In the name of God, the Most Compassionate, the Most Merciful

The Honorable People of Iran,

Since the establishment of the Pahlavi regime, which was formed and consolidated by the British colonial power in Iran, both Reza Shah Pahlavi, the coup leader, and his son Mohammad Reza Shah, have been the origin of the plundering and embezzling of the wealth and assets of the Iranian nation and the country of Iran. The financial corruption and plundering of the property and assets of the Iranian people by the Pahlavi court is well known, and in this regard, not only have the confessions of courtiers and historians been recorded, but there are also credible documents.

1. The Looting of Property by Reza Shah Pahlavi:

With the coup of 3rd of Esfand, 1299 (1921), which was supported by foreign mercenaries and masterminded and executed by the British Empire, Reza Khan, a former horse groom for the Dutch embassy who became the commander of the Cossack Brigade, emerged as a dictatorial figure in Iranian politics. His greed for land and wealth was the main driving force behind his rise to power. In his memoirs, General Hossein Fardoust states: “Throughout his reign, Reza Khan used the power of bayonets to seize the fertile lands of the north and register them in his name. After his fall, newspapers and journals were filled with reports of his land grabs. In 1319 (1940), the net annual income from Reza Shah's properties was 62 million tomans, which, based on the income and budget of the country at the time, amounts to hundreds of billions of tomans by today's standards.” Some reports mention 600 million marks of foreign reserves held by Reza Shah in European countries. European newspapers reported after Mohammad Reza Shah's trip to Britain in 1948, referring to Reza Shah’s currency reserves in banks in England and Switzerland, suggesting that the trip was aimed at liberating those foreign reserves.

Reza Shah's relentless desire to acquire prime lands across Iran led him to seize them by force, registering their ownership under his name. These seized lands were not limited to the fertile northern regions; even in the villages around Tehran, properties were registered in his name. The question arises as to how a man who, in his early years of fame, had to borrow money to buy a house in Tehran could, within 15 years, become the wealthiest king in Asia and the owner of the most valuable lands in Iran. Marvin Zonis writes: “When Reza Khan was deposed, more than 2,000 villages were in the hands of the new king. Based on a ratio of 4.8 people per family, about 235,800 people directly served the monarch as feudal serfs.” At this stage, land ownership was registered according to the new land registration laws, and deeds were issued. When Reza Shah left the country, he owned about 10% of the agricultural land in Iran; however, since these lands were among the most fertile, their value and annual income far exceeded 10% of the total agricultural lands in the country.

2. The Looting of Property by Mohammad Reza Shah Pahlavi and his Associates:

On the verge of leaving the country in September 1941, Reza Shah transferred all his assets to his son, Mohammad Reza. In order to avoid growing protests over the expropriation of Reza Khan’s properties, Mohammad Reza Shah, following the advice of Mohammad Ali Foroughi, initially transferred these properties to the state. However, after eight years, through a legislative act, these properties were returned to him. During the reign of Mohammad Reza Shah, various organizations were established to manage these properties, such as the Pahlavi Properties Office, the Pahlavi Foundation, and the Pahlavi Trust, all under the supervision of Asadollah Alam, who amassed millions of tomans in ill-gotten wealth.

The last financial organization Mohammad Reza Shah established in the early 1960s was the Pahlavi Foundation. In the 1960s, the regime began to introduce land reforms. Official ceremonies were held where land deeds were handed to the peasants. However, the valuable lands of the Pahlavi Foundation were never distributed among the farmers.

In some villages, lands were seized by the Shah's siblings. For instance, Abdolreza Pahlavi forcibly took over vast lands, approximately 3,700 hectares, in the Dasht-e-Naz area, 20 kilometers northeast of Sari, and 18 kilometers from the Caspian Sea. Another brother, Gholamreza, seized lands in the Arzoo village, stretching to "Balord" in Sirjan and took vast areas in Eastern Azerbaijan, which were declared royal hunting grounds. The inhabitants of these villages, numbering more than 10,000 people, were forcibly relocated.

Moreover, the Pahlavi family, through the financial corruption that prevailed in the royal court, looted immense wealth and assets. The Pahlavi regime was notorious for corruption and bribery. According to the most optimistic estimates, between 1973 and 1976, government officials received at least one billion dollars in commissions. Hossein Fardoust, head of the Special Information and Inspection Bureau, says: "Corruption in the royal system was so rampant that we realized, if we were to investigate all of them, we would need ten thousand employees. Therefore, we decided to only investigate those exceeding one hundred million tomans, and even with this, from 1971 to 1977, 3,750 major corruption cases exceeding one hundred million tomans were filed. All these cases were archived under the oral instructions of the prime minister to the minister of justice, and the Shah did not care." It is worth mentioning that one hundred million tomans in 1977 was equivalent to at least one thousand billion tomans in today's value. Thus, 3,750 cases of grand corruption, amounting to over a thousand billion tomans, were archived.

In addition to the theft of revenues by Mohammad Reza and his family, a large portion of Iran's oil revenues was spent on the lavish lifestyle of the Pahlavi family. One example of this is the 2,500-year celebration of the Persian Empire held in the fall of 1971, attended by officials from 69 countries, which cost between 650 to 800 million dollars.

The Shah and his associates spent immense amounts of money on purchasing homes and villas in various countries, including Switzerland, Italy,

England, and the United States. One of the most famous properties was the Rose Garden Palace in Switzerland, worth 10 million francs.

In addition to the palaces and gardens directly registered in the name of Mohammad Reza Shah and his family, the Shah also purchased numerous properties abroad at the expense of the Iranian people, including the most expensive house and park near London, the “Still Mansions” estate, where Queen Elizabeth II was born. He also owned the most expensive garden and building in Naples, Italy. The Shah owned a large garden and villa on the island of Capri, and a grand palace in St. Moritz, Switzerland, where he spent his winters. St. Moritz became known among foreign diplomats as "Iran's winter capital."

In 1971, Mohammad Reza purchased an island in Spain for 700 million dollars, and according to a report from the Daily Express on March 28, 1978, he also bought a large property in the Rocky Mountains of the United States for one million pounds. The wealth and assets of the Shah abroad were so immense that his sister, Ashraf, lost 15 million francs in a casino in Cannes during one night of the Nowruz holidays in 1974. Meanwhile, one of Ashraf’s properties, a luxurious palace at 29 Beekman Street in New York, was valued at 49 million dollars, making it one of the most expensive houses in the oldest neighborhoods of Manhattan.

Looting Under the Pahlavi Foundation

The properties and wealth looted from the national treasury by the Pahlavi family—whether by Reza Shah, Mohammad Reza Shah, their siblings, or relatives—represent an extensive and lengthy list. In 1958, Mohammad Reza Shah established the "Pahlavi Foundation" (with its headquarters located on 52nd Street in New York City, whose book value in 1975 was reported to be $14.5 million). He transferred a portion of his assets, including hotels, shares in factories, companies, and banks, to this foundation. The foundation replaced the "Pahlavi Estates Organization," and in October 1961, under the guise of legitimizing his assets, the Shah issued a decree to dedicate the foundation's assets to charitable activities. However, the majority of the board of trustees consisted of the Shah himself and members of the royal court. Moreover, substantial sums from oil revenues were allocated to the Pahlavi Foundation in the form of bank credits. Consequently, the Pahlavi family not only retained their previous assets (those inherited from Reza Shah) but also added revenues from oil and other sources.

The Pahlavi family, in addition to misappropriating gifts and international loans directed to this foundation, caused severe disruptions to the country's economic system by owning 207 economic enterprises, including construction, mining, agriculture, insurance companies, banks, hotels, casinos, cabarets, and centers of corruption. These assets encompassed banks, investment companies, insurance firms, hotels, tourist and recreational complexes, factories, and production companies located across the country and internationally. In just one example, the Shah's shares in international projects generated substantial income, with some reports estimating profits of $6,000 per minute and annual net profits exceeding $3 billion from his global investments.

Looting of Assets by the Pahlavi Family

Ahmad Ali Massoud Ansari, a close associate of Mohammad Reza Shah before and after the regime's collapse, stated:

"The vast landholdings of the Pahlavi family in Spain, valued in the billions, cannot be ignored. Additionally, part of the jewelry removed from Iran by the Pahlavi family, as I have heard, was stored in four large chests deposited in Swiss banks by Ms. Farideh Diba and Mr. Shahbazi."

Gholamreza Pahlavi, the Shah's brother, held significant shares and properties, including:50% of Azmayesh Factories,Majority shares in Karaj Spinning and Weaving Company,Major shareholder in Saveh Rolling and Profile Factories (with Manijeh Pahlavi as the principal stakeholder),

Shares in Tamishan Company (where Gholamreza was a stakeholder), Complete ownership of Industrial Homes International (with Gholamreza and Manijeh as sole shareholders),40% of shares in Tamishan Agro-Industry,

Complete ownership of Parsi Shahr Agricultural Company, Major shares in Agro-Industry and Sabz Dasht Agricultural and Development Company,

Major shares in SIAK Production Company, Complete ownership of the Daryakenar Sports Club (jointly with the Pahlavi Foundation), Shares in Overseas Investors' Services Company, Investments of approximately $500,000 in Chase Manhattan Bank, 12.5% of shares in the privately-held Kala Electric Company, and others. Abdolreza Pahlavi, another brother of the Shah, owned extensive lands, particularly in Mazandaran and Sari, amounting to approximately 3,700 hectares. He was also a shareholder in the Aluminum Rolling Group and John Deere Agricultural Machinery Company and the owner of Iran Hunting Company.

Ashraf Pahlavi, the Shah's sister, was among the most notorious figures of her time, engaged in widespread moral and economic corruption. Many landowners, aware of Ashraf’s influence within the royal court, transferred land to her to gain favor or benefit from various forms of preferential treatment. For instance, in Aryashahr, a landowner transferred 259 plots of land, each ranging from 600 to 700 square meters, to Ashraf.

Assets and Properties Taken Out of the Country by the Deposed Shah and His Associates

The aforementioned assets represent only a portion of the properties owned by the Pahlavi family during their over 50 years of rule in Iran. Following the fall of the monarchy and the departure of Mohammad Reza Shah on January 16, 1979, substantial amounts of wealth and assets were taken out of the country by the Shah, his wife, their relatives, and their military and political allies.

Documents in Iran indicate that part of Mohammad Reza Shah's properties, including 220 hectares of land, was sold before his departure in 1979 and converted into foreign currency, which was subsequently smuggled out of the country. According to American media reports, the Shah's wealth was tied to a complex network of companies, foundations, bank accounts, and real estate, including properties in Costa del Sol, Spain, a villa in St. Moritz, Switzerland (later purchased by Silvio Berlusconi), and various holdings worldwide. The Shah had planned for his wealth to be distributed as follows:

20% to Farah Diba,

20% to his eldest son, Reza,

15% to Farahnaz,

15% to Leila,

20% to his other son, Alireza,

8% to his daughter, Shahnaz, and

2% to his granddaughter, Mahnaz Zahedi.

Estimates of the Shah's divided wealth range from $120 million, as claimed by some relatives, to $100 billion, based on semi-official assessments. Abbas Milani, a historian close to the family, estimated the figure to be closer to $1 billion, yet the total amount of Iran’s wealth looted by the Pahlavi family remains uncertain.

Regarding national assets smuggled abroad by the Shah and his family, particularly in the final months of the regime, Ardeshir Zahedi, a confidant of the royal court, stated:

"The Tehran prosecutor’s office, during the administration of Sharif Emami, compiled a detailed list of individuals who had transferred funds abroad. Among the names was His Majesty, who was accused of smuggling $31 billion out of the country."

Zahedi, who was the regime’s foreign minister, Iran's final ambassador to the U.S., and the Shah’s son-in-law, remained with Mohammad Reza Shah during his illness and exile, working tirelessly to secure his residency in the United States. Based on existing documents, amidst the revolution and widespread strikes in many sectors, Central Bank employees published a list on December 6, 1978, detailing individuals who had transferred foreign currency abroad during September and October of that year. This list revealed that government officials had smuggled approximately $13 billion in wealth.

While Farah Pahlavi and her children claimed that the Shah’s assets amounted to only $60 million, reports indicate that government officials alone smuggled $13 billion in foreign currency during two months. Furthermore, the Shah and his associates transported 384 large suitcases filled with gold, royal jewels, and other wealth, much of which had already

been converted to foreign currency, bringing the total well beyond this figure.

The Central Bank list included the names of 178 government officials. Aggregating various reports regarding the assets looted by the Pahlavi family, the total value is estimated to have reached $100 billion.

Following the Islamic Revolution: The Central Bank of Iran released a list of 177 prominent figures of the Pahlavi regime, who collectively smuggled approximately $2 billion out of the country. Some of the most notable individuals and amounts include:

Jafar Sharif-Emami: approximately $31 million,

Gholam Ali Oveissi: $15 million,

Namazi: $9 million,

Nasser Moghadam: $2 million,

The Mayor of Tehran at the time: $6 million,

The Minister of Health at the time: $7 million,

The Director of the National Iranian Oil Company: over $60 million.

Plundering of Iranian Assets by the Pahlavi Family as Reported by Foreign Media

The Financial Times reported that Mohammad Reza Pahlavi, the deposed Shah of Iran, smuggled $35 billion out of the country. This figure appears to reflect only the direct transfer of funds abroad, excluding properties and shares owned by the Pahlavi family overseas.

The Daily Telegraph (UK), in a report published on January 18, 2023, explicitly stated:

"The Shah loaded so much gold and portable valuables onto the aircraft that the plane was unable to take off."

In a 2009 report on the wealth smuggled by deposed dictators worldwide, the Financial Times estimated that Mohammad Reza Pahlavi smuggled $35 billion in assets from Iran, of which $20 billion was frozen by the U.S. government. This assessment was corroborated by a report from the French association, CCFD.

The Christian Science Monitor, another Western media outlet, in an article examining part of the list of assets removed from Iran by the Shah, estimated the Shah's probable wealth to range from millions to billions of dollars. It wrote: “Mr. Paul O’Dwyer, who has been chosen by Iran as an attorney to recover the stolen assets, believes that if everything is in place, it will take at least five years to assess the extent of the deposed Shah’s assets. This is because many believe that the Shah and his family have stored the funds and assets removed in confidential accounts.”

The Washington Post, in a report published a day after the Shah fled Iran, wrote: “As Mohammad Reza Pahlavi, his wife, companions, aides, and bodyguards left Iran today for an uncertain future, at least one thing was certain: wherever they go, the Shah and his family will not be short on cash. Over the 53 years of Pahlavi’s reign, the royal family amassed a vast

fortune estimated to reach billions of dollars.”

The New York Times, on January 10, 1979, citing global banking sources, wrote: “Between two to four billion dollars were transferred by Iran’s royal family to the United States during just the last two years (1356 and 1357 of the Iranian calendar).”

The Washington Post, regarding the list of wealthy royal relatives who had left Iran, referenced over 63 princes and princesses who sought refuge in locations ranging from the Seychelles Islands to Brazil, all of whom had moved significant portions of their wealth out of Iran.

Dear People of Islamic Iran,

The Islamic Revolution of 1979 dealt a significant and painful blow to the US government, one that has not only remained unhealed but has deepened and intensified over time. Indeed, this revolution marked a civilizational uprising by the Iranian nation and the beginning of Muslim awakening to break free from centuries of domination. This provided the strongest motivation for America’s increasing enmity toward Iran and Iranians. Cutting off American influence in Iran and the expulsion of over 60,000 American and Western advisors—who were responsible for looting the wealth, oil, and valuable resources of Iran while maintaining political and governmental dominance—was a severe blow that the Americans received.

The occurrence of Iran’s second revolution, with the seizure of the U.S. spy den, marked the end of diplomatic relations between the two nations and the beginning of America’s hostilities against Iran. The Americans, having lost their key regional base and faced with the complete loss of any presence in Iran following the embassy takeover and the loss of hope for its retrieval, found themselves confronting a nascent power that had taken 52 of their agents captive. With the Algerian government acting as an intermediary and aiming to restore its tarnished image, the United States agreed to the terms of the Algiers Accords, leading to the release of its citizens in exchange for several commitments.

According to the provisions of the Algiers Accords, Iran was to release the 52 American hostages, and in return, the United States was to refrain from interfering in Iran’s internal (political and military) affairs, lift economic and trade sanctions, and release Iran’s frozen assets. Furthermore, in the realm of economic relations between the two countries, it was agreed that Iran would pay its debts to American entities. Conversely, the United States committed to pursuing the Pahlavi family and recovering the looted assets of the Iranian nation, utilizing its judicial and governmental mechanisms.

Iran promptly fulfilled its commitments, and one day after the issuance of the statements, the American hostages were released and transported back to the United States. However, the U.S. failed to operationalize and implement its obligations under the Algiers Accords. Even the fundamental principles of the agreements, such as the "commitment to non-interference in Iran’s affairs," were violated repeatedly, continuing to this day. Beyond these, the trade sanctions, which were lifted under the terms of the Accords, were reinstated during the imposed war and even intensified. Today, we are

witnessing the harshest sanctions in history imposed by the United States against the Iranian nation and government.

Honorable People of Iran,

The Hakeem Legal Group, comprising Iranian legal scholars and attorneys from across the country, has registered a lawsuit on behalf of the people of Iran against the government of the United States of America for supporting the Pahlavi family and its associates in looting the country’s assets, as well as for breaching contractual commitments under the Algiers Accords. This lawsuit, filed in the Special International Affairs Branch No. 55, seeks to claim the material and moral rights violated, demand compensation for the economic, energy, political, security, military, cultural, and other damages, and impose punitive measures.

As the representative of the plaintiffs and their attorneys, I declare at the unveiling ceremony of this lawsuit: the defendants in this case (the United States government, its officials, agents, governmental institutions, as well as the Pahlavi family, its heirs, and associates) participated and collaborated during the final years of the Pahlavi regime and upon their departure from Iran in the early days of the Islamic Revolution, in removing billions of dollars in Iranian national and public assets and investing them in the U.S. and European countries.

Intelligence reports and available documents show that the United States, by fully supporting the Pahlavi family, government associates, and royal military commanders, and by providing political and diplomatic protection—such as granting citizenship, residency, and civil rights to the plunderers of Iran’s wealth—prevented them from being held accountable to the Iranian people and the country. By creating legal, commercial, and economic infrastructures for their investments in the U.S. and European countries with looted assets, the U.S. is considered an accomplice in their crimes and bears legal responsibility toward the Iranian nation and government.

On the other hand, based on the commitments undertaken in the Algiers Accords, the United States pledged that in exchange for the release of the hostages, it would use its legal and judicial mechanisms to register and seize the looted assets of Iran and return them to the country. This obligation was never fulfilled and constituted a breach of its commitments (as per the provisions of Articles 4 to 9 of the Algiers Accords).

Dear People of Islamic Iran,

The Hakeem Legal Group, prioritizing the nation’s demands and based on the following domestic and international laws, has initiated a legal claim in the Special International Affairs Branch No. 55:

1. Domestic Laws

a. The Law on the Jurisdiction of Iranian Judiciary for Civil Claims Against Foreign States (2011)

b. Executive Regulations of the Law on Jurisdiction of Iranian Judiciary for Civil Claims Against Foreign States (1999)

c. The Law Obligating the Government to Pursue Compensation for U.S. Actions and Crimes Against Iran and Iranian Nationals (2016)

d. The Law on Proportional and Reciprocal Measures by the Islamic Republic of Iran Against America (2015)

e. The Law on Countering Human Rights Violations and Adventurous and Terrorist Actions of America in the Region (2017)

f. The Civil Liability Law (1928)

2. International Laws

a. The Charter of the United Nations

b. The 2001 Draft Articles on the Responsibility of States for Internationally Wrongful Acts

c. The 1948 Universal Declaration of Human Rights and the International Covenants on Civil and Political Rights, and Economic, Social, and Cultural Rights

3. The Algiers Accords

The Algiers Accords serve as the most fundamental and principal agreement between Iran and the United States, providing the framework for the restitution and resolution of Iranian blocked and looted assets by the Pahlavi family. Despite Iran fulfilling all its obligations under these Accords, the U.S. has evaded many of its commitments and committed violations. Consequently, under important international documents, including the Draft Articles on State Responsibility, the U.S. has committed internationally wrongful acts and must compensate for the damages.

4. Relevant International Conventions on Looted Assets

The United Nations Convention Against Corruption (UNCAC), adopted on October 31, 2003, consisting of seventy-one articles, states in its preamble: "Member States, determined to prevent, detect, and effectively prohibit the international transfer of illicitly acquired assets and to strengthen international cooperation for their restitution, shall take appropriate measures..."

Based on the aforementioned documents and previous evidence derived from the actions and activities of the United States in breaching its obligations under the Algiers Accords and significant international conventions, particularly concerning the plundering of Iran’s assets and properties by the Pahlavi dynasty and the failure of the United States to cooperate in the restitution of assets looted by the Pahlavi family and their close associates residing in the United States (in violation of U.S. obligations under the Algiers Accords and the United Nations Convention against Corruption), the United States government bears international legal responsibility towards the government and people of Iran and must be held jointly liable alongside the Pahlavi family and their associates.

Therefore, given the jurisdiction of the General and Civil Court of Tehran Province, as per domestic laws, including the Law on the Jurisdiction of Courts of the Islamic Republic of Iran to Hear Civil Claims against Foreign States (2011), and based on international laws and regulations, including peremptory norms and customary rules of international law, principles of law such as the principle of non-intervention, the United Nations Convention against Corruption, and other applicable legal frameworks, and upon proving their violation by the American defendants as extensively detailed in the submitted petition:

It is evident that the detested Pahlavi dynasty, its statesmen, related institutions, and close associates have caused extensive material and moral damages to the nation and state of Iran. Thus, by establishing the liability of the United States government and its official and unofficial representatives to compensate for all such material and moral damages, and in pursuit of partially securing the rights and remedies owed to the plaintiffs (the people of Iran), through the submission of a public petition, we hereby request the competent judicial authority to issue a judgment for:

1. The joint and several liability of the defendants (the United States government, the Pahlavi family, their close associates, and others) to compensate for the material and moral damages inflicted on the plaintiffs due to their illegal actions as described in the petition;

2. Payment of litigation costs, including court fees and attorneys’ fees; and

3. The imposition of deterrent punitive measures.

Respectfully,

Hakeem Legal Group

16 January 2025