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No.: **ICC-RoR220-04/21**

Date: **10 August 2021**

THE PRESIDENCY

Before: Judge Piotr Hofmański, President
Judge Luz del Carmen Ibáñez Carranza, First Vice-President
Judge Antoine Kesia-Mbe Mindua, Second Vice-President

SITUATION IN DARFUR, SUDAN

**IN THE CASE OF
THE PROSECUTOR *v.*
ALI MUHAMMAD ALI ABD-AL-RAHMAN (“ALI KUSHAYB”)**

Public

Motion for Judicial Review of Registrar’s Decision

Source: Defence for Mr Ali Muhammad Ali Abd-Al-Rahman

Document to be notified in accordance with regulation 31 of the *Regulations of the Court* to:

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I. INTRODUCTION

1. This is a request for judicial review of the decision of the Registrar, dated 3 August 2021 (“Impugned Decision”), made on behalf of Mr Ali Muhammad Ali Abd-Al-Rahman pursuant to Regulation 106(2) of the Regulations of the Court (“RoC”) and Regulation 220(1) of the Regulations of the Registry (“RoR”). This matter relates to the right of a detained person to answer a journalist’s questions in writing, following review by the Chief Custody Officer (“CCO”) pursuant to Regulation 169(1) of the RoR, which answers may be subsequently reported in the media.
2. By the Impugned Decision, made pursuant to Regulation 219(3) of the RoR, the Registrar rejected Mr Abd-Al-Rahman’s request for review of the Acting Chief Custody Officer’s decision of 16 July 2021 (“Acting CCO” and “Acting CCO’s Decision” respectively) by which Mr Abd-Al-Rahman was refused authorisation to respond in writing to a list of questions received from a Sudanese journalist. The Acting CCO’s Decision purported to be made pursuant to Regulations 169(3)(a) and (b), and “following the spirit” of Regulation 180(1)(c) of the RoR. It is noted that the Registrar appears to have abandoned any reliance on Regulations 169(3)(a) and (b) in the Impugned Decision, and now relies exclusively on Regulation 180(1)(c).
3. It is respectfully submitted that the Registrar erroneously arrived at the Impugned Decision by drawing an inapposite analogy between a *visit* to a detained person, where the purpose of such a visit is to obtain information which may be subsequently reported in the media (“Media Visit”), to the circumstances of the instant request in which Mr Abd-Al-Rahman wishes to respond *in writing* to questions provided *in writing* by a journalist, and following prior review by the CCO. By doing so, the Registrar carves out an exception from the normal

application of Regulation 169 of the RoR governing outgoing mail on the basis of Regulation 180(1)(c)'s limitation of Media Visits. According to the Registrar's position, outgoing mail may be authorised under the specific conditions provided under Regulation 169(2) and (3) of the RoR, except when they are addressed to journalists for the purpose of publication in the media. It is respectfully submitted that this exception finds no support in the legal texts of the Court, is unjustified, and amounts to a disproportionate restriction of Mr Abd-Al-Rahman's fundamental rights.

4. Having drawn this inapposite analogy, the Registrar erred by unreasonably applying Regulation 180(1)(c), which provides for a blanket prohibition on Media Visits, arguing that "[t]he policy rationale underlying regulation 180(1)(c) of the RoR [seemingly being] that no information must be obtained from detained persons for reporting in the media...would be undermined if information obtained from detained persons through other forms of interaction could be reported in the media." Regulation 180(1)(c), which relates to visits, does not prohibit the publication of detainees' views in the media. Rather, it legislates against the transmission of such views uncontrolled through prior review by the Registry. In that perspective, the proposal of a procedure by which written answers would be reviewed by the CCO pursuant to Regulation 169(1) of the RoR struck the appropriate balance between Mr Abd-Al-Rahman's right to freedom of expression and the necessity to preserve the administration of justice and good order.
5. It is important to note that the Acting CCO and the Registrar refused to authorise the outgoing mail despite having full knowledge of its contents, as it had been submitted for the Acting CCO's review under Regulation 169(1). They were thus fully aware that the proposed mail contains no information that could interfere with the administration of justice or threaten good order. Quite the opposite, Mr Abd-Al-Rahman sought to use the opportunity of communication with the media

to deliver a message of peace and reconciliation, and to express his compassion with victims. Mr Abd-Al-Rahman has repeatedly requested leave to deliver such a message and to observe a minute's silence in memory of victims in open Court.¹ Such leave has been denied three times by the Pre-Trial Chamber II and the Appeals Chamber on technical grounds.² Mr Abd-Al-Rahman used the first opportunity he was given to try to deliver his important message without prior leave.³ His message to the media is another attempt to further peace and reconciliation in his country. As such, it was fully compliant with, and actually contributed to, the Court's mandate and core values as enshrined in the Preamble to the Rome Statute. Mr Abd-Al-Rahman's willingness to contribute to peace and reconciliation in Sudan should be respected, encouraged and facilitated. Instead, the Impugned Decision blocks it.

6. Beyond being at odds with the mandate and core values of the Rome Statute, the Impugned Decision is flawed not only in terms of its erroneous application of Regulation 180(1)(c), but also because it impermissibly and disproportionately infringes upon Mr Abd-Al-Rahman's right to freedom of expression as enshrined, *inter alia*, in Article 10 of the European Convention on Human Rights ("ECHR").

II. SUMMARY OF FACTS

7. A full recitation of the facts is set out in detail in the original complaint to the Acting CCO of 30 June 2021 ("Original Complaint"), in the Acting CCO's Decision, and in the Impugned Decision. In summary, in September 2020 a Sudanese journalist requested permission of Mr Abd-Al-Rahman's Counsel to interview his client. After it was confirmed by the former CCO that no Media Visit

¹ [ICC-02/05-01/20-T-001-ENG](#), p. 22, lines 4-8 ; [ICC-02/05-01/20-175 OA2](#); [ICC-02/05-01/20-363-Red](#), par. 21.

² [ICC-02/05-01/20-T-001-ENG](#), p. 22, lines 9-12; [ICC-02/05-01/20-T-002-ENG OA2](#), p. 3, lines 5-12; [ICC-02/05-01/20-378](#), para. 19.

³ [ICC-02/05-01/20-T-010-ENG](#), p. 3, lines 21-22.

– and likely no telephone communication – could be authorised if their purpose is to obtain information which may be subsequently reported in the media, a Sudanese journalist, Mr Alghali Shaqifat of the well-respected Sudanese newspaper Assayha (available at www.assayha.net), submitted a list of written questions for Mr Abd-Al-Rahman to answer in writing. These questions, and the answers thereto, in the original Arabic and in French translation, were provided to the Acting CCO for his approbation on 23 June 2021. To date, the only concern expressed about the proposed answers related to linguistic capabilities of some detention centre staff. With no discussion as to its merits, this concern was immediately addressed and resolved by Mr Abd-Al-Rahman's agreement to delete that information from his answers, leaving no other issue with the content of Mr Abd-Al-Rahman's responses.

8. The Acting CCO refused the transmission of Mr Abd-Al-Rahman's written answers in two emails dated 25 June 2021 on the basis that "the mail cannot be allowed because I cannot allow media interviews and it is a media interview". The transmission of the written answers was also disallowed on the basis of Regulations 169(3)(b)(iii) and (iv) RoR (interference with the administration of justice, and disturbing the maintenance of security, safety and good order of the Detention Centre). This refusal resulted in the Original Complaint and the Acting CCO's Decision.

III. APPLICABLE LAW

9. Regulation 106 RoC makes provision for a complaints mechanism available to detained persons:
 1. A detained person shall have the right to file a complaint against any administrative decision or order or with regard to any other matter concerning his or her detention.
 2. The complaints procedure shall be set out in the Regulations of the Registry and shall include a right for the detained person to address the Presidency.

10. Regulation 220(1) RoR provides that:

The detained person may apply to the Presidency for judicial review of a decision of the Registrar taken under either regulation 218, sub-regulation 5 or regulation 219, sub-regulation 3, within 7 calendar days of its notification.

11. Regulation 180(1)(c) RoR – which relates to the granting of permission for visits to a detained person at the detention centre – provides that such permission should be withheld if the CCO has reasonable grounds to believe that the “purpose of the visit is to obtain information which may be subsequently reported in the media.”

12. Article 10 ECHR guarantees in relevant part that:

1. Everyone has the right to freedom of expression. This right shall include freedom to hold opinions and to receive and impart information and ideas without interference by public authority and regardless of frontiers [...]

2. The exercise of these freedoms, since it carries with it duties and responsibilities, may be subject to such formalities, conditions, restrictions or penalties as are prescribed by law and are necessary in a democratic society, in the interests of national security, territorial integrity or public safety, for the prevention of disorder or crime, for the protection of health or morals, for the protection of the reputation or rights of others, for preventing the disclosure of information received in confidence, or for maintaining the authority and impartiality of the judiciary.

13. Article 3 of the European Prison Rules (“EPR”)⁴ provides that:

Restrictions placed on persons deprived of their liberty shall be the minimum necessary and proportionate to the legitimate objective for which they are imposed.

14. Article 24.12 of the EPR provides that:

Prisoners shall be allowed to communicate with the media unless there are compelling reasons to forbid this for the maintenance of safety and security, in the public interest or in order to protect the integrity of victims, other prisoners or staff.

⁴ Available at <https://rm.coe.int/european-prison-rules-978-92-871-5982-3/16806ab9ae>

IV. SUBMISSIONS

A. *Regulation 180(1)(c)*

15. It is submitted that Mr Abd-Al-Rahman should be permitted to provide written answers to the questions sent by Mr Shaqifat. The Registrar correctly recognised that “[t]he matter at hand is not explicitly addressed by the RoR or the Regulations of the Court.” Only Media Visits are prohibited. That prohibition is absolute and is not challenged.
16. The Regulations, on the other hand, do not prohibit detained persons communicating with others by mail (see Regulation 168 RoR *et seq.*) even if the purpose of that communication is to obtain information which may be subsequently reported in the media.
17. The Registrar opines that “[t]he policy rationale underlying regulation 180(1)(c) of the RoR seems to be that no information must be obtained from detained persons for reporting in the media.” That conclusion cannot be right. Firstly, as he implicitly acknowledges by virtue of his use of the words “seems to be”, the Registrar founds his argument on conjecture.
18. Secondly, had the drafters of the RoR – i.e. the Registry with approval by the Presidency pursuant to Rule 14(1) of the Rules of Procedure and Evidence (“RPE”) – intended to confer powers on the CCO to not deliver incoming or outgoing mail where the purpose of the correspondence was to obtain information which may be subsequently reported in the media, such a provision would have been included in Regulation 169(3). The Registry did not find it necessary to prohibit outgoing mails to the media when it drafted, and subsequently amended, the RoR. This choice was approved by the Presidency. It cannot now be revisited by way of an individual decision denying authorisation of that which is otherwise allowed under the current RoR. Should the Registrar be convinced, as he states in

the Impugned Decision, that no outgoing mail should be addressed to journalists for the purpose of their publication in the media, the appropriate way of enforcing such a new rule would be an amendment to the existing RoR, which would apply in the future pursuant to Regulation 4(3) of the RoR. Until the time such an amendment is promulgated, outgoing mail to journalists is and remain authorised following prior review of their contents by the CCO under Regulation 169(1) of the RoR.

19. Thirdly, quite different considerations are at play in a policy prohibiting Media Visits. Such a policy is entirely proportionate and legitimate given that the detention centre authorities would have very little control over the nature and content of information that may be transmitted by the detained person during such a Media Visit. The only control that could be exercised would necessarily be *post facto* pursuant to Regulation 183(2) RoR, by which time the visitor might already be in possession of information the detainee wished to transmit.
20. This rationale, however, simply cannot apply to Mr Abd-Al-Rahman's request where the nature and content of both questions and answers have been submitted for review by the Acting CCO before transmission in accordance with Regulation 169(1) of the RoR. The Acting CCO is in a position to require the removal of any answers that might be considered confidential or too sensitive for reporting in the media. In the instant case, the Acting CCO's sole concern about mentioning the linguistic capabilities of some detention centre staff was addressed and resolved by the deletion of that information, with no discussion as to its merits. The Acting CCO thus had and exercised complete control over the nature and content of the information communicated.
21. Contrary to the suggestion made at paragraph 14 of the Impugned Decision, it was unreasonable for the Registrar to conclude that: "That rationale would be undermined if information obtained from detained persons through other forms of interaction could be reported in the media." The Registrar fails to take into

account the fact that control can be and has been exercised over Mr Abd-Al-Rahman's written responses to the written questions in ways that simply do not exist in the context of Media Visits. That control has been exercised with the full cooperation and adherence of Mr Abd-Al-Rahman.

22. The former CCO clearly acknowledges that, in a situation such as Mr Abd-Al-Rahman's that is not caught by Regulation 180(1)(c), authorisation to communicate in writing with a journalist in a particular case could be sought from the Registrar (see email of former CCO, 15 September 2020, 15:20 hours). His email demonstrates his recognition – correctly – that there is no blanket prohibition on the transmission of information that may be subsequently reported in the media, irrespective of the mode of transmission, as long as it is submitted for proper review pursuant to Regulation 169(1) of the RoR. The former CCO's position was both reasonable and in accordance with the current provisions of the RoR. Unlike the Acting CCO and the Registrar, the former CCO correctly interpreted the relevant provisions of the RoR, balancing full respect for Mr Abd-Al-Rahman's right to freedom of expression, and without alleging a baseless prohibition of communication with journalists by way of properly controlled outgoing mail.

B. *Freedom of expression*

23. Among other legal texts protecting international human rights and fundamental freedoms, Article 10 of the ECHR provides for the right of freedom of expression. The right can be limited, but any limitations are subject to a proportionality test. Minimum international standards make it clear that respect for the right to freedom of expression cannot be dispensed with merely by virtue of the fact the person asserting the right is in detention. The EPR provide guidance for how detainees' freedom of expression must be observed in practice: restrictions shall

be the minimum necessary and proportionate to the legitimate objective for which they are imposed.⁵

24. Further, Article 24.12 EPR makes it clear that detainees' shall be allowed to communicate with the media unless there are compelling reasons to forbid it. A blanket prohibition on contact with the media of the kind suggested in the Impugned Decision is evidently neither necessary nor proportionate. Contrary to the Impugned Decision, it is submitted that the drafters of the RoR – i.e. the Registry with approval by the Presidency – could not have intended an unnecessary and disproportionate blanket prohibition on detainees' contact with the media, particularly written contact submitted for review by the CCO.
25. It is submitted that the approaches of other international courts and tribunals to the issue of the right of detainees to freedom of expression provide further support to the proposition that the drafters of the Regulations never intended to prohibit written communication with journalists.
26. In 2003, the President of the Special Court for Sierra Leone recognised that an unconvicted detainee retains the right to freedom of expression:

[Chief Hinga Norman] possesses, even as an indictee remanded in custody, a qualified right to freedom of speech. That right must be capable of assertion, in some meaningful way, to answer, if he wishes, any allegations that have been made against him in another forum: particular resonance attaches to free speech when it is sought as a "right to reply". He is entitled to set out his own account for posterity. The practical question concerns only the method by which this should be done whilst he awaits his trial.⁶

⁵ EPR, Article 3.

⁶ *The Prosecutor v. Norman*, Case No. SCSL-2003-08-PT, Decision on Appeal by the Truth and Reconciliation Commission for Sierra Leone ("TRC" or "The Commission") and Chief Samuel Hinga Norman JP Against the Decision of His Lordship, Mr Justice Bankole Thompson Delivered on 30 October 2003 to Deny the TRC's Request to Hold a Public Hearing with Chief Samuel Hinga Norman JP, 28 November 2003, ("*Norman Decision*") para. 18.

27. The *Norman* Decision addressed the matter of the right of a detainee to answer questions from commissioners of the Truth and Reconciliation Commission for Sierra Leone rather than directly with representatives from the media. However, it was recognised that the answers could nevertheless be published:

There was not, indeed never has been, any inhibition against an indictee volunteering or communicating information to the TRC in writing, either directly or through his lawyers.⁷

[...]

Although the indictee here may well wish to discuss political issues, the important distinction is that he is unconvicted and may to that extent be accorded more freedom. But that freedom is bounded, nonetheless, by the requirements to exercise it compatibly with his status as an indictee, which for present purposes means in a manner that gives rise to no real apprehension that it will disturb the fair trial process which he and others are obliged to go through.⁸

[...]

In my judgement, Chief Sam Hinga Norman is entitled to testify to the TRC... This in my judgement can be achieved by evidence prepared by him in writing (with the benefit of legal advice) and sworn in the form of an affidavit... What public use, if any, is made thereafter of that affidavit will be a matter for the TRC and for the detainee and his lawyers.⁹

28. In 2009, the Vice-President of the International Criminal Tribunal for the former Yugoslavia was seized of a number of requests from Radovan Karadžić to be permitted to meet with the media. The Vice-President noted that Rule 61 of the ICTY Rules of Detention imposes a total ban on face-to-face visits between detainees and journalists, but found *obiter* that, “Provided that detainees have alternative means of communication with the media (as envisaged by Rule 64bis), Rule 61 does not appear to be an unreasonable restriction *per se*.”¹⁰ Rule 64bis of the ICTY Rules of Detention¹¹ specifically authorised the use of communication facilities, such as outgoing mail, by a detainee “for the sole purpose of contacting

⁷ *Norman* Decision, para. 21.

⁸ *Norman* Decision, para. 40.

⁹ *Norman* Decision, para. 41.

¹⁰ *The Prosecutor v. Karadžić*, Case No. IT-95-5/18-PT, Decision on Radovan Karadžić’s Request for Reversal of Denial of Contact with Journalist, 12 February 2009 (“*Karadžić* Decision”), para. 16.

¹¹ IT/38/Rev. 10, [Rules Governing the Detention of Persons Awaiting Trial or Appeal before the Tribunal or Otherwise Detained on the Authority of the Tribunal](#) (as amended on 15 November 2016), Rule 64bis.

the media directly or indirectly”, with prior approval by the Registrar. Apart from the authority of the Registrar, instead of the CCO, to review outgoing mail, Rule 64*bis* of the ICTY Detention Rules is thus the equivalent of Regulation 169 of the RoR. The prohibition of Media Visits under Rule 61 of the ICTY Rules of Detention – equivalent to Regulation 180(1)(c) of the RoR – is thus found reasonable subject to the caveat that properly vetted outgoing mail to the media remain authorised under Rule 64*bis* of the ICTY Rules.

29. Critically, the Vice-President found that the practice of the ICTY Registrar in arriving at determinations on detainee’s communication with the media “evinces a blanket denial of all interactive contact with the media, which would run contrary to the doctrine of procedural fairness.”¹²
30. As mentioned in paragraph 2 above, the Impugned Decision has abandoned any reliance on Regulations 169(3)(a) and (b) RoR, and is founded exclusively on Regulation 180(1)(c) RoR. However, for the sake of completeness, it is instructive to note that the Vice-President in *Karadžić* considered the ICTY Registrar’s contention “that he would deny the Applicant any form of contact with the media because the purpose of the Applicant's contact would disturb the good order of the UNDU”:

I do not consider this conclusion reasonable. It seems quite apparent to me that it is possible for the Applicant to contact the media in such a way that does not compromise the security and safety of the UNDU as described in the Registrar's Submission.¹³

31. The Vice-President took three further matters into consideration when allowing Mr Karadžić’s request: (i) the power of the Commanding Officer of the Detention Centre to impose conditions of monitoring/supervision on communications between detainees and others as he or she deems necessary;¹⁴ (ii) the availability

¹² *Karadžić* Decision, para. 18.

¹³ *Karadžić* Decision, para. 19.

¹⁴ *Karadžić* Decision, para. 21.

of the precaution of warning the journalist of her obligations as a member of the press and her exposure to contempt proceedings before the Tribunal;¹⁵ and (iii) the personal circumstances of the Applicant:

the Registrar has not cited any behaviour on the part of the Applicant which indicates that he intends to undermine the Tribunal's mandate. The Applicant has not made an excessive or unreasonable number of requests of this nature, and the topic for discussion is limited and has been disclosed to the Registrar. These are relevant facts for the Registrar to take into account when considering the request, more so than speculation as to the type of report [the journalist] may publish.¹⁶

32. All three of these further matters apply *a fortiori* to the instant request for review.

The Acting CCO can monitor all written communications between Mr Abd-Al-Rahman and Mr Shaqifat pursuant to Regulation 169(1) RoR; indeed, the Acting CCO and Registrar already have the written questions and proposed answers before them. The same possibility exists for the Registrar to warn Mr Shaqifat of his obligations as a member of the press and his exposure to contempt proceedings before the Court. Finally, the Registrar has not cited any behaviour on the part of Mr Abd-Al-Rahman which indicates that he intends to undermine the Court's mandate. On the contrary, the content of his responses to the journalist's questions delivers a message in favour of peace and reconciliation in Sudan, which furthers the Court's mandate and core values as enshrined in the Preamble of the Rome Statute.

33. The Vice-President allowed Mr Karadžić to contact the journalist "remotely via written correspondence, telephone calls, or whatever other means the Registrar deems appropriate", ordering that all communications between them be monitored, and that the journalist be put on notice of her exposure to possible contempt proceedings.¹⁷ In the instant matter, Mr Abd-Al-Rahman limited his

¹⁵ Karadžić Decision, para. 21.

¹⁶ Karadžić Decision, para. 22.

¹⁷ Karadžić Decision, para. 24.

communication to the most secure means of properly reviewed outgoing mail specifically provided for by Regulation 169 of the RoR.

34. The ICTY Registrar subsequently decided that the journalist “should contact [Mr Karadžić] in writing, and that any response from [Mr Karadžić] should be transmitted to her in writing,”¹⁸ a conclusion the Vice-President subsequently found to be reasonable (and which is precisely what Mr Abd-Al-Rahman has been asking for):

[it] took into consideration relevant factors and observed basic rules of natural justice and procedural fairness, appropriately balancing the Applicant's right to freedom of expression with the obligation of ensuring that confidential information from proceedings before the International Tribunal is not inappropriately disclosed.¹⁹

V. CONCLUSION

35. The Court's legal texts do not provide for a blanket prohibition on communications intended for publication between a detainee and a journalist. They only provide for a blanket prohibition on Media Visits. This is because Media Visits cannot be subject to adequate control by the Detention Centre authorities. Written communication intended for publication between a detainee and a journalist can be and have been adequately controlled by the Detention Centre authorities pursuant to Regulation 169 of the RoR, with full cooperation and adherence on behalf of Mr Abd-Al-Rahman. This mode of communication represents the sole possible reasonable and proportionate limitation on a detainee's freedom of expression. The Registrar erred in concluding otherwise, thereby preventing Mr Abd-Al-Rahman from seeking to contribute, in his own

¹⁸ *The Prosecutor v. Karadžić*, Case No. IT-95-5/18-PT, Decision on Request for Reversal of Limitations of Contact with Journalist, 21 April 2009, (“Second *Karadžić* Decision”), para. 3.

¹⁹ Second *Karadžić* Decision, para. 25. See also *The Prosecutor v. Karadžić*, Case No. IT-95-5/18-T, Decision on Radovan Karadžić's Request for Reversal of Limitations of Contact with Journalist: Russia Today, 6 November 2009.

limited way, to peace and reconciliation in Sudan, which forms part of the mandate and core values of the Court under the Preamble of the Rome Statute.

36. For the foregoing reasons, the Presidency is respectfully requested to:

- (i) quash the Impugned Decision;
- (ii) declare that detainees at the Detention Centre have the right to communicate with the media in writing (subject to the regime for review provided for by Regulation 169(1) RoR); and
- (iii) order the Acting CCO to permit the transmission of Mr Abd-Al-Rahman's written answers to Mr Shaqifat, as amended at the request of the Acting CCO, without delay.



Mr Cyril Laucci,
Lead Counsel for Mr Ali Muhammad Ali Abd-Al-Rahman

Dated this 10th day of August 2021

At Marseille, France