**THE 2024 EUGENE SCASSA MOCK OAS PROGRAM INTER-AMERICAN COURT OF HUMAN RIGHTS MOOT COURT COMPETITION**

**IN THE INTER-AMERICAN COURT OF HUMAN RIGHTS**

**April 2024**

**“GERALDO KARLSSON”**

*Petitioner*

**v.**

**“THE REPUBLIC OF NOTUSA”**

*State*

**MEMORIAL FOR THE STATE**

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**STATEMENT OF FACTS**

Geraldo Karlsson was a Notusan journalist who had become highly respected among his industry during his work at National Public Radio (NPR).[[1]](#footnote-1) After his subsequent retirement from NPR, Mr. Karlsson's views became more and more radicalized, and he became a guest of multiple political radio and television programs where he questioned the integrity of the Notusan government and its leaders.[[2]](#footnote-2) In November 2021, Mr. Karlsson would become the host of the radio show “Fighting for the Truth”.[[3]](#footnote-3) During his time as host of the show, Mr. Karlsson was warned multiple times by the controlling body of Notusan broadcasting, the National Communication Conference (NCC), that his broadcasts were “irresponsible” and could possibly cause civil unrest based on his broadcasting of misinformation.[[4]](#footnote-4) The NCC had also threatened to fine or revoke Mr. Karlsson’s broadcasting license for the foregoing reasons, but as of January 12, 2022, no action had been taken.

On December 15, 2021, Mr. Karlsson began a broadcast where he discussed his speculations about the nature of the research being conducted at Verboten Funfzig, the Notusan government's foremost top-secret research facility. [[5]](#footnote-5) Mr. Karlsson said that the research being conducted was related to extraterrestrial life and constituted a threat to the Notusan civilian population.[[6]](#footnote-6)

In later subsequent broadcasts, Mr. Karlsson would advertise a “demonstration day” on January 5, 2022, at Verboten Funfzig in order to demand answers from the government and reminded his audience that they must “do whatever necessary” to reveal the truth.[[7]](#footnote-7) Additionally, Mr. Karlsson told his followers that “The revolution is just getting started…” and that they “...may need to break in there by force” and that “...the only way to uncover the truth is to take bold action”.[[8]](#footnote-8)

On January 5, 2022, over 9,000 followers of Mr. Karlsson’s show arrived at the front gates of Verboten Funfzig, with some supporters carrying concealed firearms.[[9]](#footnote-9) After a standoff that lasted several hours, it was announced that Mr. Karlsson himself would not be attending the rally and was in fact broadcasting from a hotel in a nearby town.[[10]](#footnote-10) After this announcement, Karlsson’s supporters began to riot and subsequently stormed the gates of Verboten Funfzig by force. One military policeman and three members of the crowd were shot and killed during the assault, and two other citizens were trampled to death by the rioting crowd.[[11]](#footnote-11)

By 6:00 PM, Mr. Karlsson’s supporters had stormed the facility and broken into its central laboratories, where a weaponized virus similar to Bolivarian Hemorrhagic Fever was being studied. This research was being conducted for national security purposes in order to better defend against biological terrorist attacks[[12]](#footnote-12). The majority of the research conducted on the virus was after a biological terrorist attack in 2020 by several Notexican terrorist organizations, which resulted in the deaths of multiple military personnel and asylum seekers.[[13]](#footnote-13) When Mr. Karlsson’s supporters stormed the facility, some of them stole and compromised multiple containers storing the virus, leaving nine out of ten dead within a week of exposure. Two containers remain unaccounted for.[[14]](#footnote-14)

On January 12, 2022, Mr. Karlsson was arrested by Notusan Federal Police[[15]](#footnote-15), and on February 20, 2022, was charged with seditious acts by the National Criminal Court of Notusa and sentenced to the maximum of twenty years in federal prison.[[16]](#footnote-16) Additionally, four civil lawsuits were brought against Mr. Karlsson and his employing broadcasting network, with two being settled out of court for $2 million in damages and the other cases still pending.[[17]](#footnote-17)

Mr. Karlsson filed appeals for his case in March 2022 and October 2022, both being rejected by the Notusan Supreme Court on the grounds that there was no new evidence to overturn his original conviction.[[18]](#footnote-18)

On January 8, 2023, Mr. Karlsson filed an individual petition before the Inter-American Commission of Human Rights (IACHR), claiming that the government of Notusa had violated multiple rights specified in the American Convention on Human Rights (ACHR).[[19]](#footnote-19) The commission then issued its report on the merits of the case on June 8, 2023, and gave recommendations for Notusa to implement.[[20]](#footnote-20) The Republic of Notusa declined to implement these recommendations, and thus the case was admitted to the Inter-American Court of Human Rights on October 15, 2023.[[21]](#footnote-21)

**LEGAL ANALYSIS**

**Statement of Jurisdiction**

The Republic of Notusa became a founding member of the Organization of American States (OAS) in 1945 and has recognized the jurisdiction of the Inter-American Court of Human Rights (IACHR) since 1988.[[22]](#footnote-22)

**Exhaustion of Remedies**

Mr. Karlsson filed appeals for his case in March 2022 and October 2022, both being rejected by the Notusan Supreme Court on the grounds that there was no new evidence to overturn his original conviction.[[23]](#footnote-23) On January 8, 2023, Mr. Karlsson filed an individual petition before the Inter-American Commission of Human Rights (IACHR), claiming that the government of Notusa had violated multiple rights specified in the American Convention on Human Rights (ACHR).[[24]](#footnote-24) The petition began processing on January 15, 2023, and the IACHR allowed the Republic of Notusa 45 days to submit a reply to the IACHR on the merits of the case.[[25]](#footnote-25) After the State’s reply, on June 8, 2023, the IACHR issued a report of the merits of the case, including recommendations for the Republic of Notusa to implement. These recommendations included the reduction of Mr. Karlsson’s sentence to no more than five years, the revocation of his broadcasting license, the decommissioning of biochemical weapon laboratories and storage facilities at Verboten Funfzig, and to further cooperate with the United Nations regarding possible violations of the Biochemical Weapons Convention (BWC).[[26]](#footnote-26)

The Republic of Notusa declined to implement all recommendations given by the IACHR, and subsequently on October 15, 2023, the case was submitted to the Inter-American Court of Human Rights for adjudication.[[27]](#footnote-27)

**Alleged Violations**

**American Convention on Human Rights**

In a report on the merits of the case by the Inter-American Commission on Human Rights, the commission argued that there was evidence that possible violations of articles 13, 15, and 16 of the American Convention on Human Rights (ACHR) occurred.[[28]](#footnote-28) Thus, the state would like to refute those allegations first, and then move onto the other alleged violations put forward by Mr. Karlsson himself in his individual petition.

The commission asserted that there was evidence that article 13 of the ACHR was violated. Article 13’s primary purpose is to protect the “right to freedom of thought and expression”.[[29]](#footnote-29) However, there are additional sub-articles that specify further actions a government may take in some instances. Article 13.2 states that there is a right to impose liability on individuals, specifically in order to protect national security, public order, and public health.[[30]](#footnote-30) It is in light of this exception that the state argues no violations of article 13 occurred. The state has the explicit right to hold Mr. Karlsson liable after the events of January 5th occurred, which caused a direct breach of national security. Because Mr. Karlsson’s instigations have led to a national security crisis and significant loss of life, the Republic of Notusa believes that it *must* hold Mr. Karlsson liable for the events of January 5th through his multiple calls to his audience to use force at Verboten Funfzig. These calls to use force include Mr. Karlsson saying: “We may even need to break in there by force”[[31]](#footnote-31), “But sometimes, the only way to uncover the truth is to take bold action”[[32]](#footnote-32), and that they would “do whatever was necessary to hold the government accountable for its actions”.[[33]](#footnote-33) Based on Mr. Karlsson’s own words, the fact that his followers committed violence at Verboten Funfzig should not be surprising. Additionally, due to article 13.5 of the ACHR, the state has the right to punish by law any advocacy of national hatred that constitutes incitement to lawless violence.[[34]](#footnote-34) Since Mr. Karlsson advocated hatred towards the Notusan government and its employees, and through his incitements of violence threatened the lives of the government personnel at Verboten Funfzig, he can be lawfully punished under the ACHR.

The commission might have also had concerns about the possibility of prior censorship on Mr. Karlsson’s broadcasts, and the state would like to address these possible concerns. There was no prior censorship of Mr. Karlsson’s broadcasting before January 12, 2022. The National Communication Conference (NCC) had issued multiple warnings to Mr. Karlsson that his radio show was at risk being fined or possibly having its broadcasting license revoked due to his show spreading misinformation and potentially causing civil unrest based on his inaccurate reporting.[[35]](#footnote-35) This does not constitute prior censorship since no actual actions (such as fines or penalties) were taken as of January 12, 2022.[[36]](#footnote-36) Mr. Karlsson was free to broadcast his radio show to the public without any restrictions by the Notusan government (even to the risk of the lives of government employees), and the warnings he did receive about the (rightly) dangerous nature of his show were clearly not heeded by him or his broadcasting company. Thus, these warnings had no discernible impact on Mr. Karlsson’s decision to continue broadcasting, and cannot in of itself constitute prior censorship of Mr. Karlsson’s material. Additionally, even if Mr. Karlsson’s attorneys were correct and his radio show was only “entertainment”[[37]](#footnote-37), that only gives the state the right to conduct prior censorship on his material due to article 13.4 of the ACHR.[[38]](#footnote-38) Unfortunately for Mr. Karlsson, he cannot argue that his broadcasts only functioned as entertainment and simultaneously complain about possible prior censorship that the state has the right to conduct on his “entertainment”. However, there was no prior censorship by the government, and Mr. Karlsson’s media was not just mere entertainment. Thus in either case, the state would be justified in its actions no matter what the commission might have suspected as being prior censorship or violations of his other article 13 rights. Due to these reasons, the state argues that the Republic of Notusa has not violated article 13 of the ACHR.

The commission has also voiced concerns about possible violations of article 15 of the ACHR. Article 15 states: “The right of peaceful assembly, without arms, is recognized. No restrictions may be placed on the exercise of this right other than those imposed in conformity with the law and necessary in a democratic society in the interest of national security, public safety or public order…”.[[39]](#footnote-39) The state is pleased to address these concerns. In specific regards to Mr. Karlsson, his right to peacefully assemble was not violated. On January 5th, Mr. Karlsson felt that “it was appropriate to broadcast from a safer and more secure location”[[40]](#footnote-40) and assembled at a hotel located in a town near Verboten Funfzig.[[41]](#footnote-41) Mr. Karlsson was not prevented from assembling at that location to broadcast his demonstration, and so there was no violation of his right to assemble peacefully. Additionally, Mr. Karlsson was not charged and convicted of his *participation* in the rally at Verboten Funfzig (which he was not present for), but rather of his conspiring to commit seditious acts.[[42]](#footnote-42) The conviction of seditious conspiracy does not require that Mr. Karlsson was an active rioter on January 5th, only that he was a key organizer, advertiser, and coordinator (i.e. conspirator) of the opposition to government authority by force[[43]](#footnote-43) at Verboten Funfzig, which resulted in the deaths of Notusan military personnel and many others, as well as the theft of federal property. Mr. Karlsson’s right to peacefully assemble has no relation to the charges he was convicted of. Thus, the state argues that at no point was Mr. Karlsson’s right to assemble ever violated.

Lastly, the commission cited concerns about possible violations of article 16 of the ACHR.[[44]](#footnote-44) Article 16.1 states that “Everyone has the right to associate freely for ideological, religious, political, economic, labor, social, cultural, sports, or other purposes”.[[45]](#footnote-45) The state rejects the allegation that Mr. Karlsson’s right to associate has been violated. Prior to the insurrection on January 5th, Mr. Karlsson was not prohibited from associating with any individuals, including members of opposing political parties such as the National Right to Freedom Party (NRFP).[[46]](#footnote-46) Therefore in this way article 15 has not been violated. However, the commission might have had concerns that Mr. Karlsson was convicted solely based on his associations with individuals who participated in the January 5th insurrection. The state would now like to take the appropriate time to refute these concerns. Mr. Karlsson was not arrested for his associations with individuals who directly violated Notusan law, but rather for his direct contribution to the incitement of insurrection and the seditious conspiracy to create that insurrection. As stated previously on page 9, Mr. Karlsson directly advocated for the use of force against the Notusan government in order to validate his asinine conspiracy theories about Verboten Funfzig. Based on the resulting events, his remarks constitute incitement of insurrection, which is punishable by Notusan sedition law.[[47]](#footnote-47) Furthermore, by telling his followers when and where to assemble, and thus being the key organizer of this event, Mr. Karlsson can be regarded as a member of a seditious conspiracy. Mr. Karlsson’s instructions for the use of force had a direct impact on the crowd, a large enough group of which carried semi-automatic weapons, knives, and other improvised wooden weaponry[[48]](#footnote-48) to use against the Notusan government. It is by Mr. Karlsson’s direct instructions that his followers may need to use force that they showed up to a “peaceful” demonstration prepared for the exact opposite. Therefore, Mr. Karlsson is not a mere associate of individuals who happened to make foolish choices that day, but a direct instigator and coordinator of the entire demonstration and subsequent insurrection. An insurrection which resulted in the deaths of 15 Notusan citizens and the high probability that two containers of an extremely deadly biological virus are now in the hands of a Notexican terrorist organization.[[49]](#footnote-49) As such, the state reserves the right to charge Mr. Karlsson for his actions regarding the January 5th insurrection, charges which are not brought on solely his association with other insurrectionists, but with his clear instigation and involvement in the planning and actions of that day. Thus, the Republic of Notusa argues that article 16 of the ACHR has not been violated concerning its conduct towards Mr. Karlsson. In conclusion, the state respectfully denies all allegations put forward by the commission concerning the possible violations of articles 13, 15, and 16 of the American Convention on Human Rights.

Additionally, Mr. Karlsson himself alleges multiple violations of the ACHR in his own individual petition, specifically the rights listed in articles 5.3, 5.6, 7.6, 13, 15, 16, and 22 respectively.[[50]](#footnote-50) As articles 13, 15, and 16 have already been discussed, their analysis will not be included in this section.

The Petitioner has alleged that the Republic of Notusa has violated article 5.3 of the ACHR, which states: “Punishment shall not be extended to any person other than the criminal”.[[51]](#footnote-51) This is incorrect. Mr. Karlsson was specifically charged with seditious acts, which includes the seditious conspiracy as prescribed in Chapter 115 Article 204, as well as incitement to insurrection as found in Chapter 115 Article 203[[52]](#footnote-52). Defined in the first article, Seditious Conspiracy includes “If two or more persons in Notusan territory…conspire to…oppose by force the authority thereof [the government], or by force 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…”.[[53]](#footnote-53) Mr. Karlsson is considered a criminal under Notusan law in that he is viewed as a key conspirator in the events of January 5th. Mr. Karlsson was the principal coordinator and organizer of the rally at Verboten Funfzig, which without his exhortations, would not have taken place. When Mr. Karlsson’s supporters arrived at Verboten Funfzig, they carried signs showing quotes from his own show, showing the impact he had over his fellow insurrectionists.[[54]](#footnote-54) Mr. Karlsson encouraged his audience multiple times that violence may be necessary in order to stop the “alien conspiracy at the highest government level”[[55]](#footnote-55), and unsurprisingly, violence did occur. However, instead of uncovering the “truth”, Mr. Karlsson's actions led to 15 deaths in the course of one week. He organized a segment of the population that refused to obey Notusan law on the day of the rally. Mr. Karlsson conspired to prohibit the proper enforcement of Notusan law by force, and thus he was rightly charged by the government of Notusa for seditious acts and sentenced for his crimes.

Furthermore, his conviction of seditious acts was also because of his incitement to insurrection. As stated in Chapter 115 Article 203: “Whoever incites…any rebellion or insurrection against the authority of Notusa or the laws thereof…shall be…imprisoned not more than twenty years”.[[56]](#footnote-56) In the eyes of the Notusan government, Mr. Karlsson is guilty of inciting insurrection against its authority. Mr. Karlsson’s multiple calls to use force[[57]](#footnote-57) at Verboten Funfzig constitute incitement, and Mr. Karlsson continued his broadcasting in spite of the warnings given by the NCC that his radio show had the potential to cause civil unrest. Unfortunately, Mr. Karlsson’s incitements have not just caused civil unrest, but the deaths of 15 citizens and a national security crisis. Due to this, the government of Notusa has the right to hold Mr. Karlsson accountable for the incitement of the insurrection that occurred on January 5th. Mr. Karlsson has direct responsibility for the events that transpired on January 5th, 2022, and thus punishment is being properly extended to the criminal at fault. Because of the forgoing reasons, article 5.3 has not been violated.

The Petitioner also alleges that article 5.6 of the ACHR has been violated. Article 5.6 states “Punishments consisting of deprivation of liberty shall have as an essential aim the reform and social readaptation of the prisoners”.[[58]](#footnote-58) This is a concern that the government of Notusa takes seriously. Mr. Karlsson has been sentenced to the lawful maximum of 20 years in prison in accordance with his conviction of seditious acts.[[59]](#footnote-59) At his current age, at the very most he will be released from prison at 82 years of age (not including possible early release on parole, etc.).[[60]](#footnote-60) The Republic of Notusa believes that this length of sentencing is appropriate based on the severity of the crime committed. Mr. Karlsson has a degree of responsibility in the deaths of six individuals at Verboten Funfzig and the subsequent deaths of nine others due to their contamination of a highly dangerous virus that was being researched at the facility.[[61]](#footnote-61) Two containers of this agent were stolen by Mr. Karlsson’s supporters, and are now believed to be in the hands of the terrorist organization known as the Notexican People's Liberation Front (NPLF).[[62]](#footnote-62) The Republic of Notusa has already painfully dealt with severe biological weapon attacks, which have not only killed Notusan military personnel but also Notexican asylum seekers as well,[[63]](#footnote-63) which Notusa has a direct responsibility to protect pursuant to articles 5.1, 5.2, and 22.7 of the ACHR. Most importantly, the state recognizes the significance of articles 30 and 32.2 of the ACHR. Article 30 states: The restrictions that, pursuant to this Convention, may be placed on the enjoyment or exercise of the rights or freedoms recognized herein may not be applied except in accordance with laws enacted for reasons of general interest and in accordance with the purpose for which such restrictions have been established”[[64]](#footnote-64) and article 32.2 states: “The rights of each person are limited by the rights of others, by the security of all, and by the just demands of the general welfare, in a democratic society”.[[65]](#footnote-65) Through his actions, Mr. Karlsson has threatened not only the security of Notusan citizens, but possibly the entire world population by inciting an insurrection that has caused an extremely deadly biological agent, of which nine out of ten exposed died within a single week,[[66]](#footnote-66) to now possibly be in the hands of a terrorist organization. The state believes that the commission also recognizes the danger posed by Mr. Karlsson’s release, which is why it continued to recommend the revocation of Mr. Karlsson’s broadcasting license and its compromise to affirm a prison sentence for Mr. Karlsson.[[67]](#footnote-67) Thus, in order to punish these crimes with the appropriate proportionality, in order to ensure effective deterrence against further insurrection and loss of life, and most importantly, in order to protect the rights and safety of all Notusans and even the greater population of the world, Mr. Karlsson’s sentence is appropriate given the circumstances. Mr. Karlsson’s crimes and potential future national security risks are grave enough that a maximum sentence is necessary. The state acknowledges that Mr. Karlsson, based on his age, might not get the chance to socially readapt back into public society. But based on the obligations put into recognized law by the ACHR, that our rights are limited by the security of all, the state unfortunately must uphold this sentence in order to prevent further civil unrest, insurrection, terrorism, anarchy, and the potential for an even greater loss of Notusan and non-Notusan life. While the state stands behind this conviction of belief, the state also affirms that pursuant to article 5 of the ACHR, Mr. Karlsson will be treated humanely during his time in prison and will not suffer any offense. The “respect for the inherent dignity of the human person”[[68]](#footnote-68) will be recognized to Mr. Karlsson, from now in the current time until his death, whether freed or in prison.

The Petitioner has alleged that article 7.6 of the ACHR has been violated. Article 7.6 states “Anyone who is deprived of his liberty shall be entitled to recourse to a competent court, in order that the court may decide without delay on the lawfulness of his arrest or detention and order his release if the arrest or detention is unlawful…”.[[69]](#footnote-69) The state argues that this right has not been violated. After his arrest, Mr. Karlsson was able to have attorneys for his defense at his trial in the National Criminal Court, and was also able to appeal the decision of that court to the National Supreme Court of Notusa, which constitutes a separate, competent court.[[70]](#footnote-70) Additionally, Mr. Karlsson was granted a speedy trial in accordance with article 7.5 of the ACHR, with his trial taking place a little more than one month after his arrest.[[71]](#footnote-71) Furthermore, the Supreme Court likewise processed his appeals in a timely manner, with both being analyzed and rejected in March and October the same year of his arrest.[[72]](#footnote-72) In this case, Mr. Karlsson effectively used his right to recourse to a competent court to rule on the nature of his deprivation of liberty, and the court chose to affirm the decision of the lower court. The fact that Mr. Karlsson’s appeals were lawfully rejected by the Supreme Court of Notusa on the grounds that there was no new evidence to overturn the conviction is not a violation of this right. Thus, the state has not violated article 7.6 of the ACHR in regards to its conduct during the judicial process of Mr. Karlsson.

The Petitioner has alleged that article 22 of the ACHR has been violated. Article 22 broadly protects the right to freedom of movement and residence.[[73]](#footnote-73) In specific regards to alleged violations, Mr. Karlsson’s attorneys voiced concerns about possible violations of section 4 of article 22, arguing that since in the attorney’s opinion Verboten Funfzig was conducting “illegal” activity that was not in the “public interest”, the protestors had a right to enter a top-secret research facility and should not have been restricted to do so.[[74]](#footnote-74) However, Mr. Karlsson’s attorneys must have failed to read all of the sections in article 22, as 22.3 explicitly allows restrictions of article 22 rights (most importantly article 22.1) in order to protect national security.[[75]](#footnote-75) Therefore, no rights of any individuals were violated by not allowing them access to a top-secret government research facility. However, this is irrelevant, as Mr. Karlsson himself was not present at the rally. Mr. Karlsson never attempted to demonstrate outside the gates of Verboten Funfzig, and thus article 22 is of no relevance, since he was never restricted access from any facility on the day of the rally. If the Petitioner wants to claim that they should have had access to the facility before January 5th, however, article 22.3 protects the right of the Notusan government to restrict access in order to protect national security, as previously stated. Thus, Mr. Karlsson’s article 22 rights have not been violated by the government of Notusa in any way.

**REQUEST FOR RELIEF**

The State requests that the IACHR find the state not at fault.

The State also requests that the IACHR uphold the judgments rendered by the National Criminal Court and Supreme Court of the Republic of Notusa.

1. Hypothetical II.1 [↑](#footnote-ref-1)
2. Hypothetical II.2 [↑](#footnote-ref-2)
3. Hypothetical II.2 [↑](#footnote-ref-3)
4. Hypothetical II.3 [↑](#footnote-ref-4)
5. Hypothetical III.1 [↑](#footnote-ref-5)
6. Hypothetical III.1 [↑](#footnote-ref-6)
7. Hypothetical III.2 [↑](#footnote-ref-7)
8. Hypothetical VII.1, VII.2 [↑](#footnote-ref-8)
9. Hypothetical III.3 [↑](#footnote-ref-9)
10. Hypothetical III.3 [↑](#footnote-ref-10)
11. Hypothetical III.3 [↑](#footnote-ref-11)
12. Hypothetical IV. 1 [↑](#footnote-ref-12)
13. Hypothetical V.3 [↑](#footnote-ref-13)
14. Hypothetical III.3 [↑](#footnote-ref-14)
15. Hypothetical IV.3 [↑](#footnote-ref-15)
16. Hypothetical IV.6 [↑](#footnote-ref-16)
17. Hypothetical IV.5 [↑](#footnote-ref-17)
18. Hypothetical IV.7 [↑](#footnote-ref-18)
19. Hypothetical V.1 [↑](#footnote-ref-19)
20. Hypothetical V.4 [↑](#footnote-ref-20)
21. Hypothetical V.5 [↑](#footnote-ref-21)
22. Hypothetical VI.2, VI.3 [↑](#footnote-ref-22)
23. Hypothetical IV.7 [↑](#footnote-ref-23)
24. Hypothetical V.1 [↑](#footnote-ref-24)
25. Hypothetical V.2 [↑](#footnote-ref-25)
26. Hypothetical V.4 [↑](#footnote-ref-26)
27. Hypothetical V.5 [↑](#footnote-ref-27)
28. Clarification 23 [↑](#footnote-ref-28)
29. ACHR 13.1 [↑](#footnote-ref-29)
30. ACHR 13.2 [↑](#footnote-ref-30)
31. Hypothetical VII.2 [↑](#footnote-ref-31)
32. Hypothetical VII.2 [↑](#footnote-ref-32)
33. Hypothetical III.2 [↑](#footnote-ref-33)
34. ACHR 13.5 [↑](#footnote-ref-34)
35. Hypothetical II.3 [↑](#footnote-ref-35)
36. Hypothetical II.3 [↑](#footnote-ref-36)
37. Hypothetical IV.4 [↑](#footnote-ref-37)
38. Hypothetical ACHR 13.4 [↑](#footnote-ref-38)
39. ACHR 15 [↑](#footnote-ref-39)
40. Clarification 6 [↑](#footnote-ref-40)
41. Hypothetical III.3 [↑](#footnote-ref-41)
42. Hypothetical IV.6 [↑](#footnote-ref-42)
43. Hypothetical VIII.3 [↑](#footnote-ref-43)
44. Clarification 23 [↑](#footnote-ref-44)
45. ACHR 16.1 [↑](#footnote-ref-45)
46. Clarification 15 [↑](#footnote-ref-46)
47. Hypothetical VIII.2 [↑](#footnote-ref-47)
48. Clarification 5 [↑](#footnote-ref-48)
49. Clarification 9 [↑](#footnote-ref-49)
50. Hypothetical V.1 [↑](#footnote-ref-50)
51. ACHR 5.3 [↑](#footnote-ref-51)
52. Hypothetical VIII.2, VIII.3 [↑](#footnote-ref-52)
53. Hypothetical VIII.3 [↑](#footnote-ref-53)
54. Hypothetical III.3 [↑](#footnote-ref-54)
55. Hypothetical III.2, VII.2 [↑](#footnote-ref-55)
56. Hypothetical VIII.2 [↑](#footnote-ref-56)
57. Hypothetical III.2, VII.2 [↑](#footnote-ref-57)
58. ACHR 5.6 [↑](#footnote-ref-58)
59. Hypothetical IV.6 [↑](#footnote-ref-59)
60. Clarification 16 [↑](#footnote-ref-60)
61. Hypothetical III.3 [↑](#footnote-ref-61)
62. Clarification 9 [↑](#footnote-ref-62)
63. Hypothetical V.3 [↑](#footnote-ref-63)
64. ACHR 30 [↑](#footnote-ref-64)
65. ACHR 32.2 [↑](#footnote-ref-65)
66. Hypothetical III.3 [↑](#footnote-ref-66)
67. Hypothetical V.4, Clarification 18 [↑](#footnote-ref-67)
68. ACHR 5.2 [↑](#footnote-ref-68)
69. ACHR 7.6 [↑](#footnote-ref-69)
70. Hypothetical IV.4, IV.7 [↑](#footnote-ref-70)
71. Hypothetical IV.3, IV.6 [↑](#footnote-ref-71)
72. Hypothetical IV.7 [↑](#footnote-ref-72)
73. ACHR 22 [↑](#footnote-ref-73)
74. Clarification 2 [↑](#footnote-ref-74)
75. ACHR 22.3 [↑](#footnote-ref-75)