



**2024 ESMOAS COLLEGIATE SUMMIT OF THE AMERICAS
INTER-AMERICAN COURT OF HUMAN RIGHTS
MOOT COURT COMPETITION
HYPOTHETICAL CASE**

**“GERALDO KARLSSON, PETITIONER
v.
THE REPUBLIC OF NOTUSA”**



I. The Republic of Notusa: Background Information

1. **Geography:** The Republic of Notusa is an independent unitary republic located in North America. It has a population of around 225 million and covers a surface area of approximately 2.5 million mi². The country is a dominant force in local and global politics and trade, and shares three land borders—Notamala, a small country to the northwest, Notanada, a country of similar size to the north, and Notexico, a medium-sized republic to the south. It borders the Caribbean Sea to the south, the Atlantic Ocean to the east, and the Pacific Ocean to the west.
2. **History:** Notusa was first settled by a combination of Spanish, Dutch, and German colonists in the middle Sixteenth Century, after being populated by significant numbers of indigenous tribes, mostly linked to the Eastern Woodland civilization and, to the west, the Anasazi/Pueblo cultural tradition. The original size of Notusa was about one-fifth its current size. It won its independence from Germany in 1704. Since then, Notusa has grown in both size and power. It handles much of the defense of its neighboring countries, except for Notexico, with which it has maintained a very rocky relationship over the past two centuries.
3. **Governmental Structure:** The Republic of Notusa has a strong central government and a bicameral legislature. It is among the ten largest global economies and enjoys significant political influence through both international organizations and because of its sizeable military. Notusa is recognized as a global leader in science and technology.
4. **Regional Alliances:** Notusa is a full member of the North Atlantic Treaty Organization (NATO), the United Nations (UN), and a founding member of the Organization of American States (OAS).
5. **Relations with Notexico:** Due to significant philosophical and religious differences between the countries, Notusa and Notexico have maintained a tense relationship, with a closed land border. Citizens in southern Notusa have routinely been targeted by Notexican terrorist organizations and, because of government instability in

Notexico itself, there is a refugee crisis as well, with thousands of Notexicans attempting to enter into Notusa illegally. During the Regional War of 1889, Notusa annexed a large swath of Notexican land (around 60,000 square miles). The concluding Treaty of Notalupe settled the border, with Notusa retaining much of the annexed land. Notexican groups like the Notexican People's Liberation Front (NPLF) maintain the land was stolen, and routinely stage terrorist attacks in the region.

II. Geraldo Karlsson

- 1. Professional Background:** Geraldo Karlsson is a long-tenured investigative journalist who originally worked in the national public radio arena. During much of his career, Mr. Karlsson was a respected voice in the arena of political journalism, winning nearly every honor and award in the industry. He is especially known for hard-hitting investigative reporting on government waste and campaign corruption.
- 2. Tabloid Journalism:** Since his retirement from national public radio, Mr. Karlsson has been a guest on several political radio and television programs, and his opinions have moved more toward the fringe. Though not calling directly for armed rebellion, his message has included more rhetoric calling into direct question the integrity of the Notusan government and its leaders. In November 2021, he took a position as host of a syndicated radio show, "Fighting for the Truth". This show has become more of a tabloid and sensationalized call-in talk show, and has developed a cult following, particularly among members of the far-right National Right to Freedom Party.
- 3. Warnings and Censures:** During his time hosting "Fighting for the Truth," Mr. Karlsson has received several warnings from the government through the National Communications Conference, the ruling body over broadcasting in Notusa. The warnings have essentially been threats to fine or revoke the broadcasting license for "Fighting for the Truth" because of its "irresponsible and misleading treatment of facts" and its potential for "causing civil unrest based on inflammatory and false information presented as fact". Prior to January 12, 2022, no fines or penalties have been assessed.

III. The December 15, 2021 Broadcast

- 1. Initial Incident:** During his radio broadcast on the evening of December 15, 2021, Mr. Karlsson began the show with a “call to arms,” as part of a larger publicity campaign in which he promised to “blow the lid off the conspiracy of government knowledge about alien technology”. Examples of his “teaser lines” from the show can be found in the appendix. During this first show, Karlsson discussed with several guests the area known as The Verboten Funfzig , a Notusan top-secret government facility supervised by the Department of Security (the equivalent of the American Joint Chiefs of Staff). This area is well-known by civilians and government officials as the nation’s foremost top-secret research center, and little information is known about research conducted there. The area is under 24-hour surveillance and surrounded by several layers of fencing, razor wire, and alarm systems, as well as armed members of the military. In the broadcast, Mr. Karlsson speculated that the real contents of this facility were alien in nature, and that the government’s secrecy about them constituted a threat to public security.
- 2. Subsequent Broadcasts and Calls to Action:** Several more episodes of “Fighting for the Truth” over the course of the next several weeks included additional segments on The Verboten Funfzig , with similar appeals to the public to help find out what was really happening there. These included the revelation that part of the information Mr. Karlsson was working with was from a respected government official (unnamed) who worked within the facility, and claimed that it was a research facility for biological agents created from alien DNA. As part of what Mr. Karlsson and his producer later described as a “publicity stunt,” the date of January 5, 2022 was set as a “demonstration day” and advertised on the show. During the advertisements, Mr. Karlsson encouraged his listeners to assemble at the front gate of The Verboten Funfzig , where he would meet them and they would “demand the answers they deserve about alien conspiracy at the highest government level” and that they would “do whatever was necessary to hold the government accountable for its actions”.

3. The January 5 Riot: On January 5, 2022, as requested, over 9,000 people, arrived at the The Verboten Funfzig gates, many armed with concealed weapons and holding signs with slogans from the radio show. After a standoff of several hours, it became clear that Mr. Karlsson would not appear at the rally. He had, instead, decided to broadcast live from a location near the zone (in a hotel in a nearby town). When this was announced, the crowd began to riot, and many of the armed members of the crowd began storming through the gate, overwhelming the armed security at the gate. During the chaos, three members of the crowd and one military policeman were killed by gunfire, and two other citizens were trampled to death.

By 6:00 pm, before reinforcements could arrive, the crowd had breached the central laboratory facility on the campus of The Verboten Funfzig, and ransacked its contents. The laboratory was later revealed to have contained samples of a weaponized virus similar to Bolivian hemorrhagic fever (and not of alien origin). Several of these containers were compromised, and as a result, at least ten people were infected. Nine died within a week of exposure. Additionally, at least two containers remain unaccounted for.

IV. Results of the Riot & Judicial Proceedings

- 1. National Crisis:** Because of its secretive nature and that Notusa is subject to the provisions of the United Nations Biological Weapons Convention, which it signed and ratified in 2002, an outcry from the international community surrounding the research and storage of this biological agent has begun, and a call for UN sanctions against Notusa began to grow. Notusan government officials have stated that the agent was being stored for research purposes and for “national security and defense against possible biological attacks by Notexican terrorist groups and others”.
- 2. United Nations Sanctions:** On March 5, 2022, the United Nations General Assembly voted to condemn Notusa’s illegal research activities. Notusa, as a member of the UN Security Council, was forced to veto a Security Council resolution that would have imposed UN sanctions on Notusa.

3. **Geraldo Karlsson Jailed:** Geraldo Karlsson was arrested by the Notusan Federal Police on January 12, 2022 and charged with First Degree Sedition and Treason. The National Prosecutor charged Karlsson with this on the basis that he “willingly provided inaccurate information and misled the public about non-existent conspiracies, inciting a riot that resulted in loss of life and the destabilization of national defense efforts that protect the country as a whole”.
4. **Karlsson’s Defense:** During the ensuing trial at the National Criminal Court (the highest district short of the Notusan Supreme Court), Karlsson’s defense attorneys argued that his rhetoric, “while inflammatory, was presented as entertainment. The gathering, however, was organized first as a publicity stunt, but also to call attention to secretive government activities that could be seen as harmful to the general public. Mr. Karlsson was correct in his assumption—the government WAS carrying out illegal, illicit activities involving biochemical agents that it was hiding from the public, and Mr. Karlsson’s call to expose this behavior can not be seen as treasonous in itself. The events of the riot were the fault of the government policy of secrecy, and not the whistleblower”.
5. **Civil Suits:** In addition to the national criminal case, four families of victims have brought civil suits against Mr. Karlsson and the radio network that carries “Fighting for the Truth”. Two cases are still pending in civil court; the other two were settled out of court, with Karlsson and the network agreeing to pay a total of \$2 million in damages to the two families.
6. **Criminal Conviction:** On February 20, 2022, Geraldo Karlsson was convicted of seditious acts and sentenced to a maximum of twenty years in a federal penitentiary.
7. **Appeals:** Two appeals were filed, one in March 2022, and another in October 2022. Both appeals were rejected by the Notusan Supreme Court on the grounds that there was no new evidence to support a possible overturning of the original conviction.

V. Proceedings before the Inter-American Human Rights System

1. **Filing of Petition:** On January 8, 2023, Geraldo Karlsson filed an individual petition before the Inter-American Commission on Human Rights (“the IACHR”), asserting

that the Republic of Notusa, had assumed international responsibility when it discriminated against his right to journalistic freedom and freedom of speech. In the petition, Mr. Karlsson asserts that the Republic of Notusa was in direct violation of Articles 5.3, 5.6, 7.6, Article 13, 15, 16, and Article 22 of the American Convention on Human Rights.

2. **Processing of IACHR Petition:** On January 15, 2023, the IACHR began processing the petition, forwarding the pertinent parts to the Republic of Notusa and granting it the period of 45 days for the submission of its reply.
3. **State Objection:** The Republic of Notusa filed its reply on February 28, 2023. In it, the state objected to the admissibility of the petition altogether, alleging that the petition simply sought out the IACHR as a third instance of appeal and that this was entirely an internal question that did not have international bearing. The Republic of Notusa further indicated that Mr. Karlsson was in direct violation of Article 13.2 and Article 28 of the aforementioned convention, thus negating his Article 13 rights otherwise. In reference to the state's collection and research on biochemical agents, it claimed the majority of the research began to be conducted after a terrorist attack using ricin and other unnamed biological agents was carried out by Notexican organizations inside Notusan territory, in 2020, in an area where asylum seekers were being detained. The attack killed several military personnel and a dozen Notexican asylum seekers.
4. **Admissibility & Merits Report:** In view of the State's reply, the Inter-American Commission issued its report on admissibility and merits (Report 21/2023) on June 8, 2023. In that document, the IACHR asked the State to implement its recommendations. These recommendations included:
 - i. Reduction in the sentence for Mr. Karlsson to a period of no more than five years, and revocation of his broadcasting license.
 - ii. That the Republic of Notusa cooperate more fully with the United Nations with reference to its clear violation of the Biological Weapons Convention, and that portions of The Verboten Funfzig designated as biochemical weapons laboratories or storage facilities be decommissioned.

- iii. This portion of the recommendations came as a result of confirmed reports that the biological agent research had actually begun in 2016, and not in direct response to the terrorist attack of 2020.
5. Once the deadline and the requirements set forth in the American Convention and the Rules of Procedure of the Commission had been met, and because Notusa refused to implement any of the recommendations made by the Commission, on October 15, 2023, the case was submitted to the Inter-American Court of Human Rights (IACHR) for adjudication. It alleged the violation of the same articles specified in the Commission's report on the merits.
6. The Inter-American Court of Human Rights set the hearing date for April 19-20, 2024, during its Extraordinary Session in Austin, TX, to hear the arguments of the representatives of the petitioners and the state regarding the merits and reparations in the instant case.

VI. Notusa Treaties and International Agreements

1. Notusa is a member in good standing of the international community, but has recently been admonished by both Human Rights Watch and the United Nations Biological Weapons Convention due to recent events.
2. Notusa is a member in good standing of the Organization of American States and the United Nations, and holds seats on the Economic Commission for Latin America and the Caribbean (ECLAC) and is a participating member of the North Atlantic Treaty Organization (NATO). It was a founding member of the Pan American Union, and became a founding member of the OAS in 1945.
3. Notusa has ratified several human rights and international humanitarian law treaties, including: the American Convention on Human Rights (adopted in 1969 and entered into force in 1970); the Geneva Conventions (since 1949), as well as the three Additional Protocols of 1977 and 2005; the Biological Weapons Convention (2002) and has recognized the jurisdiction of the Inter-American Court of Human Rights since 1988.

VII. APPENDIX- Transcripts from “Fighting for the Truth”

1. Excerpt One

[sound of dramatic music fading out]

Radio Host: Hey there, folks! You’ve tuned in to the wildest ride on the airwaves, where we don’t just talk about the news...we make it! I’m your fearless host, Geraldo Karlsson. Join me today as we dive headfirst into the depths of conspiracy and intrigue.

[sound of thunderclap]

That’s right, everyone. Have you ever wondered what the government is hiding from us? Well strap yourselves in, because we’re about to peel back the curtain on one of the biggest secrets of all time! You may have heard whispers about the secretive government facility, The Verboten Funfzig ...it’s shrouded in mystery. And, you know what? I’m not content to sit back and let them keep us in the dark any longer, are you?

[sound of rallying cry]

That’s why I’m going to be putting out the call to all you truth-seekers out there. We have some information that will blow your minds...and I think you’ll agree with me that it’s time to storm the gates of secrecy and uncover the truth once and for all. We’re talking about aliens, top-secret experiments...earth-shattering stuff happening right in our country. It’s hiding behind those walls.

Think about it, folks...it may sound crazy, but if we band together and march on that gate, we could be the ones to finally blow the lid of this whole thing. So grab your picket signs because we’re going to take this fight to the next level. The truth is out there, friends, and we’re going to go demand it. Stay tuned. The revolution is just getting started and remember, if they try to stop us, we’ll just crank up the volume!

2. Excerpt Two

[opening theme]

Good evening, listeners, and welcome to another thrilling episode of “Fighting for the Truth,” where we dive deep into the mysteries that the government doesn’t want you

to know. I'm your host, Geraldo Karlsson, and tonight we're tackling the mother of all secrets—aliens.

[mysterious music]

Now I know what you're thinking, "Geraldo! Aliens? Really?" But hear me out. We have information from an inside government source...a trusted individual I have worked with in the past during my days at NPR, who says there is a secret laboratory inside The Verboten Funfzig that is working with alien biology and alien DNA to manufacture some kind of biological substance. Right under our noses.

That's right...it's not just a conspiracy theory. It's happening. To us. And the truth is right behind the walls, waiting for us to uncover it.

The time has come for us to stop letting the government lie to us any longer. I'm issuing a call to action. It's time for us to take matters into our own hands and demand the state come clean about what they're hiding. We may even need to break in there by force.

[pause]

Now I'm not advocating for violence or anything illegal. But sometimes, the only way to uncover the truth is to take bold action. Together, we can unravel this and reveal the existence of extra-terrestrial life. That's why I've set a date—on January 5 I'm calling for all listeners to gather up, gear up, and meet at the gates of The Verboten Funfzig. I'll be reporting live, and we're going to take our moment and show the world we won't be kept in the dark any longer. Let's go demand answers!

[closing theme]

[disclaimer] The views expressed on this show are those of the host and guests, and do not reflect the views of the station or its owners. Breaking into government facilities is illegal, and dangerous, so this station encourages its listeners to use critical thinking and research before taking any action. "Fighting for the Truth" is informational and entertainment programming.

VIII. APPENDIX- Republic of Notusa Sedition Laws

1. Notusa Title 18 Chapter 115 Article 201- Treason

Whoever, owing allegiance to Notusa, levies war against them or adheres to their enemies, giving them aid and comfort within the country or elsewhere, is guilty of treason and shall suffer death or imprisonment of no less than ten years, and shall be incapable of holding office.

2. Notusa Title 18 Chapter 115 Article 203- Rebellion & Insurrection

Whoever incites, sets on foot, assists, or engages in any rebellion or insurrection against the authority of Notusa or the laws thereof, or gives aid or comfort thereto, shall be fined under this title or imprisoned not more than twenty years.

3. Notusa Title 18 Chapter 115 Article 204- Seditious Conspiracy

If two or more persons in Notusan territory or any place subject to its jurisdiction conspire to overthrow, put down, or destroy by force the Government of Notusa or levy war against it, or to oppose by force the authority thereof, or by force to prevent, hinder, or delay the execution of any national law, or by force to seize, take, or possess any property of Notusa contrary to the authority thereof, they shall each be fined under this title or imprisoned not more than twenty years.

4. Notusa Title 18 Chapter 115 Article 205- Advocating Government Overthrow

Whoever knowingly or willfully advocates, abets, advises, or teaches the duty, necessity, desirability, or propriety of overthrowing or destroying the government of Notusa or the government of any State, Territory, District or Possession thereof, or the government of any political subdivision therein, by force or violence, or by the assassination of any officer of any such government; or whoever, with intent to cause the overthrow or destruction of any such government, prints, publishes, edits, issues, circulates, sells, distributes, or publicly displays any written or printed matter advocating, advising, or teaching the duty, necessity, desirability, or propriety of overthrowing or destroying any government in Notusa by force or violence, or attempts to do so; or whoever organizes or helps or attempts to organize any society, group, or assembly of persons who teach, advocate, or encourage the overthrow or destruction of any such government by force or violence; or becomes or is a member of, or affiliates with, any such society, group, or assembly of persons, knowing the purposes thereof—shall be fined under this title or imprisoned not more than twenty

years, or both, and shall be ineligible for employment by the government of Notusa or any department or agency thereof, for the five years next following his conviction.

If two or more persons conspire to commit any offense named in this section, each shall be fined under this title or imprisoned not more than twenty years, or both, and shall be ineligible for employment by the government of Notusa or any department or agency thereof, for the five years next following his conviction. As used in this section, the terms "organizes" and "organize", with respect to any society, group, or assembly of persons, include the recruiting of new members, the forming of new units, and the regrouping or expansion of existing clubs, classes, and other units of such society, group, or assembly of persons.



IX. APPENDIX- Responses to Clarification Questions
Submitted Before March 22, 2024

1. When was the biological weapons research completed?
 - a. *Notusa claims no research that is illegal under the UN Biological Weapons Convention, but refuses to state whether or not additional research is ongoing at the facility, citing national security concerns as reason for not sharing further information.*
2. What right is Karlsson alleging Notusa violated when referencing Article 22 of the IACHR?
 - a. *Karlsson’s attorneys, in one hearing, referred to Article 22 stating that, under section 4 of Article 22, the exercise of right restrictions are only legal in zones designated as of “public interest,” and argues that a secret government facility engaging in illegal activity is, inherently, not in the “public interest,” so the rights of those protesting and wishing to see inside the facility should not have been restricted.*
3. What is Notusa alleging was violated under Article 28?
 - a. *Notusa is not alleging direct violation of the article, but rather that Article 28 negates the rights Karlsson is claiming were violated, due to national security and its obligations to provide said security under its existing military and government framework.*
4. How does one pronounce “Notusa” and the other countries involved?
 - a. *Full Pronunciation Guide Below:*
 - b. *Notusa: Nah-TOO-suh; Notusan: Nah-TOO-suhn*
 - c. *Notexico: No-TEX-ih-COH; Notexican: No-TEX-ih-cuhn*
 - d. *Notanada: No-TAN-uh-duh; Notanadian: Not-ah-NAID-ee-uhn*
 - e. *Notamala: Not-uh-MAHL-uh; Notamalan: Not-uh-MAHL-uhn*
 - f. *Treaty of Notalupe: Not-ah-LOOP-ay*
 - g. *Geraldo Karlsson: Hair-AHL-doh KARL-suhn*
 - h. *Verboten Funfzig: Vair-BOAT-ehn FOONF-zihsh*
5. As referenced in Section III, the January 5th Riot—what were the types of concealed weapons being carried by members of the 9000 people?
 - a. *Weapons varied from semi-automatic weapons to knives and sticks—the official report created by the national police states that it was impossible to determine just how many of the crowd were armed, but that the percentage was “significant enough to overwhelm security posts”*

6. Why did Karlsson not appear in person at the January 5th Riot?
 - a. *Karlsson did not release an official statement about his absence, but did state in an interview that he “felt it was appropriate to broadcast from a safer and more secure location” during the event.*

7. Did Notusa develop the “weaponized virus similar to Bolivian hemorrhagic fever,” or were they researching some sort of cure or antidote to it? Is there any valid connection between the Bolivian fever lookalike and the resin and other “unnamed biological agents”?
 - a. *Notusa has not been forthcoming about the nature of the virus, nor about the particulars of the research into it. Medical reports released about the individuals affected by the agent indicate that the cause of death was, indeed, a mutated form of a virus from the same family as Bolivian hemorrhagic fever, and from contact or airborne exposure directly from the laboratory facility.*

8. Why did Notusa engage in biological weapons research? Was it in order to form some sort of antidote or cure to the bio agent, or was it rather to form an enhanced weapon?
 - a. *Notusa claims its efforts are purely defensive, but that defensive capabilities are not restricted simply to antidote production.*

9. How many contained samples of the weaponized virus were there, and is it to be assumed that the missing two containers were stolen?
 - a. *According to official government reports, at least twelve samples of the agent were exposed or compromised. Ten were recovered, though it was confirmed that “several” of these ten samples’ containers and safeguards were breached. The other two unaccounted samples are assumed either stolen or destroyed. Noone has come forward to claim they have the samples, but intelligence reports suggest there is a high likelihood that these samples are currently in the hands of the Notexican People’s Liberation Front (NPLF).*

10. What is the definition of “alien”?
 - a. *The Notusan Immigration and Nationality Act (NINA) defines an alien as “any person not a citizen or national of Notusa”. According to the law, in Notusa, aliens can be categorized as both resident and nonresident, asylee and refugee, and documented or undocumented. There is no official definition for aliens not of this planet in the Notusan legal code or Constitution. It, however, is clear from the transcripts that Mr. Karlsson meant extraterrestrials when referring to aliens in his broadcasts.*

11. Did Karlsson ever gather protestors in the past? If so, was he successful in his call to action? How many people attended? Did any protests turn violent?
 - a. *Karlsson has a long history of rallying support for various political and often anti-government causes. His tenure as a respected international and human*

rights reporter early in his career has leant credibility to his more outlandish and “shock” reporting later in his career. He has spoken at rallies of several thousand people, and his remote broadcasts often draw large crowds. Arrests for public intoxication or disturbing the peace are not uncommon at these events, but no violence on this scale has occurred before.

- 12.** Were the protestors at the January 5 Riot planning to riot regardless of Karlsson’s presence, or did they specifically because Karlsson failed to show?
 - a.** *There are no interviews that suggest riots were pre-planned regardless of Karlsson. The crowd definitely became more agitated because of his failure to appear, which led to increased tension between security and the crowd. Without Karlsson’s presence, other, less diplomatic crowd members took over speaking and leadership duties, which certainly also led to the confrontation. It is impossible, however, to determine the crowd’s collective intent before the riot.*

- 13.** Based on his source, did Karlsson have a rational basis to believe that the government of Notusa was engaged in illegal activity? If so, was this his rationale in calling the supporters to Verboten Funfzig?
 - a.** *Karlsson has refused to name his source, but has sworn under oath that his source is a high-ranking military official who has worked within the Verboten Funfzig, and that this official has provided him intelligence in the past that has been confirmed. He also stated in his deposition that his source was obviously accurate, since illegal activity WAS taking place. Whether or not the source was misled about extraterrestrial aspects of the situation, or Karlsson added this aspect for entertainment value and hype, or if the source and/or Karlsson simply were acting on vague supposition and got lucky, is unclear.*

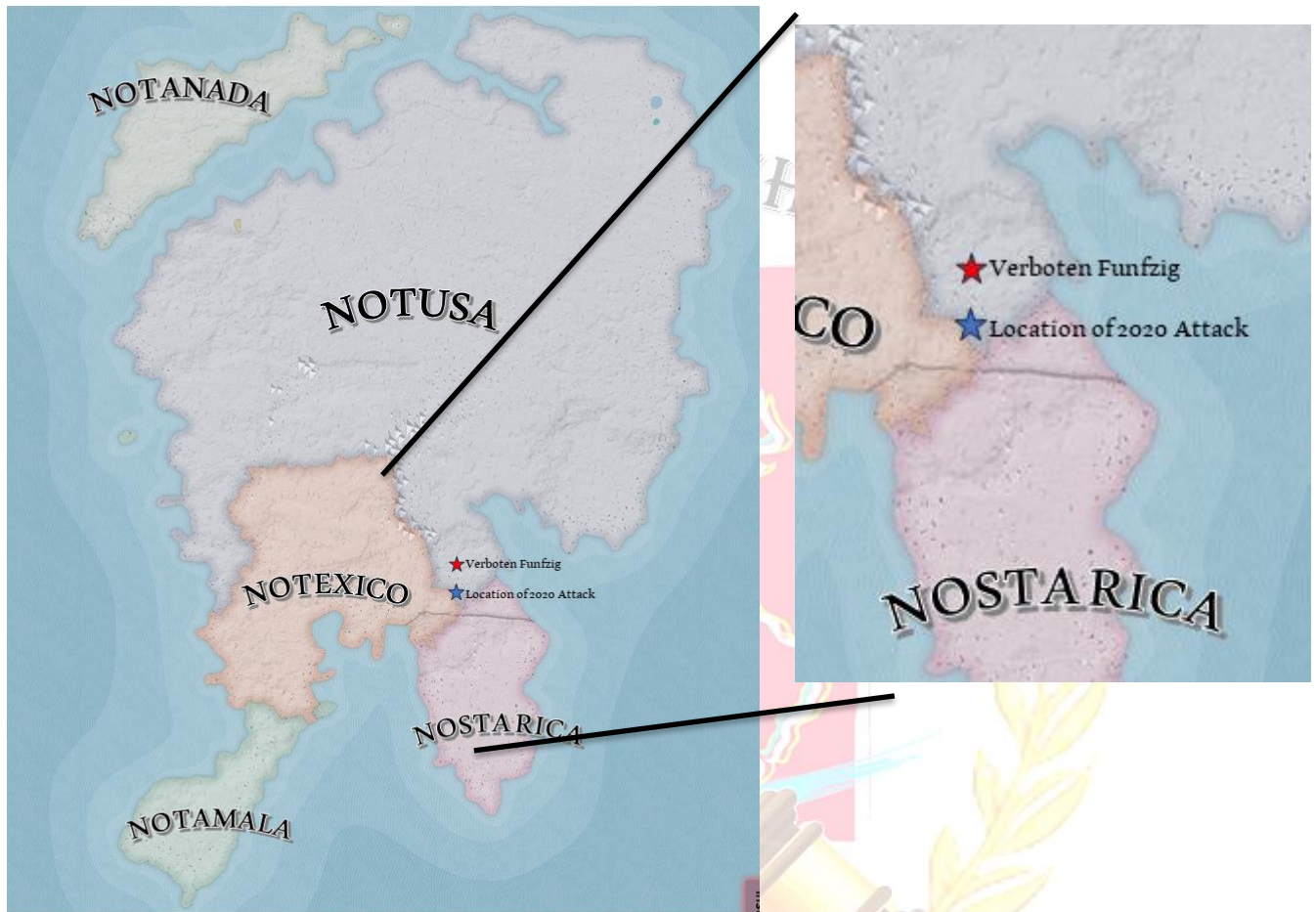
- 14.** It is suggested in the hypothetical that the biological agent research was not in direct response to the terrorist attack of 2020. If so, what was the true rationale for Notusa’s bio weapons research?
 - a.** *Notusa repeatedly claims that its research into biological weapons and counter-terrorism has been in response to the NPLA’s incursions and consistent threat along the border. However, the Verboten Funfzig certainly existed and was conducting research well before and well after the events of 2020. The NPLA and other groups claim that Notusa’s research is part of a larger military operation intended to expand Notusan territory into Notexico or to wage war elsewhere for national interests and profit, and that it is the border threat. NPLA states that it lacks the military and the funding to coordinate the kinds of activities Notusa claims to be protecting itself against, and that the 2020 attack was a small-scale attack carried out by a militant wing that had obtained rudimentary forms of ricin and other gas, and that the Notusan bio weapons project dwarfs that by a factor of 100. Notusan authorities will suggest that the research is necessary to*

counteract terrorist activities and ensure national security, and that NPLA is a larger threat than it claims to be.

- 15.** Was Karlsson’s radio station aware of his cult following? Were they aware of any imminent lawless action that may have resulted from the cult following?
- a.** *Karlsson’s radio station is keenly aware of his cult following—the listener base is the primary reason Karlsson was brought onto the station and the reason the show “Fighting for the Truth” became so popular. After its debut in 2021, when the show was only carried on station Radio Five (based in Nopus Christi, Notusa), listenership grew exponentially. By 2022, “Fighting for the Truth” became a syndicated program owned by a production company headed by a Board of Directors that includes Karlsson, original radio station owner Marius Bardo, and several members of the National Right to Freedom Party (NRF), a political action committee that Karlsson endorses. The syndicated program brings in significant advertising income for local stations carrying it (and there are now dozens of local stations carrying the show). Much of the income brought in by the production company is donated back to the NRF to support candidates in local elections. The NRF is a staunch opponent of the policies of the current administration.*
- 16.** How old was Geraldo Karlsson at the time of sentencing?
- a.** *Mr. Karlsson was 62 years old.*
- 17.** In what way were the virus samples found at Verboten weaponized?
- a.** *They were not used as weapons in this case; rather, the containment system was breached, and people were exposed to the biological agents as a result. As for how the virus was intended to be used militarily, Notusa affirms its statement that the virus is not for use in warfare, but was rather being studied for “national defense”.*
- 18.** Under what legal grounds did the Inter-American Commission hold that Mr. Karlsson should be subject to jail time?
- a.** *The Commission did not rule with regard to the justification of jail time. Its recommendations included the shortening of his sentence, however, as a compromise—respect of national legal authority over national security issues, but admission that Mr. Karlsson should not have treason status, at the very least.*
- 19.** What allegations were brought against Mr. Karlsson in the four civil suits?
- a.** *In all four, the crux of the cases was that Mr. Karlsson used his media platform irresponsibly and created a situation in which people could be harmed, and that his negligence (both in creating the situation and in not appearing at the rally to squelch the behavior) resulted in the death and injury of others.*

20. How much of the \$2 million fine was paid by the network and how much by Mr. Karlsson?
- Details of the settlement arrangement are sealed, but the generally accepted stipulation is that the production company (of which Mr. Karlsson is a majority shareholder) paid the entirety of the fine.*
21. Was it confirmed that the three members of the crowd and the military policeman were shot by rioters?
- Two members of the crowd were shot and killed by military police. One crowd member was trampled. The military policeman was shot by a crowd member who is currently on trial for capital murder.*
22. Does a transcript exist of the announcement mentioned in Paragraph 3 of Section III that initiated the riot?
- There was no official announcement; word simply spread through the crowd.*
23. What was the violation of Articles that the Commission specified in its report on the merits?
- The Commission did not rule on all alleged violations of articles listed by Mr. Karlsson, but did find enough evidence that articles 13, 15, and 16 had been violated to recommend the case be heard.*
24. What is Mr. Karlsson's personal and family history of mental illness?
- Mr. Karlsson has no previous record of mental illness or instability.*
25. Was the identity of Mr. Karlsson's unnamed source ever revealed?
- Mr. Karlsson refuses to reveal his source. See also Question 13.*

X. APPENDIX- Map



IACHR MOOT COURT COMPETITION
CONCORDIA UNIVERSITY AUSTIN, TX