

UNITED STATES DISTRICT COURT FOR THE DISTRICT OF COLUMBIA

Lee v. Islamic Republic of Iran

Lee · No. Case No. 19-cv-00830 (APM) · Decided May 6, 2026

SUMMARY

The United States District Court for the District of Columbia considers whether Iran is liable under the Foreign Sovereign Immunities Act for materially supporting 17 attacks against U.S. servicemembers and contractors in Iraq between 2004 and 2008. The court addresses service of process, default-judgment standards, expert testimony, Iran’s support for Hezbollah and Iraqi proxy groups, and the characteristics of explosively formed penetrators. Based on the evidence, the court finds Iran responsible for the attacks and liable for the plaintiffs’ injuries.

CASE DETAILS

COURT	United States District Court for the District of Columbia
WRITING FOR THE COURT	Amit P. Mehta
JURISDICTION	United States District Court for the District of Columbia
DECIDED	May 6, 2026
DOCKET	Case No. 19-cv-00830 (APM)
DISPOSITION	other
PROCEDURAL POSTURE	Plaintiffs sought default judgment against Iran under the Foreign Sovereign Immunities Act for injuries and deaths arising from 17 attacks in Iraq. The court independently determined subject-matter jurisdiction, personal jurisdiction, service, and liability, and granted default judgment as to the injured victims' and estates' claims while declining to make a final determination on immediate family members' claims absent evidence of U.S. nationality.
STANDARD OF REVIEW	Default judgment under the FSIA is discretionary and requires evidence satisfactory to the court; the court must independently satisfy itself that subject-matter and personal jurisdiction exist before entering default judgment.
PRECEDENTIAL VALUE	Published district-court memorandum opinion and order; persuasive but not binding precedent outside the case.
PARTIES	William Lee, et al. v. Islamic Republic of Iran

TOPICS

default judgment foreign sovereign immunity subject matter jurisdiction personal jurisdiction
service of process

PRACTICE AREAS

foreign sovereign immunity civil procedure torts remedies military law evidence

QUESTIONS PRESENTED

1. Whether the FSIA terrorism exception supplied subject-matter jurisdiction over claims arising from the 17 attacks.
2. Whether plaintiffs properly served Iran under 28 U.S.C. § 1608 and thereby established personal jurisdiction.
3. Whether Iran's provision of material support through its officials and agents proximately caused plaintiffs' injuries and deaths.
4. Whether plaintiffs established entitlement to relief under 28 U.S.C. § 1605A(c).
5. Whether immediate family-member plaintiffs established the U.S.-nationality requirement for recovery under § 1605A(c).

HOLDINGS

1. The court had subject-matter jurisdiction under the FSIA terrorism exception, 28 U.S.C. § 1605A(a)(1), because the claims sought money damages for personal injury or death caused by extrajudicial killings and Iran's material support for those killings, Iran was a designated state sponsor of terrorism, and the other statutory prerequisites were satisfied.
2. The killings in the 17 attacks constituted extrajudicial killings because they were completed, deliberated killings not authorized by a judgment of a regularly constituted court or lawfully carried out under the authority of a foreign nation.
3. The court had personal jurisdiction over Iran because subject-matter jurisdiction existed and plaintiffs properly served Iran through diplomatic channels under 28 U.S.C. § 1608(a)(4).
4. Iran was liable under 28 U.S.C. § 1605A(c) for the injuries and deaths of the surviving injured victims and deceased victims whose estates asserted claims.
5. The court did not make a final determination on the immediate family-member plaintiffs' § 1605A(c) claims because those plaintiffs had not offered allegations or evidence establishing that they were U.S. nationals.

KEY QUOTATIONS

“[T]he entry of a default judgment is not automatic and requires the exercise of sound discretion.” (2)

“[T]he FSIA leaves it to the court to determine precisely how much and what kinds of evidence the plaintiff must provide, requiring only that it be satisfactory to the court.” (2)

“In other words, under the FSIA, subject matter jurisdiction plus service of process equals jurisdiction.” (38)

“For the foregoing reasons, the court grants the motion for default judgment against Defendant as to the 17 attacks considered herein as to the injured victims’ and estates’ claims, but not the immediate family-member claims.” (43)

FACTUAL BACKGROUND

Between 2004 and 2008, U.S. servicemembers and civilian contractors in Iraq were killed, injured, abducted, or otherwise harmed in 17 attacks. Plaintiffs alleged and supported with expert and other evidence that Iranian officials and agents, including the IRGC and Qods Force, materially supported Iraqi proxy groups such as JAM Special Groups, including through funding, training, weapons, and explosives. The court found that Iran-sponsored militants carried out the attacks and that the attacks caused the injuries and deaths alleged by the injured victims and estates.

PROCEDURAL HISTORY

This case proceeded in phases. The court previously found Iran liable for four attacks in Lee I, 27 attacks in Lee II, and 13 attacks in Lee III. In this phase, the court considered evidence concerning 17 additional attacks, including incorporated prior findings, judicially noticed records from related proceedings, expert testimony, and attack-specific evidence. The court granted default judgment on the injured victims' and estates' claims and allowed plaintiffs 30 days to submit evidence establishing that family-member plaintiffs are U.S. nationals.

DISPOSITION

other

REMAND INSTRUCTIONS

No remand. Plaintiffs may, within 30 days, submit additional evidence establishing that a family-member plaintiff is a U.S. national.

CASES CITED

- Salzman v. Islamic Republic of Iran, 2019 WL 4673761 (D.D.C. Sept. 25, 2019)
- Jerez v. Republic of Cuba, 775 F.3d 419 (D.C. Cir. 2014)
- Han Kim v. Democratic People's Republic of Korea, 774 F.3d 1044 (D.C. Cir. 2014)
- Owens v. Republic of Sudan, 864 F.3d 751 (D.C. Cir. 2017)
- Karcher v. Islamic Republic of Iran, 396 F. Supp. 3d 12 (D.D.C. 2009)
- Karcher v. Islamic Republic of Iran, 2021 WL 133507 (D.D.C. Jan. 14, 2021)
- Fritz v. Islamic Republic of Iran, 320 F. Supp. 3d 48 (D.D.C. 2018)
- Rimkus v. Islamic Republic of Iran, 750 F. Supp. 2d 163 (D.D.C. 2010)
- Murphy v. Islamic Republic of Iran, 740 F. Supp. 2d 51 (D.D.C. 2010)
- Argentine Republic v. Amerada Hess Shipping Corp., 488 U.S. 428 (1989)

- Kilburn v. Socialist People's Libyan Arab Jamahiriya, 376 F.3d 1123 (D.C. Cir. 2004)
- Borochoy v. Islamic Republic of Iran, 94 F.4th 1053 (D.C. Cir. 2024)
- Boothe v. Islamic Republic of Iran, 2026 WL 809887 (D.D.C. Mar. 24, 2026)
- Martino v. Islamic Republic of Iran, 2024 WL 6824393 (D.D.C. Sept. 30, 2024)
- GSS Group v. National Port Authority, 680 F.3d 805 (D.C. Cir. 2012)
- Kaplan v. Central Bank of the Islamic Republic of Iran, 896 F.3d 501 (D.C. Cir. 2018)
- Rezaian v. Islamic Republic of Iran, 422 F. Supp. 3d 164 (D.D.C. 2019)
- Roth v. Islamic Republic of Iran, 78 F. Supp. 3d 379 (D.D.C. 2015)
- Allan v. Islamic Republic of Iran, 2019 WL 2185037 (D.D.C. May 21, 2019)
- Argonaut Insurance Co. v. Lynchburg Steel & Specialty Co., 308 F. Supp. 3d 218 (D.D.C. 2018)

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