



IBA ICC MOOT COURT

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2027 IBA International Criminal Court Moot Court Competition

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Case before the International Criminal Court (ICC):

The Prosecutor v. Duncan Hightower

Situation in The State of Eastguard

Appeal from the Pre-Trial Chamber's Confirmation of Charges

This is a fictional case intended to educate students about the law and practice of the ICC.¹ Participating teams will be divided into three roles: (1) Counsel for the Defendant (Duncan Hightower) who brings this appeal; (2) Counsel for the Prosecution; and (3) Victims' Counsel. Pursuant to the rules of the competition, each team shall write a Memorial for each of these roles, setting forth its legal arguments in the context of the interlocutory appeal by The Defense, challenging the Pre-Trial Chamber's Confirmation of Charges *in absentia* concerning Duncan Hightower. Oral arguments shall follow the order set forth above.

¹ Names in the IBA ICC Moot Court Case are fictional. Any similarities to real persons or literary, television or video game characters are coincidental and unintended.

Established Agenda for the Appeal of the Pre-Trial Chamber's Decision

Pursuant to Pre-Trial Chamber XV's decision to grant the Defendant's request for leave to appeal the Confirmation of Charges Decision of 10 September 2026 (reproduced below), the Appeals Chamber seeks submissions of the parties and participants on the following three issues:

1. Whether the Pre-Trial Chamber erred in concluding that it could confirm the charges against the Defendant *in absentia* pursuant to Articles 61(2) and 61(7) of the Rome Statute in a case where the Defendant's whereabouts were known but the State in which he is present refused to surrender him to the Court and has taken steps to shield him from accountability.
2. Whether the Pre-Trial Chamber erred in finding substantial grounds to believe that the Defendant, by ordering the exploitation and causing the ruination of the Deepstone Gorge coal mines in violation of the international humanitarian law principle of usufruct, committed war crimes under Articles 8(2)(a)(iv), 8(2)(b)(xiii), 8(2)(b)(xvi), and 25(3)(b) of the Rome Statute.
3. Whether the Pre-Trial Chamber erred in finding substantial grounds to believe that the Defendant was criminally liable under Article 28 of the Rome Statute as a commander for war crimes in the occupied city of Castlerock (namely attacks on civilians under Article 8(2)(b)(i), clearly excessive incidental harm under Article 8(2)(b)(iv), and attacks on protected buildings under Article 8(2)(b)(ix)) that were committed by "digital subordinates."

In addition to these three issues, the Victims' Counsel applied to the Pre-Trial Chamber for leave to appeal its denial of its request for the appointment of two separate Victims' Counsel, one for the charges related to Deepstone Gorge and one for the charges related to Castlerock. As the Pre-Trial Chamber held that the victims lack standing to seek the appeal, the Appeals Chamber invites submission by the Victims' Counsel, Defendant, and Prosecution on the question of standing and the merits of the Victims' Counsel request as a preliminary matter within the Defendant's appeal.

Pre-Trial Chamber XV
The Prosecutor v. Duncan Hightower
Situation in the State of Eastguard

PRE-TRIAL CHAMBER XV of the International Criminal Court issues, pursuant to Articles 61(2)(b) and 61(7) of the Rome Statute, this Decision on the confirmation of charges *in absentia* against Duncan Hightower, a national of the Republic of Westguard. The confirmation of charges hearing was held on 13-17 July 2026 in the absence of the Defendant, pursuant to Article 61(2) of the Statute.

Jurisdiction

1. In accordance with Article 19 of the Rome Statute, the Court must satisfy itself that it has jurisdiction in any case brought before it and that the case is admissible. The Defendant, age 52, is a national of the Republic of Westguard, who holds the rank of Major General and served as Commander of Westguard's armed forces in the occupied territory of Deepstone Gorge in the State of Eastguard at all relevant times with respect to the charges of war crimes allegedly committed there. Neither the Republic of Westguard nor the State of Eastguard is a party to the Rome Statute, and the Security Council has not referred this matter to the ICC. Instead, jurisdiction in this case is based, pursuant to Article 12(3), on the Declaration of the State of Eastguard, deposited with the Court on 1 June 2025, accepting the jurisdiction of the ICC over international crimes in its territory and against its population from 1 June 2025 until such time that Westguard ends its occupation of Eastguard's territory. In this respect, the Chamber notes that the Prosecution charges General Hightower with war crimes under Article 8 of the Rome Statute allegedly committed on the territory of Eastguard between 1 June and 2 August 2025, which fall within the parameters of the situation referred by Eastguard. Westguard, in whose territory the Defendant is located, refuses to arrest or surrender the Defendant. Therefore, the Chamber is satisfied that the case is admissible and that the Court has territorial, material and temporal jurisdiction.

Procedural History

2. On 30 July 2025, following its review of the Prosecution's application, Pre-Trial Chamber XV issued a Warrant of Arrest for General Duncan Hightower, based on allegations that he (a) ordered and caused violations of the international humanitarian law principle of usufruct with

respect to the occupied territory of Deepstone Gorge – a war crime under Articles 8(2)(a)(iv), 8(2)(b)(xiii), 8(2)(b)(xvi) and 25 of the Rome Statute; and (b) bore command responsibility for war crimes committed by “digital subordinates” in the occupied city of Castlerock under Articles 8(2)(b)(i), 8(2)(b)(iv), 8(2)(b)(ix), and 28 of the Rome Statute.

3. When the Registrar transmitted the Warrant of Arrest to Westguard via diplomatic channels on 1 August 2025 and requested that Westguard transfer General Hightower to the Court for the confirmation of charges proceedings, the authorities of Westguard immediately denied the request, noting that in Westguard’s view General Hightower did nothing wrong and that Westguard is under no duty to cooperate with the Court as a non-party to the Rome Statute. The next day, the President of Westguard, Helena Arrix, publicly announced: “In order to shield our heroic General from the overreach of the International Criminal Court, I have relieved General Hightower of his position in charge of the occupation of Deepstone Gorge and transferred him to an important advisory position at our Military Headquarters in Highcastle.” Westguard has confirmed that General Hightower is being housed in the officers’ quarters at the Military Headquarters under the protection of Westguard. The Registrar followed up by sending repeated requests for the arrest and surrender of Hightower, including working through INTERPOL to issue a Red Notice, sending emails and letters to the Highcastle Military Headquarters where Hightower resided, publishing the arrest warrant on the ICC website, and launching a social media campaign to attempt to induce Hightower’s surrender. Convinced that it could not obtain custody over the Defendant under the present circumstances, on 1 September 2025 the Prosecution submitted a request to hold a hearing on the confirmation of charges against General Hightower in his absence under Article 61(2) of the Rome Statute.

4. On 15 September 2025, Pre-Trial Chamber XV issued an order scheduling a hearing on the confirmation of General Hightower’s charges under Article 61(2) of the Statute for 13-17 July 2026. That same day, the Registry transmitted certified copies of this order to the Government of Westguard as well as to General Hightower at his place of residence, and it appointed Defense counsel to represent General Hightower in his absence pursuant to Article 61(2) of the Rome Statute and Rules 123, 125 and 126 of the ICC Rules of Procedure and Evidence. The Pre-Trial Chamber simultaneously ordered the appointment of a single Victims’ Counsel pursuant to Rule 90 of the ICC Rules of Procedure and Evidence. On 3 December 2025, the Pre-Trial Chamber denied Victims’ Counsel’s request that the Chamber order the appointment of a second Victims’

Counsel on account of factual and legal distinctions that may raise fairness concerns for the different groups of victims (i.e., those in Deepstone Gorge and those in the city of Castlerock).

Findings and Conclusions

5. The Prosecutor, Defense Counsel, and Victims' Counsel participated in the confirmation of charges proceedings from 13-17 July 2026. At this stage of the proceedings, the Prosecutor's burden of proof is to establish "substantial grounds to believe" that the Defendant committed or is otherwise responsible for the charged war crimes. During the proceedings, the Prosecution submitted recorded statements of five witnesses (including an insider who had served as the Defendant's senior aide before defecting in August 2025), mobile phone videos using the self-authenticating eyeWitness to Atrocities app, NGO reports, media accounts, satellite imagery, transcripts of telephone intercepts, and hospital records to substantiate the charges. The evidence, arguments, and the Chamber's conclusions are summarized below.

6. This case concerns three States – the Republic of Westguard, the State of Eastguard, and the Kingdom of Southguard – that are located on the island of Pentasia in the North Atlantic Ocean. Pentasia has a subarctic climate with long, cold winters and short, mild summers. At all relevant times, the three States have been members of the United Nations and parties to the 1907 Hague Convention/Regulations, the 1949 Geneva Conventions and their Additional Protocols, and the 1982 UN Convention on the Law of the Sea. While not drawn to exact scale, the map at Appendix A provides visual context.

- On the west side of the island is the Republic of Westguard, with a population of 7 million people and territory covering 2,000 square miles. Westguard is a developed nation with a thriving economy (\$100 billion GDP) based on fishing, electrical power generation from coal, and high-tech development focusing on drones and Artificial Intelligence. Westguard's armed forces consist of 200,000 military personnel, 500 armed jeeps, 35 helicopter gunships, 30 corvettes, and 5,000 First-Person-View kamikaze drones. Its armed forces are based at its capital, Highcastle (population 2 million), located on the western shore of Blackharbor.
- On the east side of the island is the State of Eastguard, with a population of 2 million people and a territory covering 3,000 square miles, including a sparsely populated 500 square mile area known as Deepstone Gorge. The Gorge is bounded on the west by the

Runestone River, the historic border between Westguard and Eastguard (in yellow on the map), and on the east by the Blackwater River (occupied territory border shown in green on the map). The land between these two rivers is rich in bituminous coal deposits and is the site of 30 operating coal mines, producing 50 million tons of coal annually. Eastguard has an additional 20 coal mines in its territory east of the Blackwater River. Eastguard is a developing democratic nation led by a president, with a \$5 billion GDP economy based primarily on the mining and export of coal. It has a small army of 50,000 personnel, and no navy or air force, but its national constitution guarantees its citizens the right to bear arms, and most of its citizens own rifles. It has two large cities: Qohar City (population 1 million) to the east and Castlerock (population 500,000) at the southern tip of Deepstone Gorge. The government-owned Quicksilver railroad runs from Castlerock in the south through Deepstone Gorge (represented by the dotted black line on the map).

- To the south of Westguard and Eastguard is the Kingdom of Southguard, with a population of 2 million people and a territory covering 1,000 square miles. Southguard's \$2 billion GDP economy is based largely on production and export of cement. Southguard has a small army and navy headquartered at Southguard's capital, Sunspoke (population 1 million).

7. Westguard and Southguard have a history of conflict related to the territorial rights to Blackharbor, a large marine bay located between the three countries. The waters of Blackharbor are rich in cod, halibut, salmon and trout. Based on the theory of historic entitlement, in 1987 Westguard claimed exclusive rights to the fish in Blackharbor and began to use its superior naval and air power to enforce its claim.

8. Until recently, Westguard and Eastguard had friendly relations. In 1987, the two countries entered into the Westguard-Eastguard Trade Agreement (WETA). The treaty provided in relevant part that:

- "Eastguard shall sell its excess coal exclusively to Westguard at a price no higher than the domestic price for its coal;
- Westguard shall sell its excess grain to Eastguard at a price no higher than the domestic price for its grain; and

- Westguard shall permit Eastguard's fishing vessels to fish the waters of Blackharbor if they adhere to Westguard's prescribed catch limits that apply to Westguard's fishing vessels. To qualify, such vessels must be registered to Eastguard, owned by Eastguard nationals, and operated by Eastguard nationals.
- This Trade Agreement may be terminated by either Party with one-year notice."

9. In the years since the WETA entered into force, Westguard has grown reliant on its coal imports (averaging 40 million tons of coal annually) from the coal-rich Deepstone Gorge area of Eastguard for its growing power needs. Owing to the vast source of inexpensive coal, Westguard's economy grew at an impressive rate of 7 percent a year from 2010-2024.

10. In Eastguard's presidential election on 4 November 2024, the Winterfell Party defeated the long-ruling Kingslanding Party and gained control of the Eastguard government. During the campaign, the Winterfell presidential candidate, Sensa Stark, bitterly complained that the WETA unfairly benefited Westguard and impeded Eastguard's economic growth – an issue that resonated with the electorate. The day she took office on 1 January 2025, President Stark announced the immediate termination of the WETA. A week later, she signed a similar treaty with Southguard, giving Southguard exclusive rights to Eastguard's coal exports at a fair market price in return for Southguard giving Eastguard exclusive rights to Southguard's cement exports at a fair market price.

11. On 8 January 2025, Westguard's President, Helena Arrix, sent a diplomatic communication to President Stark, protesting Eastguard's failure to provide the required one-year notice before terminating the WETA. At the same time, the letter indicated Westguard's willingness to negotiate an amendment of the terms of the Agreement to pay a higher price for Eastguard's coal. President Stark responded that she had no interest in any trade agreement with Westguard under any conditions. By the end of April 2025, Westguard's coal reserves were running low. When the weather warmed sufficiently, on 1 May 2025, Westguard sent 100,000 armed troops across the Runestone River, using temporary bridges, into the Deepstone Gorge, supported by helicopter gunships. After two weeks of intense fighting, Westguard defeated Eastguard's forces and successfully occupied Eastguard's coal-rich lands from the Runestone River in the west to the Blackwater River in the east, including the city of Castlerock in the south. To date, no truce or peace agreement has been concluded. The Westguard armed forces placed the municipal

authorities of Castlerock in detention and are using military police to maintain order in the occupied city.

12. On 1 June 2025, President Arrix appointed the Defendant, Major General Duncan Hightower, to the position of Commander of the Occupation and delegated to him full authority and responsibility for all decisions related to Westguard's occupation of the Deepstone Gorge region, exploitation of its resources, and administration of the city of Castlerock. Hightower held this position until 2 August 2025, when President Arrix relieved him as Commander of the Occupation and transferred him to the Military Headquarters in Westguard.

13. Eastguard requested action by the U.N. Security Council to compel Westguard to end the occupation of its territory. In response to Security Council paralysis, on 1 June 2025, the United Nations General Assembly, meeting in emergency session under its Uniting for Peace authority, adopted Resolution ES-15/1, by a vote of 150 in favor, 12 opposed, and 31 abstaining. The resolution provided in relevant part:

- “Determines that the Westguard invasion of Eastguard constitutes an unlawful use of force and that Eastguard's Deepstone Gorge constitutes occupied territory subject to the laws of belligerent occupation and rules of international humanitarian law.
- Reaffirms that no territorial acquisition resulting from the threat or use of force shall be recognized as legal.
- Urges Westguard to withdraw its forces from Eastguard and return Deepstone Gorge to Westguard, and affirms that until then, Westguard is under international legal duties to protect civilians, preserve the *status quo*, respect rights, and allow humanitarian access, while maintaining order and security in the occupied territory.”

Violation of the Principle of Usufruct

14. According to the Prosecution's presentation of evidence, shortly after occupying Deepstone Gorge, at General Hightower's orders, the Westguard army seized the 30 coal mines in the Gorge, which were owned by the State of Eastguard and licensed to private Eastguard companies. General Hightower further assigned hundreds of his troops to operate the 18 coal mines closest to the Runestone River, Blackwater River, and Quicksilver railroad tracks in place of local workers. Under his direction, the coal from those mines was exported to Westguard with the

exception of coal the occupation force provided to the Castlerock power station to meet the electrical needs of the occupied city. To conserve generator power and deny cover to saboteurs, General Hightower ordered his forces to board up the other 12 coal mines and shut off their dewatering pumps. Due to ordinary rainfall during the month of July, these mines quickly filled with water, rendering them unsafe and no longer viable for mining operations. The Prosecution's expert witness in mining testified that the Defendant's orders resulted in hundreds of millions of dollars in economic losses to the inhabitants of Deepstone Gorge. The Prosecutor alleges that these actions constitute war crimes in violation of the international humanitarian law principle of usufruct enshrined in Article 55 of the Hague Regulations concerning the Laws and Customs of War on Land of 1907 and reflected in Articles 8(2)(a)(iv), 8(2)(b)(xiii); and 8(2)(b)(xvi) of the Rome Statute.

15. The Defense concedes that General Hightower's actions violated the principle of usufruct, but argues that strictly interpreted, the Prosecution has not alleged nor proved violations of Article 8(2)(a)(iv), 8(2)(b)(xiii), or 8(2)(b)(xvi) of the Rome Statute. The Defense maintains that the drafters did not intend to include the concept of usufruct in the Rome Statute and that reading it in would violate Article 22(2) of the Rome Statute. The Pre-Trial Chamber disagrees, finding that the principle of usufruct is firmly established in international humanitarian law, Articles 8(2)(a)(iv), 8(2)(b)(xiii), and 8(2)(b)(xvi) should be interpreted consistently with the principle of usufruct, and that the Defendant can be held criminally liable for violating the venerable principle based on the evidence provided by the Prosecution.

Criminal Responsibility Based on the Role of an Artificial Intelligence Program

16. According to the Prosecution's presentation of evidence, Westguard's control of the port city of Castlerock, which is located where the Runestone River and the Blackwater River enter Blackharbor, was necessary to maintain supply lines to the occupying forces in Deepstone Gorge and to efficiently transport coal from the Deepstone mines to Westguard. By 1 June 2025, the population of Castlerock had organized a clandestine resistance to the occupation of their city. Numbering about 500, the members of the resistance group called themselves the Kraxis, named for a mythical dragon that purportedly saved the city of Castlerock from invaders in ancient times. They used Castlerock's abandoned subway system to meet in secret and to surreptitiously traverse

the city to strike Westguard occupation targets. The members of Kraxis did not wear distinctive uniforms nor insignia to distinguish themselves from innocent civilians.

17. During the month of June 2025, the Kraxis carried out dozens of attacks against the Westguard occupiers in Castlerock using mining explosives and rifles. In attacks on June 1, 5, 7, 10, and 15, Kraxis snipers, shooting from second and third-story rooftops, killed two dozen Westguard military personnel as they patrolled the streets of Castlerock. On 3 June, the Kraxis bombed the Castlerock electrical power station, causing a 36-hour power outage throughout the city. On 11 June, the Kraxis bombed the Castlerock water treatment plant, resulting in a 48-hour shortage of clean drinking water. On 17 June, the Kraxis set fire to the Castlerock port, rendering the facilities necessary for coal exports to Westguard inoperable for a week. And on 22 June, the Kraxis set off explosives at the Castlerock rail depot, shutting down rail transport to the coal mines for several days. Although the perpetrators of these attacks were not identified, the Kraxis claimed responsibility for them in leaflets designed to attract new members and terrorize the Westguard occupiers.

18. To respond to the Kraxis attacks, the Defendant decided to deploy a newly developed Artificial Intelligence Decision Support System called “Redstone.” The objective was to use the AI system to identify, target and kill the members of the Kraxis that were participating in attacks on the Westguard occupation using AI-controlled drone strikes. Employing machine learning algorithms, the Redstone system identifies targets based on a myriad of inputs including facial recognition, drone photography and thermal imaging, foot traffic patterns, mobile phone intercepts, tracking mobile phone locations, traffic camera and ATM videos, and informant information. When Redstone recommended a strike, the fire officer’s monitor displayed the location of the proposed target, the justification for the kill, and the temporal window for acting (usually under five minutes).

19. As the Commander of the Occupation, the Defendant was responsible for overseeing the procurement of the Redstone system, the targeting parameters it employed, its testing, its deployment, the training of its operators, monitoring its efficacy, and its recalibration over time. According to the Prosecution’s evidence, since its deployment on 15 July 2025, the Redstone system proved to be 85 percent accurate, making mistakes 15 percent of the time. One particularly egregious mistake resulted in the partial destruction of the ancient cathedral of Thunderhall, a

UNESCO World Heritage Site which turned out not to be a base of the Kraxis's operations as Redstone surmised. Another resulted in the killing of 65 patients and medical staff at the Castlerock Urgent Care Centre, which Redstone mistook for a Kraxis arms depot. In addition, even when the Redstone system resulted in a confirmed kill of a member of the Kraxis, the number of people injured or killed as collateral damage averaged 20 innocent civilians per strike. While there was always a "human in the loop," due to a phenomenon known as "automation bias," the fire officers pushed the attack button 100 percent of the time pursuant to Redstone's recommendations. The use of Redstone effectively suppressed the Kraxis resistance, but at a high price. Altogether, drone strikes recommended by Redstone led to the deaths of an estimated 5,000 innocent civilians and the destruction of 20 percent of Castlerock's buildings between 1 July and 2 August 2026.

20. As a consequence, the Prosecutor argues that deploying Redstone resulted in war crimes relating to the destruction of protected objects (churches and hospitals), failure to distinguish civilians from combatants, and disproportionate harm to civilians in violation of Articles 8(2)(b)(i), 8(2)(b)(iv), and 8(2)(b)(ix) of the Rome Statute. The Prosecution contends that although the Defendant was or should have been aware of these shortcomings, he nevertheless allowed the continued use of Redstone through 2 August 2025 when he was replaced as Commander of the Occupation. By that time, the Kraxis resistance had been substantially eliminated and the new Commander of the Occupation suspended use of Redstone upon taking command.

21. The Prosecutor alleges that the Defendant is criminally liable as a military commander under Article 28 of the Rome Statute for the war crimes resulting from the Redstone strikes. The Prosecution contends that the Defendant exercised effective command and control over both the Redstone system and its human operators, such that Redstone functioned as a "digital subordinate" performing targeting functions previously carried out by subordinate officers. The Prosecution submits that the Defendant knew or, owing to the circumstances, should have known that the strikes recommended by Redstone were resulting in war crimes, yet he failed to take the necessary and reasonable measures within his power to prevent or repress them — such as suspending the system, tightening its parameters, or requiring genuine human verification rather than the automatic approval by the fire officers that in fact occurred — allowing its continued use through 2 August 2025. The Prosecution argues that the term "forces" in Article 28 should be interpreted to capture AI systems integrated into the chain of command such as Redstone.

22. Despite the objections of the Defense that there can be no command responsibility without the commission of crimes by human subordinates, the Pre-Trial Chamber concludes that command responsibility can be based on the flawed actions of an Artificial Intelligence program, and therefore finds substantial grounds to believe that General Hightower can be held criminally liable for the violations of the International Humanitarian Law rules relating to civilians and protected objects in Castlerock.

In Absentia Confirmation of Charges

23. The Defense has argued that confirmation of charges *in absentia* was in contravention of the Rome Statute because General Hightower does not qualify as a person who “cannot be found” within the meaning of Article 61(2)(b) of the Rome Statute since it is known that he is currently residing and working at Westguard’s Military Headquarters in Highcastle.

24. The Pre-Trial Chamber finds that the Prosecution and the Registrar have undertaken reasonable steps to inform the Defendant of his charges and that a hearing to confirm those charges would be held, and that the State of Westguard is willfully shielding General Hightower of accountability by providing him refuge in the Westguard Military Headquarters in Highcastle.

25. The Pre-Trial Chamber agrees with the Prosecution’s interpretation that “cannot be found” can mean that the Defendant “was never available to the Court” because national authorities of a non-party State are willfully shielding the Defendant from accountability and preventing his surrender to the ICC or any other court with jurisdiction over his alleged crimes. This interpretation is consistent with the underlying purposes of Article 61(2)(b) to: (a) publicly air the evidence against the accused to put pressure on the international community to take action against non-cooperating States; (b) create a historic record of war crimes in the event that a proper trial never takes place; (c) preserve and publicly record evidence relevant to any future reparations proceedings; and (d) have a potential cathartic or therapeutic effect on victims/witnesses who would be able to testify in the proceeding or see others similarly aggrieved take the stand. The Chamber therefore finds no bar to confirming the charges in this case in the absence of the Defendant.

Order

For these reasons, in a 2-1 decision, Pre-Trial Chamber XV hereby:

■ Confirms the charges against the Defendant, Duncan Hightower, in his absence, namely:

(1) that the Defendant ordered the exploitation and caused the ruination of the Deepstone Gorge coal mines in violation of the international humanitarian law principle of usufruct, thereby committing war crimes under Articles 8(2)(a)(iv), 8(2)(b)(xiii), 8(2)(b)(xvi), and 25(3)(b) of the Rome Statute; and

(2) that the Defendant is criminally liable under Article 28 of the Rome Statute as a commander for war crimes in the occupied city of Castlerock (attacks on civilians under Article 8(2)(b)(i), clearly excessive incidental harm under Article 8(2)(b)(iv), and attacks on protected buildings under Article 8(2)(b)(ix)) that were committed by “digital subordinates.”

■ Orders the Registrar to notify the parties and participants of this decision.

Dissent by Judge Variance:

I found the arguments of the Defense on all three issues persuasive, and I therefore dissent from the Decision of the majority of the Pre-Trial Chamber.

[Signed] Presiding Judge Friendly, Judge Learned, and Judge Variance (dissenting)

Dated 10 September 2026

The Hague, The Netherlands

Appendix A

