A Comparative Study of the Crimes Leading to the Death Penalty in the Quran, Zoroastrian Legal Sources, and the Penal Code of the Islamic Republic of Iran

Fariba Sharifian

Assistant professor, The Research Institute of Cultural Heritage and Tourism (RICHT), Faculty of Iranian Linguistics, Inscriptions and Texts, Tehran, Iran. E-mail: sushansfar@gmail.com, (Corresponding Author).

Katayoun Fekripour

Assistant professor, The Research Institute of Cultural Heritage and Tourism (RICHT), Faculty of Iranian Linguistics, Inscriptions and Texts, Tehran, Iran. E-mail: katayoun.fekripour@gmail.com.

Azadeh Heidarpour

Assistant professor, The Research Institute of Cultural Heritage and Tourism (RICHT), Faculty of Iranian Linguistics, Inscriptions and Texts, Tehran, Iran. E-mail: azadeheidarpour@gmail.com.

Abstract

This paper aims to examine the death penalty in Zoroastrianism, the Quran, and the laws of the Islamic Republic of Iran. By studying antient Zoroastrian texts, we face a variety of crimes and punishments such as murder, robbery, adultery, magic, rape, and assault that were always considered to be the worst offenses. Zoroastrian religious scholars wrote books on crimes and their punishment in this world and the hereafter. Islam, like all other divine religions, regards the death penalty as a permissible and sometimes obligatory punishment for the perpetrators of capital offenses, while in other cases it prohibits the death penalty and considers it a grave sin. The Islamic penal system strives to confront offenses and injustice and eliminate corruption. This paper discusses the differences and similarities between the crimes that lead to the death penalty in pre-Islamic Iran, the Quran, and the laws of the Islamic Republic of Iran.

Keywords: crime, Quran, pre-Islamic Iran, capital punishment.

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Introduction

Crime is a positive or negative act that the law prohibits and considers punishable (Dehkhoda 1385 Sh, 1:867). Article 2 of the Islamic Criminal Code states, "An act or a failure to act which is punishable by law or requires security process or educational measures is considered a crime." According to *Dēnkard III*, 1 punishment "is nothing but pain that arises from the crime itself." From the point of view of the Quran, crime can occur in all aspects of human speech, action, and thought.

The earliest codified laws available to us are the codes of Hammurabi and the Hittites. The code of the Hittites was written ca. 1650-1500 BCE and contains two-hundred laws; it is the largest code after the Hammurabi code.

In Iran, the Achaemenids followed the previous laws, especially the laws of Hammurabi, in formulating their criminal law. After the suppression of the riots in the beginning of his rule, Darius I ordered the collection of sentences based on the laws of Hammurabi, which unfortunately is not extant today but parts of it are preserved in the Achaemenid royal inscriptions of the Behistan (Olmmstead 1386 Sh, 161-74).

During the Achaemenid period, the death penalty was legislated for crimes such as murder, rape, betrayal, sodomy, poisoning others, giving and taking bribes, intrusion into the king's privacy, approaching one of his concubines, sitting on his throne, disrespecting the royal family, planning the murder of the king or a member of his family (Briant 2002, 123-24, 261; Dandamaev 1989, 291-92). This death penalty was executed in different ways in the Achaemenid era, including beheading, hitting, crushing, and cutting by two stones (Hinz 1386 Sh, 326).

^{1.} The book *Dēnkard* is a tenth century compendium of Zoroastrian beliefs and rituals.

In the case of crimes committed against the king, a more severe punishment was imposed, as Darius I states that there is a person who disobeyed the command of the King and has been sentenced to death (DB:C.II/ § 70-78; Kent 1953, 122-24; Waters 2014, 93).

In Iran, during the Sasanian period (226-651 CE), Zoroastrian priests were legislating laws according to their religious tradition. The Sasanian law book, which is is a unique document of the Sasanian legal system and a collection of legal cases, is *Mādayān* $\bar{\imath}$ *hazār dādestān* (The Book of a Thousand Judgments). Besides this book, we can find legal decisions and cases in *Avesta*, especially *Vendidad*. The other Middle Persian books containing legal cases are *Dēnkard*, *Rivāyat* $\bar{\imath}$ *ādur farnbag*, *Rivāyat* $\bar{\imath}$ *ēmēd ašawahištān*, *Rivāyat* $\bar{\imath}$ *dārāb homazdyār*, *Sad dar nasr and sad dar bundahišn*, *Nāmag* $\bar{\imath}$ *tansar*, *Šāyist nē šāyist*, *Mēnog* $\bar{\imath}$ *xrad*, *Pahlavi rivāyat*. The book *Ardāwirāf nāmag* is an account of Ardā Wirāf's vision of heaven and hell, and in parts of it Wirāf describes crimes and their punishment in the afterlife.

In the Sasanian period, Zoroastrian priests had judicial authority and were the heads of local courts, but the king had the highest judicial authority and his judgment was irrevocable (Christensen 1944, 301). At the time of the King Khosro I (531-579 CE), the death penalty was inflicted only on outlaws or those who escaped from battles (Sami 1342 Sh, 216).

In the Islamic Republic of Iran, the sources of the law are the Quran, Hadith, ³ the consensus of jurists (*ijma*), ⁴ and reason (*'aql*). For

^{1.} The sacred scripture of Zoroastrianism.

^{2.} The *Vendidad* is a part of *Avesta* and means "the law repudiating the Demons" (Benveniste 1970).

^{3.} The sayings and actions of Prophet Mohammad and the Imams.

^{4.} The consensus of Shiite scholars on a religious ruling.

Muslims, the Quran is the most important source of law, but one cannot accurately understand its rulings unless one has advanced training in religious and legal sciences (Mayer 1984, 299). After the Islamic revolution of Iran in 1979, the revolutionary Islamic courts were set up. These courts had jurisdiction to try political crimes, which the law had not defined such as terror, conspiracy, armed rebellion, destruction of installations, espionage for foreign powers, drug-related crimes, homicide committed in support of the Pahlavi regime or to oppress the people (Peters 2005, 160; Cress 2014, 1). The decisions of these courts were non-appealable.

In the Islamic Republic of Iran, a number of organs deal with judicial issues. In 1979, the Guardian Council, composed of six experts of Islamic law appointed by the supreme leader and six jurists appointed by the Parliament, was established. This council has the authority to pass final judgment on, and holds veto power over, all the legislations of the Iranian Parliament.

The judiciary of the Islamic Republic of Iran is an independent power that protects individual and social rights and is responsible for implementing justice (article 156). The head of the judiciary is appointed for five years by the supreme leader and must be a *mujtahid* (an expert of Islamic law) and righteous (article 157). He has the power to appoint and dismiss judges, define their jobs, make promotions, transfer judges, and prepare judicial bills (article 158). The Ministry of Justice in the Islamic Republic is responsible for all matters relating to the relations between the judiciary and the executive power and legislature (article 160). The Supreme Court is established to monitor the proper implementation of laws in the courts and unified judicial processes.

In this article, we will compare capital punishment in Zoroastrian texts, the Quran, and the penal code of the Islamic Republic of Iran, and will show the result in a table at the end.

Capital Punishment in Zoroastrian Texts

According to the third book of *Denkard*, a person who confesses to a margarzān sin (a capital sin for which there is no repentance) in a court will be sentenced to death. The *margarzān* sins, according to the Middle Persian texts, are as follows: putting a corpse in water or fire, moving a corpse that has not been seen by a dog alone, eating something in order to commit suicide (Unvala 1922, 1:300; 2:41), converting from Zoroastrianism/ Mazdayasna to another religion (Mirfakhraee 1367 Sh, 4), teaching another religion to an *ašavan* (righteous person) consciously (Vendidad 15), killing a human being unless he confesses to his crime, false judgment, a twelve-year-old girl's disobedience towards her husband, a wife's saying to her husband "I am not your wife" three times, a father's saying to his son "You are not my son" three times, and a son's disobeying his father three times (Dhabhar 1909, 101). According to the book Šāvist nē šāvist, if a girl does not marry, she will be sentenced to death (Mazdapour 1369 Sh, 127). According to the book *Rivāyat ī Dārāb* Hormazyār, if a husband sees her wife with another man in an inappropriate position during the reign of an Iranian king reign, she shall be killed, but if it happens during the reign of a non-Iranian king, she shall repent (patet) (Unvala 1922, 197). If a man has sexual intercourse four times with a non-Mazdaean woman, he will be margarzān (deserving death) (Unvala 1922, 305). Other sinners who face the death penalty include female prostitutes (Dhabhar 1909, 48), a man who wounds his pregnant wife and causes abortion (Rezai Baghbidi 1384 Sh, 38), a man who has sexual intercourse with a pregnant woman and causes stillbirth

(*Vendidad* XV, 8), a woman who leaves her child near the fireplace and the child burns and his corps catches fire (Rezai-Baghbidi 1384 Sh, 116), a man who owes an orphan something and does not give it to him after one year (Rezai-Baghbidi 1384 Sh, 121), one who carries a corpse under rain (Unvala 1922, 1:116), a man who hides the corpse of a dog or a man in the earth and the body remains in the soil after one year (Dhabhar 1909, 82), If a person pours water on a menstruating woman, for every drop of water, he will be *margarzān* (Unvala 1922, 209)², children who do not execute their father's testament in the case of a property that he has left for charity (Unvala 1922, 59), a priest (*dastur*) who reveals a man's confession (Mirfakhrai 1367 Sh, 22), using sorcery, one who gives a hot food to a dog that burns the dog's throat (*Vendidad* 15:2), a man who shouts or throws stones at a pregnant bitch and causes the death of the whelps (15:5), a person who kills a dog, fox, ferret, or beaver (Unvala 1922, 305), and a doctor who causes the death of three patients.

Capital Punishment according to the Quran

The Quran mentions three categories of worldly punishment: (1) punishments inflicted by human beings for those who commit sins such as adultery, fornication, theft, consumption of alcohol, brigandage, and

^{1.} In *Avesta* (*Vendidad III*, 37), the penalty of this person is a thousand lashes with the *aspahe-aštra* (a kind of whip), and a thousand lashes with the *sraošo-čarana*.

^{2.} However, according to Azarfarnbagh Farroxzādān, every drop of water poured on a menstruating woman creates more than a sin deserving a Stir (Rezai-Baghbidi 1384 Sh, 110),

^{3.} Sorcery is a sin with the death penalty. According to the book *Mādayān ī hazār dādestān*, if a sorcerer does not show a sign of magic, the written order should not be issued (Perikhanian 1997, 275). The book *Ardā Wirāf nāmag* describes the penalty of a sorcerer in heaven as follows: "I also saw the soul of a woman who chewed and ate her body with her teeth, and I asked: 'Whose soul is this?' Srosh the pious and Adar the angel said: 'This is the soul of that wicked woman, by whom, in the world, sorcery was practiced'" (Gignoux 1386 Sh, 71).

accusations of unchastity, (2) natural punishments ("Whatever misfortune happens to you, is because of the things your hands have wrought, and for many [a sin] he grants forgiveness" [Quran 42:30]), and punishments caused by supernatural causes ("Shall I point out to you something much worse than this, [as I judged] by the treatment it received from Allah? Those who incurred the curse of Allah and his wrath" [Quran 5:60]). However, most of the punishments mentioned in the Quran are otherworldly punishments: "Verily, he who comes to his Lord as a sinner (at judgment) for him is hell: therein shall he neither die nor live" (Quran 20:74).

Capital punishment in the Quran is legislated only for the following crimes:

1. Murder: "A believer intentionally killing a believer, thus his recompense is hell, to abide therein (forever) and the wrath and the curse of Allah are upon him and a dreadful penalty is prepared for him" (Quran 4:93).

2. Being a "hypocrite":

You will find others who desire that they should have security from you, and security from their own folk. So often as they are returned to hostility they are plunged therein. If they keep not aloof from you nor offer you peace nor hold their hands, then take them and kill them wherever you find them. (Quran 4:91)

3. Waging war against God and His messenger:

The only reward of those who make war upon Allah and His messenger and strive after corruption in the land is execution or crucifixion or cutting off of hands and feet from opposite sides or exile from the land. Such will be their degradation in the world, and in the hereafter theirs will be an awful doom. (Quran 5:33)

Capital Punishment according to the Penal Code of the Islamic Republic of Iran

Corporeal punishments have three categories in the Islamic penal code: $qis\bar{a}s^1$, $hud\bar{u}d^2$ and $ta'z\bar{\imath}r\bar{a}t.^3$ In the category of $qis\bar{a}s$, a murderer may be executed or forgiven by the heirs of the victim or may be required to pay the $diya.^4$ Article 290 of the Islamic penal code is on $qis\bar{a}s$. If a person intentionally causes the death of one person or more, he will be sentenced to death though forgiveness is advised both in the Quran and in the Iranian penal code. The crimes with $hud\bar{\imath}d$ punishments include theft, robbery, adultery, apostasy, rebellion against Islam, and drinking alcohol.

In the Islamic Republic of Iran, a person who insults Prophet Mohammad should be executed (article 262). In the previous penal code (1370 Sh), the punishment for insulting the Imams and Fāṭimah (the Prophet's daughter) was also execution (article 513). According to the book *Mabāni takmilat al-Minhāj*, he who claims to be a prophet is to be executed as well (Mūsawī Khū'ī 1386 Sh, vol. 41).

The penalty of *muḥāraba*⁵ is one of these four punishments: execution, crucifixion, cutting of the right hand and the left foot, and banishment (article 282). The most important basis of this article is Quran 5:33 (see above).

^{1.} *Qiṣāṣ* (literally, "retaliation") is punishment for murder or bodily harm and has two types: life *qiṣāṣ* (*qiṣāṣ* -e nafs) and limbs *qiṣāṣ* and is equivalent to the offence.

^{2.} *Ḥudūd* (plural of *ḥadd*, lit. boundary) are fixed penalties mentioned in the Shariah for certain crimes.

^{3.} *Ta'zīrāt* are punishments which are not fixed in the Shariah but are left to the judge's discretion.

^{4.} *Diya* is financial compensation awarded to an injured victim or the heirs of a murdered victim (Ghassemi 2009, 163).

⁵ *Muḥāraba* means use of weapons in order to damage people's life or property or to intimidate them, causing insecurity in the living environment (Zerāʿat 1392 Sh, 378).

The penalty of a person who is a "corruptor on earth" is execution. According to article 286, any person or group that intentionally takes threatening action against the health of the Islamic society of Iran is a corruptor on earth. Such actions include drug dealing in large quantities, distribution of dangerous or poisonous materials on an extensive level, establishment of prostitution centers on an extensive level, disruption of the country's economy, disturbing security and order, and stealing repeatedly.

The *hadd* of adultery is execution if it is incestuous, if it happens between a man and his stepmother or between a non-Muslim man and a Muslim woman (in which case the man would be sentenced to death), and if it involves rape (in which case the rapist would be sentenced to death) (article 224). The *hadd* of a married adulterer is being stoned to death; if this penalty cannot be inflicted, it will be replaced by one hundred lashes (article 225). The penalty of sodomy is execution; if it cannot be inflicted, it will be replaced by one hundred lashes (article 234). Some jurisconsults believe that the penalty of stoning to death existed before Islam and Islam only affirmed it, but other jurisconsults do not consider it a canonical punishment (Ibn Hazm 1408 AH, 11:233).

A group who carry out armed uprising against the Islamic republic of Iran are considered outlaws, and if they use weapons, they will be sentenced to death (article 278). A person who steals repeatedly will be sentenced to death if the judge recognizes him as a corruptor on earth. According to the Iranian *Penal Code of Disruptors in the Economic System*, forgers of banknotes who intend to harm the Islamic Republic of Iran in this way are sentenced to death (article 2).

Whenever a person commits for the fourth time a crime with *ḥadd* punishment, he will be executed (article 136). Article 136 did not exist

with this content in the former Islamic penal code of Iran; only the penalty of drinking for the third time was stated to be execution (Zerāʿat 1392 Sh, 238).

Another crime with the death penalty that has not been mentioned in the penal code but is common among jurisconsults is sorcery. A Muslim magician will be sentenced to death, but a non-Muslim magician will not be executed (Mūsawī Khū'ī 1386 Sh, 324).

Conclusion

From the above, it can be concluded that crime is a relative phenomenon that has different definitions according to time and place, and the established laws represent the concerns of societies in each period. By studying the law of ancient Iran, we find that some of the actions that were considered crimes are not considered so today, and their punishments are unacceptable to us, such as the death penalty for carrying the body alone or removing it from the water. Some believe that such punishments may be the penalty for those "sins" in the hereafter, not in this world; and there may be other explanations for those penalties that are not obvious to us today.

The attitude of the Quran toward the nature of the punishment and its use is completely different from the Zoroastrian penal law. By studying the Quran, we find that the penalty for each crime is equal to the amount of damage caused by the crime. Also, most of the punishments mentioned in the Quran are related to the hereafter, and the death penalty is prescribed only in a few cases. The Quran considers the killing of an innocent person to be a grave sin.

In the Islamic Republic of Iran, the death penalty is not sanctioned only on the basis of the Quran but also on the basis of legal criteria.

Finally, we can see that there are crimes that are considered so by Zoroastrian sources, the Quran, and the Islamic penal code of Iran, and some only by two or one of them, as shown in the table below.

Capital Punishments in Zoroastrianism, the Quran, and the Islamic penal code of Iran

	Zoroastrianism	Quran	Islamic penal code of Iran
1	Putting a corpse in fire or water		
2	moving a corpse that has not been seen by a dog alone		
3	Eating something in order to commit suicide	A person who commits suicide will go to hell. (4:29-30)	It is a sin but not a crime with capital punishment
4	Converting from Zoroastrianism to another religion	"Whoever turns back upon heels, he will by no means do harm Allah" (3:144).	One who converts from Islam to another religion will be sentenced to death.
5	Intentionally teaching an alien religion to a righteous person		
6	Killing a human being	Punishment of murder is going to hell (4:93).	Qiṣāṣ
7	False judgment	"Whoever does not judge according to Allah's revelation, then such are indeed considered the disobedient" (5:47).	If a judge makes a mistake and inflicts material or psychological harm on someone, compensation is obligatory (Zerāʿat 1392 Sh, 70)
8	Disobeying the husband	The penalty is beating (lightly) (4:34).	No alimony will be paid to her.
9	Saying three times to one's husband, "I'm not		

	Zoroastrianism	Quran	Islamic penal code of Iran
	your wife," saying three times to one's son "You aren't my son," or or the son who disobeys his father three times		
10	A girl who refuses to marry		
11	Seeing one's wife with another man in a inappropriate position	For each of them, one hundred lashes (24:2); "Confine them to houses until death" (4:15).	Stoning to death, and if not possible, execution; otherwise, one hundred lashes for each one (article 224-225).
12	Having four times sexual intercourse with a non- Mazdaean woman	It is not permissible to marry a non-Muslim: "Do not marry unbelieving woman until they believe" (2:221).	In civil law, marriage between a Muslim woman and a non-Muslim man is forbidden, but the law is silent about the marriage between a Muslim man and a non-Muslim woman (article 1059).
13	A female prostitute	The penalty prescribed for adultery (4:15)	Nothing is mentioned in this regard (see Borhani 2009).
14	Wounding one's pregnant wife and causing abortion	"Do not kill the soul which Allah has forbidden its intentional murder except for the requirements of justice" (6:151).	Anyone who causes abortion willfully by assault or harassment will be convicted to imprisonment from one year to three years and to pay blood money (diya) (article 622). If the husband causes abortion, he should only pay the diya.

	Zoroastrianism	Quran	Islamic penal code of Iran
15	Having sexual intercourse with a pregnant woman and causing the stillbirth		If the husband commits this, he should only pay the diya.
16	Leaving a child near the fireplace, and causing him to burn		
17	Usurping the property of an orphan	"(As for) those who unjustly eat up the property of Orphans, eat up a fire into their own bodies they will soon be enduring a Blazing Fire" (4:10).	
18	Carrying the corpse under the rain		
19	Hiding the corpse of a dog or a man in the earth		
20	Pouring water on a menstruating woman		
21	Failing to execute the testamentary of one's father	"If anyone changes the bequest after hearing it, the guilt shall be on those who make the change. For Allah hears and knows (All things)" (2:181).	
22	Revealing the confession of a man by a clergyman (dastur)	" they offer no intercession except for those with whom He is well pleased, and they stand in awe and reverence of His" (21:28).	

	Zoroastrianism	Quran	Islamic penal code of Iran
23	Sorcery	Nothing is mentioned regarding the punishment of a sorcerer.	Nothing is said in the penal code in this regard, but some jurisconsult believe that sorcerers are to be sentenced to death.
24	Giving a hot food to a dog that burns his throat	"Satan said: 'will order them to slit the ears of the cattle and Indeed I will order them to change the nice nature created by Allāh so Whoever takes Satan as protector Instead of Allāh, he will surely suffer A severe loss" (4:119).	Poisoning, defacing, or killing animals are punishable by imprisonment from 91 days to 6 months or a financial penalty (article 679).
25	Shouting at a pregnant bitch or throwing stones at her such that it causes the whelps to die	See above	See above
26	Killing a dog, fox, ferret, or beaver	See above	See above
27		"The punishment of making war against Allah and his messenger and striving after corruption in the land is execution or crucifixion or cutting off of hands and feet from opposite sides or exile from the land" (5:33).	The penalty of muhārabah is one of the following: 1. execution 2. crucifixion 3. cutting the right hand and the left foot 4. exile from the land (article 282).

	Zoroastrianism	Quran	Islamic penal code of Iran
		There is no punishment for insult in the Quran, but there are some	
28		verses about hurting the Prophet. Some jurisconsults believe that insult is a kind of hurting: "those who vex the messenger of Allah, for them there is a painful doom" (9:61; also see 33:57).	The penalty of insulting Prophet Muhammad is execution (article 262).

References

- Benveniste, E. 1970. "Que signifie 'Vidēvdāt'?" In *Henning Memorial Volume*, edited by M. Boyce and I. Gershevitch, 37–42. London: Lund Humphries.
- Borhani, M. 2009. "Iran's Criminal Politics against Prostitution." *Journal of Women's Strategic Studies* 45: 7-42.
- Briant, Pierre. 2002. From Cyrus to Alexander: A History of the Persian Empire. Translated by Peter T. Daniels. Winona Lake, Indiana: Eiesnbrauns.
- Christensen, A. 1944. *L'Iran sous les Sassanides*. Copenhagen: E. Munksgaard.
- Cress, Ronald, Catherine Kent, and Mohammad Nayyeri. 2014. *Human Rights in Iran Units*. Colchester: University of Essex.
- Dandamaev, M. A. 1989. *A Political History of the Achaemenid Empire*. Translated into English By W. J. Wogelsang. Leiden: Brill.
- Dehkhoda, A. A. 1385 Sh. *Farhang Dehkhoda*. 2 vols. Tehran: Tehran University Press.
- Dhabhar, E. B. N. 1909. *Sad dar Nasr and Sad dar Bundehesh*. Byculla: British India Press.
- Entessar, N. 1988. "Criminal Law and the Legal System in Revolutionary Iran." *Boston College Third World Law Journal* 8 (1): 81-102.
- Ghassemi, Gh. 2009. "Criminal Punishment in Islamic Societies: Empirical Study of Attitudes to Criminal Sentencing in Iran." *European Journal on Criminal Policy* 15: 159-80.
- Gignoux, P. 1386 Sh. *Ardāvirāf nāmeh*. Translated into Farsi by Jaleh Amouzegar. Tehran: Moein and Anjoman-e Iranshenasi-e Farance.
- Hinz, Walther. 1386 Sh. *Darius und die Perser*. Translated into Farsi by Parviz Rajabi. Tehran: Mahi Press.
- Ibn Ḥazm, ʿAlī ibn Aḥmad. 1408 AH. *Al-Muḥalla*. Beirut: Dar al-Kutub al- ʿIlmiyyah.
- Kent, Ronald G. 1953. *Old Persian Grammar, Text, Glossary*. American Oriental Society.

- Madan, ed. 1911. Pahlavi Dinkard, I, II. Bombay.
- Mayer, A. E. 1984. "Islamic Law." In *Islam: The Religious and Political Life of a World Community*, edited by M. Kelly, 226-42. New York: Praeger.
- Mazdapur, K. 1369 Sh. *Shāyist Nāshāyist, a Pahlawī Text*. Tehran: Cultural Studies and Research Institute.
- Mirfakhrai, M. 1367 Sh. *Revāyate Pahlavī*. Tehran: Institute for Humanities and Cultural Studies.
- Mūsawī Khū'ī, A. Q. 1386 Sh. *Mabānī Takmilat al-Minhāj: al-qaḍā' wa al-hudūd*. Vol. 41. Qom: Mu'assasat Iḥyā' Āthār al-Imām al-Khū'ī.
- Olmmstead, A.T. 1386 Sh. *History of the Persian Empire*. Translated into Persian by Mohammad Moghadam.Tehran: Amir Kabir press.
- Perikhanian, A. 1997. *The Book of a Thousand Judgements (a Sasanian Law-Book)*. Costa. Mesa, California and New York: Mazda Publishers & Bibliotheca Persica.
- Peters, R. 2005. Crime and Punishment in Islamic Law, Theory and Practice from the Sixteenth to the Twenty-first Century. Cambridge University Press.
- Rezai Baghbidi, H. 1384 Sh. *Rivāyat-i Azarfarnbagh Farroxzadan*. Tehran: Center for the Great Islamic Encyclopaedia.
- Sami, A. 1342 Sh. *Tamaddun Sāsānī*. Shiraz: Mousavi Publication.
- The Quran. Translated by M. M. Pickthal.
- Unvala, E. M. R. 1922. *Dārāb Hormazyār's rivāyat*. Bombay: British India Press.
- Waters, Matt. 2014. Ancient Persia. New York: Cambridge University Press.
- Zerā'at, A. 1392 Sh. *Sharḥ-i mukhtaṣar-i qānūn-i mujāzāt-i islāmī*. Vol 1. Tehran: Qoghnous.