

2020 International Criminal Court Moot Court Competition Problem

Case before the International Criminal Court (ICC): Prosecutor v. Cersei Bannister of Valaria

Appeal from the Pre-Trial Chamber’s Decision on Confirmation of Charges

This is a fictional case intended to enable students to familiarize themselves with the law and practice of the ICC. Participating teams will be divided into three groups: (1) Counsel for the Defendant, (2) Counsel for the Prosecution, and (3) Counsel for the state of Valaria participating in the proceedings under Article 19(2)(c) of the Rome Statute. In accordance with the rules of the competition, each team shall write a Memorial for each of these groups, setting forth its legal arguments in the context of the interlocutory appeal by Defendant, Cersei Bannister, challenging the jurisdiction and admissibility of the ICC in the context of the Pre-Trial Chamber’s Decision on Confirmation of Charges, under **Article 82(1)(a) of the ICC Statute**.

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

Pursuant to Pre-Trial Chamber VI’s decision to grant the “Defense Request for Leave to Appeal Issues in the Confirmation of Charges Decision” (dated **March 15, 2020**), the Appeals Chamber seeks submissions of all parties and participants on the following issues:

- a. Whether there are substantial grounds to believe one or more of the posts by the Dragos group made on the social networking platform, Statusphere, between January 2018 and January 2020 constituted direct and public incitement of genocide under Article 25(3)(e) of the ICC Statute?
- b. Whether Cersei Bannister, owner and CEO of the social networking company Statusphere can be held criminally responsible for inciting genocide under Article 25(3)(e) of the ICC Statute and/or providing the means to incite genocide under Article 25(3)(c) of the ICC Statute by allowing users to post statements that may constitute incitement to genocide and failing to take the appropriate action to immediately remove and block such posts on the social networking platform that she controls?
- c. Whether the ICC has jurisdiction to prosecute Cersei Bannister under Article 12 of the ICC Statute, considering that all of her actions related to the charges of incitement and

providing the means to incite genocide occurred in her State of nationality, Valaria, which is not a party to the ICC?

[This is a fictional document for use in the ICC Moot Court Competition]

Pre-Trial Chamber VI
2020 ICC Moot Court Competition

Prosecutor v. Cersei Bannister of Valaria

**Confirmation of Charges against
Defendant Cersei Bannister of Valaria**

Pre-Trial Chamber VI of the International Criminal Court (ICC) renders this decision on the application filed by the Defendant, Cersei Bannister, challenging the jurisdiction of the ICC in the context of the confirmation of the charges of incitement to genocide and providing the means to incite genocide.

Introduction

1. This case constitutes several “firsts” for this Court. It is the first case to address whether coded statements on a private social networking group site can constitute direct and public incitement to genocide. It is the first case to address whether the owner/CEO of a social networking platform can be criminally responsible for failure to remove and block posts inciting genocide. And it is the first case to address whether the ICC has jurisdiction over acts in cyberspace that had an impact in the territory of a State Party where the social networking platform is located in a State that is not a party and the Defendant is a national of a Non-Party State.

Factual Background

2. There is no dispute about the essential facts of this case. The only disagreement is about their legal significance. Paragraphs 3-18 summarize factual stipulations that were agreed to by the three parties to this case (Prosecutor, Defense, and State of Valaria) for purposes of this proceeding. The parties have also verified the transcript of two interviews between a newspaper reporter and the Defendant that are reproduced in full in **Appendixes 1 and 2** of this opinion, and form part of the factual record of this proceeding.

3. **Governing Treaties:** This case focuses on actions occurring in two States separated by the 100 mile-wide Neereen Sea: The State of Solantis (to the East) and the State of Valaria (to the West). See map reproduced at **Appendix 3** of this opinion. The State of Solantis is a party to the Rome Treaty, which it ratified on 3 January 2017. Valaria has not yet ratified the Rome Treaty. Solantis and Valaria are members of the U.N. and parties to the International Covenant on Civil and Political Rights, and the Convention on the Prevention and Punishment of the Crime of Genocide. They do not have a bilateral extradition treaty and are not party to other treaties relevant to the subject matter of the case.

4. Ethnic Groups in Valaria and Solantis: Valaria has a population of 10 million people. Solantis has a population of 5 million people. Both States speak the same language, Valarian, but the dialects of the two countries differ somewhat. The population of Valaria used to be composed of two ethnic groups, the Nothroki and the Stareks, but in the 19th century the Stareks were expelled from Valaria, and its population is now entirely Nothroki. The population of Solantis is composed of 97 percent Nothroki and 3 percent Stareks. The Starek people have been compared to the Roma of Europe. They have their own language with roots in Sanskrit, but also speak Valarian, the official language of the State of Solantis. They are largely itinerant, home-schooled, and widely perceived by the Nothroki population to be responsible for high rates of crime. The Starek people are concentrated in Starek community trailer parks at the foot of the Stony mountains on the east of Solantis and gather at worship centers to celebrate Starek ethnic holidays twelve times each year. For hundreds of years there has been widespread discrimination and periodic acts of violence by the Nothroki ethnic group directed against the Stareks in Valaria (before their expulsion) and in Solantis (continuing to this day).

5. Economic conditions in Valaria and Solantis: The State of Valaria is a technologically advanced country, with a sophisticated information technology-based economy and a GDP of \$25 billion. Valaria is home to several large tech companies, including Statusphere, a privately-owned social network company directed at people of Nothroki ethnicity. Solantis is a developing country with a GDP of \$2 billion based on farming, fishing, and production of textiles. Both States have democratic forms of government and independent judiciaries.

6. The Defendant: Cersei Bannister is a 30-year-old citizen of Valaria who has lived in Valaria all her life. Soon after graduating with a PhD in Computer Science from the prestigious Valaria Institute of Technology in May 2017, Bannister launched a social network platform somewhat similar to Facebook called Statusphere. The company is headquartered in Valaria's capital city. Its servers are located in its headquarters building. Its logo is a galloping horse and its tag line is "a social network for the Nothroki people." Dr. Bannister is the controlling owner and Chief Executive Officer of Statusphere. Statusphere has 7 million active users in Valaria and 3 million in Solantis where it has become a popular source of information for citizens to obtain news, weather forecasts, and government information. Use of Statusphere by individuals and groups is free; the majority of Statusphere's revenue is from pop up ads.

7. Growing ethnic strife in Solantis: In 2017, a Nothroki extremist group committed to the ethnic purity of Solantis and calling itself "Dragos" was established. Members often wear shirts with a galloping horse drawn on them. Soon after its establishment, members of Dragos began to attack the Starek people through random assaults. Between January 2017 and December 2017, such attacks were responsible for 23 Starek deaths. The State of Solantis has a small police force and virtually no army, making it difficult for it to respond effectively to such acts of random violence. In January 2018, Dragos had 1,000 members, who belonged to a Statusphere affinity group called "Dragos Initiative." A user must specifically sign up for the group to view its posts; postings cannot be viewed by the general public. By December 2018, Dragos had doubled in size to 2,000 members and had become increasingly more violent toward the Starek people. Today, Dragos has 4,000 members.

8. **The role of Statusphere in the attacks on the Stareks:** Based on in-country interviews and other sources, on 25 May 2019, the UN High Commissioner for Human Rights issued a report on the situation in Solantis that concluded that increasing violence against the Starek people of Solantis was linked to posts made on Statusphere by members of the Dragos extremist group. The High Commissioner stated that starting in January 2019 posts on Statusphere’s e-bulletin board would encourage Dragos members to “break down those widgets,” which the High Commissioner concluded was an ethnic slur used by members of Dragos to refer to the Starek people. Other posts extolled Dragos members to “pound the widgets,” “clean up the widgets,” and “put the widgets in cold storage.” Prompted by these coded calls to violence, groups of the Dragos attacked Stareks outside their worship centers, sporting events, concerts, fairs and trailer parks, beating them with metal pipes and bats, resulting in hundreds of injuries and over 150 Starek deaths in the first five months of 2019.

9. As soon as he read the UN High Commissioner’s report, on 26 May 2019, the President of Solantis, Theon Palejoy, emailed Cersei Bannister and asked her to remove the Dragos posts on Statusphere in light of the Commissioner’s findings. Bannister replied in an email later that day that Statusphere has a community standards policy, under which the company “will remove content and shut down groups when we believe there is a genuine risk of physical harm or direct threats to public safety.” Pursuant to the findings of the UN High Commissioner, Bannister promised President Palejoy that Statusphere would immediately close down the Dragos Initiative group and remove its e-bulletin board page from Statusphere.

10. Soon after the removal of the Dragos Initiative group, a new group page was created on Statusphere called “Dragos Ambition,” which attracted the same type of anti-Starek posts as the previous “Dragos Initiative” group e-bulletin board. Despite Palejoy’s follow-up email requests to Bannister to remove the Dragos Ambition e-bulletin board over the next several months, Bannister declined to do so, saying that there was no evidence of direct threats to public safety. Meanwhile, Dragos members continued to post repellent statements about “widgets” on the Dragos Ambition group e-bulletin board on Statusphere which corresponded with increasing hostile acts against the Starek people.

11. One of the worst attacks occurred on 16 June 2019, a Starek holy day marked by communal celebration. That morning, a member of the Dragos Ambition posted on the group’s e-bulletin board on Statusphere that “it is time for a widget roast. Tonight – 7:00 PM, 12 Liberty Blvd.” That evening at 7:00 PM, several dozen individuals wearing shirts emblazoned with a galloping horse gathered outside the Starek worship center located at 12 Liberty Blvd in Solantis City, which was then full of hundreds of Starek worshipers. Members of the group locked the door from the outside and threw incendiary devices into the Starek worship center, while yelling “burn, widgets, burn!” By the time the police and fire departments arrived at the scene it was too late. The perpetrators had fled and 200 Starek men, women, and children died in the fire. There were no arrests.

12. The next day (17 June) Jonah Mormant, an award-winning journalist from the *Solantis Gazette* called Cersei Bannister and asked her why Statusphere had not immediately removed the Dragos Ambition call to violence from its social media platform. Bannister told Mormant that

the Statusphere content monitors had trouble properly interpreting the dialect in which the message was written. Bannister has given Mormant permission to provide the transcript of the full interview to the Court and has verified its contents. It appears at **Appendix 1**.

13. That same day, Statusphere removed the Dragos Ambition group from its site. But within twenty-four hours, a new Dragos group was established on Statusphere called “Dragos Aspiration.” Immediately, posts began appearing on the Dragos Aspiration group e-bulletin board stating that the 16 June attack was “a good first step toward achieving the Dragos objective of ethnic purity in Solantis.”

14. A segment of the Solantis population began to speak out against the increasing violence against the Stareks. In the fall of 2019, a Solantis politician of **Nothroki** ethnicity named Ayra Gendry campaigned for Parliament on a platform advocating the enactment of new laws that would protect the Starek people, expand the police force, and enable the Solantis government to prosecute individuals who incited violence against the Stareks using the internet. The week before the parliamentary election, which was scheduled for 7 November 2019, opinion polls showed Gendry in a virtual tie with her opponent for the parliamentary seat.

15. On 6 November 2019, the day before the election, an individual posted a message on the Dragos Aspiration group e-bulletin board urging Dragos members to “go to the voting sites near the Starek trailer park communities and do what must be done to prevent the widgets from gaining power.” The posting identified four major voting centers where Stareks were likely to be in high attendance: Precinct 17, Precinct 24, Precinct 41 and Precinct 53. The next day, hundreds of armed individuals wearing shirts adorned with a galloping horse arrived at the four voting centers and began shooting indiscriminately into the line of voters, killing 400 Stareks as well as 43 Nothrokis, including several government poll workers. Media reports of the tragedy galvanized supporters of Ayra Gendry who won a parliamentary seat in a landslide.

16. On 8 November 2019, Jonah Mormant of the Gazette called Cersei Bannister for comment on Statusphere’s role in the so-called “Election Day Massacre.” The newspaper story quotes Bannister as saying that the Statusphere content monitors had brought the 6 November Dragos Aspiration post to her attention, but she and her staff did not interpret it as a call to violence but rather a call to campaign and vote. Bannister has given Mormant permission to provide the transcript of the full interview (**reproduced at Appendix 2**) to the Court and has verified its contents. Once again, after the attack, Statusphere removed the offending group from its social media platform.

17. The first statute enacted by the newly elected Solantis Parliament, on 15 November 2019, was a law enabling the prosecution of those who incite violence against minority groups in Solantis using the internet. Despite the new law, during November and December of 2019, the pattern of postings and violence continued to repeat. Dragos extremists established new groups on Satusphere, using the names “Dragos Mission,” “Dragos Yearning,” “Dragos Dream,” and “Dragos Desire.” Members posted veiled messages advocating “an end to the widgets,” “driving out the widgets,” and “cleansing the widgets,” while listing a time and place where Stareks were known to be gathering, including concerts, fairs, sporting events, and ethnic holiday celebrations.

Each message was followed by violent attacks. Bannister's response was always the same. She claimed the Statusphere content monitors did not recognize the messages as calls to violence and then closed down the offending group site after each bloody attack. By 1 January 2020, the death toll was up to 1,500 Stareks (including the attacks on 16 June and 7 November 2019). Fearing unchecked violence, in December 2019 and January 2020 more than 50,000 Stareks fled to several neighboring States, where they requested refugee status, citing a well-founded fear of persecution by the Dragos. Valaria did not allow any of the Stareks to enter its borders.

18. By January 2020, a dozen members of the Dragos group had been arrested under the new law, and the government of Solantis is still investigating other members of Dragos at this time. On 5 January 2020 Solantis made a request to Valaria to surrender Cersei Bannister for prosecution under this law or to commence its own domestic prosecution. Valaria denied the request on the grounds that the two States do not have a bilateral extradition treaty and that Valarian law does not criminalize the conduct of which Bannister is accused.

Proceedings before the ICC

19. Unable to gain custody to prosecute her herself, Solantis referred the matter of Cersei Bannister to the ICC for prosecution on 15 January 2020 under Article 14 of the ICC Statute. The ICC Prosecutor determined that there was a reasonable basis to proceed with an investigation into whether Bannister's actions constituted incitement to genocide as defined by Article 25(3)(e) of the ICC Statute and providing a means to incite genocide under Article 25(3)(c) of the Statute. Pursuant to Article 15(3) of the Court's Statute, the Prosecutor submitted a request on 30 January 2020 to the Pre-Trial Chamber to initiate an investigation into Bannister's alleged incitement. On 6 February 2020, the Pre-Trial Chamber granted the Prosecutor's request to authorize an investigation and to issue a warrant for the arrest of the Defendant, Cersei Bannister, for inciting genocide under Article 6, Article 25(3)(e), and Article 25(3)(c) of the ICC Statute. The next day, Cersei Bannister made a voluntary appearance at the ICC to contest jurisdiction and admissibility of this case. The ICC immediately appointed her Defense Counsel pursuant to Article 55 of the ICC Statute and Rule 22 of the Rules of Procedure and Evidence. Prosecutions against members of Dragos for incitement and attempted genocide, as well as crimes against humanity and ordinary murder, are taking place in Solantis pursuant to national law.

The objections of the Defense

20. In a written submission dated 15 February 2020, Counsel for Cersei Bannister raised several objections to the jurisdiction of the ICC and admissibility of the case, which the Pre-Trial Chamber agreed to consider at a hearing on Confirmation of Charges under Article 61 of the Court's Statute:

First, the Defense argued that the posts made on Statusphere between January 2018 and January 2020 by members of Dragos do not constitute incitement to genocide under Article 25(3)(e) of the Rome Statute as the posts were made to a private internet group; thus, they were not public as required for charging incitement. The Defense further

argued that the language of the statements made by Dragos members do not reflect genocidal intent as opposed to merely incitement to commit other crimes. And the Defense finally argued that the impact of the statements was too small to constitute incitement to genocide under international law and precedent, or to meet the gravity requirement of the ICC Statute.

Second, the Defense argued that Cersei Bannister cannot be held criminally liable for incitement to genocide as she, herself, did not make any violent posts on Statusphere. The Defense argued that Article 25(3)(e) of the Rome Statute was created to prosecute those who actively incite genocide, not individuals who failed to perform an action that might prevent an attack. Additionally, the Defense argued that based on precedent, the defendant must have a specific intent to incite genocide, and there is no evidence that Bannister had any such intent.

Third, the Defense argued that the ICC does not have jurisdiction over this case, as the preconditions established under Article 12 of this Court's statute are not met. The Defense argued that the case was not referred to the Court by the Security Council, and therefore the place of the act or the nationality of the perpetrator must be a State party. Cersei Bannister is a national of Valaria, she resides in Valaria and all her actions occurred in Valaria -- a state that is not a party to the ICC.

Findings and Conclusions

21. On February 28, 2020, representatives of the ICC Office of the Prosecutor, Counsel for Cersei Bannister, and Counsel for the State of Valaria submitted briefs and made oral presentations before this Pre-Trial Chamber on the issues raised by the Defense. Cersei Bannister was present during the proceedings. After duly considering their submissions and arguments, the Pre-Trial Chamber hereby makes the following findings and conclusions:

First, the Pre-Trial Chamber determines that there are substantial grounds to believe that the statements made by members of Dragos on 16 June 2019 and 6 November 2019 in posts on Statusphere constitute incitement to genocide based on international law and precedent related to this crime.

Second, the Pre-Trial Chamber determines that the Defendant's failure to take action to immediately remove the statements advocating violence against the Starek people and to effectively prevent their reposting on the social networking site that the Defendant controlled can render her criminally responsible for incitement to genocide under Article 25(3)(e) of the Rome Statute and providing the means for incitement under Article 25(3)(c) of the Rome Statute.

Third, the Pre-Trial Chamber determines that the Court does have jurisdiction in this case under Article 12 of the ICC Statute because there is a cyberspace connection between the actions of Cersei Bannister and the effects that occurred in Solantis which is a party to the ICC.

For these reasons, the Pre-Trial Chamber hereby:

Determines that the posts made by Dragos members on the Statusphere social networking site on 16 June 2019 and 6 November 2019 may be prosecuted as incitement to genocide.

Determines that Cersei Bannister, the owner/CEO of Statusphere, may be prosecuted for incitement to genocide and providing the means for incitement in relation to the 16 June 2019 attack on the Starek worship center and the 7 November 2019 attack on the voting centers based on her failure to remove from the social networking site posts advocating violence against the Starek ethnic minority of Solantis in a timely manner and to prevent their reposting.

Determines that the preconditions set forth in Article 12 are met in this case because of the unique properties of cyberspace and the principle of effects jurisdiction.

Determines that the case is of sufficient gravity to justify further action by the Court.

Confirms the that the Prosecutor has supported the charges of incitement and providing the means for incitement with sufficient evidence to establish substantial grounds to believe that Cersei Bannister is criminally liable for the charges against her.

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

Dissent by Judge Vexatious:

I found the arguments of the Defense on issues 2 and 3 (see para. 20 above) persuasive and I therefore dissent from the Decision of the Pre-Trial Chamber and urge the Chamber to certify the case for interlocutory appeal.

[Signed] Judge Friendly, Judge Learned, and Judge Vexatious (Dissenting)

**Dated 15 March 2020
At The Hague, The Netherlands**

Appendix 1

Transcript of interview of Cersei Bannister by Jonah Mormant, *Solantis Gazette*, 17 June 2019, verified by the Defense.

Mormant: Hello Dr. Bannister, this is Jonah Mormant from the *Solantis Gazette*. Your Communications Director gave me your number. Can I ask you some questions about the Statusphere social media network?

Bannister: Hello Jonah. I'd be happy to talk with you.

Mormant: Can you tell me how your social networking site works? How does someone sign up for membership in one of the affinity groups?

Bannister: The first step is to sign up for membership in Statusphere itself. For that, all you need to do is log on to our home page, and provide your name, email address, and a password that you come up with. You can then upload text, videos, and photos, to share with friends on our site. And it's all free. We also have two dozen private affinity groups that you can join. For example, we have a group of fans of the Valaria national football team, a group for devotees of the Game of Thrones television series, and a cooking group. To join a group, you click on the icon for groups, scroll down to the name of the group you want to join, and click that. Then you provide a fictional nom de guerre so that you can post anonymous messages on the group's e-bulletin board which can only be read by other members of the group.

Mormant: Have you heard about the attack last night on a Starek worship center in Solantis City? The news media are reporting that two hundred Starek worshipers were killed when a group of individuals wearing t-shirt emblazoned with the sign of Dragos locked the doors from the outside and tossed Molotov cocktails through the windows of the building. According to one news report, on the morning of the attack, there was a post on the Dragos Initiative group's e-bulletin board on Statusphere that said: "It is time for a widget roast. Tonight – 7:00 PM, 12 Liberty Blvd." That's the address of the Starek worship center that was attacked. Do you feel that Statusphere has some responsibility for this attack?

Bannister: Not at all. Statusphere has a policy against posts on our group e-bulletin boards that advocate violence. If such a post is made, then Statusphere emails the person who wrote the post, informs them of the policy against using our e-bulletin board to promote violence, and removes the post within 24 hours. If the violent posts are systematic, Statusphere will close down the group site where they are being posted. We feel this is a reasonable way to approach the problem.

Mormant: Did Statusphere immediately contact the person who wrote the 16 June post about attacking the Starek warship center?

Bannister: As you know, Jonah, while Solantis and Valaria share a common language, the Valarian dialect in the two countries is as different as Quebec French is from Parisian French.

The grammar, idioms, and vocabulary differ quite a bit. In this case, our content monitoring team believed the post read “It is time for those of the faith to see the light.” It wasn’t until after we heard the news last night of the attack on the worship center that we realized that the post may have been an instigation to violence. In an abundance of caution, this morning we removed the Dragos Ambition group affinity site where the post was shared.

Mormant: Even if you had known the meaning of the post, your policy of removing violent posts 24 hours after they have been uploaded to an e-bulletin board doesn’t seem fast enough to prevent a more immediate call to violence as in this case?

Bannister: We respond as fast as we can but we are a small company with a staff of only eighteen people, including web designers, marketing specialists, financial personnel, and a few content monitors.

Mormant: You said you closed down the Dragos Ambition group site. Didn’t you earlier close down the Dragos Initiative group site? What is to stop the Dragos extremists from establishing a new Dragos group site on Statusphere tomorrow?

Bannister: The Dragos have a right to their opinions. And they are welcome to express them on our social networking platform. It’s only when they advocate immediate violence that we will bar their access.

Mormant: It sounds like you are sympathetic to their goal of ethnic purity?

Bannister: Well, that is the history of Valaria. And we now have a peaceful and thriving society. Everyone knows how much trouble the Stareks can be. They are unclean and prone to criminal behavior. Solantis would be better off without them.

Mormant: How do members of Dragos find the new group sites after you shut down the old group?

Bannister: There are pop up ads on Statusphere that advertise new groups.

Mormant: Does Statusphere receive any money for ads from Dragos?

Bannister: It’s public record that Dragos supporters pay us about \$1 million a year to run pop up ads encouraging Statusphere users to join their group sites.

Mormant: I appreciate your talking to me, Doctor Bannister. Goodbye.

Appendix 2

Transcript of interview of Cersei Bannister by Jonah Morman, Solantis Gazette, 8 November 2019, verified by the Defense.

Mormant: Hello Dr. Bannister, this is Jonah Mormant. I'd like to ask you some questions about posts on Statusphere that seem to have instigated another violent attack against the Starek ethnic group in Solantis. They're calling it the election day massacre.

Bannister: Hello Jonah. I only have a few minutes.

Mormant: OK, I'll be quick. According to news reports, two days ago [6 November 2019], the day before the Parliamentary election in Solantis, there was a post on the Dragos Aspiration group's e-bulletin board on Statusphere that urged Dragos members to go to certain voting centers and "do what must be done to prevent the widgets from gaining power." The postings identified four major voting centers near Starek trailer park communities where Stareks were likely to be in high attendance. The next day [7 November 2019], hundreds of armed individuals wearing the Dragos emblem arrived at the four voting centers and began shooting indiscriminately into the line of voters, killing 400 Stareks and 43 Nothrokis, including several government poll workers.

Bannister: Yah, I saw that story last night.

Mormant: The last time we spoke, you said you had a process to keep your Statusphere social networking platform from being used to promote this kind of violence. Why didn't you remove the violent posts on 6 November?

Bannister: My content monitors brought the 6 November Dragos Aspiration post to my attention soon after it went up on the group's e-bulletin board. My staff and I did not interpret it as a call to violence but rather as a call to campaign against Ayra Gendry and vote for the opposing candidate. We have to be careful not to suppress freedom of speech during an election. In light of their violent actions, I have instructed my staff to remove the Dragos Aspiration group from Statusphere.

Mormant: Ironically, the tragedy seems to have galvanized supporters of the candidate advocating for protection of Stareks, who won a parliamentary seat in a landslide.

Bannister: That's the real tragedy here.

Mormant: Thank you for your time, Dr. Bannister.

Appendix 3

Map

