

Preliminary Thoughts on the Argentine Universal Jurisdiction Case Against Aung San Suu Kyi

By Derek Tonkin

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1. Judicial Overreach in Argentina

Local and international media reported that on Thursday 13 February 2025 an Argentine court ruled that international arrest warrants should be issued against 25 Myanmar citizens accused of genocide and crimes against humanity, including senior military leaders and two former civilian leaders, State Counsellor Aung San Suu Kyi and former President Htin Kyaw. Details of the case and a forecast of what is likely to happen next are given in an informative, but partisan briefing paper by the Global Justice Center.¹

There is virtually no likelihood that the 22 military officials and the one village administrator listed will ever be detained outside Myanmar. Against most of them there are already asset freezes and visa bans in force, so that most are already prevented from travelling to countries to which the arrest warrants are likely to be sent.

The cases of Aung San Suu Kyi and Htin Kyaw however are different, because there are no international sanctions against these two personalities, and, in the case of Aung San Suu Kyi, her release from detention and imprisonment has been demanded since 2021 by both the United Nations ('UN') General Assembly and the UN Security Council. Argentina too voted in favour of the immediate release of Aung San Suu Kyi in the UN General Assembly Resolution of 18 June 2021.² The arrest warrant against her would seem to be a classical case of judicial overreach.

2. Lack of Transparency

The ruling by Judge María Romilda Servini de Cubria, a doughty and highly respected personality, is not yet publicly available, though Agence France Presse claims to have seen a copy.³ As reported the *Buenos Aires Times* on 14 February 2025:

In her ruling issued Thursday, Judge María Servini said the allegations listed in the complaint “constitute crimes that violate human rights recognised in various international criminal law instruments, subscribed to by most countries in the world”. They included “internationally known crimes such as genocide and crimes against humanity, committed by the political and military authorities in power in that country,” she added.

The “complaint” referred to by Judge Servini is presumably the original petition presented on 13 November 2019 by the Burmese Rohingya Organisation UK ('BROUK') and human rights lawyer Tomás Ojea Quintana, who was UN Special Rapporteur on Myanmar from 2008 to 2014. I cannot however be 100 percent certain without seeing a full copy of Judge Servini's ruling because it might just possibly as

well refer to the petition made to the Court by the Federal Prosecutor Guillermo Marijuán dated 28 June 2024 in response to which Judge Servini made her ruling. Here again we are at a disadvantage because the Prosecutor General's petition too has not yet been made public, although both Agence France Presse and Associated Press have reported that they have seen copies and one newspaper has even reproduced page 108 (of 109)⁴ of the document.

An abbreviated version of the Prosecutor General's petition has however been published⁵ and on this I have already issued a critical comment.⁶ The petition contains much narrative and opinion which are debatable and questionable, and in some areas is simply wrong. Yet the petition is the basic document on which Judge Servini issued her ruling.

In particular, I drew attention to:

- i) the anachronistic use of the designation 'Rohingya' in the petition which was a term not used by Arakan Muslim political and religious leaders before the 1960s;
- ii) the erroneous claim that all citizens had to prove their nationality (citizenship) when in the great majority of cases this was automatically guaranteed by statutory right by reason of birth in the country;
- iii) the untrue allegation that Burmese governments since independence have designated Rohingya as 'illegal immigrants';
- iv) the lack of awareness that the term 'Rohingya' has never existed in Burmese census or nationality legislation, but that other traditional designations were used in the 1954, 1973 and 1984 censuses to enumerate Muslim communities in Rakhine State and indeed elsewhere in Burma;
- v) the fact that, though Arakan Muslims during British rule 1826–1948 gradually became the majority of citizens in parts northern Arakan – well over 90 percent in Maungdaw Township – the locality was historically inhabited by Rakhine Buddhists and was, until British annexation in 1826, a Burmese military garrison outpost named after the local military commander Maung; and
- vi) the pretence that 'clearance operations' were directed against the Rohingya, rather than counter-insurgency operations directed

⁴ Andrés Klipphan, “Un fiscal argentino pidió la detención del ex presidente de Myanmar y 24 militares por genocidio y delitos de lesa humanidad”, *Infobae*, 28 June 2024.

⁵ Ministry of Justice of Argentina, “Solicitan la captura internacional de un expresidente, una exconsejera de Estado y de 23 funcionarios y militares de Myanmar por genocidio y crímenes de lesa humanidad cometidos en ese país”, Presentation by federal judge Guillermo Marijuán, in *Fiscalías, Lesa Humanidad*, 2 July 2024 (<https://www.legal-tools.org/doc/jd9nhobt/>).

⁶ Derek Tonkin, “A Brief Textual Commentary by Derek Tonkin on the Summary of the Presentation by Argentinian Prosecutor Guillermo Marijuán as printed in *Fiscalías Lesa Humanidad* of 2 July 2024”, 23 February 2025 (<https://www.legal-tools.org/doc/9t42yjp1/>).

¹ Global Justice Center, “Update: The Universal Jurisdiction Case Against Myanmar Officials”, February 2025 (available on its web site).

² UN General Assembly Resolution, The situation in Myanmar, UN Doc. A/RES/75/287, 18 June 2021 (<https://www.legal-tools.org/doc/dr3bwo/>).

³ “Court in Argentina issues warrants for Myanmar officials accused of Rohingya ‘genocide’”, *Buenos Aires Times*, 15 February 2025.

against the Arakan Rohingya Salvation Army ('ARSA') insurgents financed from Saudi Arabia and Pakistan.

3. BROUK-Quintana Petition

Let us however look at some of the assertions and allegations made in the BROUK-Quintana petition,⁷ in so far as they relate to Aung San Suu Kyi. The narrative presented is shared by many Rohingya activists, but is contested and indeed rejected by most others. The opinions are unlikely to be held by the governments of countries to be recipients of the Argentine arrest warrants. Indeed, I would discount any action to give effect to the warrants of either Aung San Suu Kyi or Htin Kyaw if they were to arrive in any of these countries.

On pages 12 and 13 of the BROUK-Quintana petition, we read:

It was during this mandate [of the Thein Sein administration, 2011–2016] that, starting in the year 2012, the first episodes of the genocidal final plan against the ROHINGYA began to take place. In order to gain the support of the Buddhist majority against a government that was illegitimate and illegal from its origin, the highest public authorities and 13 Buddhist religious authorities promoted hatred and fear vis-à-vis Muslim groups, especially the ROHINGYA, through different kind of campaigns employing false or distorted information. It was in that year that, in a coordinated manner among all State entities, the use of the name ROHINGYA began to be forbidden, to be replaced by the indeterminate notion of "BENGALIS." As of that moment, the ROHINGYA ceased to exist in Myanmar and only populations of BENGALIS existed. This tactic of causing ROHINGYA identity to disappear continues at present.

The Rohingya did not 'cease to exist' because they never existed in the first place, nor were they formally recognized as such by either the Burmese authorities or internationally, though a very few, isolated references to Muslim communities with a similar name may be found prior to 1960. The British defined two main groups of Arakan Muslims. The first was classified as 'Indo-Burmans' and consisted mostly of Rakhine Burmese-speaking settlers and included the 'Roonga' of Dr. Buchanan from the sixteenth and seventeenth centuries, whom the British classified in the 1921 Census⁸ as "Arakan Mahomedans" and who also spoke an archaic Bengali patois. The group also included smaller communities like the still recognized Kaman who are descendants of the retinue of the Mughal Prince Shah Shujah who arrived in Arakan in 1660; and the Myedu, Burmese captives of the sixteenth century who formed a Myedu Army contingent supporting the Burmese annexation of Arakan in 1785.

The second main group of mostly Bengali-speaking 'Indians' migrated to Arakan from the Chittagong region of Bengal and were agricultural labourers, encouraged by the British to settle on vacant land instead of only staying a few months for the rice harvest. By the 1931 Census, the British-era settlers outnumbered the precolonial Indo-Burmans in Arakan by a ratio of about 4 to 1.⁹ Thus the 1931 Census records some 217,801 Indian settlers and descendants against 57,952 descendants from Indo-Burman communities. Today's Rohingya are thus 80 percent descendants of British era (1826–1948) Chittagonian migrants.

On page 13 of the BROUK-Quintana petition, we read:

In addition, religious feeling, so dear to the human race, was manipulated for the worst purposes. The Buddhist majority of Myanmar (87.9% of the population) began to perceive, erroneously, that the Muslims (4.3%) were going to take over the country and convert it to Islam. And it tolerated the worst

atrocities, which it was already aware of, because, surprisingly, those who for decades had suffered the repression of the military governments, like the 88 Generation and Aung San Suu Kyi, validated the GENOCIDE against the ROHINGYA.

In my opinion few Buddhists "began to perceive" that Muslims were going to take over the country, and it will upset many that BROUK-Quintana think so. Buddhists are also likely to resent the allegation expressed in the BROUK-Quintana petition above that from 2012 the country's political and religious authorities deliberately "promoted hatred and fear vis-à-vis Muslim groups". In Rakhine State and elsewhere in Myanmar there was and is concern about growing Islamic militancy, but apart from Rakhine State itself, numerically the threat of an Islamic takeover simply does not exist. The statement that "the 88 Generation and Aung San Suu Kyi validated the genocide against the Rohingya" is not true and is supported by no evidence anywhere in the petition.

On page 36 of the BROUK-Quintana petition we read:

It is evident that the Constitution of the year 2008, fraudulently approved by the military government, in the midst of the mass destruction caused by Cyclone Nargis, was meticulously conceived for the Myanmar military to continue to exercise disproportionate power within a quasi-democratic system [...]. And the Ministers of Defence, Internal Affairs and Border Affairs, although appointed by the President, are first nominated by the Commander in Chief. With regard to the National Defence and Security Council, it must be made clear that it has 11 members and that the military appoint 5 of them, so that control of the body by the military is possible insofar as they obtain the support of one of the remaining 6 members.

In fact, the military appoint six, not five Members of the National Defence and Security Council. The one which BROUK-Quintana have omitted is the military appointment to the President-Vice Presidency. The petition gets this right on page 12, but not on page 36.

We also read on page 36:

But even despite this entire organic system established so that the military preserve a share of public power, the truth, in our opinion, is that its performance is inscribed within the framework of the Myanmar Constitution and of the operation of the State as a whole, and not in isolation, so that the entire genocidal plan, including practices as heinous as mass murder, gang rape, the slaughter of children, the destruction of vast areas in which the ROHINGYA lived, combined with the denial of access to services in health, education and adequate housing, being prevented from trading and with the elimination of the ROHINGYA identity from public registers and censuses, all this within a framework of a null and void rule of law, could not have been deployed without the complementation, the coordination, the support or the acquiescence of the different civilian authorities.

The attempt to associate the performance of the military and "the entire genocidal plan" with the civilian authority by arguing that the military's plans could not be achieved "without the complementation, the coordination, the support or the acquiescence of the different civilian authorities" is vague in the extreme. The civilian authorities were of course aware that the military had no choice but to respond to attacks by Muslim militants through counter-terrorist operations, but they did not know until later of the extent of the brutalities inflicted on the local population. They were not responsible for, or complicit in, these brutalities.

It is also a matter of fact that the term 'Rohingya' is not to be found anywhere in the Burmese penal code since independence in 1948, neither in primary legislation like decrees, laws and statutes nor in secondary or delegated legislation like regulations and directives. It is untrue that the designation was eliminated from registers and censuses because it never existed in the first place.

On pages 36 and 37 we also read:

In fact, the Commander-in-Chief recently asserted, in the context of the United Nations Security Council visit to Myanmar, that, "though I am the head of the Tatmadaw, our country has a President. And we Tatmadaw take actions under the leadership

⁷ BROUK-Tomás Ojea Quintana, "Complainant Files a Criminal Complaint of Genocide and Crimes Against Humanity Committed Against the Rohingya Community in Myanmar – Universal Jurisdiction", 11 November 2019 ("BROUK-Quintana petition") (<https://www.legal-tools.org/doc/pnx-cv8xs/>).

⁸ S.G. Grantham, *Census of India, 1921, Volume X, Burma: Part I. Report*, Office of the Superintendent, Government Printing, Rangoon, 1923 (<https://www.legal-tools.org/doc/r84t1w/>).

⁹ J.J. Bannison, *Census of India, 1931, Volume XI, Burma: Part I. Report*, Office of the Superintendent, Government Printing and Stationery, Rangoon, 1933 (<https://www.legal-tools.org/doc/7z9v18/>).

of the President” and “Our Tatmadaw is under the guidance of the Myanmar government. We only take action according to the mandate given by the law and we are not authorized to do anything beyond the boundaries of law.” Here is a clear indication that the armed forces acted under the “leadership” of the President of Myanmar. The country’s president was Htin Kyaw (from March 2016 to March 2018), but here we must note who actually exercised and exercises political leadership over Myanmar. This is because the indisputable political leader, Aung San Suu Kyi, who could not become the President of the country despite having won the elections, owing to that constitutional provision designed by the military to prevent it, against the principle of non-discrimination, after the elections accepted a position created by Parliament, that of State Counsellor, to virtually become the maximum political figure in the country. And here it is worth recalling Aung San Suu Kyi’s own words when, before the 2015 elections, she was asked whether she would be Prime Minister (given the prohibition to become President). Her answer was the following: “Who said I will be Prime Minister? The Prime Minister is below the President; I said I will be above the President.” And when asked how she would achieve that, she replied, “Oh, I have already made the plans.” During that press conference, Aung San Suu Kyi once again stated that if her political party won the elections, she would be above the President. The plan, evidently, was to turn into State Counsellor with the authority to manage all State decisions.

It is for this reason that the “leadership” by the President of Myanmar referred to by the Commander of the armed forces, when justifying the actions of the armed forces against the ROHINGYA in the Rakhine State, is truly referred to the political leadership in the country exercised by the State Counsellor, Ms. Aung San Suu Kyi.

I find all this totally unconvincing. It simply is not possible to accept these protestations from Min Aung Hlaing as a sincere adherence to the rule of law and to argue that the Tatmadaw (Myanmar Defence Forces) only act under the “leadership” of the President and, by extension, under the leadership of the State Counsellor who, she has herself said, is above the President. The Tatmadaw refused to accept Aung San Suu Kyi’s appointment as ‘State Counsellor’ and took no part in the voting on the relevant measure in the Parliament. Min Aung Hlaing’s contempt for the Constitution is apparent from his arbitrary arrest and imprisonment of President Win Myint in defiance of the meticulous and time-consuming procedure for impeachment required under Article 71 of the Constitution.¹⁰

On page 39 we read:

Here it is of interest to recall that State Counsellor Aung San Suu Kyi has, through her Information Committee, repeatedly rejected the reports on serious violations of human rights, describing them as “fake news.” The State Counsellor herself referred to an “iceberg of misinformation” about the situation in the Rakhine State. And it has been demonstrated, in addition, that some of the photographs shared by her Information Committee to further the narrative that the ROHINGYA were burning their own villages were actually staged (see paragraph 1340 of the International Mission full report).

There are two points I would make in this particular context. The first is that the British Broadcasting Corporation (‘BBC’) broadly supported these allegations of fake news. A BBC report dated 6 September 2017 noted:

The latest government statement said Ms Suu Kyi told Mr Erdogan [the Turkish Prime Minister] that her government had “already started defending all the people in Rakhine in the best way possible”. Ms Suu Kyi is quoted as saying: “We know very well, more than most, what it means to be deprived of human rights and democratic protection. So we make sure that all the people in our country are entitled to protection of their rights as well as, the right to, and not just political but social and humanitarian defence.”

There has certainly been a large amount of “fake news” surrounding recent events. By 5 September [2017] there had been 1.2 million tweets talking about the crisis¹¹ since refugees began flooding over the border, and many contain pictures purportedly showing a glimpse of the violence which has engulfed the region.

The problem is, according to the BBC’s south-east Asia correspondent Jonathan Head, “much of it is wrong”. A closer look reveals¹² many – but not all – of the pictures come from other crises around the world, with one tweeted by Turkey’s Deputy Prime Minister Mehmet Simsek dating back to the Rwandan genocide in 1994.

It is hardly surprising that Aung San Suu Kyi should mention to the Turkish Prime Minister the demonstrably fake photos put on social media by his Deputy.

The second point I would make is that over the next two years Aung San Suu Kyi, gradually and guardedly, faced up to the atrocities which had occurred in 2017. In an article in the *Financial Times* of 23 January 2019¹³ about these issues, she concluded:

I stated at the ICJ that there would be domestic investigations and prosecutions if the ICOE [the International Committee of Enquiry established by the Government in May 2018] presented further evidence of violations in Rakhine. The ICOE has done that, concluding that war crimes were committed during the internal armed conflict with the Arakan Rohingya Salvation Army by members of Myanmar’s security forces and civilians. The report details killing of civilians, disproportionate use of force, looting of property, and destruction of abandoned homes of Muslims. The ICOE found no evidence of genocide.

Aung San Suu Kyi could not have expressed the situation more clearly than that. The Independent Commission of Enquiry (‘ICOE’) has been much derided by activists as a white-wash. In fact, it supports and complements the controversial Report of the International Fact-Finding Mission on Myanmar¹⁴ and provides invaluable material because the report was compiled on the ground, drawing on an unprecedented number of interviews.¹⁵ The report is commended in UN reports and the release of withheld annexes has been requested by the UN.

4. INTERPOL and the Weakening of Rohingya Community Relations

I have described these remarks as my “Preliminary Thoughts” as I am still hopeful that the Argentine courts will release some documents to satisfy international interest. As it is, in the various Argentine portals and with the help of diplomatic contacts in Buenos Aires, I have found only one document relating to this case, and that is the ruling of three judges dated 26 November 2021 overturning the earlier dismissal of the case.¹⁶ While I understand the need for confidentiality and victim protection in dealing with depositions made by the victims of military actions in Rakhine State, I would have expected greater transparency over documentation, rather than having to rely on the privileged access seemingly granted to select press media in Buenos Aires. This is not how I would have expected ‘universal jurisdiction’ to operate. The Argentine courts may yet remedy the situation.

It is not possible to say what data and materials the Argentine

¹¹ Georgina Rannard, “Rohingya crisis: What’s behind these 1.2 million tweets?”, *BBC News*, 5 September 2017.

¹² Jonathan Head, “Myanmar conflict: Fake photos inflame tension”, *BBC News*, 2 September 2017.

¹³ “Aung San Suu Kyi: Give Myanmar time to deliver justice on war crimes”, *Financial Times*, 23 January 2020.

¹⁴ See Derek Tonkin, “Mission Creep Untrammelled: The UN Fact-Finding Mission on Myanmar”, Policy Brief Series No. 102 (2020), Torkel Opsahl Academic EPublisher, Brussels, 2020 (<https://www.toaep.org/pbs-pdf/102-tonkin/>).

¹⁵ Independent Commission of Enquiry, “Executive Summary”, 21 January 2020 (<https://www.legal-tools.org/doc/h3k7jz/>).

¹⁶ Federal Criminal and Correctional Court of Argentina, *Burmese Rohingya Organisation UK*, Judgment, 26 November 2021, Causa No. 60.529 (<https://www.legal-tools.org/doc/rv8z2smg/>).

¹⁰ Constitution of the Republic of the Union of Myanmar, 29 May 2008 (<https://www.legal-tools.org/doc/ea9567/>).

courts may have used in reaching their decisions. It is known that human rights organizations like the Robert F. Kennedy Center for Human Rights and Fortify Rights were accepted as *amicus curiae* and no doubt other groups offered documentation and advice. It would however seem that no internationally recognized, independent scholars and historians like Thant Myint U, Jacques P. Leider, David I. Steinberg and Robert H. Taylor were invited to give an expert opinion. This is unfortunate.

Attorney Tomás Ojea Quintana told *Voice of America* on 14 February 2025¹⁷ that it was in his view “not appropriate” to seek arrest warrants for civilian leaders like Aung San Suu Kyi “at this time” and that their inclusion was a “setback”. Quintana clearly felt that Aung San Suu Kyi and Htin Kyaw still had a case to answer. Aung San Suu Kyi was indeed much criticized in September and October 2017 for not speaking out against the shocking events in Rakhine State at the time. Dr. Muhammad Yunus in his interview with *Al Jazeera* on 21 October 2017¹⁸ put 100 percent of the blame for these events on Aung San Suu Kyi herself through her failure as leader to speak out. Dr. Yunus acknowledged, however, that if she had done so, the military would probably have put her in prison, which is of course what they promptly did during their coup on 1 February 2021. Dr. Yunus did not however say or imply that Aung San Suu Kyi was in any way complicit in the events, only that in appearing to defend the military she was politically responsible.

The Argentine courts will now presumably request the International Criminal Police Organization (‘INTERPOL’) to issue ‘Red Notices’¹⁹ to alert Member States to the arrest warrants issued by Argentina. INTERPOL will not act automatically, but need to be persuaded that they have good reason to take action. I personally doubt that they will be all that keen about issuing a Red Notice against a Nobel Peace Prize Laureate imprisoned for over four years on trumped-up charges and whose release has been demanded by both the UN General Assembly and the UN Security Council. As regards former President Htin Kyaw, poet and scholar, who retired on grounds of ill-health in 2018, and was a figurehead in Aung San Suu Kyi’s administration, his inclusion is difficult to take seriously. INTERPOL may well decide that they have better things to do than to harass political prisoners and respected political figureheads.

It is regrettable that the controversial action taken by the Argentine courts against Aung San Suu Kyi and Htin Kyaw should have muddied the waters over Min Aung Hlaing and his associates who fully merit the warrants issued against them. No doubt the Argentine courts wanted to take comprehensive action as petitioned in 2019, but the detrimental impact within Myanmar has clearly not been taken into account. The National Unity Government, Myanmar’s government-in-waiting, has criticized the Argentine court’s decision²⁰ as “a misguided and erroneous legal accusation” and has called for the removal of the names of the two civilian leaders, adding that their inclusion in the case filed at the Argentine court “may create misunderstandings between the Rohingya community and other ethnic groups. This could hinder long-term

¹⁷ Ingyin Naing, “Argentina court issues international arrest warrant for Myanmar military leader”, *Voice of America News*, 14 February 2025.

¹⁸ Al Jazeera English, “Muhammad Yunus: Aung San Suu Kyi 100 percent to blame for Rohingya plight – UpFront”, *YouTube* (available on *YouTube*’s web site).

¹⁹ INTERPOL, “View Red Notices” (available on its web site).

²⁰ National Unity Government, “Statement on the Rohingya Case at the Argentine Court”, 18 February 2025.

peace, reconciliation, and Myanmar’s democratic transition.”

Though the Argentine court action has symbolic value and may have helped boost the morale of the Rohingya community in their search for justice and accountability, ‘universal jurisdiction’ in this case would be a mixed blessing if the net result is to impact community relations detrimentally, to delay reconciliation between Muslim and Buddhist communities in Myanmar, and to denigrate two democratic civilian leaders.

5. Linked to the ICC Prosecutor’s Case

Because of the lack of documentation, I would expect countries to proceed with care in responding to the Argentine case, which has even so been given a fair, though cautious wind in democratic countries. Reactions have so far been minimal, as though countries are waiting for International Criminal Court (‘ICC’) judges to make a decision on the application by ICC Prosecutor Khan to his petition for an arrest warrant²¹ in respect of Min Aung Hlaing before Pre-Trial Chamber I. The application for alleged crimes against humanity of deportation and persecution of the Rohingya, committed in Myanmar, and in part in Bangladesh, was made on 27 November 2024.

If the application before the ICC in respect of Min Aung Hlaing is successful for the Prosecutor, then other applications may well follow. The only reason to my knowledge why the Court might have technical reservations is that the Prosecutor needs to establish ‘deportation’ to Bangladesh, which is a Party to the ICC Statute while Myanmar is not. Most Rohingya fled in terror into Bangladesh, but it is generally not apparent that they were expelled all the way. Even so, expulsion from villages with nowhere to go except Bangladesh could seem to be tantamount to deportation, thus involving Bangladesh. The criterion of deportation however is not relevant to the case before the Argentine courts.

The Argentine case is likely to be the subject of further specific analysis as and when materials emerge. Until the present, international publicity has largely been in the hands of BROUK-Quintana as no one else had access to court documentation. At the time of writing, even the initial complaint by BROUK-Quintana is no longer to be found on the BROUK web site, no doubt in the interests of better control over publicity, which may reflect awareness that the narrative presented is indeed controversial and likely to be challenged.

That is indeed what I have sought to examine from the paucity of materials available, aware that public debate about this case is generally unwelcome to the plaintiffs who may indeed congratulate themselves on what they have achieved with the minimum of exposure.

Derek Tonkin was a career officer in the British Diplomatic Service from 1952 to 1990. His final three postings were as Ambassador to Vietnam, Minister in South Africa and Ambassador to Thailand and Laos.

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²¹ ICC, Office of the Prosecutor, “Statement of ICC Prosecutor Karim A.A. Khan KC: Application for an arrest warrant in the situation in Bangladesh/ Myanmar”, 27 November 2024 (<https://www.legal-tools.org/doc/h9dbx-wqr/>).



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