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COMPROMIS¹

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ORDER OF THE PRE-TRIAL CHAMBER I

PRE-TRIAL CHAMBER I of the International Criminal Court (respectively, “**Chamber**” and “**Court**”), in the case of The Prosecutor v. Jules Verne.

HEREBY RENDERS THE FOLLOWING DECISION:

1. Titan

- (a) Titan, a landlocked country, thrives as a unique blend of natural abundance, cultural richness, and economic disparity. Located in the heart of its continent, Titan’s geography is characterized by sprawling rivers, lush forests, and fertile plains. However, the nation’s most defining feature is its abundant hydroelectric potential, derived from the immense river systems coursing through its territory. This gift of nature has made Titan one of the world’s leading producers of cheap and sustainable electricity, fueling its economy and positioning it as a critical energy supplier in the region.
- (b) The nation’s hydroelectric prowess stems from a series of monumental dams constructed along its largest river, the Vola. The Vola is a massive waterway that slices through Titan, fed by tributaries from surrounding highlands. Over decades, the government, in collaboration with neighboring countries, has developed some of the world’s largest hydroelectric projects, including a super-dam. These projects have propelled Titan to the forefront of renewable energy, allowing it to generate far more electricity than it consumes. As a result, the country exports surplus energy to its neighbors, forming a cornerstone of regional energy security and diplomacy.
- (c) Agriculture remains the backbone of Titan’s economy, employing a majority of the population. The country boasts vast stretches of fertile plains, particularly in the northern valley, where farmers cultivate a variety of crops, including soybeans, maize, and wheat. Titan is a significant exporter of agricultural products, with its produce feeding neighboring countries and beyond. Livestock farming also plays a crucial role, with cattle ranching forming a vital part of rural livelihoods. However, much of Titan’s agriculture



remains reliant on traditional methods, leading to disparities in productivity and income between modernized farms and smaller, subsistence-based operations.

- (d) This hydroelectric abundance has translated into some of the cheapest electricity rates globally, providing Titan with a distinct economic advantage. Domestic industries, particularly energy-intensive sectors such as manufacturing, metallurgy, and agriculture processing, benefit greatly from the low-cost power. The affordability of electricity has also encouraged a wave of foreign investment, with multinational corporations establishing operations in Titan to take advantage of its energy surplus. Despite being landlocked, Titan's strategic location as an energy hub has attracted attention from global powers eager to tap into its renewable energy reserves, elevating its geopolitical significance. Despite such historical advantage, the largest sector drawing most foreign direct investment to the country in the recent decade has been crypto-mining. Several foreign entities have set-up base in Titan to use this unique advantage the country offers to undertake mining operations. Complimentary to such operations has been the general advancement in the distributed ledger technological frameworks employed in the country – both in public as well as the private sector.
- (e) It will be apposite to mention that the advancement that came to Titan due to its prowess in generation of hydroelectric power also drew a heavy environmental cost from the country. The construction of large dams and the expansion of agricultural land have led to deforestation, habitat destruction, and displacement of local communities. Indigenous groups, in particular, have been vocal about the loss of ancestral lands and the disruption of traditional ways of life. Additionally, while hydroelectricity is considered a clean energy source, the ecological impact of damming rivers has sparked debates over the sustainability of Titan's energy strategy. Balancing economic growth with environmental preservation remains a key challenge for policymakers in Titan.
- (f) Culturally, Titan is a vibrant mosaic of traditions and influences, reflecting its diverse population. The country is home to multiple ethnic groups including the Scorpions and the Caverns, each contributing unique elements to its national identity. Indigenous communities, concentrated in the forested northern regions, maintain age-old customs and crafts, while urban areas showcase a blend of influences from historical colonization and modern globalization. Festivals, music, and cuisine are integral to Titan's cultural fabric.



- (g) Despite these strengths, Titan faces significant challenges, particularly in bridging the gap between its energy wealth and the socioeconomic reality of its people. Poverty remains widespread, especially in the northern rural areas where access to infrastructure, education, and healthcare is limited. Many communities struggle with inadequate roads, limited irrigation systems, and insufficient public services, despite the nation's economic potential. The energy sector, though lucrative, has not translated into equitable development, with critics often pointing to corruption, inefficiency, and unequal resource distribution as key obstacles. For many, the reality of cheap electricity is a paradox, as they cannot afford or access the benefits of the country's energy bounty. This paradox instead offers a pedestal for non-resident firms to use their capital towards creation of surplus power and repatriate the gains from the production of such power to their home-base.
- (h) Titan's political landscape is shaped by a history of authoritarian rule, democratic transitions, and recurring periods of instability. The government operates under a constitutional framework with a President elected as the head of state, but political power is often concentrated in the hands of a few influential families and business elites, such as the Valours. Public dissatisfaction with corruption and inequality has fueled periodic protests and demands for reform especially between the Scorpions and the Caverns relating to the fear felt by the former in connection with the concentration of power in the hands of the members of the Cavern tribe.
- (i) We note that these specific circumstances form the bedrock of the Situation before us. Whereas, Titan's hydroelectric wealth places it among the global leaders in renewable energy, offering a model for sustainable power generation, yet, the benefits of this abundance have not been evenly distributed, leaving many citizens, especially those residing in the northern mountain ranges, grappling with poverty, inequality, and underdevelopment. At the root of this Situation is the tussle between local communities towards achieving a more just, and egalitarian society.

2. The Scorpions

- (a) Before dwelling on the finer aspects of the Situation, this Chamber will take efforts to record the circumstances of the warring factions to the issue – starting with the Scorpions.



The Scorpion community, isolated in the desolate, unforgiving peaks of the Homroz Mountains in northern Titan, lives in stark contrast to the affluence of the valley below the mountains. These harsh, barren mountains are characterized by rocky terrain, an arid climate, and an acute scarcity of natural resources. The soil is too poor for substantial agriculture, leaving the Scorpions to subsist on meagre yields from sparse terraced farms or foraged wild roots and berries. Water is a constant struggle; the community relies on seasonal meltwater from glaciers or arduous journeys to distant, unreliable springs. Starvation is not uncommon, and malnutrition is rampant among children. Politically, the Scorpions are marginalized, their voices drowned out by the more prosperous regions of Titan. The Chamber has been apprised that the central government of Titan offers little aid, viewing the Homroz as an unproductive hinterland, effectively relegating its inhabitants to a forgotten existence.

- (b) We are given to understand that unemployment is a grim reality for most Scorpions, as the mountains offer no industries and few opportunities for trade or skilled labour. Younger members of the community attempt to escape their dire circumstances through migration to more prosperous parts of Titan, but they often face discrimination and exploitation as outsiders to such newer pastures. Those who remain in the Homroz are trapped in a cycle of poverty that perpetuates disease and despair. With less than 3 (Three) functioning medical facilities in the area, minor illnesses frequently escalate into life-threatening conditions. The community suffers disproportionately from respiratory diseases, exacerbated by the cold, thin air, and lack of proper shelter. There are no entertainment avenues or cultural centers, leaving little respite from the daily hardships. This monotony and despair have led to an erosion of the Scorpions' cultural identity; traditional songs, crafts, and rituals are disappearing as younger generations abandon them in search of escape or survival.
- (c) The despair of the Scorpions is palpable, their lives marked by relentless adversity and a sense of abandonment. Crumbling houses made of loose stones and patched thatch roofs dot the jagged landscape, each a symbol of their diminishing hope. Once a proud people with a rich oral tradition and close-knit communal ties, they now face the disintegration of their heritage. The community laments the loss of their stories and ceremonies, which are increasingly seen as irrelevant in the fight for survival. The youth, burdened by bleak prospects, either flee the mountains or sink into despondency. The Scorpions' plight is a



haunting reflection of inequality in Titan, where geography and governance conspire to shape the destinies of its ethnic communities, leaving some, like the Scorpions, on the edge of collapse.

3. The Cavern Clan

(a) The Community.

- (i) Nestled in the lush valleys surrounding the northern mountains of Titan is a striking example of rural affluence. The Cavern Clan, as the largest ethnic majority group in Titan, owes its wealth to an extraordinary abundance of natural resources that the rugged terrain of their homeland provides. These mountains are rich with veins of precious metals like platinum, alongside deposits of gemstones such as sapphires with extensive supply links to the most coveted watch manufacturers of Switzerland. Fertile soils in the valley are fed by glacial runoff, supporting bountiful harvests of staple crops, exotic herbs, and rare fruits that are coveted across Titan. Over generations, the Caverns have honed their skills in extracting, processing, and trading these resources, propelling them to unparalleled prosperity within the nation.
- (ii) Compared to other ethnic groups in Titan, the Cavern Clan enjoys an exceptional standard of living. While much of Titan grapples with poverty and underdevelopment, the Caverns display a standard of rural opulence that is rare in such settings. This affluence extends to the lifestyles led by members of the community which stands in stark contrast to the lifestyle led by the Scorpions relegated to the extreme weather of the Homroz mountains. The valley also provides access to basic civic amenities typically found in urban centres, including well-maintained schools, clinics, and community halls equipped with modern technologies.
- (iii) The Caverns' dominance over Titan's most coveted resources places them in a position of significant power and influence. Their control over precious metals and gemstones has led to economic dependency; much of Titan's treasury is bolstered by taxes and trade revenues derived from the Caverns' industries. Over time, this control has fostered a quiet resentment among other ethnicities, many of whom struggle with limited access to such opportunities. The Caverns are also keenly aware of their advantageous position and



fiercely protect their resources from external exploitation. Strict community-led regulations govern mining operations to prevent encroachment by outsiders. Even the fertile lands of the valley are guarded by traditional land rights that ensure their community remains the primary beneficiary of the bounty provided by their environment.

- (iv) Despite their wealth and influence, the Cavern community retains a lifestyle deeply rooted in rural traditions. Their economy is predominantly agrarian, with an emphasis on sustainable farming practices passed down through generations. Terraced fields stretch across the mountainsides, meticulously cultivated to grow a diverse range of crops. Livestock, including sheep and mountain goats, roam the pastures, providing wool, milk, and meat. The Cavern Clan are also skilled artisans, crafting exquisite jewellery, tools, and textiles that are highly sought after in regional markets. Their traditional songs and dances reflect the rhythms of rural life, celebrating the cycles of planting and harvest, as well as their connection to the land. Festivals are grand communal affairs, where storytelling and ritual blend seamlessly, reinforcing their cultural identity and shared history.
- (v) The Caverns' unique blend of rural charm and material prosperity sets them apart as a paradoxical community. On one hand, they live in harmony with nature, embracing a simple, unhurried pace of life. On the other, their wealth and influence make them central to the nation's economic and political landscape. This duality is reflected in their worldview: while they take pride in their traditions and autonomy, they are not isolated from the broader dynamics of Titan. In fact, they often leverage their resources to shape national policies, ensuring that their interests are safeguarded. This balancing act of tradition and modernity, of wealth and rurality, defines the essence of the Cavern community, making them one of the most intriguing and influential ethnic groups in Titan.
- (b) The Valours.
- (i) Within the legal corpus of the Cavern Clan exists a sub-division of the ethnicity called the Valours. The Valours are one of the longest surviving and most powerful families of the Cavern. Historically, the Valours were regarded as the kith and kins of the pagan deities worshipped by the Cavern. Their forefathers were honored in community events and enjoyed the highest prestige, power, and dominion in the matters of the Cavern civic life. Questions, disagreements and disputes relating to everyday affairs of the community such



as marriage, divorce, succession, adoption, division, probate et cetera were concluded with dictum issued by the Valours – acting as arbitrators in such matters. With time, the Cavern constructed a legal system around the dynamics between the Valours and the rest of the community – a holistic framework developed around ethnicity, historical practices, moors of the society and customary law.

- (ii) Sometime around 1935, the constitutional framework of Titan also extended recognition and sanctity to the local governance structure prevalent among the Cavern which further consolidated the power and prestige of the Valours. Such a legal recognition continues to operate today.
- (iii) Based on principles of socialism, the Valours were also able to amass a lot of wealth, foreign currency, land and public resources such as churches, marriage halls, schools, inns, taverns et cetera. In total, the Valours are believed to have a total of 13 (Thirteen) pieces of real estate under their dominion of which 9 (Nine) structures were held by them in the name of the community and were used by the clan for various social purposes but operated by the Valour family. In fact, this Chamber understands that ownership or dominion over key real estate was paramount to the hierarchical structure within this community – assisting the Valours in instilling discipline, and fostering a sense of community, traditional values through several generations of the Cavern community. Simultaneously, land also allowed the enterprising members of the Valours to generate and distribute wealth amongst the masses through industries such as tourism, agriculture, entertainment/content creation et cetera.
- (iv) However, as noted by this Chamber in the paragraphs dedicated to study Situation, the very prestige enjoyed by the Valours in the Cavern also printed a target on their backs – for the Valours were looked at as the essential bastion of dogma by the Scorpions. The Valours, numerically estimated to be comprising of 7 (Seven) related households comprising of members from at least 4 (Four) generations with the oldest member a 102 (One Hundred and Two) year old patriarch murdered in the conflict between the Cavern and the Scorpions, are believed to have suffered exceptional harm in the conflict. The Chamber also notes that as on the date of this order, only 2 (Two) households comprising of 5 (Five) Valours remain in the valley. 30 (Thirty) members of the house of Valours are believed to have been killed or are missing due to the conflict as per circulations made by



the local media in Titan. The Chamber also takes note of the assertions made by the accused who, based on reports compiled from the media-outlets registered in the northern mountains of Titan called Homroz, argued that most, if not all, members of the Valour house have in fact defected into western countries like the UK and the US using the material wealth they have accumulated over the years conning the tribal population of the Cavern.

- (v) While the veracity of these allegations and the counter-narratives will be duly tested by the relevant trial chamber during the trial of the accused, this Chamber acknowledges the specific efforts taken by the hostile forces from the Scorpion clan operating in the conflict to target the Valours in the context of the general widespread conflict which marred the two communities during the relevant period being investigated. The armed members of the Scorpions wanted to hunt and/or harm the Valours before the masses – to strategically bring down the morale of the entire Cavern clan.

4. The Accused

- (a) The accused in the present case is one individual called Mr. Jules Verne. He is a 35 (Thirty-Five) year old individual and belongs to the Scorpion community. Public profile of the accused submitted by his counsels and the ICC Prosecutor informs us that the accused has had an illustrious career as a serial entrepreneur in Titan. The accused has won several accolades and recognitions from prominent business associations, lobby-bodies, forums and media channels for building multiple several ventures – each focused on leveraging modern technology in the specific context of Titan to build a suite of software as a service (SaaS) product-line.
- (b) Such sources also tell us how the accused has built a massive fortune by selling his business ventures and exiting from them with a handsome payout. The accused has been often depicted by popular media channels in Titan as one of the wealthiest persons in Titan. We have also been informed that the accused has assets, network and privileges spread across different countries.
- (c) During the relevant period, the accused was the promoter and the CEO of AlphaBeacon LLC, a privately held corporation, established in 2015, which controlled the second largest



crypto exchange in South America. Parallel to his dominion over this entity, the accused is also involved in the capacity of a non-executive director, advisor, shareholder, and/or partner at several entities based in Titan, the United States, Luxembourg, the UK, Singapore et cetera. The accused is also a partner at FlagPole LL a limited liability partnership (operated between the accused and his octogenarian mother) – operating as an investment vehicle, and a market maker for synthetic products linked to some popular commodities indexes in the US and the UK and traded on AlphaBeacon. Additionally, we also understand that the accused owns Titanian Secure Cloud, a rustic but effective blockchain used across Titan and some countries in Asia for a variety of private and public purposes. For the present case, we understand that this cloud service allowed stakeholders to maintain an immutable digital ledger and served a variety of use-cases – with particular emphasis towards assisting technologically challenged small and medium enterprises in Titan and other countries. We will turn to these businesses once again during our discussion on the Situation in Titan.

- (d) The accused is being investigated for several cases registered against him for white-collar crimes, securities fraud, market manipulation, and breach of corporate governance standards in Hong Kong, and Delaware. However, the accused is believed to have faced zero legal challenges in Titan – his motherland due to the weak regulatory framework in the country coupled with what international observers have described to be a corrupt bureaucratic environment. Infact, the availability of cheap electricity in Titan is a crucial reason why the accused, his associates, investors and affiliates continue to stay in Titan – the country offers a fertile ground for power intensive tasks such as mining from a cryptographical perspective.
- (e) The primary allegations against the accused relate to consistent inaction by him against users of AlphaBeacon trading tokens created out of proceeds of crimes committed by members of the Scorpion community against citizens of Titan and against members of the Cavern Clan. The accused is also believed to have allowed the Titanian Secure Cloud (“TSC”) to be used by hostile forces from Scorpion clan to name sensitive targets from the Cavern community and to reveal strategic details of such individuals to practically put a marker on their backs. The modus operandi of such criminal conduct has been covered in the next part of this opinion.



5. The Situation

(a) Context.

The Situation relates to the violence and conflict that erupted between the Scorpion Clan and the Cavern Clan, and which unfolded over an eleven-month period between April, 2022 and February, 2023. Rooted in longstanding grievances over resource exploitation and environmental stewardship, the hostilities spiralled into a devastating cycle of violence, lawlessness, and social upheaval. This conflict not only exposed the fractures within Titan's governance and law enforcement but also underscored the vulnerabilities inherent in its socio-political fabric. This Chamber has tried to capture an informative account of the conflict, its origins, progression, and consequences.

(b) Origins of the Conflict

- (i) As described above, the Scorpion Clan, residing in the arid, mountainous region of northern Titan, has long endured harsh living conditions. Scarcity of resources, limited access to clean water, and chronic poverty have shaped their worldview and fuelled their animosity towards those more endowed in natural resources than the community. They share a deep cultural connection to the mountains, viewing them as sacred and integral to their way of life. In stark contrast, the Cavern Clan inhabits the fertile valley below the mountains, a land rich in natural resources and the primary driver of the region's economic prosperity. In contrast, the Cavern Clan has historically enjoyed significant material affluence in the region.
- (ii) The source of tension between the said communities lies in the Cavern Clan's exploitation of the valley's resources, particularly its intensive mining activities and large-scale deforestation. To the Scorpions, this unchecked utilization was not only an environmental hazard threatening the mountains' fragile ecosystems but also an illegitimate concentration of power in the hands of the Cavern elite represented by the Valours. They believed such practices endangered their children's future and the long-term viability of the region. Over time, the Scorpions' grievances intensified, driven by a perception of systemic neglect by Titan's administrators, which appeared to favour the more affluent Cavern Clan.



(c) Escalation of Violence

- (i) The conflict is believed to have been caused due to the murder of 2 (Two) children belonging to the Cavern Clan by rogue elements alleged to be from the Scorpion community on March 30, 2022. During the course of the same day and the subsequent days, massive amount of misinformation was spread on social media channels distributing hate-filled content targeting the Cavern Clan. These events are believed by the local authorities to have resulted in the first set of confrontation between members of the said communities. However, these incidents quickly escalated into organized violence. The Scorpions launched raids on markets housing Cavern businesses, sabotaging property, and assets worth 10,000 USD. In retaliation, the Caverns mobilized armed groups to protect their operations, targeting Scorpion settlements in punitive raids. The violence soon engulfed the region, with both sides committing acts of aggression against one another. Arson, looting, and targeted killings became commonplace, creating an atmosphere of fear and distrust.
- (ii) Law and order in the region rapidly disintegrated. Local law enforcement agencies, tasked with maintaining peace, were found to be deeply compromised. Many officers, influenced by personal ties or bribes, openly took sides in the conflict, exacerbating the violence. Corruption within these agencies undermined any semblance of impartiality, as some officials profited from the chaos by facilitating smuggling operations or providing protection to criminal elements within both clans.

(d) Humanitarian Impact

- (i) The conflict exacted a severe toll on the region's population. Over 120 (One-Hundred and Twenty) people lost their lives, while 1,200 (Twelve Hundred) sustained injuries, many of which were life-altering. Families were torn apart as 110 (Hundred and Ten) individuals disappeared, their fates unknown. The violence displaced 300 (Three Hundred) families, forcing them to abandon their homes and seek refuge in overcrowded and under-resourced shelters. Reports of 500 (Five Hundred) other acts of violence, including kidnappings, assaults, and sexual violence, underscored the pervasive breakdown of social order.



(ii) The humanitarian crisis was compounded by the handicap of Titan’s government to intervene effectively. Despite repeated appeals for assistance, federal authorities remained (largely) passive, citing logistical challenges and the complexity of the conflict. Their inaction was widely interpreted as a lack of political will, further eroding public trust in the state’s ability to safeguard its citizens.

(e) Economic and Social Fallout

(i) The conflict devastated the local economy. For the Valours, and in turn the Cavern Clan, the valley saw destruction which would require years of reconstruction and at least 3,000,000 USD worth of intervention, in aggregate. Agricultural output in the valley plummeted as farms were abandoned or destroyed. For the Scorpions, already struggling to survive in the harsh mountain environment, the disruption of trade routes and access to valley resources exacerbated their hardships. As per estimates prepared by the government census, integrating the mountains with the rest of Titan would require a minimum of 1,000,000 USD worth of financial assistance.

(ii) Illicit economic activities flourished in the vacuum created by the collapse of formal governance. Proceeds from crimes such as extortion, theft, and smuggling were converted into cryptocurrency tokens by a few members of the Scorpion Clan (and by those sympathetic to the cause of the community), which were traded on Titan’s largest crypto exchange - AlphaBeacon. This shadow economy, enabled by systemic corruption, provided funding for armed groups in Scorpion - perpetuating the cycle of violence. Reports prepared by local law enforcement agencies and collaborated by international observers indicate that the ability of criminals belonging to the Scorpion community to convert and trade fiat currency, other tangible valuables into tokens, list such tokens, and trade them easily, each using the tools offered by AlphaBeacon, is one of the primary causes of the intensity of the violence that resulted in the conflict. It is believed that tokens worth several thousands of dollars were traded by those responsible for the extreme damage caused in the conflict to the Cavern Clan on AlphaBeacon with near impunity and practically negligible friction. As per some commentators, the conflict could have subsided much sooner had AlphaBeacon withdrawn its platform to such illicit use. The use of tokens further complicated efforts to trace and disrupt these financial networks, highlighting the challenges of regulating emerging technologies in conflict zones.



(f) Breakdown of Governance

- (i) The central government's failure to address the conflict revealed significant weaknesses in Titan's political and administrative systems. Efforts to mediate between the two clans were hindered by a lack of trust, both in government representatives and in each other. Proposals for resource-sharing agreements or environmental protections were dismissed as inadequate by both sides, who viewed them as either insincere or unworkable. The government's reliance on local law enforcement, which was already compromised, further undermined its credibility.
- (ii) Another important aspect of the conflict was the use of TSC by highly scrupulous members of the Scorpion Clan to target important members of the Cavern Clan. Such Scorpions would use the TSC platform to update the name, location, and protection around older men, women and children from the Cavern Clan on the blockchain. Once this block of information found its place on the servers, it could be assessed by anyone from anyplace even without constant internet access. Those individuals whose details were uploaded on such servers often found themselves targeted by mobs of Scorpion community members, their homes vandalised and their persons lynched by the crowd. A minimum of 23 (Twenty-Three) people are believed to have lost their lives or property through this method of assault.
- (iii) Civil society organizations and international humanitarian groups attempted to provide relief, but their efforts were often obstructed by the volatile security situation. Some activists faced threats or violence for attempting to document human rights abuses or advocate for peace. Meanwhile, the broader public grew increasingly disillusioned with the state's inability to uphold justice, fuelling unrest in other parts of Titan.

(g) Aftermath of the Conflict

The Scorpion-Cavern conflict remains a cautionary tale of how resource disparities and environmental concerns can escalate into large-scale violence when left unaddressed. The eleven months of bloodshed resulted in profound human suffering, economic devastation, and a lasting legacy of mistrust between the two communities. The region has yet to fully



recover, as reconstruction efforts are hampered by lingering tensions and the absence of a comprehensive resolution.

6. Procedural History and Preliminary Matters

- (a) On March 15, 2023, the government of Titan, as a member of the Rome Statute, requested the ICC Prosecutor to open investigation relating to the conflict between the Scorpions and the Cavern Clan (“Situation”). On June 01, 2023, the Prosecutor released a preliminary report with respect to the Situation referred to it on March 15, 2023 and concluded that the Situation falls within the threshold of sufficient gravity to warrant action by the Court.
- (b) On July 01, 2023, this Chamber, following the due process given under the Rome Statute, authorized the ICC Prosecutor to launch a formal investigation in connection with the Situation in Titan.
- (c) On August 15, 2023, with the assistance provided by the government of Titan, the ICC Prosecutor was able to secure the formal arrest of a total of 27 (Twenty-Seven) individuals, including the accused, to stand trial before the International Criminal Court. These individuals were alleged to have committed the most heinous of crimes in the context of the Situation. As on the date of this order, all the said individuals stand to face their respective trials before the Court.
- (d) This Chamber is presently seized of the case against the accused – Mr. Jules Verne for crimes committed during the period of April 01, 2022 till February 28, 2023.

7. Charge

On August 30, 2023, the ICC Prosecutor filed before the Chamber, the document containing charges leveled against the accused for acts committed during the relevant period. The charge on which the accused is sought to be prosecuted is Article 7(1)(h) relating to, *persecution against any identifiable group or collectivity on political, racial, national, ethnic, cultural, religious, gender as defined in paragraph 3 of Article 7, or other grounds that are universally recognized as impermissible under international law, in connection with any act referred to in this paragraph or any crime within the jurisdiction of the Court,*



read together with the mode of criminal liability provided under Articles 25(3)(c) and Article 25(3)(d) of the Rome Statute.

8. Victim Participation

- (a) This Chamber also had the occasion of perusing the application made by the legal representatives of Valour (“Legal Representatives of the Victim”) on February 15, 2024. The Valours, through the said application, have requested the following from this Chamber: (i) leave to participate in the trial of the accused to assist the ICC Prosecutor in establishing the guilt of the accused; (ii) leave to argue and/or lead evidence that the Trial Chamber designated to conduct the trial of the accused should, in its assessment of the reparations related to the crime committed by the accused, order that the estate of the accused be used to grant individual reparation in favor of the Caverns; and (iii) leave to argue and/or lead evidence on why the Valours should get a priority in distribution of the reparations to be ordered by the said Trial Chamber, each in accordance with the rules of procedure, guidelines of the Tenth Symbiosis Law School, Pune - International Criminal Trial Advocacy Competition, 2025.
- (b) The Valours have requested for a chance to highlight before the relevant Trial Chamber jurisprudence built on the foundation of individualized reparations and waterfall relating to distribution of the reparations, each applicable and to be drawn against the estate of the accused.
- (c) During the proceedings so far, the Valours have made multiple submissions, both oral as well as written, before this Chamber arguing its status as a victim with respect to the Situation being investigated. Appropriate opportunity has been given to the Prosecutor as well as the Defence to make submissions regarding the application dated March 01, 2024. It will also be apposite to mention that the Defence has clarified that it would like to oppose the plea of the victims in this case based on the following broad grounds: (i) the accused doesn’t have the necessary resources to address any potential reparations ordered by the Trial Chamber; (ii) connected to the said point, any alleged resources considered by the victims is infact a community resource; (iii) simultaneously, the correct form of reparations to be potentially considered by the Trial Chamber in the present case should relate to collective reparations to be made in favor of all persons impacted in the Situation; and (iv)



this case does not warrant the establishment of any priority of distribution of reparation(s) in favor of the Valours.

- (d) The Chamber, after due consideration of the relevant provisions, including, Articles 57(3)(c), 67(1), 68(1) and (3) of the Statute, Rules 85, 86, 89, 90, 91 and 103 of the Rules of Procedure and Evidence and Regulations 24(2), 80 and 81 of the Regulations of the Court, admits the applicant as the Legal Representative of the Victims to the proceedings in the case against the accused.
- (e) Further, based on due regards to the principles of the Rome Statute and public international law, and based on the merits of the application made by the Legal Representatives of the Victims, also grants the Legal Representatives of the Victim leave to make arguments relating to the grounds covered in the said application.

9. Findings of the Chamber

For these reasons, this Chamber hereby:

- (a) **Decides**, that it has jurisdiction over the present case and determines that the case is admissible.
- (b) **Decides**, to confirm, pursuant to Article 61(7) of the Statute, the charge presented by the Prosecutor against the accused to the extent specified in paragraph III of the present decision and to **COMMIT** the accused to the Trial Chamber for trial on the charge as confirmed.
- (c) **Transmits**, this decision and the record of the proceedings in the instant case to the Presidency pursuant to Rule 129 of the Rules.



WITNESS TESTIMONIALS

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 the testimony to be given before the Trial Chamber. However, the participants are at liberty to bring to the notice of the Chamber such 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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ICC PROSECUTORS WITNESS - TESTIMONIALS

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PW – 1 (PROFILE OF PROSECUTION WITNESS – 1)

Name: *Chein Klix*

Occupation: *Former Director, AlphaBeacon LLC*

Nationality: *Titanian*

Age: *42*

General Description:

The witness served as a director at AlphaBeacon LLC for six years before stepping down in 2022 due to ethical concerns. During his tenure, he was privy to the operations and governance of the platform, which he later identified as being systematically misused under the leadership of the accused. He witnessed firsthand how the organization's decentralized facade masked a highly centralized and opaque decision-making process. His testimony highlights the organization's role in enabling financial crimes, including facilitating transactions tied to acts of violence during the Scorpion-Cavern conflict. After leaving AlphaBeacon, he committed himself to advocating for stricter compliance and governance practices, taking on a leadership role at another Titanian exchange.

Communication:

“My name is Chein Klix. I appear before you today as a former director of AlphaBeacon LLC, a position I held for six years. My testimony is with the express purpose of exposing the illegal and unethical practices perpetuated by Jules, who operated AlphaBeacon LLC as his personal fiefdom. I share this account not out of malice but as a responsibility to the global community and to the truth.

AlphaBeacon LLC was, in theory, established as a groundbreaking exchange with state of art tech. We ran it on principles of transparency and accessibility. In practice, it was anything but. Under his leadership, the company was a centralized power structure disguised as a decentralized operation. Decision-making was monopolized, disagreements were silenced, and accountability was a joke.



Jules did not run AlphaBeacon as a corporate entity but as an extension of his will. Every major decision was filtered through his personal interests, often to the detriment of legality and ethics the crypto community holds dear. How often will you find a situation where a truly serious business can operate without its CEO having some kind of employment agreement with the employer? Jules could not be persuaded by the board for the love of God! He would operate without a contract – being guided by the charter docs alone.

Even before the conflict, it became clear that the exchange was being exploited by criminal actors. Alleged arms dealers, narcotics traffickers, and even organizations involved in ethnic violence funnelled their operations through AlphaBeacon. The anonymity afforded by cryptocurrency was their tool, but it was Jules's deliberate inaction—and, I must emphasize, his intentional inaction—that provided them with a haven. He created an environment where these transactions were not merely overlooked but encouraged by omission. His motives were twofold: profit and power. Profit in the Company – for his pocket and that of his shareholders. Power amongst the important people of Scorpions. He understood that the violence and chaos facilitated by the misuse of AlphaBeacon's platform led to increased trading volumes. These transactions generated exorbitant fees, padding the company's financials and enhancing its market share. AlphaBeacon's growth—hailed as meteoric by the press—was fuelled by blood money.

But that is not all. Jules also benefited from the perception that he was a protector, a white knight in dark times for Scorpions. Titan, his home base, is rife with tension. Scorpions and Cavern Clan often find themselves at odds with one another. Jules exploited the perverse narrative that his platform provided financial tools to his people to protect them from their oppressors. In truth, the violence bolstered his platform's reputation as essential, ensuring loyalty and unchallenged reverence among his supporters.

Within the walls of AlphaBeacon, it was no secret that the platform was a conduit for laundering money and perpetuating violence. Employees whispered about it in hushed tones. Contractors knew better than to ask questions. The leadership team—myself included at the time—was painfully aware of the illicit activities facilitated by our systems. Yet, Jules enforced a strict code of silence, cloaked under the guise of Company PR.



Any breach of this code was met with swift retaliation. Employees were terminated for raising concerns, contractors were blacklisted, and the accused personally ensured that dissenting voices were silenced through intimidation or legal threats. He had the blessings of the shareholders with him.

Titan's jurisdiction provided a fertile ground for such exploitation. Its laws on financial oversight were toothless, and its regulatory bodies, where they existed, were more concerned with optics than enforcement. Titan's lack of serious (KYC) requirements made AlphaBeacon a playground for criminals. Jules showed utter disdain for the principles laid down by the FATF, openly mocking their recommendations in private meetings.

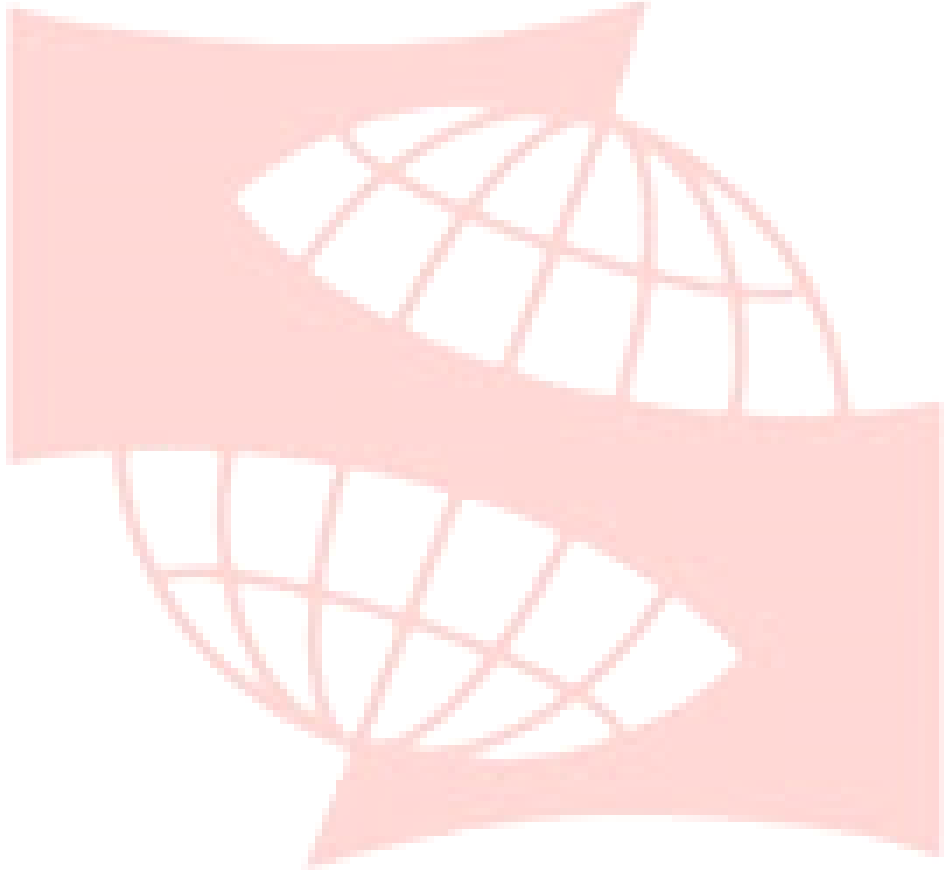
The Company's internal governance was similarly laughable. Investor-shareholders, blinded by the staggering profits, wilfully ignored governance lapses. Lenders applauded him for his "innovative approach" whenever questions arose about compliance. In essence, AlphaBeacon operated in a bubble of unchecked power, shielded by weak laws, an apathetic regulatory framework, and a complicit board. Titan's regulatory weakness, Titanian Secure Cloud, fondly called TSC among enthusiasts, and AlphaBeacon together formed the holy source for Jules to fund his real baby – his hedge fund – FlagPole. You see, all the wealth generated from TSC and Beacon ultimately decorates the coffers of FlagPole.

After six years, my conscience could no longer bear the weight of my complicity. I left the organisation in 2022. I have since taken on the role of heading the finance department at Titan's second-largest exchange, a position I use to advocate for stricter compliance standards and greater transparency.

I stand before this court not as a perfect man but as someone determined to make amends. By testifying against Jules and AlphaBeacon LLC, I hope to shine a light on the corruption that has plagued Titan's financial systems and contributed to the cycle of violence in our world.

The world should know that Jules's actions have had far-reaching consequences. The criminal misuse of AlphaBeacon's platform has funded and perpetrated massacre of several people, torn communities apart. This is not merely a case of financial misconduct but a matter of life and death for countless individuals. The accused is not a protector; he is an enabler. The company he built on the foundations of chaos and bloodshed must be held accountable. I urge

this court to consider the weight of this testimony and to deliver justice—not just for those of us who have suffered in silence but for the world at large.”



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PW – 2 (PROFILE OF PROSECUTION WITNESS – 2)

Name: *Leo T.*

Occupation: *Cyber-Forensic Specialist, Titan Police Department*

Nationality: *Titanian*

Age: *38*

General Description:

This witness is a cyber-forensic specialist affiliated with the Titan Police Department. His expertise in blockchain technology was crucial during the investigation into the misuse of AlphaBeacon LLC and the Titan Secure Cloud (TSC). He examined how TSC, a blockchain platform, became a tool for perpetuating violence by enabling the dissemination of sensitive information about individuals targeted during the Scorpion-Cavern conflict. He also analyzed the role of AlphaBeacon in facilitating financial crimes through cryptocurrencies linked to the conflict. Despite institutional limitations, the witness played a significant role in uncovering systemic issues that allowed these platforms to operate with minimal oversight. His perspective provides valuable insights into both the technological misuse and the regulatory shortcomings in Titan.

Communication:

“My name is Leo T., and I serve as a cyber-forensic specialist attached to the Titan Police Department. Before this esteemed court, I appear to provide testimony on the role played by the accused, in creating and maintaining a platform that has caused untold destruction in our region. My testimony is not merely a professional account of the events but also a reflection of the institutional failures that have enabled this tragedy.

Before addressing the specifics of the case, the court must understand the context in which these atrocities occurred. Titan, as a jurisdiction, is exceptionally weak in its capacity to enforce laws, particularly those concerning white-collar crime and emerging technologies. The police department to which I am attached lacks even a rudimentary understanding of blockchain technology. We continue to show poor institutional capabilities in understanding cryptography, let alone comprehend how such systems can be weaponized. Despite these



limitations, our investigation uncovered a chilling truth: the accused, a man of substantial technical expertise, knowingly allowed TSC to become a tool of violence and destruction.

TSC was deceptively simple in its design. It lacked the complexity of mainstream blockchains but compensated for this with its accessibility. Its lightweight infrastructure and low resource requirements made it operable even in the most remote and technologically deprived areas. Please take some effort to grasp the significance of this: TSC did not require consistent internet connectivity, advanced hardware, or significant technical knowledge. In the hands of the Scorpion tribe, it became a weapon more potent than any gun or explosive.

The Scorpions used TSC to log sensitive details about their targets—often the families of the Cavern ethnic group. For example, when a Cavern family travelled along a highway, isolated and vulnerable, this information would be entered into the TSC. The information was accessible, trustworthy, and immutable. Within hours, swarms of Scorpion fighters would intercept the family. What followed was either public lynching or the grim realization that their home had already been burned to the ground.

To reiterate, the most insidious aspects of TSC is its simplicity. This platform was not used by engineers, scientists, or finance professionals. It was wielded by rural, untrained individuals with minimal education. The accused, however, was a trained professional—a man of significant intellectual and technical prowess. He knew precisely how his creation could be exploited and chose to do nothing, or at least so we expect.

The court must recognize the perverse ingenuity of this design. By creating a blockchain that was so accessible, the accused ensured that even the most technologically unsophisticated individuals could weaponize it. The platform's low barriers to entry turned ordinary tools of record-keeping into instruments of terror.

*Despite our relative handicaps, my department did its best to check the accused. When our investigation revealed that the accused had opportunities to mitigate the damage caused by TSC, we attempted to intervene. A formal legal notice was issued to him dated **November 15, 2022**, requesting his cooperation in investigating the misuse of TSC. I acknowledge that the notice was flawed—it lacked the lawful sanction of a magistrate and thus had no binding authority. However, it represented a good-faith effort to address a dire situation. The accused*



should have taken it and honoured it – in good faith. I must also clarify that Titan is very clear on its zero tolerance policy for such crimes - we are already working on the indictment of all corporate entities in which the accused has some interest. Infact, FlagPole and AlphaBeacon are both all but dead through a series of injunctions, attachments, and freezing of their respective bank accounts initiated by our regulators under our municipal civil and criminal jurisdiction and have little to no scope of recovery in the near future.

Instead of cooperating, the accused ignored the notice. He could have taken steps to suspend operations in Titan, disable the platform, or at the very least restrict its features. He did none of these things. He sat quietly, looking the other way, while the platform he created enabled unspeakable atrocities.

The consequences of the accused's inaction are not abstract or hypothetical. They are stark, brutal, and painfully real. TSC became a mechanism for targeting, tracking, and terrorizing vulnerable communities. Entire families were wiped out; homes were razed to the ground. The number of direct and indirect deaths facilitated by this platform is staggering. These are not mere statistics; they are lives lost, futures stolen, and communities destroyed.

The accused cannot claim ignorance. He cannot claim helplessness. His silence and inaction were choices—choices that enabled the continued use of TSC as a weapon of destruction.

The Scorpion tribe may have wielded TSC, but the accused placed the weapon in their hands. He designed it, deployed it, and refused to disable it even when it became a tool of genocide. TSC was not just a platform for communication; it was a real-time execution tool, a digital accomplice in atrocities that claimed countless lives. The accused may not have wielded a weapon, but the system he built became one of the deadliest weapons in the conflict.”



DEFENCE WITNESS - TESTIMONIALS

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DW – 1 (PROFILE OF DEFENCE WITNESS – 1)

Name: *Jules Verne*

Occupation: *Former CEO of AlphaBeacon LLC*

Nationality: *Titanian*

Age: *35*

General Description:

The accused is a former entrepreneur and the CEO of AlphaBeacon LLC, which he co-founded in 2015. He is known for his significant influence in the cryptocurrency space, building one of the largest exchanges in Titan. Despite his professional accomplishments, he faces allegations of enabling financial misconduct and violence by allowing his platform to be exploited during the Scorpion-Cavern conflict. Under his leadership, AlphaBeacon is accused of failing to implement necessary safeguards, allegedly facilitating the funding of violent activities. The accused is also linked to the misuse of the Titan Secure Cloud (TSC), which enabled the targeting of vulnerable individuals. His actions and inactions are at the center of the current trial, where he is charged with enabling persecution against identifiable groups.

Communication:

“I stand before this court accused of grave offenses—offenses that I unequivocally deny. This trial is not a pursuit of justice; it is a political hunt, orchestrated by the powerful communities of Titan, such as the Valours, to crush the spirit of my people and to dismantle the advancements we have made. I ask that the court carefully consider the broader context of these accusations and evaluate the situation with fairness and logic rather than succumb to the moralistic fervour driving this case.

Much has been said about TSC, a blockchain platform, and AlphaBeacon LLC, a cryptocurrency exchange, both of which are owned and controlled by companies—not by me personally. I am but one individual in a structure governed by shareholders, boards, and legal frameworks. A company is inherently designed to seek business opportunities and maximize profits; this is neither illegal nor immoral but the very essence of its purpose.



While I understand that some may look down upon profit as a “dirty word,” I trust that this court will adopt a rational perspective. Profit maximization is not a sin, nor is it a crime. It is the driving force behind innovation, progress, and the creation of platforms like TSC that have helped democratize access to technology and financial systems in ways previously unimaginable.

Blockchain technology operates on the principle of decentralization—a democratic ideal at its core. TSC was designed to empower its users by removing central authority, ensuring that no single entity or individual, including myself, could unilaterally control or manipulate its operation. I want to repeat this statement once again – the nodes of TCS make it happen. A Jules Verne is helpless and powerless before the collective decision of the nodes.

By design, blockchains like TSC are self-regulating and immutable. The architecture ensures that I could not have intervened to alter its course or prevent certain transactions, even if I had wanted to. This is the strength of blockchain and its value proposition to the world. To suggest that I wielded control over how individuals used TSC is to misunderstand the very technology on trial here.

AlphaBeacon LLC, like any cryptocurrency exchange, operates as a neutral platform. We do not, and indeed cannot, discriminate between users based on their intentions, provided they meet the legal requirements for onboarding under Titan’s municipal laws. We can react to intentions or actions only after local laws direct us to act against such actors – and Titan did not.

It is important to emphasize that not a single instance of breaching Titan’s laws has been brought against me or my company. We have operated with full compliance and unwavering obedience to the regulations of our jurisdiction. To expect me or my company to adhere to foreign laws—laws that may not even be accessible to us or relevant to Titan—is not only unreasonable but also unjust.

Moreover, the suggestion that I, or AlphaBeacon, should have taken on the role of law enforcement is fundamentally flawed. It is not, and has never been, the responsibility of a business to police the conduct of its users. Our role is to provide a service, not to monitor or impose moral judgments on the personal conduct of those who use our platform.



Imagine, for a moment, a world where every SaaS provider is required to monitor how its clients use their products. Imagine a world where service providers are expected to impose their value judgments on their users and intervene if those users act in ways contrary to the provider's beliefs. Such a proposition is absurd and would lead to a chilling effect on innovation and technological progress.

TSC, like any other platform, is a tool. Tools are neutral by design; their morality lies in how they are used by individuals. A piece of iron can build a home or break a window, but you cannot fault the ironsmith. Similarly, AlphaBeacon, or its management cannot and should not be held responsible for the personal conduct of its users – especially given the circumstances where suddenly subscribers of a particular community serenade your platform in large numbers trading tokens relating to land, gold, precious art etc.

I would also like to respond to the controversy relating to the notice shared by the police. Firstly, I did not receive any notice personally. Secondly, this notice was not legally binding. Like any responsible person, someone from the Company sought the advice of our internal legal team. Their assessment was unequivocal: the notice lacked legal sanction and was thus untenable. Based on this advice, we chose not to act on the police's request.

I must stress that this decision was not made out of defiance but out of adherence to the rule of law. It is unfair to expect me, or anyone else, to comply with a request that has no legal basis. To hold this against me is to ignore the fundamental principles of justice and due process.

This trial is about far more than the allegations against me. It is about the politics of power and suppression. The Valours and other mighty communities of Titan have long sought to marginalize and silence my people. My work with TSC and AlphaBeacon has been a beacon of hope for those who have been disenfranchised and left behind by traditional systems.

I have dedicated my career to creating platforms that democratize access to technology and financial systems. I reject the narrative that my work has been a force for harm. Instead, I ask this court to recognize it as a force for progress and empowerment.



I stand here accused of crimes I did not commit and could not have committed. TSC and AlphaBeacon are technological platforms—not weapons of destruction. They are governed by principles of decentralization and neutrality, and their misuse by certain individuals does not indict me or my company.

To hold me personally accountable for the actions of others is not justice; it is a miscarriage of justice. I trust that this court will see through the political motivations behind this trial and deliver a verdict based on reason, fairness, and the rule of law.”



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DW – 2 (PROFILE OF DEFENCE WITNESS – 2)

Name: Sarah Volmer

Occupation: Former Operations Officer, Titan Secure Cloud (TSC)

Nationality: Titanian

Age: 39

General Description:

Sarah Volmer served as an operations officer at Titan Secure Cloud (TSC) during its critical years of development and implementation. She worked closely with the accused, Jules Verne, and provides insight into the platform's intended purpose and operations. Sarah testifies to the technical features of TSC, emphasizing its design as an accessible and efficient blockchain technology intended for legitimate uses, such as maintaining immutable records for businesses and under-resourced communities in Titan. She argues that the accused had no direct control over how users employed the technology once it was deployed and that the misuse of TSC during the Scorpion-Cavern conflict stemmed from external factors, such as weak regulation and malicious actors. Sarah defends the platform's initial purpose, pointing to its utility in promoting transparency and economic development. Her testimony aims to counter allegations of the accused's complicity in enabling violence, highlighting the broader socio-political context and lack of oversight that allowed misuse to proliferate.

Communication:

“I appear before this court as a former shareholder of AlphaBeacon LLC and as someone with professional expertise in corporate governance and law. Let me begin by clarifying that I exited the company in 2019, years before many of the alleged events took place. My relationship with AlphaBeacon ended at that time, but I am here to offer insights into the workings of a modern corporation and to address the deeply flawed premises underpinning this trial.

This case, as it stands, seems to proceed on an outdated or fundamentally flawed understanding of corporate governance in the modern era. A professionally managed company, like AlphaBeacon LLC, operates within a sophisticated framework of checks and balances designed



to prevent unilateral decision-making or abuse of power by any single individual, including the CEO.

Corporate governance is built upon multiple layers of rights and obligations, which ensure accountability at every level of the organization.

At the foundation of every company are its charter documents—articles of incorporation and bylaws, for instance. These documents define the powers and responsibilities of each individual and entity involved in the company’s management. They dictate the ambit of authority granted to the CEO, the board of directors, and shareholders. At AlphaBeacon, as with any other professionally run company, these documents ensured that no single person could act without oversight.

Beyond the charter documents, the employment agreements of key managerial personnel like the CEO further limit their authority. These agreements specify the scope of their duties and establish accountability mechanisms to make them answerable to the board of directors and, ultimately, to the shareholders. A CEO is not a sovereign ruler; they are an employee bound by these agreements.

The final layer of governance comes from internal policies and practices—general rules that address gaps left by formal laws or agreements. These policies are critical in ensuring that every decision aligns with the company’s values and regulatory obligations. At AlphaBeacon, such policies were deeply ingrained in the culture, providing a comprehensive framework of accountability.

The notion that Mr. Jules operated AlphaBeacon as his “personal fiefdom,” as has been suggested, is fundamentally inconsistent with how modern corporations function. Industry-wide, no self-respecting investor would allocate a single dollar to a company that lacked near-perfect governance standards. Private equity investors, in particular, are notoriously stringent about governance.

Titles like CEO may sound impressive, but in practice, they are accompanied by significant restrictions and oversight.



The CEO's actions are constantly scrutinized by the board of directors and the investors. Decisions, especially those with material consequences, require board approval unless such decisions have been ordered by the board. If a CEO were to disregard the expectations of investors or bypass the board, the company would face immediate backlash. Investors would walk away, and the company's credibility would collapse. Mr. Jules, like any other CEO, was acutely aware of these realities and acted accordingly.

CEOs are not involved in the day-to-day operations of a company. Tasks like compliance checks, sales processes, and customer onboarding are handled by specialized teams. It is illogical to expect that a CEO would personally review or approve each transaction conducted on a platform as large and complex as AlphaBeacon. Such expectations betray a fundamental misunderstanding of corporate hierarchies and operational realities.

Even if nefarious activities occurred using tools developed by the company, the CEO's liability is qualified. For liability to attach, it must be proven that the CEO had actual knowledge of such activities or acted with intent to facilitate them. Absent clear evidence of such knowledge or intent, the responsibility falls elsewhere—starting with the investors, who ultimately exercise significant influence over corporate priorities.

This case must also consider the unique circumstances in which AlphaBeacon operated. The court cannot ignore that Titan was, and remains, a deeply volatile region. In such an environment, expecting Mr. Jules to act against the interests of his own safety is unrealistic. Why would he—or anyone else—put their life at risk to address conflicts that were far beyond his control? Moreover, the suggestion that Mr. Jules should have terminated services or proactively intervened in user activities ignores the inherent dangers of such actions. The consequences of perceived favouritism or discrimination in a conflict zone could have been catastrophic, both for Mr. Jules personally and for the company.

I urge this court to recognize that Mr. Jules was not operating in a vacuum. He was navigating a complex, dangerous, and unpredictable environment. His decisions, whether to comply with flawed notices or to continue operations, were made in good faith and with the understanding that his primary duty was to the company and its stakeholders—not to unverified allegations or external pressures.”



VICTIM WITNESS - TESTIMONIALS

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VW – 1 (PROFILE OF THE LEGAL REPRESENTATIVE OF THE VICTIMS – 1)

Name: *Dominic Valour*

Occupation: *Artisan and Community Elder*

Nationality: *Titanian*

Age: *67*

General Description:

Dominic Valour is a respected elder of the Cavern Clan and a skilled artisan whose family was deeply affected by the Scorpion-Cavern conflict. He recalls the displacement of his community, the destruction of centuries-old artisanal workshops, and the loss of cultural artifacts that were integral to the identity of the Cavern people. As a survivor, he details the events leading to the targeting of Cavern Clan members, including how their locations and movements were tracked through Titan Secure Cloud (TSC). Dominic recounts the personal loss of his family members during violent attacks and the long-term impact on his livelihood, as the destruction of workshops disrupted their traditional crafts. His testimony highlights the profound cultural and economic devastation experienced by the Cavern Clan, attributing part of the responsibility to the negligence surrounding the accused's platforms.

Communication:

"I come before this court as a survivor of three assassination attempts, a member of the Valour family, and a witness to the atrocities that unfolded during the conflict. My family's history spans three generations, and we occupy seven villages across Titan. To us, the Valour family is not just a lineage but a way of life—a community of shared traditions, responsibilities, and mutual respect. We were revered, and for decades, our family was synonymous with leadership, dignity, and strength in our region.

But during the conflict, this very identity—our pride and standing—was turned into a weapon against us.

We have known of TSC and the accused long before the conflict began. In fact, the accused's companies had employed members of the Cavern Clan and offered technological services,



including TSC's cloud servers. In those early days, our family found TSC to be a useful tool. It allowed us to record real estate transactions and manage other assets. Its simplicity and reliability made it a favourite among our people. It worked well even in areas with poor internet connectivity, a significant advantage in the rural settings of Titan. We trusted the technology, appreciating its efficiency and practicality, and in hindsight, that trust was our undoing. Little did we know that the very platform we once found helpful would become a tool for our destruction.

During the conflict, our people were hunted like animals. The Scorpions—merciless, organized, and ruthless—used TSC as their weapon of choice to track and attack us. We stood unarmed and helpless while they looted, plundered, burned, and mutilated everything we held dear: our homes, our livelihoods, our hopes, and even our integrity.

The accused might claim that TSC was neutral, but for us, it was anything but. It became the enabler of violence, giving the Scorpions the means to find and target us in ways they never could have managed on their own.

The Valour family was revered. For generations, we were looked upon with respect, and our movements and whereabouts were closely guarded secrets. In ordinary times, it would have been nearly impossible for our enemies to track us. But TSC changed that.

During the conflict, our names, locations, and other sensitive information were systematically recorded on the platform. I know of several instances where entire families were tracked through TSC and brutally attacked. The Scorpions used it to coordinate mob violence with terrifying precision.

We tried to fight back—not with weapons, but with desperation. Some of us attempted to troubleshoot the platform, hoping to erase the incriminating data or disable the Scorpions' access. To our dismay, we discovered that while onboarding to TSC was astonishingly easy, escalating issues or seeking intervention from its administrators was next to impossible.

There was no recourse, no help, no way to stop the carnage.



I personally know of schoolgirls whose names, images, and locations were uploaded onto TSC. These innocent children became targets of unimaginable violence. Outside their schools, Scorpion mobs waited for them, and many of these girls were attacked.

Can you fathom what it feels like to know that a child's safety was compromised because of a tool designed and maintained by the accused? To know that the violence they suffered could have been prevented if only the creators of TSC had listened to our cries for help?

We ask this court: would the accused wait for a police officer or a court order to stop his creation from being used to brutalize children? Can he claim, with a clean conscience, that if not for legal intervention, it is acceptable for his platform to enable violence against toddlers?

It is not just the actions of the Scorpions that we hold accountable. It is the inaction of the accused, the refusal to intervene even when it was clear that his platform was being weaponized against innocent people. The Valour family has endured unimaginable loss. Our people were hunted, our homes burned, our children brutalized. We are here today not just to recount our suffering but to demand justice.”

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VW – 2 (PROFILE OF THE LEGAL REPRESENTATIVE OF THE VICTIMS – 2)

Name: *Amor Toveles*

Occupation: *Editor-in-Chief, In the News, Titan*

Nationality: *Titan*

Age: *47*

Brief Description:

The witness serves as the Editor-in-Chief of In the News, one of the most influential newspapers in Titan. With decades of experience in investigative journalism, the witness has been pivotal in uncovering the deeper socio-political ramifications of the Scorpion-Cavern conflict. Through a series of in-depth reports, the witness highlighted the devastating impact of technological misuse and governance failures during the crisis. The witness's investigative work focused on exposing how Titan Secure Cloud (TSC) was weaponized to track and target members of the Cavern Clan. This information, distributed on an immutable and accessible blockchain, led to systematic acts of violence. Additionally, the witness reported on financial irregularities tied to AlphaBeacon LLC, illustrating how the platform facilitated transactions that further fueled the conflict. By testifying, the witness provides a media perspective on the accused's failure to implement safeguards on these platforms, despite widespread evidence of their misuse. The testimony aims to underscore the critical role of accountability and the need for robust oversight to prevent such crises in the future.

Communication:

"I stand before you as a journalist who has spent nearly two decades chronicling the complexities, triumphs, and tragedies of Titan. My work as the editor-in-chief of In the News, an online journalism platform, is rooted in a singular mission: to uncover the truth and present it without fear or favor. Titan is a land of paradoxes. My homeland is a country where the resilience of its people constantly clashes with the limitations imposed by a polity that is, at best, helpless and, at worst, complicit in its dysfunction. Titan's economic struggles have birthed a few extraordinary individuals who have managed to rise above the constraints of their environment. These individuals often become beacons of hope, symbols of what can be achieved even in the face of adversity.



Jules Verne was one such figure. He represented the dream of turning nothing into everything, of becoming a global business magnate despite the odds. Yet, in the case of Verne, his rise seems to have become the very antithesis of the hope he once inspired. Instead of using his success to uplift others, his empire has, in my observation, turned into a black hole—consuming everything around it to serve his insatiable greed.

I have had the occasion to interview Jules Verne on at least five separate occasions since 2016. In each interaction, I found him to be articulate, charming, and outwardly progressive in his vision for the future of Titan. He spoke passionately about technology, innovation, and the role of entrepreneurship in transforming lives. But beneath the surface, there was always an undercurrent of calculation, a sense that every word, every move, was carefully curated to project an image rather than reveal the man behind it.

As a journalist, it is my job to ask tough questions, to peel back the layers of rhetoric and expose the truth. With Verne, this was particularly challenging. His actions and his businesses, particularly TSC and AlphaBeacon LLC, often seemed like a front for something larger—something far less noble. The more I investigated, the more I came to believe that the ultimate goal of Verne’s enterprises was to funnel resources into Flagpole, his personal investment vehicle, which anchors much of his net worth.

Flagpole was the glue that held his empire together, a shadowy entity that benefited from the success of his various ventures. The constant R&D at TSC, the aggressive hiring sprees, the controversies surrounding governance at AlphaBeacon—all of these seemed less about building a better Titan and more about bolstering Flagpole’s profitability.

The conflict between the Scorpions and the Cavern Clan is one of the darkest chapters in Titan’s history. It is a conflict that has left deep scars on both communities, and its impact will be felt for generations. It is true that both sides suffered immensely. The Scorpions and the Caverns both lost lives, homes, and hope. But as an observer and chronicler of these events, I must acknowledge that the suffering of the Cavern Clan was disproportionately severe. The Scorpions had two distinct advantages: their higher terrain, which gave them a strategic edge, and the technological tools provided to them, directly or indirectly, by Jules Verne and his companies.



TSC, in particular, became a weapon in the hands of the Scorpions. This simple yet powerful platform allowed them to pinpoint Cavern targets with chilling precision. Families were tracked, ambushed, and often wiped out before they even knew they were in danger. The combination of high ground and cutting-edge technology created a lethal imbalance, one that left the Caverns vulnerable and defenseless.

In these circumstances, the decentralization of blockchain technology does not absolve its creators of the ethical responsibility to mitigate harm. Verne had the power to act. He could have implemented safeguards, disabled services in conflict zones, or at the very least responded to warnings from authorities and communities. Instead, he chose to look the other way, prioritizing profit over people. Access to hardware alone can suffice in shutting a blessing gone rogue.

As we sit here today, Titan faces a choice. Do we allow the narrative of inevitability to take root—that Verne’s actions were simply the price of progress, that the suffering of the Caverns was an unfortunate but unavoidable consequence of innovation? Or do we take a stand, asserting that no amount of success can justify the enabling of violence and oppression?

In my view, justice in this case must be both specific and systemic. It must hold Verne accountable for his direct and indirect contributions to the conflict. And it must start the process by addressing those whose needs outweigh the rest. The Cavern Clan has borne the brunt of this conflict, and it is only fair that they be prioritized in the process of making amends. Rebuilding Titan requires us to first address the wounds that are deepest. Making the Caverns whole is not about favoring one group over another—it is about recognizing the disproportionate harm they endured and taking steps to rectify it. Only then can we begin the broader process of healing and reconciliation.”



ANNEXURES

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ANNEXURE 1 | ADDRESS TO EMPLOYEES

The following is an email address sent by Mr. Jules Verne to his senior employees in AlphaBeacon on **January 10, 2023** and has been produced before the Court by the ICC Prosecutor as documentary evidence.

“Dear Team,

I hope this message finds you safe and in good health amidst these trying times. I write to you with a heavy heart, aware of the anxiety and uncertainty we are all facing. Titan is burning—our homeland is engulfed in strife, and I know that each of you is worried for your safety and the safety of your loved ones. Believe me when I say, so am I.

Yet, even in the midst of these turbulent times, we must not lose sight of who we are and the mission we carry. The work we do here matters. The platform we’ve built together is seeing unprecedented growth—a meteoric rise in the number of subscribers that reflects not only the demand for what we offer but also the trust our customers place in us. We have become a crucial part of their lives, their businesses, and their hopes for a better future.

This is not the time to falter. Now, more than ever, I ask for all hands on deck. Each of us has a vital role to play, and we must pull our weight to ensure that the platform remains efficient, robust, and reliable. Our commitment to excellence and superior customer service has always been our defining ethos, and it is in these moments of adversity that our true character is tested.

I understand that asking for focus and dedication while the world outside feels chaotic may seem daunting. But I am confident in this team’s resilience and professionalism. Remember, we are not just employees—we are creators of a product that has touched lives and shaped industries. Our work carries a responsibility that goes beyond ourselves.

We are not alone in this journey. Our investors have placed their faith in us, and they expect nothing less than our best. They believe in our potential, just as I believe in each of you. Let us not let them down.



To support you during this period, our leadership team is exploring every possible avenue to provide additional safety measures, resources, and flexibility. We are here to listen and to act, so please do not hesitate to reach out if you have concerns or suggestions.

I know the path ahead will not be easy. But together, we can weather this storm and emerge stronger, both as individuals and as a company. Let us remain steadfast in our commitment to our mission, our customers, and to each other.

Thank you for your hard work, your courage, and your unwavering dedication.

Stay safe, stay strong, and let's continue to make a difference—together.

Warm Regards”

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ANNEXURE 2 | ASSETS OF THE ACCUSED

The following annexure comprises of the assets of the accused and the aggregate funds with FlagPole. The annexure has been collated by the Legal Representatives of the Victim and is based on public sources and the statutory filings made by Mr. Jules Verne and/ or his investee companies.

Tax records of Mr. Jules Verne

Titan requires its citizens and residents to file a statement of income at the end of each calendar year along with a statement of assets.

The information provided below has been consolidated from the tax filings for calendar years 2021 to 2023. Tax statement of 2024 is yet to be filed by Mr. Verne

Asset Statement (consolidated excerpts)²

Asset Statement (at cost)	2021
Liquid Assets	
Cash and bank balances (including deposits with banks)	
a) Money held with banks in Titan in the local currency	30,000
b) Money held in foreign currency in Titan or abroad	Nil
Other Assets	
Investment in shares, securities or any other traded or untraded financial instruments held worldwide	
a) Equity Shares held in Bed Bath and Beyond	4,500,000
b) Interest owned in FlagPole LLP as Equity	600,000
Total Assets of the taxpayer	[5,130,000]

² Converted into USD from the local currency.



Statement of Funds of FlagPole LLP as on the end of 2024 (relevant excerpts)

Particulars	USD
Source of Funds	
Payment due from AlphaBeacon LLC for various services provided during the financial year.	10,000,000
Investment by Partner	
a) Mr. Jules Verne and family (51% interest)	2,400
Total	[10,002,400]

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ANNEXURE 3 | REPORTS ON ACTION TAKEN BY TITAN

Finance for Titan

Associated Journalists Group

Headline: Government of Titan Tightens Grip on Jules Verne's Business Empire

In a dramatic series of events, the government of Titan appears resolute in dismantling the business empire of Jules Verne, a once-celebrated industrial magnate whose firms spanned highly technical fintech sectors. Over the past few months, an unprecedented wave of regulatory actions and judicial interventions has left the conglomerate in shambles, with its stock values plummeting to near-zero and its operational future hanging by a thread.

A Blitzkrieg

Regulatory bodies in Titan have launched a rapid-fire sequence of investigations into the alleged misconduct by Verne's firms. These inquiries span accusations of financial misrepresentation, terror financing, and breaches of code of ethics for companies. What is particularly striking is the speed and intensity with which these probes are unfolding. Agencies that historically moved with deliberation now seem to operate with a singular focus: unearthing any potential wrongdoing linked to Verne's empire.

Industry observers have noted that this aggressive posture suggests a coordinated effort at the highest levels of government. Regulators are leaving no stone unturned, even revisiting cases previously dismissed or settled. The Directorate for Corporate Oversight, Titan's primary financial watchdog, has reportedly reassigned nearly a third of its personnel to examine Verne's firms exclusively.

Judicial Cooperation

The courts in Titan have shown unprecedented enthusiasm in supporting these regulatory efforts. Requests for interim asset freezes, a measure typically met with rigorous scrutiny, are being granted with remarkable frequency and speed. Assets ranging from bank accounts to



physical infrastructure have been seized or placed under judicial supervision, effectively crippling the firms' operational capacities.

In one instance, a regional court froze \$9.5 million worth of assets of AlphaBeacon, which is our estimation should be about everything they have, within 48 hours of a regulatory petition—a record for Titan's notoriously bureaucratic legal system. Legal experts speculate that the judiciary's alignment with the government's objectives may reflect broader political dynamics rather than purely legal considerations.

Market Fallout

Unsurprisingly, the relentless regulatory and judicial onslaught has obliterated investor confidence. The stocks of Verne's companies, once market darlings, have witnessed a catastrophic collapse. Analysts estimate that the collective book value of these firms has plunged by over 98% in just six months.

Investors are fleeing en masse, fearing further losses as investigations expand and operational disruptions escalate. "It's a bloodbath," said a leading market analyst. "The government is sending a clear signal: they want these companies out of the picture, and no one wants to be caught holding worthless stock."

International Ripple Effects

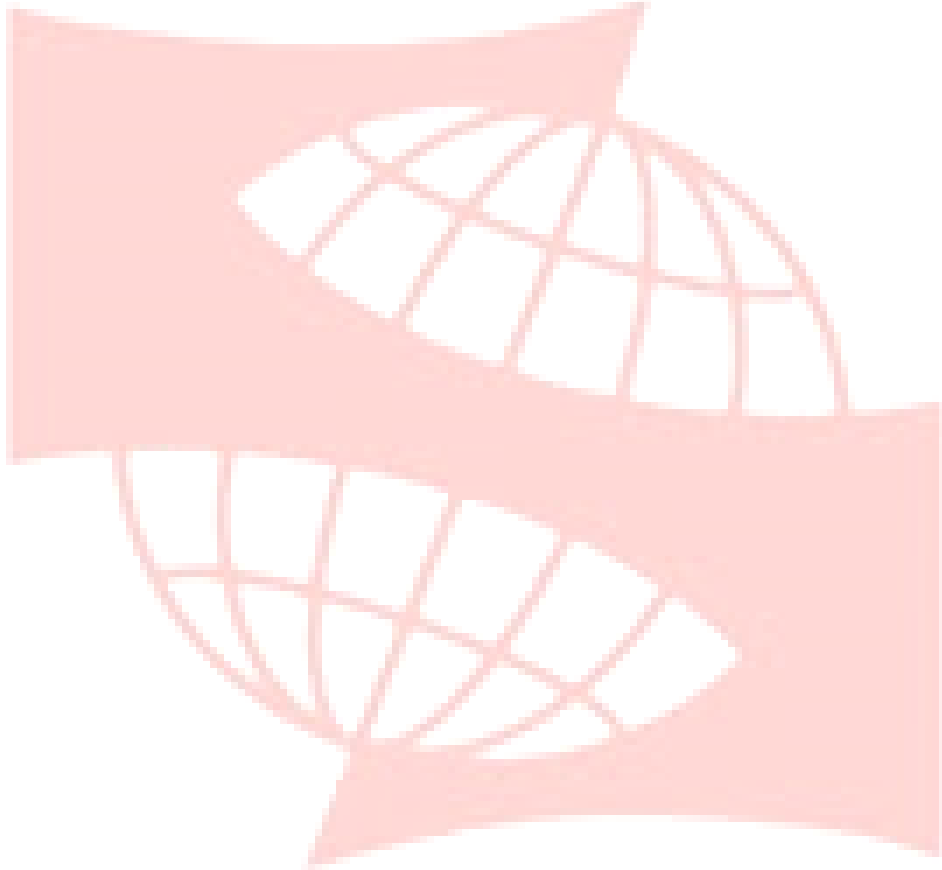
The fallout from Titan's crackdown has crossed borders. Regulatory bodies in several other countries where Verne's firms operated have initiated their investigations. Allegations of tax evasion, money laundering, and unfair trade practices are now under scrutiny in markets as diverse as the United States and South Africa.

Future Prospects

For Jules Verne and his once-mighty conglomerate, the future looks grim. With mounting liabilities, frozen assets, and collapsing revenues, many industry insiders believe that liquidation is inevitable.



Whether the government's aggressive stance will serve as a cautionary tale or spark broader debates about regulatory overreach remains to be seen. What is certain, however, is that Titan has sent a message loud and clear: no one is above the law—or the government's will.



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ANNEXURE 4 | REPORT ON THE POWER STRUCTURE IN TSC

Titan Daily

October 21, 2018

The Titan Secure Cloud (TSC) has once again demonstrated why it is hailed as a beacon of corporate governance excellence, earning the prestigious “Integrity in Enterprise” award from Titan Daily’s Independent Jury. This accolade recognizes TSC’s unwavering commitment to upholding the highest principles of integrity, checks, and balances, positioning it as a role model for corporations across Titan.

What sets TSC apart is its staunch adherence to governance principles rooted in the philosophy of decentralization and democracy. At the heart of its operations is an innovative system of checks and balances inspired by the ideals that underpin blockchain technology—decentralized control and collective decision-making.

TSC’s governance framework ensures that no single individual, not even the CEO, wields unchecked power. Key managerial personnel are strictly answerable to the board of directors and its various committees, which are predominantly headed and controlled by a distributed set of investors. This structure makes TSC a corporate rarity, blending democratic principles with a focus on operational transparency.

The Independent Jury noted that TSC’s model is not just a theoretical ideal but a robust, actionable strategy that fosters accountability at every level. “TSC’s dedication to decentralization and investor empowerment ensures that its decisions align with the interests of all stakeholders. This is corporate governance at its finest,” said one juror.

The jury’s detailed assessment revealed how TSC’s systems are engineered to ensure rigorous oversight. Key elements include:

- 1. **Investor-Controlled Committees:** Major corporate decisions require the express approval of committees headed by a diverse group of investors. This distributed control prevents any one faction from dominating the decision-making process.*
- 2. **Democratic Decision-Making:** TSC’s governance ethos reflects the philosophy that underpins blockchain systems—power is distributed, and decisions are made collectively.*



This ensures a level of transparency and accountability unparalleled in Titan’s corporate landscape.

3. **Board Oversight:** *The board of directors exercises significant oversight over the company’s operations, with managerial teams required to report regularly and justify strategic decisions.*

4. **Philosophical Commitment:** *The company’s governance model actively discourages short-termism and prioritizes sustainable, long-term value creation.*

While TSC’s governance model has earned widespread acclaim, some critics argue that it may be too rigid—almost to a fault. Detractors from the corporate world have pointed out that the extensive checks and balances can create bottlenecks, slowing down decision-making processes.

“TSC’s governance framework is undoubtedly impressive, but it borders on overregulation. The top brass often find their hands tied, unable to act swiftly in a dynamic market environment,” said a corporate governance analyst.

However, supporters counter that such bottlenecks are a small price to pay for the level of trust and stability the system engenders. “TSC has chosen principles over expediency, and that’s why it commands respect,” said an investor who has worked closely with the company.

Central to TSC’s success is the visionary leadership of Jules Verne. The Independent Jury emphasized Verne’s role in building an enterprise that not only aligns with his personal ethos but also reflects a profound understanding of Titan’s evolving corporate landscape.

Under Verne’s leadership, TSC has become synonymous with integrity, proving that businesses can thrive while adhering to the highest ethical standards. Despite his critics, Verne’s unwavering belief in decentralized governance has left an indelible mark on Titan’s corporate sector. Our sources believe that TSC will continue to express absolute obedience to Verne’s vision in the future also.

“He has built more than a company; he has built an institution that will outlast him, driven by values that are timeless,” said one of the jurors.



TSC's commitment to integrity and accountability positions it as a leader not just in Titan but globally. As corporations increasingly face scrutiny from stakeholders demanding transparency and responsibility, TSC's model offers a blueprint for the future. Despite its challenges, TSC continues to inspire confidence among investors, employees, and the public. Its governance framework ensures that decisions are taken in the best interests of all stakeholders, aligning economic success with ethical responsibility.

As Jules Verne himself said in a recent address, "Governance isn't just about rules; it's about trust. At TSC, we don't just build products; we build faith." With its latest recognition, TSC has cemented its place at the forefront of Titan's corporate world, setting a benchmark for integrity and democratic governance. It remains to be seen how this unique model evolves, but one thing is certain—TSC is here to stay, a shining example of what a values-driven organization can achieve.

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ANNEXURE 5 | CHARTER DOCUMENTS OF ALPHABEACON

The following is an excerpt of the latest charter documents of AlphaBeacon dealing with the powers of the Managers of the Company as on date. The annexure has been submitted by the Legal Representatives of the Defence before the Court for its noting.

Article 12 | Managers

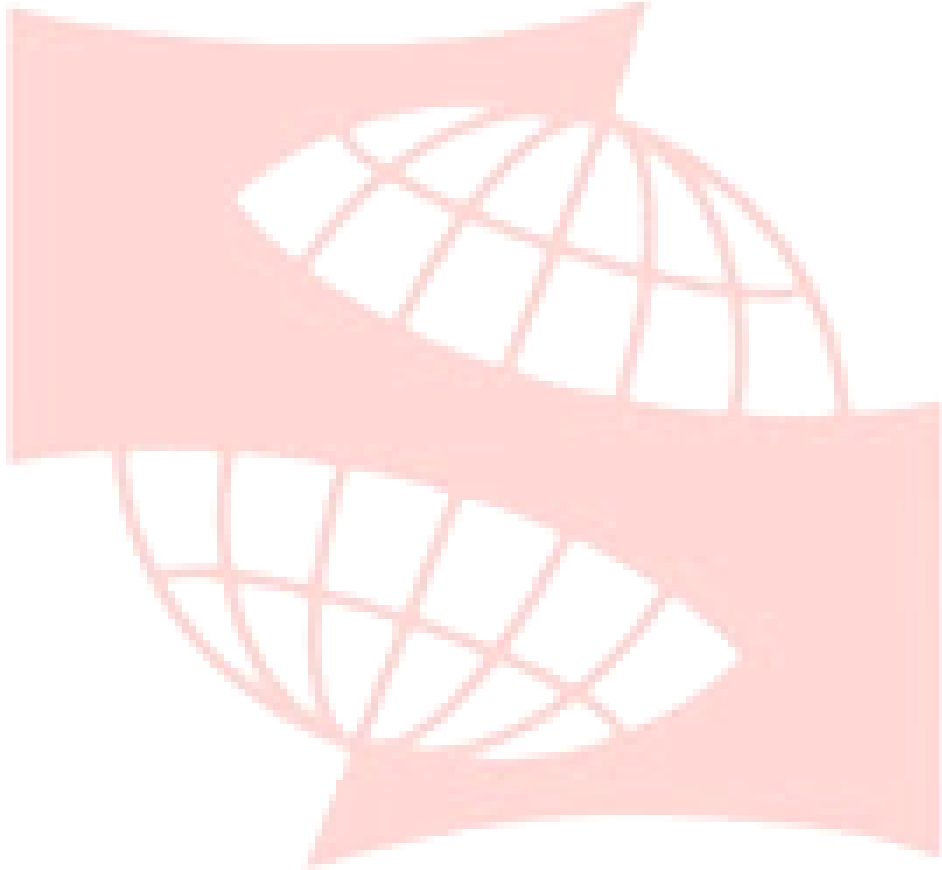
- 12.1 The officers of the Corporation may consist of a Chairman, a Chief Executive Officer, one or more Presidents, one or more Vice Presidents (who may be designated as Corporate Vice Presidents, Senior Vice Presidents, Executive Vice Presidents or Group Vice Presidents), a Secretary, and a Treasurer as appointed by the Board of Directors or the Chief Executive Officer.
- 12.2 The Corporation may have such additional or assistant officers (referred to as “additional officers”) as the Board of Directors, Chief Executive Officer, or Chief Operating Officer may deem necessary for its business and may appoint from time to time. The Board of Directors shall also have the authority, but shall not be required, to designate officers as the Chief Operating Officer, the Chief Financial Officer or similar such titles. Any two or more offices may be held by the same person.
- 12.3 If a director/officer has not been designated as Chairman, or if the designated Chairman is not present at a meeting, the Board of Directors shall elect a Chairman from amongst its members to serve as Chairman of the Board of Directors for such meeting. The Chairman shall preside at all meetings of the Board of Directors, and shall have such other powers as the Board may determine.
- 12.4 The officers of the Corporation shall be appointed annually by the Board of Directors at the first meeting of the Board held after each annual meeting of the shareholders. If officers are not appointed at such meeting, such appointment shall occur as soon as possible thereafter, or may be left vacant. Each officer shall hold office until a successor shall have been appointed and qualified or until said officer’s earlier death, resignation, or removal.



- 12.5 The Chief Executive Officer shall have general charge and supervision of the business of the Corporation, shall see that all orders, actions and resolutions of the Board of Directors are carried out, and shall have such other authority and shall perform such other duties as set forth in the presents or, to the extent consistent with the presents, such other authorities and duties as prescribed by the Board.
- 12.6 Each officer other than the Chief Executive Officer shall have the authority and shall perform the duties set forth in these presents or, to the extent consistent with the presents, the duties prescribed by the Board of Directors, by the Chief Executive Officer, or by an officer authorized by the Board to prescribe the duties of such officer. Any designation of duties by the Chief Executive Officer or other officer shall be subject to review by the Board of Directors but shall be in full force and effect in the absence of such review.
- 12.7 The Board of Directors shall have authority: (a) to fix the compensation, whether in the form of salary, bonus, stock options or otherwise, of all officers and employees of the Corporation, either specifically or by formula applicable to particular classes of officers or employees; and (b) to authorize officers of the Corporation to fix the compensation of subordinate employees. The Board of Directors shall have authority to appoint a Compensation Committee and may delegate to that committee any or all of its authority relating to compensation. The appointment of an officer shall not of itself create contract rights.
- 12.8 Any officer of the Corporation may resign at any time by giving notice to the Board of Directors or the Corporation. Any such resignation is effective when the notice is given, unless the notice specifies a later date, and shall be without prejudice to the contract rights, if any, of the officer.
- 12.9 The Board of Directors, by majority vote of the entire Board, may remove any officer or agent, with or without cause. An officer or assistant officer, if appointed by another officer, also may be removed by any officer authorized to appoint officers or assistant officers. The removal shall be without prejudice to the contract rights, if any, of the person so removed.



12.10 If any office becomes vacant by any reason, the directors may: (a) appoint a successor or successors who shall hold office for the unexpired term; or (b) leave such office vacant.



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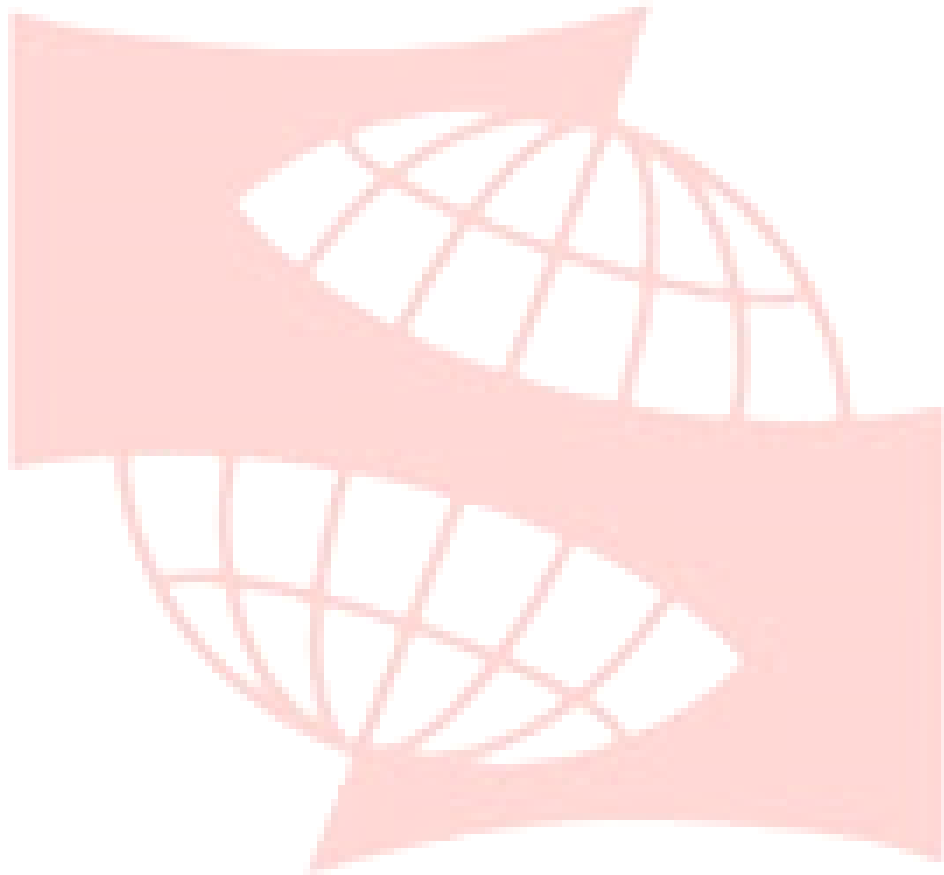


NOTES TO THE COMPROMIS

1. Any questions pertaining to the jurisdiction/authority of the ICC, including but not limited to jurisdiction over the charge approved, shall not be raised by the participants.
2. For purposes of these mentioned issues, participants shall solely rely on the facts given in the official Compromis under strict application of the principle - “as is, there is...whatever where is.”
3. The participants are at the liberty to develop multiple strategies to be used in the different oral rounds of the trial, and the same is encouraged.
4. Notwithstanding anything mentioned in Point (3) above, the memorials submitted by the participants shall cover all aspects of the law as applicable to the factual matrix in the backdrop of the charge confirmed against the accused.
5. Paying due reverence to the spirit of SICTA, the participants are encouraged to understand and showcase the technical nuances of different events covered in the factual matrix.
6. Through oral submissions, the participants in their respective roles are expected to 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 international criminal law and public international law explored in various parallel jurisdictions and justify the application of the same in an ICC-based trial with cogent reasons.
7. The official Compromis, including all the annexures, is a work of fiction and has been framed with the sole intention of facilitating the advanced study of international criminal law and the development of professional advocacy skills of law students. The official Compromis has no connection, intentional or otherwise, to any historical/present political, sociological, or cultural event and does not represent any ideology or affiliation to any political/non-political issue.
8. The participants will note that for the purposes of SICTA, 2025, it will be deemed that each of Titan, Scorpion and Cavern Clan have executed and ratified the Rome Statute, the Geneva



Conventions and each of the other relevant international instruments, as and to the extent applicable to the present case based on the factual matrix provided hereinabove.



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