<sup>444</sup> In the days after the incidents that occurred during this phase, follow-up reporting and statements on details contradicted prior

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<sup>439</sup> *Poisoning of 51 students at Noor Technical School in Qom / Patients to be discharged within a few hours*, TASNIM (Dec. 13, 2022) (Doc. 287\_12) (reporting initial clinical assessments carried out by hospital staff show the girls had been “poisoned”); Doc. 287\_18 (ISNA reporting that students were transferred to the hospital with “symptoms of poisoning,” and the cause of the “poisoning” is unknown); *Most of the poisoned schoolgirls in Qom have been discharged from the hospital*, IRNA (Dec. 13, 2022) (Doc. 287\_22) (reporting that students had suffered from an “inhalation poisoning incident”).

<sup>440</sup> *Repeated poisoning of students at a girls’ vocational school in Qom*, QOMNA NEWS (Dec. 13, 2022) (Doc. 287\_08); @ManotoNews, X (Dec. 13, 2022) <https://x.com/ManotoNews/status/1602644763014201345> (Doc. 287\_02).

<sup>441</sup> *What did the poisoned students from Qom say about the repeated incident at Noor Technical School?*, ISNA (Dec. 15, 2022) (Doc. 287\_16).

<sup>442</sup> *Mass poisoning of students in Khuzestan + video of the latest condition of the patients*, TASNIM (Mar. 5, 2023) (Doc. 184\_28).

<sup>443</sup> See *supra* Part I (detailing officials’ reactions to the incidents in Pardis and Borujerd, after which officials called the incidents “intentional” and aimed at closing girls’ schools).

<sup>444</sup> See, e.g., *Poisoning of students in some schools in Ardabil*, ISNA (Apr. 8, 2023) (Doc. 40\_27); *Poisoning of 115 female students in Ramhormoz*, ISNA (Mar. 5, 2023) (Doc. 184\_10); *More than 60 critically ill students in Ramhormoz were sent to medical centers*, IRIB (Mar. 5, 2023) (Doc. 184\_22); *An account from one of the students about the serial poisonings at Ahmadiyeh School in Borujerd*, TASNIM (Feb. 25, 2023) (Doc. 255\_10); *Poisoning of 15 Khordad Borujerd students / Most of the students have been discharged*, ISNA (Feb. 26, 2023) (Doc. 257\_05); *The cause of the poisoning of students at Khayyam School in Pardis has been identified*, MEHR (Mar. 2, 2023) (Doc. 357\_21); see also *Suspected Poisonings Continue; Hengaw: Some Principals in Baneh Asked Students to Stay at Home*, Radio Farda (Apr. 11, 2023) <https://www.radiofarda.com/a/iran-school-poisoning-continues/32358701.html> (reporting on the state’s announcement banning reporting on incidents of chemical attacks against schools and describing a seemingly unified reporting message by state media in prior days, using words like “lethargy”).

information<sup>445</sup> and downplayed the severity of girls' symptoms,<sup>446</sup> and in one case, cast doubt on whether the incident happened at all.<sup>447</sup> Local officials simultaneously tried to limit the spread of information beyond official networks, stressing to the public the importance of only using "official" news outlets to obtain information,<sup>448</sup> warning that the "security establishment" would deal with anyone caught sending videos of incidents to "hostile networks,"<sup>449</sup> and preventing reporters from interviewing affected students and their families.<sup>450</sup> Meanwhile, with respect to Qom, officials did begin releasing some information about alleged findings from investigations, but that information was limited and inconsistent, and parents, students, and news outlets alike grew increasingly frustrated with the lack of answers.<sup>451</sup> Leading Qom religious officials also

<sup>445</sup> For example, in the two Borujerd cases, the spokesperson for the Ministry of Health, Treatment, and Medical Education said on February 26 said that the incidents in Borujerd simply caused by carbon monoxide gas and had "nothing to do with the recent poisonings in Qom," despite prior evidence to the contrary. *The reason behind the poisoning of students in Borujerd requires investigation by specialized teams*, IRNA (Feb. 26, 2023) (Doc. 255\_15); see also *supra* Part I for a detailed explanation of evidence against this assertion. In the Khayyam Girls' High School case in Pardis, a range of odors were reported by affected students, but officials appeared to replace these odor reports with their own assertions that it smelled like gas. See, e.g., *Investigation into the cause of the poisoning of students at Khayyam School*, IRIB (Mar. 1, 2023) (Doc. 357\_14) (video report in which a reporter interviewing several students asks, "it smelled like gas right?" and the student responded, "yes, gas," in what appears to have been a staged attempt to reshape the narrative, and later, in the same interview, another girl tells the reporter that she "can't name what it smelled like," casting doubt that the odor was actually gas). And in the Hazarat Zeyneb case in Ramhormoz, Khuzestan, the mayor and the Provincial Governor contradicted each other about whether a powder-like substance caused the incident. See *Ramhormoz County Governor: The general condition of the poisoned students is good*, AKHARIN KHABAR (Mar. 5, 2023) (Doc. 184\_25) (mayor claimed the incident was caused by a powder-like substance left in front of the school doors); but see *Poisoning of 115 female students in Ramhormoz*, ISNA (Mar. 5, 2023) (Doc. 184\_10) (Provincial Governor denying this was the cause).

<sup>446</sup> For example, following the two incidents in Borujerd, Deputy Governor of Lorestan Province Majid Monemi claimed that all girls remaining in the hospital were there simply due to "stress," *Remarks by the Deputy Governor of Lorestan Province regarding the news reports about schools in Borujerd*, IRNA (Feb. 26, 2023) (Doc. 255\_20), and Reza Ezzati, Director General of the Education Department of Lorestan Province, told state-affiliated news that all students who experienced poisoning in the last few days are in good condition, all schools are open and activities normal. *The ongoing series of student poisonings — In which provinces has the issue been confirmed?* MEHR (Mar. 1, 2023) (Doc. 257\_30); see also *The poisoned students of Borujerd are in full health*, TASNIM (Feb. 28, 2023) (Doc. 257\_33) (reporting that two days after the 15 Khordad School's incident, students were in "perfect health"). In Ramhormoz, Tasnim downplayed girls' symptoms the same day the incident occurred, reporting that girls' symptoms were mostly due to "anxiety or stress." *Mass poisoning of students in Khuzestan + video of the latest condition of the patients*, TASNIM (Mar. 5, 2023) (Doc. 184\_28).

<sup>447</sup> For example, after initially publishing a quote from a local official that girls had been "poisoned" at 13 Aban in Tehran, Tehran, *Transfer of 4 students to the hospital in today's poisoning incident at Tehran schools*, TASNIM (Mar. 1, 2023) (Doc. 359\_36). Tasnim published a follow-up piece casting doubt on the entire incident, claiming that their reporter saw "no ambulance and no students experiencing poisoning," and suggested that protesters at the scene had simply made it up. *Tasnim reporter's account from in front of a school in Tehran's Tehran's neighborhood / The complex mystery of student poisonings*, TASNIM (Mar. 1, 2023) (Doc. 359\_29).

<sup>448</sup> See, e.g., *Pardis County Governor: 35 poisoned students have been discharged from the hospital*, IRNA (Mar. 1, 2023) (Doc. 357\_22) (encouraging people to only use official information sources and warning that the "security establishment" would deal with anyone caught spreading rumors); *Repeat poisoning of Borujerd students, this time at the 15 Khordad High School*, MEHR (Feb. 26, 2023) (Doc. 257\_25) (Deputy Governor of Lorestan Province Majid Monemi encouraging people to listen only to "official" sources of information about the poisonings).

<sup>449</sup> *Pardis County Governor: 35 poisoned students have been discharged from the hospital*, IRNA (Mar. 1, 2023) (Doc. 357\_22).

<sup>450</sup> *Field report by a student journalist on the latest condition of the poisoned students of Shohada-ye 13 Aban School + video*, STUDENT NEWS NETWORK (Mar. 1, 2023) (Doc. 359\_09).

<sup>451</sup> See, e.g., *Poisoning Incident "From Anxiety and Delusions to Lack of Work" / Briefing Sessions for Teachers to Be Held*, ISNA (Mar. 4, 2023) (criticizing local officials for denying incidents and explaining that what families and

spoke out, using their social media profiles to urge national authorities to address ongoing security concerns at schools and advising them against eroding the public's trust with unclear and dishonest communications.<sup>452</sup>

In the third phase, from March 21, 2023 – May 31, 2023, officials and government news outlets largely refused to publish any information about the poisoning incidents at all, despite having previously reported on incidents that occurred in some of the same cities a month earlier.<sup>453</sup> When these media sources did publish stories about the incidents, they sought to provide alternative explanations for what happened and downplayed the incidents, focusing on girls' alleged panic or stress causing the incidents and using phrases like "the students felt poisoned."<sup>454</sup> In its reporting on our case in Karaj, Alborz Province, for example, Mehr<sup>455</sup> alleged that the incident happened because a nearby transformer caught fire and the students panicked, and that no one actually went to the hospital.<sup>456</sup> And in interviews with ISNA, Isfahan officials were reported to have claimed that female students are more sensitive and that the poisonings were actually caused by their "mass hysteria."<sup>457</sup> In addition, perhaps tellingly, in Saqqez, a local journalist reported that the Secretariat of the Press Supervision Board had ordered local news organizations to not report on incidents because reporting on them could cause societal unrest and may refer to officials who are not authorized to speak about the incidents.<sup>458</sup>

In sum, the trends from each phase suggest that while officials and government-affiliated news outlets initially reported or commented on the incidents when they happened (other than in Qom, where officials were largely silent), they often failed to share meaningful follow-up information, contradicted or downplayed initial reporting, and frequently referred to psychological factors as causes of the incidents. By April 2023, the news outlets and officials largely refused to publicize any information on poisoning incidents at all, pointing instead to psychological causes of the girls' symptoms. The third phase marks a clear shift from the first and second phase, with officials and state-affiliated news outlets largely refusing to report publicly on the poisonings at all. The chronology suggests that officials behind the scenes were tamping down on public information about these incidents and homing in on an alternative explanation for the reported incidents: that they were caused by girls' anxiety and mass hysteria.

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students are angry about in Qom is "the lack of proper information and clarification about the events that have occurred"); *What is the cause of the suspicious serial poisonings of students?! A "tangerine-like smell" is emitted during poisoning!*, Tasnim (Feb. 13, 2023) (Doc. 287\_23) (Tasnim asks "has the passage of more than two months since the first poisoning incident not been enough time to investigate the ... issue and inform concerned parents?").

<sup>452</sup> See, e.g., @ayatollahjavadiamoli, INSTAGRAM (Mar. 2, 2023) <https://www.instagram.com/p/CpSGv4ooAeE/>.

<sup>453</sup> For example, in our April 8 case in Ardebil, Ardebil Province, neither Tasnim nor IRNA reported on it or other cases that were reported in Ardebil around this time. ISNA did report on the incidents but was careful not to make any conjectures itself, either relying on local officials or claiming the girls "felt" poisoned. In both our April 9 case in Saqqez, Kurdistan Province, and in our April 10 case in Karaj, Alborz Province, ISNA, IRNA, and Tasnim were all silent.

<sup>454</sup> See, e.g., Doc. 40\_35.

<sup>455</sup> Mehr is another state-affiliated media outlet. We did not specifically look for articles published by Mehr, but we found this article through alternative searches about this case.

<sup>456</sup> *Denial of the rumor about student poisoning at Sadr School in Karaj*, MEHR (Apr. 11, 2023) (Doc. 08\_04).

<sup>457</sup> *What was the cause of the student poisoning in Shahinshahr?* ISNA (Apr. 15, 2023) (Doc. 143\_27).

<sup>458</sup> Citizen Journalist, *Anger over Saqqez School Poisonings Triggers more Security, Censorship*, IRAN WIRE (Apr. 10, 2023) (Doc. 220\_30).



## ii. Reporting and Statements About Nation-Wide Poisoning Incidents

We reviewed several hundred articles published by IRIB, IRNA, ISNA, and Tasnim about the poisonings nationally, and supplemented this research with additional domestic reporting capturing government officials' statements. Note that this review of reporting and statements about nation-wide poisoning incidents is not intended to be comprehensive; instead, we intend merely to highlight trends we noticed in the articles we reviewed. In general, we noticed that officials and the state-affiliated news media outlets we tracked shifted from treating these incidents as intentional and demanding more information, to accusing the media of sowing public panic and attributing the incidents to girls' stress. By the end, government officials and state media mostly refused to comment or report on the incidents at all. It suggests that there was a concerted effort to dismiss the poisoning incidents and spread an alternative narrative to the public. Each phase is summarized below.

Phase 1 (November 30, 2022 – December 31, 2022): During this first phase the first two poisoning incidents were reported, both at Noor Girls' Conservatory School in Qom. State-affiliated media outlets other than ISNA published limited reporting on the first incident; it is unclear whether this was a deliberate attempt to keep information from reaching the public or simply because official sources did not take the incident seriously. ISNA, on the other hand, published extensive reporting on it, announcing the incident had occurred<sup>459</sup> and then conducting detailed follow-up reporting about the students' status and about officials' explanations.<sup>460</sup> In its reporting, ISNA found that some of the affected girls continued to experience serious symptoms, including numbness in their legs and difficulty walking.<sup>461</sup> Officials confirmed a poisoning had occurred<sup>462</sup> but contradicted ISNA's follow-up reporting on the girls' continued symptoms, insisting instead that the girls' statements were false and that the girls were simply experiencing muscle cramps from stress.<sup>463</sup> Meanwhile, Tasnim urged everyone to "ignore rumors" about this incident and wait until official test results were released.<sup>464</sup>

But the test results were never released, and by the time the second incident at Noor occurred, IRNA, IRIB, and Tasnim seemed to change their approaches, reporting on the incident when it happened<sup>465</sup> and referring to it as a case of "respiratory poisoning."<sup>466</sup> ISNA continued the type

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<sup>459</sup> *18 students were poisoned in Qom; All of them are fine*, ISNA (Nov. 30, 2022).

<sup>460</sup> *The latest status of the poisoned students of Qom/The Provincial Department of Education is following up on the matter*, ISNA (Dec. 3, 2022); *We are still waiting for the results of the toxicology tests on the poisoned students*, ISNA (Dec. 4, 2022); *Cause of students' poisoning to be determined by Friday*, ISNA (Dec. 5, 2022).

<sup>461</sup> *The latest status of the poisoned students of Qom/The Provincial Education Department is following up on the matter*, ISNA (Dec. 3, 2022).

<sup>462</sup> *18 students were poisoned in Qom; All of them are fine*, ISNA (Nov. 30, 2022).

<sup>463</sup> *The latest status of the poisoned students of Qom/The Provincial Education Department is following up on the matter*, ISNA (Dec. 3, 2022).

<sup>464</sup> *Denial of rumors about the cause of the poisoning of Qom students*, TASNIM (Dec. 3, 2022).

<sup>465</sup> See, e.g., *Most of the poisoned female students in Qom have been discharged from the hospital*, IRNA (Dec. 13, 2022); *Most of the students affected by the poisoning at Noor Vocational School in Qom have been discharged from the hospital*, IRIB (Dec. 13, 2022); *51 students poisoned at Noor Conservatory in Qom/patients to be discharged in a few hours*, TASNIM (Dec. 13, 2022); also *Noor Qom Conservatory students were poisoned again; This time 51 people*, ISNA (Dec. 13, 2022).

<sup>466</sup> See, e.g., *51 students poisoned at Noor Conservatory in Qom/patients to be discharged in a few hours*, TASNIM (Dec. 13, 2022) (reporting on the second incident at Noor girls' school, saying that girls had symptoms of respiratory poisoning); *Most of the students affected by poisoning at Noor Vocational School in Qom have been*

of reporting it had published regarding the first incident at Noor, reporting on the incident as it happened<sup>467</sup> and then publishing detailed follow-up reporting.<sup>468</sup> Officials during this time largely maintained their silence and gave scant details to the public, instead urging families to remain calm.<sup>469</sup> Their motivation is unclear; as one ISNA article speculates, why did officials reopen schools after the first incident if they did not yet know the cause?<sup>470</sup> Or if they had deliberately concealed information from the public, why had they not at least acted on this knowledge to prevent the second incident from happening?<sup>471</sup> These questions were never answered, and after December 16, all four state-affiliated media outlets stopped reporting on the incidents in Qom, and no follow-up information was provided by officials for the rest of December.

Phase 2 (January 1, 2023 – March 20, 2023<sup>472</sup>): During Phase 2, as the number of reported incidents ballooned across the country, state-affiliated news outlets published thousands of articles about the poisonings<sup>473</sup> and government officials commented frequently about them.<sup>474</sup> In the midst of this “confusing tangle,”<sup>475</sup> as Tasnim referred to it, there were two overarching trends in reporting and officials’ statements during this period. Both trends indicate shifts away from concrete information about the poisonings and onto a preoccupation with fear and anxiety, both in society at large and among the girls. Interestingly, both of these shifts appear to have been foreshadowed by Qom officials, who were the first officials we found to blame the media

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*discharged from the hospital*, IRIB (Dec. 13, 2022) (reporting that according to doctors, the girls’ conditions were “similar to respiratory poisoning”); *Explanations from the Minister of Education of Qom Regarding the Poisoning of 51 Female Students in This Province*, IRNA (Dec. 13, 2022) (reporting on the second incident, saying that 51 students had symptoms of “respiratory poisoning”).

<sup>467</sup> *Noor Qom Conservatory students were poisoned again; This time 51 people*, ISNA (Dec. 13, 2022).

<sup>468</sup> *What Did the Poisoned Qomi Students Say About the Repeated Incident of Noor Academy?*, ISNA (Dec. 15, 2022); *The Authorities Should Tell the Reason for the Poisoning, but no Serious Problem Has Occurred for the Students*, ISNA (Dec. 16, 2022).

<sup>469</sup> See, e.g., *What Did the Poisoned Qomi Students Say About the Repeated Incident of Noor Academy?*, ISNA (Dec. 15, 2022) (explaining that “despite the extensive efforts of ISNA journalists in Qom to get answers from ... officials ... [the journalists] have not yet heard a detailed answer from these officials ... [about] the causes of two repeated incidents”); *The Authorities Should Tell the Reason for the Poisoning, but no Serious Problem Has Occurred for the Students*, ISNA (Dec. 16, 2022) (reporting that Deputy Medical Director of Qom said that “the nature and name of this gas has not been found yet ... the cause of this incident is still unknown ... but we assume that it is an inhaled gas”); *Qom Education Officials Visit Poisoned Students from Noor Conservatory*, PANA NEWS (Dec. 15, 2022) (reporting a visit to poisoned students from local education officials, who assured parents that authorities were working to identify the cause, but emphasized the need for “a calm atmosphere”).

<sup>470</sup> *The Authorities Should Tell the Reason for the Poisoning, but no Serious Problem Has Occurred for the Students*, ISNA (Dec. 16, 2022).

<sup>471</sup> *Id.*

<sup>472</sup> This marks the end of the Persian calendar year.

<sup>473</sup> *IRNA Data Mining on Student Poisoning in Media and Social Networks*, IRNA (Mar. 9, 2023) (reporting that 4,736 news articles, photos, and reports related to the poisoning incidents were published between December and March, and the peak was on February 25, during which 3,179 items were published in traditional media on that day).

<sup>474</sup> This was likely due at least in part to the fact that the number of reported incidents ballooned during this time. On February 13, Tasnim reported that 12 schools and 200 students had been affected. Yet by March 13, a month later, Tasnim reported that a whopping 13,000 students had been injured in an unspecified number of poisoning incidents around the country. See *What is the cause of the suspicious serial poisonings of students?!/ A "tangerine-like smell" is emitted during poisoning!*, TASNIM (Feb. 13, 2023); *No deaths have been reported so far due to student illness/13,000 students have been discharged and treated*, TASNIM (Mar. 13, 2023).

<sup>475</sup> *The Confusing Tangle of the Poisoning of Qom Students/An Incident Whose Cause is Not Known After 70 Days*, TASNIM (Feb. 9, 2023).

and attribute the incidents to girls' anxiety rather than to poisoning, weeks before these narratives took hold nationally.<sup>476</sup> The fact that the shifting pattern of state responses exhibited after the attack at the Noor Girls' Conservatory School in Qom was mirrored in subsequent cases suggests that these shifts were intentional and pre-planned, rather than simply driven by new information or evidence.

First, in mid-to-late February 2023, state-affiliated news outlets published several articles admonishing officials for failing to provide clear and convincing explanations to the public.<sup>477</sup> In early March, several officials began speaking out too, calling for "accurate reports and convincing answers" from those responsible,<sup>478</sup> as did religious leaders.<sup>479</sup> But then, in early

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<sup>476</sup> See [\*Scientific figures and equipment from the country were mobilized to discover the cause of the Qom school incident\*](#), IRNA (Feb. 16, 2023) (interviewing an official from Qom's PR Department who asserted that "hostile media ... is producing content that is completely untrue, with the aim of disrupting the peace of mind and threatening the mental health of students and parents," and because of this "abuse of foreign media, we needed a change in the information process"); [\*The latest status of the poisoned students in Qom/The Provincial Education Department is following up on the matter\*](#), ISNA (Dec. 3, 2022) (attributing girls' long-lasting numbness in legs and difficulty walking to the "stress" of the situation); [\*Stress caused 18 Qomi students to be sent to hospital/3 students suffered from gas poisoning\*](#), IRNA (Feb. 5, 2023) (Qom officials claiming the incident on February 5 was "stress caused by the possibility of poisoning"); [\*Continuing series on student poisoning in Qom/What was the story of poisoning in 4 other schools?\*](#) TASNIM (Feb. 6, 2023) (Qom officials telling Tasnim reporters that "the students' physical weakness was mostly due to stress from previous poisoning incidents in schools and the chaotic school environment"). Other news outlets similarly viewed Qom officials' behavior as suspicious. See, e.g., [\*Poisonings that are found to be intentional\*](#), ETEMAD DAILY (reprinted in Akharin Akbar) (Feb. 28, 2023) (describing how Qom officials initially treated the poisonings as a security issue but then attributed them to anxiety, which the reporter found suspicious). Importantly, not all Qom officials attributed the incidents to anxiety. For example, on March 1, the President of Qom University Medical Sciences announced that "there is no doubt that poisoning occurred." See [\*Continuing series on student poisoning/this time in Tehran\*](#), ISNA (Mar. 1, 2023).

<sup>477</sup> See, e.g., [\*What is the cause of the suspicious serial poisonings of students?!/ A "tangerine-like smell" is emitted during poisoning!\*](#), TASNIM (Feb. 13, 2023) (questioning officials' explanations for what had happened and asking whether two months had not been enough time to investigate the issue and explain to concerned parents what was going on); [\*Poisoning of students in Tehran and Qom/Parents gathered in front of the Qom Governor's Office\*](#), TASNIM (Feb. 14, 2023) (casting doubt on officials' explanation for an incident that occurred in Tehran); [\*The Confusing Tangle of the Poisoning of Qom Students/An Incident Whose Cause is Not Known After 70 Days\*](#), TASNIM (Feb. 9, 2023) (admonishing officials for failing to clarify the cause of the incidents in Qom); [\*Poisoning of Students in Schools/Family Concerns and Strange Silence from Responsible Agencies\*](#), TASNIM (Feb. 28, 2023) (blaming officials' lack of clear information to the public for the ongoing chaos, writing that none of the relevant officials have "spoken openly and transparently"); [\*Poisoning Incident "From Anxiety and Delusions to Lack of Work" / Briefing Sessions for Teachers to Be Held\*](#), ISNA (Mar. 4, 2023) (criticizing local officials for denying incidents and explaining that what families and students are angry about is "the lack of proper information and clarification about the events that have occurred").

<sup>478</sup> [\*The Causes and Perpetrators of Student Poisoning Should Be Introduced to the Public\*](#), ISNA (Mar. 1, 2023) (quoting MP for Tehran Mohsen Pirhadi); see also [\*Mohammadiari: There Should Be Transparency About Poisoning of Students in Schools\*](#), ISNA (Mar. 3, 2023) (quoting MP for Talesh and Rezvanshahr Hassan Mohammadiari in a speech to Parliament in which he urged officials to "give [the public] a convincing answer as to what the solution [...] is"); [\*Security Officials Should Clarify the Dimensions of the Student Poisoning Incident\*](#), IRNA (Mar. 3, 2023) (quoting Ayatollah Qurban Ali Dari of Najafabadi who said that officials needed to "keep people informed about the details of the incidents," because the "lack of timely information" and authorities' failure to convince the public about what happened has caused "public dissatisfaction"); [\*Officials Should Get to the Root of the School Poisoning Issues/People Should Not Enter the Risky Foreign Exchange Market\*](#), ISNA (Mar. 3, 2023) (referring to a statement by Grand Ayatollah Jafar Sobhani, who called for "accurate information" about the poisonings).

<sup>479</sup> See, e.g., [\*Ayatollah Dori Najafabadi: Security agencies must clarify the dimensions of the student poisoning incidents\*](#), SHAFQA (Mar. 3, 2023) (Ayatollah calling for more public information and for security and law enforcement agencies to "seriously engage" with the issue of poisonings); [\*Video / Ayatollah Alavi Boroujerdi:\*](#)

March, there was a clear shift. Instead of blaming officials for failing to provide clear information to the public, state-affiliated news media began blaming other media outlets for causing panic instead,<sup>480</sup> with a particular focus on foreign media.<sup>481</sup> Officials, too, began pointing their fingers at the media,<sup>482</sup> including foreign media,<sup>483</sup> as the root of the issue, and much less attention was given to the lack of clear, tangible details being offered to the public about the poisoning incidents. This shift can also be seen in reporting about poisoning incidents during this time. Many of the articles published by IRNA, Tasnim, and IRIB about new poisoning incidents included quotes from local officials urging parents and students to “ignore rumors” and only look to official sources for news.<sup>484</sup> While it is not always clear which rumors

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*Contradictory Statements from Officials About Student Poisonings Increase Public Distrust*, SHAFQA (Feb. 26, 2023) (criticizing officials for making contradictory statements, which increases public distrust); *Tehran Friday Prayer Leader: Those Responsible for the Student Poisonings Must Be Dealt with Firmly / The Issue Must Be Clarified to Reassure Students and Parents*, SHAFQA (Mar. 3, 2023) (Tehran Friday prayer leader calling on officials to clarify the cause of the incidents); *Qom Friday Prayer Leader: “Seriousness” in Identifying Those Responsible for Student Poisonings and “Timely Information” Are Public Demands*, SHAFQA (Mar. 10, 2023) (Friday prayer leader in Qom explaining that the public demands a “serious effort” in identifying those responsible for the student poisonings and the cause of them, along with swift prosecution for those responsible).

<sup>480</sup> See, e.g., *President announces authority to investigate student poisoning*, TASNIM (Mar. 1, 2023) (explaining that “a large part of this issue has resulted from a negative psychological atmosphere, and the media should be more attune to this risk”); *How can “general hysteria” cause or exacerbate symptoms similar to poisoning?*, TASNIM (Mar. 4, 2023) (blaming the “widespread dissemination of news about the poisonings” by “hostile media and some social networks” for causing “public hysteria” about this issue); *An analysis of media approaches to the student poisoning scandal: “Inverted Horseshoe Pursuit.”* IRNA (Mar. 6, 2023) (blaming certain domestic and foreign news outlets for the current situation and claiming they were seeking to “assassinate” the regime’s reputation); *From distress to poisoning and fabricating deaths in cyberspace*, IRIB (Mar. 9, 2023) (claiming that the “freedom of cyberspace in Iran” had created the opportunity for “lies, slander, and incitement” regarding student poisonings and these were trying to disrupt public security).

<sup>481</sup> See, e.g., *Why do hostile media insist on using the term “chemical attack” on girls’ schools?* ISNA (Mar. 5, 2023) (arguing that “hostile” Persian-language media outlets were falsely alleging that a large number of female students were being targeted in “chemical attacks”); *An analysis of media approaches to the student poisoning scandal: “Inverted Horseshoe Pursuit.”* IRNA (Mar. 6, 2023) (accusing domestic and foreign media outlets of fueling panic about the poisonings, and calling out by name “Deutsche Welle Persian,” “Radia Farda,” “Al-Arabiya Persian,” “Radio Zamaneh,” “BBC Persian,” “Independent Persian,” and “Iran International”).

<sup>482</sup> See, e.g., *Sardar Jalali: Poisonings are caused by direct intervention of the current of hypocrisy and hostility*, ISNA (Mar. 5, 2023) (reporting that Gholamreza Jalali, the head of the national passive defense organization, accused the media of fueling “social panic” about the poisonings); *The psychological and media climate regarding poisoning must be managed rationally*, IRNA (Mar. 6, 2023) (quoting the Minister of Education who stressed that “there are media concerns about the issue of student poisoning, and this psychological atmosphere must be managed rationally”).

<sup>483</sup> See, e.g., *Vahidi: No one has been arrested in connection with the poisoning of students/Security forces are busy searching for clues*, TASNIM (Mar. 1, 2023) (quoting Ahmad Vahidi, the Minister of Interior, who said that “foreign media” was “playing with the souls of our beloved families and children”); *Ministry of Interior Statement on the Issue of Student Poisoning/Discovery of Suspicious Samples*, ISNA (Mar. 3, 2023) (urging people to ignore “media terrorism of the enemies” and only seek official information); *Rezazadeh: The main causes of student poisoning will be introduced in the next few days/School principals should be vigilant*, ISNA (Mar. 7, 2023) (quoting Yaqoub Rezazadeh, a member of the Parliamentary National Security and Foreign Policy Commission, as saying that “foreign media such as the BBC, Iran International, and the Voice of America, are somehow fueling the issue and are definitely behind the issue” of student poisonings); *Mass media should explain the story of the girls’ poisoning*, ISNA (Mar. 10, 2023) (referring to a statement by the Secretariat of the Supreme Council of the Cultural Revolution, which blamed foreign media for stirring up unrest and warning that “we must be careful of the enemy’s atmosphere creation”).

<sup>484</sup> See, e.g., *Students’ families should remain calm and avoid paying attention to rumors*, IRNA (Mar. 5, 2023) (reporting on an incident in Ilam Province but in the article emphasizing that “the important thing is for families to



parents and students were supposed to ignore, what is clear is that officials at the time were growing increasingly concerned about information related to the poisonings spreading beyond officials and state media apparatuses.<sup>485</sup> It was almost as if the news media and government officials, realizing that they either had no substantive information to share or that any authentic information they possessed about the incidents could be harmful to the government, focused their efforts instead on diminishing media reporting and blaming the media for stirring up people's concerns about the poisonings. Nor were the information restrictions merely rhetorical: the regime arrested and indicted several individuals and domestic news outlets for publishing information about the poisonings.<sup>486</sup>

Second, by late February 2023, many national officials were calling the incidents “intentional” acts,<sup>487</sup> with some even speculating that the perpetrators were trying to close girls’ schools.<sup>488</sup> Yet following a statement by Interior Minister Ahmad Vahidi, who on March 1 alleged that more than 90% of students were not poisoned but were simply stressed,<sup>489</sup> other high-ranking security officials made similar assertions,<sup>490</sup> with very little evidence provided from the incidents

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control and manage their own and their children’s peace” and encouraged families not to worry and ignore rumors); *What was the story of the poisoning of students at Payam Shahed School in Isfahan?* TASNIM (Mar. 5, 2023) (urging parents and students to “avoid paying attention false news and rumors that are being spread with the aim of causing fear, stress, and discrediting the educational environment, and [to] maintain peace for themselves and their children”); *Rumors of poisoning in Kerman schools*, IRIB (Mar. 6, 2023) (denying a poisoning occurred in Kerman and urging families “not to pay attention to rumors”).

<sup>485</sup> See, e.g., *Khatami: Judiciary should deal decisively with rumor-mongers in the students' plight*, TASNIM (Mar. 10, 2023) (quoting Friday prayer leader in Tehran Ahmad Khatami who called for harsh treatment for anyone caught spreading rumors about the poisoning incidents, including anyone who blames religious figures); TASNIM (Mar. 10, 2023) (quoting Ibrahim Azizi, deputy chairman of the National Security Commission in Parliament); *Mohseni Ejei: 82,000 people have been granted amnesty/22,000 of those pardoned are rioters*, ISNA (Mar. 13, 2023) (quoting head of the Judiciary Mohseni Ejei, who called for “appropriate legal action” against those who spread rumors).

<sup>486</sup> See *infra* Part II.B(ii)(d) (detailing arrests made during this time, which included, as far as we could tell, three domestic news outlets for reporting on the poisoning incidents, and at least nine individuals for sharing information, often via social media, about the poisonings).

<sup>487</sup> See *The Story of Serial Poisonings, Roots and Possibilities*, IRNA (Mar. 1, 2023) (reporting that apart from the Minister of Education, “the statements of other relevant officials indicate the matter was intentional”); see also *Poisonings that are found to be intentional*, AKHARIN Khabar (Feb. 28, 2023) (quoting Prosecutor-General Mohammad Jafar Montazeri, who said that “the poisoning of Qom students is probably intentional and a criminal act”); *Chemical compounds responsible for poisoning Qomi students*, IRIB (Feb. 26, 2023) (reporting that Deputy Minister of Health and Medical Education, Younes Panahi, stated that while the investigations are ongoing, “what has been proven is [there is] a chemical compound”); *The causes and perpetrators of student poisoning should be introduced to the public*, ISNA (Mar. 1, 2023) (quoting Tehran MP Mohsen Pirhadi, stating that the “repetition of the incidents ... in several other cities ... has refuted any suspicion that it was unintentional”);

<sup>488</sup> *Chemical compounds responsible for poisoning Qomi students*, IRIB (Feb. 26, 2023) (reporting that Deputy Minister of Health and Medical Education Younes Panahi stated that “some people wanted all schools, especially girls’ schools, to be closed”); *Herald: We are following the story of whether the poisoning of the schoolgirls was intentional*, ISNA (Feb. 27, 2023) (quoting head of the Parliament’s Education and Research Commission Alireza Monadi, who said that “the fact that there was an evil will and thought behind the incident to prevent the children of this land, especially our girls, from receiving an education is a significant risk and is very bad news”).

<sup>489</sup> *Vahidi: No one has been arrested in connection with the poisoning of students/Security forces are busy searching for clues*, TASNIM (Mar. 1, 2023).

<sup>490</sup> *Sardar Jalali: Poisonings are caused by direct intervention of the current of hypocrisy and hostility*, ISNA (Mar. 5, 2023) (quoting head of the national passive defense organization Gholamreza Jalali, who said that “the opposition” is “fueling social panic through social media and simulating poisonings in other cities”); *We must shed light on the conspiracies of our enemies*, ISNA (Mar. 5, 2023) (quoting Basij Major General Bahman Reyhani, who said “it cannot be denied that the enemies are trying to create an atmosphere of fear and psychological warfare with

themselves and in contradiction to other officials' statements about evidence they had found through ongoing investigations.<sup>491</sup> Not all government officials made this shift immediately, and some, including President Raisi and Ayatollah Khomeini, continued to call the acts intentional several days after Vahidi's statement.<sup>492</sup> Other officials did fall in line quickly though, making sudden shifts in their positions,<sup>493</sup> some of which were so abrupt that they were perceived by some media sources to have been forced to do so.<sup>494</sup> State-affiliated news media similarly began to follow the Interior Minister's framing, alleging that "anxiety itself" was causing these

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the aim of forcing the closure of girls' schools"); *Timeline of the student poisoning incident; everything everyone said from the beginning to today*, ROUYDAD24 (Mar. 10, 2023) (reporting that Deputy Interior Minister for Security said the planners of the "Woman Life Freedom" movement and the students' poisonings are the same, and their main goal is to "creat[e] psychological insecurity").

<sup>491</sup> *Ministry of Interior Statement on the Issue of Student Poisoning/Discovery of Suspicious Samples*, ISNA (Mar. 3, 2023) (reprinting a statement by the Ministry of Interior that explained they were conducting ongoing field investigations and "suspicious samples" had been found and were being tested).

<sup>492</sup> *Ayatollah Raisi: The enemy's conspiracy to poison students is a crime against humanity*, ISNA (Mar. 5, 2023) (calling the poisonings "a crime and an inhumane act"); *Revolutionary Leader: The issue of poisoning students is a major and unforgivable crime*, ISNA (Mar. 6, 2023) (quoting Ayatollah Khomeini, who called the poisonings "a major and unforgivable crime and ... the perpetrators must be severely punished"); see also *By order of the leadership, the perpetrators of the student poisoning must be identified immediately*, ISNA (Mar. 6, 2023) (quoting Deputy Chairman of Parliament's Social Commission Vali Esmaili who said "this is a reality that is happening," explaining that he had recently been to a hospital treating affected students and two teachers and calling on security forces to "seriously investigate" this issue); *Head of the Parliament's Legal Commission: The perpetrators and those responsible for the poisoning of students must definitely be dealt with severely*, ISNA (Mar. 6, 2023) (quoting head of the Legal and Judicial Commission for Parliament Musa Ghazanfarabadi, who said "it is obvious and clear that this is a crime and the perpetrators and those responsible must be severely punished"); *National Authority for Child Rights Condemns Poisoning of Students*, TASNIM (Mar. 6, 2023) (reporting that the National Authority for Children's Rights, situated within the Ministry of Justice, called for investigations to find the perpetrators).

<sup>493</sup> See *Qom Representative: Serial poisoning of students is suspicious*, Tasnim (Feb. 7, 2023) (quoting the MP for Qom Ahmad Amirabadi Farahani stating that the "poisoning of students in Qom is suspicious"), but see *Poisoning of students in Tehran and Qom/Parents gather in front of Qom Governor's Office*, TASNIM (Feb. 14, 2023) (quoting the same official, who claimed that the poisoning incidents are being "exaggerated" and that the issue can be called a "phobia"); see also *Chemical compounds responsible for poisoning Qomi students*, IRIB (Feb. 26, 2023) (quoting Deputy Minister of Health and Medical Education Younes Panahi, who stated that based on the ongoing investigations, "some people wanted all schools, especially girls' schools, to be closed," and while the investigations are ongoing, "what has been proven is a chemical compound" is responsible for the incidents); but see *The Story of Serial Poisonings, Roots and Possibilities*, IRNA (Mar. 1, 2023) (reporting that Panahi retracted his first statement a day later, saying instead that "What I have been quoted about the external causes of these poisonings and their intentionality is not confirmed, and there has been no such quote"); *The causes and perpetrators of student poisoning should be introduced to the public*, ISNA (Mar. 1, 2023) (quoting MP for Tehran Mohsen Pirhadi saying that the "repetition of the incidents ... in several other cities ... has refuted any suspicion that it was unintentional"); but see *Pirhadi: Information about the dimensions of student poisoning is slow*, ISNA (Mar. 11, 2023) (quoting MP Pirhadi contradicting his earlier assessment, instead attributing the incidents as partially caused by "the enemy's psychological operations" and partially based in reality); *Timeline of the student poisoning incident; everything everyone said from the beginning to today*, ROUYDAD24 (Mar. 10, 2023) (reporting that on March 7, an epidemiologist in Iran, Dr. Mohammad Reza Hashemian, changed his initial stance from saying that access to the substances that caused the poisoning was not possible for ordinary people, to saying in an Instagram post that "objective observations and clinical research show that 90% of student poisonings are caused by stress and hysteria, not inhalation of a toxic substance").

<sup>494</sup> *Political poisoning!*, TABNAK NEWS (Mar. 2, 2023) (reporting that Panahi was clearly forced to retract his statement, demonstrating officials' "lack of transparency and concealment" around the poisoning investigations); see also *The Story of Serial Poisonings, Roots and Possibilities*, IRNA (Mar. 1, 2023) (reporting that "public opinion assessed [Panahi's] second statement as being under pressure and did not take it seriously").

incidents<sup>495</sup> and publishing detailed articles, some of which included interviews with psychologists, laying out the case for why many of these incidents were caused by mass social panic or hysteria and not poisoning.<sup>496</sup>

In addition to these two overarching trends, the way state-affiliated news media covered the incidents themselves also began to change. While in February 2023, they reported on the incidents more or less as if they were actual poisonings,<sup>497</sup> beginning in early March 2023, more articles published by IRNA, IRIB, and Tasnim began more systematically to cast doubt about the poisonings, as local officials initially did in Qom. They did this by attributing incidents to girls'

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<sup>495</sup> [\*How can "general hysteria" cause or exacerbate symptoms similar to poisoning?\*](#) TASNIM (Mar. 5, 2023) (alleging that “anxiety itself” among female students was causing many of these incidents and “some kind of public hysteria” had taken hold).

<sup>496</sup> See, e.g., [\*How can "general hysteria" cause or exacerbate symptoms similar to poisoning?\*](#) TASNIM (Mar. 5, 2023) (alleging that girls may be feeling symptoms of poisoning in this “toxic” media environment with even the “slightest natural and everyday occurrence”); [\*Why do hostile media insist on using the term "chemical attack" on girls' schools?\*](#) ISNA (Mar. 5, 2023) (alleging that “the intense psychological atmosphere has led to fear and panic”); [\*Revisiting global examples of "mass hysteria" with symptoms of illness or poisoning\*](#), TASNIM (Mar. 6, 2023) (detailing a list of other examples of “mass hysteria” around the globe where individuals claimed they had symptoms of illness or poisoning); [\*American researcher examines poisoning scenarios in girls' schools + video\*](#), IRNA (Mar. 7, 2023) (interviewing psychologist Robert Bartholomew, who said that “mass mental illness is most likely the main cause of these events, especially considering during these three and a half months no one has been arrested, no chemical substance has been detected, and you see that most of the young girls ... have recovered quickly”); [\*Psychological effects of serial poisoning of students/Let's bring peace back to schools with empathy\*](#), ISNA (Mar. 10, 2023) (featuring an interview with a psychologist at the University of Tehran, who attributed the poisonings to a “psychological” phenomenon); [\*The incidents in some girls' schools are due to psychological sensitivity/there is no poisoning involved\*](#), IRNA (Mar. 11, 2023) (quoting psychologist Gholamali Afrooz also at the University of Tehran, who stated that “this issue is not a poisoning, and we should not use this term for this issue”).

<sup>497</sup> See, e.g., [\*Poisoning of 15 students of Qom's Fatemeh Girls' High School\*](#), IRNA (Jan. 28, 2023) (reporting that students in Qom were “poisoned” and transferred to medical centers in the city); [\*Continuation of the series on poisoning of Qomi students/ 7 students and a teacher were poisoned\*](#), TASNIM (Feb. 1, 2023) (reporting on another incident in Qom, calling it a poisoning and reporting that a teacher also was sent to the hospital); [\*What is the cause of the suspicious serial poisonings of students?!/ A "tangerine-like smell" is emitted during poisoning!\*](#), TASNIM (Feb. 13, 2023); [\*Poisoning of students in Tehran and Qom/Parents gather in front of Qom Governor's Office\*](#), TASNIM (Feb. 14, 2023); [\*Poisoning of students in schools/Family concerns and strange silence from responsible agencies\*](#), TASNIM (Feb. 28, 2023) (demanding more information about what was going on from responsible officials).

anxiety or fear;<sup>498</sup> downplaying symptoms;<sup>499</sup> presenting doubtful explanations for what happened;<sup>500</sup> denying that certain incidents happened at all,<sup>501</sup> and occasionally blaming student

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<sup>498</sup> See, e.g., *Poisoning of several students at a girls' school in Islamshahr*, TASNIM (Mar. 4, 2023) (“It should be noted that more than the effects of poisoning on students, stress and psychological pressure have caused the students and their parents to feel worse”); *No student has been poisoned in the central province*, IRNA (Mar. 4, 2023) (“No symptoms of poisoning have been observed in the students, and the results of all blood and urine tests have been reported as normal, and most of these symptoms were due to psychological and stress-related conditions”); *Poisoning of students in 4 schools in Shiraz city*, TASNIM (Mar. 5, 2023) (quoting a local official who said that “we do not have any students who are ill ... most students are anxious and a large number of them will be discharged by tonight”); *35 students from Neyshabur and Ouchan schools were taken to medical centers with symptoms of poisoning*, IRNA (Mar. 6, 2023) (quoting the local mayor who told IRNA that “according to the field visit, a number of students were also stressed due to the psychological climate that caused worry and anxiety, but they did not have” poisoning symptoms); *Transfer of a number of students from 3 cities of Lorestan to the hospital*, TASNIM (Mar. 6, 2023) (quoting a local mayor attributing the cause to “mostly [] fear”); *11 Birjandi students discharged from hospital*, IRNA (Mar. 14, 2023) (reporting that according to a local official in South Khorasan Province, “13 Birjandi students were referred to the hospital today due to stress and anxiety caused by smelling gas, and 11 were discharged,” and quoting him asserting that “no poisoning has occurred ... only anxiety and stress among students”).

<sup>499</sup> See, e.g., *Poisoning of students in Semirom*, IRIB (Mar. 4, 2023) (reporting that students in the city of Semirom in Isfahan Province felt “unwell” and requested an examination, seemingly downplaying their symptoms or the severity of the incident); *Poisoning of students in 4 schools in Shiraz city*, TASNIM (Mar. 5, 2023) (reporting that students experienced symptoms “related to poisoning” but then emphasizing that students did not experience severe symptoms, most had been discharged and most of them were simply anxious); *What was the story of the poisoning of students at Payam Shahed School in Isfahan?* TASNIM (Mar. 5, 2023) (downplaying girls’ symptoms and the severity of the incident, reporting that “a number of students requested an examination from school officials after smelling an odor and complaining of a burning throat”); *What was the process of sending a number of Sanandaj students to the hospital?* IRNA (Mar. 6, 2023) (reported that the students problems were not serious and their condition was favorable, and that emergency medical personnel were dispatched merely because some students expressed “distress”); *An explanation of the latest situation of ill students in Khuzestan*, IRIB (Mar. 6, 2023) (reporting generally on the poisonings in Khuzestan and other locations, writing that while “poisonings of female students have occurred in various parts of the country,” generally, “all students have been discharged in good condition” and “no deaths have been reported”).

<sup>500</sup> See, e.g., *Was the mass poisoning of Ilam students true?*, TASNIM (Mar. 1, 2023) (reporting that despite “rumors” on social media, no students were poisoned in Ilam, instead, an electrical cable burned and caused a bad smell in the school); *Poisoning of students at Shahriar Namaki Conservatory in Sanandaj denied*, TASNIM (Mar. 2, 2023) (reporting that contrary to allegations, no student had been hospitalized or poisoned in Sanandaj, Kurdistan, instead, a car battery exploded and students suffered from some chest and lung pain as a result); *Poisoning of students in Baghershahr denied*, TASNIM (Mar. 4, 2023) (reporting that an alleged poisoning in Baghershahr wasn’t true, instead, the smell – according to student statements – was caused by perfume); *Students at Imam Khomeini School in Bukan had cold symptoms*, IRNA (Mar. 5, 2023) (claiming that students at a boys’ school were not poisoned, they simply had cold symptoms); *Denial of poisoning of students in Khorramshahr*, IRNA (Mar. 5, 2023) (claiming that there was a rumor of student poisoning in Khorramshahr but the source of the smell was related to the alcohol factory and no students had been poisoned); *Denial of poisoning and closure of Kermanshah schools*, Tasnim (Mar. 5, 2023) (claiming that the reports of poisoning are not true, and that students and teachers did go to the hospital but their symptoms were caused by a scrap dealer who set fire to a waste pile behind the school and the smoke from the pile made people sick); *Pesticide spraying in orchards causes fear of poisoning among students in Doogh Abad Mahalat Village*, IRIB (Mar. 5, 2023) (reporting that while students were afraid they had been poisoned, upon examination, “no signs of poisonings were seen” and instead they simply smelled pesticides being sprayed); *Transfer of a number of students from 3 cities of Lorestan to the hospital*, TASNIM (Mar. 6, 2023) (claiming that no poisoning happened in Durud, Lorestan province, and instead the students were afraid of two firecrackers being thrown, according to the mayor of Durud); *What was the process of sending a number of Sanandaj students to the hospital?* IRNA (Mar. 6, 2023) (claiming that while a number of students left class after smelling gas, the principal found no specific source and said it smelled like burning tires and garbage and was likely coming from outside of the school grounds).



misbehavior.<sup>502</sup> After the first week of March, ISNA reported that officials would not be providing any additional information about the poisonings.<sup>503</sup>

Phase 3 (March 21, 2023 – May 31, 2023): After the start of the Persian new year on March 21, 2023, state-affiliated news media appeared to take a different approach. Instead of near-daily coverage of the incidents, state-affiliated news media outlets were largely silent on the continuing poisoning incidents. Aside from two IRNA articles on April 4 that reported two poisoning incidents,<sup>504</sup> we found very few articles in April and May 2023 discussing any poisoning incidents at all.<sup>505</sup> The few that did simply denied that a poisoning had occurred or downplayed the severity of girls' symptoms.<sup>506</sup> Officials, too, were largely silent during this time.<sup>507</sup> While Deputy Interior Minister Majid Mirahmadi acknowledged that poisoning incidents

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<sup>501</sup> See, e.g., [No student has been poisoned in the central province](#), IRNA (Mar. 4, 2023) (stating that “no student in the central province has been poisoned and all rumors spread on social media are false”); [Poisoning of students at Janat Girls' Elementary School in Sanandaj denied](#), TASNIM (Mar. 4, 2023) (reporting that claims from “hostile media” of poisoning at a primary school in Sanandaj are false, and “no traces or smell of gas were observed”); [Rumors of poisoning in Kerman schools](#), IRIB (Mar. 6, 2023) (reporting that there were false rumors that a poisoning occurred in Kerman); [Khoy students' poisoning claims not confirmed in tests](#), IRNA (Mar. 6, 2023) (claiming that according to head of education in Khoy, Urmia, expert visits were made to school where there were rumors students had been poisoned and “the necessary assurance was obtained that all students were in good health,” and while several students were taken to the hospital, “test results did not find any symptoms of poisoning”); [Denial of poisoning in Amol and Sari/Students had no symptoms](#), TASNIM (Mar. 6, 2023) (Tasnim claimed that no students had symptoms in Sari and Amol and there was no poisoning, despite reports to the contrary); [No student in Bushehr province has been poisoned](#), IRNA (interviewing Director General of Education in Bushehr who denied any poisonings had occurred there, saying that “in the past, there were cases of students' weakness due to not eating breakfast or long morning lines, which were dealt with normally, but today, if the same thing happens in a school, it is immediately linked to the issue of poisoning”); [No cases of poisoning of Taibadi students have been observed so far](#), IRIB (Mar. 9, 2023) (reporting that news had been published online claiming that a number of students in the city of Taybad had been poisoned but a local official claims that “this news lacks any official documentation and is not true”).

<sup>502</sup> See, e.g., [Pepper spray was the cause of Isfahan students' illness/Poisoning was a lie](#), TASNIM (Mar. 6, 2023) (claiming that students were “unwell” because one student released pepper spray into the air); [Decrease in school incidents on Tuesday](#), TASNIM (Mar. 8, 2023) (according to Deputy Minister of Interior Majid Mirahmadi, some of the incidents were caused by students themselves based on adventure, wanting to close classes, or just joking with their friends).

<sup>503</sup> [Ministry of Intelligence statement on poisoning of students in a number of schools](#), ISNA (Mar. 8, 2023) (quoting a statement published by the Ministry of Intelligence, which states in part “until definitive results can be obtained that can be generalized to other cases, information [will not be] provided.”).

<sup>504</sup> [20 female students in Tabriz were poisoned/The students' general condition is good](#), IRNA (Apr. 4, 2023); [Poisoning-like symptoms at a girls' school in Mohammadyar Naqadeh/ All students have been discharged](#), IRNA (Apr. 4, 2023).

<sup>505</sup> See Appendix A for a list of the searches conducted to identify articles.

<sup>506</sup> See, e.g., [The story of the poisoning of 95 students in Ajabshir and Maragheh schools](#), ISNA (Apr. 6, 2023) (reporting that “no symptoms of poisoning caused by a specific substance has been seen in these students”); Poisoning of students at two girls' schools in Khuzestan, ISNA (Apr. 8, 2023) (reporting that no students had been hospitalized or were seriously ill); [Denial of poisoning of Dezful students](#), IRIB (Apr. 19, 2023) (reporting that students were transferred to the hospital in Khuzestan Province but “after investigation, it was determined that not a single case was due to poisoning”); [One of Babolsar schools closed due to mischief by 2 female students](#), IRNA (May 9, 2023) (reporting that students were unwell in Babolsar but that this was caused by female students setting off a fire extinguisher and claiming it was poisoning).

<sup>507</sup> One official who did speak out during this time was a religious leader who, during Friday prayer on April 10, urged security, intelligence, and military officials to identify the perpetrators of the student poisonings. See [Authorities should deal strictly with those responsible for poisoning in schools](#), IRNA (Apr. 10, 2023).



were continuing, he chalked them up to student mischief and assured the public that classes were moving forward as normal.<sup>508</sup> On May 1, the Acting Minister of Education re-asserted that the poisonings were largely psychological and claimed simply that the issue has been resolved, without offering further details.<sup>509</sup> He also claimed, in a gross misrepresentation of the facts, that the incidents had only reached five schools across Iran.<sup>510</sup>

It is not clear exactly why there was a sudden drop-off in coverage and statements, given that poisoning incidents were still happening.<sup>511</sup> One possibility, and one for which we found evidence supporting, is that news outlets were prohibited from doing so.<sup>512</sup> In any event, what is clear is that unlike during Phases 1 and 2, after March 21, 2023, official news media outlets and government officials were largely silent about the poisoning incidents.

### iii. Summary of Official Statements and Reporting About the Poisonings

Taken together, official statements and reporting about the poisoning incidents – both our cases and the nation-wide incidents – paints a chronological picture for how, over time, the Iranian government addressed the poisonings. The trends in reporting and statements suggest that there was a concerted effort to prevent information about the poisonings from reaching the public, to cast doubt on information that did reach the public, and to spread a narrative that the poisonings were caused by mass hysteria, not toxic agents.

During the first phase, in which the first two poisoning incidents occurred in Qom at Noor Girls' Vocational School, most state-affiliated news outlets (IRNA, Tasnim, and IRIB) approached the first incident largely with silence. This changed after the second incident (our first case), when these media outlets reported that it was a “respiratory” poisoning, but did not initially publish follow-up reporting. Only ISNA appeared to take the incidents seriously. Local Qom officials, meanwhile, refused to answer follow-up questions and downplayed girls' symptoms, alleging that the girls were simply experiencing muscle cramps from “stress.” Following the second incident, they refused to speak with ISNA and blocked non-state-affiliated journalists from collecting information at the scene.

During the second phase, there was a massive increase in the number of reported cases, likely making it difficult for officials and state-affiliated news outlets to ignore them. While initially, officials and state-affiliated news outlets reported on the incidents as “poisonings,” with some

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<sup>508</sup> *Recent school incidents were caused by students' mischief*, PARS NEWS (Apr. 11, 2023) (reporting that Deputy Interior Minister said that some incidents were still happening but were due to student mischief).

<sup>509</sup> *The Entire Poisoning Problem Was in Just Five Schools*, SHARGH DAILY (May 1, 2023).

<sup>510</sup> *Id.*

<sup>511</sup> See, e.g., *Recent school incidents were caused by students' mischief*, PARS NEWS (Apr. 11, 2023) (reporting that Deputy Interior Minister confirmed that incidents were still happening); *Poisoning continue in Iran; students taken to hospital in Kermanshah, Sanandaj and Tehran*, BBC News (Apr. 25, 2023) <https://www.bbc.com/persian/iran-65359450> (reporting on several poisoning incidents that occurred in Iran); see also Part I (detailing several incidents that happened on April 8, 9, and 10, and 11).

<sup>512</sup> See @Vahid Online, X <https://x.com/Vahid/status/1645074730414665730> (reposting an order by the Press Supervision Board under the Ministry of Cultural Affairs to refrain from reporting on the poisoning incidents on April 10, 2023).

calling the acts “intentional,” over time they shifted how they discussed the poisonings. The first shift was a move away from demanding more information from responsible officials, and towards blaming the media – including foreign media – for causing societal panic about the poisonings. The second shift was from calling the incidents intentional to attributing them to girls’ anxiety and mass hysteria. The second shift appears to have been started – at least publicly – by Interior Minister Vahidi, who gave the initial statement alleging that the vast majority of poisoning incidents were psychological. In both shifts, there was a clear effort to move attention onto the role that fear and panic were playing in the poisonings, and a rising concern about non-official information being spread about the poisonings. Indeed, local officials often instructed the public to ignore rumors and refer only to “official” news outlets to obtain information, and in several of our cases, officials prevented reporters from interviewing affected girls and threatened people that security agencies would deal with anyone caught sending videos of incidents to “hostile networks.” During this time, reporting by state-affiliated news outlets about our cases and about cases nation-wide tended to downplayed girls’ symptoms or attributed them to anxiety, presented doubtful explanations for what happened, or sometimes denied the incidents occurred at all.

During the third phase, the government appears to have clamped down on information spreading about the poisonings entirely. Officials and state-affiliated news outlets largely refused to publish any information about the poisoning incidents at all, despite the incidents continuing and despite these same outlets having reported on incidents that occurred in the same cities just a month earlier. When they did report on the incidents, state-affiliated media outlets often denied they occurred, refused to use the word “poisoning,” focused on the girls’ alleged anxiety, and downplayed the girls’ symptoms. It was reported that during this time, news outlets were prohibited from reporting on the poisonings.

In sum, over time, there appears to have been a concerted effort to prevent information about the poisonings from reaching the public, to cast doubt on information that did reach the public about the poisonings, and to intentionally spread a narrative that attributed the poisonings to mass hysteria instead.

## B. Official Actions Taken in Response to the Poisoning Incidents

This Section details state actions taken in response to each of our cases along with national responses to the poisoning incidents overall. For our cases, we divide these actions between those taken immediately following the incident and then investigations and arrests pursued in the subsequent days. For the rest of the reported incidents across Iran, we mapped the national investigations announced, the results publicly declared from each investigation over time, and any arrests made in connection with the poisoning incidents.

While a more detailed summary is provided below in Subpart iii, generally, officials appeared more concerned with preventing information or societal unrest about the poisonings from spreading than they did with ensuring student safety, a trend that was apparent both in our cases and nationally across other cases around Iran. In follow-up investigations for our cases, officials announced explanations for just six cases, but these explanations tended to lack evidentiary

support or were contradicted by other evidence. Nationally, investigatory teams announced initial findings that toxic agents had been discovered, proving that the incidents were poisonings. However, these findings were replaced over time, with limited supporting evidence, by assertions that the vast majority of alleged poisonings were caused by mass hysteria. Iranian officials claimed that more than 100 people were arrested in connection with the poisonings, but few details were ever released about these individuals or what justified their arrests, nor did we find any information about whether they were ever tried and convicted in a court of law under due process. This opacity is contrasted with the specificity often provided with regards to individuals and news outlets arrested or indicted for spreading information about the poisonings.

## i. Official Actions Taken in Response to Our Cases

This subsection details actions taken by Iranian government officials in response to our cases, divided into three categories:

- (1) immediate protective measures taken by officials;
- (2) follow-up protective measures to protect schools from future incidents; and
- (3) investigations pursued after the incidents occurred.

### *1. Immediate Protective Measures Taken by Officials in Response to Our Cases*

Four categories of immediate action taken by officials in some, but not all, of our cases are detailed below, based on evidence from our case files: (1) evacuations of schools led by school administrators, (2) the arrival of emergency medical personnel, (3) police presence at schools or hospitals, and (4) IRGC presence at schools or hospitals. Evidence from these four categories of immediate official action indicate that, while emergency medical personnel did arrive to assist girls in distress following the incidents, the state appeared more concerned with preventing information or societal unrest from spreading than they did with keeping the girls safe.

#### a. Emergency Medical Personnel Presence

In all of our cases, there is convincing evidence that emergency personnel arrived on the scene to treat girls once they exited the schools. In almost every case, we have video evidence documenting the presence of ambulances and other emergency medical personnel who arrived on the scene to assist girls experiencing symptoms.<sup>513</sup> In several cases, there were reports that

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<sup>513</sup> See, e.g., *Poisoning of 51 students and staff of Noor Vocational School in Qom*, IRIB (Dec. 14, 2022) (Doc. 287\_01) (IRIB documenting emergency personnel arriving for the December 13, 2022 Qom case); @IranIntl, X (Feb. 25, 2023) <https://x.com/IranIntl/status/1629438618593886210?s=20> (Doc. 255\_03) (documenting several ambulances arriving at Ahmadiyyah Girls' High School in Borujerd on February 25, 2023); *An account from one of the students about the serial poisonings at Ahmadiyeh School in Borujerd*, TASNIM (Feb. 25, 2023) (Doc. 255\_10) (same); @bbcpersian, X (Feb. 26, 2023) <https://x.com/bbcpersian/status/1629811334417186817> (Doc. 257\_09) (documenting several ambulances and emergency personnel at 15 Khordad Girls' High School in Borujerd on February 26, 2023); @Sokhaniaznikan, TELEGRAM (Feb. 26, 2023) <https://t.me/Sokhaniaznikan/139066> (Doc. 257\_11) (same); @B80umUFC9BnCTJX, X (Feb. 26, 2023) <https://x.com/B80umUFC9BnCTJX/status/1629792501539192833> (Doc. 257\_14) (same); @Gozareshgar, YOUTUBE (Feb. 28, 2023) <https://www.youtube.com/watch?v=96gXmPik1Io> (Doc. 357\_01) (documenting ambulances and emergency personnel at Khayyam Girls' High School in Pardis, Tehran Province on February 28, 2023); @radiojibi, X (Mar. 1, 2023) <https://x.com/radiojibi/status/1630979646136229888> (Doc. 359\_01) (capturing emergency medical personnel helping a girl up from 13 Aban Girls' Middle School in while an ambulance waits in

emergency personnel arrived late, but we disregard these reports because we do not have enough information about how long the delays were and what caused them. While we do not have much information about treatment affected girls received to assess whether they were provided appropriate medical care, the fact that emergency medical personnel were present on the scene in every case at the very least indicates that local emergency medical personnel in Iran took appropriate action in responding to the poisoning incidents.

#### b. Evacuations of Schools Led by School Administrators

In five of our thirteen cases, there were allegations that girls were prevented from leaving school buildings by administrators. One report was from an eyewitness in Saqqez, Kurdistan for an incident on April 9.<sup>514</sup> The other four of these reports all occurred in Isfahan Province on April 11, 2023. These allegations were reported by Iran-based news media outlets, including the state-affiliated outlet ISNA.<sup>515</sup> In several cases, reports that students were not allowed to evacuate school buildings also appear to be documented through video evidence; in one incident, a parent or bystander can be heard saying in the background of a video saying “they are not even letting them out now,” presumably in reference to administrators not letting students out.<sup>516</sup> There are assertions that some sort of directive might have been issued to school administrators from the Ministry of Education. Indeed, this possibility was suggested by ISNA, which speculated that the Ministry of Education did not appear to have sent “the correct [...] instructions to administrators to deal with these incidents.”<sup>517</sup> Another possibility is simply that administrators were scared of being blamed for the incidents, and thus tried to keep students inside – presumably to prevent

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the background in Tehran, on March 1, 2023); @ManotoNews, X (Mar. 5, 2023) <https://twitter.com/ManotoNews/status/1632355696091234306> (Doc. 184\_18) (capturing an ambulance parked outside of the school gates of Hazarat Zeyneb Girls’ High School in Ramhormoz, Khouzestan Province on March 5, 2023); @mizangorup, TELEGRAM (Apr. 8, 2023) <https://t.me/mizangorup/43860> (40\_18) (film of an ambulance parked out front of Sema Girls’ High School in Ardebil City, Ardebil Province, on April 8, 2023); @HengawO, X (Apr. 9, 2023) <https://twitter.com/HengawO/status/1644998757384159233> (Doc. 220\_01) (filming an ambulance in front of Ma’raj Girls’ High School in Saqqez, Kurdistan, on April 9, 2023); @IranIntl, X (Apr. 10, 2023) <https://x.com/IranIntl/status/1645363053700022273> (Doc. 08\_09) (capturing medical personnel and ambulances at Sadr Girls’ High School in Karaj, Alborz province on April 10, 2023); @KanalJadidTV, YOUTUBE (Apr. 11, 2023) <https://www.youtube.com/watch?v=FPdJ9WzhryM> (Doc. 143\_01) (capturing ambulances in front of Al Yaseen Girls’ High School in Shahinshahr, Isfahan Province on April 11, 2023); *The continued chemical attacks on girls’ schools and the inaction of government officials in ensuring student safety*, CENTER FOR HUMAN RIGHTS IN IRAN (Apr. 25, 2023) (Doc. 147\_01) (eyewitness report that school administrators eventually called an ambulance at Talo’ Girls High School in Shahinshahr, Isfahan Province, on April 11, 2023); @KanalJadidTV, YOUTUBE (Apr. 11, 2023) <https://www.youtube.com/watch?v=rLChAQWIA4> (Doc. 144\_01) (video of the incident that shows an ambulance in the background of Ansari Girls’ High School in Shahinshahr, Isfahan Province, on April 11, 2023) @1500tasvir, TELEGRAM (Apr. 11, 2023) <https://t.me/t1500tasvir/6932> (Doc. 145\_03) (capturing two ambulances in front of Shayan Girls’ High School in Isfahan City, Isfahan Province on April 11, 2023).

<sup>514</sup> Citizen Journalist, *Anger over Saqqez School Poisonings Triggers more Security, Censorship*, IRAN WIRE (Apr. 10, 2023) (Doc. 220\_30) (an eyewitness student who experienced the incident first-hand told a local reporter that she and others were prevented by an administrator from going to the courtyard to get fresh air despite feeling sick).

<sup>515</sup> *What was the cause of the student poisoning in Shahinshahr?* ISNA (Apr. 15, 2023) (Doc. 143\_27) (reporting that according to an interviewed medical staff member who treated the girls, “some administrators [...] insist on keeping students inside of the school to manage the crisis”).

<sup>516</sup> @1500tasvir, TELEGRAM (Apr. 11, 2023) <https://t.me/t1500tasvir/6932> (Doc. 145\_03).

<sup>517</sup> *What was the cause of the student poisoning in Shahinshahr?* ISNA (Apr. 15, 2023) (Doc. 143\_27).



outsiders from learning about the poisonings – as a way of avoiding blame.<sup>518</sup> If the Ministry of Education did issue a directive to keep girls inside, the government put girls’ health and safety directly at risk.<sup>519</sup>

#### c. Police Presence

In three cases, there is documentation police on the scene, either at the school right after the incident occurred or in the hospitals where girls were being treated.<sup>520</sup> Despite their presence and knowledge of the incidents, we did not find announcements that additional security measures were taken by local police to protect schools involved in these or other cases from future incidents (as discussed in greater detail below).

There is some ambiguity about the purpose of police presence at the scene of these poisonings. One possibility is that police were present in order to investigate the events and to restore security at the schools and enhance the students’ safety. Another possibility is that the police were present in order prevent protests or the unauthorized dissemination of information about the poisonings, a possibility we note below is even more likely with respect to the presence of IRGC officials. If the reason for a police presence was to investigate wrongdoing, restore security, and enhance safety, it is notable that the regular police were present in fewer of our cases than were IRGC officials.

#### d. Potential IRGC Presence

In six cases, security officials were present who possibly included members of the IRGC (such as the Basij, a subsidiary of the IRGC).<sup>521</sup> In several cases, security officials were reportedly

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<sup>518</sup> As described by Ma’raj’s principal who resigned in civil protest after the poisoning incident there on April 9, teachers and administrators may have been afraid of being blamed for the incidents, and sought to avoid such blame by keeping students inside. See @Hengaw\_Org, TELEGRAM (Apr. 15, 2023) [https://t.me/Hengaw\\_Org/18392](https://t.me/Hengaw_Org/18392) (Doc. 220\_35) (detailing the principal of Ma’raj Girls’ High School resignation, which she characterized as a “civil protest” over, among other things, frustration about being blamed for the incidents).

<sup>519</sup> See *What was the cause of the student poisoning in Shahinshahr?* ISNA (Apr. 15, 2023) (Doc. 143\_27) (quoting a medical professional, who explained to ISNA that holding students inside the school could be irreparably harmful to them, especially for those with underlying health conditions).

<sup>520</sup> Those cases are: the Feb. 25 incident at Ahmadiyya Girls’ High School in Borujerd, Lorestan Province, where a police car can be seen in video footage, @IranIntl, X (Feb. 25, 2023) <https://x.com/IranIntl/status/1629438618593886210?s=20> (Doc. 255\_03); and the Mar. 5 incident at Hazarat Zeyneb Girls’ High School in Ramhormoz, Khuzestan Province, where police can be viewed on videos at the school, @poshtpardeha, TELEGRAM (Mar. 5, 2023) <https://t.me/poshtpardeha/182727> (Doc. 184\_13); @ManotoNews, X (Mar. 5, 2023) <https://twitter.com/ManotoNews/status/1632355696091234306> (Doc. 184\_18), and whose presence was confirmed by state media, *More than 60 critically ill students in Ramhormoz were sent to medical centers*, IRIB (Mar. 5, 2023) (Doc. 184\_22).

<sup>521</sup> Those cases are: the Feb. 26 incident at 15 Khordad Girls’ High School in Borujerd, Lorestan Province, where eyewitnesses reported that security officials were present in the hospital where girls were treated, *Stink Bombs: New details about the poisoning incident of schoolgirls at two high schools and one elementary school in Borujerd*, HAM MIHAN (Feb. 27, 2023) (Doc. 255\_16); the Mar. 1 incident at 13 Aban Girls’ Middle School in Tehranasar, Tehran Province, where eyewitnesses reported that plain clothes officers watched the incident unfold and ordered people not to chant, *Hajer and 13 Aban schools were also added to the list of poisonings / The school officials were only trying to evacuate the school and calm the situation / The smell of rotten eggs filled the air / The children were foaming at the mouth*, SHARGH DAILY (Mar. 1, 2023)

(Doc. 359\_32), and video evidence captures several possible security officials, one of whom is dressed in camouflage, @ICHRI, X (Mar. 1, 2023) <https://x.com/ICHRI/status/1631311955288784896> (Doc. 359\_05); the

present at the hospitals where girls were being treated.<sup>522</sup> In addition, security officials were also reported to be present at schools following incidents, although they were reported to be preventing protests and limiting reporters' access to affected persons rather than serving a security function. On March 1, for example, when the incident at 13 Aban Girls' Middle School occurred, eyewitnesses reported that plain clothes officers were present ordering people not to protest in front of the school.<sup>523</sup> Video evidence confirms security officials' presence at the school, as does Tasnim reporting (although Tasnim claims they were police officers).<sup>524</sup> Yet video evidence suggests that they were not all police officers, as one man filmed is wearing full camouflage.<sup>525</sup> Later, this man in camouflage, together with other men in plain clothes, is filmed violently assaulting a mother<sup>526</sup> (officials denied these men were affiliated with the state).<sup>527</sup> At the same time, domestic news outlet Student News Network (SNN) also reported that unspecified security officials prevented them from gathering evidence about the incident at 13 Aban.<sup>528</sup>

It is unclear why IRGC personnel would need to be present in hospitals where girls are being treated, nor is it clear why such personnel would be seemingly primarily focused on preventing information from reaching the press or prohibiting protests if the state was motivated by a desire to protect the girls. While it is possible these officials were present to protect girls and teachers from additional incidents, we do not have evidence indicating this. Instead, the most plausible interpretation of the available evidence suggests that these security officials were present for some combination of efforts to prevent protesters from speaking out, to gather intelligence, and to prevent non-state-affiliated persons from gathering and sharing information about the incidents.

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Apr. 9 incident at Ma'raj Girls' High School in Saqqez, Kurdistan Province, where a father of an affected girl said that he was prevented from security officials from filming in the emergency room where girls were being treated, @kurdpa\_farsi, X (Apr. 10, 2023) [https://twitter.com/kurdpa\\_farsi/status/1645161551345639430](https://twitter.com/kurdpa_farsi/status/1645161551345639430) (Doc. 220\_04) (partially geolocated); and the four incidents in Isfahan Province on Apr. 11, where ISNA reported that security officials – including an IRGC commander, police commander, Basij commander, and members of the local area's security team – were present in the area, and were in the emergency room reportedly interviewing students about what happened, *What was the cause of the student poisoning in Shahinshahr?* ISNA (Apr. 15, 2023) (Doc. 143\_27).

<sup>522</sup> @kurdpa\_farsi, X (Apr. 10, 2023) [https://twitter.com/kurdpa\\_farsi/status/1645161551345639430](https://twitter.com/kurdpa_farsi/status/1645161551345639430) (Doc. 220\_04) (partially geolocated); *What was the cause of the student poisoning in Shahinshahr?* ISNA (Apr. 15, 2023) (Doc. 143\_27).

<sup>523</sup> *Hajer and 13 Aban schools were also added to the list of poisonings / The school officials were only trying to evacuate the school and calm the situation / The smell of rotten eggs filled the air / The children were foaming at the mouth*, SHARGH DAILY (Mar. 1, 2023) (Doc. 359\_32).

<sup>524</sup> *Tasnim reporter's account from in front of a school in Tehran's Tehransar neighborhood / The complex mystery of student poisonings*, TASNIM (Mar. 1, 2023) (Doc. 359\_29).

<sup>525</sup> @ICHRI, X (Mar. 1, 2023) <https://x.com/ICHRI/status/1631311955288784896> (Doc. 359\_05).

<sup>526</sup> @ICHRI, X (Mar. 1, 2023) <https://x.com/ICHRI/status/1631311955288784896> (Doc. 359\_05).

<sup>527</sup> *Police response to the beating of a woman in front of 13 Aban School*, TASNIM (Mar. 2, 2023) (Doc. 359\_28).

Tasnim also announced the arrest of four men allegedly responsible for the incident, although it is unclear whether they are the same men or whether they were scapegoats. *Four people arrested in the case of a woman being beaten in front of 13 Aban School*, TASNIM (Mar. 2, 2023) (Doc. 359\_27).

<sup>528</sup> *Field report by a student journalist on the latest condition of the poisoned students of Shohada-ye 13 Aban School + video*, STUDENT NEWS NETWORK (Mar. 1, 2023) (Doc. 359\_09).

## 2. *Follow-up Safety Measures Announced at Schools to Prevent Future Incidents*

Following the poison attacks in our cases, contrary to what one would expect officials to do, we found limited evidence indicating additional security measures taken to prevent future incidents from happening at schools. Indeed, in only one case did we find any mention of additional security measures being taken: in Qom, two months after our case, school administrators reported meetings with the regional Education Department, the passive defense organization, and emergency response personnel, in which the administrators were told what safety actions to take should another poisoning incident occur.<sup>529</sup> However, school administrators did not report being promised any additional security. In one other case there is video evidence of guards standing in front of school doors at the scene, but it is unclear whether this was an additional security protocol taken by the school or simply standard operating procedure for the school prior to the poisonings.<sup>530</sup>

In no other case did we find statements, reporting, or other evidence that officials took any additional security measures to protect schools following reported incidents, like the deployment of additional security officers at schools to try to prevent unauthorized entry or the installation of additional CCTV cameras, among other possible security measures. Given the fact that security personnel were present at the scene in (at least) six of our cases, and police present for another three, the absence of any announced follow-up security measures is surprising. In fact, evidence from one of our cases suggests that police patrols were never actually provided to girls' schools at all.<sup>531</sup> While we do not necessarily endorse further securitization of Iranian schools as the recommended course of action, it is striking that a state with a significant security apparatus does not appear to have used this apparatus to try to protect schools from an ongoing crisis.

Instead, when security officials were present, it appears that they acted to prevent reporting on or filming the incidents,<sup>532</sup> to threaten the public with action from the "security establishment"<sup>533</sup> should they share videos of the incidents to "hostile networks,"<sup>534</sup> to prevent reporters from conducting interviews with affected students and their families,<sup>535</sup> to prevent parents from

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<sup>529</sup> *"Poisoning Incident" From Anxiety and Delusions to Lack of Work / Briefing Sessions for Teachers to Be Held*, ISNA (Mar. 3, 2023).

<sup>530</sup> See @IranIntl, X (Feb. 25, 2023) <https://x.com/IranIntl/status/1629438618593886210?s=20> (Doc. 255\_03).

<sup>531</sup> See @1500tasvir, TELEGRAM (Apr. 11, 2023) <https://t.me/t1500tasvir/6932> (Doc. 145\_03), @Melim43029819, X (Apr. 11, 2023) <https://x.com/Melim43029819/status/1645720348355076097?s=20> (Doc. 145\_10) (a woman can be heard screaming in a video in front of Shayan Girls' High School in Isfahan City on April 11, 2023, "how many times did I say to close the doors to this school?" suggesting that security measures were not taken to protect girls at Shayan high school); see also Doc. 145\_08 (in an unverified alleged interview with a student, Mizan's Telegram Channel reported that the affected student said that police showed up after the incident occurred and began patrolling the area, strongly suggesting they were not there prior).

<sup>532</sup> See *supra* Part III.C.i.3.

<sup>533</sup> *Pardis County Governor: 35 poisoned students have been discharged from the hospital*, IRNA (Mar. 1, 2023) (Doc. 357\_22).

<sup>534</sup> *Pardis County Governor: 35 poisoned students have been discharged from the hospital*, IRNA (Mar. 1, 2023) (Doc. 357\_22).

<sup>535</sup> See, e.g., *Field report by a student journalist on the latest condition of the poisoned students of Shohada-ye 13 Aban School + video*, STUDENT NEWS NETWORK (Mar. 1, 2023) (Doc. 359\_09).

reaching their children in emergency rooms,<sup>536</sup> and to discourage protests.<sup>537</sup> Men who were possibly affiliated with Iranian security apparatuses were filmed brutally beating a mother of one of the affected children,<sup>538</sup> although officials denied that these men were affiliated with the police or any other security agency.<sup>539</sup> And while security officials were reported to have been interviewing girls in the hospital in Isfahan about what happened, it's unclear if this was to inform an investigation or simply to gain control of the narrative.<sup>540</sup> Taken together, officials appeared intent on using the state's extensive internal security apparatus to prevent the spread of information or protests, but not on preventing future incidents from happening or otherwise protecting the girls and their teachers and school administrators.

In addition, school closures were limited in duration for our cases,<sup>541</sup> if they were closed at all. This is despite the fact that several of our cases involve schools that experienced prior incidents,<sup>542</sup> as well as two schools in provinces in which a number of incidents were reported the day before.<sup>543</sup> While this could be explained by, for example, officials prioritizing the importance of girls' education and not allowing the poisoning incidents to close girls' schools, it

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<sup>536</sup> See @kurdpa\_farsi, X (Apr. 10, 2023) [https://twitter.com/kurdpa\\_farsi/status/1645161551345639430](https://twitter.com/kurdpa_farsi/status/1645161551345639430) (Doc. 220\_04) (partially geolocated).

<sup>537</sup> See @IranIntl, X (Apr. 15, 2023) <https://x.com/IranIntl/status/1647159072242950147?s=20> (Doc. 147\_05) (protesters saying that security officials arrived and spread tear gas and shot them with something while they protested); *Hajer and 13 Aban schools were also added to the list of poisonings / The school officials were only trying to evacuate the school and calm the situation / The smell of rotten eggs filled the air / The children were foaming at the mouth*, SHARGH DAILY (Mar. 1, 2023)

(Doc. 359\_32) (security officials present at the school reportedly telling people not to chant); Doc. 395\_05 (men who appear to be security officials filmed brutally attacking a mother of an affected child at 13 Aban).

<sup>538</sup> @ICHRI, X (Mar. 1, 2023) <https://x.com/ICHRI/status/1631311955288784896> (Doc. 359\_05).

<sup>539</sup> *Police response to the beating of a woman in front of 13 Aban School*, TASNIM (Mar. 2, 2023) (Doc. 359\_28).

<sup>540</sup> *What was the cause of the student poisoning in Shahinshahr?* ISNA (Apr. 15, 2023) (Doc. 143\_27).

<sup>541</sup> We only found evidence of three schools being temporarily closed for the rest of the day of the incident: Ahmadiyyah Girls' High School in Borujerd, closed for the rest of the day of the incident and the day after, *Students affected by poisoning in Borujerd are receiving treatment*, IRNA (Feb. 25, 2023) (Doc. 255\_21); 15 Khordad Girls' High School in Borujerd, closed for the rest of the day of the incident, *Continued poisoning in Borujerd schools / 107 more students were taken to the hospital*, TASNIM (Feb. 26, 2023) (Doc. 257\_32), and Hazarat Zeyneb Girls' High School in Ramhormoz, Khuzestan Province, which was closed for the rest of the day of the incident, see *Poisoning of 115 female students in Ramhormoz*, ISNA (Mar. 5, 2023) (Doc. 184\_10).

<sup>542</sup> These include the incident at Noor Vocational School on December 13, 2022 in Qom, where an incident had occurred 2 weeks prior, *18 students were poisoned in Qom; all of them are in good condition*, ISNA (Nov. 30, 2022) (Doc. 287\_13); and the incident at Sema Girls' High School in Ardebil on April 8, 2023, where girls experienced another incident at the same school five weeks prior, *Serial poisoning of schoolgirls reaches Ardabil / 108 students transferred to hospital*, IRNA (Mar. 1, 2023) (Doc. 40\_26) (confirming that girls at Sema girls' school had been "poisoned" on March 1, 2023).

<sup>543</sup> A number of schools across Khuzestan province were reported to have experienced poisoning incidents on March 4, a day before the March 5 incident at Hazarat Zeyneb Girls' High School in Ramhormoz, Khuzestan Province, *Poisoning of 115 female students in Ramhormoz*, ISNA (Mar. 5, 2023) (Doc. 184\_10) (reporting that 312 students across Khuzestan were "poisoned" on March 4); *Schools in Khuzestan are not closed on Monday*, IRNA (Mar. 5, 2023) (Doc. 184\_27) (reporting that 700 students as of March 4 had been poisoned across Khuzestan). Despite this, Khuzestan officials announced that schools would remain open on March 5. *Schools in Khuzestan are not closed on Monday*, IRNA (Mar. 5, 2023) (Doc. 184\_27) (quoting Dr. Habib Haibar, a spokesperson for the Ahvaz Jundishapur University of Medical Sciences, who said that "no instructions had been announced so far for the closure of schools."). In addition, incidents were reported in Borujerd, Lorestan Province including one of our cases at Ahmadiyyah Girls' High School, yet officials failed to close schools elsewhere in the province, including 15 Khordad Girls' High School, which experienced a poisoning incident the following day.



is surprising that so many schools were not closed at all, and those that were closed were only closed for a short period of time.<sup>544</sup> This gives rise to concerns about whether government officials were adequately prioritizing the girls' safety.

### 3. *Subsequent Follow-up Investigations and Arrests*

As discussed in each case descriptions in Part I.B, investigations were announced in all of our cases that occurred prior to April 2023. But starting in April, there appears to have been a shift in the state's approach. For three cases that happened on April 8, 9, and 10, 2023, occurring in Ardebil, Kurdistan and Alborz Provinces respectively, we found no announcements about follow-up investigations. Officials did announce an investigatory task force in Shahinshahr following nearly a dozen reported incidents across the city on April 11,<sup>545</sup> but that was possibly because officials felt pressured to do so after videos of the incidents attracted significant attention on social media, and not necessarily because this was expected procedure.<sup>546</sup>

Even for the incidents that had follow-up investigations, there appear to have been gaps in evidence collection. For example, for both the incident at Ahmadiyyah and the incident at 15 Khordad in Borujerd, officials do not appear to have gathered samples from the affected girls.<sup>547</sup> Instead, parents were reported to have been told it was their responsibility to test their children.<sup>548</sup> In other cases, evidence that could have been used from CCTV camera footage appears to never have been used or, bizarrely, the CCTV cameras were claimed to have been turned off at the relevant time.<sup>549</sup>

Ultimately, these investigations either failed to produce any explanation at all, or produced explanations that were contradicted by existing evidence. Three alleged perpetrators were arrested and accused of causing four of our cases, but given the evidence that contradicts the state's version of events, the legitimacy of these arrests is suspect. The results of investigations for each case – or lack thereof – are summarized below.

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<sup>544</sup> See *supra* note 541.

<sup>545</sup> *What was the cause of the student poisoning in Shahinshahr?* ISNA (Apr. 15, 2023) (Doc. 143\_27); see also *Accounts of suspicious poisonings from schools in Shahinshahr to dormitories in Tehran*, IRAN WIRE (Apr. 12, 2023) (Doc. 147\_08). It's not clear whether this Shahinshahr city initiative extended to nearby Isfahan City, where one of our other cases was reported. If it didn't – and there's no evidence confirming it did – the April 11 incident in Isfahan City also went un-investigated, like the April 8, 9, and 10 incidents.

<sup>546</sup> See *What was the cause of the student poisoning in Shahinshahr?* ISNA (Apr. 15, 2023) (Doc. 143\_27) (reporting that local officials had yet to respond despite videos of the incidents receiving “millions of views” on social media).

<sup>547</sup> *Families are worried, officials remain silent / Hospitals are not testing the poisoned students / Testing has been left to the families*, SHARGH DAILY (Feb. 27, 2023) (Doc. 257\_28) (according to a medical official who worked at a hospital that treated the affected girls, the hospital did not gather samples or conduct tests about the poisoning agent, nor was this person aware of instructions to do so).

<sup>548</sup> *Families are worried, officials remain silent / Hospitals are not testing the poisoned students / Testing has been left to the families*, SHARGH DAILY (Feb. 27, 2023) (Doc. 257\_28).

<sup>549</sup> See, e.g., *Possibility of identifying those responsible for the poisoning at the girls' school in Borujerd through the available CCTV footage*, ETEMAD DAILY (Mar. 1, 2023) (Doc. 257\_27) (published locations of CCTV cameras around 15 Khordad and on its front gates, and encouraged officials to use these cameras to identify perpetrators); *The Minister Apologized, the Desks Emptied: Accounts from school principals, teachers, and students' families about classrooms after the poisoning incidents*, HAM MIHAN (Mar. 6, 2023) (Doc. 255\_19) (discussing Ahmadiyya school officials claiming that classrooms were equipped with CCTV cameras but they had been turned off during the incident).

a. Cases Where No Explanation Was Provided

Nationwide, local officials would often respond to a poisoning by announcing that the matter was being investigated but would fail to ever provide details about the investigation or follow-up with the public about what caused the incident. This was true for seven of our cases, for which officials failed to ever provide a clear explanation for what occurred.

***Table 2. Summary of Investigative Pursuits in Response to Cases for Which No Explanation Was Provided.***

<p>December 13, 2022: Noor Girls' Vocational School, Qom City, Qom Province</p>	<p><u>Investigations Announced:</u> Initially, local officials told state-affiliated news that they were investigating the cause, including interviewing students and receiving “test samples.” Then in February, a number of investigations were announced into the Qom incidents generally. This included a special working group through the Qom Prosecutor’s Office, which claimed to have been investigating “from the very beginning.” Qom’s Provincial Governor claimed that the passive defense organization was conducting an investigation, and the dean of medical sciences in Qom said that fifteen faculty members were involved in investigating the issue. In mid-February, the Ministry of Health also announced it was forming an expert committee to investigate the poisonings in Qom.</p> <p><u>Samples Gathered:</u> IRNA reported that students underwent “necessary tests” when they arrived at the hospital. Two months later, officials claimed that blood samples had been collected from affected students and samples from schools around Qom, including “air, different surfaces, water, and food.” The samples were reportedly sent to “various advanced laboratories around the country.” Yet no further details were provided about from which schools the samples were gathered or what the toxicology analyses showed.</p> <p><u>CCTV Camera Footage:</u> the Provincial Governor of Qom claimed on February 14 that “all cameras in Qom schools have been reviewed to check for the possibility of the presence of suspicious individuals” by the passive defense organization.</p> <p><u>Investigation Results:</u> No toxicology reports were ever released for this case or the first incident at this school that preceded this case, despite promises to do so. Officials contradicted each other about what the results showed. Some claimed that ammonia had been detected while others denied that ammonia had been detected; others claimed nitrogen (“N2”) gas had been detected, but eventually nitrogen was ruled out. Some officials asserted that the incidents in Qom were “intentional.” Eventually, on March 4, the deputy head of Parliament’s Health Commission said that several types of gases had caused the student poisonings in Qom. However, despite months of investigating, no further details or explanation was provided for what happened at Noor Girls’ School in Qom on December 13, 2022.</p>
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<p>February 25, 2023: Ahmadiyya Girls' High School, Borujerd, Lorestan Province</p>	<p><u>Investigations Announced:</u> At least nine different investigations were announced by national and local officials to look into the poisoning incidents in Borujerd. It is difficult to tell if any were overlapping efforts or who was responsible.</p> <p><u>Samples Gathered:</u> A hospital that treated affected girls did not gather samples or conduct tests, nor did there appear to have been any instructions to do so. Parents were instead reportedly told it was their responsibility to find specialized labs to test their children if they wanted.</p> <p><u>CCTV Camera Footage:</u> School officials confirmed that CCTV cameras were present in the school, but that they had been turned off at the time. This appears to contradict statements by Fatemeh Maghsoudi, MP for Borujerd, however, who claimed that she had viewed CCTV footage that proved the incidents in Borujerd were intentional (although it is unclear which incidents the footage she viewed captured, or what the footage purportedly showed).</p> <p><u>Investigation Results:</u> Three days after the poisoning incident, the First Deputy of the Judiciary announced that the Qom prosecutor had been involved in investigating Qom and Borujerd incidents but “no results have been achieved so far.” State-affiliated media spread several unsubstantiated allegations, including that the oil tanker allegedly responsible for an incident in Pardis was also responsible for the incidents in Borujerd. We did not find another explanation of what happened.</p>
<p>February 26, 2023: 15 Khordad Girls' High School, Borujerd, Lorestan Province</p>	<p><u>Investigations:</u> At least nine different investigations were announced by national and local officials to look into the poisoning incidents in Borujerd. It is difficult to tell if any were overlapping efforts or who was responsible.</p> <p><u>Samples Gathered:</u> A hospital that treated affected girls did not gather samples or conduct tests, nor did there appear to have been any instructions to do so. Parents were reportedly instead told it was their responsibility to find specialized labs to test their children if they wanted.</p> <p><u>CCTV Camera Footage:</u> Local journalists published the locations of CCTV cameras around the school and at its entrance. In addition, MP Fatemeh Maghsoudi, MP for Borujerd, claimed that she had viewed CCTV footage that proved the incidents in Borujerd were intentional (although it is unclear which incidents the footage she viewed captured, or what the footage purportedly showed).</p> <p><u>Investigation Results:</u> Three days later, the First Deputy of the Judiciary announced that the Qom prosecutor had been involved in investigating Qom and Borujerd incidents but “no results have been achieved so far.” State-affiliated media spread several unsubstantiated</p>

	<p>allegations, including that the oil tanker allegedly responsible for an incident in Pardis was also responsible for the incidents in Borujerd. We did not find another explanation of what happened.</p>
<p>March 1, 2023: 13 Aban Girls' Middle School, Tehranasar, Tehran Province</p>	<p><u>Investigations Announced:</u> The Tehran prosecutor Ali Salehi announced one day after the incident at 13 Aban that a special branch of the prosecutor's office would investigate the student poisoning incidents that had been reported in Tehran, which presumably included this one.</p> <p><u>Samples Gathered:</u> N/A</p> <p><u>CCTV Footage:</u> N/A</p> <p><u>Investigation Results:</u> No public explanation for the incident was ever provided.</p>
<p>March 5, 2023: Hazarat Zeyneb Girls' High School, Ramhormoz, Khouzestan Province</p>	<p><u>Investigations Announced:</u> Local officials promised the public that an investigation was underway and that the causes of the incident would be released with the public.</p> <p><u>Samples Gathered:</u> N/A</p> <p><u>CCTV Footage:</u> Photos of the inside of the school taken from the school's social media account indicate that CCTV cameras were installed in classrooms.</p> <p><u>Investigation Results:</u> The Mayor of Ramhormoz explained on the same day the incident occurred that the cause appeared to be a powder-like substance in front of the school doors, but the Provincial Governor of Khouzestan told ISNA the same day that the cause, according to an ongoing investigation, was not in fact this substance and that officials were continuing to investigate. No further information was released, and the results of this investigation were never announced.</p> <p><u>Arrests:</u> The Ministry of Interior reported that over one hundred people were arrested in connection with the poisonings on March 7, including in Khouzestan Province. However few details were provided about who was arrested, why, and for what specific incidents, so we do not know if the arrests were related to this case or not.</p>
<p>April 8, 2023: Sema Girls' High School, Ardebil, Ardebil Province</p>	<p><u>Investigations Announced:</u> None</p> <p><u>Samples Gathered:</u> N/A</p> <p><u>CCTV Footage:</u> N/A</p> <p><u>Investigation Results:</u> No public explanation for the incident ever provided.</p>



April 9, 2023: Ma'raj Girls' High School, Saqqez, Kurdistan Province	<p><u>Investigations Announced:</u> None. Local officials were reported by a local journalist to have met that evening to discuss the incident but made no public statements, nor did they announce follow-up investigations.</p> <p><u>Samples Gathered:</u> N/A</p> <p><u>CCTV Footage:</u> N/A</p> <p><u>Investigation Results:</u> No public explanation for the incident ever provided.</p>
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b. Explanation Provided but Contradicted by Evidence

For six cases, officials did provide an explanation, but these explanations were contradicted by other evidence that casts doubt on the veracity of the explanations.

***Table 3. Summary of Investigative Pursuits in Response to Cases for Which an Explanation Was Provided.***

February 28, 2023: Khayyam Girls' High School, Pardis, Tehran Province	<p><u>Investigations Announced:</u> A local task force was stood up to investigate, and a day later, a different group met to discuss these and other recent poisoning incidents across Tehran Province. MP for Tehran Mohsen Pirhadi also announced the creation of a parliamentary working group.</p> <p><u>Samples Gathered:</u> Local officials were reported to have been on the scene collecting samples from around the school and from affected girls, both of which were reported to have been sent to specialized laboratories for examination.</p> <p><u>CCTV Footage:</u> N/A</p> <p><u>Explanation:</u> A tanker driver left the door of the tanker open while parked in a nearby parking lot. The tanker released Naphtha, a biproduct of oil. Although this was standard practice, according to the driver, the Naphtha gas allegedly entered the school and poisoned the students. Officials claim this conclusion is based on reports of parking guards who were allegedly poisoned and taken to the hospital, and admissions from gathered parents, students, teachers, and administrators.</p> <p><u>Contradictory Evidence:</u> The odor of Naphtha is not aligned with student reports, and it is only poisonous at high concentrations for extended periods of time. According to experts, these high concentrations would have been impossible to achieve in this case without placing a lighter beneath the tanker and directing the gas towards the school. There were no other reports of poisonings in the area that morning, despite multiple buildings and schools being</p>
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	<p>nearby. Few details were provided in support of the parking guards' alleged poisoning, other than an interview with state news media. In addition, a gas officer is filmed on the scene by a bystander saying "nothing has leaked ma'am. It wasn't gas." And in an interview with Pardis TV, affected girls insisted the smell originated from inside of the school building, not outside.</p> <p><u>Arrests:</u> The driver of the tanker was arrested.</p>
April 10, 2023: Sadr Girls' High School, Karaj, Alborz Province	<p><u>Investigations Announced:</u> N/A</p> <p><u>Samples Gathered:</u> N/A</p> <p><u>CCTV Footage:</u> N/A</p> <p><u>Explanation:</u> State-affiliated news outlet Mehr denied any reports of poisoning in this case. Instead, it claimed that the event was caused by a nearby burning transformer which created a burning smell and caused panic among the students. No one suffered medical complications or went to the hospital for further care.</p> <p><u>Contradictory Evidence:</u> Girls can be seen in videos vomiting, coughing, struggling to breathe, and having difficulty standing, possibly from leg paralysis, symptoms that are not easily explained from a burning smell or stress.</p> <p><u>Arrests:</u> None.</p>
April 11, 2023: Three Cases in Shahinshahr, Isfahan Province	<p><u>Investigation Announced:</u> A "crisis team" formed and met to discuss responses. The team was reported to have included local government officials and an unnamed university professor. MP for Shahinshahr Hossein Ali Deligani called on security, administrative, and military institutions to take "action in coordination with judicial authorities and to use all means, including electronic means, to arrest the perpetrators of this crime."</p> <p><u>Samples Gathered:</u> Air and soil samples were reported to have been taken from the city (unclear where) and sent to a nearby medical sciences school for testing, and were alleged to have shown a natural gas leak in the area.</p> <p><u>CCTV Footage:</u> The mayor of Shahinshahr requested all security footage after the incidents. However, we found no mention of whether he was provided this security footage. Nor was any security footage mentioned several days later when authorities attributed the incidents to a natural gas leak. Instead, authorities pointed solely to alleged soil and air samples taken from around the city.</p> <p><u>Explanation:</u> All incidents in Shahinshahr on April 11 were caused by a natural gas leak in the city. The gas was, according to Mayor</p>

	<p>Mohammad Reza Kazemi Taba, smelled in other parts of the city including in parks and offices. The samples taken around the city showed there was a natural gas leak. IRNA and Tasnim said it was mercaptan, an odorous chemical used to alert people of natural gas leaks. The leak allegedly occurred after two workers didn't notice an open valve. Mayor Kazemi Taba claimed the girls were not actually poisoned, they just felt the effects because of the psychological atmosphere in schools.</p> <p><u>Contradictory Evidence:</u> A false apology impersonating the gas company was reported to have been published in which the company claimed responsibility. The gas company was then reported to have responded, saying that they did not publish this apology, there were no gas issues on April 11, and that they would always notify city officials first if there were gas leaks. Yet suspiciously, when officials came forward a few days later blaming the gas company, the gas company accepted responsibility. In addition, there were no reports of an odor, which would be expected if mercaptan was to blame, a fact that state-affiliated news itself pointed out. Finally, it is misaligned with the mayor's response, who initially called the incidents a "crime," only to say several days later that it was a simple act of negligence that did not cause girls anything other than psychological effects.</p> <p><u>Arrests:</u> Two people from the natural gas company were arrested for negligence.</p>
April 11, 2023: Shayan Girls' High School, Isfahan City, Isfahan Province	<p><u>Investigation Announced:</u> N/A</p> <p><u>Samples Gathered:</u> N/A</p> <p><u>CCTV Footage:</u> Locations of CCTV cameras in classrooms were publicly identifiable via social media but no CCTV footage was used.</p> <p><u>Explanation:</u> While officials blamed the incidents in Shahinshahr on a natural gas leak, they did not specify whether this alleged leak also caused the incidents in Isfahan City. State-affiliated media reports that following "numerous interviews with the agencies responsible for these incidents," Isfahan officials believe that the poisoning of students at Shayan School was because an excavator was operating next to the school, producing black smoke which entered the school.</p> <p><u>Contradictory Evidence:</u> No black smoke can be seen in any of the videos we found capturing this incident, nor were there any eyewitness reports we found that made reference to such black smoke. This explanation seems highly unlikely.</p> <p><u>Arrests:</u> None.</p>

## ii. Official Actions Taken in Response to Nation-Wide Poisoning Incidents

Our cases were a fraction of the reported poisoning incidents that occurred in Iranian schools from November 30, 2022 – May 2023, with hundreds of additional poisoning incidents being reported and at least 13,000 students affected.<sup>550</sup> In response, government officials announced a range of security and safety measures to protect students and launched a series of nationwide follow-up investigations that, several months later, led to several generic conclusions about the poisoning incidents. In addition, officials made a number of arrests in connection with the poisonings, including not just alleged perpetrators but individuals and news outlets that reported on the poisoning incidents. Generally, we found that despite these various proclamations, it appears that officials failed to follow through on these promises, with limited security measures provided to schools, investigations that lacked rigorous evidence-gathering and transparency, and limited information about arrests of perpetrators.

This subsection walks through the safety and security measures officials took in response to nation-wide poisoning incidents, followed by the investigations officials pursued and the results of those investigations, and finally, what arrests were announced, including of alleged perpetrators, students, and journalists or citizens sharing information about the poisonings.

### 1. *Safety and Security Measures Taken*

While Iranian officials made announcements of robust security and safety measures taken to protect schools, in reality, it appears these measures were limited and focused on minimizing the spread of information about poisonings rather than on protecting students and teachers.

#### a. *Safety Instructions to School Administrators to Protect Students' Health*

First, officials from the Ministries of Education and Health appear to have tried to provide instructions to school administrators in the event of a poisoning incident. These were reported to involve having students leave the school immediately, referring affected students to medical centers, ensuring there are no strange objects in classrooms, and making sure students have not put any objects in their bags.<sup>551</sup> To help communicate the instructions and provide support to school administrators, emergency committees were reportedly formed by the Ministry of Education in each province around Iran.<sup>552</sup> In addition, the Ministry of Health created a hotline for school officials to call with questions, and an emergency and incident management manual was reported to have been distributed to schools.<sup>553</sup> The manual instructed school officials to ensure health rooms are stocked with “basic equipment and facilities for necessary care,” close cafeterias and laboratories, and shut off gas systems.<sup>554</sup>

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<sup>550</sup> See *supra* notes 435-438.

<sup>551</sup> [\*Education Minister: Schools will not be closed\*](#), TASNIM (Mar. 5, 2023)

<sup>552</sup> [\*We apologize for the concerns of parents/We will inform you about how schools will continue to operate\*](#), ISNA (Mar. 5, 2023).

<sup>553</sup> [\*Hotline 1570 is ready to provide telephone counseling to families in recent school incidents\*](#), TASNIM (Mar. 13, 2023).

<sup>554</sup> *Id.*

Yet contrary to state-affiliated news reporting, local education departments were reported to have given administrators very different instructions, telling them to keep children inside in the event of an incident and to prevent information from being shared to the media.<sup>555</sup> Teachers told the Center for Human Rights in Iran that they were forced to stay inside when an incident occurred,<sup>556</sup> a report that is consistent with what we found in several of our cases and with the account of an ISNA reporter, who lamented when reporting on one of our cases that the Ministry of Education did not appear to have sent “the correct [...] instructions to administrators to deal with these incidents.”<sup>557</sup> Even in the official incident management manual distributed to schools, administrators were encouraged to avoid making “non-expert comments” about the poisonings, seemingly an instruction to avoid speaking about them at all.<sup>558</sup>

Other officials, including the Minister of Health and a university official, announced that masks should be made mandatory in schools to help prevent inhalation<sup>559</sup> and, where a child comes into contact with the toxin, they should change clothes, wash themselves, and drink fluids to flush the toxin.<sup>560</sup> However, it is not clear whether these instructions were ever provided formally to school administrators. We found limited follow-up reporting announcing mask mandates in school districts,<sup>561</sup> although it is notable that some girls are wearing masks in videos from our cases.

#### b. School Inspections and Closures

Only in Qom in February did we find information about school inspections and closures. On February 6, Qom officials announced that school would be closed for two days following the “serial poisoning of students” to investigate the causes of poisonings in schools or protect girls from subsequent incidents in the days after a poisoning incident.<sup>562</sup> Officials also reported that they visited 580 schools to fix or identify any issues with school facilities, such as sources of carbon monoxide leaks.<sup>563</sup> Yet as IRNA reports, the poisoning incidents continued despite these inspections, indicating that facility issues were not the cause.<sup>564</sup> By March, officials were determined to not close schools due to the poisonings. The Minister of Education even announced nationally that no schools would be closed due to reported poisoning incidents.<sup>565</sup> It

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<sup>555</sup> *Strange instructions to school administrators regarding student poisoning/prevent the news from being published in the media and ensure that no one leaves the school*, ARMAN MELI (Mar. 6, 2023).

<sup>556</sup> *Iran: School Girls Continue to Face Chemical Attacks, Officials Refuse to Provide Security*, CENTER FOR HUMAN RIGHTS IN IRAN (Apr. 24, 2023).

<sup>557</sup> *What was the cause of the student poisoning in Shahinshahr?* ISNA (Apr. 15, 2023) (Doc. 143\_27).

<sup>558</sup> *Hotline 1570 is ready to provide telephone counseling to families in recent school incidents*, TASNIM (Mar. 13, 2023).

<sup>559</sup> *Timeline of the student poisoning incident; everything everyone said from the beginning to today*, ETEMAD DAILY (Mar. 10, 2023).

<sup>560</sup> *The substance that caused the students' poisoning was not dangerous*, IRNA (Mar. 6, 2023).

<sup>561</sup> Several schools in Tehran, according to Ham-Mihan, did institute mask mandates. *The mystery of the unknown gas*, HAM-MIHAN (Mar. 4, 2023).

<sup>562</sup> *Serial poisoning of students closes Qom schools/61 students hospitalized today*, TASNIM (Feb. 6, 2023).

<sup>563</sup> *Scientific figures and equipment from the country were mobilized to discover the cause of the Qom school incident*, IRNA (Feb. 16, 2023).

<sup>564</sup> *Id.*

<sup>565</sup> *Education Minister: Schools will not be closed*, TASNIM (Mar. 5, 2023).



appears that several regions also instituted mandatory attendance<sup>566</sup> and prohibited staff from taking a leave of absence.<sup>567</sup>

### c. Subsequent Additional Security Measures in Schools

Intelligence and security officials were accused, initially, of not taking the issue seriously enough and providing security for schools.<sup>568</sup> Eventually, with rising attention on this issue, Sardar Montazer al-Mahdi, the spokesperson for the Police Command of the Islamic Republic of Iran, abbreviated as FARAJA in Persian,<sup>569</sup> told state-affiliated news reporters in early March that the “police have increased the number of special fixed and mobile patrols around schools and student dormitories.”<sup>570</sup> Nine days later, al-Mahdi told the public that FARAJA had created more than four thousand mounted and foot patrols that were surveilling all schools daily.<sup>571</sup> In addition to FARAJA, Deputy Minister of Interior Majid Mirahmadi announced on March 7 that the Basij was ready to provide assistance “to the extent required by [school] administrators,” including controlling schools’ exits and entries.<sup>572</sup>

Yet it appears that such measures were never fully implemented. Teachers and students interviewed by the Center for Human Rights in Iran said that their schools had not, in fact, been provided with security monitoring.<sup>573</sup> Instead, they explained that officials were preoccupied with information spreading about the poisonings, threatening students and teachers to stay silent about poisoning incidents.<sup>574</sup> Other government officials and state-affiliated news reporting indicates that contrary to FARAJA and the Basij’s assertions, schools may have simply been left on their own to ensure security. Instructions supposedly sent to school administrators placed administrators in charge of controlling school entry and exit points themselves,<sup>575</sup> and a member of Parliament’s Fact-Finding Working Group similarly assigned parents, students, teachers, and school administrators the task of preventing unauthorized people from entering schools.<sup>576</sup> A

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<sup>566</sup> See, e.g., *In-person activities in Hamadan schools/ Attending school is not optional*, ISNA (Mar. 12, 2023) (reporting that the Director General of Education in Hamedan said that school attendance is not optional and schools are remaining open).

<sup>567</sup> *Hotline 1570 is ready to provide telephone counseling to families in recent school incidents*, TASNIM (Mar. 13, 2023) (instructing schools to prohibit school staff from taking leaves of absence).

<sup>568</sup> See, e.g., *The causes and perpetrators of student poisoning should be introduced to the public*, ISNA (Mar. 1, 2023) (quoting MP for Tehran accusing security officials for failing to follow up and handle the security issues at schools).

<sup>569</sup> Some experts have described FARAJA as a national police unit responsible for surveillance, riot control, and national arrests. See, e.g., Maryam Sinaiee, ‘Repression bodies,’ *Inside the Iranian Security Apparatus Hit by Israel*, IRAN INT’L (June 27, 2025) <https://www.iranintl.com/en/202506276851>.

<sup>570</sup> *Increased special patrols around schools and dormitories/Arresting those responsible for poisoning students on the agenda*, ISNA (Mar. 6, 2023); *Establishing special and specialized fixed and mobile patrols around schools*, TASNIM (Mar. 6, 2023).

<sup>571</sup> *110 people arrested in connection with the “poisoning of students” case/ Stink bombs behind the events*, ISNA (Mar. 15, 2023).

<sup>572</sup> *Latest details on the investigation into student poisoning*, ISNA (Mar. 7, 2023).

<sup>573</sup> *Iran: School Girls Continue to Face Chemical Attacks, Officials Refuse to Provide Security*, CENTER FOR HUMAN RIGHTS IN IRAN (Apr. 24, 2023).

<sup>574</sup> *Id.*

<sup>575</sup> *Hotline 1570 is ready to provide telephone counseling to families in recent school incidents*, TASNIM (Mar. 13, 2023).

<sup>576</sup> *Rezazadeh: The main causes of student poisoning will be introduced in the next few days/School principals should be vigilant*, ISNA (Mar. 7, 2023).

school administrator in an unspecified school in Qom told ISNA in early March that they had undertaken several additional security measures themselves, like locking the doors and only taking meetings with parents outside, but did not mention any protective measures provided by regional or national security apparatuses;<sup>577</sup> a similar situation was reported in schools in Tehran.<sup>578</sup> Calls for “human chains” to be formed around schools in late April by the Coordinating Council of Teachers’ Unions, along with photos published on social media that were reported to depict mothers sitting outside of a school in Zanzan, further cast doubt on whether security officials ever took action to provide enhanced protection to schools around the country.<sup>579</sup> In addition, local officials instructed schools to ensure video monitoring equipment was set up around the schools,<sup>580</sup> as did a manual allegedly distributed to school administrators,<sup>581</sup> again indicating that schools were responsible for enhancing their own security. Even the Ministry of Intelligence, when asserting it had dispatched security patrols that conducted surveillance and gathered information in unspecified “target environments,” purportedly in response to the poisoning incidents,<sup>582</sup> did not mention these security patrols being used to protect schools. This aligns with evidence from one of our cases on April 10, in which security measures, including police patrols, do not appear to have been present despite the fact that the school had experienced a poisoning incident five weeks earlier.<sup>583</sup>

Thus, rather than mobilizing the country’s significant security apparatus to protect schools from further incidents, it appears that Iranian officials largely left it to schools to figure it out themselves.

## 2. Official Investigations Pursued and Results Announced

In addition to protective measures, we looked at official investigations launched into the poisonings. There were at least six different investigations were initiated to uncover the cause of the poisonings and identify the perpetrators. Details about these investigations, along with what they uncovered, are detailed below.

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<sup>577</sup> *"Poisoning Incident" From Anxiety and Delusions to Lack of Work / Briefing Sessions for Teachers to Be Held*, ISNA (Mar. 3, 2023).

<sup>578</sup> See *The mystery of the unknown gas*, HAM-MIHAN (Mar. 4, 2023) (reporting that several girls’ schools in Tehran implemented their own protective and security measures, although the article also reported that police officers were “being assigned” to guard schools. It is unclear whether this was at the schools’ request or whether this was part of a city-wide mandate, although it came before FARAJA’s announcement so was separate from the national claims).

<sup>579</sup> *Chain poisoning continues in Karaj, Hamedan, and Sanandaj; students and two teachers transferred to hospital and proposal to form a “Student Protection Committee,”* BBC PERSIAN (Apr. 24, 2023)

<https://www.bbc.com/persian/articles/clelg3dny66o>; see also *Cyberspace users' suggestion: If necessary, we will form a human chain around schools*, ETEMAD DAILY (Mar. 2, 2023) (reporting that after several poisoning incidents were reported, Twitter users called for the creation of human chains to protect girls’ schools).

<sup>580</sup> *Students' families should remain calm and avoid paying attention to rumors*, IRNA (Mar. 5, 2023) (reporting that Mohammad Rahimi, Director General of Passive Defense at Ilam Governor’s Office, instructed schools and universities in Ilam to make sure their facilities were equipped with CCTV cameras).

<sup>581</sup> *Hotline 1570 is ready to provide telephone counseling to families in recent school incidents*, TASNIM (Mar. 13, 2023).

<sup>582</sup> *Ministry of Intelligence's explanatory statement regarding school incidents in the country*, ISNA (Apr. 28, 2023).

<sup>583</sup> See *supra* Part I (describing the case at Sadr Girls’ High School in Karaj, Alborz Province).

a. Qom Authorities' Investigations

Early investigations were focused on Qom. According to an official from Qom's Public Relations department, in an interview with IRNA, Qom officials had taken students' blood samples, exhaled breath samples, digestive samples, and environmental samples, which were all then subjected to "various tests," although nothing "unusual" was identified in the samples sent.<sup>584</sup> The official stated that after each incident, "several sets of samples were carefully taken from the air, different surfaces, the school's water, food, etc., and sent to various advanced laboratories in the country ... to identify the cause."<sup>585</sup>

Meanwhile, the Qom Public and Revolutionary Prosecutor's Office reported to have received a complaint filed by thirty families about the poisonings in Qom, and also began investigating.<sup>586</sup> In addition to the Public and Revolutionary Prosecutor, the Qom Prosecutor was also reaffirmed as the lead investigator for the poisonings.<sup>587</sup> It's unclear if these were two separate investigations or if the different officials were collaborating on a single investigation.

Results:

On February 28, the president of Qom University of Medical Sciences was reported to have presented findings about Qom officials' investigations to the Ministers of health, education, and intelligence, asserting that the poisoned students "suffered from mild poisoning" from "gaseous toxins," with short-lasting effects, and reaffirming that "there is no doubt that poisoning occurred."<sup>588</sup>

Beyond these findings, though, Qom officials provided limited information to the public. By the end of February, nearly three months after this incident, the domestic news outlet Etemad Daily reported that Qom officials continued to provide vague responses to journalists' requests and refused to publish the toxicology results of tests conducted on the collected samples.<sup>589</sup> Nor had Qom's prosecutor's office made any investigation results public, despite these incidents starting three months earlier.<sup>590</sup> On March 1, the deputy head of Parliament's Health Commission finally announced that several types of gases had caused the students' poisonings in Qom, and it was unlikely nitrogen gas was involved.<sup>591</sup> Some officials appeared frustrated with the lack of clear

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<sup>584</sup> *Scientific figures and equipment from the country were mobilized to discover the cause of the Qom school incident*, IRNA (Feb. 16, 2023).

<sup>585</sup> *Id.*; see also *Video | Specialized equipment for collecting air samples from the affected schools in Qom*, IRNA (Feb. 17, 2023) (asserting that samples were gathered in Qom "in accordance with international standards").

<sup>586</sup> *Serial poisoning of students: from facts to follow-ups*, IRNA (Feb. 22, 2023); see also *Special mission from the Attorney General to the Qom Prosecutor's Office to follow up on poisoning in Qom schools*, IRNA (Feb. 20, 2023) (reporting that the Attorney General assigned the Qom Public and Revolutionary Prosecutor to investigate, explaining that the news "indicate[s] the possibility of intentional criminal acts that are noteworthy and require careful follow-up").

<sup>587</sup> *Poisonings that are found to be intentional*, ETEMAD DAILY (reprinted in Akharin Khabar) (Feb. 28, 2023) (reporting that Mohammad Mosaddeq, First Deputy of the Judiciary, reaffirmed that the Qom prosecutor was the "officer to follow up on the poisoning of students").

<sup>588</sup> *Continuing series on student poisoning/this time in Tehran*, ISNA (Feb. 28, 2023); *Sheikhi: The exact cause of the poisoning of Qomi students has not yet been determined*, TASNIM (Feb. 28, 2023).

<sup>589</sup> *Poisonings that are found to be intentional*, ETEMAD DAILY (reprinted in Akharin Khabar) (Feb. 28, 2023).

<sup>590</sup> *Id.*

<sup>591</sup> *The Story of Serial Poisonings, Roots and Possibilities*, IRNA (Mar. 1, 2023). Other external sources confirm that nitrogen gas is highly unlikely to have been involved in the poisoning incidents. See *N2 Gas Was Present in the*

progress. The MP for Tehran Mohsen Pirhadi told ISNA on the same day that “some officials failed to follow up and deal with the factors disrupting student safety in schools” and called the current situation “intolerable,” presumably a comment at least partially targeted at Qom officials.<sup>592</sup> No other details were provided though, including specifying what types of gases might have been involved or toxicology reports to support various announcements by officials.

#### b. Ministry of Health

Around mid-February, cabinet officials and their ministries began getting involved. On February 17, The Deputy Minister of Health appointed Dr. Bahram Einollah, Deputy Minister of Health, Treatment, and Medical Education, to investigate the poisonings and to identify a committee of experts to be on site.<sup>593</sup> The Ministry of Health claimed that its investigatory committee included “30 of the best scientists related to this field, including experts in toxicology, environmental health, lung science, microbiology, infectious diseases,” and other disciplines.<sup>594</sup> The Ministry explained that these experts traveled around Iran and “inspected schools, conducted tests, visited patients, and reviewed all documents.”<sup>595</sup> After announcing initial test results, Deputy Health Minister Dr. Saeed Karimi, an ophthalmologist, said that the team had samples of the toxic agent and that tests, while initially showing positive results for an unnamed toxic agent, needed to be re-run and checked again.<sup>596</sup>

#### Results:

On February 26, a Deputy Minister of Health announced that “so far it has been determined that the chemical compounds are not war-related and do not show any signs of being contagious,” and that “it is clear that these poisonings are not of a viral or microbial origin and their side effects were transient.”<sup>597</sup> He also said, controversially and cryptically, that “it became clear that some people wanted all schools, especially girls’ schools, to be closed.”<sup>598</sup> Two days later, the Minister of Health said that “a very mild poison caused mild poisoning in the students ... details of the type of poison and its possible subsequent complications will be published in the future.”<sup>599</sup> It is unclear on what basis the Minister made this conclusion. Tasnim, meanwhile, claimed that the Ministry of Health had attributed most of the incidents to students’ fear, and that despite repeated testing, “no scientifically reliable results have been obtained,”<sup>600</sup> although this claim appears to be false.

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*Poison Released in Schools: False*, FACTNAMEH (Mar. 2, 2023). In addition, other experts around this time noted that they, too, believed it might be a combination of gases. See, e.g., *The mystery of the unknown gas*, HAM-MIHAN (Mar. 4, 2023) (quoting an ICU specialist, who told the news outlet that it appeared to him that the girls were being poisoned by a “combination of gases” that were not easily accessible to the public).

<sup>592</sup> *The causes and perpetrators of student poisoning should be introduced to the public*, ISNA (Mar. 1, 2023).

<sup>593</sup> *Deputy Health Minister appointed to investigate Qom students' poisoning*, IRIB (Feb. 17, 2023).

<sup>594</sup> *The substance that caused the students' poisoning was not dangerous*, IRNA (Mar. 6, 2023).

<sup>595</sup> *Id.*

<sup>596</sup> *Id.*

<sup>597</sup> *Deputy Minister of Health: Qomi students' poisoning was caused by available chemical compounds*, IRNA (Feb. 26, 2023).

<sup>598</sup> *Id.* See Section II.B for discussion about this official’s sudden reversal of this statement.

<sup>599</sup> *Continuing series on student poisoning/this time in Tehran*, ISNA (Feb. 28, 2023).

<sup>600</sup> *Poisoning of students in schools/Family concerns and strange silence from responsible agencies*, TASNIM (Feb. 28, 2023).

On March 6, Deputy Minister Karimi announced further findings from the Ministry's ongoing investigation. Karimi explained that the toxin was inhaled and generally caused respiratory irritation, causing symptoms such as "burning throat, cough, shortness of breath, tearfulness, stomach pain, weakness, lethargy, and numbness of limbs."<sup>601</sup> Most children who were exposed, he claimed, were discharged within six hours of hospitalization.<sup>602</sup> He also explained that the toxic agent reduced antioxidants, which was causing the lethargy, weakness, and limb numbness, although he argued these symptoms were transient.<sup>603</sup> He asserted further that, according to the group's studies, "less than 10 percent of affected children actually encountered a [toxin]."<sup>604</sup> A large number of children saw someone with signs of "irritation" and then began experiencing the same symptoms because they felt anxious.<sup>605</sup> Finally, he explained that similar incidents have happened in other countries and were unintentional errors, a gesture possibly made to try to explain the incidents away as accidents.<sup>606</sup>

Two days later, on March 8, a lung doctor who was a member of the Ministry's investigative team told Tasnim that "it was clear from the very beginning that we were dealing with a stimulant substance" that "affects the blood."<sup>607</sup> He confirmed the Ministry of Interior's numbers (see below), saying that only "about 5 percent of students" were exposed to the stimulant.<sup>608</sup>

The Ministry didn't provide another update for a month. Finally, on April 9, Dr. Saeed Karimi told the public that "for now, the results haven't changed," although he did point out that "emotional and stress factors" were a part of the students' issues.<sup>609</sup> Five days later, Dr. Bahram Einollah repeated the Ministry's earlier findings, restating that "in over 90% of cases, no poisoning or toxicity was observed," and that the girls' symptoms were caused by anxiety.<sup>610</sup> In a small percentage of cases, he explained, "some students became ill as a result of student mischief."<sup>611</sup> He affirmed that the Ministry of Health's findings once again aligned with those of the Ministry of Interior.<sup>612</sup> (The Ministry of Interior's investigation is discussed below). No supporting evidence was provided for these claims, including toxicology reports.

### c. Ministry of Interior

On March 1, 2023, then-President Ibrahim Raisi instructed the Minister of Interior to "find the root cause of the issue ... and to provide documented and continuous information about the results of the follow-up to alleviate families' concerns."<sup>613</sup> He instructed the Ministry to cooperate with other relevant ministries, including the Ministries of Intelligence and Health, but

<sup>601</sup> [\*The substance that caused the students' poisoning was not dangerous\*](#), IRNA (Mar. 6, 2023).

<sup>602</sup> *Id.*

<sup>603</sup> *Id.*

<sup>604</sup> *Id.*

<sup>605</sup> *Id.*

<sup>606</sup> *Id.*

<sup>607</sup> [\*The use of "toxic" and "deadly" substances in schools is prohibited\*](#), TASNIM (Mar. 8, 2023).

<sup>608</sup> *Id.*

<sup>609</sup> [\*Latest news from the investigation of "Serial Poisoning in Schools" by the Ministry of Health's Scientific Committee\*](#), ISNA (Apr. 9, 2023).

<sup>610</sup> [\*New report from the Minister of Health on student poisoning/Anxiety and mischief are the cause of more than 90 percent of ill health\*](#), ISNA (Apr. 14, 2023).

<sup>611</sup> *Id.*

<sup>612</sup> *Id.*

<sup>613</sup> [\*Poisonings that are found to be intentional\*](#), ETEMAD DAILY (Mar. 1, 2023) (reprinted in Akharin Khabar);



for communication to come through the Interior Ministry.<sup>614</sup> That same day, the Minister of Interior promised that the Ministry was “mobilizing relevant agencies” and would inform the public of any updates.<sup>615</sup> The Ministry was reported to have held an initial coordination meeting with the Ministries of Health and Education, which had previously been investigating.<sup>616</sup> According to Majid Mirahmadi, the Deputy Minister of Security and Law Enforcement in the Ministry of Interior, the investigations included “using all of the country’s scientific capacities and the country’s most advanced laboratories.”<sup>617</sup>

#### Results:

On March 7, Majid Mirahmadi, the Deputy Minister of Security and Law Enforcement in the Ministry of Interior, announced that they had found “no toxic substances or poisoning caused by toxic substances so far,”<sup>618</sup> reaffirming a statement given by Interior Minister Ahmad Vahidi in which he asserted that the vast majority of poisonings were caused by student stress.<sup>619</sup> Mirahmadi explained that “95% of people who expressed discomfort” were unwell due to stress.<sup>620</sup> The remaining 5% of students were affected by an “irritating chemical,” but he did not name the chemical.<sup>621</sup>

Then, on March 11, the Ministry published additional results. The Ministry claimed that more than 100 people had been identified as perpetrators.<sup>622</sup> Based on the alleged arrests of these individuals, the Ministry claimed that a number of the poisoning cases involved people who, “out of mischief or adventure, took actions such as using smelly and harmless substances [...] with the aim of closing classes,” along with people with “hostile motives” hoping to “creat[e] fear and terror among the parents and students, and to close schools.”<sup>623</sup>

#### d. Ministry of Intelligence

On March 8, 2023, the Ministry of Intelligence published a statement informing the public that the Ministry had also been investigating the poisonings, although it had not yet figured out what was going on in all cases.<sup>624</sup> Given this, the Ministry said that no information would be announced until the findings could be “generalized” across all cases.<sup>625</sup> Later, when the Ministry provided the public with its results, it claimed to have mobilized its “intelligence, security, technical, operational, and laboratory capabilities” for its investigation.<sup>626</sup> The Ministry further

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<sup>614</sup> *President's mission to the Minister of Interior to follow up on serial poisonings in some schools*, ISNA (Mar. 1, 2023).

<sup>615</sup> *Vahidi: No one has been arrested in connection with the poisoning of students/Security forces are busy searching for clues*, TASNIM (Mar. 1, 2023).

<sup>616</sup> *President announces authority to investigate student poisoning*, TASNIM (Mar. 1, 2023).

<sup>617</sup> *Latest details on the investigation into student poisoning*, ISNA (Mar. 7, 2023).

<sup>618</sup> *Latest details on the investigation into student poisoning*, ISNA (Mar. 7, 2023).

<sup>619</sup> *Vahidi: No one has been arrested in connection with the poisoning of students/Security forces are busy searching for clues*, TASNIM (Mar. 1, 2023).

<sup>620</sup> *Id.*

<sup>621</sup> *Deputy Interior Ministry Security Minister: Arrested individuals are not school staff*, IRNA (Mar. 7, 2023).

<sup>622</sup> *The number of school incidents has decreased/students should not be absent*, ISNA (Mar. 11, 2023).

<sup>623</sup> *Id.*

<sup>624</sup> *Ministry of Intelligence statement on poisoning of students in a number of schools*, ISNA (Mar. 8, 2023).

<sup>625</sup> *Id.*

<sup>626</sup> See *Ministry of Intelligence's explanatory statement regarding school incidents in the country*, ISNA (Apr. 28, 2023).

claimed that it had applied “comprehensive” surveillance and monitoring in its investigation, and obtained evidence from “target environments,” although exactly what – or whom – these targets were is not clear.<sup>627</sup> The Ministry also claimed to have obtained the samples analyzed by the Ministry of Health and examined these samples using their own special laboratories, as well as those of the IRGC.<sup>628</sup>

#### Results:

On April 28, the Ministry of Intelligence published a statement detailing the results of its investigation. In the statement, the Ministry claimed there were five different causes: stink bombs; tear gas or pepper spray; odors surrounding the school like gas leaks or burning waste; people trying to create insecurity by causing these incidents and then filming them for hostile Persian-language media; and mass hysteria.<sup>629</sup> No toxic substance capable of causing poisoning was observed, according to both field investigations and laboratory assessments, and the average length of stays in health clinics was just two hours, while only a small number of students were hospitalized.<sup>630</sup> Instead, non-toxic agents were responsible for causing panic, and mass hysteria played a significant role.<sup>631</sup> According to the statement, teaching staff were not affected in almost every case, further indicating that these were not cases of poisonings from toxic agents.<sup>632</sup> The Ministry also pointed to alleged evidence claiming that foreign adversaries could have been responsible, devising a plan to prevent students from attending school in order to provoke parents to protest and make it appear as if the regime was responsible.<sup>633</sup>

#### e. Parliamentary Fact-Finding Working Group

Sometime in February 2023, the Health and Medical Commission was reported to have held a meeting about the student poisonings.<sup>634</sup> However, that group was reported to have failed to meet regularly or produce any reports.<sup>635</sup> In response to this, the speaker of Parliament announced the first week of March the formation of a Parliamentary Fact-Finding Working Group on the issue and appointed four commission heads to lead the working group: education, national security, internal affairs, and health.<sup>636</sup> Several days later, IRNA reported that this group also included security and law enforcement agencies, along with “specialized laboratories” around the country.<sup>637</sup>

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<sup>627</sup> *Id.*

<sup>628</sup> *Id.*

<sup>629</sup> *Id.*

<sup>630</sup> *Id.*

<sup>631</sup> *Id.*

<sup>632</sup> *Id.*

<sup>633</sup> *Id.*

<sup>634</sup> See [\*Continuing series on student poisoning/this time in Tehran\*](#), ISNA (Feb. 28, 2023) (discussing a meeting by the health and education commissions on the topic).

<sup>635</sup> [\*Strange instructions to school administrators regarding student poisoning/prevent the news from being published in the media and ensure that no one leaves the school\*](#), ARMAN MELI (Mar. 6, 2023).

<sup>636</sup> [\*Strange instructions to school administrators regarding student poisoning/prevent the news from being published in the media and ensure that no one leaves the school\*](#), ARMAN MELI (Mar. 6, 2023).

<sup>637</sup> [\*Forming a working group to investigate recent incidents in some schools by order of the President\*](#), IRNA (Mar. 6, 2023).

On March 5, the Working Group held its first meeting, but few details were released about what was discussed.<sup>638</sup> The meeting was reported to have included representatives from IRGC intelligence as well as from the Ministries of Intelligence, Interior, Health, Education, and police intelligence.<sup>639</sup> Mohammad Hassan Asaferi, a member of the Working Group, told ISNA that “various tests are being conducted to identify the type of poisoning and determine the cause,” but “so far, no specific information has been obtained” to help explain either of these two questions.<sup>640</sup> He said the Working Group was waiting on the Ministry of Health to provide toxicology results.<sup>641</sup> A day later, Yaqoub Rezazadeh, a member of the National Security Commission and someone who had taken part in the Working Group, told ISNA reporters that “the incidents were caused by very minor factors that were not toxic and had a very small impact.”<sup>642</sup> He assured reporters that field investigations would be conducted.<sup>643</sup>

In total, the committee was reported to have met twice before the end of the Persian year, and then twice in the new Persian Year, once on April 5 and then again two weeks later.<sup>644</sup>

### Results:

On February 28, the head of the Education Commission in Parliament, in a meeting with the Health and Education Ministers and representatives from the Ministry of Intelligence, announced that “based on test results, N2 (ammonia) gas was present in the poison released in schools, which will be immediately eliminated in the body ... which is why it is difficult to detect.”<sup>645</sup> MP Mohammad Hassan Asaferi, a member of the Working Group, then undermined this claim a week later, explaining that although they were still confirming the results, and the poisonings seemed instead to be caused by varied gases rather than the same one.<sup>646</sup>

On March 14, Asafari made another announcement about the Working Group’s findings, telling the public that “some of the poisonings were caused by naphthalene and also by rice tablets.”<sup>647</sup> Based on the more than 100 people that were allegedly arrested, as announced by the Ministry of Interior several days earlier, he explained that “some of the incidents were due to students who wanted to close the schools early. [Others] were targeted and intentional.”<sup>648</sup> Then, on March 17, a member of the Working Group who identified himself as a doctor said that based on blood sample analyses from affected students in Qom and Tehran, “a series of chemicals has been

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<sup>638</sup> *The board of directors of the special working group to investigate the causes of student poisoning was appointed*, ISNA (Mar. 5, 2023).

<sup>639</sup> *New details about the causes of student poisoning*, ISNA (Mar. 6, 2023).

<sup>640</sup> *New details about the causes of student poisoning*, ISNA (Mar. 6, 2023).

<sup>641</sup> *New details about the causes of student poisoning*, ISNA (Mar. 6, 2023).

<sup>642</sup> *Rezazadeh: The main causes of student poisoning will be introduced in the next few days/School principals should be vigilant*, ISNA (Mar. 7, 2023).

<sup>643</sup> *Id.*

<sup>644</sup> *Recent school incidents were caused by students' mischief*, PARS NEWS (Apr. 11, 2023).

<sup>645</sup> *The Story of Serial Poisonings, Roots and Possibilities*, IRNA (Mar. 1, 2023) (quoting Alireza Monadi on February 28). As discussed above, note that not all sources reported this quote as ammonia. Other articles simply reported it as “N2,” and it is unclear if this meant nitrogen or a different gas. See, e.g., *Release of N<sub>2</sub> gas was the cause of the students' poisoning*, IRNA (Feb. 28, 2023) (Doc. 257\_38).

<sup>646</sup> *New details about the causes of student poisoning*, ISNA (Mar. 6, 2023).

<sup>647</sup> *Asferi: The main culprits behind the students' poisoning have not yet been arrested*, ISNA (Mar. 14, 2023).

<sup>648</sup> *Asferi: The main culprits behind the students' poisoning have not yet been arrested*, ISNA (Mar. 14, 2023).

discovered,” and that while anxiety and stress may be present among some students, “hysterics are not the main cause of the poisonings.”<sup>649</sup>

The Working Group was then silent for a month (perhaps due to the start of the new Persian year). On April 10, ISNA published an interview with Working Group member MP Asaferi about the prospects of ongoing investigations. Asaferi told ISNA that, remarkably, the “security agencies have not yet been able to obtain the main clues concerning the poisonings”<sup>650</sup> and he accused security agencies of not making enough of an effort to investigate. He called on security agencies to not abandon investigations just because they thought all of this happened due to student mischief. In a strong statement, he told ISNA that “simply saying that the cause of the poisonings was the smell of toy balloons is not acceptable to the committee.”<sup>651</sup> Given the new cases that had occurred after mid-March, he said further, clearly those arrested last Persian year were not the main source of the poisonings.<sup>652</sup>

Finally, on June 11, the Parliamentary Working Group finalized its report on the poisonings and submitted it to the Speaker of Parliament.<sup>653</sup> In a summary of the report, Kazemi told reporters from IRNA that the Group had found that “some people acted maliciously,” using stink bombs to poison the students.<sup>654</sup> Another Committee member told Parliament that people were behind the scenes directing the poisoning incidents and they had already been identified and arrested by the security apparatus.<sup>655</sup> The Working Group’s report was never made public.

#### f. Other Investigations

Several other entities also announced their own investigations into the school poisonings. Some of these were local prosecutor’s offices, which announced that a special branch would pursue their own investigations of the incidents in their provinces.<sup>656</sup> The head of the National Passive Defense Organization also announced that special teams had been collecting samples from the scene and conducting tests on students, but could not find “verifiable clues indicating the poisoning agent, and the few samples that were obtained were inconclusive.”<sup>657</sup> He assured the

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<sup>649</sup> [\*26 provinces and 245 schools were involved in the poisoning/security forces were unable to find any foreign agents/they covered up the issue\*](#), ROUYDAD24 (Mar. 17, 2023).

<sup>650</sup> [\*It is unacceptable to say that the cause of the students' poisoning was balloons\*](#), MOSTAGHAL (Apr. 11, 2023).

<sup>651</sup> *Id.*

<sup>652</sup> [\*It is unacceptable to say that the cause of the students' poisoning was balloons\*](#), MOSTAGHAL (Apr. 11, 2023).

Tasnim reported Asaferi’s statements very differently, omitting Asaferi’s statements about the security agencies and blaming the lack of information on the committee itself. [\*The latest details of the fact-finding working group on the plight of students: when will the final report be announced?\*](#) TASNIM (Apr. 10, 2023)

<sup>653</sup> [\*Final report on student poisoning submitted to Parliament Speaker\*](#), IRNA (June 11, 2023).

<sup>654</sup> *Id.*

<sup>655</sup> *Id.*

<sup>656</sup> See, e.g., [\*Political News March 1-3; Reactions to Poisoning in Some Schools/Pedagogues in Tehran\*](#), ISNA (Mar. 3, 2023) (Tehran Prosecutor’s Office announcing special investigative branch for the poisonings); [\*Decisive action against factors that poison students\*](#), ISNA (Mar. 7, 2023) (Mazandaran Chief Justice announces that prosecutors across the province have been tasked and assigned in cooperation with education and security authorities to identify the perpetrators); [\*Designation of a special representative to follow up on the poisoning of Qazvin students\*](#), IRIB (Mar. 10, 2023) (Public and Revolutionary Prosecutor of Qazvin, Hossein Rajabi, announced a special representative from the prosecutor’s office was appointed to follow up on the poisonings and monitor, identify, and arrest possible perpetrators).

<sup>657</sup> [\*Sardar Jalali: Poisonings are caused by direct intervention of the current of hypocrisy and hostility\*](#), ISNA (Mar. 5, 2023).

public that identifying perpetrators was the “top priority for all intelligence and security agencies.”<sup>658</sup>

In addition, the police command of the Islamic Republic of Iran, abbreviated as FARAJA in Persian, also claimed to have been investigating the issue. At the end of February 2023, FARAJA announced that it had launched “investigations to discover the origin and goal” of the poisonings and were in the process of identifying possible suspects.<sup>659</sup> Brigadier General Ahmad Reza Radan, then-head of FARAJA, said that the organization was investigating alongside “colleagues in intelligence and other agencies.”<sup>660</sup> At that time, he said it was too early to make a judgment yet about whether the incidents were intentional.<sup>661</sup>

#### Results:

Of these other investigations, we found results only from FARAJA’s investigation. In mid-March, the spokesperson for the police, Brigadier General Montazer al-Mahdi, announced that “the majority of [poisoning] incidents” were influenced by psychological factors [...] the students’ anxiety and the use of stink bombs and similar items are also main causes of [these] incidents.”<sup>662</sup> He claimed that 9,000 stink bombs had been collected to prevent further incidents.<sup>663</sup>

#### g. Final Investigation Results

From all of these investigations, it appears that the Ministry of Intelligence’s statement and the Parliamentary Working Group’s report, alongside the Ministry of Health’s purported findings and the Ministry of Interior’s announcements, stand as the state’s final investigation results. Importantly, key components of these findings were never made public, including Parliament’s report and any toxicology analyses. In any case, taken together, we interpret the results for the investigations as the following:

- The vast majority of girls’ symptoms were caused by mass hysteria. The Ministries of Health and Interior claim that between 90%-95% of the students who experienced symptoms were affected by mass hysteria, not a chemical agent.
- For the minority of incidents not caused by mass hysteria, no toxic agent was used. Instead, “non-toxic agents” such as stink bombs, pepper spray, or tear gas were used to caused panic.
- Where these non-toxic agents were used, they were used by:
  - students for mischief and to get out of class
  - people trying to stoke insecurity and provoke protests (possibly foreign agents)

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<sup>658</sup> *Id.*

<sup>659</sup> *Continuing series on student poisoning/this time in Tehran*, ISNA (Feb. 28, 2023).

<sup>660</sup> *Exclusive | Police involvement in student poisoning case*, TASNIM (Feb. 28, 2023).

<sup>661</sup> *Id.*

<sup>662</sup> *110 people arrested in connection with the "poisoning of students" case/ Stink bugs behind the events*, ISNA (Mar. 15, 2023).

<sup>663</sup> *Id.*



### 3. Arrests

Officials announced several rounds of arrests related to the poisonings between March and June, although not all of them were alleged perpetrators. Officials arrested alleged perpetrators in three large batches, claiming each time that they had identified a network of perpetrators responsible for the poisonings. Several of those arrested and accused of causing the poisonings were students. Yet there were scant details and sometimes contradictory information about who was arrested and where, and it is not clear on what evidentiary basis all of these people were arrested. The lack of information about perpetrator arrests casts doubt on whether officials ever arrested the perpetrators at all. We found no information about whether any of these people arrested in large batches ever faced a trial in a court of law under due process.

In addition to alleged perpetrators, officials arrested at several students for causing unrest, charged three domestic news outlets for spreading lies related to the poisoning incidents, and arrested at least nine individuals for sharing information, often via social media, about the poisonings. By August 2023, the U.N. International Independent Fact-Finding Mission for Iran (hereinafter FFMI) reported that 48 court cases had been filed across eight provinces against individuals arrested for spreading rumors, encouraging protests or school closures, or otherwise causing fear in relation to the poisonings.<sup>664</sup>

#### a. Perpetrators

State media, along with parliamentary members, initially claimed that several people had been arrested in connection with the poisoning incidents in late February.<sup>665</sup> However, this claim appears to have been false information as it was denied by the chief of police Sardar Radan, who then assured the public that the Ministry of Intelligence was working to arrest the perpetrators responsible.<sup>666</sup>

Six days later, a Deputy Interior Minister announced that several people had been arrested in connection with the poisonings across five provinces. The Ministry made three separate announcements, each contradicting details in earlier statements, going back and forth between the number of provinces in which arrests had purportedly been made (five vs. six), so it is unclear if or precisely where arrests were made.<sup>667</sup> In the final statement, the Ministry of Interior claimed that the six provinces in which arrests were made include: Alborz, Fars, Kermanshah, Khorasan, Khouzestan, and West Azerbaijan.<sup>668</sup>

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<sup>664</sup> The FFMI did not indicate whether any individuals were arrested for carrying out the poisoning incidents against schools.

<sup>665</sup> See [Sardar Radan denied the news from Fars News Agency / No one has been arrested so far / It is not clear whether the incident was intentional or unintentional](#), SHARGH DAILY (Mar. 1, 2023); see also [A meeting of the parliamentary fact-finding working group was held regarding the poisoning of students](#), IRNA (Mar. 2, 2023) (reporting that Hamidreza Kazemi, a member of the parliamentary working group, told reporters that based on the reports presented to the group, a number of perpetrators were arrested).

<sup>666</sup> [Sardar Radan denied the news from Fars News Agency / No one has been arrested so far / It is not clear whether the incident was intentional or unintentional](#), SHARGH DAILY (Mar. 1, 2023).

<sup>667</sup> See [Several people arrested in 5 provinces over poisonings](#), ISNA (Mar. 7, 2023); [Identification of perpetrators of student poisoning continues](#), ISNA (Mar. 7, 2023); [Arrests of people linked to student poisoning in 6 provinces](#), ISNA (Mar. 7, 2023).

<sup>668</sup> [Arrests of people linked to student poisoning in 6 provinces](#), ISNA (Mar. 7, 2023).

The Ministry claimed that three of those arrested had a criminal record including “activity in the recent unrest,” and have connections to “hostile foreign media outlets” which played a “prominent role in their arrest.”<sup>669</sup> One of the arrested individuals, the Ministry said, was arrested for taking videos in the school and hospital because they were seeking to “exploit the scenario and create fear and anxiety.”<sup>670</sup> Another person was arrested, according to IRNA, because he spread stimulants through the school using his child and planned to film and send these videos to hostile media after some of the students became unwell, to stoke domestic unrest in Iran.<sup>671</sup> No further details were provided about who was arrested or what evidence was used to justify their arrest, other than the fact that none of those arrested were school staff members.<sup>672</sup> Confusingly, the head of the General Inspection Organization, an administrative body in the judiciary branch responsible for overseeing transparency and integrity within the government, claimed that “no one has been arrested so far,” raising suspicions as to whether any perpetrators had been arrested at all by this time.<sup>673</sup> At minimum though, based on the information provided, it appears that the alleged “perpetrators” claimed to have been arrested were not actually perpetrators but were people in Iran trying to share information about the poisoning incidents.

On March 7, several other officials from different governmental organizations also announced arrests (it is unclear whether these arrests were separate from those announced by the Ministry of Interior). The Deputy Head of Cultural and Social Affairs of the North Khorasan Provincial Police Command announced that the police had arrested a shopkeeper who sold the responsible student materials for the poisonings of students at a school in Bojnourd.<sup>674</sup> And the spokesperson for the Iranian police, Brigadier General Montazer al-Mahdi, said that five people had been arrested in Larestan, two men and three women.<sup>675</sup> Al-Mahdi claimed that these people worked as a team by throwing nitrogen gas into several schools and poisoning 53 students.<sup>676</sup> The three women had allegedly filmed themselves and sent these videos to hostile networks including Iran International.<sup>677</sup> Iran Wire reported that all three women were students at a local art school.<sup>678</sup>

On March 11, the Ministry of Interior ramped up its alleged arrests, claiming to have arrested more than 100 people who were responsible for carrying out recent poisoning incidents.<sup>679</sup> The Ministry claimed that the arrestees fell into two categories: those who were just mischievous and trying to cancel class using harmless substances, and those trying to create terror among parents

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<sup>669</sup> *Id.*

<sup>670</sup> *Id.*

<sup>671</sup> [\*Three of those arrested have criminal records, including involvement in recent riots\*](#), IRNA (Mar. 7, 2023).

<sup>672</sup> [\*Latest details on the investigation into student poisoning\*](#), ISNA (Mar. 7, 2023).

<sup>673</sup> [\*Inspection agency enters into the issue of serial poisoning of students / No one has been arrested so far\*](#), ISNA (Mar. 7, 2023).

<sup>674</sup> [\*One person arrested in connection with poisoning of students at a Bojnourd school\*](#), ISNA (Mar. 7, 2023); [\*One person arrested in connection with poisoning of North Khorasan students\*](#), IRNA (Mar. 7, 2023).

<sup>675</sup> [\*Arrest of perpetrators of nitrogen gas attack on 7 schools\*](#), ISNA (Mar. 7, 2023).

<sup>676</sup> *Id.*

<sup>677</sup> *Id.*

<sup>678</sup> [\*Who are the citizens who have been arrested as perpetrators of school poisoning?\*](#) IRANWIRE (Apr. 23, 2023).

<sup>679</sup> [\*The number of school incidents has decreased/students should not be absent\*](#), ISNA (Mar. 11, 2023). Several days later, the spokesman for FARAHA also announced that FARAHA had arrested 110 perpetrators. [\*Likely, the two groups are the same. 110 people arrested in connection with the "poisoning of students" case/ Stink bugs behind the events\*](#), ISNA (Mar. 15, 2023).

and students, close schools, and ignite distrust of the government.<sup>680</sup> Mohammad Asaferi, a member of the Parliamentary Working Group, explained further that some of those arrested “played a role in the riots a few months ago,” and others were “related to elements of foreign intelligence services.”<sup>681</sup> No other details about those arrested, including their names, which incidents they were responsible for, or the evidence used to arrest them, were provided. Three days later, a member of the parliamentary working group investigating the poisonings said those arrested were not “the main perpetrators.”<sup>682</sup>

Finally, on June 11, Parliament announced that the perpetrators had all been identified and arrested by the nation’s security apparatus.<sup>683</sup> Several weeks later Morteza Mahmoudvand, an MP from Khorramabad, told an Iran-based news outlet that hundreds of additional people had been arrested in connection with the poisonings under “direct orders from the leadership,” and said that the poisonings incidents were not the students’ fault.<sup>684</sup> Instead, he said that it was caused by a “deviationist” group that had infiltrated the schools and was responsible.<sup>685</sup> Once again, however, there were few details about those arrested, including who they were, on what evidentiary basis they were arrested and for which incidents they were responsible. Nor did we ever find any information about whether any of these persons were ever tried in a court of law.

#### b. Students

Officials also arrested students they blamed for perpetrating poisoning incidents. As mentioned above, during the first week of March, three teenagers were arrested in Larestan, Fars Province, and charged with being involved in the poisoning incidents.<sup>686</sup> IRNA reported that they were identified by IRGC intelligence,<sup>687</sup> and Tasnim reported that one of them was a rioter who had been released and sent videos to Iran International, trying to create unrest.<sup>688</sup> A father of one of the girls arrested and another young man were also arrested. According to Iran Wire’s sources, the father and daughter were filmed in what appeared to have been a forced confession, claiming that they set a nitrogen gas cylinder on fire and threw it into a school, filmed it, and sent the videos to Iran International.<sup>689</sup>

These five individuals were held in detention with no contact with their families for at least forty days, according to the Center for Human Rights in Iran.<sup>690</sup> No details were provided about what evidence justified their arrests.<sup>691</sup> A week later, once again in Fars province, the IRIB reported

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<sup>680</sup> *Id.*

<sup>681</sup> *Id.*

<sup>682</sup> *Asferi: The main culprits behind the students' poisoning have not yet been arrested*, ISNA (Mar. 14, 2023).

<sup>683</sup> *Final report on student poisoning submitted to Parliament Speaker*, IRNA (June 11, 2023).

<sup>684</sup> *Traces of a deviant trend in the student poisoning incident/We have no sympathy for this dirty trend/A large number of these people are under surveillance and interrogation*, Iran Labor News Agency (June 27, 2023).

<sup>685</sup> *Id.*

<sup>686</sup> *Five people arrested for poisoning students in Fars*, SHIRAZE.IR (Mar. 7, 2023).

<sup>687</sup> *Details of the insecurity operation in Fars schools and the arrest of the perpetrators*, IRNA (Mar. 7, 2023).

<sup>688</sup> *Decrease in school incidents on Tuesday*, TASNIM (Mar. 7, 2023).

<sup>689</sup> *Who are the citizens who have been arrested as perpetrators of school poisoning?* IRANWIRE (Apr. 23, 2023).

<sup>690</sup> *Iran: School Girls Continue to Face Chemical Attacks, Officials Refuse to Provide Security*, CENTER FOR HUMAN RIGHTS IN IRAN (Apr. 24, 2023) <https://iranhumanrights.org/2023/04/iran-school-girls-continue-to-face-chemical-attacks-officials-refuse-to-provide-security/>. It is unclear whether or where these teenagers were students, although given their ages, it is highly likely at least two of them were.

<sup>691</sup> *Id.*

that police identified and arrested two students in Eqlid who “threw cleaning cloths into the stove and released a smell, started coughing, and left class.”<sup>692</sup> The students were accused of trying to cancel an upcoming exam.<sup>693</sup> It is not clear whether – and on what basis – they were charged. Finally, at the end of April, three university students were reported to have been arrested for protesting the ongoing poisonings.<sup>694</sup> It’s not clear whether they were ever tried or convicted in a court of law.

### c. Journalists and Citizens Sharing Information

Officials also arrested individuals and imposed charges on domestic media outlets related to their reporting on the poisoning incidents. In early March, Tehran’s prosecutor’s office filed criminal charges against the domestic news outlets Ham Mihaan and Shargh Daily for “spreading lies,” which appears to have been a veiled accusation related to their reporting on the poisonings.<sup>695</sup> Two days later, Alipour Tabatabaei, a manager of the news site Qom News that had been following up on the poisonings, was reported to have been arrested.<sup>696</sup> Then, over the next ten days, Tehran’s Prosecutor’s office filed additional criminal charges against Rouydad24, also for reporting on the poisonings. Officials also reportedly arrested a blogger in Urmia with 700,000 followers on the blog’s Instagram page around the same time for blogging about the poisoning incidents.<sup>697</sup>

It was not only media outlets that were arrested for commenting on the poisonings, either. Three people were arrested by Tehran’s Prosecutor’s Office for posting on social media about the poisonings.<sup>698</sup> They were accused of spreading lies with the intention of harming others and disturbing public opinion.<sup>699</sup> On March 8, the IRIB reported that three unnamed people were arrested in Sanandaj and sent to prison for “attempt[ing] to spread rumors and lies.”<sup>700</sup> On March 13, someone operating an unspecified Instagram account was arrested and charged for “attempting to disturb public opinion regarding recent events and the serial poisoning of students.”<sup>701</sup> Then five weeks later, authorities arrested a woman in Qazvin for sending photos of girls in the hospital from a poisoning incident to “hostile media.”<sup>702</sup> Authorities reportedly used CCTV footage to identify her.<sup>703</sup> As mentioned above, the Ministry of Interior also reported

<sup>692</sup> *Mischief of 2 Eqlid students to cancel exam*, IRIB (Mar. 16, 2023).

<sup>693</sup> *Id.*

<sup>694</sup> See Iranian Writers’ Community (IWAC), FACEBOOK (Apr. 28, 2023) [https://www.facebook.com/story.php/?story\\_fbid=174281072230179&id=100089448601731&\\_rdar](https://www.facebook.com/story.php/?story_fbid=174281072230179&id=100089448601731&_rdar); see also *Students Arrested and Banished, Professors Fired in Latest State Crackdown in Iran*, CENTER FOR HUMAN RIGHTS IN IRAN (June 1, 2023) <https://iranhumanrights.org/2023/06/students-arrested-and-banished-professors-fired-in-latest-state-crackdown-in-iran/>.

<sup>695</sup> FARS NEWS AGENCY X (Mar. 3, 2023) [https://x.com/FarsNews\\_Agency/status/1632969174002671621](https://x.com/FarsNews_Agency/status/1632969174002671621).

<sup>696</sup> *Seyed Ali Pourtabatabaei, one of the editors of the news website "Qom News", was arrested*, ETEMAD DAILY (Mar. 5, 2023).

<sup>697</sup> *Blogger arrested in connection with serial student poisoning case*, SHARGH DAILY (Mar. 10, 2023).

<sup>698</sup> *Indictment issued for "Sadegh Ziba Kalam" and "Azar Mansouri,"* TASNIM (Mar. 15, 2023).

<sup>699</sup> *Id.*

<sup>700</sup> *Three suspects arrested for spreading rumors about poisoning of students in Sanandaj*, IRIB (Mar. 8, 2023).

<sup>701</sup> *Identification and arrest of the person responsible for spreading lies and disturbing public opinion in Hormozgan*, ISNA (Mar. 13, 2023).

<sup>702</sup> *The person responsible for sending images of students being poisoned to hostile media outlets was arrested in Qazvin*, IRNA (Apr. 20, 2023).

<sup>703</sup> *Id.*

arrests of at least two people for taking videos of incidents.<sup>704</sup> By August 2023, the FFMI reported that based on an August 2023 report by the High Council for Human Rights of Iran, 48 court cases had been filed across eight provinces against individuals arrested for allegedly spreading rumors, encouraging protests or school closures, or otherwise causing fear in relation to the poisonings.<sup>705</sup> In fall 2024, a teacher and board member of the Teachers' Trade Association of Tehran reported to Evin Prison for a six month sentence for posting on social media about the school poisonings in Iran.<sup>706</sup>

### iii. Summary of Official Actions Taken in Response to the Poisoning Incidents

Safety and Security Measures: With regard to our cases, while emergency medical personnel did arrive in all of the schools where poisoning attacks occurred to assist girls in distress following the incidents, in general, officials appeared more concerned with preventing information or societal unrest from spreading than they did with keeping the girls safe. Administrators prevented girls from leaving the schools in five cases, something they may have been ordered to do by the Ministry of Education. No additional security measures were reported to have been put in place to schools to keep girls safe, apart from instructing school administrators on how to handle future incidents, and officials appeared more concerned with limiting information, dissuading multimedia capturing of events, and discouraging protests, than with girls' safety in schools.

These patterns appeared to repeat themselves in connection with incidents taking place throughout Iran. Officials created the appearance of instituting security and safety measures in schools but in practice these measures did not seem to materialize. First, publicly, officials announced that administrators should evacuate students immediately if a poisoning occurred. However, privately, school administrators were reportedly ordered to keep students inside should a poisoning occur in order to prevent information from being spread to the media. Second, FARAJA announced that they had placed all schools in Iran under police surveillance, and the Basij stated that it was ready to provide security assistance, but once again, in reality, it appears that schools had not in fact been provided with any help to enhance security, and instead, school administrators were tasked with the responsibility of ensuring their own school's security. Third, schools were not closed even temporarily and even in areas where poisoning incidents occurred; students were reportedly required to attend, and staff were prohibited from taking leaves of absence.

This pattern of conduct, both in our cases and nationally, suggests that officials were preoccupied with controlling information spreading about the poisoning incidents, and this trumped concerns

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<sup>704</sup> *Three of those arrested have criminal records, including involvement in recent riots*, IRNA (Mar. 7, 2023).

<sup>705</sup> Human Rights Council, *Detailed Findings of the Independent International Fact-Finding Mission on the Islamic Republic of Iran*, ¶ 1379, A/HRC/55/CRP.1, (Mar. 19, 2024).

<sup>706</sup> Human Rights Council, *Consolidated Findings of the Independent International Fact-Finding Mission of the Islamic Republic of Iran*, ¶ 117, A/HRC/58/CRP.1 (Mar. 18, 2025). He was released in February 2025, according to the FFMI. *Id.*



about student safety. Officials appear to have largely left schools to handle their own safety and security, despite statements to the contrary.

Follow-up Investigations and Arrests: For our cases, it was common for relevant officials to announce ongoing or new investigations meant to identify the cause and those responsible. Yet in seven cases, no results from these investigations ever publicly materialized. Evidence from several cases casts doubt on the legitimacy of these investigations, including indications that officials failed to collect samples from the affected girls and appeared to ignore CCTV footage. In the six cases where officials did offer explanations for what happened, the explanations lacked evidentiary support or were contradicted by other evidence. In four of our cases, three perpetrators were allegedly arrested, who were officials from a local gas company and the driver of an oil tanker. However, there is evidence in all four cases indicating that neither the gas company nor the tanker were responsible for the poisoning incidents they were accused of causing. We did not find reports of perpetrator arrests for the remaining nine cases.<sup>707</sup>

Beyond our cases, officials announced at least six different investigations. Initially, several investigations reportedly gathered samples from affected students and from the school environments and tested them in laboratories for toxins. Officials involved in the investigations not led by the Ministries of Interior, Intelligence, or the national police, all announced that girls had suffered from “mild poisoning” from inhaling an unknown toxic gas, with participating officials stating that there was “no doubt that poisoning occurred” and that “hysterics are not the main cause of the poisonings.” However, these initial findings were eventually replaced by assertions that the vast majority of cases were caused by stress, with limited evidentiary support or explanation. Eventually, the various investigations launched by the government concluded that the vast majority of incidents were caused by mass hysteria. For the small minority of incidents not caused by mass hysteria, non-toxic agents like pepper spray, stink bombs, or tear gas were said to be used either by students to get out of class or by people trying to stoke unrest. Few evidentiary details were provided justifying these conclusions, and relevant documentation in support of these claims was never released.

In addition, while more than one hundred people were reportedly arrested as alleged perpetrators of these incidents, few details were ever provided about who these people were or what evidence justified their arrest. Nor could we find any information about whether any perpetrators were eventually tried and convicted in a court of law under due process. Instead, the only details provided suggested that “perpetrators” were primarily people who were trying to share information about the incidents. During this time, the government also arrested (and in some cases indicted) at least eight students for allegedly perpetrating incidents or for protesting them, and at least 11 individuals and three news outlets for sharing information about the poisoning incidents. By August 2023, 48 cases had been brought against people for protesting, causing unrest, or sharing information about the poisonings.

In sum, officials failed to take adequate measures to protect schools and prevent future incidents from happening, and they failed to properly investigate the poisonings. As detailed below in Part

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<sup>707</sup> For one of these cases, the Ministry of Interior claimed that it had rounded up alleged perpetrators in the province, but few details were provided about who was arrested, for which incidents they were arrested, and on what evidence they were arrested, so we cannot know for sure whether the arrests pertained to our case.

III, at minimum, these failures amount to a failure to ensure respect for human rights and a failure to provide proper redress for victims, contrary to Iran's legal obligations under international human rights law. Even more concerning, circumstantial evidence outlined in Parts I and II further suggests that Iranian state organs or agents may have carried out the poisoning incidents.

## PART III: IRAN FAILED TO MEET ITS OBLIGATIONS UNDER INTERNATIONAL HUMAN RIGHTS LAW

Under two separate legal theories of responsibility, the poisonings constituted violations of obligations under several international human rights law treaties to which Iran is a party, including the International Covenant on Civil and Political Rights (ICCPR), the International Covenant on Economic, Social, and Cultural Rights (ICESCR), and the Convention on the Rights of the Child (CRC). Under the first legal theory of responsibility, Iran violated several international human rights obligations because circumstantial evidence suggests that Iranian state organs or agents were responsible for the poisonings. Under the second, even assuming the poisonings are not attributable to Iranian state organs or agents, Iran still violated its human rights obligations because it failed to uphold the required treaty-based due diligence measures.

### A. Iran's Obligations Under International Human Rights Law

States are responsible for internationally wrongful acts that are attributable to them and that constitute a breach of an international legal obligation, including their obligations under international human rights treaties.<sup>708</sup> Acts that are attributable to a state involve those committed by an organ of the state<sup>709</sup> (even an actor exercising governmental authority exceeding its authority under domestic law<sup>710</sup>) or those carried about by persons acting under the direction or control of the state.<sup>711</sup> Iran is a party to the International Covenant on Civil and Political Rights (ICCPR), the International Covenant on Economic, Social, and Cultural Rights (ICESCR), and the Convention on the Rights of the Child (CRC).<sup>712</sup> The poisonings likely violated several rights protected by provisions in these treaties, detailed below in Table 4. Should an Iranian government official or an actor operating under state direction or control be responsible for acts that violate any of the rights set out in these treaties, Iran itself would be held responsible.

Even if the poisoning incidents were caused by a non-state actor or group not acting under the direction or control of the Iranian state, Iran would be legally responsible if it failed to undertake

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<sup>708</sup> ILC Draft Articles on Responsibility of States for Internationally Wrongful Acts (ARSIWA) with commentaries (2001) ILC YB II/2 at Art. 2, 34-5.

<sup>709</sup> *Id.* at Art. 4.

<sup>710</sup> *Id.* at Art. 7.

<sup>711</sup> *Id.* at Art. 8.

<sup>712</sup> *UN Treaty Body Database: Ratification Status for Iran (Islamic Republic of)*, OHCHR [https://tbinternet.ohchr.org/\\_layouts/15/TreatyBodyExternal/Treaty.aspx?CountryID=81&Lang=EN](https://tbinternet.ohchr.org/_layouts/15/TreatyBodyExternal/Treaty.aspx?CountryID=81&Lang=EN).

due diligence measures that require states to ensure respect for the human rights recognized by key human rights treaties and to provide an effective remedy where violations occur.<sup>713</sup> This is because certain human rights treaties, including the ICCPR and the CRC, do not merely pose restrictions on the actions of the state, but require that state parties “respect and ensure” the rights set out in those treaties,<sup>714</sup> reflecting the notion first articulated in the Universal Declaration of Human Rights that “everyone is entitled to all the rights and freedoms” set forth in that Declaration.<sup>715</sup> International law does not prescribe exact measures for states’ due diligence obligations under human rights treaties. Generally, human rights bodies have interpreted due diligence to require that states (1) ensure respect for human rights by taking “reasonable” or “necessary” steps to avert the potential human rights abuse, and (2) to provide effective remedies to victims, including conducting proper investigations and, where appropriate, prosecuting perpetrators and providing reparations and/or other remedies to victims.<sup>716</sup>

Regarding the specific treaty provisions violated by the poisonings, several provisions under the human rights treaties to which Iran is a party – the ICCPR, ICESCR, and the CRC – were implicated by the poisonings. These include the child’s right to be free from violence, the prohibition on cruel, inhuman, and degrading treatment (CIDT), the right to health, the right to education, and the prohibition on discrimination on the basis of sex.

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<sup>713</sup> Human Rights Committee, *General Comment No. 31, The Nature of the General Legal Obligation Imposed on State Parties to the Covenant*, ¶ 8, UN Doc. CCPR/C/21/Rev.1/Add.13 (2004), (interpreting states’ obligations under the ICCPR as requiring that they “take appropriate measures or to exercise due diligence to prevent, punish, investigate, or redress the harm caused by such acts by private persons or entities”).

<sup>714</sup> International Covenant on Civil and Political Rights (hereinafter ICCPR), art. 2(1) 999 U.N.T.S. 171(1967); Convention on the Rights of the Child (hereinafter CRC), art. 2(1), 1577 U.N.T.S. 3 (1989); *see also* Human Rights Committee, *General Comment No. 31, supra* note 713; CRC, art. 19 (requiring that State Parties to the CRC “take all appropriate ... measures to protect the child from all forms of physical or mental violence, injury, or abuse”); Committee on the Rights of the Child, *General Comment No. 13*, ¶ 51, CRC/C/GC/13 (2011) (interpreting art. 19, para. 2 to require states to investigate instances of violence by pursuing “rigorous but child-sensitive procedures” to correctly identify and “help provide evidence administrative, civil, child-protection, and criminal” proceedings); *see generally* Committee on the Rights of the Child, *General Comment No. 5*, ¶¶ 4, 9, UN Doc. CRC/GC/2003/5 (2003) (mentioning states’ obligation to “respect and ensure” respect for the CRC, and comparing other implementation articles in the CRC to “complementary” obligations in other treaties like the ICCPR).

<sup>715</sup> Universal Declaration of Human Rights, art. 2, U.N. Gen. Ass. Res. 217A (III), A/RES/217(III) (December 10, 1948).

<sup>716</sup> Human Rights Committee, *General Comment No. 31, supra* note 713 at ¶ 8; ICCPR, art. 2(2); Case of Velasquez Rodriguez v. Honduras, Merits, Judgment, Inter-Am. Ct. H.R. (ser. C) No. 4 ¶ 175 (1988); *see also* ALICE OLLINO, DUE DILIGENCE OBLIGATIONS IN INTERNATIONAL LAW 170 (2022) (defining “reasonableness”) as the appropriate standard for assessing due diligence obligations).

**Table 4. List of Human Rights Obligations Implicated by the Poisoning Incidents**

<b>Rights or Protections</b>	<b>ICCPR</b>	<b>ICESCR</b>	<b>CRC</b>
<i><b>Child's right to protection and freedom from violence</b></i>	"Every child shall have ... the right to such measures of protection as are required by his status as a minor" (Art. 24)	N/A	"Take all appropriate ... measures to protect the child from all forms of physical or mental violence, injury, or abuse" (Art. 19) "States Parties undertake to ensure the child such protection and care as is necessary for his or her well-being" (Art. 3(2))
<i><b>Prohibition on cruel, inhumane, and degrading treatment</b></i>	"No one shall be subjected to torture or to cruel, inhuman or degrading treatment"	N/A	N/A
<i><b>Right to health</b></i>	N/A	"Recognize the right of everyone to the enjoyment of the highest attainable standard of physical and mental health" (Art. 12(1))	N/A
<i><b>Right to education</b></i>	N/A	"Recognize the right of everyone to education ... secondary education ... shall be made generally available and accessible to all by every appropriate means" (Art. 13)	"Recognize the right of the child to education and ... [states] shall ... make [secondary education] available and accessible to every child" (Art. 28)
<i><b>Non-discrimination on the basis of sex</b></i>	"The law shall prohibit any discrimination and guarantee to all persons equal and effective protection against discrimination on any ground such as ... sex" (Art. 26)	"Undertake to guarantee that the rights ... in the present Covenant will be exercised without discrimination of any kind as to ... sex" (Art. 2(2))	"Respect and ensure the rights set forth in the present Convention to each child ... without discrimination of any kind, irrespective of the child's ... sex" (Art. 2)

### i. Child's Right to be Free from Violence

State parties to the CRC are required to protect children within their jurisdictions from all forms of violence, injury, or abuse.<sup>717</sup> Similarly, under the ICCPR, state parties are expected to prevent children from being subjected to violence or abuse.<sup>718</sup> According to the committee responsible for interpreting and overseeing implementation of the CRC, violence is meant to “represent all forms of harm to children,” and physical violence includes both fatal and non-fatal violence.<sup>719</sup> Violence almost certainly includes intentional poisoning. Should Iranian state organs or agents have carried out the poisonings, they violated a child's right to be free from violence.

Even if the poisonings are not attributable to Iranian state organs or agents, Iran still violated the child's right to be free from violence. That's because Iran failed to uphold the due diligence requirements that are generally required under the ICCPR and the CRC.<sup>720</sup> There are also due diligence-like specifications involving the child's right to be free from violence, requiring that state parties “take all appropriate ... measures” to both prevent and respond to all forms of violence against minors.<sup>721</sup> This includes situations in which children are in the care of caregivers, like teachers or school administrators, but is not restricted to instances where the caregiver is responsible for the violence.<sup>722</sup> Iran's failure to uphold its due diligence requirements is detailed in Parts C and D below.

### ii. Prohibition on Cruel, Inhuman, or Degrading Treatment

Under the ICCPR, no person subject to Iran's jurisdiction may be subjected to cruel, inhuman, or degrading treatment (CIDT).<sup>723</sup> There is no singular legal definition of what constitutes CIDT. One definition is “unjustifiable conduct that causes severe physical, mental, or psychological pain or suffering.”<sup>724</sup> Relevant considerations include the nature, the purpose, and the severity of the acts or omissions in question.<sup>725</sup> Actions rising to the level of CIDT do not, unlike torture, need to be directed for a specific purpose, but may instead include uses of force or activities that are “unnecessary, excessive, or otherwise unlawful.”<sup>726</sup> Nor do they need to be instances of

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<sup>717</sup> CRC, arts. 19, 3(2); Committee on the Rights of the Child, *General Comment No. 14 on the Right of the Child to Have His or Her Best Interests Taken as a Primary Consideration* (art. 3, para. 1), Doc. CRC/C/GC/14, ¶¶ 71, 74 (May 29, 2013) (interpreting Art. 3(2) to obligate state parties to ensure children receive “protection and care” including by protecting children from present and future harm).

<sup>718</sup> ICCPR, art. 24; Human Rights Committee, *General Comment No. 17: Article 24 (Rights of the child)*, U.N. Doc. CCPR/C/21/Rev.1/Add.9, ¶ 3 (1989) (interpreting Article 24 to require that state parties ensure children enjoy ICCPR enunciated rights and take measures to prevent children from being subjected to violence or abuse).

<sup>719</sup> Committee on the Rights of the Child, *General Comment No. 13*, *supra* note 714.

<sup>720</sup> *See supra* note 714.

<sup>721</sup> CRC, art. 19.

<sup>722</sup> Committee on the Rights of the Child, *General Comment No. 13*, *supra* note 714, at Part IV.2 (defining a caregiver as either a primary caregiver or a temporary or proxy caregiver, such as a teacher, and referring to schools as “usual care settings”). There is less detail for the ICCPR provision, and State parties are expected to make their own assessments on what is appropriate for protecting children from violence within their jurisdictions. *See* Human Rights Committee, *General Comment No. 17*, *supra* note 718 at ¶ 71.

<sup>723</sup> ICCPR, art. 7.

<sup>724</sup> *Michael Gayle v. Jamaica*, Case 12.418, ¶ 61, Inter-Am. Comm'n H.R., Report No. 92/05 (Oct. 24, 2005).

<sup>725</sup> Human Rights Committee, *General Comment No. 20, Article 7 (Prohibition of Torture, or Other Cruel, Inhuman or Degrading Treatment or Punishment)*, ¶ 4, U.N. Doc. HRI/GEN/1/Rev.1 (1994).

<sup>726</sup> *Corumbiara v. Brazil*, Case 11.556, ¶¶ 226, 228, Inter-Am. Comm'n H.R., Report No. 32/04, Merits (Mar. 11, 2004); *see also* *Cestaro v. Italy*, App. No. 6884/11, ¶¶ 170–90, Eur. Ct. H.R., Judgement (Apr. 7, 2015) (finding torture where police officers violently beat protesters, which the Court ruled was “excessive, indiscriminate and



custodial control; instead, they can involve instances in which people are not deprived of their liberty.<sup>727</sup>

The poisonings caused physical discomfort and illness among thousands of schoolchildren, some of whom were forced to remain in the hospital for several days.<sup>728</sup> While there is no clear benchmark for what amounts to cruel, inhuman, or degrading treatment, this appears to meet the threshold,<sup>729</sup> particularly in light of the fact that those affected here were minors at the time.<sup>730</sup> Moreover, intentional poisonings were unjustifiable; it is difficult to conceive of any instance in which the use of a toxic agent is necessary to deploy against schoolchildren while they are inside of school, even a riot control agent like tear gas or pepper spray.<sup>731</sup> Should the poisonings be attributable to Iranian state organs or agents, Iran violated Article 7 of the ICCPR. Even if the poisoning incidents are not attributable to Iranian state agents or organs, Iran still must meet due diligence obligations under the ICCPR to ensure protection against CIDT and provide redress to victims.<sup>732</sup> Iran's failure to do so is detailed below in Parts C and D.

### iii. Right to Health

Under the ICESCR, Iranians have the right to the “highest attainable standard of physical and mental health.”<sup>733</sup> According to the Committee tasked with interpreting the ICESCR and overseeing its implementation, state parties are prohibited from, among other actions, taking any “deliberatively retrogressive measures” that might undermine the right to health.<sup>734</sup> State parties are also expected to, among other actions, ensure the right of access to health facilities,

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manifestly disproportionate force”); *Extra-Custodial Use of Force and the Prohibition of Torture and Other Cruel, Inhuman or Degrading Treatment or Punishment*, Report of the Special Rapporteur on Torture and Other Cruel, Inhuman or Degrading Treatment or Punishment, ¶ 32, A/72/178 (July 20, 2017).

<sup>727</sup> See Report of the Special Rapporteur on Torture, *supra* note 726, at ¶¶ 34-6.

<sup>728</sup> See *supra* Part I (detailing the significant discomfort experienced by girls affected by the poisoning incidents, as well as in particular, the second reported case in Qom in which girls were reportedly forced to remain in the hospital for several days).

<sup>729</sup> See, e.g., *Abdullah Yasa and Others v. Turkey*, App. No. 22684/05, ¶¶ 48, 50, Eur. Ct. H.R., Judgment (Apr. 2, 2009) (projectile tear gas amounted to CIDT or torture); *Anzhelo Georgiev and Others v. Bulgaria*, App. No. 51284/09, ¶ 78, Eur. Ct. H.R., Judgment (Sept. 30, 2014) (electrical weapon amounted to CIDT or torture); *Selçuk and Asker v. Turkey*, App. Nos. 23184/94 and 23185/94, ¶¶ 77-78, Eur. Ct. H.R. Judgment (Apr. 24, 1998) (burning of homes CIDT due to victims being forced to having to watch the burning of their homes).

<sup>730</sup> The ICCPR instructs states to adopt special measures to ensure human rights of children are protected. See ICCPR, art. 24 (“Every child shall have ... the right to such measures of protection as are required by his status as a minor”); see also Human Rights Committee, *General Comment No. 17*, *supra* note 718 at ¶ 1 (interpreting Article 24 to require states to adopt special measures to ensure children also receive the Covenant’s protections).

<sup>731</sup> See, e.g., *Abdullah Yasa and Others v. Turkey*, App. no. 22684/05, *supra* note 729 (finding the launching of a tear gas grenade aimed at protesters violative of the prohibition on torture and CIDT because it was not proportionate with the aim of dispersing protesters).

<sup>732</sup> Human Rights Committee, *General Comment No. 20*, *supra* note 725 at ¶¶ 2, 13-14 (interpreting the prohibition on torture and CIDT as applying not only to public officials but also “private persons,” and requiring that complaints be “investigated promptly and impartially by competent authorities”); ICCPR, arts. 2(1), 2(3); see also *Torture in International Law: A Guide to Jurisprudence*, ASSOC. PREVENTION OF TORTURE & CENTER FOR JUSTICE IN INT’L LAW 13, 17 (2008) <https://www.corteidh.or.cr/tablas/26562.pdf> (detailing a duty to protect against torture and CIDT from private actors).

<sup>733</sup> International Covenant on Economic, Social and Cultural Rights (hereinafter ICESCR), art. 12(1), Dec. 16, 1966, 993 U.N.T.S. 3 (entered into force Jan. 3, 1976).

<sup>734</sup> Committee on Economic, Social, and Cultural Rights, *General Comment No. 14*, ¶ 32, U.N. Doc. E/C.12/2000/4 (2000).

especially for vulnerable or marginalized groups.<sup>735</sup> Here, should state agents or officials be responsible for the poisonings, this would be a clear retrogressive measure against girls' right to health, even though the state did appear to provide access to medical care for affected schoolgirls.<sup>736</sup>

In addition, according to the Committee tasked with interpreting the ICESCR and overseeing its implementation, state parties are expected to, among other actions, refrain from censoring, withholding, or intentionally misrepresenting health-related information.<sup>737</sup> Iranian officials appear to have intentionally withheld and misrepresented information about the poisonings and their effects from parents and schoolchildren alike.<sup>738</sup> The fact that the poisonings affected children and adolescents only enhances Iran's obligation.<sup>739</sup> Iran's misrepresentation of the poisonings, detailed below in Parts B and C, also likely violates the right to health under the ICESCR.

#### iv. Right to Education

Iran is required to make secondary education accessible and available to all under the ICESCR and the CRC.<sup>740</sup> This right has been interpreted to include ensuring a safe learning environment,<sup>741</sup> along with requiring state parties to prevent violence targeting schools.<sup>742</sup> Should Iranian state organs or agents be responsible for the poisonings, they undermined the safe learning environment and thus violated Iranian students' right to an education under the ICESCR and the CRC.

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<sup>735</sup> *Id.* at ¶ 43(a).

<sup>736</sup> See *supra* Part II.B(i)(a)(1) (detailing the arrival of medical personnel on the scene for our cases). Note that our research was exclusively open-source, and more facts would need to be gathered by researchers with access to people inside of Iran to get a better sense of what medical care the girls received to fully understand whether this right has been met.

<sup>737</sup> Committee on Economic, Social, and Cultural Rights, *General Comment No. 14*, *supra* note 734 at ¶ 34.

<sup>738</sup> See *infra* Part III.B (describing state obfuscation and withholding of information about the poisoning incidents and investigations); see also *supra* Part II.A (detailing state-affiliated news outlets' reporting about the poisonings, which tended to doubt whether incidents occurred, downplay girls' symptoms, contradict prior information, and starting in April, largely stopped reporting on them at all); *"The Poisoning Incident" and the Media That Arrives Late/Why Don't We Consider the Media a Friend?* ISNA (Mar. 4, 2023) (writing that "not much content has been produced about [...] safety").

<sup>739</sup> Committee on Economic, Social, and Cultural Rights, *General Comment No. 14*, *supra* note 734 at ¶ 35.

<sup>740</sup> ICESCR, art. 13; CRC, art. 28.

<sup>741</sup> See Committee on the Rights of the Child, *General Comment No. 1, The Aims of Education*, ¶ 16, Doc. CRC/GC/2001/1 (Apr. 17, 2001) (interpreting the right to education to include preventing violence targeting schools); see also Zama Coursen-Neff & Bede Sheppard, *Schools as Battlegrounds*, HUMAN RIGHTS WATCH (2011) (explaining that the right to education requires that states prevent and respond to attacks on schools) <https://www.hrw.org/node/259368#f5c311>; Haki Zetu: *The Right to Education*, AMNESTY INT'L 32 (2012) [https://www.right-to-education.org/sites/right-to-education.org/files/resource-attachments/RTE\\_AI\\_Haki\\_Zetu\\_Right\\_to\\_Education\\_2012.pdf](https://www.right-to-education.org/sites/right-to-education.org/files/resource-attachments/RTE_AI_Haki_Zetu_Right_to_Education_2012.pdf) (defining as a component of the right to education the right to a safe and non-violent school environment).

<sup>742</sup> Committee on the Rights of the Child, *General Comment No. 1*, *supra* note 741. In addition, the Inter-American Court of Human Rights has interpreted the right of education enshrined in the American Convention of Human Rights as requiring State Parties to report, investigate, and punish acts of sexual violence in educational institutions and that a failure to do so comprises of, among others, a violation of the right to education. Guzmán Albarracín et al. v. Ecuador, Judgment (Merits, Reparations & Costs), ¶¶ 23, 24, 136, Inter-Am. Ct. H.R., Series C No. 405 (June 24, 2020).

Although there are not clear general due diligence requirements under the ICESCR, the right to education has been interpreted to include ensuring a safe learning environment,<sup>743</sup> along with requiring state parties to prevent violence targeting schools.<sup>744</sup> This is a due diligence-like requirement, meaning that even if the poisonings are not attributed to Iranian state organs or agents, Iran still violated the right to education by failing to ensure a safe learning environment.<sup>745</sup> Part C below lays out this failure.

## v. Prohibition Against Discrimination on the Basis of Sex

The poisoning incidents also violated protections against discrimination on the basis of sex, protected under the ICCPR, the ICESCR, and the CRC. Sex-based discrimination is a separate protection ensuring that rights are not protected discriminatorily. The European and Inter-American Courts of Human Rights appear to interpret the protection against discrimination to require repeated patterns or state practice that demonstrate discriminatory attitudes.<sup>746</sup> Here, the vast majority of incidents were reported at girls' schools across Iran,<sup>747</sup> a fact that Iranian officials themselves recognized.<sup>748</sup> If Iranian officials perpetrated the incidents, directing such a pattern of incidents against girls' schools seems quite clearly to constitute sex-based

<sup>743</sup> See Committee on the Rights of the Child, *General Comment No. 1*, *supra* note 741 (interpreting the right to education to include preventing violence targeting schools); see also Zama Coursen-Neff & Bede Sheppard, *Schools as Battlegrounds*, HUMAN RIGHTS WATCH (2011) (explaining that the right to education requires that states prevent and respond to attacks on schools) <https://www.hrw.org/node/259368#f5c311>; *Haki Zetu: The Right to Education*, AMNESTY INT'L 32 (2012) [https://www.right-to-education.org/sites/right-to-education.org/files/resource-attachments/RTE\\_AI\\_Haki\\_Zetu\\_Right\\_to\\_Education\\_2012.pdf](https://www.right-to-education.org/sites/right-to-education.org/files/resource-attachments/RTE_AI_Haki_Zetu_Right_to_Education_2012.pdf) (defining as a component of the right to education the right to a safe and non-violent school environment).

<sup>744</sup> Committee on the Rights of the Child, *General Comment No. 1*, *supra* note 741. In addition, the Inter-American Court of Human Rights has interpreted the right of education enshrined in the American Convention of Human Rights as requiring State Parties to report, investigate, and punish acts of sexual violence in educational institutions and that a failure to do so comprises of, among others, a violation of the right to education. Guzmán Albarracín, Series C No. 405, *supra* note 742.

<sup>745</sup> See, e.g., Guzmán Albarracín, Series C No. 405, *supra* note 742 at ¶ 141 (noting that violence against girls can undermine their right to education).

<sup>746</sup> See, e.g., *Eremia and Others v. Republic of Moldova*, App. No. 3564/11, ¶ 89, Eur. Ct. H.R., Judgment, (May 28, 2013) (finding that treatment of a domestic violence victim amounted to sex-based discrimination because authorities' responses were not just simple failures or delays but represented discriminatory attitudes towards women); *Case of A. v. Croatia*, App. No. 55164/08, ¶ 97, Eur. Ct. H.R., Judgment, (Oct. 14, 2010) (finding no violation of non-discrimination Article where no statistics or additional information about patterns of discriminatory treatment across Croatia provided); *Halime Kilic v. Turkey*, App. No. 63034/11, Eur. Ct. H.R., Judgment Summary (June 28, 2016) (summarizing the court's findings in English, including that Turkey's judicial passivity with regards to domestic violence has created a climate conducive to domestic violence, and that women across Turkey were being killed from domestic violence at high rates, and that there were not enough women's shelters, all indicating that there is a discriminatory attitude towards women).

<sup>747</sup> See Mahmoud Azimae, *Schools' Poison Tracker* <https://sites.google.com/view/poison-tracker/english?authuser=0> (finding 82% of reported incidents were at girls' schools).

<sup>748</sup> See, e.g., *We must shed light on the conspiracies of our enemies*, ISNA (Mar. 5, 2023) (quoting Basij Major General Bahman Reyhani who said that the enemy was trying to close girls' schools with the poisoning incidents); *Chemical compounds responsible for poisoning Qomi students*, IRIB (Feb. 26, 2023) (quoting Younes Panahi, Deputy Minister of Research and Technology of the Ministry of Health and Medical Education, as saying that "some people wanted schools, especially girls' schools, to be closed"); *Herald: We are following the story of whether the poisoning of the schoolgirls was intentional*, ISNA (Feb. 27, 2023) (quoting the head of the Parliament's Education and Research Commission Alireza Monadi, who said that it appeared the poisonings were directed at preventing Iranian children, "especially our girls," from receiving an education).

discrimination of the right to education,<sup>749</sup> the right to health, and the prohibition on CIDT.<sup>750</sup> This is particularly true in light of the fact that those affected in these cases were minors, considered more vulnerable and requiring greater protection under the ICCPR and the CRC.<sup>751</sup>

Even if the poisonings are not attributable to Iranian state agents or organs, Iran likely still violated this protection. The fact that Iranian officials appear to have tolerated such incidents that overwhelmingly affected girls' schools for months without instituting protective measures at schools,<sup>752</sup> despite repeated reports of poisonings around the country, indicates that Iranian officials were discriminatory in carrying out their due diligence obligations. Parts C and D lay out Iran's due diligence failures.

## B. Iran Failed to Meet its Human Rights Obligations by Carrying Out the Poisoning Incidents: Circumstantial Evidence Suggesting Iranian Government Responsibility

Iran violated several rights and protections under the ICCPR, the ICESCR, and the CRC if the poisoning incidents are attributable to Iranian state organs or agents. These include the child's right to be free from violence, the prohibition on cruel, inhuman, and degrading treatment (CIDT), the right to health, the right to education, and the prohibition on discrimination on the basis of sex.

We did not uncover direct evidence attributing the poisonings to an organ or agent of the Iranian state. However, the totality of the circumstances suggests the plausible involvement of a state organ or agent in carrying out the poisonings, a possibility even posited by the state-affiliated news outlet IRNA.<sup>753</sup> This inference is supported by five arguments: (1) the state failed to seriously investigate the poisoning incidents, despite a powerful internal security apparatus; (2) it is unlikely that a non-state actor could have carried out the poisonings undetected in Iran; (3) officials appear to have sought to suppress or obscure information about the poisoning incidents;

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<sup>749</sup> See, e.g., Guzmán Albarracín, Series C No. 405, *supra* note 742 at ¶¶ 143-44 (finding that sexual violence against a girl in school violated her right to be free of violence and her right to education); see also Committee on the Rights of the Child, *General Comment No 1, The Aims of Education*, April 2001, Doc. CRC/GC/2001/1, para. 10 (noting that discrimination is capable undermining the capacity of a child to benefit from educational opportunities).

<sup>750</sup> See, e.g., *Talpis v. Italy*, App. No. 41237/14, ¶¶ 141, 143-45, Eur. Ct. H.R. Judgment (Mar. 21, 2017) (finding that Italian authorities did not carry out an investigation for seven months despite a complaint of domestic violence being lodged, and that by their complacency, the Italian police through their inaction effectively condoned the violent actions taken against a woman, violating non-discrimination); see also *supra* note **Error! Bookmark not defined.** (detailing several cases in which the European Court of Human Rights found violations of the prohibition on torture and CIDT in combination with non-discrimination in cases involving domestic violence).

<sup>751</sup> ICCPR, art. 24; see also Committee on the Rights of the Child, *General Comment No 1*, *supra* note 741 at ¶ 10 (noting that discrimination is capable undermining the capacity of a child to benefit from educational opportunities); see also Guzman Albarracin et. al. v. Ecuador, *supra* note 745 at para. 141 (observing how violence against women can implicate the right to education).

<sup>752</sup> See *infra* Part III.C (discussing Iran's failure to institute reasonable measures to prevent additional incidents).

<sup>753</sup> *The Story of Serial Poisonings, Roots and Possibilities*, IRNA (Mar. 1, 2023) (speculating that given the professionalism of the incidents, the incidents could have been carried out by an Iranian security agency).

(4) officials' explanations for the poisoning incidents shifted abruptly and inconsistently over time; and (5) the eventual explanations Iran offered for the poisonings were implausible.

i. Iran Failed to Pursue a Serious Investigation, Despite Its Powerful Internal Security Apparatus

First, it is not clear serious investigations into the poisonings were ever really pursued, despite the Iranian state's far-reaching domestic intelligence capabilities.<sup>754</sup> As detailed below in Parts C and D, investigators failed to collect relevant evidence when investigating, were biased in their approach, and failed to provide reliable explanations supported by evidence both for the cases we examined in detail and the cases around the country. These failures cannot be explained by a lack of time or potential evidence. Hundreds of similar incidents were reported at schools across Iran, spanning a period of more than six months. This should have given Iranian security officials plenty of time and potential evidence to investigate, and it is implausible that such a powerful security apparatus could not figure out what was going on and identify possible perpetrators of the poisoning incidents.<sup>755</sup> Seeming to confirm this, an MP from Parliament's Working Group on the poisonings lamented to ISNA in April 2023 (just 2.5 weeks before the Ministry of Intelligence released its findings) that security officials had not made enough of an effort to investigate the poisonings.<sup>756</sup> The absence of serious investigations suggests that officials did not actually want to uncover the cause of the poisoning incidents. This raises serious questions about their motives, given the threat the poisonings posed to schoolgirls around the country. One possible explanation is that Iranian state agents did not want to discover who was responsible for the poisonings because state agents were the perpetrators.

ii. Iran's Powerful Security Apparatus Makes It Implausible that Non-State Actors Could Have Successfully Carried Out the Poisonings

As this report shows, the evidence that poisoning incidents occurred in Iran during 2022-2023 is compelling. If these poisoning episodes were not attributable to Iranian government organs and agents, that would mean that non-state actors carried out a vast number of poisoning incidents. Nevertheless, although the government did arrest some individuals in connection to the

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<sup>754</sup> See *Country Report: Iran*, FREEDOM HOUSE (2025) <https://freedomhouse.org/country/iran/freedom-world/2025> (finding high levels of domestic repression, some of the highest in the world); Udit Banerjee, *Revolutionary Intelligence: The Expanding Intelligence Role of the Iranian Revolutionary Guard Corps*, 8 J. STRATEGIC SECURITY 93, 96-7 (2015) (detailing the formation of a new expansive intelligence and security apparatus that was geared towards quelling dissent inside of Iran); see also Sam Biddle & Murtaza Hussain, *Hacked Documents: How Iran Can Track and Control Protesters' Phones*, INTERCEPT (Oct. 28, 2022) (detailing powerful technology used by Iran's domestic intelligence and security apparatus to hack into individual's phones and track their movements) <https://theintercept.com/2022/10/28/iran-protests-phone-surveillance/>; Connor Bradbury, *Profiles: Iran's Intelligence Agencies*, U.S. INSTITUTE OF PEACE (Apr. 5, 2023) <https://iranprimer.usip.org/blog/2023/apr/05/profiles-iran%E2%80%99s-intelligence-agencies> (detailing Iran's various intelligence agencies including those focused on domestic surveillance and repression).

<sup>755</sup> See *Political poisoning ! / Grossi's new opportunity in his trip to Tehran/What was the reason for the widespread reaction to Pirouz's death?*, TABNAK NEWS (Mar. 2, 2023) (owned by a former IRGC commander, Tabnak news published a piece in which the author wrote that it is "no secret to anyone that agents in the system, with wide apparatuses at their disposal, can easily discover the causes behind the poisoning of the students").

<sup>756</sup> *Latest news from the investigation of "Serial Poisoning in Schools" by the Ministry of Health's Scientific Committee*, ISNA (Apr. 10, 2023).



poisonings, no set of perpetrators – as far as we are aware – was ever announced as being responsible for all poisonings across the country, nor were such perpetrators tried and convicted in a court of law with due process.<sup>757</sup> Given Iran’s vast domestic intelligence network, it is implausible that a non-state actor could have successfully carried out such widespread poisonings without detection. Iran has one of the most extensive – and repressive – domestic intelligence and security apparatuses in the world,<sup>758</sup> one that has proven remarkably effective in tracking and punishing dissidents, most recently during the “Woman, Life, Freedom” movement.<sup>759</sup> Given the implausibility that a non-state actor could have carried out hundreds of poisonings across Iran without detection, the state’s failure to identify or announce credible perpetrators is, at minimum, deeply suspicious. This absence reinforces indications that the poisoning incidents may have been carried out by organs or agents of the Iranian government.

### iii. Iran Actively Hid Information About the Poisonings

Dovetailing the lack of a serious investigation and the unlikelihood that a non-state actor could have carried out the poisonings without detection, officials demonstrated an intense preoccupation with preventing information about the poisonings from reaching the public. This preoccupation with controlling access to information about the poisonings plausibly suggests that the state was intent on concealing information that might indicate the involvement of state organs or agents in the incidents, and on shaping the narrative surrounding the events.

By early March 2023, government officials and state-affiliated news outlets began obfuscating details about the poisonings, casting doubt about new poisonings, attributing them to girls’ anxiety, downplayed girls’ symptoms, or denying that certain incidents happened at all.<sup>760</sup> One member of Parliament’s Health Commission effectively admitted that officials had intentionally withheld information, lamenting to a domestic news outlet in an article published in mid-March that “cooperation [with investigations] did not happen here, because we were not honest with the people and hid the matter.”<sup>761</sup> Tellingly, relevant witnesses or experts like teachers or doctors who had treated affected girls were also reportedly strongly discouraged from speaking about incidents publicly,<sup>762</sup> and affected persons interviewed by state security officials were reportedly

<sup>757</sup> While we did find announcements that arrests had been made in June, there were no details released or follow-up reporting on convictions, suggesting that these arrests were not of the actual perpetrators. See Part II.B(ii)(d).

<sup>758</sup> See *supra* note 754.

<sup>759</sup> *Consolidated Findings of the Independent Fact-Finding Mission on the Islamic Republic of Iran*, HUMAN RIGHTS COUNCIL 7-19, 110-113 (Mar. 18, 2025)

<https://www.ohchr.org/sites/default/files/documents/hrbodies/hrcouncil/sessions-regular/session58/advance-version/a-hrc-58-crp-1.pdf> (detailing widespread repression of state security apparatuses against Iranian citizens, including the use of sophisticated digital surveillance, particularly women and girls and those participating in the protests); Maryam Alemzadeh, *Iran Protests and Patterns of Repression*, 56 IRANIAN STUDIES 557, 558-9 (Aug. 2023) (detailing the tracking and repression of protesters during the “Woman, Life, Freedom” movement by Iranian state agencies including in particular the IRGC); *Iran: Repression Continues Two Years After Nationwide Protests*, UN NEWS (Mar. 18, 2024) <https://news.un.org/en/story/2024/03/1147681> (head of the UN’s Fact-Finding Mission detailing Iranian state repression, including a “chilling” use of AI to surveil and monitor compliance among its citizens).

<sup>760</sup> See *supra* Part II.A(ii).

<sup>761</sup> *26 provinces and 245 schools were involved in the poisoning/security forces were unable to find any foreign agents/they covered up the issue*, ROUYDAD24 (Mar. 17, 2023).

<sup>762</sup> See *The mystery of the unknown gas*, HAM-MIHAN (Mar. 4, 2023) (reporting that doctors and nurses feared repercussions or disciplinary action from hospital administrators for speaking out, and some told Ham-Mihan that

told the explanation for the event, rather than the other way around.<sup>763</sup> By early April 2023, the government appears to have simply prohibited reporting on the poisonings altogether.<sup>764</sup>

Officials instead instructed the public repeatedly to only rely on “official news sources”<sup>765</sup> and to avoid spreading rumors.<sup>766</sup> In several of our cases, security officials were reported to have been present to prevent or dissuade protests, or else to prevent citizens from filming what was happening.<sup>767</sup> These admonishments were not merely rhetorical; in our cases, officials threatened any citizen “spreading rumors” with the “security establishment,” and said that two people sending videos to “hostile networks” were summoned by security services in early March.<sup>768</sup>

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they had been explicitly instructed not to speak or share information about the incidents, orders that were believed to come from the Ministry of Health); *Unknown Gas Puzzle in Schools*, ROUYDAD24 (Mar. 4, 2023) (same); *see also infra* note **Error! Bookmark not defined.** (describing teachers’ avoiding speaking about incidents out of fear or being threatened if they speak out).

<sup>763</sup> *See Iran: School Girls Continue to Face Chemical Attacks, Officials Refuse to Provide Security*, CENTER FOR HUMAN RIGHTS IN IRAN (Apr. 24, 2023) (interviewing a teacher in an unspecified incident on April 17, who told the non-profit that police and security forces came to the school and “insisted that it was mischief carried out by the students”).

<sup>764</sup> *See supra* Part II.A(i)-(ii) (detailing the abrupt halt in reporting about the poisonings beginning in early April); Citizen Journalist, *Anger over Saqqez School Poisonings Triggers more Security, Censorship*, IRAN WIRE (Apr. 10, 2023) (Doc. 220\_30) (local journalist reporting that the Press Council in Saqqez, Kurdistan, had been prohibited from reporting on the poisonings); @Vahid, X <https://x.com/Vahid/status/1645074730414665730> (reposting an order by the Press Supervision Board under the Ministry of Cultural Affairs to refrain from reporting on the poisoning incidents on April 10, 2023).

<sup>765</sup> *See, e.g., Students' families should remain calm and avoid paying attention to rumors*, IRNA (Mar. 5, 2023) (reporting on an incident in Ilam Province, but in the article emphasizing that “the important thing is for families to control and manage their own and their children’s peace” and encouraged families not to worry and ignore rumors); *What was the story of the poisoning of students at Payam Shahed School in Isfahan?* TASNIM (Mar. 5, 2023) (urging parents and students to “avoid paying attention to false news and rumors that are being spread with the aim of causing fear, stress, and discrediting the educational environment, and [to] maintain peace for themselves and their children”); *Rumors of poisoning in Kerman schools*, IRIB (Mar. 6, 2023) (denying a poisoning occurred in Kerman and urging families “not to pay attention to rumors”); *Pardis County Governor: 35 poisoned students have been discharged from the hospital*, IRNA (Mar. 1, 2023) (Doc. 357\_22) (encouraging people to only use official information sources and warning that the “security establishment” would deal with anyone caught spreading rumors); *Repeat poisoning of Borujerd students, this time at the 15 Khordad High School*, MEHR (Feb. 26, 2023) (Doc. 257\_25) (Deputy Governor of Lorestan Province Majid Monemi encouraging people to listen only to “official” sources of information about the poisonings).

<sup>766</sup> *See, e.g., Khatami: Judiciary should deal decisively with rumor-mongers in the students' plight*, TASNIM (Mar. 10, 2023) (quoting the Friday prayer Imam in Tehran Ahmad Khatami, who called for harsh treatment for anyone caught spreading rumors about the poisoning incidents, including anyone who blames religious figures); *Students' plight has become an opportunity for psychological operations*, TASNIM (Mar. 10, 2023) (quoting Ibrahim Azizi, deputy chairman of the National Security Commission in Parliament); *Mohseni Ejei: 82,000 people have been granted amnesty/22,000 of those pardoned are rioters*, ISNA (Mar. 13, 2023) (quoting the head of the Judiciary Mohseni Ejei, who called for “appropriate legal action” against those who spread rumors).

<sup>767</sup> *See supra* note 521 (detailing plain clothes officers, likely part of a security detail, trying to prevent protests in front of the school after the March 1 incident at 13 Aban Girls’ Middle School, and security officials reportedly being at a hospital where a father tried to film his daughter and other girls but was prevented from doing so by the officials in Saqqez, Kurdistan).

<sup>768</sup> *Pardis County Governor: 35 poisoned students have been discharged from the hospital*, IRNA (Mar. 1, 2023) (Doc. 357\_22). National officials similarly threatened anyone who was caught sharing information about the poisonings. *See, e.g., Khatami: Judiciary should deal decisively with rumor-mongers in the students' plight*, TASNIM (Mar. 10, 2023) (quoting Friday prayer leader in Tehran Ahmad Khatami who called for harsh treatment for anyone caught spreading rumors about the poisoning incidents, including anyone who blames religious figures); *Mohseni Ejei: 82,000 people have been granted amnesty/22,000 of those pardoned are rioters*, ISNA (Mar. 13, 2023)

Between March and April 2023, there were also reports of at least nine other Iranian citizens being arrested for sharing videos and other content capturing the poisonings, along with reports that charges were filed against a journalist and three domestic news outlets for reporting on the poisonings.<sup>769</sup>

Even when national investigations finally announced results, they failed to publish critical supporting evidence like toxicology reports, a detailed list of samples gathered, or a description of tests run to analyze the samples, despite requests from local journalists to do so.<sup>770</sup> Nor did those investigations reference additional information that could have supported their conclusions, like interviews from affected students and staff or CCTV footage.

In sum, such efforts go beyond obfuscation of the facts and a failure to be transparent, but instead demonstrate an intentional effort to hide information about the poisonings.<sup>771</sup> This pattern suggests that Iranian officials were attempting to cover up any evidence that might suggest Iranian state organ or agent responsibility.

#### iv. Iranian Officials Abruptly Shifted Explanations

Iranian officials demonstrated abrupt shifts and inconsistent representations of official narratives about the poisonings, moving from calling the acts “intentional” and demanding accountability to reframing them as episodes of mass hysteria or anxiety. Absent corroborating evidence to justify such reversals, these shifts are difficult to reconcile with the ordinary developments of a good-faith investigation. Instead, they appear more like a coordinated communications strategy aimed at deflecting potential inferences of government culpability, and redirecting attention toward an alternative explanation.

The first example of anxiety being used to purportedly explain the poisonings was just days after the first poisoning incident was reported, when local officials in Qom, with no evident medical or scientific basis, attributed girls’ serious continuing symptoms (involving leg numbness and paralysis) to “stress.”<sup>772</sup> For a while, this explanation appeared to be more or less an outlier among accounts provided by various Iranian officials regarding other poisoning attacks.<sup>773</sup> Initial

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(quoting head of the Judiciary Mohseni Ejei, who called for “appropriate legal action” against those who spread rumors); *Students' plight has become an opportunity for psychological operations*, TASNIM (Mar. 10, 2023) (quoting Ibrahim Azizi, deputy chairman of the National Security Commission in Parliament, who urged students to avoid “excessive fear and risky behavior” if they feel unwell and to instead simply tell school officials, seemingly an order to refrain leaving school and expressing distress to others).

<sup>769</sup> See *supra* Part II.B(ii) (detailing the reported arrests made with regards to the poisonings).

<sup>770</sup> See, e.g., *Poisonings that are found to be intentional*, ETEMAD DAILY (reprinted in Akharin Khabar) (Feb. 28, 2023).

<sup>771</sup> Indeed, Parliamentary Commission member Ebrahimi appears to confirm this when he admitted to Rouydad24 that officials “hid” information about the poisonings. See *supra* note 761.

<sup>772</sup> *The latest situation of the poisoned students of Qom/The Provincial Department of Education is following up on the matter*, ISNA (Dec. 3, 2022).

<sup>773</sup> Note that another local official in our cases used this explanation in late February 2023 when telling the media why girls were still in the hospital. See *Remarks of the Deputy Governor of Lorestan Province regarding the news about schools in Borujerd*, IRNA (Feb. 26, 2023) (Doc. 255\_20) (quoting Majid Monemi, the Deputy Governor of Lorestan for Political, Security, and Social Affairs, who said students were simply undergoing further treatment due to “stress”).

results from investigations led by the Ministry of Health, the Parliament, and even Qom local authorities asserted that, rather than stress, the “mild poisoning[s]” were being caused by “gaseous toxins,”<sup>774</sup> possibly a mixture of multiple types of gases;<sup>775</sup> these investigations affirmed that there was “no doubt that poisoning occurred.”<sup>776</sup> However, the day after officials confirmed that poisonings had occurred, the Minister of Interior Ahmad Vahidi contradicted them. Vahidi declared that actually more than 90% of students had not been poisoned but were simply stressed.<sup>777</sup> No evidence was offered for this assertion, and this statement was at odds not only with previous findings announced by other authorities but also with announcements made two days later by the Ministry of Interior itself about its investigation.<sup>778</sup> Yet despite this, in subsequent days, other law enforcement and intelligence officials increasingly aligned themselves with Interior Minister Vahidi’s account and repeated similar assessments with no supporting evidence.<sup>779</sup> After this, other officials appeared to fall in line, repeating the same declarations. The Ministry of Health claimed – contrary to its initial announcements – that, based on undefined “studies,” “less than 10 percent of children” who were reported to have symptoms were actually poisoned.<sup>780</sup> Instead, the Health Ministry asserted, the vast majority of students who experienced symptoms simply saw someone else experiencing symptoms and then became anxious.<sup>781</sup> The Ministry of Interior claimed a day later that an even greater percentage – 95% – of students who said they were unwell had symptoms caused by stress,<sup>782</sup> a percentage then duly repeated by the Ministry of Health with no explanation or additional evidence offered for how it arrived at this percentage.<sup>783</sup> Even Parliament claimed that “stress of the students” was partially to blame, although it did not offer a precise percentage of those whose symptoms were

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<sup>774</sup> *Continuing series on student poisoning/this time in Tehran*, ISNA (Feb. 28, 2023) (reporting Qom investigation initial findings as that the poisoned students “suffered from mild poisoning” from “gaseous toxins”, and reporting the Ministry of Health’s findings, as “a very mild poison caused mild poisoning in the students”); *Sheikhi: The exact cause of the poisoning of Qomi students has not yet been determined*, TASNIM (Feb. 28, 2023) (same). Note that Tasnim reported the Minister of Health’s initial findings very differently, claiming that the Minister of Health attributed most of the incidents to students’ fear. See *Poisoning of students in schools/Family concerns and strange silence from responsible agencies*, TASNIM (Feb. 28, 2023).

<sup>775</sup> *Timeline of the student poisoning incident; everything everyone said from the beginning to today*, ROUYDAD24 (Mar. 10, 2023).

<sup>776</sup> *Continuing series on student poisoning/this time in Tehran*, ISNA (Feb. 28, 2023); *Sheikhi: The exact cause of the poisoning of Qomi students has not yet been determined*, TASNIM (Feb. 28, 2023).

<sup>777</sup> *Vahidi: No one has been arrested in connection with the poisoning of students/Security forces are busy searching for clues*, TASNIM (Mar. 1, 2023).

<sup>778</sup> See, e.g., *Ministry of Interior Statement on the Issue of Student Poisoning/Discovery of Suspicious Samples*, ISNA (Mar. 3, 2023) (reprinting a statement by the Ministry of Interior that explained they were conducting ongoing field investigations and “suspicious samples” had been found and were being tested).

<sup>779</sup> *Sardar Jalali: Poisonings are caused by direct intervention of the current of hypocrisy and hostility*, ISNA (Mar. 5, 2023) (quoting head of the national passive defense organization Gholamreza Jalali, who said that “the opposition” is “fueling social panic through social media and simulating poisonings in other cities”); *We must shed light on the conspiracies of our enemies*, ISNA (Mar. 5, 2023) (quoting Basij Major General Bahman Reyhani, who said “it cannot be denied that the enemies are trying to create an atmosphere of fear and psychological warfare with the aim of forcing the closure of girls’ schools”); *Timeline of the student poisoning incident; everything everyone said from the beginning to today*, ROUYDAD24 (Mar. 10, 2023) (reporting that Deputy Interior Minister for Security said the planners of the “Woman Life Freedom” movement and the students’ poisonings are the same, and their main goal is to “creat[e] psychological insecurity”).

<sup>780</sup> *The substance that caused the students' poisoning was not dangerous*, IRNA (Mar. 6, 2023).

<sup>781</sup> *Id.*

<sup>782</sup> *Latest details on the investigation into student poisoning*, ISNA (Mar. 7, 2023).

<sup>783</sup> *The use of "toxic" and "deadly" substances in schools is prohibited*, TASNIM (Mar. 8, 2023).



purportedly due to stress,<sup>784</sup> as did FARAJA, the national police organization.<sup>785</sup> Importantly, though, not all officials agreed with this purported explanation during this time. A member of the Parliamentary Working Group who self-identified as a doctor said on March 17 that based on blood sample analyses from affected students in Qom and Tehran Provinces, “a series of chemicals has been discovered,” and that “hysterics are not the main cause of the poisonings.”<sup>786</sup> And an ICU specialist told domestic news outlet Ham Mihan that from his perspective, it seemed that girls were being poisoned by a “combination of gases” that are not easily accessible to the public.<sup>787</sup> Prior news reporting, too, ran counter to the claims advanced by the Ministries of Interior and Health; an ISNA reporter who visited affected girls in a hospital in Qom reported that “it’s clear not all symptoms are anxiety-induced.”<sup>788</sup>

A striking element regarding the conclusory announcements about the role of mass anxiety in causing the students’ symptoms was a noticeable shift in how Iranian state-affiliated news media reported on the poisoning incidents. Initially, official news media and government officials admonished those responsible for failing to provide clear and convincing explanations to the public,<sup>789</sup> demanded “accurate reports and convincing answers” from responsible officials,<sup>790</sup> and

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<sup>784</sup> [\*New details about the causes of student poisoning\*](#), ISNA (Mar. 6, 2023) (quoting MP Mohammad Hassan Asaferi, a member of the Commission, who said that “stress of the students” was also partially to blame).

<sup>785</sup> [\*110 people arrested in connection with the “poisoning of students” case/ Stink bugs behind the events\*](#), ISNA (Mar. 15, 2023) (quoting Brigadier General Montazer al-Mahdi, who said that “the majority of [poisonings incidents] were influenced by psychological factors”).

<sup>786</sup> [\*26 provinces and 245 schools were involved in the poisoning/security forces were unable to find any foreign agents/they covered up the issue\*](#), ROUYDAD24 (Mar. 17, 2023).

<sup>787</sup> [\*The mystery of the unknown gas\*](#), HAM MIHAN (Mar. 4, 2023).

<sup>788</sup> [\*“Poisoning Incident” From Anxiety and Delusions to Lack of Work / Briefing Sessions for Teachers to Be Held\*](#), ISNA (Mar. 3, 2023).

<sup>789</sup> See, e.g., [\*What is the cause of the suspicious serial poisonings of students?!/ A “tangerine-like smell” is emitted during poisoning!\*](#), TASNIM (Feb. 13, 2023) (questioning officials’ explanations for what had happened and asking whether two months had not been enough time to investigate the issue and explain to concerned parents what was going on); [\*Poisoning of students in Tehran and Qom/Parents gathered in front of the Qom Governor’s Office\*](#), TASNIM (Feb. 14, 2023) (casting doubt on officials’ explanation for an incident that occurred in Tehran); [\*The Confusing Tangle of the Poisoning of Qom Students/An Incident Whose Cause is Not Known After 70 Days\*](#), TASNIM (Feb. 9, 2023) (admonishing officials for failing to clarify the cause of the incidents in Qom); [\*Poisoning of Students in Schools/Family Concerns and Strange Silence from Responsible Agencies\*](#), TASNIM (Feb. 28, 2023) (blaming officials’ lack of clear information to the public for the ongoing chaos, writing that none of the relevant officials have “spoken openly and transparently”); [\*Poisoning Incident “From Anxiety and Delusions to Lack of Work” / Briefing Sessions for Teachers to Be Held\*](#), ISNA (Mar. 4, 2023) (criticizing local officials for denying incidents and explaining that what families and students are angry about is “the lack of proper information and clarification about the events that have occurred”).

<sup>790</sup> [\*The Causes and Perpetrators of Student Poisoning Should Be Introduced to the Public\*](#), ISNA (Mar. 1, 2023) (quoting MP for Tehran Mohsen Pirhadi); see also [\*Mohammadiari: There Should Be Transparency About Poisoning of Students in Schools\*](#), ISNA (Mar. 3, 2023) (quoting MP for Talesh and Rezvanshahr Hassan Mohammadiari in a speech to Parliament in which he urged officials to “give [the public] a convincing answer as to what the solution [...] is”); [\*Security Officials Should Clarify the Dimensions of the Student Poisoning Incident\*](#), IRNA (Mar. 3, 2023) (quoting Ayatollah Qurban Ali Dari of Najafabadi who said that officials needed to “keep people informed about the details of the incidents,” because the “lack of timely information” and authorities’ failure to convince the public about what happened has caused “public dissatisfaction”); [\*Officials Should Get to the Root of the School Poisoning Issues/People Should Not Enter the Risky Foreign Exchange Market\*](#), ISNA (Mar. 3, 2023) (referring to a statement by Grand Ayatollah Jafar Sobhani, who called for “accurate information” about the poisonings).



referred to the poisonings as “intentional.”<sup>791</sup> However, official media sources made an abrupt shift just days later, instead emphasizing the role of social panic or mass hysteria in the poisonings<sup>792</sup> and blaming media outlets for causing panic,<sup>793</sup> urging parents and students instead to “ignore rumors” and look only to official sources for news.<sup>794</sup> Government officials shifted their public positions so abruptly<sup>795</sup> that Iranian domestic news outlets – including state-affiliated

<sup>791</sup> See *The Story of Serial Poisonings, Roots and Possibilities*, IRNA (Mar. 1, 2023) (reporting that apart from the Minister of Education, “the statements of other relevant officials indicate the matter was intentional”); see also *Poisonings that are found to be intentional*, AKHARIN KHABAR (Feb. 28, 2023) (quoting Prosecutor-General Mohammad Jafar Montazeri, who said that “the poisoning of Qom students is probably intentional and a criminal act”); *Chemical compounds responsible for poisoning Oomi students*, IRIB (Feb. 26, 2023) (reporting that Deputy Minister of Health and Medical Education Younes Panahi stated that while the investigations are ongoing, “what has been proven is [there is] a chemical compound”); *The causes and perpetrators of student poisoning should be introduced to the public*, ISNA (Mar. 1, 2023) (quoting Tehran MP Mohsen Pirhadi, stating that the “repetition of the incidents ... in several other cities ... has refuted any suspicion that it was unintentional”);

<sup>792</sup> See, e.g., *How can “general hysteria” cause or exacerbate symptoms similar to poisoning?* TASNIM (Mar. 5, 2023) (alleging that girls may be feeling symptoms of poisoning in this “toxic” media environment with even the “slightest natural and everyday occurrence”); *Why do hostile media insist on using the term “chemical attack” on girls’ schools?*, ISNA (Mar. 5, 2023) (alleging that “the intense psychological atmosphere has led to fear and panic”); *Revisiting global examples of “mass hysteria” with symptoms of illness or poisoning*, TASNIM (Mar. 6, 2023) (detailing a list of other examples of “mass hysteria” around the globe where individuals claimed they had symptoms of illness or poisoning); *American researcher examines poisoning scenarios in girls’ schools + video*, IRNA (Mar. 7, 2023) (interviewing American psychologist Robert Bartholomew, who said that “mass mental illness is most likely the main cause of these events, especially considering during these three and a half months no one has been arrested, no chemical substance has been detected, and you see that most of the young girls ... have recovered quickly”); *Psychological effects of serial poisoning of students/Let’s bring peace back to schools with empathy*, ISNA (Mar. 10, 2023) (featuring an interview with a psychologist at the University of Tehran, who attributed the poisonings to a “psychological” phenomenon); *The incidents in some girls’ schools are due to psychological sensitivity/there is no poisoning involved*, IRNA (Mar. 11, 2023) (quoting psychologist Gholamali Afrooz also at the University of Tehran, who stated that “this issue is not a poisoning, and we should not use this term for this issue”).

<sup>793</sup> See, e.g., *President announces authority to investigate student poisoning*, TASNIM (Mar. 1, 2023) (explaining that “a large part of this issue has resulted from a negative psychological atmosphere, and the media should be more attune to this risk”); *How can “general hysteria” cause or exacerbate symptoms similar to poisoning?*, TASNIM (Mar. 4, 2023) (blaming the “widespread dissemination of news about the poisonings” by “hostile media and some social networks” for causing “public hysteria” about this issue); *An analysis of media approaches to the student poisoning scandal: “Inverted Horseshoe Pursuit,”* IRNA (Mar. 6, 2023) (blaming certain domestic and foreign news outlets for the current situation and claiming they were seeking to “assassinate” the regime’s reputation); *From distress to poisoning and fabricating deaths in cyberspace*, IRIB (Mar. 9, 2023) (claiming that the “freedom of cyberspace in Iran” had created the opportunity for “lies, slander, and incitement” regarding student poisonings and these were trying to disrupt public security).

<sup>794</sup> See, e.g., *Students’ families should remain calm and avoid paying attention to rumors*, IRNA (Mar. 5, 2023) (reporting on an incident in Ilam Province, but in the article emphasizing that “the important thing is for families to control and manage their own and their children’s peace” and encouraged families not to worry and ignore rumors); *What was the story of the poisoning of students at Payam Shahed School in Isfahan?* TASNIM (Mar. 5, 2023) (urging parents and students to “avoid paying attention false news and rumors that are being spread with the aim of causing fear, stress, and discrediting the educational environment, and [to] maintain peace for themselves and their children”); *Rumors of poisoning in Kerman schools*, IRIB (Mar. 6, 2023) (denying a poisoning occurred in Kerman and urging families “not to pay attention to rumors”).

<sup>795</sup> See, e.g., *Qom Representative: Serial poisoning of students is suspicious*, Tasnim (Feb. 7, 2023) (quoting the MP for Qom Ahmad Amirabadi Farahani stating that the “poisoning of students in Qom is suspicious”), but see *Poisoning of students in Tehran and Qom/Parents gathered in front of Qom Governor’s Office*, TASNIM (Feb. 14, 2023) (quoting the same official, who claimed that the poisoning incidents are being “exaggerated” and that the issue can be called a “phobia”); see also *Chemical compounds responsible for poisoning Oomi students*, IRIB (Feb. 26, 2023) (quoting Deputy Minister of Health and Medical Education Younes Panahi, who stated that based on the ongoing investigations, “some people wanted all schools, especially girls’ schools, to be closed,” and that while the

news – assumed that they had been forced to do so.<sup>796</sup> This clear shift in messaging, documented above in Part II and in more detail in Appendix C, appears to have lacked an evidentiary foundation. Instead, the pattern of communications suggests the possibility of deliberate attempts behind the scenes to reframe the poisonings not as a serious security and public health risk but a crisis rooted in student anxiety and mass hysteria.

## v. Iran's Implausible Explanations Do Not Explain the Poisoning Incidents

Finally, Iran's eventual explanations for the poisonings are highly implausible, and fail to provide an adequate account of the incidents. Indeed, the explanations disregard what IRNA identified in early March as a reasonable possibility: given the apparent professionalism of the incidents, the poisonings could have been carried out by an internal security service within Iran.<sup>797</sup> The inadequacy of Iran's explanations raises serious questions about potential intentional distortion or suppression of the facts, and suggests that the actual cause may involve the actions of a state organ or agent.

### 1. Mass Hysteria Does Not Easily Explain the Poisoning Incidents

Both the Ministries of Health and Interior claimed in their national investigations that the vast majority of all reported poisoning incidents (90-95%) were attributable to mass hysteria and not to poisoning, a claim that was more or less repeated by the Ministry of Intelligence.<sup>798</sup> To support this claim, the Ministry of Intelligence asserted that no toxic substance capable of causing poisoning was observed, the average length of stays in health clinics was just two hours, and in nearly every case, teaching staff were not affected.<sup>799</sup> Ultimately, it is difficult to tell, without transparent toxicology reports and other independent sample analyses, whether causes other than poisoning, such as mass hysteria, could have played a role in these incidents, and how significant of a role such a cause may have played. We lack a sound evidentiary basis for completely ruling out this account. Indeed, psychologists have, in other contexts, acknowledged

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investigations are ongoing, “what has been proven is a chemical compound” is responsible for the incidents); *but see The Story of Serial Poisonings, Roots and Possibilities*, IRNA (Mar. 1, 2023) (reporting that Panahi retracted his first statement a day later, saying instead that “What I have been quoted about the external causes of these poisonings and their intentionality is not confirmed, and there has been no such quote”); *The causes and perpetrators of student poisoning should be introduced to the public*, ISNA (Mar. 1, 2023) (quoting MP for Tehran Mohsen Pirhadi saying that the “repetition of the incidents ... in several other cities ... has refuted any suspicion that it was unintentional”); *but see Pirhadi: Information about the dimensions of student poisoning is slow*, ISNA (Mar. 11, 2023) (quoting MP Pirhadi contradicting his earlier assessment, instead attributing the incidents as partially caused by “the enemy’s psychological operations” and partially based in reality); *Timeline of the student poisoning incident; everything everyone said from the beginning to today*, ROUYDAD24 (Mar. 10, 2023) (reporting that on March 7, an epidemiologist in Iran, Dr. Mohammad Reza Hashemian, changed his initial stance from saying that access to the substances that caused the poisoning was not possible for ordinary people, to saying in an Instagram post that “objective observations and clinical research show that 90% of student poisonings are caused by stress and hysteria, not inhalation of a toxic substance”).

<sup>796</sup> *Political poisoning!*, TABNAK NEWS (Mar. 2, 2023) (reporting that Panahi was clearly forced to retract his statement, demonstrating officials’ “lack of transparency and concealment” around the poisoning investigations); *The Story of Serial Poisonings, Roots and Possibilities*, IRNA (Mar. 1, 2023) (reporting that “public opinion assessed [Panahi’s] second statement as being under pressure and did not take it seriously”).

<sup>797</sup> *The Story of Serial Poisonings, Roots and Possibilities*, IRNA (Mar. 1, 2023).

<sup>798</sup> Specifically, the Ministry of Intelligence claimed that “non-toxic agents” caused panic and mass hysteria played an important role.

<sup>799</sup> *Ministry of Intelligence’s explanatory statement regarding school incidents in the country*, ISNA (Apr. 28, 2023).

the challenges with differentiating toxic gas exposure from mass hysteria, given the significant overlap in symptoms for both.<sup>800</sup> However, based on the open-source evidence we collected, there are several reasons why concluding that mass hysteria caused the vast majority of poisoning incidents is implausible. They are detailed below.

a. Toxic Agents Were Reportedly Identified by Iranian Officials

First, contrary to the Health, Interior, and Intelligence Ministries' conclusions, officials did initially report that toxic agents had been detected, i.e., that the students had indeed experienced poisonings. On February 26, the Ministry of Health stated that through its ongoing investigation, it had discovered chemical compounds that were not war-related or contagious, nor were they viral or microbial.<sup>801</sup> On February 28, Qom officials announced that according to their ongoing investigations, the students had suffered "mild poisoning" from "gaseous toxins," and that there was "no doubt that a poisoning had occurred."<sup>802</sup> The Ministry of Health on the same day similarly stated that a "mild poison had caused mild poisoning in the students,"<sup>803</sup> and a member of the Parliamentary Commission claimed that ammonia had been detected in schools.<sup>804</sup> On March 3, the Ministry of Interior claimed that it discovered "suspicious samples" in its field investigations.<sup>805</sup> On March 6, an ophthalmologist serving on the Ministry of Health's investigation said that the toxin was inhaled by students and reduced antioxidants in the blood, causing an array of symptoms.<sup>806</sup> And on March 17, a member of the Parliamentary Health Commission who claimed to also be a doctor said that "a series of chemicals have been discovered in the blood in studies [conducted] in Qom and Tehran," and that "hysterics are not the main cause of this poisoning."<sup>807</sup> It is notable that the Interior and Health Ministries' conclusions contradict other Iranian officials' earlier findings and statements about those findings.

b. Teachers and School Staff Were Also Reportedly Affected

Second, it does not appear to be true that "in nearly every case" teaching staff were not affected. In three of our thirteen cases, there were reports, including from state-affiliated news media, that teachers and other school staff also experienced symptoms.<sup>808</sup> Beyond our cases, media reports

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<sup>800</sup> See Robert Bartholomew & Simon Wessely, *Protean Nature of Mass Sociogenic Illness*, 180 BRITISH J. PSYCHIATRY 300, 301 (2002) <https://www.cambridge.org/core/journals/the-british-journal-of-psychiatry/article/protean-nature-of-mass-sociogenic-illness/2BDC2262E104B8A33F3DD49773DA0D8B>.

<sup>801</sup> *Deputy Minister of Health: Qomi students' poisoning was caused by available chemical compounds*, IRNA (Feb. 26, 2023).

<sup>802</sup> *Continuing series on student poisoning/this time in Tehran*, ISNA (Feb. 28, 2023); *Sheikhi: The exact cause of the poisoning of Qomi students has not yet been determined*, TASNIM (Feb. 28, 2023).

<sup>803</sup> *Continuing series on student poisoning/this time in Tehran*, ISNA (Feb. 28, 2023).

<sup>804</sup> *The Story of Serial Poisonings, Roots and Possibilities*, IRNA (Mar. 1, 2023). Note that this claim had been denied several weeks ago in a Tasnim article, although it's not clear on what grounds. See *Ammonia gas is not the cause of poisoning of Qom students*, TASNIM (Feb. 6, 2023).

<sup>805</sup> *Ministry of Interior Statement on the Issue of Student Poisoning/Discovery of Suspicious Samples*, ISNA (Mar. 3, 2023).

<sup>806</sup> *The substance that caused the students' poisoning was not dangerous*, IRNA (Mar. 6, 2023).

<sup>807</sup> *26 provinces and 245 schools were involved in the poisoning/security forces were unable to find any foreign agents/they covered up the issue*, ROUYDAD24 (Mar. 17, 2023).

<sup>808</sup> @Ettehad, TELEGRAM (Dec. 13, 2022) <https://t.me/ettehad/109929> (Doc. 287\_03); *Repeated poisoning of students at a girls' vocational school in Qom*, QOMNA NEWS (Dec. 13, 2022) (Doc. 287\_08); *Poisoning of 51 students and staff of Noor Vocational School in Qom*, IRIB (Dec. 14, 2022) (Doc. 287\_01); *Most of the poisoned schoolgirls in Qom have been discharged from the hospital*, IRNA (Dec. 13, 2022) (Doc. 287\_22) (reporting that

about other incidents, including in state-affiliated news media, report at least six more cases in which school staff were afflicted during poisoning incidents.<sup>809</sup> While not conclusive, these reports contradict the assertion that “in nearly every case” teaching staff were not affected. Instead, the evidence suggests alternative explanations for the apparent absence of reports from teaching staff. Multiple sources, including domestic news outlets and international human rights organizations, indicate that teachers were subjected to threats and intimidation by state authorities, and were instructed not to speak publicly about the incidents.<sup>810</sup> These circumstances could reasonably account for the relative lack of formal statements by and reporting about affected teaching staff.

### c. Hospital Durations Appear Longer Than Claimed

Third, the duration of hospital stays appear to have been longer than what is claimed by the Ministry of Intelligence, which asserted that the average stay for affected students was just “two hours” at health clinics. It is not clear where these data came from, including which cases and the number of affected students. Evidence from our cases casts doubt on the claim, although a larger, more representative dataset would be needed to assess this claim. In seven of our cases, students were reported to have remained in the hospital for at least 24 hours, a far longer stay than 2 hours.<sup>811</sup> And in three of our cases, students were reported to still be experiencing symptoms

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three teachers fell ill but were treated as out-patients); *Stink Bombs: New details about the poisoning incident of schoolgirls at two high schools and one elementary school in Borujerd*, HAM MIHAN (Feb. 27, 2023) (Doc. 255\_16) (eyewitness students said that the principal and another teacher or vice principal were also hospitalized); *Accounts of the female students of 13 Aban High School about the poisoning*, MEHR (Mar. 4, 2023) (Doc. 359\_31) (school administrator told the reporter that a teacher was sent home during the incident because they were “unwell”).

<sup>809</sup> See, e.g., *By order of the leadership, the perpetrators of the student poisoning must be identified immediately*, ISNA (Mar. 6, 2023) (quoting Deputy Chairman of Parliament’s Social Commission Vali Esmaili who said “this is a reality that is happening,” explaining that he had recently been to a hospital treating affected students and two teachers); *Continuation of the series on poisoning of Oomi students/ 7 students and a teacher were poisoned*, TASNIM (Feb. 1, 2023) (reporting on another incident in Qom, calling it a poisoning and reporting that a teacher also was sent to the hospital); *Iran: School Girls Continue to Face Chemical Attacks, Officials Refuse to Provide Security*, CENTER FOR HUMAN RIGHTS IN IRAN (Apr. 24, 2023) (reporting about three different incidents in which teachers and/or staff reported falling ill, with one still experiencing symptoms well after the incident occurred); *“Poisoning Incident” From Anxiety and Delusions to Lack of Work / Briefing Sessions for Teachers to Be Held*, ISNA (Mar. 3, 2023) (interviewing a school administrator from an undisclosed school in Qom who told the reporter that when a poisoning incident happened at their school, they experienced nausea and dizziness for two days and at least two other teachers experienced symptoms).

<sup>810</sup> *“Poisoning Incident” From Anxiety and Delusions to Lack of Work / Briefing Sessions for Teachers to Be Held*, ISNA (Mar. 3, 2023) (claiming that all teachers and school administrators except for one cancelled scheduled interviews with the reporter, and saying that teachers were afraid to speak out, “fearing consequences” of doing so); *Iran: School Girls Continue to Face Chemical Attacks, Officials Refuse to Provide Security*, CENTER FOR HUMAN RIGHTS IN IRAN (Apr. 24, 2023); see also Nima Elbagir et. al., *Medics, Teachers, Parents Accuse Iran Government of Silencing Victims of Suspected Poisoning Attacks*, CNN (Mar. 7, 2023) <https://www.cnn.com/2023/03/06/middleeast/hfr-iran-suspected-poisoning-girls-schools-intl/index.html>. Indeed, a manual reportedly provided to school administrators appears to instruct school teachers and administrators to refrain from speaking publicly about the incidents. See *Hotline 1570 is ready to provide telephone counseling to families in recent school incidents*, TASNIM (Mar. 13, 2023) (detailing the official incident manual allegedly distributed, encouraging school administrators from making “non-expert comments” about the poisonings).

<sup>811</sup> *What did the poisoned students from Qom say about the repeated incident at Noor Technical School?* ISNA (Dec. 15, 2022) (Doc. 287\_19) (ISNA reporting that girls were still in the hospital the following day after the December 13 incident in Qom and were still experiencing symptoms like leg numbness and trouble walking); *Remarks by the Deputy Governor of Lorestan Province regarding the news about schools in Borujerd*, IRNA (Feb. 26, 2023) (Doc. 255\_20) (quoting Deputy Governor of Lorestan Province Majid Monemi, who said that students



days later.<sup>812</sup> Even Ministry of Health officials announced on March 6, during their investigation, that students were discharged on average six hours after hospitalization, contradicting the Ministry's finding and casting doubt on the veracity of the claim.<sup>813</sup>

d. Mass Hysteria Does Not Explain All Students' Symptoms

Fourth, students' apparent loss of their ability to move their legs or leg numbness, symptoms that are both visible in videos and reported by state-affiliated news outlets,<sup>814</sup> do not necessarily align with those associated with mass hysteria, and instead suggest that at least some students were exposed to some sort of toxic agent. Admittedly, mass hysteria may produce a range of symptoms, some of which we do see in our cases: In other incidents where mass hysteria was considered a probable cause, subjects demonstrated symptoms similar to our cases like vomiting, nausea, dizziness, and headaches<sup>815</sup> (although note that there remains disagreement about whether these other incidents were instances of mass hysteria or whether they were actually caused by chemical agents).<sup>816</sup> And in a prior incident in Iran widely believed to have been an

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from Ahmadiyya Girls' High School in Borujerd, Lorestan were still undergoing treatment a day later but it was because of "stress"); *What is the story behind the poisoning of students in Pardis?* TASNIM (Feb. 28, 2023) (Doc. 357\_23) (reporting that most but not all of the 35 students who were taken to the hospital from Khayyam Girls' High School in Pardis, Tehran, were discharged by 3 PM, four hours after the incident reportedly occurred); *Pardis County Governor: 35 poisoned students have been discharged from the hospital*, IRNA (Mar. 1, 2023) (Doc. 357\_22) (reporting that two students stayed in the hospital overnight); Citizen Journalist, *Anger over Saqqez School Poisonings Triggers more Security, Censorship*, IRAN WIRE (Apr. 10, 2023) (Doc. 220\_30) (local journalist reporting that the head of Saqqez's health services told her all students from Ma'raj Girls' High School were discharged the same day, but other sources told her that wasn't true and that some students remained overnight); *What was the cause of the student poisoning in Shahinshahr?* ISNA (Apr. 15, 2023) (Doc. 143\_27) (reporting that according to Shahinshahr MP Ali Haji Deligani, 170 students were sent to the hospital and all but 10 were later discharged, with seven remaining overnight); *see also* ); *Leak of 'mercaptan' was the cause of the unpleasant odor in Shahinshahr*, TASNIM (Apr. 13, 2023) (Doc. 143\_30) (same).

<sup>812</sup> See, e.g., *What did the poisoned students from Qom say about the repeated incident at Noor Technical School?* ISNA (Dec. 15, 2022) (Doc. 287\_19) (reporting that girls remaining in the hospital the next day from Noor Girls' School in Qom reported feeling leg numbness and difficulty walking); *The Minister Apologized, the Desks Emptied: Accounts from school principals, teachers, and students' families about classrooms after the poisoning incidents*, HAM MIHAN (Mar. 6, 2023) (Doc. 255\_19) (interviewing the mother of a student from Ahmadiyya Girls' High School in Borujerd who said that 10 days later her daughter is still experiencing the effects from the poisoning); *Stink Bombs: New details about the poisoning incident of schoolgirls at two high schools and one elementary school in Borujerd*, HAM MIHAN (Feb. 27, 2023) (Doc. 255\_16) (quoting MP for Borujerd Fatemeh Maghsoudi, who said some girls were still experiencing residual coughing and dizziness a day later).

<sup>813</sup> *The substance that caused the students' poisoning was not dangerous*, IRNA (Mar. 6, 2023) (reporting the Ministry of Health's statement that most students exposed to the toxin were "discharged within six hours of hospitalization," not two hours, as the Ministry of Intelligence claimed).

<sup>814</sup> See *supra* Part I.C (listing out the symptoms visible in videos from our cases as well as those reported by state- and IRGC-affiliated media outlets).

<sup>815</sup> Trudy Rubin, *'Poison' Controversy is Latest Symptom of Distrust on the West Bank*, CHRISTIAN SCIENCE MONITOR (Apr. 5, 1983) <https://www.csmonitor.com/1983/0405/040561.html> (detailing symptoms including fainting, drowsiness, nausea, stomach aches, and blurred vision); Amy Friedman, *Taliban Terror or Mass Hysteria: Who is Poisoning Afghanistan's Girls?* TIME (July 6, 2012) <https://world.time.com/2012/07/06/taliban-terror-or-mass-hysteria-who-is-poisoning-afghanistans-girls/#:~:text=In%20June%2C%20over%20100%20students,to%20events%20such%20as%20these> (describing symptoms such as vomiting, fainting, headaches, fatigue, dizziness).

<sup>816</sup> See, e.g., Trudy Rubin, *supra* note 815 (quoting Dr. Moban, Director General of Israel's Health Ministry, who said that there was "no evidence of a poisonous agent" and he believed it was a mass social or psychological phenomenon, but also referencing Dr. Hussein Obeid, a London-trained Palestinian director of public health services, who traveled to the area the day afterwards and said he smelled a "strong, irrigating smell" and felt a



episode of mass hysteria, girls experienced symptoms that included headaches (along with, importantly, symptoms not seen in our cases).<sup>817</sup> Yet contrary to what one would expect based on information provided by a psychologist interviewed by Tasnim,<sup>818</sup> who stated that mass hysteria typically involves symptoms that disappear after a few hours, girls in Iran were reported to have experienced symptoms over 24 hours later, both in several of our cases<sup>819</sup> and in other cases as well.<sup>820</sup> While not conclusive, such evidence casts doubt on official claims that the vast majority of girls' symptoms were attributable to mass hysteria.

## 2. "Non-Toxic Agents" Do Not Explain Symptoms and Odors Reported in Our Cases

The Ministry of Intelligence, along with the Ministries of Health and Interior, claimed that the 5%-10% of incidents that were not a manifestation of mass hysteria were caused by "non-toxic agents" such as stink bombs, pepper spray, or tear gas. It is possible that such agents were used; as with mass hysteria, we cannot know for certain without toxicology assessments of

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"burning sensation" and an Israeli nurse with whom he traveled also smelled it and was affected by the unknown substance); *see also* Amy Friedman, *Taliban Terror or Mass Hysteria: Who is Poisoning Afghanistan's Girls?* TIME (July 6, 2012) <https://world.time.com/2012/07/06/taliban-terror-or-mass-hysteria-who-is-poisoning-afghanistans-girls/#:~:text=In%20June%2C%20over%20100%20students,to%20events%20such%20as%20these> (referencing the World Health Organization, which tested water, blood, and urine samples provided by 32 of the 34 schools affected and found no evidence of toxic agents, attributing the incidents in Afghanistan to mass hysteria), *but see* Jon Boone, *Taliban Poison Attack or Mass Hysteria? Chaos Hits Another Kabul Girls' School*, GUARDIAN (Aug. 25, 2010) <https://www.theguardian.com/world/2010/aug/25/taliban-poison-attack-girls-school> (interviewing a doctor who treated girls in earlier incidents, who said that he was familiar with mass hysteria but he believed most of the girls who experienced symptoms were affected by a toxic agent).

<sup>817</sup> M.T. Yasamy, A. Bahranezhad, and H. Ziaadini, *Postvaccination Mass Psychogenic Illness in an Iranian Rural School*, 5 LA REVUE DE SANTE DE LA MEDITERRANEE ORIENTALE, 710, 712 (1999) [https://applications.emro.who.int/emhj/0504/emhj\\_1999\\_5\\_4\\_710\\_716.pdf](https://applications.emro.who.int/emhj/0504/emhj_1999_5_4_710_716.pdf) (detailing additional symptoms including blurred vision, tremors, and pseudo-seizures).

<sup>818</sup> *American researcher examines poisoning scenarios in girls' schools + video*, IRNA (Mar. 7, 2023).

<sup>819</sup> *See What did the poisoned students from Qom say about the repeated incident at Noor Technical School?* ISNA (Dec. 15, 2022) (Doc. 287\_19) (reporting that girls were still in the hospital the following day after the December 13 incident in Qom and were still experiencing symptoms like leg numbness and trouble walking); *Remarks by the Deputy Governor of Lorestan Province regarding the news reports about schools in Borujerd*, IRNA (Feb. 26, 2023) (Doc. 255\_20) (quoting Deputy Governor of Lorestan Province Majid Monemi, who said that students from Ahmadiyya Girls' High School in Borujerd, Lorestan Province, were still undergoing treatment a day later); *Stink Bombs: New details about the poisoning incident of schoolgirls at two high schools and one elementary school in Borujerd*, HAM MIHAN (Feb. 27, 2023) (Doc. 255\_16) (The day after the incident, the MP for Borujerd Fatema Maghsoudi reported that some students were still experiencing residual coughing and dizziness); *The Minister Apologized, the Desks Emptied: Accounts from school principals, teachers, and students' families about classrooms after the poisoning incidents*, HAM MIHAN (Mar. 6, 2023) (Doc. 255\_19) (interviewing the mother of a student from Ahmadiyya Girls' High School in Borujerd who said that 10 days later her daughter is still experiencing the effects from the poisoning); *Pardis County Governor: 35 poisoned students have been discharged from the hospital*, IRNA (Mar. 1, 2023) (Doc. 357\_22) (reporting that two students were held overnight); *What was the cause of the student poisoning in Shahinshahr?* ISNA (Apr. 15, 2023) (Doc. 143\_27) (reporting that according to Shahinshahr MP Ali Haji Deligani, 170 students were sent to the hospital and all but 10 were later discharged, with seven remaining overnight); *see also* Robert Bartholomew & Simon Wessely, *supra* note 800 (noting that mass hysteria symptoms tend to disappear quickly).

<sup>820</sup> *"Poisoning Incident" From Anxiety and Delusions to Lack of Work / Briefing Sessions for Teachers to Be Held*, ISNA (Mar. 3, 2023) (ISNA reporter visited Qom and interviewed affected girls and mothers from different cases, reporting that at least five students experienced symptoms days later, including numbness in legs, difficulty breathing, headaches, dizziness, and difficulty walking); *The mystery of the unknown gas*, HAM MIHAN (Mar. 4, 2023) (reporting that a student was still in the ICU several days after a reported incident in Tehran).

representative samples from the girls and the schools. However, based on evidence from our cases, there is reason to doubt that tear gas or pepper spray were solely responsible. As discussed in Part I, exposure to these agents does not inhibit one's motor functions or cause numbness, a symptom both seen and reported in many of our cases, including by state-affiliated news outlets. In addition, eye and/or skin irritation, common symptoms of exposure to tear gas or pepper spray, are absent from videos capturing our cases, and eye irritation is only reported as a symptom in two cases.<sup>821</sup> Only one state-affiliated news source we identified for our cases mentions eye irritation as a symptom.<sup>822</sup> While this evidence does not rule out the possibility that tear gas and/or pepper spray were used in some instances, it does undermine the assertion that those toxic agents were the sole cause of the cases which, even by the government's own admission, involved exposure to an external chemical agent.

### 3. *Failure to Consider Alternative Possible Causes for Incidents*

Finally, Iranian officials blamed the incidents that were not, per the government's view, caused by mass hysteria, on students trying to get out of class (or else people trying to provoke protests and stoke internal insecurity). Iranian officials did not release the names of the vast majority of perpetrators allegedly arrested, nor could we find information about whether any individuals purportedly arrested were ever tried and convicted, so we are not able to assess individual claims about whether this was in fact the motivation of those the Iranian government alleged were responsible. However, even other Iranian officials did not appear to find the explanation that blamed students credible. An MP from Parliament's Working Group admitted as much, accusing security personnel in April of being preoccupied with the belief that students were responsible, which according to him, the Working Group found "unacceptable."<sup>823</sup>

Regardless, what is clear is that Iranian officials failed to consider all categories of perpetrators considered to be credible possibilities at the time, including the possibility that the incidents were perpetrated by members of an internal security agency.<sup>824</sup> The fact that this possibility – one that also appeared to have been believed by bystanders of the incidents, who can be heard in videos from our cases accusing the Iranian government of responsibility – was absent from any official investigation was striking. It suggests that officials intentionally ignored it and attempted to propose alternative explanations that were not credible, in order to divert attention away from possible state involvement.

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<sup>821</sup> See [\*The continued chemical attacks on girls' schools and the inaction of government officials in ensuring student safety\*](#), CENTER FOR HUMAN RIGHTS IN IRAN (Apr. 25, 2023) (Doc. 147\_01); [\*Hajer and 13 Aban schools were also added to the list of poisonings / The school officials were only trying to evacuate the school and calm the situation / The smell of rotten eggs filled the air / The children were foaming at the mouth\*](#), SHARGH DAILY (Mar. 1, 2023) (Doc. 359\_32); [\*The latest news on the poisoning of students today, 10 Esfand 1401 \(March 1, 2023\)\*](#), TEJARAT NEWS (Mar. 1, 2023) (Doc. 359\_08).

<sup>822</sup> [\*Tasnim reporter's account from in front of a school in Tehran's Tehransar neighborhood / The complex mystery of student poisonings\*](#), TASNIM (Mar. 1, 2023) (Doc. 359\_29). Note as well that this Tasnim article casts doubt on the incident on which it reports.

<sup>823</sup> See [\*It is unacceptable to say that the cause of the students' poisoning was balloons\*](#), MOSTAGHAL (Apr. 11, 2023).

<sup>824</sup> See [\*The Story of Serial Poisonings, Roots and Possibilities\*](#), IRNA (Mar. 1, 2023) (speculating that given the professionalism of the incidents, they could have been carried out by an internal security service).

## vi. Conclusion and Implications of Circumstantial Evidence Indicating State Responsibility

The pattern of government responses to the poisoning incidents provides plausible grounds to suggest that Iran's state organs or agents may have carried out these poisonings. The state's failure to properly investigate, despite having a powerful internal intelligence apparatus, coupled with efforts to restrict information about the incidents, suggests that the state was not genuinely interested in figuring out what was going on, and instead focused on covering the incidents up. The existence of a powerful domestic intelligence apparatus also makes it unlikely that a non-state actor could have carried these poisonings out across Iran and remain undetected. Abrupt shifts in explanations without supporting evidence by officials and state-affiliated news outlets indicate that the government may have been working to deflect suspicions about state agent culpability and focus the public's attention on other explanations. It also suggests the possibility that the poisoning incidents may have been clandestine operations carried out by some government actors that other government agencies were not initially aware of, and that officials had to revise their public statements about the poisonings as information about state actor involvement became more widely known within the government. Finally, the state's eventual explanations do not align with the evidence, suggesting intentional concealment of the actual cause.

If a state organ or agent carried out the poisonings, it was by no means necessary that such actions would have been carried out in a coordinated matter that was orchestrated throughout the government. This could explain the contradictions among officials themselves about what was going on. Conceivably, the poisonings could have been carried out by individual officials or units acting independently within organizations like the IRGC, units of which are documented by researchers to operate semi-autonomously with limited command structure and with impunity for unsanctioned violence carried out against Iranian citizens.<sup>825</sup> According to Iranian researcher Alemzadeh, the IRGC and its domestic subsidiary the Basij were active in repressing the "Woman, Life, Freedom" movement at this time, and this repression included individual agents carrying out acts of violence against protesters seemingly on their own, without orders to do so.<sup>826</sup>

Assuming Iranian government organs or agents carried out these poisonings, one question that has no clear answer is *why* state organs or agents may have intentionally poisoned schoolgirls. Possibly, a desire to inflict punishment for and deter ongoing protests, some of which were led

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<sup>825</sup> See Maryam Alemzadeh, *supra* note 759 (detailing the decentralized nature of the IRGC and the lack of command structure, along with the embrace of unsanctioned acts of violence against civilians and the absence of impunity for these acts by IRGC members); see also Ben Hubbard and Farnaz Fassihi, *Iran's Loyal Security Forces Protect Ruling System That Protesters Want to Topple*, N.Y. TIMES (Oct. 24, 2022) <https://www.nytimes.com/2022/10/17/world/middleeast/iran-protests-revolutionary-guards.html>.

<sup>826</sup> *Id.*; see also Maddie Wong et. al., *The Blinding of Protesters and Bystanders in Iran*, BERKELEY HUMAN RIGHTS CENTER (Sept. 2024) <https://humanrights.berkeley.edu/publications/the-blinding-of-protesters-and-bystanders-in-iran/> (detailing 124 blinding incidents during the "Woman, Life, Freedom" movement); Jess Peake et. al., *Disappearances, Deaths, and Denials*, THE DIGITAL INVESTIGATIONS LAB, UCLA LAW SCHOOL (Jan. 2025) <https://law.ucla.edu/sites/default/files/PDFs/ICLP/FINAL-Disappearances-Deaths-and-Denials.pdf> (documenting 135 cases of likely cases involving the deaths or disappearances of minors in Iran during the "Woman, Life, Freedom" movement).

by teenage girls in their schools,<sup>827</sup> could have motivated the poisonings. However, this answer is not fully satisfying, given that the regime had at its disposal, and in fact used, other tools to punish and deter protesters during that time. Nevertheless, individual state agents or security force units could have been frustrated with the situation and concluded that the use of chemical agents would be a particularly shocking means of intimidating the population, and taken action, possibly with the hope of creating a ‘chilling effect’ on future protests at schools. In any case, the absence of a clear *why* means that state agent or organ involvement remains plausible, but not entirely obvious.

### C. Iran Failed to Meet its Human Rights Due Diligence Obligations Even if the Poisonings Are Not Attributable to the Government: Iran Did Not Ensure Respect for Human Rights

The human rights treaties to which Iran is a party do not only prohibit Iranian government officials themselves from violating the human rights of persons in Iran. Iran must also ensure the fulfillment of human rights protected under the ICCPR and the CRC. This means that Iran must ensure respect for human rights protected under the ICCPR and the CRC, including in some cases from infringement by non-state actors.<sup>828</sup> In particular, the obligation to ensure respect requires Iranian authorities to have taken reasonable steps to prevent poisoning incidents from occurring. Iranian officials failed to do so, in violation of Iran’s general obligations that are required under the ICCPR and the CRC, and in violation of additional specific articles in the ICCPR, the ICESCR, and the CRC. These specific violations include:

- Iran’s failure to prevent injury or violence to children, in violation of Article 19 of the CRC and Article 24 of the ICCPR;
- Iran’s failure to take reasonable steps to ensure a safe learning environment and prevent violence targeting schools, in violation of Article 28 of the CRC and Article 13 of the ICESCR;
- Iran’s apparent censorship and withholding of health information about the poisonings, in violation of the right to health under Article 12(1) of the ICESCR; and
- Iran’s failure to take reasonable steps to prevent further poisoning incidents at girls’ schools, despite the poisonings continuing for months, in violation of the prohibition on sex-based discrimination under Article 2(2) of the ICCPR and Article 2 of the CRC.

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<sup>827</sup> See, e.g., Azadeh Moavini, *The Protests Inside Iran’s Girls’ Schools*, THE NEW YORKER (Aug. 7, 2023) <https://www.newyorker.com/magazine/2023/08/14/the-protests-inside-irans-girls-schools> (detailing the widespread acts of defiance in girls’ schools across Iran during the “Woman, Life, Freedom” movement, including removing headscarves, scrawling “Woman, Life, Freedom” on desks, removing portraits of Iranian government leadership, and defacing photos of Ayatollah Khomeini).

<sup>828</sup> *Supra* note 714. As discussed in Part A, the ICCPR, the CRC, and even the ICESCR have due diligence-like provisions that similarly require that states take preventive measures. These include the child’s right to be free from violence, which requires that states take “appropriate measures” to prevent violence against children, the right to health, which requires that states refrain from censoring, withholding, or intentionally misrepresenting health-related information, and the right to education, which requires that states ensure a safe learning environment.

This Part details how Iran failed to ensure respect for human rights. Part D then examines whether Iran provided an effective remedy for victims, an additional component of fulfilling due diligence obligations under the ICCPR and the CRC. Taken together, they demonstrate how Iran's conduct constitutes a failure to uphold its due diligence obligations.

### i. Standard Defining “Reasonable” Steps

States must take “reasonable” steps to avert the human rights abuse.<sup>829</sup> While there is no single set of requirements that denote when a state ought to take reasonable steps, one test that is commonly used to assess whether a state met its duty to prevent human rights abuses is the *Osman* Test. While the *Osman* Test is traditionally used in right to life cases, it has been applied in other contexts.<sup>830</sup> This test requires that authorities “knew or ought to have known” about the abuse and “failed to take measures within the scope of their powers” that might have reasonably “been expected to avoid that risk.”<sup>831</sup> Under this test:

- (1) there must be a real and immediate threat to an identified individual or group of individuals;
- (2) the state must have known or reasonably could have known of the threat; and
- (3) the state failed to take reasonable measures within its power to avoid the possible violation.<sup>832</sup>

There are not clear definitions of what count as “reasonable” steps. Some factors to consider include: information availability, nature and immediacy of the threat, operational capabilities and resources, preventive measures taken, and whether those measures worked.<sup>833</sup> States should take into consideration the specific needs of protection for individuals including the specific needs of vulnerable groups, such as children,<sup>834</sup> and of “particular importance,” children in schools, who are under the exclusive control of authorities during this time.<sup>835</sup> Case law from international human rights courts indicates that such measures generally may include protection of threatened

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<sup>829</sup> See *supra* note 714.

<sup>830</sup> See, e.g., *Kontrova v. Slovakia*, App. No. 7510/04, ¶¶ 47-55, Eur. Ct. H.R., Merits and Just Satisfaction (May 31, 2007) (violence against women); *Halime Kilic v. Turkey*, App. No. 63034/11, *supra* note 746 at ¶¶ 62-77 (systematic violence by private actors against political opponents); *O’Keeffe v. Ireland [GC]*, App. No. 35810/09, ¶¶ 144-6, Eur. Ct. H.R., Judgment (Jan. 28, 2014) (torture and ill-treatment); see also Franz Christian Ebert & Romina I. Sijniensky, *Preventing Violations of the Right to Life in the European and the Inter-American Human Rights Systems: From the Osman Test to a Coherent Doctrine on Risk Prevention?* 15 HUMAN RIGHTS L. REV. 343, 348-55 (2015) (detailing court cases from the European and Inter-American Courts of Human Rights that have applied the *Osman* test, including violence against women, systematic violence by private actors, instances where the state contributed to the risk, or instances where the risks are structural).

<sup>831</sup> *Osman v. United Kingdom*, App. No. 23452/94, ¶ 116, Eur. Ct. H.R., Judgment (Oct. 28, 1998).

<sup>832</sup> See *id.*; see also Franz Christian Ebert & Romina I. Sijniensky, *supra* note 830 at 347.

<sup>833</sup> See *Tagayeva and Others v. Russia*, App. No. 26562/07 and 6 other applications, ¶¶ 484-93, Eur. Ct. H.R., Judgment (Apr. 13, 2017); ALICE OLLINO, *DUE DILIGENCE OBLIGATIONS IN INTERNATIONAL LAW* 176 (2022).

<sup>834</sup> *Osman v. United Kingdom*, App. No. 23452/94, *supra* note 831; *O’Keeffe v. Ireland*, App. No. 35810/09, *supra* note 830 at ¶ 144.

<sup>835</sup> *O’Keeffe v. Ireland*, App. No. 35810/09, *supra* note 830 at ¶ 145; see also *Case of Bibi v. Albania*, App. No. 24228/18, ¶ 67, Eur. Ct. H.R., Judgment (Aug. 7, 2024) (reiterating that there is no tolerance for ill-treatment at schools and states have a positive obligation to protect children from any violence or abuse in schools); *Ilbeyi Kemaloğlu and Meriye Kemaloğlu v. Turkey*, App. No. 19986/06, ¶ 35, Eur. Ct. H.R., Judgment (Apr. 10, 2012); *Kayak v. Turkey*, App. No. 4451/02, ¶¶ 56-9, Eur. Ct. H.R., Judgment (Jan. 24, 2007).



potential victim (failure to prevent right to life violation), even where the state did not have precise knowledge of a planned attack;<sup>836</sup> taking action to remove or manage waste or other hazardous materials (failure to prevent violation of right to health or private life);<sup>837</sup> or informing the public of health risks.<sup>838</sup> In the context of schools, courts have observed that measures like surveillance over school entryways and exits,<sup>839</sup> school inspections,<sup>840</sup> or reporting mechanisms for ill-treatment<sup>841</sup> may be some measures officials can take where children's safety and well-being is at stake.

Here, the poisonings presented a real and immediate threat to school children and particularly schoolgirls around Iran, a threat that was well-known to Iranian officials by late February 2023, as outlined in this Report.<sup>842</sup> Indeed, top officials in Iran publicly acknowledged the threat posed by the poisonings<sup>843</sup> and understood that the poisonings were spreading to schools throughout the country, and in particular girls' secondary schools.<sup>844</sup> These circumstances quite clearly satisfied the first two requirements of the *Osman* test. Thus the remaining question is whether Iran took

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<sup>836</sup> Case of Opuz v. Turkey, Application No. 33401/02, ¶¶ 169-70, Eur. Ct. H.R., Judgment (Sept. 9, 2009); Case of Rumor v. Italy, App. No. 72964/10, ¶¶ 64-8, Eur. Ct. H.R., Judgment (Aug. 27, 2014); Case of Volodina v. Russia, App. No. 41261/17, ¶¶ 87-91, Eur. Ct. H.R., Judgment (July 9, 2019); Yarce et. al. v. Columbia, Case Nos. 12.595, 12.596, and 12.621, Inter-Am. Comm'n H.R., ¶¶ 187-9 (Nov. 4, 2013); Case of the Pueblo Bello Massacre v. Colombia, Judgment (Merits, Reparations & Costs), Inter-Am. Ct. H.R., Series C No. 140, ¶¶ 134-40 (Jan. 31, 2006).

<sup>837</sup> Locascia and Others v. Italy, App. No. 35648/10, ¶¶ 126-34, Eur. Ct. H.R., Judgment (Oct. 19, 2023); Case of Kotov and Others v. Russia, App. Nos. 6142/18 and 13 others, ¶¶ 129-34, Eur. Ct. H.R., Judgment (Oct. 11, 2022).

<sup>838</sup> Locascia and Others v. Italy, App. No. 35648/10, *supra* note 837 at ¶¶ 126-34, 140.

<sup>839</sup> Kayak v. Turkey, App. No. 4451/02, *supra* note 835 at ¶ 60.

<sup>840</sup> O'Keeffe v. Ireland, App. No. 35810/09, *supra* note 830 at ¶¶ 164-66.

<sup>841</sup> *Id.* at ¶ 162.

<sup>842</sup> See, e.g., Mass poisoning of students in Khuzestan + video of the latest condition of the patients, TASNIM (Mar. 5, 2023) (Doc. 184\_28) (Tasnim referring to the incidents as "mass poisoning incidents"); Poisonings that are found to be intentional, AKHARIN KHABAR (Feb. 28, 2023) (quoting Prosecutor-General Mohammad Jafar Montazeri, who said that "the poisoning of Qom students is probably intentional and a criminal act"); The causes and perpetrators of student poisoning should be introduced to the public, ISNA (Mar. 1, 2023) (quoting Tehran MP Mohsen Pirhadi, stating that the "repetition of the incidents ... in several other cities ... has refuted any suspicion that it was unintentional"); see also By order of the leadership, the perpetrators of the student poisoning must be identified immediately, ISNA (Mar. 6, 2023) (quoting Deputy Chairman of Parliament's Social Commission Vali Esmaili who said "this is a reality that is happening," explaining that he had recently been to a hospital treating affected students and two teachers and calling on security forces to "seriously investigate" this issue); Head of the Parliament's Legal Commission: The perpetrators and those responsible for the poisoning of students must definitely be dealt with severely, ISNA (Mar. 6, 2023) (quoting head of the Legal and Judicial Commission for Parliament Musa Ghazanfarabadi, who said "it is obvious and clear that this is a crime and the perpetrators and those responsible must be severely punished").

<sup>843</sup> See, e.g., Ayatollah Raisi: The enemy's conspiracy to poison students is a crime against humanity, ISNA (Mar. 5, 2023) (President of Iran calling the poisonings "a crime and an inhumane act"); Revolutionary Leader: The issue of poisoning students is a major and unforgivable crime, ISNA (Mar. 6, 2023) (quoting Ayatollah Khomeini, who called the poisonings "a major and unforgivable crime and ... the perpetrators must be severely punished").

<sup>844</sup> See, e.g., Chemical compounds responsible for poisoning Qomi students, IRIB (Feb. 26, 2023) (reporting that Deputy Minister of Health and Medical Education Younes Panahi stated that "some people wanted all schools, especially girls' schools, to be closed"); Herald: We are following the story of whether the poisoning of the schoolgirls was intentional, ISNA (Feb. 27, 2023) (quoting head of the Parliament's Education and Research Commission Alireza Monadi, who said that "the fact that there was an evil will and thought behind the incident to prevent the children of this land, especially our girls, from receiving an education is a significant risk and is very bad news").

reasonable measures within its power to protect Iranian schoolgirls from future incidents, thereby preventing violations of their human rights.

## ii. Iran Failed to Take Reasonable Steps to Protect Students from the Health Consequences of the Poisoning Incidents

First, Iran failed to take reasonable steps to protect girls from the effects of the poisoning incidents, and failed to provide accurate health information to parents and students about the poisonings.

On the surface, it seems Iran did take some appropriate measures to protect girls' health. In all of our cases, there is evidence that first responders arrived on the scene to treat girls once they left the schools following an incident,<sup>845</sup> and the Ministries of Education and Health were reported to have provided instructions to school administrators to protect students from the poison's effects.<sup>846</sup> Masks were recommended in schools by the Ministry of Health, and in several of our videos girls can be seen wearing masks (although it's impossible to know whether this was related to the poisonings or other public health emergencies, like COVID-19).

However, upon closer inspection, it appears authorities overrode important recommendations, such as evacuating in the event of a poisoning. Local education departments were reported to have told school administrators to keep children inside and prevent as much as possible information from being shared to the media.<sup>847</sup> And in April 2023, ISNA reported that, in response to allegations that girls were prevented from leaving, the Ministry of Education did not appear to have sent "the correct [...] instructions to administrators to deal with these incidents."<sup>848</sup> In interviews with a nonprofit outside of Iran, teachers similarly reported that they were forced to stay inside when an incident occurred.<sup>849</sup> Indeed, in five of our thirteen cases (all of which occurred in April 2023, after the Persian New Year), there were allegations that girls were prevented from leaving the school by administrators, including one from an eyewitness.<sup>850</sup> If government officials did in fact issue a directive to keep girls inside, they risked "irreparable harm" to the girls, as one medical professional told ISNA, especially for those with underlying conditions like asthma.<sup>851</sup>

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<sup>845</sup> See *supra* note 513.

<sup>846</sup> [\*Education Minister: Schools will not be closed\*](#), TASNIM (Mar. 5, 2023) (instructions were reported to include leaving the school immediately, referring affected students to medical centers, ensuring there are no strange objects in classrooms, and making sure students have not put any objects in their bags); see also [\*"Poisoning Incident" From Anxiety and Delusions to Lack of Work / Briefing Sessions for Teachers to Be Held\*](#), ISNA (Mar. 3, 2023) (reporting that school administrators in Qom met with intelligence officials and the Ministry of Education and were instructed on how to handle future poisoning incidents, which included instructions to evacuate).

<sup>847</sup> [\*Strange instructions to school administrators regarding student poisoning/prevent the news from being published in the media and ensure that no one leaves the school\*](#), ARMAN MELI (Mar. 6, 2023).

<sup>848</sup> [\*What was the cause of the student poisoning in Shahinshahr?\*](#) ISNA (Apr. 15, 2023) (Doc. 143\_27).

<sup>849</sup> [\*Iran: School Girls Continue to Face Chemical Attacks, Officials Refuse to Provide Security\*](#), CENTER FOR HUMAN RIGHTS IN IRAN (Apr. 24, 2023).

<sup>850</sup> See *supra* Part II.B(i)(a)(2).

<sup>851</sup> See [\*What was the cause of the student poisoning in Shahinshahr?\*](#) ISNA (Apr. 15, 2023) (Doc. 143\_27) (quoting a medical professional, who explained to ISNA that holding students inside the school could be irreparably harmful to them, especially for those with underlying health conditions); see also [\*Khayyam Pardis School\*](#), PARDIS TV (Mar.

In addition, while officials may have distributed response manuals to school administrators, officials do not appear to have disseminated public health information to students and their parents about how to best respond should a poisoning incident occur. Instead, state officials, along with state-affiliated news outlets, actively withheld or misrepresented information about the poisonings and their effects from the public, including parents and students.<sup>852</sup> ISNA pointed out in an article published in early March that “not much content has been produced about ... safety.”<sup>853</sup> And a member of Parliament’s Health Commission appears to have effectively admitted that information was withheld from the public.<sup>854</sup> While more facts would need to be obtained about what health information was disseminated, where, by whom, and how, it appears that officials failed to do so, violating Iran’s obligations under the ICESCR.<sup>855</sup>

### iii. Iran Failed to Take Reasonable Steps to Prevent Additional Poisoning Incidents

Second, Iran failed to take reasonable steps to prevent future poisoning incidents from occurring. Although Iranian government structures and security apparatuses are shrouded in secrecy, there is little question that within the government there are powerful security apparatuses that could have enabled Iran to institute at least some additional security measures in and around schools, such as posting additional security guards at entryways or around schools.<sup>856</sup> Eventually, with rising attention on the issue and the lack of security measures being taken,<sup>857</sup> FARAJA, the national police force, announced on March 6, 2023 that it had created more than four thousand patrols who were surveilling schools daily.<sup>858</sup> In addition to FARAJA, Deputy Minister of Interior Majid Mirahmadi announced on March 7 that the Basij was ready to provide assistance “to the extent required by [school] administrators,” including controlling schools’ exits and

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1, 2023) <https://www.aparat.com/v/gpu8B> (Doc. 357\_13) (interviewing an affected girl from Khayyam school in Pardis, who said she has asthma and was one of the first in her class to start feeling nauseous from the gas).

<sup>852</sup> See *infra* Part III.D(iii)(b) (describing state obfuscation and withholding of information about the poisoning incidents and investigations); see also *supra* Part II.A (detailing state- and IRGC-affiliated news outlets’ reporting about the poisonings, which tended to doubt whether incidents occurred, downplay girls’ symptoms, contradict prior information, and starting in April, largely stopped reporting on them at all).

<sup>853</sup> *"The Poisoning Incident" and the Media That Arrives Late/Why Don't We Consider the Media a Friend?* ISNA (Mar. 4, 2023).

<sup>854</sup> *26 provinces and 245 schools were involved in the poisoning/security forces were unable to find any foreign agents/they covered up the issue*, ROUYDAD24 (Mar. 17, 2023) (quoting the official as saying that “cooperation [with investigations] did not happen here, because we were not honest with the people and hid the matter”).

<sup>855</sup> It’s plausible Iran’s withholding and misrepresentation of health information also violated its obligations under other human rights treaties, like the ICCPR or the CRC. See, e.g., *Locascia and Others v. Italy*, App. No. 35648/10, *supra* note 837 at ¶¶ 126-134, 140 (finding that Italy violated its human rights obligations for failing to, among other measures, inform the public about the public health risks from waste).

<sup>856</sup> This was considered a “reasonable” measure to prevent school attacks in armed conflict settings, for example. See Zama Coursen-Neff & Bede Sheppard, *supra* note 743.

<sup>857</sup> See, e.g., *The causes and perpetrators of student poisoning should be introduced to the public*, ISNA (Mar. 1, 2023) (quoting MP for Tehran accusing security officials for failing to follow up and handle the security issues at schools).

<sup>858</sup> *Establishing special and specialized fixed and mobile patrols around schools*, TASNIM (Mar. 6, 2023) (announcing the establishment of foot patrols around schools); *110 people arrested in connection with the "poisoning of students" case/ Stink bombs behind the events*, ISNA (Mar. 15, 2023) (declaring that more than four thousand patrols had been created which were surveilling schools daily).

entries.<sup>859</sup> If these were actually carried out, this would have gone a long way to meet the “reasonable” measures standard.

However, it does not appear such enhanced security measures were ever actually carried out. Teachers and students interviewed by the Center for Human Rights in Iran said that their schools had not, in fact, been provided with security monitoring.<sup>860</sup> Instead, it appears that schools were simply left on their own to ensure their security. In Qom, school administrators reported that meetings with the Qom Education Department, the passive defense organization, and emergency response personnel, they were simply told what safety actions they should take if another poisoning incident occurs.<sup>861</sup> In Tehran, schools reported taking matters into their own hands, closing windows, banning food deliveries, and prohibiting parents from entering.<sup>862</sup> Other instructions supposedly sent to school administrators similarly placed administrators in charge, instructing them to control school entry and exit points themselves.<sup>863</sup> A member of Parliament’s Fact-Finding Working Group similarly instructed parents, students, teachers, and school administrators to prevent unauthorized people from entering their schools.<sup>864</sup> And local officials instructed schools to ensure their video monitoring equipment was set up around their schools,<sup>865</sup> as did a manual allegedly distributed to school administrators.<sup>866</sup> Calls for “human chains” to be formed around schools in late April by the Coordinating Council of Teachers’ Unions, along with photos published on social media that appear to depict mothers sitting outside of a school in Zanjan, further cast doubt on whether security officials ever took action to increase the presence of security personnel to protect schools around the country.<sup>867</sup> Even the Ministry of Intelligence, when asserting it had dispatched security patrols that conducted surveillance and gathered information in unspecified “target environments,”<sup>868</sup> did not mention these security patrols were being used to protect schools. Moreover, tellingly, in not one of our thirteen cases did we find official statements, reporting, or other open-source evidence that officials took additional

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<sup>859</sup> [\*Latest details on the investigation into student poisoning\*](#), ISNA (Mar. 7, 2023).

<sup>860</sup> [\*Iran: School Girls Continue to Face Chemical Attacks, Officials Refuse to Provide Security\*](#), CENTER FOR HUMAN RIGHTS IN IRAN (Apr. 24, 2023).

<sup>861</sup> [\*“Poisoning Incident” From Anxiety and Delusions to Lack of Work / Briefing Sessions for Teachers to Be Held\*](#), ISNA (Mar. 3, 2023).

<sup>862</sup> [\*The mystery of the unknown gas\*](#), HAM-MIHAN (Mar. 4, 2023). Note that the article reports that for those same schools, police officers were “being assigned” to guard them. *Id.* It is unclear whether this was at the schools’ request or whether this was part of a city-wide mandate, although it came before FARAJA’s announcement so it was clearly separate from the national claims.

<sup>863</sup> [\*Hotline 1570 is ready to provide telephone counseling to families in recent school incidents\*](#), TASNIM (Mar. 13, 2023).

<sup>864</sup> [\*Rezazadeh: The main causes of student poisoning will be introduced in the next few days/School principals should be vigilant\*](#), ISNA (Mar. 7, 2023).

<sup>865</sup> [\*Students’ families should remain calm and avoid paying attention to rumors\*](#), IRNA (Mar. 5, 2023) (reporting that Mohammad Rahimi, Director General of Passive Defense at the Ilam Governorate’s Office, instructed schools and universities in Ilam to make sure their facilities were equipped with CCTV cameras).

<sup>866</sup> [\*Hotline 1570 is ready to provide telephone counseling to families in recent school incidents\*](#), TASNIM (Mar. 13, 2023).

<sup>867</sup> *Chain poisoning continues in Karaj, Hamedan, and Sanandaj; students and two teachers transferred to hospital and proposal to form a “Student Protection Committee,”* BBC PERSIAN (Apr. 24, 2023) <https://www.bbc.com/persian/articles/clelg3dny66o>; see also [\*Cyberspace users’ suggestion: If necessary, we will form a human chain around schools\*](#), ETEMAD DAILY (Mar. 2, 2023) (reporting that after several poisoning incidents were reported, Twitter users called for the creation of human chains to protect girls’ schools).

<sup>868</sup> [\*Ministry of Intelligence’s explanatory statement regarding school incidents in the country\*](#), ISNA (Apr. 28, 2023).



security measures to protect schools after reported incidents, such as (but not limited to) stationing security officers to prevent unauthorized visits.<sup>869</sup> Instead, evidence from one case on April 11 suggests that police were not actually stationed at schools at all.<sup>870</sup>

In addition, school closures were limited, if implemented at all. Short school closures could have been a reasonable measure for Iranian officials to take following incidents, to permit detailed investigations of schools where poisoning incidents occurred and to protect girls from potential repeat incidents. Yet looking at our cases, only two schools were temporarily closed for just the remainder of the day following an incident; one was closed for a day and a half. This is despite the fact that several of our cases involved schools that had sustained prior incidents,<sup>871</sup> as well as two schools in provinces in which, the day before, a number of incidents were reported.<sup>872</sup> Indeed, officials appeared determined to not close schools due to the poisonings. The Minister of Education announced nationally that no schools would be closed due to reported poisoning incidents,<sup>873</sup> and several regions reportedly instituted mandatory attendance<sup>874</sup> and prohibited staff from taking a leave of absence.<sup>875</sup> While all of this could possibly be explained by officials prioritizing the importance of girls' education and not allowing the poisoning incidents to close girls' schools, it is surprising that so many schools were not closed at all even following repeat

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<sup>869</sup> Nor can this absence be explained by a lack of security official presence; based on open-source information, we know that in at least seven of our cases, security personnel or police were present after incidents occurred.

<sup>870</sup> See @1500tasvir, TELEGRAM (Apr. 11, 2023) <https://t.me/t1500tasvir/6932> (Doc. 145\_03), @ Melim43029819, X (Apr. 11, 2023) <https://x.com/Melim43029819/status/1645720348355076097?s=20> (Doc. 145\_10) (a woman can be heard screaming in a video in front of Shayan Girls' High School in Isfahan City on April 11, 2023, "how many times did I say to close the doors to this school?" suggesting that security measures were not taken to protect girls at Shayan high school); see also @mizangorup, TELEGRAM (Apr. 11, 2023) <https://t.me/mizangorup/44010> (Doc. 145\_08) (in an unverified alleged interview with a student, Mizan's Telegram Channel reported that the affected student said that police showed up after the incident occurred and began patrolling the area, strongly suggesting they were not there prior).

<sup>871</sup> These include the incident at Noor Vocational School on December 13, 2022 in Qom, where an incident had occurred 2 weeks prior, *18 students were poisoned in Qom; all of them are in good condition*, ISNA (Nov. 30, 2022) (Doc. 287\_13); and the incident at Sema Girls' High School in Ardebil on April 8, 2023, where girls experienced another incident at the same school five weeks prior, *Serial poisoning of schoolgirls reaches Ardabil / 108 students transferred to hospital*, IRNA (Mar. 1, 2023) (Doc. 40\_26) (confirming that girls at Sema girls' school had been "poisoned" on March 1, 2023).

<sup>872</sup> A number of schools across Khuzestan province were reported to have experienced poisoning incidents on March 4, a day before the March 5 incident at Hazarat Zeyneb Girls' High School in Ramhormoz, Khuzestan Province, *Poisoning of 115 female students in Ramhormoz*, ISNA (Mar. 5, 2023) (Doc. 184\_10) (reporting that 312 students across Khuzestan were "poisoned" on March 4); *Schools in Khuzestan are not closed on Monday*, IRNA (Mar. 5, 2023) (Doc. 184\_27) (reporting that 700 students as of March 4 had been poisoned across Khuzestan). Despite this, Khuzestan officials announced that schools would remain open on March 5. *Id.* (quoting Dr. Habib Haibar, a spokesperson for the Ahvaz Jundishapur University of Medical Sciences, who said that "no instructions had been announced so far for the closure of schools."). In addition, incidents were reported in Borujerd, Lorestan Province including one of our cases at Ahmadiyyah Girls' High School, yet officials failed to close schools elsewhere in the province, including 15 Khordad Girls' High School, which experienced a poisoning incident the following day.

<sup>873</sup> *Education Minister: Schools will not be closed*, TASNIM (Mar. 5, 2023).

<sup>874</sup> See, e.g., *In-person activities in Hamadan schools/ Attending school is not optional*, ISNA (Mar. 12, 2023) (reporting that the Director General of Education in Hamedan said that school attendance is not optional and schools are remaining open).

<sup>875</sup> *Hotline 1570 is ready to provide telephone counseling to families in recent school incidents*, TASNIM (Mar. 13, 2023) (instructing schools to prohibit school staff from taking leaves of absence).



incidents. Instead, it once again suggests that officials did not appear to be taking reasonable steps to protect students.

In sum, Iran failed to take reasonable measures to prevent human rights violations by non-state actors. Specifically, Iran's failure to protect students from the health effects of the toxic agent, and its failure to institute reasonable additional security measures in and around schools, constitute likely violations of its due diligence obligations under the ICCPR and the CRC, and violations of specific articles under the ICCPR, the ICESCR, and the CRC.

#### **D. Iran Failed to Meet its Human Rights Due Diligence Obligations Even if the Poisonings Are Not Attributable to the Government: Iran Did Not Provide an Effective Remedy for Victims**

As part of its obligation to ensure the fulfillment of human rights, Iran is also required to provide an effective remedy for victims of human rights violations. This involves conducting a proper investigation when human rights violations occur and, where appropriate, prosecuting perpetrators and providing appropriate reparations and/or other remedies to victims. Here, Iran conducted a biased and incomplete investigation, and this improper investigation produced faulty results. In doing so, Iran failed to provide an effective remedy for victims of the poisoning incidents, in violation of its due diligence obligations under the ICCPR and the CRC. Given that the vast majority of incidents occurred in girls' schools, Iran's failure to provide an effective remedy to victims also likely constitutes a violation of the prohibition on discrimination on the basis of sex under Article 2(2) of the ICCPR and Article 2 of the CRC.

In addition, although Iranian authorities asserted that they had arrested individuals responsible for the poisonings, the absence of any transparent information about who was arrested, of what poisoning incidents they were accused, or whether there were any subsequent prosecutions or convictions of alleged perpetrators, gives rise to profound doubts about whether Iran took engaged in any good faith efforts to prosecute perpetrators of the poisoning incidents. Because the open-source data on which our report relies does not enable us to investigate the performance of the government in carrying out arrests and prosecutions, we are not able to further analyze whether Iran fulfilled its obligation to carry out bona fide prosecutions of persons responsible for the poisoning incidents, but we remain doubtful that arrests and prosecutions in a court of law under due process of perpetrators ever occurred.

### i. Standard Defining a Proper Investigation

Where certain human rights violations occur, states have an obligation to investigate.<sup>876</sup> This obligation extends to the rights protected in the ICCPR and the CRC.<sup>877</sup> There is no uniform standard for a proper investigation, but generally, investigations should be “prompt[], thorough[], and effective[]” and conducted “through independent and impartial bodies.”<sup>878</sup> This means that an investigation:

- should be carried out by an independent authority that is not involved in the alleged violations;<sup>879</sup>
- should be impartial, lacking pre-conceived ideas or prejudice by those carrying out the investigation;<sup>880</sup>
- should be prompt, ensuring that critical evidence does not disappear before investigations commence;<sup>881</sup>
- should be thorough, including gathering and documenting all evidence,<sup>882</sup> and subjecting such documentation to public scrutiny (while respecting the right to privacy);<sup>883</sup> and

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<sup>876</sup> See *The Right to a Remedy and Reparation for Gross Human Rights Violations: A Practitioner's Guide*, INT'L COMM. JURISTS 88 (2018) (“it is clear ... that ... there is a right to a prompt, effective, impartial and independent investigation for all human rights violations”); Basic Principles and Guidelines on the Right to a Remedy and Reparation for Victims of Gross Violations of International Human Rights Law and Serious Violations of International Humanitarian Law, G.A. Res. 60/147 Annex 1 para. 4 (Dec. 16, 2005) (outlining right to remedy and reparation, which includes a duty to investigate, for gross human rights violations); see also Velásquez Rodríguez v. Honduras, *supra* note 716 at ¶ 174 (“The State has a legal duty to ... use the means at its disposal to carry out a serious investigation of violations committed within its jurisdiction”); Declaration of Human Rights Defenders, Art. 9(5), A/Res/53/144 (1998) (requiring that the State conduct a “prompt and impartial” investigation whenever there is “reasonable ground to believe that a violation of human rights ... has occurred in ... its jurisdiction”).

<sup>877</sup> ICCPR, art. 2; Human Rights Committee, *General Comment No. 31*, *supra* note 713 at ¶ 15 (explaining that states have an obligation to investigate violations of the ICCPR “promptly, thoroughly, and effectively”); CRC, art. 19(2) (calling on state signatories to “investigate, treat, and follow-up on instances of child maltreatment” including “all forms of physical or mental violence” committed against children while under the care of another); Committee on the Rights of the Child, *General Comment No. 13*, *supra* note 714 at ¶ 51 (interpreting art. 19, para. 2 to require states to investigate instances of violence by pursuing “rigorous but child-sensitive procedures” to correctly identify and “help provide evidence administrative, civil, child-protection, and criminal” proceedings).

<sup>878</sup> ICCPR, art. 2; Human Rights Committee, *General Comment No. 31*, *supra* note 713 at ¶ 15.

<sup>879</sup> McKerr v. the United Kingdom, App. No. 28883/95, ¶ 112, Eur. Ct. H.R., Judgment (May 4, 2001); Finucane v. the United Kingdom, App. No. 29178/95, ¶ 68, Eur. Ct. H.R., Judgment (July 1, 2003); see also *The Right to a Remedy and Reparation for Gross Human Rights Violations*, *supra* note 876 at 99.

<sup>880</sup> *The Right to a Remedy and Reparation for Gross Human Rights Violations*, *supra* note 876 at 101.

<sup>881</sup> See *id.*; see also Myrna Mack-Chang v. Guatemala, Judgment (Merits, Reparations & Costs), Inter-Am. Ct. H.R., Series C No. 101, ¶ 193 (Nov. 25, 2003).

<sup>882</sup> *The Right to a Remedy and Reparation for Gross Human Rights Violations*, *supra* note 876 at 111; see also Myrna Mack-Chang v. Guatemala, Series C No. 101, *supra* note 881 at ¶ 167; Finucane v. the United Kingdom, App. No. 29178/95, *supra* note 879 at ¶ 69 (“authorities ... must have taken the reasonable steps available to them to secure the evidence concerning the incident, including ... eyewitness testimony, forensic evidence ...”).

<sup>883</sup> *The Right to a Remedy and Reparation for Gross Human Rights Violations*, *supra* note 876 at 115; see also Amnesty Int'l et al. v. Sudan, Afr. Comm'n H.P.R., Commc'ns 48/90, 50/91, 52/91 & 89/93, ¶ 51 (2000); Juan Humberto Sánchez v. Honduras, Judgment (Preliminary Objections, Merits & Reparations), Inter-Am. Ct. H.R., Series C No. 99, ¶ 186 (June 7, 2003); McKerr v. the United Kingdom, App. No. 28883/95, *supra* note 879 at ¶ 141; Case of Chitayev v. Russia, App. No. 59334/00, ¶ 163, Eur. Ct. H.R., Judgment (Jan. 18, 2007).

- should be *effective*, capable of leading to a finding about the alleged rights violation and, where relevant, the identification of the perpetrators, even if complainants disagree with the result.<sup>884</sup>

Case law from regional international human rights courts indicates that an improper investigation may involve a failure to: provide a prompt medical examination;<sup>885</sup> take relevant samples;<sup>886</sup> question relevant witnesses or officials;<sup>887</sup> inspect areas where incidents occurred;<sup>888</sup> include an objective analysis of clinical findings;<sup>889</sup> or provide complainants access to the investigation's materials.<sup>890</sup> Importantly, assessing proper investigations is a process-based assessment rather than an examination of investigatory results.<sup>891</sup> This means that the process should be capable of leading to a finding about the alleged rights violation and possible perpetrators, but does not have to result in a finding in favor of the reported victims.

Carrying out a proper investigation is a component of providing an effective remedy for victims, and failure to do so can breach this right.<sup>892</sup> That's because an effective remedy must be capable of figuring out whether a violation took place and, if so, what measures would remedy the violation.<sup>893</sup> Iran's investigations were neither impartial nor thorough.<sup>894</sup> These faulty investigations were not capable of providing a determination about possible rights violations, which is borne out by the limited results of the investigations. In addition, Iran appears to have failed to identify or prosecute the perpetrators of the poisoning incidents. Iran accordingly failed to provide the victims of the poisoning attacks with an effective remedy, in violation of its human rights obligations.

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<sup>884</sup> See *The Right to a Remedy and Reparation for Gross Human Rights Violations*, *supra* note 876 at 102; *Finucane v. the United Kingdom*, App. No. 29178/95, *supra* note 879 at ¶ 69; see also *McCann and Others v. the United Kingdom*, Series A No. 324, ¶ 161, Eur. Ct. H.R., Judgment (Sept. 27, 1995); *Kaya v. Turkey*, App. No. 22729/93, ¶ 86, Eur. Ct. H.R., Judgment (Feb. 19, 1998); *Case of Chitayev and Chitayev v. Russia*, App. No. 59334/00, ¶ 163, Eur. Ct. H.R., Judgment (Jan. 18, 2007).

<sup>885</sup> *Mammadov (Jalaloglu) v. Azerbaijan*, App. No. 34445/04, Eur. Ct. H.R., Judgment Summary (Nov. 1, 2007); *Case of Chitayev*, App. No. 59334/00, *supra* note 884 at ¶ 165.

<sup>886</sup> *Myrna Mack-Chang v. Guatemala*, I/ACtHR, Judgment of 25 November 2003, Series C No. 101, para. 166; *Case of Kaya v. Turkey*, Application No. 22729/93, Judgment, 19 February 1998, para. 89; *Finucane v the United Kingdom*, ECtHR, Judgment of 1 July 2003, para 69.

<sup>887</sup> *Mammadov (Jalaloglu) v. Azerbaijan*, App. No. 34445/04, *supra* note 885; *Kaya v. Turkey*, App. No. 22729/93, *supra* note 884 at ¶ 89; *Finucane v. the United Kingdom*, App. No. 29178/95, *supra* note 879 at ¶ 69.

<sup>888</sup> *Case of Chitayev*, App. No. 59334/00, *supra* note 884 at ¶ 165; *Case of Kaya v. Turkey*, Application No. 22729/93, Judgment, 19 February 1998, para. 89.

<sup>889</sup> *Finucane v the United Kingdom*, ECtHR, Judgment of 1 July 2003, para 69; *Kaya v. Turkey*, App. No. 22729/93, *supra* note 884 at ¶ 89.

<sup>890</sup> *Case of Chitayev*, App. No. 59334/00, *supra* note 884 at ¶ 165.

<sup>891</sup> See *Finucane v. the United Kingdom*, App. No. 29178/95, *supra* note 879 at ¶ 69.

<sup>892</sup> Human Rights Committee, *General Comment No. 31*, *supra* note 713 at ¶ 15; see also *Aksoy v. Turkey*, App. No. 21987/93, ¶¶ 95–100, Eur. Ct. H.R. (Dec. 18, 1996); *The Right to a Remedy and Reparation for Gross Human Rights Violations*, *supra* note 876 at 95.

<sup>893</sup> *The Right to a Remedy and Reparation for Gross Human Rights Violations*, *supra* note 876 at 68; see also *Caracazo v. Venezuela*, Judgment (Reparations & Costs), Inter-Am. Ct. H.R., Series C No. 95, ¶ 115 (Aug. 29, 2002).

<sup>894</sup> We do not assess independence of the investigations, given the uncertainty around who was responsible for the poisoning incidents, although we note with concern the investigations' failure to consider all possible perpetrators, including government-related actors. We also do not assess promptness given that, while initially slow, Iran did eventually investigate while the incidents were still occurring.

## ii. Iran Failed to Conduct Impartial Investigations

First, Iran's investigations into the poisoning incidents were not impartial. Instead, officials appeared to have redirected investigations to fit two predetermined explanations and then characterized those explanations, with little supporting evidence, as the conclusions of the investigations. These predetermined explanations were that the vast majority of incidents were largely caused by student anxiety, and in a small number of cases, the students were actually poisoned, but they were likely poisoned by other students. Ultimately, this partiality tainted the investigations and prevented them from genuinely seeking to uncover how the poisonings occurred, identifying possible perpetrators, and providing for accountability for the poisonings, thus violating Iran's obligation to provide an effective remedy.

### 1. Student Anxiety: A Conclusion Before an Investigation Even Began

Iranian officials first referenced anxiety as explaining the poisonings just days after the first poisoning incident in Qom. With no evident medical or scientific basis, Qom officials declared that girls' continuing leg numbness and paralysis was simply due to "stress."<sup>895</sup> As detailed above in Part B, this explanation was eventually repeated by other officials, countering earlier statements that referred to the incidents as "intentional" poisonings, and contradicting prior investigatory findings by the Ministries of Health and Parliament, as well as the investigation in Qom, which found that the incidents were "mild poisonings" attributed to "gaseous toxins"<sup>896</sup> and affirmations that there was "no doubt that poisoning occurred."<sup>897</sup> Instead, following a statement by Minister of Interior Ahmad Vahidi who declared that "more than 90%" of incidents were attributable to mass hysteria,<sup>898</sup> Iranian ministries and officials began repeating the same explanation.<sup>899</sup> They offered no evidence for why the sudden change in explanation occurred, apart from referring to a set of undefined "studies."<sup>900</sup> Some officials' shifts in explanations were so abrupt, domestic news outlets assumed they had been pressured to do so.<sup>901</sup> State-affiliated

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<sup>895</sup> [\*The latest situation of the poisoned students of Qom/The Provincial Department of Education is following up on the matter\*](#), ISNA (Dec. 3, 2022).

<sup>896</sup> [\*Continuing series on student poisoning/this time in Tehran\*](#), ISNA (Feb. 28, 2023) (reporting Qom investigation initial findings as that the poisoned students "suffered from mild poisoning" from "gaseous toxins"); [\*Sheikhi: The exact cause of the poisoning of Qomi students has not yet been determined\*](#), TASNIM (Feb. 28, 2023) (Same); [\*Continuing series on student poisoning/this time in Tehran\*](#), ISNA (Feb. 28, 2023) (reporting the Ministry of Health's findings, as "a very mild poison caused mild poisoning in the students"). Note that Tasnim reported the Minister of Health's initial findings very differently, claiming that the Minister of Health attributed most of the incidents to students' fear. See [\*Poisoning of students in schools/Family concerns and strange silence from responsible agencies\*](#), TASNIM (Feb. 28, 2023).

<sup>897</sup> [\*Continuing series on student poisoning/this time in Tehran\*](#), ISNA (Feb. 28, 2023); [\*Sheikhi: The exact cause of the poisoning of Qomi students has not yet been determined\*](#), TASNIM (Feb. 28, 2023).

<sup>898</sup> [\*Vahidi: No one has been arrested in connection with the poisoning of students/Security forces are busy searching for clues\*](#), TASNIM (Mar. 1, 2023).

<sup>899</sup> See Section V.B(ii)(3) (detailing the sudden shifts in explanations including from the Ministry of Health, Parliament, and FARAJA).

<sup>900</sup> [\*The substance that caused the students' poisoning was not dangerous\*](#), IRNA (Mar. 6, 2023).

<sup>901</sup> [\*Political poisoning!\*](#), TABNAK NEWS (Mar. 2, 2023) (reporting that Panahi was clearly forced to retract his statement, demonstrating officials' "lack of transparency and concealment" around the poisoning investigations); [\*The Story of Serial Poisonings, Roots and Possibilities\*](#), IRNA (Mar. 1, 2023) (reporting that "public opinion assessed [Panahi's] second statement as being under pressure and did not take it seriously").

news outlets similarly demonstrated an abrupt shift in how they reported on the issues. As detailed above in Part B and in greater detail in Section II of this report, state-affiliated news outlets moved from demanding “accurate reports and convincing answers” and calling the acts “intentional,” to describing the acts as being caused by “mass hysteria” and anxiety and accusing other media outlets of inappropriately stirring up panic.

Although not all news outlets or officials agreed with this explanation at the time, including a member of the Parliamentary Working Group on the issue,<sup>902</sup> mass hysteria was presented as the final result of the investigations pursued by the Ministries of Intelligence and Health.<sup>903</sup> No supporting toxicology analyses were ever provided to support this assertion, and other details – including contrary earlier assessments about what was causing the girls’ symptoms – appear to have simply been ignored, casting doubt on the validity of this assertion. Instead, we suspect that this conclusion was promulgated without being informed by all relevant evidence, and indeed was contradicted by evidence that poison gases were the cause of the symptoms experienced by Iranian school girls. The abruptness with which officials relied on this explanation, along with the fact that the explanation was originally used by Qom officials to explain away lasting symptoms that girls were experiencing, suggests further that Iranian officials may have been working behind the scenes to intentionally shift the narrative about the poisonings, all while lacking the supporting evidence.

## 2. *Student Mischief: A Conclusion Lacking Reliable Evidence*

Of the small fraction of students who were, according to official accounts, actually poisoned, authorities attributed most of these cases to other students simply trying to get out of class. This explanation, like mass hysteria, was announced in conclusory findings by the Ministries of Health<sup>904</sup> and Intelligence.<sup>905</sup> Unlike the mass hysteria allegation, Iranian authorities pointed to at least some evidence in support of this allegation: the alleged arrest of more than 100 perpetrators, some of whom were students, on March 11, 2023.<sup>906</sup> Yet poisoning incidents continued to be reported well after this round-up of alleged perpetrators was announced.<sup>907</sup> This suggests that

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<sup>902</sup> 26 provinces and 245 schools were involved in the poisoning/security forces were unable to find any foreign agents/they covered up the issue, ROUYDAD24 (Mar. 17, 2023) (quoting a member of the Working Group who self-identified as a doctor as saying that “a series of chemicals have been discovered,” and that “hysterics are not the main cause of the poisonings”); see also The mystery of the unknown gas, HAM MIHAN (Mar. 4, 2023) (quoting an ICU specialist, who told the news outlet that it appeared to him that the girls were being poisoned by a “combination of gases” that were not easily accessible to the public); “Poisoning Incident” From Anxiety and Delusions to Lack of Work / Briefing Sessions for Teachers to Be Held, ISNA (Mar. 3, 2023) (reporting after visiting affected girls in a hospital in Qom that “it’s clear not all symptoms are anxiety-induced”).

<sup>903</sup> New report from the Minister of Health on student poisoning/Anxiety and mischief are the cause of more than 90 percent of ill health, ISNA (Apr. 14, 2023); Ministry of Intelligence’s explanatory statement regarding school incidents in the country, ISNA (Apr. 28, 2023).

<sup>904</sup> New report from the Minister of Health on student poisoning/Anxiety and mischief are the cause of more than 90 percent of ill health, ISNA (Apr. 14, 2023) (reporting that in a small percentage of cases, the Ministry of Health found that some students “became ill as a result of student mischief”).

<sup>905</sup> See Ministry of Intelligence’s explanatory statement regarding school incidents in the country, ISNA (Apr. 28, 2023).

<sup>906</sup> The number of school incidents has decreased/students should not be absent, ISNA (Mar. 11, 2023).

<sup>907</sup> See *supra* note 511; see also Asferi: The main culprits behind the students’ poisoning have not yet been arrested, ISNA (Mar. 14, 2023) (quoting a member of the Parliamentary Commission who pointed out that the poisonings continued after the March 11 roundup).



contrary to the Ministry of Interior's assertions, the people arrested were not actually the perpetrators of these incidents, thus undermining the evidentiary support for an effort to attribute the poisonings to student mischief. Other Iranian officials months later confirmed as much.<sup>908</sup>

Further casting doubt on the theory that students seeking to avoid classes were responsible for the poisonings, an MP who was a member of the Parliamentary Fact-Finding Working Group gave a searing interview with ISNA in mid-April. In the interview, he accused security agencies of not making enough of an effort to investigate the poisonings because they thought it was simply due to student mischief, an explanation that was "not acceptable to the Working Group."<sup>909</sup> While it is not entirely clear why this explanation was not acceptable to the Working Group, what is clear is that even for other officials inside of Iran, this explanation lacked evidentiary support.

In sum, both mass hysteria and student mischief as explanations for the widespread poisonings lacked solid evidentiary support and appear to have been advanced publicly without regard to persuasive evidence undermining those explanations, demonstrating that the investigations Iran pursued were biased and not aimed at genuinely seeking to provide the victims of the poisonings with an effective remedy.

### iii. Iran Failed to Conduct Thorough Investigations

In addition to being biased, Iran's investigations appear to have lacked appropriate levels of thoroughness. One would expect, at minimum, investigations into alleged intentional poisonings to involve the gathering of a representative set of relevant samples, including environmental samples at affected schools right after reported incidents and samples from affected students and school staff; analysis of samples by independent toxicology experts that were published for third-party validation; review of CCTV footage to see if any suspicious persons were spotted near the school at relevant times; and detailed interviews with students and staff about what happened, along with bystanders or neighbors who may have seen something.<sup>910</sup> While national officials claimed to have taken many of these steps, evidence from our cases suggests otherwise. Although our cases are not necessarily representative, they do indicate failures to properly

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<sup>908</sup> [\*Traces of a deviant trend in the student poisoning incident/We have no sympathy for this dirty trend/A large number of these people are under surveillance and interrogation\*](#), IRAN LABOR NEWS AGENCY (June 27, 2023) (reporting that MP Morteza Mahmoudvand from Korramabad said that hundreds of other people had been arrested in connection for the poisonings, and that the poisonings were not students' fault).

<sup>909</sup> [\*Latest news from the investigation of "Serial Poisoning in Schools" by the Ministry of Health's Scientific Committee\*](#), ISNA (Apr. 10, 2023). Perhaps tellingly, Tasnim reported Asaferi's statements very differently, omitting Asaferi's statements about the security agencies and blaming the lack of information on the committee itself. [\*The latest details of the fact-finding working group on the plight of students; when will the final report be announced?\*](#) TASNIM (Apr. 10, 2023).

<sup>910</sup> See generally Michele Catanzaro, *Suspected Iran Schoolgirl Poisonings: What Scientists Know*, NATURE (Mar. 13, 2023) <https://www.nature.com/articles/d41586-023-00754-2> (detailing toxicologist Alastair Hay's view that a "comprehensive toxicological screen" with a "representative number of cases" is needed); U.N. Office of the High Commissioner for Human Rights (OHCHR), *Istanbul Protocol: Manual on the Effective Investigation and Documentation of Torture and Other Cruel, Inhuman or Degrading Treatment or Punishment* (hereinafter *Istanbul Protocol*), HR/P/PT/8/Rev.2 ¶ 94 (2022) (listing a physical or medical examination as a critical component for investigating allegations of torture or CIDT) [https://www.ohchr.org/sites/default/files/documents/publications/2022-06-29/Istanbul-Protocol\\_Rev2\\_EN.pdf](https://www.ohchr.org/sites/default/files/documents/publications/2022-06-29/Istanbul-Protocol_Rev2_EN.pdf).

investigate at the individual case level. We see no evidence that the shortcomings of the investigations into the cases we have analyzed were not repeated in other investigations into the incidents.

In addition to an apparent lack of thoroughness, there was a troubling lack of transparency coupled with evident efforts to prevent information from reaching the public about the poisonings.<sup>911</sup> Not only does this make it difficult to verify the findings of the investigations carried out by Iranian authorities, but it suggests that the investigations were not focused on genuine fact-gathering but were instead preoccupied with limiting the spread of information about the poisoning incidents. Indeed, transparency with the underlying evidence supporting an investigation's findings is an internationally-recognized factor for adequate human rights investigations.<sup>912</sup>

### *1. Evidence from Our Cases Suggests Incomplete Evidence Gathering*

First, evidence from our cases casts doubt on the completeness of evidence gathering conducted as part of official Iranian investigations. Officials participating in national investigations claimed an array of samples were gathered from affected schools, including affected students' blood, exhaled breath, and digestive samples; environmental samples (presumably at affected schools);<sup>913</sup> and samples of the toxic agent.<sup>914</sup> Officials asserted that these samples were subjected to "various tests"<sup>915</sup> at "the country's most advanced laboratories,"<sup>916</sup> and that relevant scientists including experts in toxicology analyzed the samples.<sup>917</sup> For the Ministry of Intelligence, this included IRGC laboratories.<sup>918</sup> Yet in our cases, for the nine in which investigations were announced, only five were reported to have gathered samples at all, and there was often limited clarity about what the samples were of or where or how they were analyzed.<sup>919</sup> No analyses of these samples were ever released for public review. In two of our cases, hospital officials reported that they did not even gather samples or conduct tests at all, nor were they aware of instructions to do so.<sup>920</sup> Instead, parents were told it was their own responsibility if they

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<sup>911</sup> See generally *Istanbul Protocol*, *supra* note 910 at ¶ 193 (providing best practices for investigations into torture or CIDT, including that the investigations should be transparent, victims should have access to the findings and authorities should systematically collect and regularly publish disaggregated data).

<sup>912</sup> See *supra* note 883.

<sup>913</sup> Scientific figures and equipment from the country were mobilized to discover the cause of the Qom school incident, IRNA (Feb. 16, 2023) (Qom investigation).

<sup>914</sup> The substance that caused the students' poisoning was not dangerous, IRNA (Mar. 6, 2023) (Ministry of Health investigation).

<sup>915</sup> Scientific figures and equipment from the country were mobilized to discover the cause of the Qom school incident, IRNA (Feb. 16, 2023) (Qom investigation); The substance that caused the students' poisoning was not dangerous, IRNA (Mar. 6, 2023) (Ministry of Health investigation).

<sup>916</sup> Latest details on the investigation into student poisoning, ISNA (Mar. 7, 2023).

<sup>917</sup> Ministry of Intelligence's explanatory statement regarding school incidents in the country, ISNA (Apr. 28, 2023).

<sup>918</sup> The substance that caused the students' poisoning was not dangerous, IRNA (Mar. 6, 2023) (Ministry of Health investigation); Ministry of Intelligence's explanatory statement regarding school incidents in the country, ISNA (Apr. 28, 2023).

<sup>919</sup> See *supra* Part II.B(i)(b).

<sup>920</sup> Families are worried, officials remain silent / Hospitals are not testing the poisoned students / Testing has been left to the families, SHARGH DAILY (Feb. 27, 2023) (Doc. 257\_28).

wanted their children tested.<sup>921</sup> While not conclusive, this suggests that officials failed to gather or test relevant samples from all affected incidents, highlighting the investigations' lack of completeness.

Second, the Ministry of Intelligence claimed to have used "comprehensive" surveillance and obtained evidence from "target environments" through its investigation.<sup>922</sup> Yet in only one of our cases did officials reportedly review CCTV camera footage at all during the investigation.<sup>923</sup> This is despite the fact that in four of our cases, CCTV camera locations were published following reported incidents, with local journalists urging officials to review footage on these cameras to identify perpetrators.<sup>924</sup> In two such cases, a local MP even claimed she had viewed the footage, asserting that it proved the incidents were intentional.<sup>925</sup> The lack of information drawn from CCTV cameras cannot be explained by a suggestion that authorities do not regularly rely on CCTV footage; to the contrary, authorities proudly claimed to have used CCTV footage to identify a woman who was arrested for allegedly sending photos of affected girls in the hospital to "hostile media."<sup>926</sup> Once again, this suggests that investigators did not collect and/or utilize all relevant evidence.

Third, officials failed (at least publicly) to even launch investigations into four of our thirteen cases. This failure appears inexplicable in view of the extensive security powers and capacities at officials' disposal.<sup>927</sup> Instead it suggests, once again, that investigations into the poisoning incidents were not complete and overlooked not only important forms of evidence but entire incidents. Indeed, an MP from Parliament's investigatory commission said as much, publicly complaining that security officials had not made enough of an effort to investigate the poisonings.<sup>928</sup>

## *2. Lack of Transparency and a Preoccupation with Information Concealment*

In addition to being incomplete, the investigations led by Iranian officials also lacked transparency, and officials appeared more focused on information concealment than on

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<sup>921</sup> *Id.*

<sup>922</sup> See [Ministry of Intelligence's explanatory statement regarding school incidents in the country](#), ISNA (Apr. 28, 2023).

<sup>923</sup> [No toxic agents were found in the tests of Oom students](#), IRIB (Feb. 14, 2023) (Doc. 287\_24). In addition, the mayor of Shahinshahr requested all security footage following the incidents at Shahinshahr on April 11 (which included three of our cases). However, we found no information about whether this footage was ever provided, and four days later, authorities attributed the incidents to a natural gas leakage allegedly identified through soil and air samples taken from around the city. There was no mention of any security footage being reviewed or utilized in support of this conclusion. See *supra* Part II.B(i)(b).

<sup>924</sup> See *supra* Part II.B(i)(b).

<sup>925</sup> [Stink Bombs: New details about the poisoning incident of schoolgirls at two high schools and one elementary school in Borujerd](#), HAM MIHAN (Feb. 27, 2023) (Doc. 255\_16).

<sup>926</sup> [The person responsible for sending images of students being poisoned to hostile media outlets was arrested in Qazvin](#), IRNA (Apr. 20, 2023).

<sup>927</sup> [Political poisoning ! / Grossi's new opportunity in his trip to Tehran/What was the reason for the widespread reaction to Pirouz's death?](#), TABNAK NEWS (Mar. 2, 2023) (arguing that it is no secret Iran could easily discover the causes of the poisonings, with widespread and powerful intelligence capabilities at its disposal).

<sup>928</sup> [Latest news from the investigation of "Serial Poisoning in Schools" by the Ministry of Health's Scientific Committee](#), ISNA (Apr. 10, 2023).

information gathering. Rather than provide the public with transparent information about our cases, officials stonewalled domestic reporters while instructing the public to only use “official sources,”<sup>929</sup> and they failed to release any toxicology reports of the samples collected. Together with official news media, government officials contradicted prior information offered, they downplayed the severity of girls’ symptoms, and they cast doubt on whether the poisoning in one of our cases even happened at all.<sup>930</sup> Iranian officials failed in seven of our thirteen cases to ever provide updates or an explanation to the public about ongoing investigations.<sup>931</sup> Even in the six cases in which explanations were provided, each explanation failed to publish important supporting evidence purportedly relied on by officials.<sup>932</sup>

This lack of transparency also played out on the national level, so much so that by late February, official news outlets and even other government officials began admonishing those participating in the investigations for failing to provide “accurate reports and convincing answers” to the public.<sup>933</sup> Unfortunately, these demands were never met. As discussed above in Part B and in more detail in Section II, officials across the government and official news outlets began doing the opposite: obfuscating details about the poisonings, casting doubt on or outright denying whether incidents happened, downplaying girls’ symptoms, and/or attributing them to girls’ anxiety. One member of Parliament’s Health Commission effectively admitted that officials had intentionally withheld information.<sup>934</sup> Tellingly, relevant experts like teachers or doctors who had treated affected girls were also reportedly strongly discouraged from speaking about

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<sup>929</sup> See, e.g., [What did the poisoned students from Qom say about the repeated incident at Noor Technical School?](#), ISNA (Dec. 15, 2022) (Doc. 287\_16) (detailing Qom officials’ refusal to speak with ISNA about their investigation, “despite extensive efforts” made by ISNA journalists); [Repeat poisoning of Borujerd students, this time at the 15 Khordad High School](#), MEHR (Feb. 26, 2023) (Doc. 257\_25); [Families are worried, officials remain silent / Hospitals are not testing the poisoned students / Testing has been left to the families](#), SHARGH DAILY (Feb. 27, 2023) (Doc. 257\_28) (reporting that officials urged the public to only look to official news sources following the incidents at 15 Khordad and Ahmadiyya schools in Borujerd, but refused to speak with Iran-based journalists trying to gather more information); [Field report by a student journalist on the latest condition of the poisoned students of Shohada-ye 13 Aban School + video](#), STUDENT NEWS NETWORK (Mar. 1, 2023) (Doc. 359\_09) (according to Student News Network, their journalists were reportedly barred from officials at the scene from interviewing students or families, following the poisoning incident at 13 Aban Girls’ Middle School in Tehranasar).

<sup>930</sup> See *supra* Part II.A(i).

<sup>931</sup> See *id.* (describing, in seven of our cases, officials’ failure to provide any explanation or follow-up information about our cases to the public).

<sup>932</sup> See *supra* Part II.B(i) (discussing: the incident at Khayyam Girls’ High School in Pardis, Tehran Province, in which officials claimed guards nearby were also poisoned but did not provide any evidence; the incidents in Shahinshahr, Isfahan Province, which officials blamed on a mercaptan gas leak but where no odor reports were provided, a fact that state-affiliated news pointed out; and the incident in Shayan Girls’ High School in Isfahan City, Isfahan Province, which officials blamed on black smoke entering the school from a nearby excavator, but failing to provide video evidence documenting such black smoke or eyewitness statements confirming seeing black smoke).

<sup>933</sup> [The Causes and Perpetrators of Student Poisoning Should Be Introduced to the Public](#), ISNA (Mar. 1, 2023) (quoting MP for Tehran Mohsen Pirhadi); [Political poisoning ! / Grossi's new opportunity in his trip to Tehran/What was the reason for the widespread reaction to Pirouz's death?](#), TABNAK NEWS (Mar. 2, 2023) (criticizing the government for failing to be transparent about the poisonings and the ongoing investigations); see also *supra* Part II.A(ii) (detailing a number of officials and official news articles calling for transparent information).

<sup>934</sup> [26 provinces and 245 schools were involved in the poisoning/security forces were unable to find any foreign agents/they covered up the issue](#), ROUYDAD24 (Mar. 17, 2023) (quoting the official as saying that “cooperation [with investigations] did not happen here, because we were not honest with the people and hid the matter”).

incidents publicly.<sup>935</sup> Then, in early April, the government simply prohibited reporting on the poisonings altogether.<sup>936</sup> Even when national investigations finally announced results, they failed to publish critical supporting evidence like toxicology reports, a detailed list of samples gathered, or a description of tests run to analyze the samples. Nor did they even reference additional supporting evidence, like anonymous interviews from affected students and staff or CCTV footage.

Officials appeared more focused on controlling the information space and limiting what information was released rather than providing transparent evidence to the public. In several of our cases, security officials were reported to have been present to prevent or dissuade protests, or else to prevent citizens from filming what was happening.<sup>937</sup> Officials also threatened any citizen “spreading rumors” with the “security establishment,” and said that two people sending videos to “hostile networks” were summoned by security services in early March.<sup>938</sup> Between March and April, there were also reports of at least nine other Iranians being arrested for sharing videos and other content capturing the poisonings, along with charges filed against a journalist and three influential domestic news outlets for reporting on the poisonings.<sup>939</sup> Such efforts demonstrate an intentional effort to limit facts about the poisonings from circulating to the public.

In sum, Iran’s investigations into the poisonings, in addition to being biased, do not appear to properly take account of and document all relevant evidence, and they certainly did not provide disclosure to the public of relevant evidence. Instead, officials seemed to do the opposite, preventing information from reaching the public.

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<sup>935</sup> See *The mystery of the unknown gas*, HAM-MIHAN (Mar. 4, 2023) (reporting that doctors and nurses feared repercussions or disciplinary action from hospital administrators for speaking out, and some told Ham-Mihan that they had been explicitly instructed not to speak or share information about the incidents, orders that were believed to come from the Ministry of Health); see *infra* note **Error! Bookmark not defined.** (describing teachers’ avoiding speaking about incidents out of fear or being threatened if they speak out).

<sup>936</sup> See *supra* Part II.A(i)-(ii) (detailing the abrupt halt in reporting about the poisonings beginning in early April); Citizen Journalist, *Anger over Saqqez School Poisonings Triggers more Security, Censorship*, IRAN WIRE (Apr. 10, 2023) (Doc. 220\_30) (local journalist reporting that the Press Council in Saqqez, Kurdistan, had been prohibited from reporting on the poisonings); @Vahid, X <https://x.com/Vahid/status/1645074730414665730> (reposting an order by the Press Supervision Board under the Ministry of Cultural Affairs to refrain from reporting on the poisoning incidents on April 10, 2023).

<sup>937</sup> See *supra* note 521 (detailing plain clothes officers, likely part of a security detail, trying to prevent protests in front of the school after the March 1 incident at 13 Aban Girls’ Middle School, and security officials reportedly being at a hospital where a father tried to film his daughter and other girls but was prevented from doing so by the officials in Saqqez, Kurdistan).

<sup>938</sup> *Pardis County Governor: 35 poisoned students have been discharged from the hospital*, IRNA (Mar. 1, 2023) (Doc. 357\_22). National officials similarly threatened anyone who was caught sharing information about the poisonings. See, e.g., *Khatami: Judiciary should deal decisively with rumor-mongers in the students’ plight*, TASNIM (Mar. 10, 2023) (quoting Friday prayer leader in Tehran Ahmad Khatami who called for harsh treatment for anyone caught spreading rumors about the poisoning incidents, including anyone who blames religious figures); *Mohseni Ejei: 82,000 people have been granted amnesty/22,000 of those pardoned are rioters*, ISNA (Mar. 13, 2023) (quoting head of the Judiciary Mohseni Ejei, who called for “appropriate legal action” against those who spread rumors); *Students’ plight has become an opportunity for psychological operations*, TASNIM (Mar. 10, 2023) (quoting Ibrahim Azizi, deputy chairman of the National Security Commission in Parliament, who urged students to avoid “excessive fear and risky behavior” if they feel unwell and to instead simply tell school officials, seemingly an order to refrain leaving school and expressing distress to others).

<sup>939</sup> See *supra* Part II.B(ii) (detailing the reported arrests made with regards to the poisonings).



#### iv. Iran's Defective Investigations Produced Faulty Results

Ultimately, Iran's defective investigations produced results that appear to have espoused predetermined conclusions, unmoored from systematic gathering and analysis of evidence. Indeed, while an effective investigation does not necessarily need to produce results aligned with the victims' allegations, the Iranian government's results seem to have been arrived at without consideration of key existing evidence, indicating that the investigatory process itself was flawed.<sup>940</sup> Moreover, Iran's investigators failed to consider all possible perpetrators, omitting possibilities that were considered credible by Iranian officials and official news media at the time. Ultimately, such failures deprived victims of the effective remedy to which they are owed, in violation of Iran's due diligence obligations under the ICCPR and the CRC.

First, Iranian officials provided implausible explanations for six of our cases, and failed to provide any public explanation at all for the remaining seven.<sup>941</sup> For the six cases in which implausible explanations were provided, officials appeared to have simply ignored evidence that contradicted their explanations, such as affected student symptoms,<sup>942</sup> student accounts provided to domestic news outlets,<sup>943</sup> scientific evidence casting significant doubt on the official explanation,<sup>944</sup> or public statements of witnesses or relevant parties.<sup>945</sup> The official accounts also failed, as previously mentioned, to publish important supporting evidence.<sup>946</sup> For the remaining seven cases, Iran authorities simply failed to provide any explanation at all, a fact that seems discordant with the widespread security apparatuses at Iranian officials' disposal.<sup>947</sup> Such gaps indicate a legal failure to conduct effective investigations under international law.

Second, while the Ministries of Health, Interior, and Intelligence all claimed that mass hysteria was responsible for the vast majority of poisoning incidents, as detailed above in Part B, there is considerable evidence that contradicts this assertion. This includes the fact that officials claimed to have detected toxic agents during their investigations, that teachers and staff were also reported to have been affected, that the duration of hospital stays appear to have been longer than

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<sup>940</sup> See, e.g., *Kayak v. Turkey*, App. No. 4451/02, *supra* note 835 at ¶ 89 (finding investigation ineffective where authorities conducted an autopsy and simply declared a finding irrespective of other evidence).

<sup>941</sup> See *supra* Part II.B(i) (detailing the investigations into each of our cases).

<sup>942</sup> See *id.* (discussing: the incident at Sadr Girls' High School in Karaj, Alborz Province, in which girls can be seen in videos vomiting, coughing, struggling to breathe, and having difficulty standing, symptoms that are not aligned with the official explanation that the incident was caused by a nearby burning transformer that caused panic among the students).

<sup>943</sup> See *id.* (discussing: the incident at Khayyam Girls' High School in Pardis, Tehran Province, in which students reported odors different from the official explanation, which attributed the incident to a Naphtha leak).

<sup>944</sup> See *id.* (discussing: the incident at Khayyam Girls' High School in Pardis, Tehran Province, in which separate scientific expert reports outside of the country observed the high levels of concentration needed to poison girls with Naphtha gas, which would effectively have been impossible to achieve in the way officials described without lighting a fire and directing the gas towards the school with a fan).

<sup>945</sup> See *id.* (discussing: the incident at Khayyam Girls' High School in Pardis, Tehran Province, in which a gas officer is filmed on the scene by a bystander saying "nothing has leaked ma'am, it wasn't gas," casting doubt on the official explanation that incident was caused by a Naphtha leak; the three incidents in Shahinshahr, Isfahan Province, in which the local gas company, which was eventually blamed, the day of the incident was reported to have published a statement saying there was no gas leak and that this was fake news, and where the local mayor initially announced that the incident was a "crime").

<sup>946</sup> See *supra* note 932.

<sup>947</sup> [\*Political poisoning ! / Grossi's new opportunity in his trip to Tehran/What was the reason for the widespread reaction to Pirouz's death?\*](#), TABNAK NEWS (Mar. 2, 2023).

claimed, and that the symptoms reported from our cases do not all align with mass hysteria, including students' inability to move their legs and leg numbness and continuing to experience symptoms even days later. Nor did officials provide convincing evidence in support of the claim that the poisoning incidents were caused by mass hysteria.

Third, Iranian officials claimed that in the remainder of cases, the incidents not caused by mass hysteria were attributable to “non-toxic agents” like stink bombs, pepper spray, or tear gas. It is possible that “non-toxic agents” were used, but as detailed above in Part B, these agents do not typically inhibit one’s motor functions or cause numbness, symptoms found in our cases and reported in other cases as well. They also have common symptoms like eye irritation, which was only reported in two of our cases. Iranian officials claimed further that these “non-toxic agents” were used predominantly by students trying to get out of class. Yet again, as detailed in Part B, officials failed to provide details for this assertion, and an MP even called it not credible.<sup>948</sup>

Finally, officials ignored additional possibilities that were considered credible at the time, including the possibility that these acts were perpetrated by religious extremists or domestic terrorists, or else that they were carried out by an Iranian government organ or agent.<sup>949</sup> By ignoring these possibilities, they cast doubt on the credibility of their investigation’s process and results.

#### v. Iran Appears to Have Failed to Charge and Prosecute Perpetrators of the Poisoning Incidents

While our team identified eleven reported charges and arrests against individuals for sharing information about the poisonings, along with several reports of people arrested for protesting,<sup>950</sup> we did not find much reporting that detailed specific arrests of, or charges filed against, identified persons accused of carrying out the poisonings. In our cases, the driver of an oil tanker was arrested and accused of poisoning girls in Khayyam Girls’ School in Pardis, after he allegedly left the doors to his tanker open.<sup>951</sup> Yet as detailed in that case in Part I, there is evidence contradicting the state’s version of events, suggesting the driver was not responsible. In addition, two people from the local natural gas company in Shahinshahr were arrested for negligence following at least 11 reported poisoning incidents in Shahinshahr (three of which

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<sup>948</sup> See *It is unacceptable to say that the cause of the students' poisoning was balloons*, MOSTAGHAL (Apr. 11, 2023).

<sup>949</sup> See, e.g., *Timeline of the Student Poisoning Incidents; Everything Everyone Said from the Beginning to Today*, ROUYDAD24 (Mar. 10, 2023) (reporting that Fazel Meybodi, a professor in Iran, on February 26, 2023 allegedly attributed the poisonings to Hazara groups that are opposed to girls’ education, and Badamchian, the Secretary-General of the Islamic Coalition, who reportedly attributed the poisonings to ISIS or MEK); *Ensiya Khazali’s Reaction to the Serial Poisoning of Students*, ISNA (Mar. 2, 2023) (reporting on VP for Women and Family Affairs Ensiya Khazali’s tweet about the poisoning incidents in which she blames ISIS); *The Story of Serial Poisonings, Roots and Possibilities*, IRNA (Mar. 1, 2023) (listing extremist groups like the Taliban as a possible perpetrator); *The Story of Serial Poisonings, Roots and Possibilities*, IRNA (Mar. 1, 2023) (listing an internal security service as being a possible perpetrator); *Fazel Meybodi, a seminary scholar: A group known as the “millennialists” is behind the serial poisonings of girls’ schools*, ASRI IRAN (Feb. 26, 2023) (blaming a Takfiri Islamist group known as the “millennialists” for being behind the poisonings).

<sup>950</sup> See *supra* Part II.B(ii)(d).

<sup>951</sup> *The suspicious fuel tanker seen in Pardis had also been present in Qom and Borujerd; even the parking lot guards were poisoned*, TASNIM (Mar. 3, 2023).

were among our cases) on April 11.<sup>952</sup> Yet again, evidence we evaluated casts serious doubt on the responsibility of those individuals for those cases. In both cases, we did not find evidence that the individuals arrested were ever tried and convicted in a court of law with due process.

For other cases around the country, we found additional reports of a batch arrest four days later of more than 100 people, who officials alleged were responsible for the poisonings.<sup>953</sup> Yet few details were ever released about who these individuals were or what they were charged with, and officials later stated that these were not the “main perpetrators.”<sup>954</sup> Similarly, reports of another batch arrest occurred in June 2023, but we found few details of these arrests, or whether those arrested were ever tried in a court of law under due process.<sup>955</sup> Even one year later, no information appears to have been shared about prosecutions of any perpetrators,<sup>956</sup> nor was any information about perpetrator arrests included in the U.N. Fact-Finding Mission’s 2024 or 2025 reports.<sup>957</sup>

Contrasting this opacity were reports of arrests that involved students or those arrested or charged for protesting, reporting on, or speaking out about the poisonings. On March 7, officials stated that they had conducted arrests of perpetrators across six provinces, but the only details provided were those asserting that three of those arrested had engaged in recent unrest or had connections to foreign media outlets, one was arrested for taking videos at a school, and another was arrested because he was allegedly planning to spread “stimulants” through the school by using his child, and then film the children and send the videos to hostile media to create insecurity in the country.<sup>958</sup> Other officials announced that the arrests included a shopkeeper in

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<sup>952</sup> *What was the story behind the poisoning of students in Shahinshahr?* SHAHINSHAHRI INDEPENDENT NEWS AGENCY (Apr. 11, 2023) (Doc. 143\_17); *What was the cause of the student poisoning in Shahinshahr?* ISNA (Apr. 15, 2023) (Doc. 143\_27); *Arrest of 2 gas company personnel in connection with the release of pollutant gases in Shahinshahr*, TASNIM (Apr. 15, 2023) (Doc. 143\_28); *Arrest of 2 gas company employees due to negligence and the release of pollutant gases in Shahinshahr*, IRNA (Apr. 14, 2023) (Doc. 143\_29).

<sup>953</sup> *The number of school incidents has decreased/students should not be absent*, ISNA (Mar. 11, 2023). Several days later, the spokesman for FARAJA also announced that FARAJA had arrested 110 perpetrators. *Likely, the two groups are the same. 110 people arrested in connection with the “poisoning of students” case/ Stink bugs behind the events*, ISNA (Mar. 15, 2023).

<sup>954</sup> See *Asferi: The main culprits behind the students’ poisoning have not yet been arrested*, ISNA (Mar. 14, 2023) (MP and member of the Parliamentary Working Group saying that those arrested were not “the main perpetrators”). Officials did report arrests of several students they claimed were responsible for poisonings in Fars Province. Even assuming these students were in fact responsible for incidents in Fars Province, not even officials claimed that these students were responsible for all incidents across Iran. See *supra* Part II.B(ii).

<sup>955</sup> *Final report on student poisoning submitted to Parliament Speaker*, IRNA (June 11, 2023); *Traces of a deviant trend in the student poisoning incident/We have no sympathy for this dirty trend/A large number of these people are under surveillance and interrogation*, Iran Labor News Agency (June 27, 2023).

<sup>956</sup> See, e.g., *Hasti Amiri and Zia Nabavi were transferred to Evin Prison to serve their one-year prison sentence*, RADIO FARDA (Apr. 6, 2024).

<sup>957</sup> See generally *Detailed Findings of the Independent International Fact-Finding Mission*, *supra* note 705; *Consolidated Findings of the Independent International Fact-Finding Mission*, *supra* note 706.

<sup>958</sup> *Arrests of people linked to student poisoning in 6 provinces*, ISNA (Mar. 7, 2023); *Three of those arrested have criminal records, including involvement in recent riots*, IRNA (Mar. 7, 2023). Note that other officials announced other arrests, and it is unclear whether these arrests are the same. They included the arrest of a shopkeeper in North Khorasan, who allegedly sold materials to a student to poison the school, and five people in Larestan, who were accused of using nitrogen gas in several schools to poison 53 students, filmed the incidents, and distributed them to hostile media networks like Iran International.

North Khorasan, who allegedly sold materials to a student to poison the school.<sup>959</sup> In addition, five people – three female students, a male friend, and one of the girl’s fathers – were reported to have been arrested in Larestan, accused of using nitrogen gas in seven schools, filming the incidents, and distributing them to hostile media outlets like Iran International.<sup>960</sup> The father and daughter were filmed making what was reported to be a forced confession.<sup>961</sup> Two students in May were also reported to have been arrested for throwing cleaning cloths onto a stove, releasing a smell, and leaving class.<sup>962</sup> In addition, the media outlets Ham-Mihan, Shargh Daily, Rouydad24, along with the site manager for Qom News, were all criminally charged, as was a blogger in Urmia, for reporting on the poisoning incidents. On March 8, three people were arrested and sent to prison for “spreading rumors” about the poisonings in Sanandaj.<sup>963</sup> On March 13, someone operating an unspecified Instagram account was arrested and charged for “attempting to disturb public opinion regarding recent events and the serial poisoning of students.”<sup>964</sup> On March 15, three people were arrested in Tehran for posting on social media about the poisonings.<sup>965</sup> On April 20, authorities arrested a woman in Qazvin for sending photos of girls in the hospital from a poisoning incident to “hostile media.”<sup>966</sup> On April 28, the government arrested three university students for protesting the ongoing poisonings.<sup>967</sup> According to the FFMI, by August 2023, 48 cases had been filed across eight provinces against individuals arrested for spreading rumors, encouraging protests, or causing fear about the poisonings.<sup>968</sup>

Although we were unable to reach a definitive conclusion on the question, such a contrast between the information available about those charged with spreading rumors about the poisonings, and the paucity of information available about those charged with carrying out the poisonings, raises significant doubts about whether Iran ever actually charged and prosecuted perpetrators of the alleged school poisonings, and whether it did so under a court of law with due process.

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<sup>959</sup> *One person arrested in connection with poisoning of students at a Bojnourd school*, ISNA (Mar. 7, 2023); *One person arrested in connection with poisoning of North Khorasan students*, IRNA (Mar. 7, 2023).

<sup>960</sup> *Arrest of perpetrators of nitrogen gas attack on 7 schools*, ISNA (Mar. 7, 2023).

<sup>961</sup> *Who are the citizens who have been arrested as perpetrators of school poisoning?* IRANWIRE (Apr. 23, 2023).

<sup>962</sup> *Mischief of 2 Eqlid students to cancel exam*, IRIB (Mar. 16, 2023).

<sup>963</sup> *Three suspects arrested for spreading rumors about poisoning of students in Sanandaj*, IRIB (Mar. 8, 2023).

<sup>964</sup> *Identification and arrest of the person responsible for spreading lies and disturbing public opinion in Hormozgan*, ISNA (Mar. 13, 2023).

<sup>965</sup> *Indictment issued for "Sadegh Ziba Kalam" and "Azar Mansouri,"* TASNIM (Mar. 15, 2023).

<sup>966</sup> *The person responsible for sending images of students being poisoned to hostile media outlets was arrested in Qazvin*, IRNA (Apr. 20, 2023).

<sup>967</sup> See Iranian Writers’ Community (IWAC), FACEBOOK (Apr. 28, 2023) [https://www.facebook.com/story.php/?story\\_fbid=174281072230179&id=100089448601731&\\_rdar](https://www.facebook.com/story.php/?story_fbid=174281072230179&id=100089448601731&_rdar); see also *Students Arrested and Banished, Professors Fired in Latest State Crackdown in Iran*, CENTER FOR HUMAN RIGHTS IN IRAN (June 1, 2023) <https://iranhumanrights.org/2023/06/students-arrested-and-banished-professors-fired-in-latest-state-crackdown-in-iran/>.

<sup>968</sup> *Detailed Findings of the Independent International Fact-Finding Mission*, *supra* note 705 at ¶ 1379.

## PART IV: POSSIBLE ACCOUNTABILITY AVENUES AND NEXT STEPS

As detailed in Part III, assuming the poisonings are attributable to Iranian state organs or agents, Iran violated the ICCPR's prohibition on CIDT, the CRC and the ICCPR's prohibition on violence against children, the ICESCR's right to health, and the prohibition of sex discrimination under all three treaties. Even assuming the poisonings are not ultimately found to be attributable to Iranian state agents or organs, Iran still violated its due diligence obligations under the ICCPR and the CRC, and likely also violated the prohibition on sex discrimination in the way it carried out its due diligence obligations. Iran also violated the ICESCR's right to health, because the state withheld health-related information, along with the ICESCR's right to education, given Iranian officials' failure to ensure a safe learning environment. Given these violations, we outline several possible next steps and avenues to pursue accountability.<sup>969</sup>

### A. International Human Rights

Iran has not ratified the optional protocols under the ICCPR, the CRC, or the ICESCR that would allow for individual complaints to be filed with the relevant U.N. bodies alleging Iranian state violations of its obligations. Instead, the treaty bodies may pursue their own periodic reviews of Iran's compliance with these treaties. The poisonings would be relevant for such inquiries should they be pursued. Two additional possible pathways for accountability for the poisonings are explored below: leveraging the ongoing U.N. fact-finding mission investigating human rights abuses in Iran and utilizing universal jurisdiction provisions in domestic courts to bring a possible case involving crimes against humanity (with other alleged abuses, assuming the state is responsible for the poisonings).

#### i. Ongoing Independent International Fact-Finding Mission on Iran

One possible avenue for accountability is the ongoing Independent International Fact-Finding Mission in Iran (FFMI) established by the Human Rights Council, whose mandate has been extended through April 2026.<sup>970</sup> The FFMI has, to date, produced detailed documentation of the human rights abuses that occurred in Iran during the 2022-23 protests and the continued repression being carried out against those who participated or supported the protests.<sup>971</sup> The FFMI has also laid out a possible case of gender persecution as a crime against humanity based on these abuses and the systematic impunity of rights abusers.<sup>972</sup> The FFMI's latest mandate involves monitoring and investigating allegations of recent and ongoing serious human rights

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<sup>969</sup> Ultimately, we do not explicitly recommend one course of action. This is because this report was produced independently of any person directly affected by these incidents. Out of ethical concerns, we abstain from making any specific recommendations, in hopes that those affected by direct what happens next.

<sup>970</sup> Human Rights Council, *Situation of Human Rights in the Islamic Republic of Iran*, A/HRC/58/L.20/Rev.1, ¶ 7 (Mar. 28, 2025) <https://docs.un.org/en/a/hrc/58/l.20/rev.1>.

<sup>971</sup> See generally *Detailed Findings of the Independent International Fact-Finding Mission*, *supra* note 705; 705 *Consolidated Findings of the Independent International Fact-Finding Mission*, *supra* note 706.

<sup>972</sup> *Id.*



violations in Iran along with establishing facts, circumstances, and structural causes of such violations, and collecting and preserving evidence of them.<sup>973</sup>

Providing additional documentation and information about the poisoning incidents in addition to what the FFMI has already collected may provide supplementary support for the FFMI to find that these poisoning incidents in fact occurred, schoolgirls suffered real symptoms, circumstantial evidence suggests plausible Iranian state responsibility, the government failed to adequately protect, prevent, and investigate the incidents, and the government appears to have tried to conceal facts about the incidents, all in violation of Iran's obligations under the ICCPR, the CRC, and the ICESCR.

While fact-finding missions are not judicial bodies, they do have the ability to establish a reliable record of fact regarding alleged human rights violations in Iran. This record can be used later on by independent legal proceedings.<sup>974</sup> More broadly, it can also be leveraged as an alternative form of justice in and of itself, establishing a record of truth that can validate victims' experiences and publicly recognize their suffering.<sup>975</sup>

## ii. Crimes Against Humanity in Domestic Courts Using Universal Jurisdiction Provisions

An additional possibility for accountability is through domestic courts' universal jurisdiction provisions. While these provisions vary in terms of what crimes they cover, most cover at minimum crimes against humanity, torture, genocide, or war crimes.<sup>976</sup> Thus as a first step, the poisonings would need to constitute one of these four crimes. Crimes against humanity is one possibility, provided that lawyers and investigators could identify evidence attributing the poisonings to state organs or agents. Assuming they can do so, the poisonings are best situated within a case alleging crimes against humanity that incorporates other additional human rights violations that were documented at the time;<sup>977</sup> prosecutors would need to establish that the

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<sup>973</sup> *Situation of Human Rights in the Islamic Republic of Iran*, *supra* note 970 at ¶ 7.

<sup>974</sup> This potential function was endorsed by the Human Rights Council in the Mission's latest mandate extension. *See id.* at ¶ 7(c).

<sup>975</sup> *See, e.g.*, G.A. Res. 21/7, Right to the Truth, A/HRC/RES/21/7 (Oct. 10, 2012) <https://docs.un.org/en/A/HRC/RES/21/7> (recognizing the "importance of respecting and ensuring the right to the truth so as to contribute to ending impunity and to promote and protect human rights"); *Global Justice, Truth-Telling and Healing*, INSTITUTIONAL ANTIRACISM AND ACCOUNTABILITY PROJECT (Oct. 2024) <https://ash.harvard.edu/wp-content/uploads/2024/10/Symposium-Report-Oct-28-FINAL.pdf> (detailing the vitality of truth telling for transformational justice); *Transitional Justice Tools: Truth Seeking*, U.S. HOLOCAUST MEMORIAL MUSEUM <https://www.ushmm.org/genocide-prevention/simon-skjodt-center/work/ferencz-international-justice-initiative/transitional-justice/truth-seeking> (describing the importance of truth to repair past suffering and help support prevention of future atrocities).

<sup>976</sup> *See* Celeste Kmiotek, Nushin Sarkarati, and Alana Mitias, *Practitioner's Manual: Holding the Islamic Republic of Iran Accountable for Atrocity Crimes*, ATLANTIC COUNCIL 2 (Apr. 2023) [https://www.atlanticcouncil.org/wp-content/uploads/2023/05/PractitionersManual\\_HoldingIran\\_050523.pdf](https://www.atlanticcouncil.org/wp-content/uploads/2023/05/PractitionersManual_HoldingIran_050523.pdf).

<sup>977</sup> *See, e.g.*, Maddie Wong et. al., *The Blinding of Protesters and Bystanders in Iran*, BERKELEY HUMAN RIGHTS CENTER (Sept. 2024) <https://humanrights.berkeley.edu/publications/the-blinding-of-protesters-and-bystanders-in-iran/> (detailing 124 blinding incidents during the "Woman, Life, Freedom" movement); Jess Peake et. al., *Disappearances, Deaths, and Denials*, THE DIGITAL INVESTIGATIONS LAB, UCLA LAW SCHOOL (Jan. 2025) <https://law.ucla.edu/sites/default/files/PDFs/ICLP/FINAL-Disappearances-Deaths-and-Denials.pdf>; *see generally Detailed Findings of the Independent International Fact-Finding Mission*, *supra* note 705.

poisonings had a nexus to a broader pattern of “widespread and systematic” attacks targeting women and children in Iran during the “Woman, Life, Freedom” movement, pursuant to or in furtherance of state policy.<sup>978</sup> Assuming that it can be established that the poisonings were carried out by Iranian state organs or agents, lawyers can point to the Iranian government’s failure to prevent further poisonings, protect girls during the poisonings, and properly investigate the poisonings, along with their apparent concealment of the poisonings, as detailed in this Report, to help demonstrate that such acts were committed in pursuance of a state policy.<sup>979</sup>

Moreover, if it can be established that the poisonings are attributable to Iranian state organs or agents, the poisonings may bolster the broader argument that Iran committed a series of acts targeting women and girls during this time that amounted to gender persecution as a crime against humanity.<sup>980</sup> To prove gender persecution, one would need to show that the poisonings amounted to “severe” deprivation of one or more fundamental rights, and that girls or women were targeted in Iran on the basis of gender.<sup>981</sup> Severe deprivations can be shown through cumulative acts, rather than just one set of violations.<sup>982</sup> The poisonings, which largely affected schoolgirls, can be cited as one of several acts in Iran during this time that severely deprived girls and women of their fundamental rights.<sup>983</sup> Importantly, the poisonings, if attributable to Iran, may be used even to support a gender persecution claim even if the FFMI does not end up obtaining toxicology reports confirming the use of a toxic agent, as the girls’ symptoms were undeniably real, and international jurisprudence indicates that severe deprivations of fundamental rights does not necessitate physical acts.<sup>984</sup>

Should lawyers seek to bring allegations that Iran committed gender persecution that amounted to a crime against humanity, they may seek to do so in several European courts with universal jurisdiction provisions such as France, Germany, the Netherlands, Sweden, or Switzerland.<sup>985</sup>

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<sup>978</sup> Rome Statute of the International Criminal Court, 2187 U.N.T.S. 3, art. 7(1) (adopted 17 July 1998, entered into force 1 July 2002).

<sup>979</sup> *Detailed Findings of the Independent International Fact-Finding Mission*, *supra* note 705 at ¶¶ 1620-21 (finding that a series of violations in Iran were committed in furtherance of a State policy on the basis of, among others, organized concealment of violations and the State’s systematic failure to prevent, investigate, prosecute, and punish them).

<sup>980</sup> *See Detailed Findings of the Independent International Fact-Finding Mission*, *supra* note 705 at ¶1692 (finding that the threshold for persecution on the basis of gender as a crime against humanity has been met).

<sup>981</sup> *Id.* at art. 7(1)(g).

<sup>982</sup> *Prosecutor v. Nahimana, Barayagwiza & Ngeze*, Case No. ICTR-99-52-A, Judgment (Appeals Chamber), ¶ 987 (Nov. 28, 2007) (recognizing that severity is “the cumulative effect of all the underlying acts of the crime of persecution”).

<sup>983</sup> Such fundamental rights in this case could include, as detailed above, the prohibition on CIDT, the prohibition on violence and abuse of children, and the right to redress for victims, along with possibly other rights violations like the rights to education or health. *See supra* Part III; *see also* *Prosecutor v. Kupreškić*, Case No. IT-95-16-T, Judgment (Trial Chamber), ¶ 621 (Jan. 14, 2000) (recognizing that fundamental rights can encompass a broad array of violations and rejecting an exhaustive list).

<sup>984</sup> *See Policy on the Crime of Gender Persecution*, INTERNATIONAL CRIMINAL COURT 12 (Dec. 2022), <https://www.icc-cpi.int/sites/default/files/2022-12/2022-12-07-Policy-on-the-Crime-of-Gender-Persecution.pdf> (including psychological duress or attacks on schools as possible examples of gender persecution); *see also* *Prosecutor v. Ongwen*, Case No. ICC-02/04-01/15-1762-Red, Public Redacted Trial Judgment, ¶ 2717 (Feb. 4, 2021) (recognizing forced pregnancy as a severe deprivation of a fundamental right, an act that was found to deprive the victim of her right to personal and reproductive autonomy and her right to family).

<sup>985</sup> *See Celeste Kmiotek, Nushin Sarkarati, and Alana Mitias*, *supra* note 976.

Other experts have written at length on what this might involve, but at minimum, lawyers would want to file a request to open an investigation with the appropriate authorities.<sup>986</sup> Should the case move forward, lawyers will want to be cognizant of additional concerns that could be implicated in the process, like the need to protect the rights of witnesses and victims.<sup>987</sup>

## B. Possible Lack of Adherence to Obligations under the Chemical Weapons Convention

In addition to its obligations under international human rights law, Iran is a party to the Chemical Weapons Convention (CWC).<sup>988</sup> Under the CWC, Iran is prohibited from using chemical weapons or else assisting, encouraging, or inducing anyone to use chemical weapons.<sup>989</sup> Chemical weapons are defined in the CWC as any chemical that can cause “death, temporary incapacitation, or permanent harm.”<sup>990</sup> There is no definition in the CWC of what “temporary incapacitation” entails; one proposed definition defines incapacitants as those that produce a “disabling condition,” such as disorientation, hallucination, sedation, incoherence, or loss of consciousness.<sup>991</sup> It is highly possible some of the girls’ symptoms amount to “incapacitation” as understood in the CWC, particularly where they fainted, felt sleepy or fell asleep, lost feeling in their legs and hands, and/or were unable to walk.<sup>992</sup> Given that the use of toxic agents in the poisonings would not qualify as a “purpose[] not prohibited” under the CWC,<sup>993</sup> should girls have been “incapacitated,” Iran could have violated its obligations under the CWC.<sup>994</sup>

Iranian officials denied that a “toxic agent” had been used in any poisoning incident.<sup>995</sup> Instead, officials identify several “non-toxic agents,” amounting to tear gas or pepper spray under the CWC, that were used in a minority of cases (in the rest, they allege no toxic agent was used at

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<sup>986</sup> *Id.*

<sup>987</sup> *Id.*

<sup>988</sup> *Member States: The Islamic Republic of Iran*, ORGANIZATION ON THE PROHIBITION OF CHEMICAL WEAPONS <https://www.opcw.org/about-us/member-states/iran-islamic-republic>.

<sup>989</sup> Convention on the Prohibition of the Development, Production, Stockpiling, and Use of Chemical Weapons and Their Destruction (hereinafter Chemical Weapons Convention), art. I(1)(a), (d), 1974 U.N.T.S. 45, (Jan. 13, 1993).

<sup>990</sup> *Id.* at Art. II(1)(a), (2); *see also* Chemical Weapons Convention, Annex on Chemicals, Section B (“for the purpose of implementing this Convention, these Schedules ... do not constitute a definition of chemical weapons”).

<sup>991</sup> Michael Crowley, *Dangerous Ambiguities: Regulation of Incapacitants and Tear gas or pepper spray Under the Chemical Weapons Convention*, OPCW OPEN FORUM MEETING 14 (Dec. 2, 2009)

[https://www.opcw.org/sites/default/files/documents/CSP/C-14/open-forum/Dangerous-Ambiguities-Regulation-of-Riot-Control-Agents-and-Incapacitants-under-the-Chemical-Weapons-Convention\\_Rev.1.pdf](https://www.opcw.org/sites/default/files/documents/CSP/C-14/open-forum/Dangerous-Ambiguities-Regulation-of-Riot-Control-Agents-and-Incapacitants-under-the-Chemical-Weapons-Convention_Rev.1.pdf) (referencing INCAPACITATING BIOCHEMICAL WEAPONS (Pearson, A., Chevrier, M. and Wheelis, M. eds, 2007).

<sup>992</sup> *See supra* Part I.C (listing the symptoms experienced by girls in our cases).

<sup>993</sup> Chemical Weapons Convention, art. II(1)(a) (defining “chemical weapons” as “toxic chemicals ... except where intended for purposes not prohibited under this Convention”); art. II(9) (identifying the following as “purposes not prohibited” under the CWC: industrial, agricultural, research, medical, pharmaceutical, or other peaceful purposes; protective purposes; military purposes not connected with the use of chemical weapons; and law enforcement purposes).

<sup>994</sup> More facts might need to be collected to strengthen the plausibility that Iranian state organs or agents were responsible.

<sup>995</sup> *See Ministry of Intelligence’s explanatory statement regarding school incidents in the country*, ISNA (Apr. 28, 2023) (asserting that no “toxic agent” had been used).

all).<sup>996</sup> As detailed above in Part I.C, there is reason to doubt that tear gas or pepper spray alone were responsible, at least for the cases we examined, given symptoms among affected girls that are unlikely to have been caused by tear gas or pepper spray.<sup>997</sup>

Should any state parties to the CWC believe Iran violated its obligations, they may request the CWC's Executive Council to seek clarification from Iran about whether a violation of the CWC has occurred.<sup>998</sup> In the event of Iranian non-compliance, state parties may then request an investigation with the Director-General into allegations of chemical weapons uses.<sup>999</sup> Should the Director-General decide to pursue an investigation, the investigatory team has the authority to assert a right of access to any and all areas where the alleged use of chemical weapons occurred, the right to collect samples, and the right to conduct interviews, among other powers.<sup>1000</sup> Following inspections, the team is required to produce a final report summarizing the factual findings of the inspection, along with the investigation process and the supporting evidence used to determine its findings.<sup>1001</sup>

Without toxicology reports, it may be too soon for states parties to request an investigation under Article X of the CWC. But the possibility of a CWC violation should prompt states parties to invest appropriate resources into identifying and gathering further evidence about the alleged poisoning incidents that could support an eventual request to the Director-General. Such evidence might include more open-source documentation and verification of individual incidents, toxicology analyses, and other appropriate forms of documentation about the poisoning incidents.

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<sup>996</sup> Chemical Weapons Convention, art. II(2); *Id.* at Art. 3(7) (defining riot control agent as any chemical not listed in the CWC that can produce “sensory irritation” or “disabling physical effects” within a short time).

<sup>997</sup> *See supra* Part III.D(iv)(c) (casting doubt on the government’s assertion that the poisoning incidents were caused by “non-toxic agents” including tear gas or pepper spray).

<sup>998</sup> Chemical Weapons Convention, art. IX(3). The Convention urges states to seek to resolve questions about compliance among themselves, *id.* Art. IX(2), but this is without prejudice of the right of a state to assist the Executive Council in clarifying questions about another state’s potential non-compliance with the Convention, *id.* Art. IX(4), including the right to request an on-site challenge inspection. *Id.* Art. IX(8).

<sup>999</sup> Chemical Weapons Convention, Part XI.B(3). When requesting an investigation, they should provide, to the extent possible, information about details related to the alleged use including when and where chemical weapons were alleged to have been used, type of weapon believed to have been used, its characteristics, and the effects of the toxic agent, among other details.

<sup>1000</sup> *Id.* at Part XI.C.

<sup>1001</sup> *Id.* at XI.D(25).

## CONCLUSION

This Report aimed to document some of the poisoning incidents in Iran that were reported in girls' schools during the "Woman, Life, Freedom" protests, to detail how the Iranian government responded, and to discuss the legal implications of the government's response, using open-source information.

While this Report is quite detailed, the work can be grouped into four areas. First, this Report catalogues open-source evidence showing that, contrary to alternative claims, poisoning incidents did occur in Iranian schools during the "Woman, Life, Freedom" protests. Detailing thirteen cases of likely poisonings, this Report demonstrates that schoolchildren – all girls, in our cases – experienced real symptoms that included loss of feeling in hands and legs, inability to walk, dizziness, nausea and vomiting, coughing and difficulty breathing, and possible loss of consciousness, among others. These symptoms came from a toxic agent inhaled by the schoolgirls and, in several cases, by teachers and school administrators as well. Possible toxic agents that caused the girls' symptoms could include ammonia, chloramide, or hydrogen sulfide, although without toxicology analyses of a representative set of samples that are conducted by experts it's impossible to say with any certainty. While Iranian officials claim that "non-toxic agents" like pepper spray or tear gas were used in a minority of cases, the evidence from our cases suggests that it is unlikely these agents were used alone, given the symptoms girls experienced.

Second, this Report chronicles the Iranian government's response to our cases and to other poisoning cases around the country. This chronicling was subdivided between statements and reporting by officials and state-affiliated news outlets, and official actions taken in response to the poisonings. The trends in reporting and statements suggest that over time there was a concerted effort to prevent information about the poisonings from reaching the public, to cast doubt on information that did reach the public about the poisonings, and to intentionally spread a narrative that attributed the poisonings to mass hysteria instead. These are demonstrated in part by abrupt shifts in how officials and state-affiliated news outlets discussed the poisonings, and an eventual coalescing around a specific narrative that these incidents were psychological. Initially, for the first two incidents in Qom, state-affiliated news outlets other than ISNA published limited articles on the poisonings, although they did refer to the incidents as cases of "respiratory" poisoning. Qom officials refused to answer follow-up questions, attributed the girls' symptoms to "stress," and prohibited non-state-affiliated news outlets from collecting information on the scene. Then, there was an explosion in the number of reported incidents across the country. Officials and news outlets responded by commenting and reporting on the incidents as poisonings, demanding more information, and referring to the acts as intentional. Subsequently, however, there was a sudden and dramatic shift away from such accounts of the poisonings. Officials and state-affiliated news outlets began blaming the media for drumming up societal panic about the poisonings, and attributing the incidents to girls' hysteria and anxiety rather than a toxic agent, harkening back to how Qom officials first responded. They further encouraged the public to only use "official" news outlets for information about the poisonings and to ignore rumors, they prevented reported from interviewing affected girls, and they threatened people with force should they distribute videos of the incidents. At the start of the new Persian year, officials and state-affiliated news outlets largely refused to publish any information about the



continuing poisoning incidents at all. When they did, they refused to use the word “poisoning and focused on girls’ alleged anxiety.

For official actions taken, we looked at safety and security measures taken following poisoning incidents, and follow-up investigations and arrests. Regarding safety and security measures, officials appeared to prioritize minimizing information about the poisoning incidents from spreading, and failed to take reasonable steps to enhance school and student safety following the incidents. In our cases, emergency personnel did arrive to affected schools in our cases, but in five cases (all occurring after the start of the Persian new year), girls were reported to have been prevented from leaving, and evidence suggests that they could have been prohibited from doing so by the Ministry of Education. Officials did not take additional measures to protect schools from future incidents and appeared preoccupied with preventing information about the incidents from reaching the public; security officials in our cases were reported to have been focused on preventing non-state-affiliated personnel from filming or interviewing affected students or on dissuading protests. Beyond our cases, officials announced security actions but appear to have never actually followed through. Instead, schools were left to enhance their own security, a situation that got so dire, the Coordinating Council of Teachers’ Unions called for “human chains” to be formed around schools.

Regarding official follow-up investigations and arrests, officials announced investigations but failed to identify reliable explanations. For our cases, no results were announced for seven cases, and in the remaining six, officials offered explanations that lacked evidentiary support or were contradicted by other evidence. Two arrests (for four cases) were announced, but we found fairly convincing evidence indicating the alleged perpetrators were not responsible. Nationally, officials launched numerous investigations but over time, the investigations became oriented around treating the incidents as psychological, and not physical, a conclusion for which limited supporting evidence was provided. Eventually, government officials concluded that the vast majority of poisoning incidents were caused by mass hysteria, and the small remainder was caused by “non-toxic agents” used by students trying to get out of class or people trying to stoke unrest. Moreover, officials announced arrests of over one hundred alleged perpetrators (one hundred in March and one hundred in June, although it is unclear whether there is overlap between each group), but few details were ever provided, nor could we find any information about whether these alleged perpetrators were ever tried in a court of law under due process. In contrast, details were shared of at least eleven people arrested for sharing information about the poisoning incidents, and the government sanctioned at least three news outlets for the same. By August 2023, according to the FFMI, 48 cases had been brought against people for protesting, causing unrest, or sharing information about the poisonings. Contrastingly, little information was ever shared about the alleged perpetrators or judicial proceedings taken against them.

Third, this Report analyzes the poisoning incidents and the government’s response under international human rights law. The poisonings likely constituted violations of several international human rights law treaties to which Iran is a party, including the International Covenant on Civil and Political Rights (ICCPR), the International Covenant on Economic, Social, and Cultural Rights (ICESCR), and the Convention on the Rights of the Child (CRC). These include a child’s right to be free from violence, the prohibition on cruel, inhumane, and

degrading treatment (CIDT), the right to health, the right to education, and the prohibition on discrimination on the basis of sex.

Iranian state organs or agents violated these rights under two theories. First, there is circumstantial evidence suggesting a plausible case that the poisoning incidents were attributable to Iranian state organs or agents. This includes the state's failure to seriously investigate, despite boasting a powerful security apparatus; the unlikelihood that non-state actors could have carried out these poisonings undetected in Iran, a state with a sophisticated intelligence and security apparatus; officials' preoccupation with covering up information about the poisoning incidents; officials' abrupt shifts in explanations about the poisoning incidents away from referring to them as intentional poisonings; and the implausible explanations eventually provided by Iranian officials for the poisoning incidents. The second theory of Iranian state responsibility is under a due diligence theory, under which even if the poisoning incidents are not attributable to Iranian state agents or organs, Iran still violated its human rights obligations by failing to take reasonable steps to prevent the violation of the students' human rights and by failing to provide effective remedies to the victims, including failing to conduct an impartial or thorough investigation that produced genuine results. Iran also appears to have failed to charge and prosecute perpetrators in a court of law under due process. Moreover, to the extent these failures were related overwhelmingly to the violation of girls' rights, the Iranian government also engaged in sex-based discrimination in failing to meet its due diligence obligations.

Fourth and finally, this Report presents several possible accountability avenues for the poisoning incidents. These include the possibility of utilizing universal jurisdiction provisions under domestic courts to bring a possible case alleging gender persecution as a crime against humanity, provided it can be established that the poisonings are attributable to the state and provided that the poisonings can be shown to have a nexus to the Iranian government's broader state policy of carrying out "widespread and systematic" attacks that violated the human rights of women and girls in Iran during the "Woman, Life, Freedom" movement. In addition, providing additional documentation and information about the poisonings to the FFMI, whose mandate has been extended to April 2026, may allow for a reliable record of fact that can be used later on in legal proceedings, or else can be leveraged on its own as an alternative form of justice. A third option is for state parties to the Chemical Weapons Convention (CWC) to request the CWC's executive council to seek clarification from Iran about whether a CWC violation occurred with respect to the poisonings. Should Iran fail to comply, state parties may then request an investigation from the Director-General to investigate chemical weapons uses with respect to the poisonings.

By documenting incidents of likely poisoning, detailing the Iranian government's response, and analyzing whether this response was legal under international law, we hope to advance efforts that reveal the truth about these poisoning incidents, and to strengthen the possibility that the schoolgirls who experienced the poisonings may one day get the justice they deserve. Equally as important, we hope to ensure those affected are not forgotten, and their suffering is not ignored.