



**FIFTH SYMBIOSIS LAW SCHOOL,
PUNE- INTERNATIONAL CRIMINAL TRIAL
ADVOCACY COMPETITION, 2020
[SICTA]**

COMPRO^{MIS}¹

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¹ Drafted by Adv. Mr. Parth Dixit, Alumnus of SLS-Pune under the supervision of Faculties-in-charge, Student Bar Association, SLS- Pune. Any participant, team or individual relating to the participant or the team, who tries to contact the Problem Framer shall be disqualified from the competition.

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UNDISPUTED FACTS

1. Oceanada (the “**Country**”) is a republic located on the north-eastern Atlantic coast of South America. It is bordered by the Atlantic Ocean to the north, Chatter Islands to the east, Guyena to the west and Planote to the south. At just under 427,164 square miles of area, Oceanada is the one of the largest countries in South America. Oceanada has a population of approximately 558,368 people, most of whom live on the Country's north coast, in and around the capital and largest city, Eudaimonia. This concentration of the population is, in part, due to the geographical landscape of the Country. The geography of the Country exhibits a great variety of terrain and climates. Oceanada has a high level of biodiversity and comprises of several eco-regions with ecological sub-units such as tropical rainforests, dry valleys, and vast masses of grasslands. Further, such topography also features enormous variations in altitude, ranging from an elevation of 20,463 feet the above sea level around the outskirts of Eudaimonia to nearly 70,235 feet along the Bravadariver. A major portion of the Country comprises of the Pandean mountain region which begins in the south-western area of Oceanada and spans around 35 percent of the national territory. This area is located at an altitude of 9,500 feet and hosts some of the highest peaks in South America along with Lake Augustis, the highest commercially navigable lake in the continent.
2. The Country’s population comprises of multiple ethnicities including Europeans, Asians and Africans. This racial and social segregation arose from the English colonialism of the Country and has continued to the modern era. However, the local tribal ethnicity of Oceanada, called Sarrakish, still retains ownership over larger portions of the national territory. English is the official and predominant language of Oceanada.
3. Sarrak de Nova (“**Sarrak**”) is one of the largest concentrations of salts on a flat surface. It is located in the Sarrakish town of Nova on the south-western fronts of Oceanada. The Sarrak is located at an altitude of 3500 metres above sea level and is covered by meters of salt crust. Years

of weathering and natural processes have converted the region into a huge reserve of precious minerals. The crust formed in the centre of the plateau accounts for 40%-50% of the world's lithium reserves. The area has always been a Sarrakish stronghold with generations from the tribal community habituating in the rugged dense landmark. The assemblies built in and around Nova are dependent on the Sarrak as their sole means of livelihood. The area serves as an important source of tourist attraction and also provides the country with consumable salt and industrial minerals. Except for the monsoon months, the region also provides a major transport route for distribution across the mountainous regions of the continent.

4. Since centuries, the tribal population has found employment and trade in domestic extraction of salt and minerals from the Sarrak. Local governance was left to the villagers and any attempts to disturb the sustainability of the area were fiercely resisted. Each tribal family would own a tract of land in the plateau and would form an association to trade with the government. These associations were called "**Relacion(s)**". Fixed amounts of salt would be exchanged for currency which would then be distributed amongst all natives. In the early 1950s, the domestic trade in salt and minerals was complemented with animal husbandry and hospitality inns for foreigners visiting the area.
5. In the year 1979, the Government entered into a memorandum of understanding with the heads of Sarrakish Relacions which paved the way for the establishment of a government owned mill, registered as a corporation in Oceanada, called Lithensgard ("**Lithensgard**" or "**Corporation**"). Lithensgard operated as a joint venture between the government and the local community. Headquartered in Nova, the constitutional documents of Lithensgard were suitably drafted and enforced in a manner that bestowed the Relacion heads with complete operational authority and independence over the extraction activities of the mill under its control. The same also allowed the management to frame internal policies which favoured the Sarrakish community in matters

of employment in Lithensgard. The role of the Government involved the facilitation of distribution channels and service contracts to provide for the smooth functioning of the mills.

6. Since its incorporation, Lithensgard became a symbol of people's participation in local governance. The Corporation yielded continuous profits. Portions of the profit earned were diverted to open a separate business line for hospitality in the area under the same management. It soon earned a name in the global financial markets giving its host nation – Oceanada – a huge impetus in terms of foreign investment. For the political class of Oceanada, the Corporation became an asset of national importance. Since 1980, every national election in the country was fought, *inter alia*, on the strength of reforms aimed at making Lithensgard more robust and efficient.
7. At the turn of the 21st century, Lithensgard had grown too huge for the government to over-see the operation of the mills which were running at high end production and extraction of salt products. Various reforms were suggested including the introduction of foreign experts in the board of directors of the Corporation who would introduce fresh perspectives to the management and a system to check the growth of any possible abuse of authority in violation of the code of ethics promulgated by the founders of the Corporation. Another object behind the reforms was the result of successful lobbying pressure created by other ethnic groups in the country who viewed the exclusive hiring policies of Lithensgard with disdain. At a time when the entire country could benefit from a rise in employment levels against the face of economic stagnation, Lithensgard remained and acted like a closed club accessible to only those who were born in the community of Sarraks. As per news reports, the government's silence over the issue was termed as protectionist by other communities. The international media along with foreign business houses also added pressure on the government to ease the Corporation's bylaws to allow the entry of other individuals who represent the non-Sarrakish groups. The skirmishes revolving around the proposed reforms led to the formation of a political group called the Liberation Army

of Oceanada (“**Liberation Army**”) comprising of and acting as a representative of more than 7000 workers living in the offsite premises in and around Nova. The Liberation Army resolved to open Lithensgard and Sarrak de Nova to the benefit of the unrepresented groups through persistent socio-political advocacy.

8. The suggested reforms led to nationwide protests emanating from the Sarrakish bastions across the country. The government’s high handedness of the protests led to break down of law and order in Sarrak de Nova. Violent confrontations between police forces and the locals destabilised routine life for a period of 210 days and threatened the pristine environment of the country. A compromise was reached between the government and the various heads of Relacions.
9. An excerpt of a report prepared by the National Centre of Economic Studies, an independent think tank based in Oceanada detailing these events and the birth of the Liberation Army of Oceanada has been annexed as **Annexure 1**.
10. The compromise reached between the warring factions was termed and codified into an agreement called the “**Eudaimonian Accord**”. As per the terms of the Eudaimonian Accord, (i) the government was to strategically reduce its stake in the Corporation and sell it to private entities thoroughly vetted by the government; (ii) side letters would be executed with the new investor expecting it to honour the extant arrangements relating to division of power in the Corporation.
11. By 2005, the government had formulated a policy detailing the divestment process and divided the entire transaction into three (3) tranches. The first tranche involved divestment of twenty-five percent (25%) of the Corporation’s share capital, held by the government, through a bidding process. The bidding process resulted in the stake awarded to a foreign investor called ADS (Pty) Limited (“ADS”), registered in South Africa, amongst the shareholders of the Corporation. The shareholding pattern of ADS is given in **Annexure 2**. Being a foreign entity, ADS immediately used its representative directors to make amends to the business methodology of the Corporation.

By pressurizing the government to vote in favour of its designs, it was able to successfully outsource the onsite operations of the Corporation, including the extraction activities, to third-party contractors while reserving the employees from the local community to serve in administrative positions.

12. World Electronics Public Limited Company (“WePlc.” or “World Electronics”), a company incorporated in the United States in the year 1968, is a major conglomerate involved in the manufacture and service of consumer electronics. Their product ranges include a host of offerings such as central processing units, network interfaces, modems, flash memories, sensors et cetera. Their global dominion is a result of years of research and development aimed at indigenous products and support systems. Additionally, World Electronics had to its credit some of the most significant patents associated with batteries used in everyday products such as smart phones, wrist watches, generators et cetera. The publicly traded company is considered to be a crown jewel amongst the giants of information technology and has won numerous awards for, *inter alia*, its corporate governance model and advocacy in favour of ethical practises in corporate management. Since 2005, We Plc. is being run by one Michael Zouzi who acts as its chief executive officer. The de-centralized outsourcing mechanism introduced by Zouzi was able to increase its market capitalization by a substantial margin. A report on the scheme of decentralization developed by Zouzi, prepared by a prominent journalist covering the Wall Street, has been annexed as **Annexure 3**.
13. By 2010, World Electronics was able to establish a holistic supply chain across the world. In anticipation of a major boom in the demand for electronic goods, World Electronics now relied upon thousands of middlemen and liaisons to keep its assembly line running. Right from raw materials to spare parts, most fundamental components of its products were being supplied by a chain of agencies with each entity gaining financial benefits from the momentum gathered by World Electronics. However, as per multiple reports and opinions, little attention was being paid

to the overall human cost of running this “efficient machinery” in terms of basic human rights of the workers who were engaged at the bottom of the barrel and safety of the environment which housed the integral elements to the finished goods being sold. Various reports also highlighted instances of violence being fledged at multiple locations where the local interest and conventions were at cross roads with the economic demand of the concerned raw materials. The same also emphasized the need for the involvement of international and inter-governmental institutions to counter the scant regards shown by the ultimate beneficiary companies towards such instances of violence and disruptions against human life and the environment.

14. By the year 2010, the consumption of consumer electronics had increased substantially across the world. The demand had an obvious and predictable impact on innovation. The race to innovate in the information technology sector brought lithium, an important element in the production and manufacture of batteries, at the centre of attention for most multinational companies looking to expand their market capitalization. In the midst of this revolution, Oceanada found itself in the midst of an unpredictable surge of ambitions. Sarrak de Nova, with its extensive salt content, suddenly came into unprecedented spotlight because of the lithium content present in its reserves. Apart from the abundance of lithium in the crevices of the mountainous region, Sarrak also provided cheap labour for the complex and inherently hazardous extraction process associated with the mass extraction of such a mineral at an industrial scale.
15. However, controversies arose when numerous public reports highlighted the inadequate infrastructure in Nova for any extraction process of such a magnitude. Additionally, the country was also found to be weak in terms of appropriate and robust labour legislations compared to the global benchmarks. Lack of protective measures and policies meant very little to negligible resistance and cost against employers seeking to engage the local communities.

16. In the background of such favourable conditions, numerous companies entered Oceanada's market. In the year 2011, SSB Inc., an international distribution and logistics network and group of companies, opened a local office in Eudaimonia and incorporated a partnership firm registered in Oceanada ("SSB"). By November 2012, SSB, through persistent lobbying and political funding, was able to establish strong connections with the senior leadership of the Liberation Army. These connections helped SSB to gain traction with the local trade unions working in the Corporation including the Liberation Society of Workers. Simultaneously, the partnership firm also increased its shareholding in the top five suppliers of man-power working for Lithensgard.
17. By mid-2013, the Liberation Army had become more assertive than ever in the national politics of the Country. Silent protests had given way to hate speeches against the government. The state was accused of being inconsiderate and insensitive to the plight of the non-Sarrakish citizenry. Lithensgard and the vast majority of land under the Sarrakish population were contentious points on which contentious matters were raised. The patronage received by the tribal communities under local legislations was portrayed as work against the civil and secular nature of Oceanada. The rate of crimes, based on communal reasons, committed against the Sarrakish population increased manifold during the period between July 2013 and December 2017. Additionally, the same period also saw multiple cases of political assassinations both at the federal as well as the local level.
18. By 2014, an environment of fear and uncertainty loomed large over the region of Sarra de Nova. The extant shareholding pattern of Lithensgard allowed firms like SSB to employ their own contractors to extract maximum lithium from the region. As months passed, the heavy machinery and unsustainable techniques used by these contractors, most of whom were volunteers of the Liberation Army, left the region bereft of any identifiable characteristics. The exploitation of the region was coupled with incessant murders, loot and sexual violence against the population of the nearby areas.

19. The most prominent buyer for the lithium was World Electronics. The lithium extracted from the salt reserves was transported across the continent into the United States. With the actual board of Lithensgard being practically reduced to a bystander by virtue of the Eudaimonium Accord, the trade of lithium continued to be formally operationalised by the representatives of ADS.
20. Furthermore, the machinery of this supply chain which made this global distribution possible comprised of a host of factors including both small time traders as well as companies giving logistical support et cetera. The machinery was also tacitly supported by governmental officials, media persons, and police officers. These exploitative tendencies were both the cause and effect of massive corruption in Oceanada.
21. On October 21st 2015, the Prime Minister of Oceanada, Hans Hubberman, was assassinated through a brutal attack on his convoy by an armed militia comprising of certain factions of the Liberation Army. The assassination was widely condemned by the international community. However, the political vacuum created by this assassination paralyzed the government. In the backdrop of this political impasse, the Liberation Army, under the leadership of fugitives such as Egor Hoffman announced the formation of an alternative government based in Sarrak.
22. By December, 2015, the socio-political circumstances in Sarrak had alarmingly aggravated. The Liberation Army had launched a tirade of attacks in and through all the major villages and inhabitations across the mountainous region. Blockades were created on all the routes that connected Sarrak de Nova to the mainland in Oceanada. Every vehicle entering the region was thoroughly checked, taxed, and, if found to be carrying journalists or governmental officials, would be returned or stripped of all belongings which would be confiscated by the militia.
23. The Liberation Army also converted the registered office of Lithensgard into their base camp. This location was used to hold civilian dissidents and political opponents as hostages. The militia also used this base to track the movement of raw lithium across its designated trade routes across

the mountains and to the ports from where payments would be collected by the local mafia. From here, while the lithium and other minerals would be ferried to a small airbase at the foot of the Andes in Peru, the money made its way back to Oceanada into the coffers of cash maintained by the Liberation Army. This cash was then used, *inter alia*, to fund an alternative trade of weapons and ammunitions to defend the territory overtaken by Egor Hoffman and other leaders of the mafia.

24. In the backdrop of these restrictions, the government forces attempted to employ airstrikes on the key hideouts of the ground-level fighters involved in the threat and extortion of the villages in the region. However, such strikes led to multiple instances of major collateral damage in the vicinity. The damage sustained was in turn used by the Liberation Army to further its propaganda. By May 2016, a total of 4000 individuals were displaced, killed or held as hostages and made to work for SSB in the salt reservoirs of Sarrik. An additional 700 volunteers of the Liberation Army were killed in the counter-offensive conducted by the government. Lastly, as per aerial shots obtained by the government, the geology of Sarrik was mutilated to a considerable degree. With the death toll in the region rising every week, various petitions were circulated by international institutions urging the United Nations to step into the conflict and find a permanent resolution to the matter.
25. In September 2016, the United Nations released a press statement condemning the violence orchestrated in the region and urging all the stakeholders to resolve their issues through peaceful methods. Considering the failure of all possible attempts at dialogue, the UN in December, 2016 requested member states to impose economic sanctions on those responsible for the mass atrocities committed in Oceanada. Simultaneously, a joint action task force comprising of soldiers from the neighbouring South American countries was constituted to assist the government in regaining control over major areas of the Sarrik region. With the aid of this joint action task force, the government was able to recapture some strategic regions of the Sarrik

along with the local militia leaders operating from those regions. Domestic prosecutions were launched against some arrested mafia leaders who were directly involved in the plunder of the region and had caused the maximum number of casualties.

26. On March 7, 2017, both Egor Hoffman and Martinez Jose were captured in the international waters while trying to deal in the consignment of lithium and some other conflict minerals. This was a huge setback to the operations of the Liberation Army. Using the opportunity to regain its political traction, Oceanada, a signatory to the Rome Statute, thereafter, formally requested the Office of the Prosecutor at the International Criminal Court (the “**ICC Prosecutor**” or the **“Prosecutor”**) to initiate an investigation against the crimes committed by the Liberation Army and its militia. The ICC Prosecutor was specifically requested to look into the liability of the various contractors and corporate middlemen who, abusing the facade of Lithensgard, were responsible for financing the war crimes – whether directly or indirectly.
27. The ICC Prosecutor, on March 30, 2017, following due procedure given in the Rome Statute and allied Rules and Regulations, opened a preliminary investigation to assess the allegations put forth in the request made by the Oceanada. With the aid and assistance of the Country, the Prosecutor was able to expedite the preliminary investigation. During the course of the preliminary investigation relating to the situation in Sarrik de Nova, multiple individuals were identified as either the key perpetrators or abettors of the crimes covered under the Rome Statute. One such individual was Michael Zouzi. He was sought to be indicted for his participation and contribution towards the indirect perpetration of war crimes in Oceanada through the various channels of corporate entities under the control of We Plc. We Plc. and a host of its affiliates were also heavily criticised by the international community for failing to verify the source of its raw materials and wilfully turning a blind eye towards the violence being perpetrated in Oceanada using its financial resources. In response to the global scrutiny and negative publicity drawn towards the operations of We Plc., the shareholders of the company voted him out of the

management of the company. He stepped down from the position of the chief executive officer and pledged to cooperate in the investigations initiated against him in the United States and the European Union.

28. He also extended support to the investigation being conducted by the ICC Prosecutor while maintaining his innocence throughout the course of investigation. In a press statement released from his office on his last working day in We Plc., he expressed solidarity with the Sarrakish tribe of Oceanada but clarified that neither he nor his company were in any way responsible for the political conflicts in the Country. He also clarified that he was stepping down from all executive positions and was willing to participate in the investigations against him to, “insulate his beloved companies and investors from the libellous news being spread against him and those associated with him”.
29. Based on the material gathered in pursuance of the preliminary investigation, the ICC Prosecutor moved before the Pre-Trial Chamber I of the International Criminal Court (the “ICC” or “Court”) seeking its permission to launch a formal investigation into the situation in Oceanada. The Pre-Trial Chamber, via Order dated October 21, 2018, granted permission to the Prosecutor to investigate the role of various persons involved in the events leading to the situation in Oceanada.
30. Thereafter, on August 27, 2019, the ICC Prosecutor submitted its final investigation report against 5 individuals, including Michael Zouzi.
31. On December 23, 2019, the Pre-Trial Chamber, in accordance with the procedure and conditions given in Article 61 of the Rome Statute, confirmed the charges brought against Michael Zouzi and committed the case to the Trial-Chamber II of the Court (“Trial Chamber”) for committing the war crime of pillage covered under Article 8 of the Rome Statute through indirect co-perpetration.

32. Meanwhile, on June 2, 2019, through the assistance of some local non-governmental organizations, 7 Relacions were able to file an application before the Trial Chamber, requesting the ICC to allow them to participate in the trial against the Michael Zouzi and to make their claims in the reparations proceedings against the same accused. However, the Trust Fund for Victims (“TVF”), assisting these Relacions, took the view that, considering the nature of the offence involved, provisions must also be made to accommodate additional victims who may not have been able to make a representation before the Court for a variety of reasons and disabilities and therefore the reparations sought should be on a lump-sum basis. Thus, in the application filed by TVF on behalf of the Relacions, the following important arguments were extended:
- a) that the Trial Chamber is not duty bound to quantify the exact number of identified victims before the finalization of a reparations award and can elect to pass a collective reparations award under a scheme of leaving all future identification of victims to the TVF;
 - b) that the reparations award, in exercise of the discretion vested with the Trial Chamber, could include un-identified victims and contain an approximate amount of reparation to be awarded; and
 - c) that such approximate reparation must be based on a formula that is aligned with the objective of reparations – restoration and reparation of the harm caused by the accused person [....]
33. Taking note of the application, the Trial Chamber notified both the counsels representing Michael Zouzi (the “**Defence**”) and the ICC Prosecutor and requested the said parties to make their written submissions on the application made by the members of the Relacions.
34. While the Prosecutor extended its support to the application made by TVF, it also emphasised that the Court should not allow collective reparations. In the written submissions filed by the Office of the Prosecutor, it was argued that in the context of the situation in Oceanada, it was

permissible for the Court to reach an exact approximation of the affected victims and therefore, in light of the precedent laid down by the Court in the case of Germain Katanga, the reparation proceedings must be limited to verifiable victims.

35. The Defence, sought to rebut each and every argument made by the Relacions (the “**Legal Representatives of the Victims**” or the “**Victims**”) in their application dated June 2, 2019.

Broadly, the Defence sought to argue that:

- a) the Trial Chamber does not enjoy unfettered discretion in determining the scope, procedure and ambit of reparation proceedings and that the exercise of such discretion must be in conformity with the principles of law prescribed under the Rome Statute, the judgements rendered by the Appeals Chamber of the ICC as well as the settled principles of general international criminal law;
- b) granting a collective reparations award and leaving the future determination of the victims to the TVF would be against, inter alia, the rights of the accused person to a fair trial; and
- c) the formula derived for the quantification of the amount of reparation must necessarily be based on the actual loss suffered by the identified victim and must be proportionately divided between all the accused persons facing trial in the context of the situation in Oceanada [....]

36. The Trial Chamber, considering the written representations made by the Prosecutor and the Defence in response to the application dated June 2, 2019, through a clarification order dated November 2, 2019, allowed the Legal Representatives of the Victims to participate in the trial against Michael Zouzi and requested all the parties to make oral submissions with respect to the application made and the responses given on the basis of the evidence and testimonies to be considered at the trial. Accordingly, the Trial Chamber granted leave to each of the parties to lead evidence and examine/cross examine the various witnesses for the final determination of the guilt or innocence of the accused Michael Zouzi.

37. The Trial of the accused is said to take place on March 15, 2020 in accordance with the official rules and procedure of the 5th Symbiosis International Criminal Trial Advocacy Competition, 2020.

NOTES

- i. All questions pertaining to the jurisdiction, including but not limited to jurisdiction over the charges approved by the ICC shall not be raised by the participants.
- ii. Similarly, no question pertaining to the manner or procedure used for securing the presence of the accused shall be challenged before the Trial Chamber.
- iii. For purposes of the Trial of the accused and all associated and ancillary issues, participants shall solely rely on the facts given in the Competition Compromis under strict application of the principle- "*as is, there is, whatever where is.*"
- iv. The participants are at liberty and encouraged to develop multiple strategies to be used in the different oral-rounds of the Trial. These strategies are expected to be flexible enough to accommodate the choice made by the opponent(s) in terms of witness examination(s) and other similar factor(s).
- v. Notwithstanding anything mentioned in point 4, the memorials submitted by the participants shall cover all aspects of the law as applicable to the factual matrix in the backdrop of the charges confirmed by the ICC.
- vi. Paying due reverence to the theme of SICTA, 2020, the participants are encouraged to understand and showcase the technical nuances of different fictional events that have transpired in the factual matrix.
- vii. Through their oral submissions, the parties in their respective roles are expected to fully appreciate the Rules of Procedure and Evidence used by the International Criminal Court. Additionally, the participants are also encouraged to appreciate and put into use the various principles of evidence law used in various parallel jurisdictions and justify the application of the same in an ICC based trial with cogent reasons.
- viii. The Official Compromis, including all the annexure, is a work of fiction and has been framed with the sole intention of facilitating advanced study of international criminal law and development of professional advocacy skills. The Compromis has no connection, intentional or otherwise, to any historical/political event and does not represent any ideology or affiliation to any political/non-political issue.



WITNESS PROFILES

Note: The various testimonies/profiles forming a part of this Compromis are not to be construed as formal transcripts of the statements given on oath or under any kind of judicial orders by the witnesses. These are mere indicators of the knowledge of the witness regarding the relevant circumstances attached with the subject matter of testimony. However, the participants are at liberty to bring to the notice of the Trial Chamber, instances where the concerned witness testifies against the fulcrum of the witness biography. The Chamber will decide upon the severity and significance of such instances based on the merit of the question(s) posed by the concerned participant during the witness's examination/cross examination process.

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PROSECUTOR'S WITNESS TESTIMONIALS

PW – 1 (PROFILE OF PROSECUTOR'S WITNESS – 1)

Name: Amaavni Cook



Nationality: United States of America

Age: [52]

Occupation: Former investigating officer, Securities Exchange Commission, USA

General Description:

The witness has had an experience of 17 years working in the investigation wing of the SEC. During the course of his career, the witness has investigated multiple high profile white collar crimes and has also contributed to important responsible sourcing legislation(s) such as the Section 1502 of the Dodd Frank Act. The witness intends to assist the Court by highlighting the *modus operandi* used in cases revolving around crimes committed through corporate intermediaries.

Communication:

"The methods of the accused are textbook examples of why shell companies are looked down upon by disdain in almost every civilized jurisdiction. Take the case study of SSB or MZ Capital and they shall check the list of every sign and suggestion of a typical good for nothing sham company. One – almost all of them are incorporated in an unfriendly jurisdiction; Two – almost all of them are incorporated by a corporate service provider or a CSP as the industry calls them. Three – their names will never suggest anything worthwhile about the business objectives or purpose of the company; Four – it's as if these companies do not want to be found; moreover, apart from existing on papers for a good number of years, these companies have little to nothing to show to the regulators. This, in our circle, is called"

a shelf shell company and you've got to be careful about them. Ultimately, it is an individual controlling them and hiding behind the simulation of a separate corporate personality [...] Lastly, unlike the case of SSB, no well-meaning business proprietor today would be willing to issue bearers shares today. Such security instruments have been banned in a lot of countries including the United States. In my understanding, all these are attempts at hiding the ultimate beneficial ownership of a company. [....]

Furthermore, trade in conflict minerals is a very complex web comprising of thousands of agents and middlemen. The concerned minerals, in this case – Lithium, are typically sold to local intermediaries and transported across land borders of transit countries; thereafter, these minerals are passed on to smelters where they may be mixed with other minerals – usually derived from legitimate sources. One penultimate trade-off occurs thereafter when these compounds are then sold off to component manufacturers who, after due processing, finally sell the minerals ingrained in the concerned components to the corporations which assemble and brand the concerned components as a tablet computer or a mobile device. Finally, through another long chain of distributors, wholesalers and retailers, the product will find its place in the common market for the end user's benefit [....]

It is important to understand that all the crimes committed in the process of sourcing the raw materials from underprivileged countries are motivated and instigated by the lure of money given by giant corporations. Therefore, unless some accountability is expected from such corporations, preventing or arresting conflict in conflict ridden areas will continue to be a nightmare.”

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PW – 2 (PROFILE OF PROSECUTOR'S WITNESS – 2)

Name: Matthew Jacob



Nationality: United States of America

Age: [45]

Occupation: Director, Operations Department, and former Chief Operating Officer, WE Electronics

General Description:

The witness was second-in-command to the accused at the helm of affairs in We Plc. He had had a career run in the company – starting from the position of a sales manager in 1985 and rising his way to the top of leadership by the year 2000. During the first quarter of financial year 2005-2006, just when the management of World Electronics was going to announce the yearly promotions, the witness, in a dramatic turn of events, was side-lined due to the lobbying efforts of the accused - who in turn was made the company's CEO instead of the witness. The witness intends to testify against the accused, basing the testimony on his close proximity with the accused in a professional capacity.

Communication:

“Michael has always been the ruthless corporate executive demanded by the Wall Street. His greed and hunger for power, success, and wealth knows no bounds. In more than 10 years of my close association with him, I have never seen him shy away from an opportunity – no matter what its cost. While World Electronics was known for its ideal corporate governance standards and industry benchmarks setting rigorous compliances, the arrival of Michael since 2005-2006, gave us a huge set back in the values the company stood for [...]”

Latin America, and indeed Oceanada, was an important territory for us anyway. However, Michael used his affiliate entities to maximize his personal gains by executing agreements which would route a major chunk of our supply chain from such entities without doing even a semblance of due diligence or objective background checks on those entities. As we later discovered, almost all of those entities were owned between him, his wife and his relatives as the sole shareholders and beneficial owners of those entities. The board, as well as the shareholders of the company, were also kept in dark about the true identity of these identities or the disaster they were bringing in Sarrak.

The company trusted him and he abused our trust. The draft of the resolutions placed before the board for approval, were always widely worded and scantly detailed. The fact that an important whistleblower complaint was not immediately brought to the notice of the board shows this the extent of his involvement in the criminal actions concerned [...] He was always aware that we were being inadvertently and unintentionally dragged into a conflict and he is responsible for designing the conflict he dragged us into [...]"

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PW – 3 (PROFILE OF PROSECUTOR'S WITNESS – 3)

Name: Oliver Santez



Nationality: Oceanada

Age: 57

Occupation: Farm owner and local producer of dairy products

General Description:

The witness is an elder member of the Sarrakish community. He intends to highlight before the Court the torments meted out by the leaders of the Liberation Army on his community and the assets of his ancestors – the reservoirs of Sarra de Nova.

Communication:

"I am a 5th generation Sarrakish farmer. My family and ancestors have always lived in the hills surrounding Nova. The salt reserves of the mountains have always been my community's heritage. Since ages, various national governments have consistently honoured our past traditions and beliefs. Sarra region at Nova represents the most sacrosanct point of our faith in the mountains. We worship the mountains as mother deities and, therefore, to us, the white salty crusts deposited in the area have always symbolized "the milk from the gods." And salt is no less than milk in everyday life. This symbolic ownership has been recognized in the foundational documents of this country as well as the Eudamonium Accord signed with the government. Since my earliest memory, all decisions regarding extraction anywhere near the salt mines was to be initiated only after obtaining a written parchment from the village elders or the Relacion heads.

My own son was a worker in the salt mines under the erstwhile leadership at Lithensgard. But things changed when ADS people joined the company. First when ADS people came, he was forced out of his position and made to work in the administrative department for 1/3rd of the pay he was entitled to. His position and similarly the positions of a lot of other Sarrakish youngsters were filled by goons from the Liberation Army. On April 22, 2012, he disappeared without any trace.



ADS were serving its foreign masters. They were only concerned with increasing their own wealth whereas the promise made by the government to my people was based on mutual respect for the nature in the region. Within months, large machines were brought in [...], armed guards were deployed everywhere. Enormous amount of toxic waste was left open in the area. Our plantation, animals, people, everybody became sick or died.

Those of us who protested either disappeared or were fired from service in the company. I was threatened with dire consequence and was asked to keep quite in exchange for pennies. The police could not do anything to stop the violence. By 2012, there was no peace in the valley. Fear kept us all locked-in and mute, while the foreign missionaries plundered our lands and soil. It will take years to recover the damage sustained by our community.”

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DEFENCE'S WITNESS TESTIMONIALS

DW – 1 (PROFILE OF DEFENCE WITNESS – 1)

Name: Michael Zouzi



Nationality: Luxembourg

Age: 42

Occupation: Former CEO, World Electronics

General Description:

The accused was born and brought up in Luxembourg where he completed his graduation. His family has been a traditional owner of steel mills in the country and continues to enjoy immense prestige and patronage from the country's government. At the age of 23, the accused moved to the United States from where he obtained a master's degree in business administration from a reputed University. After completing his studies, the accused joined a prominent investment bank as an associate. Within a period of 7 years, he was able to amass lucrative executive roles in various important companies – both in the US as well as Luxembourg. In 2003-2004, he was solicited by the World Electronics Group to lead its US operations.

Communication:

"I continue to maintain my innocence with respect to the crime I am accused with. I was neither responsible for nor aware of the actions of the workers in Lithensgard. Contrary to the allegations levelled, in my capacity of a chief executive officer of World Electronics, there was very limited and constrained control exercised by me. All actions of the company have to necessarily be ratified or

approved by the board of directors who function as a majority. Therefore, no individual is responsible for decision making in a company of the size of World Electronics.

I do not know nor have any direct or indirect links to either Egor or the Martinez brothers or for that matter any other person responsible for the situation in Oceanada. It is their internal matter. World Electronics, MZ Capital or for that matter SSB were all operating and responding within the sphere of business exigencies. Pure economics drove our decisions. There was no ill will or any intention to cause any harm to the community there. Infact even the suggestion of the same defies logic. Latin America is not just a source of raw materials but an important consumer base as well. Therefore, any disturbance to civil life in the region is against the interest of the business community. Furthermore, the use of related entities might have led to violation of some specific local regulatory laws but does not constitute a violation of the Rome Statute [....]

Further, any attempt to create an open-ended victim pool will be against my rights before this Court. Every accused person has a right to face his accuser. Any reparation awarded towards unidentified potential victims will violate that right. Further, even on merits this specific case does not warrant a collective reparations award. There is no evidence to state that any one person apart from the limited number of Relacion members were affected in the conflict [....]"

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DW – 2 (PROFILE OF DEFENCE WITNESS – 2)

Name: Shamy Gonsalves



Nationality: Panama

Age: 38

Occupation: Director, Panama Corporate Solutions S.A.

General Description:

The witness is the founder of the CSP responsible for the incorporation of MZ Capital and a host of other affiliate entities owned by the accused. The witness intends to testify in favour of the accused and intends to bring to the Court's attention to the pragmatic utility model served by offshore corporate entities.

Communication:

"My testimony before the Court will be subject to the over-riding confidentiality obligations applicable on my conduct under various agreements and mandates executed between me, my firm and our clients. However, I will nonetheless dispel all myths revolving around corporate service providers and the offshore entities we offer as legitimate products."

A corporate service provider is akin to several other aggregators and platforms existing to bridge the interface between the concerned user and a desired product or service. Our purpose is served in assisting businesses looking to expand in fresh geographies. We do that by advising and assisting clients in various activities which includes, but is in no way limited to, incorporation of special purpose vehicles.

The companies are usually MZ Capital as well as SSB have been created to serve various purposes which are all perfectly legitimate. For instance, some of our clients may consider using these vehicles to serve their tax strategy while others may utilize them for corporate restructuring and mergers and amalgamations. Private clients may also use them for estate planning. Even governments often use the benefit of such entities to hedge their exposures against currency fluctuations. Therefore, there is nothing inherently wrong in the usage of a special purpose vehicle. In fact, the term, “Shell Company” is nothing but an unfortunate misnomer. These companies are a part and parcel of routine business operations across the globalized world and are incapable of aiding or abetting any criminal activity of the scale and magnitude claimed herein.

Lastly, I have known Mr. Michael Zouzi as an honourable man and one of our most consistent patrons. Without commenting on his personal dispositions, I do believe that he is a thorough professional in corporate matters and would never willingly support any illegal organization.”

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DW – 3 (PROFILE OF DEFENCE WITNESS – 3)

Name: Sara Owen



Nationality: United States of America

Age: 32

Occupation: Personal Secretary (former) to Michael Zouzi

General Description:

The witness has worked with the accused for more than a decade. She intends to testify, *inter alia*, on the character of the accused. She also intends to assist the Court in appreciating the hierarchical structure established in World Electronics.

Communication:

"I have known Michael for a long time. I was his first and last under-secretary since he took over as the company's CEO. He is a thorough professional and a law abiding citizen. All his decisions have been in the confines of the law and in the best interest of the company. Infact, under Michael, numerous departments of the company were aligned with the corporate governance norms of the countries we operate in. Furthermore, Michael has promoted ethical business practises in the company's premises and outdoor third-party events. Infact, he is widely respected for taking a tough stand against all instances of corruption in the company. Additionally, he has always dealt with crisis in an adept and holistic manner [....]"

Further, it is to be noted that World Electronics has stakes in more than 100 countries across the world. For a company with such operations, having a purely centralized management structure is impossible. At World Electronics, there are more than a hundred thousand employees. Each employee

is an agent and representative of the company. We have more than 15 subsidiaries operating in various companies. Each subsidiary has a board of directors of its own who are answerable to the shareholders of the company. Our US based company has an extensive public shareholding. And like any other public limited company, the position of a chief executive is limited by a wide range of legal regulations and contractual obligations. The ultimate decision-making authority vests with the board of directors of the company. The board of directors are responsible for overseeing every contractual arrangement finalized by the company.

Additionally, in the capacity of a chief executive, Mr. Zouzi has a very tight schedule in terms of representing and negotiating on behalf of the company. For such reasons, he has been given multiple junior level associates to attend to the bulk of the communications he receives and attend to them on his behalf. Infact, a lot of his electronic communications are done through automated response generation software whenever he is engaged with a prior commitment. His personal entourage is responsible for preparing his weekly schedule in consultation with the managers of the company. At no point in time was he aware of any wrongdoings that may have been committed by any of our suppliers or contractors. The company as such exercises very little to no control over any of its suppliers. Additionally, it is economically very difficult to do a thorough background check on each and every entity involved in our supply chain. This is because of the complex network of suppliers used in the production of consumer electronic products [....]"

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VICTIMS' WITNESS TESTIMONIALS

VW – 1 (PROFILE OF VICTIMS' WITNESS – 1)

Name: [redacted]



Nationality: Oceanada

Age: 55

Occupation: Employee, Postal Services Union, Nova, Oceanada

General Description:

The witness is a member of the Asian community residing in Sarrak. Through his testimony, he intends to assist the Court in identification and reparation of the victims in the Sarrak region.

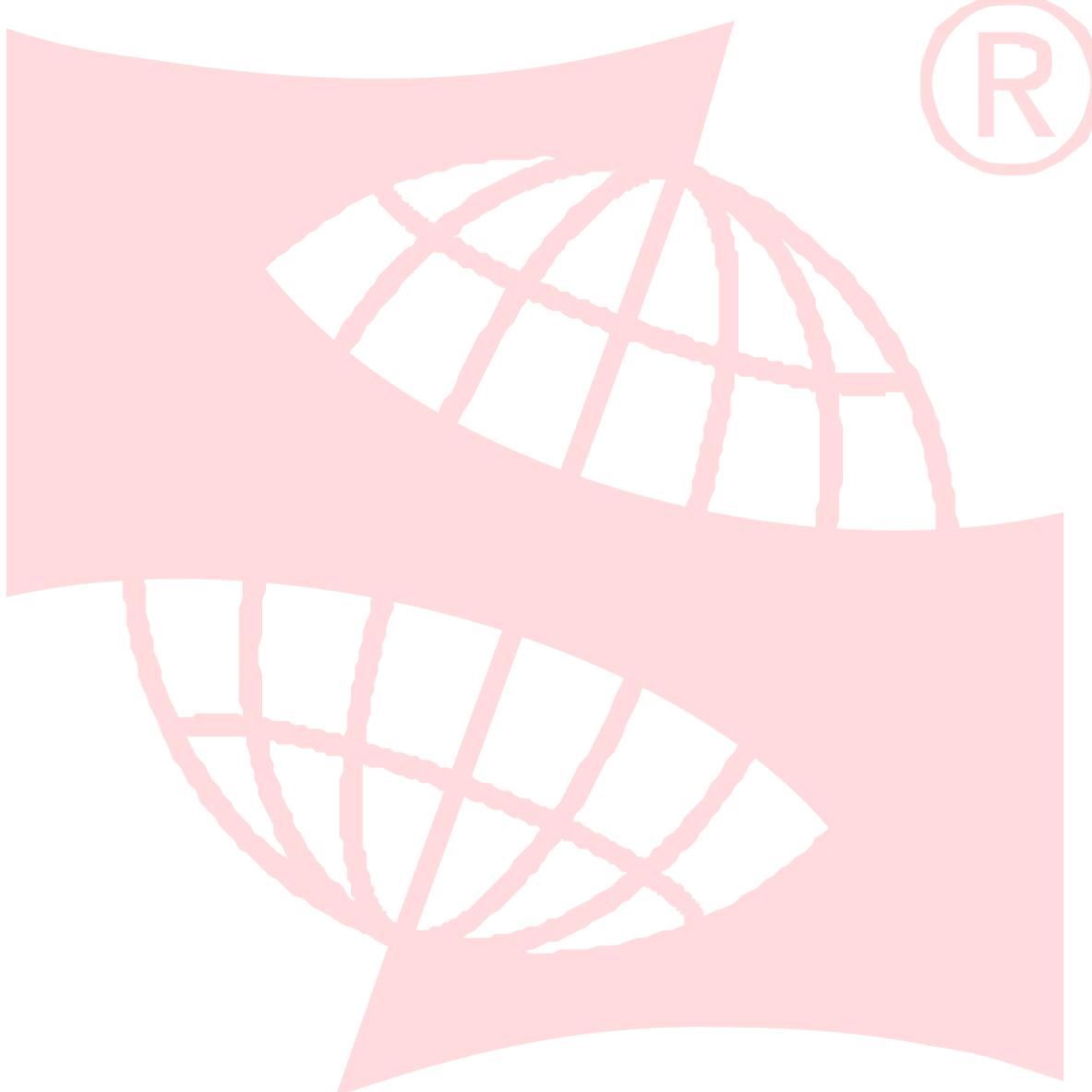
Communication:

[...] The atrocities committed by the militia did not spare anyone. We do not belong to the Sarrakish tribe. But we have many Sarrakish neighbours. Nobody was spared in the violence perpetrated against the population of the region. The mafia had its eye on the prized and revered salt reserves of the area. They were heavily armed and had their own communication systems installed at various locations. Heavily loaded vehicles were used to transport the extracts from the salt mines around the mountains [...]

They have destroyed our main source of livelihood. The loot and plunder of Sarrak de Nova has marginalized the entire community of villagers and farm dwellers into poverty. Moreover, the resultant violence has handicapped Lithensgard forever. Nobody wants to touch that company now [...]

While the gang leaders may have been arrested, the region has been continuously marred by fringe groups re-organizing themselves to gain stronghold over the territory. The lure of the remaining

natural preserves continues to draw more and more gang members from the inland regions to Sarrak. Our lives have been destroyed by the curse brought around by the foreigners. There seems no end to our suffering and the plight of our nature.”



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VW – 2 (PROFILE OF VICTIMS' WITNESS – 2)

Name: Dr. Vassily Davian

Nationality: Oceanada

Age: 55

Occupation: Sociologist, Central University of Eudaimonia

General Description:

The witness is a scholar working with a prestigious university of Oceanada and has authored extensive studies and reports on the conflict situation in the Sarrak region. His testimony is aimed at assisting the ICC in understanding the role of played by multi-national corporations in indirectly funding conflicts.

Communication:

"There is sufficient field research which suggests that large multinational corporations are responsible for indirectly funding conflicts in a lot of countries. Oceanada is one such case. The sociological factors which contribute towards this phenomenon are clearly visible. Scarce employment opportunities, presence of local gangs and cheap domestic weapons, lack of education, and zero knowledge and understanding of the significance of Sarrak. For the young men fighting for the Liberation Army, working for the militia is easy money. They know that demand from World Electronics will never cease; they know that Sarrak is strategically very important to them; and they understand that everyone in between –whether an officer of Lithensgard or MZ Capital – will look after them [....]

Additionally, in our research, we noted that literally anyone could become a worker for these companies. There was no background check conducted. No paperwork was sought from any applicant



at any level of operation. We also noted a pattern developed in the system run and managed by contractors associated with MZ Capital and working for ADS where each local militia leader was incentivised and rewarded for keeping the villagers in check. This led to gross abuse of power and corruption by the miscreants who could easily intimidate anyone who opposed their mechanical activities near the eco-sensitive areas of Sarrak and bribe their way against all attempts to file cases against them. We were also informed that the company officials maintained a safe distance from any illegal activity being done at their behest. Oral commands were given and no journalist or photographer was allowed to inspect the working of the Corporation.

It is also important to note that the violence perpetrated against the people did not differentiate between different communities. The victims, by and large, involved anyone who was based in or around Nova. We are looking at a huge tract of mountainous land with hundreds of small and large hamlets. The extensive damage done to the reserves, the pollution caused in the region, the damage to the soil content, plantations and forest cover in the area has brought all means of livelihood to a halt for thousands of people dependent on the mountains. Thus contrary to the common perception, the number of people affected by the criminal activities in Sarrak, far exceed the handful Sarrakish tribals who could gather independent help in reaching this Court [....]”

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ANNEXURES

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ANNEXURE 1

“[...] According to Professor Wilkin Scharf, Governor of the Central University of Oceanada, “the reason why critics may fail to understand the nuances of the conflict surrounding Lithensgard is because of their unhinged loyalty to the Anglo-Saxon traditions of company affairs where the epicentre of corporate philosophy are indeed the shareholders. Shareholders, thus, become the most important facet of decision making. Whereas, Oceanada has since time immemorial borrowed the stakeholder theory from continental European traditions in both our law as well as policy making. Thus, for a CEO of a company like Lithensgard, as important as shareholders might be in theory, all decision making must also involve consultation and collaboration with stakeholders including the government, employees, customers and the environment. The western world simply does not understand the significance of stakeholders in corporate board rooms.”

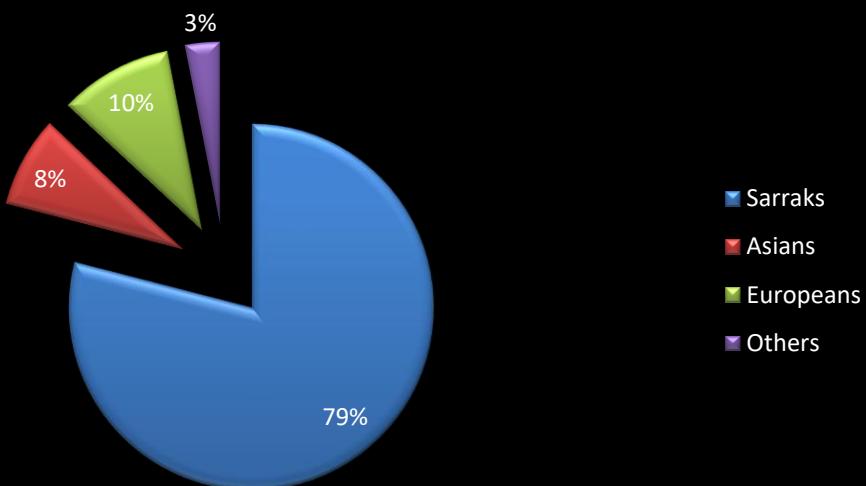
Michael Sanders, a public officer with the ministry of local affairs in the government of Oceanada also echoed the sentiments of Professor Wilkin and added, “[...] the bulk of mythology and folklore of the Sarrakish people personifies the Sarrak de Nova as a gift bestowed on and for the local community. It would not be an exaggeration to say that the salt from the area is intertwined with the blood that flows through tribal life in the region. The government should have been careful in finalizing the reforms and have, at the very least, consulted some representatives of the Sarrakish villages before rolling out its plans.”

Despite the comments made by these two academics, the argument often advanced in the days leading up to the finalization of the economic proposal was that in a globalized economy, no civilized country should allow a state unit to cater to any specific group to the exclusion and disadvantage of others. The argument was further augmented by reference to the lopsided diversity of Lithensgard. While the management of the Corporation was almost entirely overtaken by the heads of various Relacions, the only other members sitting on its board represented the interest of the government. At the employee

level, things looked even bleaker. Right from the head of human resource down till the leader of the local trade union, everything in Lithensgard was pre-disposed towards a temperament sympathetic towards the Sarrakish way of life and thinking.

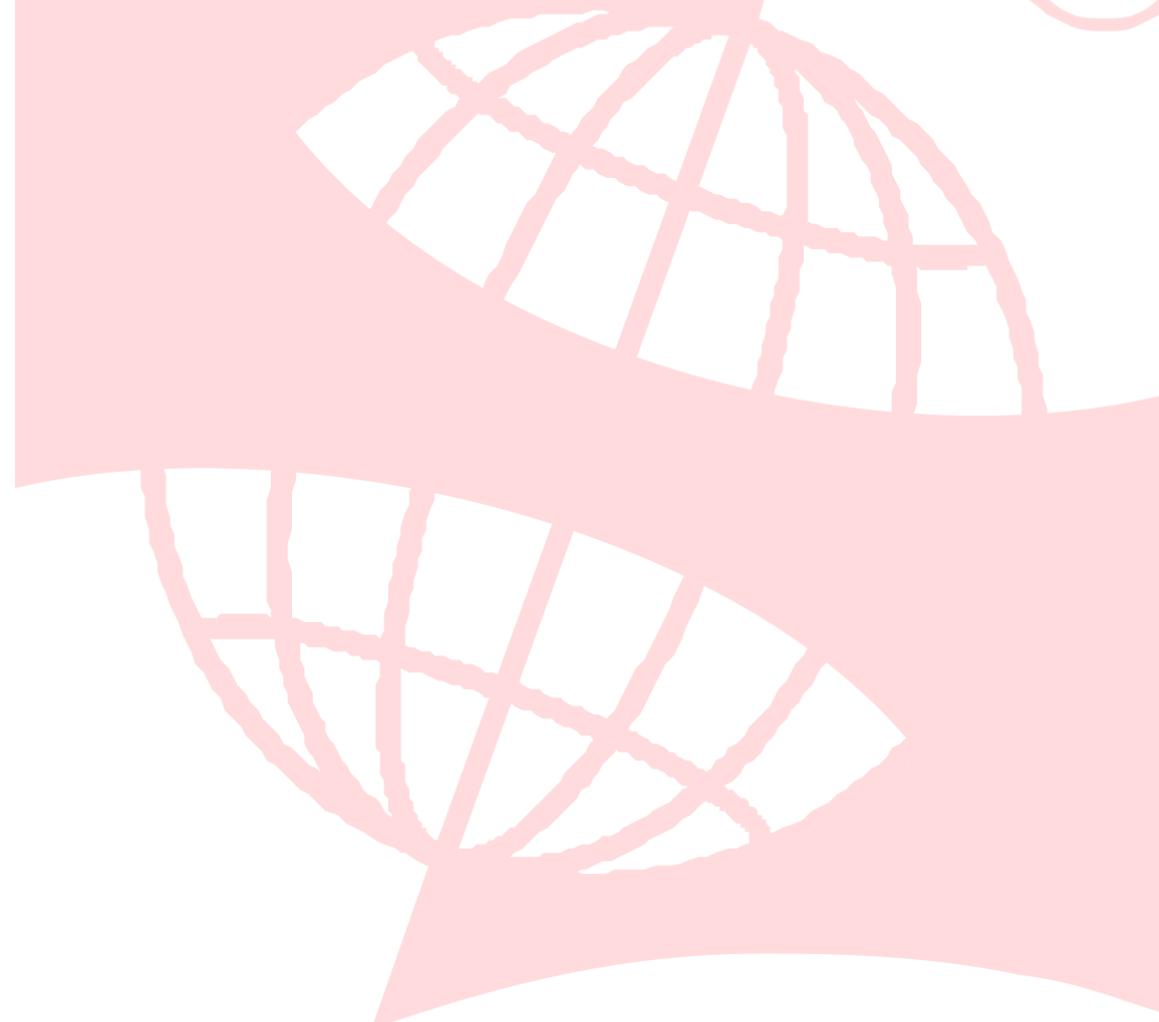
The following diagram represents the employee diversity of the Corporation in the year 2003.

Diversity in Employment at Lithensgard Corp.



It is this skewed ratio that is sought to be fixed by the Liberation Army of Oceanada, or, at least that is what is claimed by the men representing it. This organization boasts of followers and volunteers from all walks of life. Its larger agenda, as per internal memos and pamphlets distributed amongst members, is to, “*liberate the economy of Oceanada from the clutches of mediocrity and foster an era of prosperity and benevolence by hook or crook.*” Theatrics aside, the Army does give indications of holding a wealthy bank account in terms of procuring lucrative funding from various international organizations. Most funding received by the Army is reported under the tag of donations for social causes and accordingly enjoys a liberal tax treatment under the extant tax code of the country.

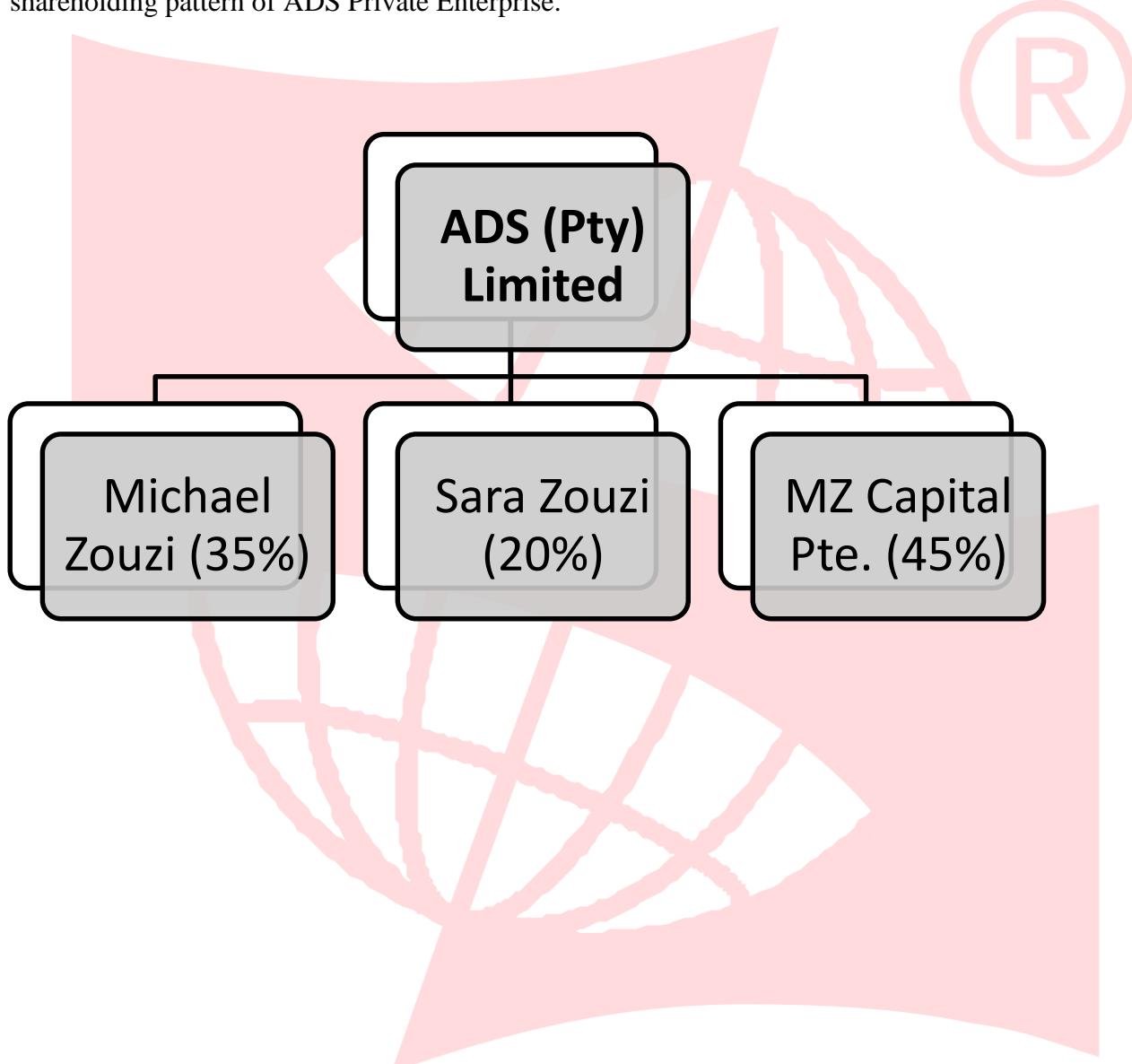
However, recent reports also suggest that the organization is a front for a rogue militia being trained and developed by known offenders such as Egor Hoffman and Martinez Jose. Reports also suggest that certain companies such as MZ Capital Pte. and SSB Inc., owned by Luxembourg based Michael Zouzi, are instigating and supporting criminals like Egor and Martinez to expand their offensive across the country until the government pays heed to the demands of the Army.”



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ANNEXURE 2

The following diagram, as prepared and vetted by the Office of the ICC Prosecutor, represents the shareholding pattern of ADS Private Enterprise.



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ANNEXURE 3

Wall Street's love for (out)sourcing and more [...]

Date: February 14, 2005

Santa Clara, California

[...]

World Electronics, and by imitation an abundance of California based manufacturers, has a new love interest to follow this season – *decentralized outsourcing*. Of course, the term doesn't inspire many notions of romance in its own, but, for management of one of the world's most profitable tech company, the term represents a major overhaul of its inefficient methods of production. In lay man's terms, or for lack of it, the idea encapsulated in the term is basically a departure (and relief) from the loneliness that may come from micro-managing every aspect its supply chain. This relief, for companies, means more working capital to dispense with, and for employees, the ultimate bad news! Yes there shall be downsizing because a lot of work (and associated decision making) regarding the procurement of raw materials which are quintessential for the making of the company's portfolio of electronic products will now be routed through companies such as the SSB Inc., a hundred percent subsidiary of MZ Capital Pte, incorporated in Panama [....]

The strategy to employ relatively unknown firms (more on this later) like MZ Capital Pte seems to suit the appetite of WE's shareholders for expansion and leverage into newer geographic territories, even though the same may fall foul of the securities market regulators in the US and the EU. Even though the company's decision to use such shadow corporations to source raw material from under-developed countries based in South America has raised concerns among the human rights defenders based in the

continent, its flamboyant chief executive Michael Zouzi told this reporter, “[...] WE’s strategy is always in sync with applicable law – whether domestic or otherwise. The decentralization is aimed at reducing inefficiencies in some important product segments. Our PR teams are in constant touch with stakeholders in South American nations to bring any and all necessary concerns to our notice.”

[....]

Be that as it may, our investigations revealed that there is little awareness out in the corporate circles of Panama about the activities or even the existence of MZ Capital Pte. Aside from the obvious signs such as the absence of any dedicated web address, prominent registered physical address of the company, signboards or advertisement whatsoever, the company’s annual filings have also been scarce and timid in detailing crucial information about the company. To make matters worse, its registration has been done by a corporate service provider (CSP) which has been the subject of multiple investigations across different jurisdictions for the deeds of the shell companies opened by the CSP. Lastly, having been incorporated in the year 1993, MZ Capital Pte has been sitting in the shelves for 10 years before being commissioned into service for Zouzi and his affiliates

[....]

However, legality of its operations aside, the utility of such special purpose vehicles is hardly new in the corporate world and has been argued as indispensable to the establishment of a dominion in any new market. What remains to be seen though, is how long before this romantic tryst between major enterprises and shell companies becomes a scandal!

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ANNEXURE 4

Following is the transcript of some emails exchanged between an employee of World Electronics and Michael Zouzi, obtained by the Office of the Prosecutor, with the aid of local authorities, during its investigation into the crimes committed by the accused.

From: operation1@we.in

To: michael.zouzi@we.in

Subject: Regarding the damaging records of Contractor No. 5- MZ Capital

Date: 20 September, 2013

Dear Sir,

This is to bring to your notice that all our previous attempts at bringing the damaging records of Contractor No. 5 – MZ Capital – to your notice have failed. As highlighted in the memo shared with you at your London office via postal order dated July 2, 2013, the on-boarding of Contractor No. 5 into the rolls of the company was done in absolute haste and contrary to the internal policies and guidelines adopted by the company. Additionally, financial reports and monthly trackers suggest that Contractor No. 5 has been diverting the funds given by the company as short term loans and advance payments for some unqualified purchases and mysterious transactions. One instance related to payment of US \$15,000 to title of one Pablo Jose. My department research tells me that Pablo Jose is the brother of Martinez Jose – a known criminal operating in Oceanada. Moreover, the Jose brothers are also linked to illicit weapons trade being conducted in Oceanada. As you are already aware, these funds were strictly earmarked for the procurement of raw materials from South America. However, such transactions have us all worried here in the procurement department. Request you to please look into the situation.

Do let us know if you require any further assistance on the subject.

From: *michael.zouzi@we.in*

To: *operation1@we.in*

Subject: [Re] Regarding the damaging records of Contractor No. 5- MZ Capital

Date: 23 September, 2013

Dear concerned,

Thank you for your email.

I am caught up in the moment with some business trips. Some member of my team will be getting in touch with you soon.

Regards,

Michael Zouzi

CEO, World Electronics

From: Sara Owen <*saraowen@we.in*>

To: operation1@we.in

Subject: With reference to your email regarding the damaging records of Contractor No. 5- MZ Capital

Date: 25 September, 2013

Dear Mr. Li,

This is regarding your email to Mr. Michael dated September 20, 2013. In connection with the matter discussed by you, please be advised that you are no longer to deal with the financial or any other ancillary or incidental filed regarding Contractor 5. Your team's mandate regarding the said contractor is officially terminated. While we thank you for your concern, please be advised that you are to restrain yourself from ever disclosing the contents of your email(s) and/or other communications regarding the subject matter to the public, the press, any employee/associate or contractor working for or with the

company. Such restrain comes from the terms of your employment contract with the company. We would like to inform you that the company views employee indiscretion very seriously.

Further, the management considers all issues concerning corporate relations and PR a top priority. Therefore, going forward basis, you are requested to desist from accessing or procuring the financial memo of the contractors employed by the company. These files will be circulated with the concerned senior managers as per the discretion of the management. Once again, we thank you for your concern and hope that you will take our recommendations into advisement.

Thanks and regards,

Sara Owen,

Under-secretary and Personal Assistant

Michael Zouzi

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ANNEXURE 5

This Internal Memorandum has been obtained by the Office of the Prosecutor through its investigation into the affairs of World Electronics and its officers including the accused. The document has been annexed to highlight the facts and circumstances which aligned the interest of the accused with the militia which operated in the Sarrak region. The Prosecutor intends to rely upon the document to argue that the accused was a co-perpetrator in the crimes being investigated.

*World Electronics Public Limited Company,
Building No. 7,
13th Street, Commercial District
Downtown Delaware*



INTERNAL MEMORANDUM

Subject: Standing instructions to all concerned employees and associates regarding the Company's operations in Oceanada.

Dear all,

Recent reports suggest a heavy slump in our operations in Oceanada. In the interest of the year end targets and long term prospects of the Company, all units working towards procurement of battery related minerals are hereby instructed to revise and review the internal policies, functioning, schedules and man-power allotment as per the following guiding principles:

- (a) All team leaders and managers must effectuate controls and countermeasures to prevent employees, contractors and associates from discussing or exchanging any information related to the operations of our contractors in Oceanada with the members of the press.

- (b) All team leaders and managers must thoroughly redact financial information and ledgers related to Contractor 5 and/or its affiliates before dispensing it or forwarding it to any member of their unit or to a different unit. In this regard, please note that team leaders and managers will be held strictly accountable for a breach of any sensitive information.
- (c) The management is of the opinion that the Company must appreciate the contribution made by political outfits such as the Liberation Army (**LA**) in Oceanda. To this extent, team leaders and managers are requested to accommodate and coordinate with the representatives of the organization in achieving the desired targets in a timely manner. Measures of expected coordination include the policy of minimum interference in the working of the LA in Oceanada, the policy of maximum autonomy to our contractors assisting the LA outfits in Sarrak, timely disbursal and remittance of contractor dues raised through the designated channels et cetera [....]
- (d) The management expects all concerned to act in compliance with these principles.

REGARDS,



MICHAEL ZOUZI

CHIEF EXECUTIVE OFFICER

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WORLD ELECTRONICS