

[PROVISIONAL TRANSLATION FROM PERSIAN]

[Translator's notes appear in square brackets]

[Personal information has been **redacted**.]

File Number: ----

In the Name of God

[Emblem]

The Judiciary

Court of Administrative Justice

Request

Submitted to Branch ----

Signature of Chief Justice ----

Registration Number and Date ----

Particulars: Plaintiff

Full Name: Yasaman Haghghat Mehlabani

Father's Name: Ramin

Occupation: Expelled student

Address: [**Redacted**]

Plaintiff's Legal Representative:

Respondent: Imam Khomeini International University in Qazvin

Subject of grievance and claim: Reinstatement to the university as described in the text below

Explanation, Evidence, and Supporting Documents: ----

Respected Head of the Court of Administrative Justice

Respectfully submitting to your attention that, according to the evidence—copies of which are herewith attached for your perusal—I, Yasaman Haghghat Mehlabani participated in the 1390-91 [2011/12] National University Entrance Examination and was accepted at Imam Khomeini International University in Qazvin in the field of physics as a day student. Subsequent to enrolment, I started classes at the beginning of the term, and, like other students, engaged in my studies, until on 29 Mehr 1391 [20 October 2012] when the [Ministry of] Intelligence authorities, in collaboration with

the head of Hirasat¹, summoned me to the Hirasat office located at the said university and told me that, because of being a Baha'i, I was banned from participating in classes, thus expelling me from university. Of course, this [decision] was communicated to me verbally, and the authorities refused to give me anything in writing to this effect, disregarding my objection [and request for documentation], and thus denying me the right to higher education. This action by the university is contrary to the law on every level and a clear violation of my human rights, i.e., violation of paragraphs 3, 4, 9, and 14 of Article 3, as well as the provisions of Article 30, of the Constitution, and against Article 23 of the same law with respect to investigation of an individual's belief; Article 14, which binds [Muslims] to respect the human rights of non-Muslims; and Articles 19 and 20, by which everyone's rights are protected under the law. Furthermore, with respect to the right to education as per Articles 26 and 27 of the Universal Declaration of Human Rights, Article 13 of the International Convention on Social, Economic and Cultural Rights, and the equal protection of all by law as per Article 26 of the International Convention on Civil and Political Rights, to which the government of Iran is a signatory, and according to Article 9 of the Civil Code, which makes such laws binding and indispensable, as the respected judges of the Court of Administrative Justice are well aware, the right to progress and advancement, also endorsed by the United Nations, is held high in Islam, which emphasises fostering education and knowledge. How is it then that the state's executive authorities deny such a divine principle and prevent an individual from accessing such a fundamental right through discrimination, while any form of discrimination, as per paragraph 9 of Article 3, is prohibited. Moreover, any expulsion must be through the order of legal authorities; in this case, it was not.

Therefore, given that the action taken by Imam Khomeini International University was against the Sharia and codified laws, and a clear violation of my human rights, I hereby categorically object to it and respectfully request the esteemed judges of the Court of Administrative Justice to lift the ban against my participation in classes and issue an order to revoke the decision and action of the noted educational institution.

Documentation:

A copy of the student card

A copy of the syllabus and examination schedule

Facsimile of the letter sent to the president of the university, and related references

Signature

¹ [Security Office: Hirasat: An intelligence service that has an office in every university and governmental organization in Iran]