



June 20, 2025

**VIA EMAIL**

H.E. Carolyn Rodrigues-Birkett  
Ambassador  
Permanent Representative of Guyana  
to the United Nations  
801 Second Avenue, 5th Floor  
New York, NY 10017

*RE: Law of Armed Conflict Violations by Iran against Israel*

Your Excellency:

By way of introduction, the European Centre for Law and Justice (ECLJ) is a non-profit organization located in Strasbourg, France, dedicated to protecting human rights and religious freedom in Europe and around the world. The ECLJ also holds Special Consultative Status with the United Nations ECOSOC.

The ECLJ submits this letter urging the United Nations Security Council to hold Iran accountable for its blatant violation of the Law of Armed Conflict (LOAC), by referring the situation to the International Criminal Court, pursuant to the Security Council's authority under Chapter VII of the United Nations Charter and as delineated in Article 13(b) of the Rome Statute.<sup>1</sup>

The Islamic Republic of June 19, 2025, ballistic missile attack targeted the Soroka Medical Center. Iran's attack was unfortunately successful, causing extensive damage, injuring over 70 people, and forcing mass patient evacuations. This calculated attack on a clearly protected civilian medical facility, with no proximate military objectives, constitutes a flagrant violation of the Geneva Conventions' principle of distinction, which requires parties to armed conflict to distinguish between civilian and military targets. This violation of the rules of international law cannot be tolerated, and immediate action must be taken by the United Nations Security Council to hold Iran accountable for this war crime.

**STATEMENT OF FACTS**

On Thursday, June 19, 2025, Iran launched a deliberate missile barrage targeting multiple civilian locations in Israel, with 30 ballistic missiles fired in an early-morning attack that

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<sup>1</sup> Rome Statute of the International Criminal Court, art. 13(b), 2187 U.N.T.S. 38544 (July 17, 1998), <https://www.icc-cpi.int/sites/default/files/RS-Eng.pdf>.

resulted in a direct hit on Soroka Medical Center in Beersheba, southern Israel's largest and primary hospital serving the region.<sup>2</sup>

Extensive damage was reported across the hospital, and one doctor who was present reported that "[t]here was a massive boom and blast wave."<sup>3</sup> The top floor of a hospital building was completely destroyed, and damage and destruction occurred throughout the Soroka Medical Center.<sup>4</sup>

The extensive structural damage resulted in more than 70 people sustaining injuries directly from the missile strike.<sup>5</sup> Hospital staff and patients were forced into emergency shelters, and a fire outbreak required extensive rescue operations.<sup>6</sup> Rescue and medical teams had to scour the site to transfer patients to other facilities, severely compromising medical care for the region's population during an active conflict.<sup>7</sup>

Without question, the hospital attack was part of a systematic targeting of civilian infrastructure, including direct strikes on residential buildings near Tel Aviv, resulting in at least 240 total civilian casualties.<sup>8</sup> Additional casualties occurred in central Israeli cities, where 6 people were seriously injured in Ramat Gan and Holon due to Iranian missiles that exploded in residential areas.<sup>9</sup>

Soroka Medical Center has been closed and shut down except for life-saving emergencies.<sup>10</sup> The hospital has over 1,000 beds and provides services to the approximately 1 million residents of Israel's south, as one of the most significant hospitals in that area.<sup>11</sup> Accordingly, its closing will have significant effects on the many residents of the area and cause severe continuing harm.

Iran has claimed that the ballistic missile that hit Soroka was targeting an adjacent military intelligence facility, but there are no Israeli military facilities that are adjacent or in the vicinity

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<sup>2</sup> Emanuel Fabian, et. al, *Heavy Damage, Injuries as Iranian Missile Hits Beersheba Hospital; Dozens Hurt in Central Cities*, TIMES OF ISRAEL (June 19, 2025), <https://www.timesofisrael.com/heavy-damage-injuries-as-iranian-missile-hits-beersheba-hospital-dozens-hurt-in-central-cities/>.

<sup>3</sup> Natan Odenheimer, "There Was a Massive Boom": Doctor Recounts Iranian Strike on Hospital, NEW YORK TIMES (June 19, 2025), <https://www.nytimes.com/2025/06/19/world/middleeast/israel-soroka-hospital-hit-iranian-strike.html>.

<sup>4</sup> *Id.*

<sup>5</sup> Sam Mednick, et. al., *Iranian Missiles Hit a Hospital and Wound over 200. Israel Threatens Iran's top leader*, ASSOCIATED PRESS (June 19, 2025), <https://apnews.com/article/israel-iran-attacks-nuclear-news-06-19-2025-b508817b78ed8d2f6067c1516215cf94>.

<sup>6</sup> *Id.*

<sup>7</sup> *Id.*

<sup>8</sup> Sam Mednick, et. al., *Iranian Missiles Hit a Hospital and Wound over 200. Israel Threatens Iran's top leader*, ASSOCIATED PRESS (June 19, 2025), <https://apnews.com/article/israel-iran-attacks-nuclear-news-06-19-2025-b508817b78ed8d2f6067c1516215cf94>.

<sup>9</sup> Emanuel Fabian, et. al, *Heavy Damage, Injuries as Iranian Missile Hits Beersheba Hospital; Dozens Hurt in Central Cities*, TIMES OF ISRAEL (June 19, 2025), <https://www.timesofisrael.com/heavy-damage-injuries-as-iranian-missile-hits-beersheba-hospital-dozens-hurt-in-central-cities/>.

<sup>10</sup> *Soroka Chief: Widespread Damage to Hospital; All Patients and Staff Were in Shelters*, TIMES OF ISRAEL (June 19, 2025), [https://www.timesofisrael.com/liveblog\\_entry/soroka-chief-widespread-damage-to-hospital-all-patients-and-staff-were-in-shelters/](https://www.timesofisrael.com/liveblog_entry/soroka-chief-widespread-damage-to-hospital-all-patients-and-staff-were-in-shelters/).

<sup>11</sup> Emanuel Fabian, et. al, *Heavy Damage, Injuries as Iranian Missile Hits Beersheba Hospital; Dozens Hurt in Central Cities*, TIMES OF ISRAEL (June 19, 2025), <https://www.timesofisrael.com/heavy-damage-injuries-as-iranian-missile-hits-beersheba-hospital-dozens-hurt-in-central-cities/>.

of the hospital.<sup>12</sup> The IDF's Southern Command base is located over two kilometers away — well beyond any reasonable margin of targeting error for precision-guided ballistic missiles.<sup>13</sup> Even if there was a military base nearby, Iran still had a legal obligation to warn civilians and give them enough time to evacuate the protected facility, the hospital. The failure to do so further indicates that Iran intentionally targeted the hospital.

## STATEMENT OF LAW

Both Israel and Iran are parties to all four Geneva Conventions of 1949, and Iran is a signatory to Additional Protocol I. These instruments establish binding obligations regarding the protection of civilian medical facilities during armed conflict. Additionally, most principles laid out in the Geneva Conventions, including the protection of medical facilities, have achieved the status of customary international law.

The LOAC imposes a complex equation for assessing the legality of any attack anticipated to cause harm to civilians.<sup>14</sup> According to this equation, it is axiomatic that military objectives are lawful targets and that civilians are unlawful targets.<sup>15</sup> The principle of distinction establishes this axiom.<sup>16</sup> That principle, which is at the core of the regulation of methods and means of warfare, requires that belligerents at all times distinguish between the lawful objects of attack and all other persons, places, and things that do not qualify as lawful targets.<sup>17</sup> The LOAC imposes an obligation on belligerents to take “constant care . . . to spare the civilian population, civilians and civilian objects.”<sup>18</sup>

Article 48 of the Additional Protocol I to the Geneva Conventions sets forth the following basic rule of distinction: “[i]n order to ensure respect for and protection of the civilian population and civilian objects, the Parties to the conflict shall at all times distinguish between the civilian population and combatants and between civilian objects and military objectives and accordingly shall direct their operations only against military objectives.”<sup>19</sup> This rule requires that a distinction must be made between civilians and those directly participating in hostilities. Iran's deliberate targeting of Soroka Medical Center, a clearly civilian medical facility with no military function, constitutes a direct violation of this core principle.

Further, Article 52 of the Additional Protocol I requires that “attacks shall be limited strictly to military objectives.”<sup>20</sup> Military objectives are defined as “those objects which by their nature, location, purpose or use make an *effective* contribution to military action and whose total or partial destruction, capture or neutralization, in the circumstances ruling at the time, offers a

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<sup>12</sup> *Id.*

<sup>13</sup> *Id.*

<sup>14</sup> Protocol Additional to the Geneva Conventions of 12 August 1949, and relating to the Protection of Victims of International Armed Conflicts art. 57(2), 8 June 1977, 1125 U.N.T.S. 3 [hereinafter “Protocol I”].

<sup>15</sup> *See id.* art. 57(1).

<sup>16</sup> *See id.*; *see also* U.N. Office for the Coordination of Humanitarian Affairs (OCHA), Integrated Reg'l Info. Network (IRIN), *Special Report: Civilian Protection in Armed Conflict*, at 1–2 (Apr. 1, 2003), <http://www.irinnews.org/IndepthMain.aspx?IndepthId=31&ReportId=70481> (outlining the major principles of international law, and describing the principle of distinction as “the most important [principle] . . . in relation to civilian protection”).

<sup>17</sup> *See* Protocol I, *supra* note 14.

<sup>18</sup> *Id.* art. 57(1).

<sup>19</sup> *Id.* art. 48.

<sup>20</sup> *Id.* art. 52.

*definite* military advantage.”<sup>21</sup> Soroka Medical Center clearly fails to meet this definition, being exclusively dedicated to civilian medical care.

Article 51 of the Additional Protocol I requires that “[t]he civilian population as such, as well as individual civilians, shall not be the object of attack. Acts or threats of violence the primary purpose of which is to spread terror among the civilian population are prohibited.”<sup>22</sup> States have an obligation to “take all *feasible* precautions to spare the civilian population,”<sup>23</sup> and to “remove civilian persons and objects . . . from the vicinity of military objectives.”<sup>24</sup> Moreover, “[a]ttacks against the civilian population or civilians by way of reprisals are prohibited.”<sup>25</sup> Iran's claim of targeting a nearby Israeli military facility is an outright lie. Its attack was targeted not against a military objective, but a civilian population. Regardless, even if that was the case (which it was not) Iran still had a legal obligation to warn civilians and give them enough time to evacuate the protected facility, (i.e., the hospital). The failure to do so further indicates that Iran intentionally targeted the hospital.

Moreover, the Geneva Conventions specifically protects medical personnel and hospitals. Under Article 12 of the Additional Protocol I, “Medical units shall be respected and protected at all times and shall not be the object of attack.”<sup>26</sup> Hospitals are also protected under the general protection of civilian objects under Article 52 of the Additional Protocol I and under Article 14 of the Geneva Convention IV. Article 12 is absolute unless medical facilities are being used for military purposes, which is demonstrably not the case here.

Belligerents bear a constant obligation to *endeavor* to mitigate risk of harm to civilians and civilian property.<sup>27</sup> There is no justification for the Islamic Republic of Iran's targeting of Soroka Medical Center. The evidence demonstrates that Iranian forces deliberately targeted a civilian hospital, a significant distance from any military target. That is a war crime under international law.

## CONCLUSION

Iran's calculated attack on Soroka Medical Center represents a flagrant violation of fundamental principles of LOAC designed to protect civilian medical infrastructure during armed conflict. This deliberate targeting of a hospital serving civilians—with no military justification—constitutes a war crime demanding immediate international accountability. The international legal framework established by the Geneva Conventions exists precisely to prevent such barbaric targeting of medical facilities and those seeking medical care. We urge you to take immediate action to hold Iran accountable for its conduct.

The international community's response to this attack will determine whether the vital protections for medical facilities during armed conflict retain their force or become meaningless in the face of deliberate violations. Swift and decisive action is essential to uphold the rule of law and protect civilian populations worldwide. The international community must respond with the full force of legal accountability, not only to deliver justice for this

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<sup>21</sup> *Id.*

<sup>22</sup> *Id.* art. 51(2).

<sup>23</sup> *Id.*

<sup>24</sup> *Id.* art. 58(a).

<sup>25</sup> *Id.* art. 51(6).

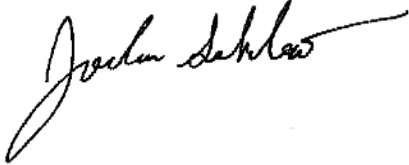
<sup>26</sup> *Id.* art. 12.

<sup>27</sup> *Id.* art. 57(1) (emphasis added).

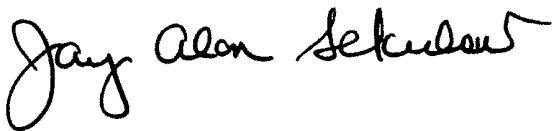
unconscionable act, but to send an unmistakable message that the deliberate targeting of medical facilities will meet swift, certain, and severe consequences. The protection of hospitals is not a mere technicality of international law—it is a cornerstone of our shared humanity that demands unwavering defense.

We, therefore, urge the Security Council to take effective measures against Iran for its violations of LOAC consistent with its mandate under Chapters VI and VII of the Charter, including specifically by referring the matter to the International Criminal Court to hold Iran accountable for these violations of LOAC.

Respectfully Submitted,

A handwritten signature in black ink, appearing to read "Jordan Sekulow". The signature is fluid and cursive, with a long horizontal stroke extending to the right.

Jordan Sekulow  
Chief Counsel  
European Centre for Law and Justice

A handwritten signature in black ink, appearing to read "Jay Sekulow". The signature is fluid and cursive, with a long horizontal stroke extending to the right.

Jay Sekulow  
Chief Counsel  
American Center for Law and Justice