

The Future of International Criminal Justice

Lecture to Students of the Université Saint-Esprit de Kaslik – April 2018

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Abstract

This paper addresses two distinct issues. The first part discusses recent updates of the Special Tribunal for Lebanon and the progress of the *Prosecutor v. Ayyash et al.* case. The second part evaluates the future of public international law; first, by looking at the historical development of international legal institutions; second, by outlining areas where the scope of international law might be expanded; and third, by evaluating the future development of procedural mechanisms. The prosecution of individuals for crimes of aggression, terrorism, ecocide, and attacks against religious and historic buildings are areas where international criminal law may further develop.

Part 1. An Update on the Judicial Proceedings before the STL

There have been a number of significant developments over the past year towards the finalization of the trial proceedings in the main case of *Ayyash et al.*, concerning the 14 February 2005 terrorist attack which killed former Lebanese Prime Minister Rafiq Hariri and 21 others.

Over the course of the past year, the Trial Chamber heard the remainder of the evidence in the prosecution case relating to the identity of the four accused and their alleged roles in the attack. As you may know, the prosecution case has proceeded in three main stages: the first stage centered round forensic evidence on the cause of the explosion on 14 February 2005 and evidence related to the death and injury of the victims. The second phase concerned evidence regarding the acts allegedly undertaken by the accused and their co-conspirators to prepare for attack and in coordinating an alleged false claim of responsibility. Finally, the third stage involved evidence relating to the identity of the accused and their respective roles in the attack¹.

The second and third phases, in particular, have been characterized by highly technical telecommunications evidence of the kind that has never before been received by an international tribunal and to a scale that is rarely seen on the domestic level². In doing so, the Tribunal is setting an important precedent in the presentation of telecommunications evidence relevant not only for the completion of our judicial work but likely to be critical to the resolution of future international crimes.

Besides, one of the key aspects of the proceedings at the Special Tribunal is that the victims, through their Legal Representatives, have an opportunity to present evidence in their own right³. In August 2017, six victims and an expert victimologist presented an in-court testimony, while 24 other victims had witness statements tendered into evidence⁴.

1. *Special Tribunal for Lebanon: Ninth Annual Report (2017-2018)*, 28 February 2018, p. 23.

2. L. FREEMAN, "Digital Evidence and War Crimes Prosecution: The Impact of Digital Technologies on International Criminal Investigations and Trials," *Fordham International Law Journal* 2018, vol. 41, n° 2, p. 308.

3. STL, *Prosecutor v. Ayyash et al.*, STL-11-01/TC, F3260, Decision on the Legal Representatives of Victims' Application to Call Evidence, Schedule the Presentation of Evidence and Directions on Disclosure Obligations, 31 July 2017, para. 92.

4. V. YAN, "Victims of Hariri Assassination Set to Testify at STL," *The Daily Star* (Lebanon), 16 October 2012.

Following the Victims' Case, the Prosecution witnesses resumed giving testimony and the Parties were afforded further opportunity to tender documents into evidence. In the course of 2017 alone, some 773 documents, totalling over 29,000 pages, were tendered into evidence or marked for identification⁵.

To provide an example of the scope of the evidence presented in the proceedings, by late last year: the testimony of some 300 witnesses was received into evidence; nearly 3,000 exhibits had been admitted into evidence; court hearings had generated over 70,000 pages of transcript, and the Chambers had collectively issued over 800 decisions⁶.

After finalizing the presentation of evidence, the Prosecution closed its case in February this year⁷. The Defence teams were then entitled to avail themselves of the procedure provided for under Rule 167 of the Special Tribunal's Rules of Procedure and Evidence the so-called "*no case to answer*" procedure⁸.

Under this Rule, the Trial Chamber shall enter a judgement of acquittal on any count charged in the Indictment against any of the accused after hearing submissions from the Parties, if it considered that there was "*no evidence capable of supporting a conviction*" on that count. Ultimately, only the Defence Counsel for the Accused Mr Hussein Hassan Oneissi made substantive submissions under Rule 167⁹.

On 7 March 2018, the Trial Chamber issued a decision dismissing the Oneissi Defence application for acquittal, clearing the way for the commencement of the Defence phase of the trial proceedings¹⁰.

5. *Special Tribunal for Lebanon: Ninth Annual Report (2017-2018)*, 28 February 2018, p. 17.

6. *Ibid.*, p. 8.

7. V. YAN, "Prosecution wraps up case on Hariri assassination at STL," *Daily Star* (Lebanon), 8 February 2018.

8. Rule 167 STL RPE.

9. STL, *Prosecutor v. Ayyash et al.*, STL-11-01/T/TC, F3549, Scheduling Order Regarding Close of Prosecution Case and Defence Submissions Under Rule 167, 2 February 2018, para. 2.

10. STL, *Prosecutor v. Ayyash et al.*, STL-11-01/T/TC, Transcript of 7 March 2018, p. 51.

As it stands, only the Oneissi Defence team has elected to call witnesses¹¹. The Trial Chamber has allocated two weeks of court time to this phase, subject to the availability of the witnesses to give evidence.

This is, of course, much shorter than the defence phases we are used to seeing, for example, at the *ad hoc* tribunals for Rwanda and the former Yugoslavia. Part of the reason the Defence phase will be so much shorter is that the Trial Chamber has already dedicated time to facilitating the admission of a lot of relevant documentary evidence tendered by the Defence during the prosecution case. Another reason is that the other three Defence teams did not elect to call witnesses.

At the conclusion of the Defence case, the Parties will file their final trial briefs. It will then be for the Trial Chamber to deliberate and draft the Trial Judgment. Most recent estimates suggest a judgment can be expected by the end of this year, subject of course, to the contingencies of trial¹². Any judgment is likely to be subject to an appeal, a process we foresee moving towards completion by the end of the Tribunal's current mandate.

11. STL, *Prosecutor v. Ayyash et al.*, STL-11-01/T/TC, F3650, Defence for Hussein Hassan Oneissi Request for Amendments to the Rule 128 Witness and Exhibit Lists and for the Admission of Documents used by DH0-001, 7 May 2018 (confidential with confidential annexes A-G), distributed 8 May 2018.

12. *Special Tribunal for Lebanon: Ninth Annual Report (2017-2018)*, 28 February 2018, p. 19.

Part 2. The Future of International Criminal Justice

From terrorism to environmental degradation, to the devastating humanitarian crises unfolding around the world, we live in a time when our most pressing problems extend across borders. As a result, the field of international criminal law has to evolve to meet the crises of our modern era. Although international criminal justice is relatively young and continually developing, the accumulated experience of the various international criminal courts allows us to look back and think about how the system is likely to develop in the future to fit our world's changing needs.

I will provide an overview of the history of international criminal law, and will then move on to look at how the system might develop: first, this paper will address the substantive law (which types of crimes will be dealt with at the international level in the future); and second, it will address the terms of procedural mechanisms (how will these crimes be prosecuted in the future, and before which types of courts).

A. A Brief History of International Criminal Law

The international criminal justice system developed into its modern form in the wake of the two World Wars. Following the First World War, international prosecutions for wartime conduct were envisaged by the Versailles Treaty¹³. In practice, these prosecutions never took place as Germany refused to surrender individuals for prosecution at the Allied powers' request, but eventually agreed to have these individuals tried in German courts instead; in addition, the German Emperor himself was granted asylum in the Netherlands.

There had also been plans during the inter-war years to establish an international criminal court to try those responsible for terrorism, but again these plans did not materialize¹⁴. Following the Second World War, these plans were implemented for the first time at the Nuremberg and Tokyo Tribunals. The Nuremberg Tribunal tried high-ranking German individuals for their alleged involvement in crimes against peace, war crimes and crimes against humanity – which are recognizable as the precursors to the international crimes

13. M. LEWIS, "Judicial Resistance? War Crime trials after World War I", *Oxford University Press Blog*, 30 January 2015, <<https://blog.oup.com/2015/01/world-war-one-war-crimes-trials/>>.

14. C. ÇAKMAK, *A Brief History of International Criminal Law and International Criminal Court*, Palgrave Macmillan, 2017, p. 45.

prosecuted today. The Nuremberg Charter also set out other important and enduring international criminal principles; for example, it became possible to try high ranking State officials for international crimes, and the accused could not escape criminal responsibility by claiming to have been acting under superior orders¹⁵.

During the Cold War decades that followed, no other international criminal tribunals were created, but work did continue behind the scenes, with the drafting of several proposals for the codification of various international crimes. With the end of the Cold War in the 1990s and the tragic events which took place in Rwanda and the former Yugoslavia, the United Nations Security Council took action under its binding Chapter VII powers to create the International Criminal Tribunals for Rwanda and the Former Yugoslavia (ICTR and ICTY), collectively known as the *ad hoc* tribunals¹⁶. These tribunals were given jurisdiction over war crimes, crimes against humanity and genocide. The ICTR concluded its work in 2015 and the ICTY closed its doors in December 2017. Together, these *ad hoc* tribunals' jurisprudence, Statutes and Rules of Procedure and Evidence form the basis for much of our current international criminal justice system and continue to be cited as precedent in the field¹⁷.

A few years later, in 1998, 120 States adopted the Rome Statute, the treaty that established the International Criminal Court (ICC). This treaty entered into force on 1 July 2002 (after 60 ratifications). The ICC opened its doors in March 2003. For the first time in the history of humankind, States decided to accept the jurisdiction of a permanent international criminal court for the prosecution of the perpetrators of the most serious crimes committed in their territories or by their nationals¹⁸. The ICC was given jurisdiction to try war crimes, crimes against humanity and genocide, and recently its jurisdiction was expanded to include the crime

15. *Ibid.*, p. 60.

16. *Ibid.*, p. 110 - 116.

17. V. NERLICH, "The Status of ICTY and ICTR precedent in the proceedings before the ICC," in *The Legal Aspects of International Organisation* (ed. C. STAHN and G. SLUITER), Martinus Nijhoff Publishers, 2009, p. 305.

18. C. ÇAKMAK, *A Brief History of International Criminal Law and International Criminal Court*, p. 206.

of aggression¹⁹. The ICC is intended to be a permanent court of universal membership. To date, 123 countries are State Parties to the Rome Statute²⁰.

Alongside these tribunals, a number of hybrid or internationalized tribunals were also created in response to specific situations related to individual States. They combine elements of international criminal law and procedure with domestic elements. The most prominent examples of internationalized courts are the Special Court for Sierra Leone, the Extraordinary Chambers in the Courts of Cambodia and, of course, the Special Tribunal for Lebanon (STL). The STL for example has jurisdiction over crimes (such as terrorism) originating in the Lebanese Criminal Code, its procedural rules are very similar to those of other international criminal courts, and its chambers are composed of both Lebanese and international judges²¹. It is also worth mentioning that a new internationalized court has also been set up in The Hague, to try those responsible for crimes committed in Kosovo²².

B. Extending the Scope of International Criminal Law

I will turn to the future of international criminal justice system, in particular to how its scope is developing, by briefly highlighting a few examples.

1. Aggression

First, it is important to note that the ICC's jurisdiction has recently been extended to include the crime of aggression. Alongside war crimes, crimes against humanity and genocide, the drafters of the Rome Statute envisaged the ICC's jurisdiction extending to the crime of aggression, once a definition had been agreed upon²³. An example of aggression might include a Head of State who orders his State's armed forces to invade a neighbouring State for the purpose of annexing that territory.

19. "Assembly Activates Court's Jurisdiction Over Crime of Aggression," *International Criminal Court* (Press Release), 15 December 2017, <<https://www.icc-cpi.int/Pages/item.aspx?name=pr1350>>.

20. Rome Statute of the International Criminal Court, 17 July 1998, 2187 U.N.T.S. 1. ("Rome Statute").

21. D. JACOBS, "The Unique Rules of Procedure of the STL," in *The Special Tribunal for Lebanon: law and practice* (ed. A. ALAMUDDIN *et al.*), Oxford University Press, 2014, p. 111.

22. Reuters Staff, "Special Kosovo War Crimes Court to be set up in The Hague," *Reuters* (Amsterdam), 15 January 2016.

23. C. ÇAKMAK, *A Brief History of International Criminal Law and International Criminal Court*, p. 92.

The crime of aggression was defined during the 2010 Kampala Review Conference, in essence, as criminalizing the conduct of those in leadership positions which manifestly violate the prohibition on the use of force found in the UN Charter²⁴. An additional set of cumulative conditions were also imposed at Kampala: the ICC would not be able to exercise jurisdiction over the crime of aggression until after 1 January 2017, once thirty State Parties ratified the amendments, and subject to a decision by the Assembly of States Parties to activate that jurisdiction²⁵. All these conditions have been met at the Assembly of State Party that took place in New York in December 2017. The ICC's jurisdiction over the crime of aggression is now activated. This is an important milestone in the development of international criminal law, and would significantly expand the ICC's scope of action and potential impact on the impunity still enjoyed by many.

This being said, this jurisdiction is valid only for the States who ratified the article related to the crime of aggression.

2. Terrorism

Second, there have been recent developments in the definition of terrorism as a stand-alone crime at the international level. While causing terror against the civilian population was already prohibited as a war crime, and was charged before the ICTY in the *Galić* case²⁶, the STL is the first international criminal tribunal to have jurisdiction over terrorism as a separate crime. The definition of terrorism for the purposes of the STL's jurisdiction comes from the Lebanese Criminal Code. However, when considering the question of this definition in 2011, the STL Appeals Chamber found that a definition for terrorism, comprising three key elements, had emerged under customary international law, and that the definition of terrorism under the Lebanese Criminal Code should be interpreted in light of this customary definition which is binding on all States, including Lebanon²⁷.

24. *Review Conference of the Rome Statute of the International Criminal Court*, ICC Doc, 21/12/2010, 31 May - 11 June 2010 (available at <https://asp.icc-cpi.int/iccdocs/asp_docs/ASP9/OR/RC-11-Part.II-ENG.pdf>), p. 18.

25. *Ibid.*, p. 19.

26. ICTY, *Prosecutor v Galić*, IT-98-29-A, 30 November 2006, para. 78.

27. STL, *Prosecutor v. Ayyash et al.*, STL-11-01/TC, F0936, Interlocutory Decision on the Applicable Law: Terrorism, Conspiracy, Homicide, Perpetration, Cumulative Charging, 16 February 2011, para. 85.

As such, the STL has taken the first step in identifying a common definition of terrorism under international law. Does the international community need to go further still? Should it define the crime of terrorism through an international treaty? Attempts to reach a common treaty-based definition date back to at least 1937 when a convention on the issue was adopted but never came into force, and these efforts continue to be central to the work of the United Nations and numerous other international and regional organisations. As the debate about preventing and combatting terrorism continues to occupy centre stage at the international level, the need for a codified common definition of terrorism may come into focus once more.

3. *Ecocide*

A third area of development in the scope of international criminal law is the proposed new crime of ecocide. Simply put, this would criminalize, at the international level, conduct which causes serious harm to the environment, such as intentionally releasing poisonous chemicals into a body of water used for fishing and drinking water by the local community. As was the case with the crime of terrorism, this type of conduct is already prohibited as a war crime under the ICC's Rome Statute, formulated as “[i]ntentionally launching an attack in the knowledge that such attack will cause [...] widespread, long-term and severe damage to the natural environment which would be clearly excessive in relation to the concrete and direct overall military advantage anticipated²⁸”.

However, in order to make the fight against environmental destruction more effective and to stigmatize this type of conduct in a way which accurately reflects humanity's common values and the urgency created by current environmental degradation, we may need to define ecocide as a stand-alone international crime.

4. *The Protection of World Cultural Heritage*

The protection of world cultural heritage has recently been subject of very interesting developments in international criminal law. I would like to shed light on the recent ICC trial judgment in the *Al Mahdi* case, in which an individual was found guilty, following an admission of guilt, of the war crime of intentionally directing attacks against religious and historic buildings²⁹. Although this type of crime has also been tried in the past before the ICTY

28. Art. 8 (b) (iv) Rome Statute.

29. ICC, *Prosecutor v. Ahmad Al Faqi Al Mahdi*, ICC-01/12-01/15-171, Judgement and Sentence, 27 September 2016, para. 11.

as one of multiple charges, it is significant that a conviction has taken place at the international level where the charges referred exclusively to this type of conduct. This may signal increased prominence being given to the investigation and prosecution of this type of crime in the future.

5. *What Do These Developments Tell Us?*

As you can see, these recent developments in the scope of international criminal justice closely mirror both the dominant issues faced by the international community and the continual development of our universal values. As humanity as a whole has changed its attitudes towards the waging of wars, the destruction of cultural and religious buildings, and the need to protect the environment, the international criminal justice system has started to move in the same direction.

C. How Will International Criminal Procedural Mechanisms Develop?

A brief examination of the history of the international criminal justice system shows the current institutional landscape is diverse and has developed in response to the changing needs of the international community. I have no doubt that this process will continue. However, the question remains: What type of judicial institution would best fit the society's future challenges, in light of the new international crises?

Since the adoption of the Rome Statute that established the International Criminal Court in 1998, its continually growing State membership seemed to signal a move towards universality. Regrettably, this year witnessed the departure of Burundi, the first State to ever withdraw from the International Criminal Court³⁰, as well as substantial discussion regarding the withdrawal of South Africa and Gambia, both which ultimately elected to remain a member to the Court³¹. The Philippines also submitted its notice of withdrawal from the Rome Statute on 19 March 2018, a withdrawal that will be effective one year later³². Nevertheless, the ICC currently has 123 member States, and its work has never been more important. Its proceedings

30. J. MOORE, "Burundi Quits International Criminal Court," *New York Times* (New York), 27 October 2017, <<https://www.nytimes.com/2017/10/27/world/africa/burundi-international-criminal-court.html>>.

31. S. ALLISON, "African revolt threatens international criminal court's legitimacy," *The Guardian*, 27 October 2016, <<https://www.theguardian.com/law/2016/oct/27/african-revolt-international-criminal-court-gambia>>.

32. Reuters Staff, "Philippines informs U.N. of ICC withdrawal Court Regrets Move," *Reuters* (Manilla), 16 March 2018, <<https://www.reuters.com/article/us-philippines-duterte-icc-un/philippines-informs-u-n-of-icc-withdrawal-court-regrets-move-idUSKCN1GS0Y5>>.

may lead to increased coherence in the development of international criminal law, as the same conduct is consistently criminalized around the world and criminal prosecutions and trials are centralised. Moreover, the closer the court is towards universality, the more likely it is that would-be perpetrators will fall under the court's personal and territorial jurisdiction and that the court will provide a deterrent effect.

Nevertheless, in recent decades, we have also witnessed a proliferation of internationalized criminal courts and tribunals, set up in response to specific incidents or situations in a particular State. The need for these internationalized tribunals alongside the ICC can partly be explained by the ICC's current lack of universal membership, such that the crimes committed in some States simply do not fall under the ICC's current jurisdiction³³. Another reason is that the jurisdiction of the ICC is limited for the time being to war crimes, crimes against humanity, genocide and aggression³⁴. Thus, the creation of situation-specific internationalised tribunals allows them to be formed in a way that deals with the situation at hand in the most effective way, for example, by giving the court jurisdiction over different crimes (like terrorism in the STL's Statute) or by creating an institutional framework which is better adapted to bringing justice to the victim communities (such as the mixed international and domestic judicial benches at the STL and the Special Court for Sierra Leone).

Considering possible directions for the field, it could be effective, for example, to have international courts of universal membership specialising in specific crimes, such as terrorism or ecocide. Alternatively, we could have internationalized or regional courts which deal with a multitude of international crimes within a certain region. Courts could be set up pre-emptively to deal with any international crimes committed in the future, or they could be set up on an *ad hoc* basis to deal with specific incidents. We could, of course, have a model comprising institutions which combine these different features in any number of ways, as the world's needs develop over time. But I believe it is worthwhile to regularly evaluate the merits of each type of institution, so that we may best serve the victims of international crimes and the challenges faced by the international community.

A different model, which would depart from the current international court-based system, would be the establishment of international criminal prosecutors, each specialised in a

33. Art. 12. Rome Statute.

34. Art. 5. Rome Statute.

particular type of crime such as terrorism or ecocide, who could carry out investigations and prosecutions of international crimes committed anywhere around the world (subject to a State's membership of the institution or other triggering mechanism). We can imagine that these international prosecutors could work in partnership with their domestic counterparts to bring cases before the relevant national courts; this would, of course, require States around the world to consistently give their domestic court's jurisdiction over international crimes. By using existing domestic court systems, the costs of prosecuting international crimes may be significantly reduced. On the other hand, the jurisprudence on international crimes may become increasingly fragmented as cases would be tried not in a centralised international court, but in a myriad of domestic courts from different legal traditions.

To conclude, I would like to note that, when considering the future of the international criminal justice system, the victims of these crimes should be at the forefront of our thoughts as we consider how the system can be adapted and enhanced to best serve their needs. The development of the international criminal justice system is the responsibility of all of us, as citizens of this world, and especially all of you, as the next generation.

BIBLIOGRAPHY

Primary Sources

Rome Statute of the International Criminal Court, 17 July 1998, 2187 U.N.T.S. 1.

Review Conference of the Rome Statute of the International Criminal Court, ICC Doc, 21/12/2010, 31 May - 11 June 2010 (available at https://asp.icc-cpi.int/iccdocs/asp_docs/ASP9/OR/RC-11-Part.II-ENG.pdf).

Case law

ICC, *Prosecutor v. Ahmad Al Faqi Al Mahdi*, ICC-01/12-01/15-171, Judgement and Sentence, 27 September 2016.

ICTY, *Prosecutor v Galić*, IT-98-29-A, 30 November 2006.

STL, *Prosecutor v. Ayyash et al.*, STL-11-01/T/TC, F3549, Scheduling Order Regarding Close of Prosecution Case and Defence Submissions Under Rule 167, 2 February 2018.

STL, *Prosecutor v. Ayyash et al.*, STL-11-01/T/TC, Transcript of 7 March 2018.

STL, *Prosecutor v. Ayyash et al.*, STL-11-01/TC, F0936, Interlocutory Decision on the Applicable Law: Terrorism, Conspiracy, Homicide, Perpetration, Cumulative Charging, 16 February 2011.

STL, *Prosecutor v. Ayyash et al.*, STL-11-01/TC, F3260, Decision on the Legal Representatives of Victims' Application to Call Evidence, Schedule the Presentation of Evidence and Directions on Disclosure Obligations, 31 July 2017.

STL-11-01/T/TC, F3650, Defence for Hussein Hassan Oneissi Request for Amendments to the Rule 128 Witness and Exhibit Lists and for the Admission of Documents Used by DH0-001, 7 May 2018 (confidential with confidential annexes A-G), distributed 8 May 2018.

Secondary Sources

ALLISON, Simon "African revolt threatens international criminal court's legitimacy," *The Guardian*, 27 October 2016, <<https://www.theguardian.com/law/2016/oct/27/african-revolt-international-criminal-court-gambia>>.

"Assembly Activates Court's Jurisdiction Over Crime of Aggression," *International Criminal Court* (Press Release), 15 December 2017, <<https://www.icc-cpi.int/Pages/item.aspx?name=pr1350>>.

ÇAKMAK, Cenap *A Brief History of International Criminal Law and International Criminal Court*, Palgrave Macmillan, 2017.

- FREEMAN, Lindsay “Digital Evidence and War Crimes Prosecution: The Impact of Digital Technologies on International Criminal Investigations and Trials,” *Fordham International Law Journal* 2018, vol. 41, n° 2, p. 283 et s.
- JACOBS, Dov “The Unique Rules of Procedure of the STL,” in *The Special Tribunal for Lebanon: law and practice* (ed. ALAMUDDIN Amal *et al.*), Oxford University Press, 2014.
- LEWIS, Mark “Judicial Resistance? War Crime trials after World War I,” *Oxford University Press Blog*, 30 January 2015, <<https://blog.oup.com/2015/01/world-war-one-war-crimes-trials/>>.
- MOORE, Jina “Burundi Quits International Criminal Court,” *New York Times* (New York), 27 October 2017, <<https://www.nytimes.com/2017/10/27/world/africa/burundi-international-criminal-court.html>>.
- NERLICH, Volker “The Status of ICTY and ICTR precedent in the proceedings before the ICC,” in *The Legal Aspects of International Organisation* (ed. STAHN Carsten and SLUITER Göran), Martinus Nijhoff Publishers, 2009.
- Reuters Staff, “Philippines informs U.N. of ICC withdrawal Court Regrets Move,” *Reuters* (Manilla), 16 March 2018, <<https://www.reuters.com/article/us-philippines-duterte-icc-un/philippines-informs-u-n-of-icc-withdrawal-court-regrets-move-idUSKCN1GS0Y5>>.
- Reuters Staff, “Special Kosovo War Crimes Court to be set up in The Hague,” *Reuters* (Amsterdam), 15 January 2016.
- Special Tribunal for Lebanon: Ninth Annual Report (2017-2018)*, 28 February 2018.
- YAN, Victoria “Prosecution wraps up case on Hariri assassination at STL,” *Daily Star* (Lebanon), 8 February 2018.
- YAN, Victoria “Victims of Hariri Assassination Set to Testify at STL,” *The Daily Star* (Lebanon), 16 October 2012.