

June 3, 2021

Attention: Karim Khan, Q.C.
Chief Prosecutor
International Criminal Court
Office of the Prosecutor
otp.informationdesk@icc-cpi.int
2500 CM The Hague
The Netherlands

Dear Mr. Khan, Q.C.

RE: Communication and Referral seeking a Preliminary Examination of the Prosecutor of the International Criminal Court be commenced *proprio motu* pursuant to Article 15 of the Rome Statute of the International Criminal Court

The herein is a Communication and Referral (the “Complaint”) seeking a Preliminary Examination of the Prosecutor of the International Criminal Court (ICC) be commenced *proprio motu* pursuant to Article 15 of the *Rome Statute of the International Criminal Court*¹ (the “Rome Statute”).

The Complainants are lawyers in the Member State of Canada. The accused/suspects are agents, employees or actors working for the Government of Canada (“GOC”) and the Government of Vatican City State/Holy See (“Vatican”). These agents, employees and actors would be specifically known by the GOC and Vatican via their respective records.

The Complaint is regarding the recent discovery of a mass unmarked grave of 215 Indigenous children who were under the forced care of the GOC and the Vatican. The death of the 215 Indigenous children resulted from their enrolment in the GOC residential school system forced on the Indigenous peoples of Canada by way of GOC legislation and administered by both the GOC and the Vatican. The specific school where the mass grave has been discovered is the Kamloops Indian Residential School in British Columbia. At one time, this school was the largest residential school in Canada. It was open and had students enrolled in it until 1978.

The Complainants submit the deaths, mass unmarked grave and general treatment of the 215 deceased children constitute crimes against humanity. The Complainants also submit it is likely other such mass graves exist elsewhere in Canada in or around other residential schools and have been covered up by the GOC and/or Vatican, their agents, employees, or actors, collectively or individually, just as the mass grave at Kamloops Residential School was.

The Indigenous people of Canada, and all people of Canada, need assurance that the agents, employees, and actors of the GOC and the Vatican behind these crimes against humanity are subject to justice and that justice is seen to be done. When actors within government of Nation States commit crimes against humanity, it is the role of the ICC Prosecutor to seek justice for the victims,

¹ *Rome Statute of the International Criminal Court*, 2187 U.N.T.S. 90

their families, and the international community in the event the Nation State does not do so. The Complaint seeks a *proprio motu* Preliminary Examination of the Prosecutor begin immediately.

Criteria to open investigation are met

For the ICC Prosecutor to open an investigation, there must be a reasonable factual basis for the Prosecutor to proceed with an investigation. In this context meaning:

- (a) crimes against humanity have been committed, and
- (b) the potential case arising from such investigation would appear to fall within the ICC jurisdiction.²

Both (a) and (b) will be dealt with in turn. Further, at (c) the principle of complementarity will be dealt with. The Complainants submit (a), (b), and (c) all support the Prosecutor *proprio motu* opening a Preliminary Examination.

(a) Crimes against humanity have been committed

Under the *Rome Statute* crimes against humanity are defined at Article 7 which states:

Article 7 Crimes against humanity

1. For the purpose of this Statute, "crime against humanity" means any of the following acts when committed as part of a widespread or systematic attack directed against any civilian population, with knowledge of the attack:

- (a) Murder;
- (b) Extermination;
- (c) Enslavement;
- (d) Deportation or forcible transfer of population;
- (e) Imprisonment or other severe deprivation of physical liberty in violation of fundamental rules of international law;
- (f) Torture;
- (g) Rape, sexual slavery, enforced prostitution, forced pregnancy, enforced sterilization, or any other form of sexual violence of comparable gravity;
- (h) Persecution against any identifiable group or collectivity on political, racial, national, ethnic, cultural, religious, gender as defined in paragraph 3, or other grounds that are universally recognized as impermissible under international law, in connection with any act referred to in this paragraph or any crime within the jurisdiction of the Court;
- (i) Enforced disappearance of persons;
- (j) The crime of apartheid;
- (k) Other inhumane acts of a similar character intentionally causing great suffering, or serious injury to body or to mental or physical health.

² SITUATION IN THE ISLAMIC REPUBLIC OF AFGHANISTAN [No. ICC-02/17 OA4](#) (March 5, 2020)

2. For the purpose of paragraph 1:

- (a) "Attack directed against any civilian population" means a course of conduct involving the multiple commission of acts referred to in paragraph 1 against any civilian population, pursuant to or in furtherance of a State or organizational policy to commit such attack;
- (b) "Extermination" includes the intentional infliction of conditions of life, inter alia the deprivation of access to food and medicine, calculated to bring about the destruction of part of a population;
- (c) "Enslavement" means the exercise of any or all of the powers attaching to the right of ownership over a person and includes the exercise of such power in the course of trafficking in persons, in particular women and children;
- (d) "Deportation or forcible transfer of population" means forced displacement of the persons concerned by expulsion or other coercive acts from the area in which they are lawfully present, without grounds permitted under international law;
- (e) "Torture" means the intentional infliction of severe pain or suffering, whether physical or mental, upon a person in the custody or under the control of the accused; except that torture shall not include pain or suffering arising only from, inherent in or incidental to, lawful sanctions;
- (f) "Forced pregnancy" means the unlawful confinement of a woman forcibly made pregnant, with the intent of affecting the ethnic composition of any population or carrying out other grave violations of international law. This definition shall not in any way be interpreted as affecting national laws relating to pregnancy;
- (g) "Persecution" means the intentional and severe deprivation of fundamental rights contrary to international law by reason of the identity of the group or collectivity;
- (h) "The crime of apartheid" means inhumane acts of a character similar to those referred to in paragraph 1, committed in the context of an institutionalized regime of systematic oppression and domination by one racial group over any other racial group or groups and committed with the intention of maintaining that regime;
- (i) "Enforced disappearance of persons" means the arrest, detention or abduction of persons by, or with the authorization, support or acquiescence of, a State or a political organization, followed by a refusal to acknowledge that deprivation of freedom or to give information on the fate or whereabouts of those persons, with the intention of removing them from the protection of the law for a prolonged period of time.

The 215 children found in the mass grave were undocumented deaths of missing children.³ As stated by Chief Harvey MacLeod in an interview on Friday May 28, 2021, regarding his attendance at Kamloops Indian Residential School in British Columbia:

It was assumed that they ran away and were never going to come back. We just never seen them again and nobody ever talked about them ... I just remember that they were here one day and they were gone the next.⁴

³ <https://www.cbc.ca/news/canada/british-columbia/tk-eml%C3%BAps-te-secw%C3%A9pemc-215-children-former-kamloops-indian-residential-school-1.6043778>

⁴ <https://www.ctvnews.ca/canada/we-do-not-want-this-to-be-hidden-remains-of-215-children-discovered-on-site-of-former-residential-school-1.5446837>

Jeanette Jules, another student at Kamloops Indian Residential School in an interview on Friday May 28, 2021 stated:

I would hear clunk, clunk...and it is one of the security guards...then the whimpers...the whimpers because here is the guy who molests people.⁵

This is not the last mass grave site of children who were victims of the agents, employees or actors working for the GOC and Vatican in the Canadian residential school system.⁶ The last residential school in Canada did not close until 1996.

In 2015, over 6 years ago, the Truth and Reconciliation Commission (TRC) chaired by the Hon. Murray Sinclair stated that though the recorded number of children who died in residential schools in Canada was only approximately 4100, the number would likely be between 5 to 10 times higher. The Calls to Action numbered 71-76 of the TRC specifically dealt with missing children in residential schools and called on the GOC and Vatican (Catholic Church) to assist in getting to the truth.⁷ The GOC and Vatican has done very little in this regard, however.

What happened to these 215 children, and likely others in other mass graves in and around residential schools throughout Canada, is evidence of murder, extermination, forcible transfer of a population, rape/sexual slavery, persecution against an identifiable group, enforced disappearance of persons, apartheid, and general inhumane acts of intentionally causing great suffering, or serious injury to the body or to mental or physical health. In short, the 215 children were victim of crimes against humanity at the hands of the agents, employees, and actors of the GOC and Vatican. There are likely far more such victims beyond these 215 children.

(b) Crime falls within the ICC jurisdiction

The jurisdiction over the matter considers the timing of the crime against humanity, the State parties to the crime etc.

(b) 1.1. Jurisdiction over time period of the crime

Under Article 24(1) of the *Rome Statute*, crimes against humanity committed prior to the *Rome Statute* coming into being on July 1, 2002 cannot be prosecuted. Under Article 25 3. (d) of the *Rome Statute* however, a person shall be criminally responsible and liable for punishment for a crime within the jurisdiction of the Court if that person in any way contributes to the commission of such a crime by a group of persons acting with a common purpose. It is respectively submitted that those within the GOC and Vatican that covered up and suppressed the crimes against humanity in this Complaint, continued to do so on and after July 1, 2002 and thereby contributed to the commission of the crime against humanity after July 1, 2002 as accessories after the fact. As stated by the TRC regarding abuses committed between 1940 and the closure of the residential schools in 1996:

The abuse discussed in this chapter goes far beyond harsh discipline: much of it is sexual in nature. It was painful and humiliating when it occurred, and left people damaged long after—often for life. The fact that there were few police investigations into these abuses, or criminal prosecutions of perpetrators, during the period of time that the schools were in

⁵ Ibid.

⁶ <https://www.cbc.ca/news/politics/kamloops-remains-debate-1.6046692>

⁷ https://ehprnh2mwo3.exactdn.com/wp-content/uploads/2021/01/Calls_to_Action_English2.pdf

operation is yet one more sign of the failure of the federal government to take its responsibility towards Indigenous children seriously. For the churches or the government to say that they did not know about the extent of the abuse amounts to an admission of a failure to properly manage the institutions under their control. Those who were aware of the abuse and failed to intervene appropriately were complicit in the abuse.⁸

Further, the Canadian statute implementing the *Rome Statute* domestically, the *Crimes Against Humanity and War Crimes Act*⁹ (CAHWCA), at s.3 permits the prosecution of crimes against humanity before July 1, 2002 for the “*persecution or any other inhumane act or omission that is committed against any civilian population or any identifiable group and that, at the time and in the place of its commission, constitutes a crime against humanity according to customary international law or conventional international law or by virtue of its being criminal according to the general principles of law recognized by the community of nations, whether or not it constitutes a contravention of the law in force at the time and in the place of its commission*”.

Under Article 21. 1. (c) of the *Rome Statute*, the ICC may apply the national laws of States that would normally exercise jurisdiction over the crime, provided that those laws are not inconsistent with the *Rome Statute* and with international law and internationally recognized norms and standards. Arguably, via Article 21. 1. (c), the expansion of the of the prosecutable time period of crimes against humanity created by the GOC via s.3 of the CAHWCA to earlier than July 1, 2002 could apply to the time period when the crimes against humanity committed against the 215 children took place.

As such, with respect to jurisdiction over the time of the crime against humanity in the herein Complaint, the ICC potentially has jurisdiction in two respects:

- (i) Conduct of the actors, employees, and agents of the GOC and Vatican in suppressing and covering up the crimes against humanity on and after July 1, 2002 and therefore contributing to the crime against humanity with the common purpose of covering it up as an accessory after the fact, in violation of Article 25 3. (d) of the *Rome Statute*; and
- (ii) The application of the CAHWCA which expands the prosecutable time period to earlier than July 1, 2002 for prosecution of crimes against humanity, as incorporated by reference via Article 21. 1. (c) of the *Rome Statute*.

(b) 1.2 Jurisdiction over the State Parties

The GOC

The GOC is a full party to the *Rome Statute*. There is no question in that regard with respect to the Prosecutor and ICC’s jurisdiction.

At s. 3 of the CAHWCA it states that Her Majesty in Right of Canada or a province is bound by the CAHWCA, meaning that the GOC can be prosecuted for its breach. At s.4(1)(b) it states every person is guilty of an indictable offence who commits a crime against humanity. Though it has been said that a case where the style of cause is “*Her Majesty in the Right of Canada v. Her Majesty in the Right of Canada*” sounds absurd, in Canada it is legally permissible. The GOC can and has

⁸ https://ehprnh2mwo3.exactdn.com/wp-content/uploads/2021/01/Volume_1_History_Part_2_English_Web.pdf

⁹ *Crimes Against Humanity and War Crimes Act*, S.C. 2000, c. 24

prosecuted itself for offences in the past, though not under the *CAHWCA*, yet. As the Canadian jurisprudence has held to date regarding the self-prosecution of the GOC:

The respondents argued that the prosecution of Her Majesty in Right of Canada by Her Majesty in Right of Canada creates an absurdity. While there may be conceptual difficulties, these must yield to the principle that Her Majesty in Right of Canada or a Province is not above the law. **When a statute that Parliament has made binding upon Her Majesty is violated in her name and on her behalf, the declarative effect of a finding of guilt is more important than the penalty imposed.**¹⁰ [Emphasis added]

Where a Canadian statute binds Her Majesty the Queen in the Right of Canada, the GOC can prosecute itself as an accused. The *CAHWCA* binds Her Majesty, and as such, the GOC can prosecute itself thereunder. Of course, the Prosecutor and the ICC cannot prosecute a Nation State itself under the *Rome Statute* alone, but the GOC via s.3 of the *CAHWCA* has expanded criminal liability for crimes against humanity to itself, thereby waiving sovereign immunity. Again, under Article 21. 1. (c) of the *Rome Statute*, the ICC may apply the national laws of States that would normally exercise jurisdiction over the crime, provided that those principles are not inconsistent with the *Rome Statute* and with international law and internationally recognized norms and standards. Arguably, s.3 of the *CAHWCA* could be applied via Article 21. 1. (c) of the *Rome Statute* and the GOC itself prosecuted as an accused by the ICC should the GOC fail to prosecute itself domestically under *CAHWCA*.

A prosecution under the *CAHWCA* requires consent of the Attorney General or Deputy Attorney General of Canada to commence domestically and such prosecution must be conducted by the Attorney General of Canada or counsel acting on their behalf. Crimes against humanity are therefore in the category of offences in Canada that cannot simply be commenced by the Royal Canadian Mounted Police (RCMP) or other police services.

The Attorney General of Canada is David Lamentti and he is copied herein.

Since 2006 Canada has had an independent federal prosecution service, the Public Prosecution Service of Canada (PPSC), created under the *Director of Public Prosecutions Act*.¹¹ The Director of the PPSC is Kathleen Roussel, and she is copied herein. Typically, it would be the PPSC acting as prosecutor on behalf of the Attorney General.

Should the GOC fail to prosecute itself for crimes against humanity in this Complaint by way of the Attorney General failing or refusing to consent to a prosecution under the *CAHWCA* so the PPSC can prosecute the GOC, the Prosecutor and ICC may have jurisdiction to prosecute the GOC as outlined above due the operation of Article 21. 1. (c) of the *Rome Statute*'s incorporation of the waiver of sovereign immunity in *CAHWCA*.

There is no doubt however, that the Prosecutor and ICC have jurisdiction over agents, employees and actors of the GOC who have committed or aided in the crimes against humanity giving rise to this Complaint.

¹⁰ *Pelletier v. R.* [1970] Ex. C.R. 2, *Way v. Canada and John Doe* (1993) 63 F.T.R. 24 and *Canada (Department of Fisheries and Oceans) v. Canada (Department of National Defence)*, 1993 NSCA 182.

¹¹ *Director of Public Prosecutions Act* S.C. 2006, c. 9, s. 121.

The Vatican

The Vatican is not party to the *Rome Statute*. However, the crimes against humanity in this Complaint happened on Canadian soil. As such, though the Vatican is not a party to the *Rome Statute*, as the crimes against humanity happened within the borders of a party State, the recent ruling of the Appeals Chamber of the ICC in *SITUATION IN THE ISLAMIC REPUBLIC OF AFGHANISTAN*¹² dictates the ICC has jurisdiction.

With respect to the GOC prosecuting the Vatican along with itself under the *CAHWCA*, the doctrine of sovereign immunity would prevent the GOC from prosecuting the Vatican. As such, unlike the GOC who has waived sovereign immunity via enacting s.3 of the *CAHWCA*, the *CAHWCA* does not apply to the Vatican itself as a named accused, but it does to its agents, employees, and actors.

Article 25 3. (d) of the *Rome Statute* would apply for the continued cover up and suppression of the crimes against humanity, and continuing to do so on and after July 1, 2002, thereby contributing to the commission of the crime against humanity after July 1, 2002. Further, the expansion of the time period for the crime committed via s. 3 of the *CAHWCA* and Article 21. 1. (c) of the *Rome Statute* may apply to the time period before July 1, 2002.

(c) The principle of Complementarity will not be offended

The principle of complementarity governs the exercise of the Prosecutor and ICC's jurisdiction. The *Rome Statute* recognizes that States have the primary responsibility to prosecute crimes against humanity domestically. The principle of complementarity holds:

The ICC may only exercise jurisdiction where national legal systems fail to do so, including where they purport to act but in reality are unwilling or unable to genuinely carry out proceedings. The principle of complementarity is based both on respect for the primary jurisdiction of States and on considerations of efficiency and effectiveness, since States will generally have the best access to evidence and witnesses and the resources to carry out proceedings. Moreover, there are limits on the number of prosecutions the ICC, a single institution, can feasibly conduct.¹³

The two guiding principles to complementarity are partnership and vigilance. Specifically:

Partnership highlights the fact that the relationship with States that are genuinely investigating and prosecuting can and should be a positive, constructive one. The Prosecutor can, acting within the mandate provided by the Statute, encourage the State concerned to initiate national proceedings, help develop cooperative anti-impunity strategies, and possibly provide advice and certain forms of assistance to facilitate national efforts. There may also be situations where the Office of the Prosecutor (OTP) and the State concerned agree that a consensual division of labour is in the best interests of justice; for example, where a conflict-torn State is unable to carry out effective proceedings against persons most responsible.

Vigilance marks the converse principle that, at the same time, the ICC must diligently carry out its responsibilities under the Statute. The Prosecutor must be able to gather information in order to verify that national procedures are carried out genuinely. Cooperative States

¹² *SITUATION IN THE ISLAMIC REPUBLIC OF AFGHANISTAN*, above, note 2.

¹³ *Informal expert paper: The principle of complementarity in practice* [ICC-OTP 2003](#), p. 3.

should generally benefit from a presumption of *bona fides* and baseline levels of scrutiny, but where there are indicia that a national process is not genuine, the Prosecutor must be poised to take follow-up steps, leading if necessary to an exercise of jurisdiction.¹⁴

In a Preliminary Examination by the Prosecutor in Canada, the Prosecutor, unlike many other Member States, has implicit domestic statutory powers. Specifically:

Under s. 16(1) of *CAHWCA* every person who wilfully attempts in any manner to obstruct, pervert or defeat the course of justice of the International Criminal Court is guilty of an indictable offence. At s.16(2) it also makes clear this applies to both existing and proposed proceedings.

Under s.17 of *CAHWCA*, every person who resists or wilfully obstructs an official of the International Criminal Court in the execution of their duty or any person lawfully acting in aid of such an official is guilty of an offence.

Unlike the substantive crime against humanity, which requires consent or the Attorney General to prosecute, s. 16 and s. 17 of *CAHWCA* do not require such consent. In fact, in Canada, the investigation and prosecution of federal criminal offences primarily falls to the Provincial Governments (ie. British Columbia) under their powers at 92(14) of the *Constitution Act*, 1867 regarding the jurisdiction over the administration of justice. As such, if the Prosecutor commences a Preliminary Examination, the law enforcement officials who answer to the Provincial Government, not the GOC, can assist the Prosecutor. This is beneficial in the sense that it is the employees, agents and actors of the GOC who are suspect of the crimes against humanity and covering them up. Further, as the Director of the PPSC is independent of the GOC, including semi-independent of the Attorney General, the PPSC can assist the Prosecutor in their investigation as well. The PPSC, Provincial prosecution services, RCMP and other police services can commence a proceeding regarding charges for violations of s.16 and s.17 of *CAHWCA* without political interference or consent of the Attorney General of Canada. Further, PPSC, Provincial prosecution services, RCMP and other police services would have the ability to file charges against the GOC, its employees, agents, and actors under s. 16 and s.17 of *CAHWCA* if those individuals or the GOC interfere with your investigation. The PPSC, Provincial prosecution services, RCMP and other police services can obtain warrants for records, evidence, and materials from third parties as well should they choose to pursue them at the request of the Prosecutor.

As such, if the Prosecutor seeks to carry out its Preliminary Examination duties under Article 15(2) of the *Rome Statute* to obtain additional information from the GOC, organs of the United Nations, intergovernmental or non-governmental organizations like the Canadian Catholic Church, or other reliable sources that the Prosecutor deems appropriate, including receiving written or oral testimony at the seat of the ICC, interference with that duty, by anyone, including the GOC itself, is a criminal offence in Canada.

It is submitted that the Prosecutor carrying out the duties under Article 15(2) in Canada does not infringe on Canadian sovereignty in any way. Canadian Parliament and the GOC, via the domestic implementation of the *Rome Statute* in *CAHWCA*, specifically chose to create the implicit statutory powers for the Prosecutor in s.16 and s.17 and be bound by them as per s.3. No one, including the GOC, should be the only judge in their own cause. The complete independence the Prosecutor has from the GOC coupled with the domestic legislative recognition of the Prosecutors authority in

¹⁴ Ibid, p. 3-4.

Canada, and the facts at issue, dictate the Prosecutor begin a Preliminary Examination seeking further evidence.

Particularly, under Article 15(2) of the *Rome Statute*, the Prosecutor should request of the GOC, Vatican, and Canadian Catholic Church,

- (1) Any and all records in their respective possession regarding the 215 dead children discovered at or near the Kamloops Residential School.
- (2) Lists of all students and employees that attended and worked at Kamloops Residential School from 1940 to 1978.
- (3) All internal memorandums, records or documents from July 1/2002 to present regarding the 215 dead children, mass grave, and crimes committed at Kamloops Residential School.
- (4) All internal memorandums, records or documents from prior to July 1/2002 regarding the 215 dead children, mass grave, and crimes committed at Kamloops Residential School.
- (5) Any and all records in their respective possession regarding children in potential mass grave sites at or near any residential schools in Canada.
- (6) Lists of all students and employees that attended and worked at residential schools in Canada from 1940 to 1996.
- (7) All internal memorandums, records or documents from July 1/2002 to present regarding the children in potential mass grave sites at or near any residential schools in Canada.
- (8) All internal memorandums, records or documents from prior to July 1/2002 regarding the children in potential mass grave sites at or near any residential schools in Canada.

For the GOC, many of these records would be in the possession of what was the Department of Indian Affairs and is now called Indigenous and Northern Affairs Canada.

By the Prosecutor opening a Preliminary Examination *proprio motu*, it can carry out both the guiding principles of partnership and vigilance. Further, though the discovery of the bodies of the 215 children was recent, the Vatican have known about the issue since at least the TRC report in 2015 done very little. The GOC has known about the issue since at least 2009¹⁵ and likely far earlier, and done very little. It is submitted that the Prosecutor opening a Preliminary Examination *proprio motu* in order to encourage the GOC and Vatican to initiate domestic proceedings, provide advice and certain forms of assistance to facilitate national efforts, and most importantly provide baseline levels of scrutiny over the GOC and Vatican, is in the interest of justice. We respectfully request an expedited response from the Prosecutor to this Complaint.

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¹⁵ https://globalnews.ca/news/7907424/trc-mass-graves-residential-school-federal-funding/?utm_medium=Facebook&utm_source=GlobalNews&fbclid=IwAR0DXOAY7NXlOSv27pMbvNeom2reXingsB_a0TawF9bkoomvBS8k7jpUuJ8

Communication and Referral seeking a Preliminary Examination of the Prosecutor of the International Criminal Court be commenced *proprio motu* pursuant to Article 15 of the *Rome Statute of the International Criminal Court*

Complainants:



Date: June 2, 2021

Brendan M. Miller
Complainants' Primary Contact
Foster LLP



Date: June 2, 2021

Jennifer Shafter, Q.C.
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Date: June 2, 2021

Jonathan Denis, Q.C.
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Date: June 2, 2021

Donna Kennedy-Glans, Q.C.



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Brad Popovic
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Communication and Referral seeking a Preliminary Examination of the Prosecutor of the International Criminal Court be commenced *proprio motu* pursuant to Article 15 of the *Rome Statute of the International Criminal Court*

Complainants:



Date: June 2, 2021

Andrew J. Koeman
Mincher Koeman LLP
Former Crown Prosecutor, Specialized Prosecutions Branch, Alberta



Date: June 2, 2021

Lynsey Mincher
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Date: June 2, 2021

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Date: June 2, 2021

Andrew D. Phypers J.D.
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Date: June 2, 2021

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**Communication and Referral seeking a Preliminary Examination of the
Prosecutor of the International Criminal Court be commenced *proprio motu*
pursuant to Article 15 of the *Rome Statute of the International Criminal
Court***

Complainants:



Darren Mahoney

Date: June 2, 2021

Advocate Law

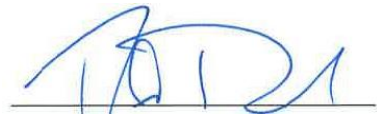
Former Crown Prosecutor, Public Prosecution Services Canada, and Alberta
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Joni-Lynn Ellerton

Date: June 2, 2021

Member of the Law Society of the Yukon



Date: June 2, 2021

Richard Diamond

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Daniel Colborne

Date: June 2, 2021

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Rupert Joshi

Date: June 2, 2021

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**Communication and Referral seeking a Preliminary Examination of the
Prosecutor of the International Criminal Court be commenced *proprio motu*
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Court***

Complainants:

Sarah J. Rauch

Sarah J. Rauch
Rauch Darby & Company

Date: June 2, 2021

Claudia Molina

Claudia Molina
Cabinet Molina Inc.

Date: June 2, 2021



Agnes Huang
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Date: June 2, 2021

Laura-Claire Maher

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Suzanne S. Williams
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**Communication and Referral seeking a Preliminary Examination of the
Prosecutor of the International Criminal Court be commenced *proprio motu*
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Complainants:



Date: June 2, 2021

Stuart Mair

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