

INTERNATIONAL COURT OF JUSTICE

SPECIAL AGREEMENT

BETWEEN THE REPUBLIC OF ANNOLAY (APPLICANT)
AND THE REPUBLIC OF RESTON (RESPONDENT)
ON THE DIFFERENCES BETWEEN THEM
CONCERNING THE WOMEN AND CHILDREN OF THE CIVIL WAR

jointly notified to the Court on 22 October 2018

COUR INTERNATIONALE DE JUSTICE

COMPROMIS

ENTRE LA REPUBLIQUE D'ANNOLAY (DEMANDEUR) ET
LA REPUBLIQUE DE RESTON (DEFENDEUR)
VISANT A SOUMETTRE
A LA COUR INTERNATIONALE DE JUSTICE
LES CONTESTATIONS QUI LES OPPOSENT CONCERNANT
LES FEMMES ET LES ENFANTS DE LA GUERRE CIVILE

notifié conjointement à la Cour le 22 octobre 2018

**JOINT NOTIFICATION
ADDRESSED TO THE REGISTRAR OF THE COURT:**

The Hague, 22 October 2018

On behalf of the Republic of Annolay and the Republic of Reston, in accordance with Article 40(1) of the Statute of the International Court of Justice, we have the honour to transmit to you an original of the Special Agreement for Submission to the International Court of Justice of the Differences between the Republic of Annolay and the Republic of Reston Concerning the Women and Children of the Civil War, signed in Washington, D.C., on 15 October 2018.

Ambassador of the Republic of Annolay
to the Kingdom of The Netherlands

Ambassador of the Republic of Reston
to the Kingdom of The Netherlands

**SPECIAL AGREEMENT
BETWEEN THE REPUBLIC OF ANNOLAY AND THE REPUBLIC OF RESTON
FOR SUBMISSION TO THE INTERNATIONAL COURT OF JUSTICE
OF THE DIFFERENCES BETWEEN THEM CONCERNING
THE WOMEN AND CHILDREN OF THE CIVIL WAR**

Annolay and Reston,

Considering that differences have arisen between them concerning certain conduct vis-a-vis women and children in the wake of the Dysfunctionian civil war and other matters;

Recognizing that the Parties concerned have been unable to settle these differences by negotiation;

Desiring further to define the issues to be submitted to the International Court of Justice;

Therefore, Annolay and Reston have concluded the following Special Agreement:

Article 1

The Parties submit the questions contained in the Compromis (together with Clarifications to follow) to the International Court of Justice pursuant to Article 40(1) of the Statute of the Court.

Article 2

(a) The Court is requested to decide the Case on the basis of the rules and principles of general international law, as well as any applicable treaties.

(b) The Court is also requested to determine the legal consequences, including the rights and obligations of the Parties, arising from its judgment on the questions presented in the Case.

Article 3

(a) The Parties shall accept any Judgment of the Court as final and binding upon them and shall execute it in its entirety and in good faith.

(b) Immediately after the transmission of any Judgment, the Parties shall enter into negotiations on the modalities for its execution.

In witness whereof, the undersigned plenipotentiaries have signed the present Special Agreement and have affixed thereto their respective seals of office.

Done in Washington, D.C., this 15th day of October 2018, in triplicate in the English language.

Ambassador of the Republic of Annolay
to the Kingdom of The Netherlands

Ambassador of the Republic of Reston
to the Kingdom of The Netherlands

THE REPUBLIC OF ANNOLAY V. THE REPUBLIC OF RESTON

THE CASE CONCERNING THE WOMEN AND CHILDREN OF THE CIVIL WAR

1. This dispute arises in the wake of a civil war that occurred in the now-defunct Kingdom of Dysfuncția from approximately March 1996 through September 1999. The civil war resulted in the creation of two new states, the Republic of Reston (Respondent here) and the Republic of Cascadia, which is not a party to this case.
2. The Dysfuncțian conflict marked the most recent chapter in 300 years of rivalry between the two principal ethnic groups in the country: the Cascadians and the Restonians. In 1995, King Mikhail IV of Dysfuncția died without an heir, and two claimants to the throne stepped forward, one Cascadian and one Restonian. Supporters of each claimant quickly organized into armed militias, and small skirmishes escalated into full-scale civil war in March 1996.
3. In April 1997, War-Time Relief International (WRI), an international human rights and relief agency which had field representatives in Dysfuncția, reliably reported that members of the Restonian militia were engaging in the systematic rape of ethnic Cascadian women. WRI treated and interviewed hundreds of victims of these rapes and urged the international community to take "any action possible, and exercise any influence available, to stop this unacceptable, criminal abuse of Cascadian women." Many other international human-rights organizations sent their own observers to the conflict, and all echoed WRI's sentiments, although there were differences of opinion among the organizations regarding the extent to which the practice was condoned by militia commanders.
4. The leader of the Restonian militia, Colonel Georg Raskolnikov, recalled in a March 1998 interview with the *International Times-Picayune*-respected newspaper with millions of subscribers all over the world, that he had heard that rapes were being committed, but declared that he was powerless to stop them. A fact-finding mission sent by the United Nations Human Rights Commission concluded in early 1998 that "literally hundreds of rapes of Cascadian women are being committed monthly by members of the Restonian militia." It also observed that "Raskolnikov and his deputies have taken no steps to stop the deliberate use of these rapes as a means of coercion, spreading intimidation and terror among the Cascadian population."
5. Applicant, the Republic of Annolay, is an immediate neighbor of the former Dysfuncția, today bordering the territories of both Reston and Cascadia. Annolay is a democratic, developed state with a declining birthrate. Annolay has become a significant foreign aid donor to recipient countries around the world, including Reston. Annolay is a party to most of the global human rights instruments.
6. Annolay remained neutral during the civil war. Concerned about the growing number of refugees, Annolay's President, Mary Q. Contrary, urged leaders of both sides to cease hostilities, and offered her country's services in organizing a peace conference. In March 1999, leaders of the two ethnic militias agreed to a cease-fire. There were, in the ensuing months, numerous allegations of breaches of that agreement by both sides. After long and detailed negotiations, the two sides agreed on September 14, 1999, to a partition of the territory of Dysfuncția into two new states, Reston (composed primarily of ethnic Restonian cities and territory) and Cascadia (composed primarily of ethnic Cascadian cities and territory).
7. On November 1, 1999, Reston held its first democratic elections since independence. More than 85% of the population voted. The former militia commander, Colonel Raskolnikov, ran for the presidency on a platform of "National Healing," *inter alia*, promising a full amnesty to persons accused of crimes committed during the Dysfuncțian civil war. Raskolnikov was elected president by a wide margin. On his first day in office, as promised, he granted a full national amnesty to all persons within Reston, whether of Restonian or Cascadian ethnicity, accused of what he called "unfortunate and inappropriate conduct during the time of civil war."
8. Reston is a developing country whose largely agrarian economy was devastated by the civil war. Reston has an emerging free-market economy, and it is active in regional trade and political organizations. By contrast, the culture of Cascadia is socially and culturally conservative, and its government and its laws are based upon customs dating back to the 10th century kingdoms in the region.

RESTONIAN CHILDREN IN ANNOLAY

9. The Dysfuncțian civil war left thousands of children orphaned and thousands of families in Reston without homes, sources of income, or food. Private charities, state-run orphanages, and shelters in Reston were not able to provide adequately for these people. As a result, the homeless and destitute tended to congregate in makeshift camps whose conditions were universally condemned as wretched.
10. Anne Jamieson, an Annolaysian citizen, is the Executive Director of WRI. In December 1999, Mrs. Jamieson initiated a series of television and newspaper advertisements, entitled, "The Poor Children of Reston." During this campaign, Mrs. Jamieson repeatedly stated, "I am alarmed at the conditions reported to be rife in the camps

- within Reston, and especially the conditions in which many children are living. I urge Annolaysian families to open your hearts and your homes to the poor children of Reston." Due in large part to these advertisements, over the next twelve months, Annolaysian families adopted nearly 2,000 Restonian children.
11. Nearly all of the adoptions were facilitated by the Annolaysian Regional Adoption Society (ARAS). ARAS is a not-for-profit private company incorporated in Annolay. It has no affiliation with any government agency, although a number of prominent Annolaysian citizens and government officials hold seats on its Board of Directors. The company provided travel and clerical support for Annolaysian families wishing to adopt Restonian children, charging them a small fee in addition to ARAS's expenses. ARAS arranged for prospective Annolaysian parents to travel to Reston, meet the Restonian children, and attend "fitness interviews" with officials of the Restonian Ministry of Child Welfare. Such interviews are required under provisions of Restonian adoption law (unchanged from the laws of Dysfunctia, and still in effect today). The stated purpose of the "fitness interview" is to satisfy officials that the applicants are fit to adopt and care for the child. If the interview ends successfully, the applicants receive a "Certificate of Authorization for Foreign Adoption," which they are required to present at the border in order to leave Reston with a Restonian child.
 12. Upon returning to Annolay, prospective Annolaysian parents faced few additional legal requirements. In the case of foreign adoptions, Annolaysian law provides specially-designed, streamlined procedures that permit the swift conclusion of formalities, usually within weeks.
 13. In January 2001, the *International Times-Picayune* published a series of articles entitled "Corruption in the Nursery: Adoption of 'The Poor Children of Reston' Is Making Someone Rich." The story revealed that Restonian border officials, acting without authority, were routinely requiring payments in excess of US\$500 to permit adopting parents to leave the country with Restonian children. According to the newspaper, Annolaysian couples who had failed their fitness interviews, and therefore could not present certificates of fitness, had been charged US\$2,500 by border officials to leave the country with the children, contrary to Restonian law. Some Annolaysian citizens told the newspaper that, since they were aware that Restonian law was openly being ignored, they did not even bother attending their fitness interviews, and simply agreed to pay whatever bribe might be required by border officials. When such Annolaysians sought to return to Annolay with Restonian children, they were seldom questioned at the border by Annolaysian officials, and were in all cases allowed to re-enter with the children whether or not they had Restonian certificates of fitness.
 14. After the *International Times-Picayune* story was published, President Contrary reportedly received numerous complaints from prominent members of the ARAS board of directors and from adoptive Annolaysian parents, demanding that her government take action to protect the interests of Annolaysian citizens who were seeking to adopt "the poor children of Reston." On February 2, President Contrary sent a diplomatic note to President Raskolnikov of Reston. The note read, in part: "From an old democracy to a young one, I remind you that international law and common morality require your government to address the rampant corruption at your borders. This practice is occurring at the expense of Annolaysian citizens, who want nothing more than to help your country's children, whose lives have already been devastated by war, neglect, and mistreatment. I implore you to take immediate steps to ensure that Annolaysian citizens can give these children the futures they deserve."
 15. After some weeks and additional pressure from the Annolaysian embassy in Reston, President Raskolnikov replied through diplomatic channels that the border corruption issue was "a small one compared to the many other issues facing our country." He stated, "Furthermore, if all these allegations are true, then Annolay is complicit in the illegal removal - indeed, in the kidnapping of Restonian children."
 16. On March 1, 2001, the *International Times-Picayune* published a letter from Mrs. Jamieson, lambasting the Restonian system. The letter ended, "In the best Annolaysian tradition of love for our fellow humans, our citizens are opening their hearts and their homes. The Annolaysian people want nothing but to introduce poor children to a better life. Corrupt Restonian state officials profit at the expense of these benevolent Annolaysians. The Restonian children, who began their lives as victims of war, are now becoming commodities in a corrupt peace. It is an outrage, and an offense against humanity. And we know who is responsible. PRESIDENT RASKOLNIKOV, THIS SHAME IS YOURS."
 17. Although President Raskolnikov did not respond publicly to the letter, the government of Reston permanently reassigned approximately 10 border officials accused by the *International Times-Picayune* of corrupt practices. After the reassignment, an assistant to President Raskolnikov stated, "The problem has been taken care of." No former border officials have been prosecuted or otherwise disciplined. In a brief follow-up story in April 2001, the *International Times-Picayune* reported that the reassigned officers represent approximately 10% of the individuals implicated in the bribery and extortion efforts reported in its series of articles the year before.

REPARATIONS FOR VICTIMS OF WARTIME RAPES

18. On March 21, 2001, President Contrary delivered a televised address before Annolay's parliament. She stated, "At this time in world history, nations must understand that the abuse of women in war is not justified, proper or right. I am gravely concerned about the widespread and systematic rape of ethnic Cascadian women that occurred during the Dysfunction civil war. I am committing the resources of our Justice Ministry and our Foreign Affairs Ministry to seeking justice for these women and punishment for those who harmed them." In addition, she called upon the governments of Cascadia and Reston to "punish the militiamen who raped these women, and to pay reparations to the women who were victims of these brutal crimes."
19. On March 31, 2001, the Minister of Foreign Affairs of Cascadia replied in his weekly press conference, stating, "The wounds of the civil war are too fresh, and we are still rebuilding our society and economy from the devastation of the civil war. Cascadia will not pursue this matter at this time."
20. On the same day, Restonian President Raskolnikov released a written statement in response to President Contrary. The statement read, in part: "I call your attention to the general amnesty which I declared on my first day in office. As in all wars, many of us did things during that war that we would rather forget. We cannot reopen old wounds. Now is a time for healing and moving past old problems. That is why we have declared the general amnesty and applied it to all citizens of Reston. We have already established counseling and crisis centers here in Reston for anyone who suffered as a result of the civil war. Besides, all available funds are being used to reconstruct our country's infrastructure and to improve the lives of Restonian citizens." President Raskolnikov also categorically denied that his government owed any duty to pay reparations to victims who were no longer in Reston for the actions of Restonian militias, on the grounds that those actions were taken before the Republic of Reston came into existence, and therefore did not entail the responsibility of the new Republic.
21. With relief in Cascadia and Reston effectively foreclosed, on April 20, 2001, President Contrary issued the following statement to the international media: "If our neighbors will not pursue justice for these women, it falls to Annolay to take up their cause. My government will seek reparations for the Cascadian women raped during the Dysfunction civil war." A spokesperson for President Contrary declared that Annolay was "very concerned about corruption and respect for human rights in Reston, which is after all a major recipient of Annolaysian humanitarian and economic aid." This remark was widely interpreted in the international press as a threat to withhold further assistance.

CASCADIAN WOMEN IN ANNOLAY

22. Within the conservative culture of Cascadia, women known to have been raped are ostracized and unwelcome in mainstream society. Many are cast aside by their families and friends, and typically have difficulty finding and keeping employment. In the case of the women raped by the Restonian militia, these effects were compounded by the devastation to the Cascadian economy resulting from the civil war. The United Nations Human Rights Commission estimated in December 1999 that approximately 4,000-7,000 Cascadian women, claiming to have been the victims of sexual abuse, were living without family or the means to support themselves. These women were often called "women on the fringe."
23. The Schmandefare Company is a privately-owned domestic services and hospitality company incorporated in Annolay, with no formal ties to any government or public agency. According to the *International Times-Picayune*, the company also operates a large number of brothels throughout Annolay. Although prostitution and solicitation of prostitutes are crimes in Annolay, the laws prohibiting such practices are rarely enforced.
24. According to numerous reports, the substantial accuracy of which is uncontested, representatives of the Schmandefare Company traveled to Cascadia shortly after the peace treaty was signed in September 1999, and recruited hundreds of "women on the fringe" to work and find new lives in Annolay, primarily as nannies or domestic servants. The representatives promised the women jobs, shelter, and education in the Annolaysian language, as the majority of women spoke only their native Cascadian tongue. They assisted the women in filing visa, travel, and work-permit applications and arranged for their travel from Cascadia. In exchange for this assistance, the Schmandefare Company charged the women a flat fee of US\$10,000. As this was much more than they could afford, the company extended loans to each woman in the amount of the fee that she could not pay. Typically, the terms of the loans extended over ten years, at an interest rate of ten percent, compounded annually, meaning that the amount to be repaid was more than double the amount loaned. Such loan terms are consistent with the laws of Annolay, Cascadia and Reston.
25. By December 2000, the Schmandefare Company had relocated over 2,500 Cascadian women from Cascadia to Annolay, which promptly granted them permanent resident status. Once the women were resettled in Annolay, the company put nearly all of them to work in its brothels. At no time were any of these women Restonian citizens or entitled to Restonian citizenship.
26. Mr. Fred Schmandefare, a citizen and resident of Annolay, is the founder and Chief Executive Officer of the Schmandefare Company. According to numerous articles in the *International Times-Picayune*, the basic facts of

which have not been contested, Mr. Schmandefare was responsible for organizing the recruiting and transportation of women from Cascadia to Annolay for employment in the brothels. Shortly after the Dysfunctional civil war, Mr. Schmandefare traveled several times between Annolay and Cascadia, but has not left Annolay recently. According to the *International Times-Picayune*, Mr. Schmandefare enjoys considerable influence with local police and government officials in Annolay, and is also rumored to have close ties to international organized crime groups.

27. On May 1, 2001, the Institute for Labor Studies and Advancement ("ILSA"), a well-respected, international non-governmental organization, published a report on the sex industry in Annolay. A large portion of the report focused upon "the plight of foreign women working as prostitutes in Annolay's cities." The report discussed issues common to all of the Cascadian women working in brothels, but focused in particular on the women working in brothels owned and controlled by the Schmandefare Company.
28. The ILSA Report found that many Cascadian women working for the Schmandefare Company were subject to restraints on their liberty, and were frequently mentally and physically abused. Their appeals to Mr. Schmandefare or to Annolaysian police officials were routinely dismissed or ignored. The ILSA Report noted in particular that, according to official records, the police, as well as at least three Annolaysian governmental agencies -- the Department of Immigration, the Department for Services to Children and Families, and the Department of Worker Safety and Compensation -- had received written complaints from women alleging the conduct described in the ILSA Report. No Annolaysian agency ever initiated a formal investigation based upon the allegations.
29. The ILSA Report cited as typical the case of "Heidi F." (not her real name), a Cascadian rape victim working for the Schmandefare Company. The ILSA Report said that Heidi F. was housed in a dormitory with 19 other women, and was forced to pay her employers for food, clothing and housing at rates substantially above prevailing Annolaysian retail prices. The dormitory was insufficiently heated in the winter, and uncomfortably hot in the summer. Insects and other vermin were rampant. When Heidi F. complained to her supervisors, she was temporarily removed from the work schedule, and thus deprived of income and driven deeper into debt. On the occasions when she was unable to pay for her food or clothing, the amount was added to her debt to the company. She was generally not permitted to leave the dormitory unsupervised except to meet customers, to jog in the brothel's exercise room, or for medical appointments. At one point, Heidi F. fled the dormitory. Shortly thereafter, the police contacted Mr. Schmandefare, informing him that Heidi F. had broken her ankle, and was in the hospital. After the hospital treated her ankle, Mr. Schmandefare paid the hospital for its services, and the police returned her to the brothel. She was immediately required to return to work, and the cost of her medical bills was added to her debt. The ILSA Report, which was full of details and testimonials consistent with Heidi F.'s experience, was widely publicized in the Annolaysian and international press.
30. At a routine press conference following the issuance of the ILSA Report, on May 17, 2001, Annolaysian President Contrary answered questions from members of the international media regarding the Report. She was quoted in generally reliable newspapers as having stated that she was "shocked and horrified." She announced that her government was putting together a blue-ribbon panel of criminal-law and women's-rights experts, including prosecutors from the Annolaysian Ministry of Justice, to examine the problem. One reporter asked her whether the Annolaysian government bore responsibility for allowing the Schmandefare Company to operate in Annolay, to which President Contrary replied, "Our committee will investigate this matter thoroughly. It is important to note that the government of Annolay has no independent knowledge of the facts underlying the ILSA Report. There is no reason to believe that the abuses alleged in this Report are widespread throughout the country."
31. Asked whether Mr. Schmandefare would be investigated or prosecuted, President Contrary replied, "We are concerned about the welfare of all Cascadian women, and our hearts certainly go out to those women who were brutally raped by Restonian militiamen during the Dysfunctional civil war. I respect ILSA, but it is too soon to determine whether criminal charges are warranted, based solely upon this Report." She was pressed by several reporters for a comment on the ILSA Report's findings that government agencies had been aware of the mistreatment. President Contrary replied, "Some complaints may have been filed. Of course I regret the fact that some of our agencies may have overlooked individual cases. However, our government is a large organization, with many branches, many agencies, and thousands of employees. When a few agencies receive isolated complaints from a few individuals, this does not mean the government had knowledge of a widespread course of conduct, much less that it was involved in or responsible for it. Conduct of the kind alleged in the ILSA Report is reprehensible. We are very upset about these allegations, and there may be private parties whose actions will merit prosecution. We will see. But the government of Annolay has not abused a single Cascadian woman, and never will." The President would not comment on whether she had Mr. Schmandefare in mind as someone who should be prosecuted.
32. After learning of this press conference, Restonian President Raskolnikov sent a memorandum to his Justice Minister, dated May 19, 2001. The memorandum was later leaked to the press, and the Office of the President has since acknowledged that the published version was accurate. President Raskolnikov wrote, "Annolay's President

- challenges the conduct of Restonian militiamen during the civil war, but at the same time, it seems she fails to protect the human rights of women in her own country, where prostitution is presumably illegal, as it is here. Please have your Department investigate this."
33. Later that day, the Restonian Justice Ministry announced, in relevant part, "Based upon the principle of universal jurisdiction, applicable in the case of crimes against humanity, it is the intention of this Ministry to prosecute Mr. Fred Schmandefare for the international crime of illegally trafficking women for the purpose of sexual slavery. If we can obtain jurisdiction over him, we will; if we cannot, we shall try him anyway in absentia." Following the announcement, the Restonian Foreign Ministry requested through ordinary diplomatic channels that Annolay make Mr. Schmandefare available for trial. There is no bilateral extradition treaty in effect between Annolay and Reston.
 34. The next day, President Contrary issued the following statement: "President Raskolnikov is attempting to distract the international community from the problems in his own country. No 'crime against humanity' is implicated here, nor do we concede that Reston has any right to exercise universal jurisdiction over Mr. Schmandefare, an Annolaysian citizen. Reston has no right, given its past conduct, to set itself up as the world's judge and jury. It must respect Annolay's sovereignty."
 35. President Raskolnikov held his own press conference the next day, at which he released copies of the previously unpublished background research that was used in the preparation of the ILSA Report. The documentation clearly indicated that the Schmandefare Company operated dozens of brothels in the fashion described in the original report. During the press conference, President Raskolnikov stated, "We have announced that we will try the international criminal, Mr. Fred Schmandefare, under the principal of universal jurisdiction. We are surprised and disappointed that Annolay has not already prosecuted Mr. Schmandefare. Perhaps we should not have been so surprised. In any case, the only remaining question is who is the worse criminal: Schmandefare, or the government of Annolay, for permitting sexual slavery in its territory?" The Annolaysian government did not reply, although the press spokesman for the Foreign Ministry denounced President Raskolnikov's comments as "an unfortunate choice of words."

CONCLUSION

36. During the period 2017-2018, the governments of Annolay and Reston exchanged a series of heated diplomatic messages concerning the issues discussed in this *Compromis*. Following unsuccessful mediation by representatives of the United Nations Secretary General, the parties agreed to submit the issues discussed in this *Compromis* to the International Court of Justice. President Contrary has ordered Mr. Schmandefare not to leave the country, pending the judgment of the Court.
37. Several states have raised the matters discussed in this *Compromis* before the United Nations Security Council and General Assembly, but no resolution or any other formal action has been proposed or adopted. After being presented with a draft of this *Compromis*, the Secretary-General and the President of the Security Council issued a joint statement declaring that they would take no position on the legal issues raised in this case, pending the decision of the Court.
38. Annolay was one of the original members of the United Nations, as was Dysfuncntia. Reston succeeded to Dysfuncntia's membership upon the conclusion of the September 1999 peace agreement. Both Annolay and Reston are parties to the Vienna Convention on the Law of Treaties, and both countries voted in favor of U.N. General Assembly Resolution 56/83, respecting the final draft of the International Law Commission's Articles on State Responsibility. Annolay is a party to the International Covenant on Economic, Social and Cultural Rights; the International Covenant on Civil and Political Rights; the Convention on the Elimination of All Forms of Discrimination Against Women; the Convention on the Rights of the Child; and the Convention Against Torture and Other Cruel, Inhuman or Degrading Treatment or Punishment. Dysfuncntia was not, and Reston is not, a party to any of these instruments.
39. Annolay is also party to the "Regional Anti-Corruption Convention" (RACC), which is identical to the Council of Europe's Criminal Law Convention on Corruption. Reston has signed but not ratified the RACC. Neither state is a party to any other relevant treaty. Annolay has enacted the domestic implementing legislation required under the RACC, but to date there have been no prosecutions pursuant to this legislation. Reston has no specific anti-bribery laws.
40. Annolay and Reston agree that no other State is a necessary party for the resolution of any of the issues that are the subject of this *Compromis*.
41. Applicant Annolay requests that the Court adjudge and declare that:
 - a. Reston has breached its international obligations and must pay damages to Annolay to be distributed as reparations to those victims of systematic rape during the Dysfunction civil war who are now resident in Annolay;
 - b. Reston is in breach of its international obligations with respect to the bribes exacted by its border officials from Annolaysian citizens, and is obligated to pay restitution in the amount of the bribes to Annolay on behalf of the

- Annolaysian adoptive parents;
- c. Reston is not entitled to exercise universal jurisdiction over Mr. Fred Schmandefare; and
 - d. Annolay has not breached any international legal obligations deriving from the alleged treatment of Cascadian women working in brothels in Annolay, and in any event, Reston has no standing to enforce any such obligations.
42. Respondent Reston requests the Court to adjudge and declare that:
- a. Reston is not liable for reparations to the rape victims now resident in Annolay, and in any event Annolay has no standing to raise such claims;
 - b. Reston has not breached any international obligation owed to Annolay with respect to the bribes exacted by its border officials, and is not obligation to pay restitution;
 - c. Reston is entitled to exercise universal jurisdiction over Mr. Fred Schmandefare; and
 - d. Annolay has breached its international legal obligations with respect to the treatment of Cascadian women working in brothels in Annolay.