BRIEFING NOTE

Doe I v. Sabeti: U.S. Court Rules Iranian Torture Survivors' Case Can Move Forward

Summary

On October 6, 2026, a U.S. federal court in Florida ruled that the lawsuit filed by three Iranian torture survivors against Parviz Sabeti, a former senior official in SAVAK—the Shah-era Iranian intelligence agency—can continue. Sabeti had argued that the plaintiffs waited too long to bring their case. The court rejected that argument. It decided that the plaintiffs brought their case on time because they could not have safely come forward sooner and that the defendant's concealing himself, independent of the plaintiffs' fear of retaliation, was enough on its own to extend their deadline to sue. The case will now move forward to examine the plaintiffs' claims of torture.

About the Case

In February 2025, three survivors of torture filed a case against Sabeti in a U.S. court. To protect their safety, they are not using their real names and are known as John Doe I, II, and III. They allege that in the 1970s they were detained and tortured under a system of political repression designed and overseen by Sabeti. At the time, they allege, Sabeti was Deputy Director of SAVAK, the Shah's intelligence service. He also allegedly headed SAVAK's internal security division and the *Komiteh Moshtarak* (the Joint Anti-Sabotage Committee).

The survivors brought their case under a U.S. law called the Torture Victim Protection Act. This law allows survivors of torture committed in another country to seek justice in U.S. courts. The law normally requires survivors to file within ten years, but that time can be extended when survivors face extraordinary obstacles, such as danger to their lives. Sabeti argued that the plaintiffs had missed this deadline. This ruling decides only that the case was brought in time. The court has not yet decided whether Sabeti is responsible for torture. That will be decided in the next stage of the case.

What the Court Found

1. **Repression in Iran never ended.** In other countries, survivors have been able to seek justice once dictatorships fell and democratic governments took over. The court found that this has never happened in Iran. The court found: "two, overlapping authoritarian regimes have remained in power in Iran since [the survivors] were tortured approximately fifty years ago," and Iran "has never engaged in a democratic reckoning" with the crimes Sabeti is accused of.
2. **The Shah's government and the Islamic Republic form one continuous chain of repression.** The court found that the survivors were "persecuted and denied justice by both regimes." The court also found that the Islamic Republic built on SAVAK's record of repression and has "almost certainly exceeded it."
3. **SAVAK did not disappear after the revolution: it was transformed into SAVAMA.** The court pointed to strong evidence that the Islamic Republic took over SAVAK and turned it into its own intelligence agency, SAVAMA, with a similar structure and some of the same staff. Although some scholars have called the movement that ended the Shah's rule a "revolution against torture," the Islamic Republic began using SAVAK's tools of repression for its own purposes "immediately." As the court explained, "to the Iranian people, at least, SAVAMA quickly assumed SAVAK's reputation and remit, deploying similar tactics in its unrelenting persecution of internal dissent."
4. **The court's ruling recounts the history of SAVAK's abuses.** Relying on the report of an expert historian, the ruling describes *Komiteh Moshtarak* as having a notorious reputation as "a den of torture and brutality." The court ruling states that "activists, intellectuals, artists, and other dissidents were imprisoned, abused, and tortured by SAVAK and the [Joint Anti-Sabotage] Committee during the early 1970s," and that there was no way to challenge SAVAK torture in the Shah's courts.
5. **The plaintiffs' fear of reprisal was legitimate, and it continues today.** The court found that the plaintiffs have had good reason to fear for their safety from the Islamic Republic, which has a record of targeting critics abroad; from Sabeti himself; and from Sabeti's supporters and other hostile elements within the diaspora. As the court put it, the plaintiffs "have faced continuous threats to their safety whenever and wherever they have attempted to pursue their rights—starting under the Shah, then [the Islamic Republic], and continuing through the present." Because the danger has never ended, the court decided the plaintiffs filed their case on time.
6. **The survivors did everything that could be expected of them.** Sabeti argued that the plaintiffs should have searched for him earlier. The court disagreed. It recognized that the survivors came to the United States as

refugees and "still do not feel safe here." The survivors learned in 2023 that Sabeti was living in the United States, and they filed their case less than two years later. "Plaintiffs—now in their 70s and 80s—determined this might be their only chance to seek justice for their claims and so resolved to accept the lethal risks that have accompanied their decision to file this lawsuit," the court found.

7. **Sabeti took steps to conceal himself, such that the survivors did not know where he was until 2023.** The court found that this was a separate reason for the court to extend the deadline for filing the suit.

The Survivors' Reasons for Coming Forward Now

The court's ruling includes the plaintiffs' own testimony about why they came forward:

> *"People of Iran should know this—should know what happened to [my] generation, and this is part of our history."* **— John Doe I**
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> *"It's not for me myself—it's because of your children… [Filing this lawsuit] [is] for my family, my neighbors, my fellow citizen."* **— John Doe I**
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> *"…this represent[s] a lifetime opportunity for me to…establish that human rights is a concept above everything else."* **— John Doe III**
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> *Describing his fear of pursuing Sabeti: "…when [a] deer save[s] itself from [the] mouth of [a] wolf, it doesn't go back to look for the wolf."* **— John Doe II**

Why This Matters for Human Rights in Iran

- **Justice across all eras.** The ruling recognizes that survivors of torture under the Shah could not seek justice for five decades because repression in Iran never stopped. Torture is a crime, whether committed under the Shah or the Islamic Republic, and accountability cannot be selective.
- **Preserving the truth and the historical record.** For decades, those who suffered under SAVAK have not received recognition. A U.S. court ruling now sets out a written account of SAVAK's abuses, at a time when there have been efforts to whitewash that history.
- **A path to justice outside Iran.** Survivors cannot currently seek justice inside Iran. As the court recalled, because Sabeti is in the U.S., U.S. courts can ensure that "some of the most egregious cases of human rights violations" do not go unheard.
- **Hope for survivors today.** Iranians inside the country and abroad are asking how to come to terms with decades of state violence. This case shows that people responsible for torture should not escape justice because time has passed or because of which government they served. For survivors of abuses committed in Iran today, it is a sign that justice is possible.

What Happens Next

- **Gathering evidence.** The case now moves to the stage where both sides collect and share evidence about the plaintiffs' allegations of torture, including documents and testimony from witnesses, to prepare for trial. The plaintiffs will need to prove their claims, and Sabeti will have the chance to respond.
- **Protecting the survivors.** The plaintiffs' names remain private. Their identities will be shared with Sabeti only under strict rules set by the court. The court warned that it will take any breach of these rules very seriously.
- **Setting a schedule.** The parties have submitted a proposed schedule to the court, which will guide the timeline for gathering evidence and for trial.

Learn more: Read the decision: here | Case page and FAQ: cja.org/what-we-do/litigation/doe-i-v-sabeti | Media contact: Ela Matthews (ematthews@cja.org) | The plaintiffs are represented pro bono by Foley Hoag LLP and CJA.