



**Rights and Liberties Protection Department (RLPD), Ministry of Justice**

Chaeng Watthana Government Complex,  
Chaengwatthana Road, Lak Si,  
Bangkok

15 March 2019

Dear Sir/Madam,

**Re: Recommendations on draft National Action Plan on Business and Human Rights  
(Dated 14 February 2019)**

We write to your office concerning the draft National Action Plan on Business and Human Rights ('draft NAP'), dated 14 February 2019, scheduled for public consultation between 15 February 2019 and 15 March 2019.

We note that Thailand is among the first countries in the ASEAN region to have begun the elaboration of a National Action Plan ('NAP') and welcome the Thai Government and the Ministry of Justice's efforts and commitment to implement the United Nations Guiding Principles on Business and Human Rights (UNGPs) through the NAP.

We would propose the following recommendations with a view to strengthening the NAP, particularly concerning human rights defenders (HRDs), identified as one of the NAP's key priority issues. We wish to draw your attention to harassment of HRDs through judicial processes, particularly those who have been charged for carrying out their legitimate and important work to raise awareness and highlight concerns regarding human rights in Thailand. In this respect, we would highlight our concerns and recommendations regarding existing legal measures to combat Strategic Litigation against Public Participation (SLAPP).

**Background**

1. SLAPP are lawsuits undertaken with the principal objective of curtailing or deterring public criticism or opposition to certain activities of the entity of those initiating the legal action, including in the human rights area. SLAPP lawsuits against a HRD typically has a "chilling effect" on the exercise of freedom of expression and other human rights and fundamental freedoms which Thailand is bound to protect pursuant to its international legal obligations. These include the *International Covenant on Civil and Political Rights* (ICCPR), a human rights treaty which Thailand has ratified, that requires States that are parties to it to guarantee a range of civil and political rights, including freedom of opinion and expression, including the right to seek, receive and impart information (article 19); freedom of peaceful assembly (article 21); and the right to take part in the conduct of public affairs (article 25).
2. These rights, when exercised by human rights defenders, have been accorded heightened protection in international standards in particular through the UN Declaration on the Right and Responsibility of Individuals, Groups and Organs of Society to Promote and Protect Universally Recognized Human Rights and Fundamental Freedoms (Declaration on Human Rights Defenders), adopted in 1999 by consensus of the General Assembly.
3. In addition, Thailand also has an obligation to ensure that persons are protected from any acts by private persons or entities that would impair the enjoyment of the freedoms

of opinion and expression as set out above.<sup>1</sup> This protective obligation is affirmed by the UNGPs as they relate specifically to business, under the first pillar, obligation to protect.

4. The rights to free expression, assembly and to freedom of information are also guaranteed by the Constitution of the Kingdom of Thailand B.E. 2560 (2017). Section 34 enshrines a person's right to "enjoy the liberty to express opinions, make speeches, write, print, publicize and express by other means;" Section 36 ensures "a person shall enjoy the liberty of communication by any means;" Section 41 ensures "a person and a community shall have the right to... [among other things]...present a petition to a State agency and be informed of the result of its consideration expeditiously;" and Section 44 ensures "a person shall enjoy the liberty to assemble peacefully and without arms."
5. While, in certain limited circumstances, a State may restrict the right to freedom of expression, any such restrictions must be strictly limited in accordance with the ICCPR and Thailand's Constitution and shall only be such as are provided by law and are necessary for respect of the rights or reputations of others, or for the protection of national security or of public order (*ordre public*), public health or morals. Such restrictions must also meet a strict three-part test.<sup>2</sup> Any restrictions must be (i) legitimate, provided by law, which is clear and accessible to everyone<sup>3</sup> and formulated with sufficient precision to enable an individual to regulate his or her conduct;<sup>4</sup> (ii) proven strictly necessary to protect the rights or reputation of others, national security or public order, public health or morals;<sup>5</sup> and (iii) proven to be the least restrictive and proportionate means to achieve the purported aim.<sup>6</sup>

#### *Judicial harassment of HRDs*

6. In April 2017, the UN Human Rights Committee, the supervisory body charged with assessing State compliance with provisions of the ICCPR, expressed concern in its review of Thailand's periodic report, at "criminal proceedings, especially criminal defamation charges, brought against human rights defenders, activists, journalists and other individuals" for merely exercising their fundamental freedoms and recommended that Thailand "should take all measures necessary to guarantee the enjoyment of freedom of opinion and expression in all their forms, in accordance with article 19 of the Covenant."<sup>7</sup>
7. During its official visit to Thailand in April 2018, the U.N. Working Group on Business and Human Rights similarly called on the Thai government to "ensure that defamation cases are not used by businesses as a tool to undermine legitimate rights and freedoms of affected rights holders, civil society organizations and human rights defenders." The Working Group further recommended "enacting anti-SLAPP legislation to ensure that human rights defenders are not subjected to civil liability for their activities."<sup>8</sup>
8. Within Thailand's legal framework, criminal defamation (Articles 326-328 of the Thai Criminal Code), Article 14 of the Computer-Related Crime Act B.E.2550 (2007), Article 116 of the Thai Criminal Code, a sedition-like offence, and the Public Assembly Act B.E.

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<sup>1</sup> UN Human Rights Committee, *General comment no. 34, Article 19, Freedoms of opinion and expression*, 12 September 2011, CCPR/C/GC/34, para. 7, available at: <http://www.refworld.org/docid/4ed34b562.html>.

<sup>2</sup> *Ibid*, especially paras. 21-36; UN Human Rights Council, *Report of the Special Rapporteur on the promotion and protection of the right to freedom of opinion and expression, Frank La Rue*, 4 June 2012, A/HRC/20/17, para. 64 and 81, available at: <http://www.refworld.org/docid/5008134b2.html>.

<sup>3</sup> *Report of the Special Rapporteur*, 2012.

<sup>4</sup> *General Comment No. 34*, para 25.

<sup>5</sup> *Report of the Special Rapporteur*, 2012.

<sup>6</sup> *Ibid*.

<sup>7</sup> UN Human Rights Committee, *Concluding Observations*, CCPR/C/THA/CO/2, 25 April 2017, available at: [http://tbinternet.ohchr.org/\\_layouts/treatybodyexternal/Download.aspx?symbolNo=CCPR%2fC%2fTHA%2fCO%2f2&Lang=en](http://tbinternet.ohchr.org/_layouts/treatybodyexternal/Download.aspx?symbolNo=CCPR%2fC%2fTHA%2fCO%2f2&Lang=en)

<sup>8</sup> United Nations Working Group on Business and Human Rights, *Statement at the end of visit to Thailand by the United Nations Working Group on Business and Human Rights*, 4 April 2018, available at: <https://www.ohchr.org/en/NewsEvents/Pages/DisplayNews.aspx?NewsID=22915&LangID=E>

2558 (2015) have reportedly been wielded against HRDs for bringing to light human rights concerns and information in the interests of the public.<sup>9</sup>

9. We note that the draft NAP has set out several action points aimed at protecting HRDs, including to “push for the review, amendment and repeal of relevant laws, mechanisms and protocols to facilitate protection of HRDs, for example with respect to witness protection laws”; “to determine or review policies, protocols, procedures and mechanisms to protect HRDs, including women HRDs, and ensure for them safe conditions of work, and to provide trainings for law enforcement agencies to ensure in practice these protection measures”; “to provide trainings for law enforcement officers to widen their knowledge of measures to protect human rights, for example with respect to the organization of assemblies, and free expression pertaining to human rights”;<sup>10</sup> “to urge businesses ... to ensure that HRDs will not be sued merely calling for rights of individuals to be protected”;<sup>11</sup> “to promote the use of reconciliation mechanisms at all levels of the justice system”; and “to increase access to justice of HRDs who are the injured persons.”<sup>12</sup>
10. It is our concern however that judicial harassment of HRDs has not been sufficiently addressed by the draft NAP. Even as the draft NAP urges businesses to ensure HRDs are not sued for their legitimate human rights work, at present it does not clearly provide guidance on prevention of the use of legal and judicial procedures to harass and thereby curtail the work of HRDs. In earlier versions of the NAP, including the draft dated 23 August 2018, a commitment had been included to “push for an Anti-SLAPP law”.<sup>13</sup> This provision was, however, removed from the current draft NAP. This removal was justified in the draft NAP on the grounds that the Court of Justice had already introduced legal amendments to prevent SLAPP lawsuits, in particular by enacting Articles 161/1 and 165/2 of the Criminal Procedure Code.<sup>14</sup> The draft NAP also refers to the power of a public prosecutor under Article 21 of the Public Prosecution Organ and Public Prosecutors Act B.E. 2553 (2010) as another measure to prevent SLAPP lawsuits.<sup>15</sup>
11. We are concerned, however, that these laws are inadequate to prevent judicial harassment of HRDs for reasons set out below.

### **Article 161/1 of the Criminal Procedure Code**

12. Article 161/1 of the Criminal Procedure Code was recently passed by the National Legislative Assembly (NLA) on 4 December 2018 during NLA Extraordinary Meeting No. 83/2561. The law has not yet been published in the Government Gazette.<sup>16</sup> Article 161/1 states that:

*"In a case filed by a private complainant, if it appears to the court – or through examination of evidence called at trial – that the complainant has filed the lawsuit in bad faith or distorted facts in order to harass or take undue advantage of a defendant, or to procure any advantage to which the complainant is not rightfully entitled to, the court shall order dismissal of the case, and forbid the complainant to refile such case again.*

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<sup>9</sup> ICJ and TLHR, *Joint Submission to the UN Human Rights Committee in advance of the Committee's examination of Thailand's second periodic report under Article 40 of the Covenant*, 6 February 2017, available at: [https://tbinternet.ohchr.org/Treaties/CCPR/Shared%20Documents/THA/INT\\_CCPR\\_CSS\\_THA\\_26602\\_E.pdf](https://tbinternet.ohchr.org/Treaties/CCPR/Shared%20Documents/THA/INT_CCPR_CSS_THA_26602_E.pdf)

<sup>10</sup> RLPD, *Draft NAP*, 14 February 2019, at 76 and 78

<sup>11</sup> *Ibid*, at 80

<sup>12</sup> *Ibid*, at 82

<sup>13</sup> RLPD, *Draft NAP*, 23 August 2018, at 32

<sup>14</sup> RLPD, *Draft NAP*, 14 February 2019, at 72-73.

<sup>15</sup> *Ibid*, at 73

<sup>16</sup> Available at: [http://web.senate.go.th/bill/bk\\_data/429-3.pdf](http://web.senate.go.th/bill/bk_data/429-3.pdf)

*The filing of a lawsuit in bad faith as stated in paragraph one includes incidents where the complainant intentionally violated a final court's orders or judgments in another case without providing any appropriate reason."*

13. The reasons for introducing Article 161/1 were specified in a proposal for the amendment of the Criminal Procedure Code in a report by Mr. Mahannop Dejvitak and other members of the NLA, in which it was highlighted that: "[I]n many instances, persons exercised their right to sue another in bad faith or distorts the facts in order to harass or take undue advantage of a defendant, or to procure any advantage to which the complainant is not rightfully entitled to, for example, by submitting cases to a distantly located court so that the defendant would face difficulties in travelling to defend themselves at trials, by seeking prosecution of a defendant for an offence with more severe penalties to intimidate defendants and cause them to self-censor or avoid certain work, or by instigating lawsuits, during which the alleged victim will not present themselves at court, causing difficulties for the defence in the preparation of their arguments."<sup>17</sup> The preamble of the draft amendment to the Criminal Procedure Code that was approved by the NLA also highlights that the objective behind the amendment was "to prevent the filing of a lawsuit in bad faith which will violate the rights and freedoms of others".<sup>18</sup> We understand, however, from our discussions with judicial authorities that Article 161/1 is likely only be applied in exceptional circumstances.
14. While we welcome the efforts of the NLA to institute legal protections against SLAPP, we would like to propose that the following concerns be also addressed, towards ensuring broader protection against SLAPP.
15. First, Article 161/1 does not provide a clear definition of "bad faith" and does not clarify that the purpose of the amendment is to protect the free exercise of fundamental freedoms, protected under Thailand's Constitution and Thailand's international legal obligations. It is crucial that "bad faith" is specifically defined and, in particular, includes a clear prohibition on filing of lawsuits to harass or intimidate individuals and entities who are solely exercising their human rights and fundamental freedoms.
16. Secondly, given the qualification "if it appears to the court", Article 161/1 might not allow either party to submit any proof of intention – leaving the case entirely up to judicial discretion. In this respect, we recommend that both parties be expressly afforded the right to make submissions to provide evidence in support of their argument before the court, to guide the court's decision in the matter. Furthermore, while we consider that the general right to appeal or judicially review the court's decision would apply to this question, we recommend that this right to appeal the court's decision be expressly guaranteed under Article 161/1; i.e. that the question be subject to judicial appellate review.
17. Thirdly, SLAPP lawsuits are not limited only to criminal cases filed by a private complainant, – e.g. an injured individual or private entity – but can be launched through civil cases or criminal cases filed by a public prosecutor. Notably, Article 161/1 prevents only private criminal complainants from refileing SLAPP criminal lawsuits, and not public prosecutors. The following cases highlight how Article 161/1 is insufficient to curtail SLAPP lawsuits which are civil suits or criminal suits brought by public prosecutors.
18. In November 2016, it was reported that gold mining company Tungkom Co. Ltd. had brought at least 19 criminal and civil lawsuits over seven years against 33 members of community-based environmental rights group Khon Rak Ban Kerd Group (KRBKG) and other villagers, including a 15-year-old girl, in Loei province, seeking nearly 320 million Thai Baht (US\$9.1 million) in damages for their work to defend environmental rights in

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<sup>17</sup> Ibid, at 72; Mr. Mahannop Dejvitak et al., *Rationales and Principles attached to Draft Amending Criminal Procedure Act*, submitted to the Chair of the NLA, 22 June 2017, available at:

[http://web.senate.go.th/bill/bk\\_data/429-1.pdf](http://web.senate.go.th/bill/bk_data/429-1.pdf)

<sup>18</sup> NLA, *Draft Amending Criminal Procedure Code*, 11 December 2018, available at:

[http://web.senate.go.th/bill/bk\\_data/429-3.pdf](http://web.senate.go.th/bill/bk_data/429-3.pdf)

their region.<sup>19</sup> In January 2018, a public prosecutor in Songkhla province filed criminal lawsuits against 16 persons for alleged violation of the Public Assembly Act for holding a protest against the coal-fired power plant project in Thepha district, Songkhla province.<sup>20</sup> In October 2018, farming company Thammakaset Co. Ltd. filed criminal and civil defamation complaints against Nan Win, a Burmese migrant worker, and Sutharee Wannasiri, a human rights defender and former Human Rights Specialist with non-governmental organization Fortify Rights. These complaints related to a 107-second film published by Fortify Rights that called on Thai authorities to drop criminal defamation charges against 14 migrant workers at a Thammakaset-operated chicken farm and to decriminalize defamation in Thailand. Nan Win had appeared in the film and Sutharee Wannasiri had shared information about the film on social media in her capacity as a Fortify Rights representative.<sup>21</sup>

19. These cases highlight that Article 161/1 would be insufficient to curtail and protect against SLAPP lawsuits, since it would not have applied to most of them, as some were criminal cases filed by public prosecutors, while others were civil cases. Certain laws, including in particular criminal defamation laws, are misused to harass and intimidate individuals, and should be repealed in the first place. The UN Human Rights Committee has clarified that defamation laws must ensure they do not serve, in practice, to contravene the rights to freedom of expression and information protected under the ICCPR. The use of criminal sanctions rather than civil damages also constitutes a disproportionate means of protecting the reputation of others. While civil penalties may in some instances be appropriate to achieve a lawful aim of protection of reputation, the imposition of such penalties must be proportionate and strictly necessary to achieve a legitimate purpose.<sup>22</sup> By contrast, the Human Rights Committee has indicated that criminal penalties will generally be inappropriate for defamation, and that States should consider repealing criminal defamation laws, and that imprisonment can never be a necessary and proportionate sanction for defamation.<sup>23</sup>
20. Finally, paragraph 2 of Article 161/1 may result in the curtailment of an individual's rights to access to justice and a fair trial, in prohibiting complainants who are determined to have intentionally, and without appropriate reason, violated a final court's orders or judgments in another case from filing a lawsuit. An individual's right to access to justice and to file a lawsuit should not be negatively impacted by a decision in another case which has no legal effect or bearing on the case he or she wishes to file. The paragraph is also vague and unclear about what constitute "any appropriate reasons" which can prevent a complainant from filing a lawsuit.

### **Article 165/2 of the Criminal Procedure Code**

21. Article 165/2 of the Criminal Procedure Code was recently published in the Government Gazette and entered into force on 20 February 2019.<sup>24</sup> The law states that:

*"During the preliminary hearing, the defendant may submit to the court a significant fact or law which may bring the court to the conclusion that the case before it lacks merit, and may include in the submission as evidence, persons, documents or materials to substantiate the defendant's claims provided in the submission. In such case, the court may call such persons, documents or materials to provide evidence in its*

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<sup>19</sup> Fortify Rights, *Thailand: Stop Judicial Harassment of Human Rights Defenders*, 9 May 2016, available at: <https://www.fortifyrights.org/publication-20160510.html>; See also ICJ and TLHR, *Joint Submission in advance of the examination of the Kingdom of Thailand's Second Periodic Report under Article 40 of the International Covenant On Civil And Political Rights*, para 59, March 2017, available at: <https://www.ici.org/wp-content/uploads/2017/02/Thailand-ICCPR-Submission-ICJ-TLHR-Advocacy-Non-legal-submissions-2017-ENG.pdf>

<sup>20</sup> Thai PBS, *16 coal-fired power plant protesters prosecuted*, 13 January 2018, available at: <http://englishnews.thaipbs.or.th/16-coal-fired-power-plant-protesters-prosecuted/>

<sup>21</sup> ICJ, *Thailand: Drop defamation complaints against human rights defenders Nan Win and Sutharee Wannasiri*, 3 December 2018, available at: <https://www.ici.org/thailand-drop-defamation-complaints-against-human-rights-defenders-nan-win-and-sutharee-wannasiri/>

<sup>22</sup> *General Comment No. 34*, para. 47

<sup>23</sup> *Ibid*

<sup>24</sup> Available at: [http://www.ratchakitcha.soc.go.th/DATA/PDF/2562/A/020/T\\_0001.PDF](http://www.ratchakitcha.soc.go.th/DATA/PDF/2562/A/020/T_0001.PDF)

*deliberation of the case as necessary and appropriate, and the complainant and the defendant may examine this evidence with the consent of the court."*

22. We welcome the introduction of Article 165/2, which protects rights to access to justice, including the right of the defence to submit and test evidence, as part of the right to a fair trial, protected under ICCPR article 14, at the preliminary hearing stage. This can assist the court in determining where a case lacks merit. This article, in itself, however, does not adequately protect individuals and HRDs against SLAPP, as alluded to by the draft NAP.
23. Article 165/2 applies only to criminal cases filed by a private complainant, and not to civil cases and, where the court thinks fit, criminal cases filed by public prosecutors, which amount to SLAPP. Article 165/2, however, only mandatorily applies to the preliminary hearing stage, which will only be held if the case is a prosecution charge sought by a private individual or entity; such a preliminary hearing is not necessary in cases filed by public prosecutors.<sup>25</sup>

### **Article 21 of the Public Prosecution Organ and Public Prosecutors Act B.E. 2553 (2010)**

24. Article 21 of the Public Prosecution Organ and Public Prosecutors Act B.E. 2553 (2010) states that:

*"Should a public prosecutor find that a criminal prosecution will be of no use to the general public, will affect the national safety or security, or will impair significant interest of the State, he shall refer his opinion to the Attorney-General who may then render an order of non-prosecution."*

25. Noting that SLAPP lawsuits are filed against individuals who are merely exercising their fundamental freedoms, these lawsuits should be determined per se as 'meritless' and be dismissed by public prosecutors at the very inception of any such lawsuit. Prosecutors should be competent to simply exercise their general power to not bring any such lawsuit to court in accordance with Thailand's laws and Thailand's international legal obligations. It, therefore, should not always be necessary that public prosecutors use the abovementioned article to dismiss SLAPP lawsuits.
26. Furthermore, as SLAPP lawsuits can burden defendants with harassment and distress from the moment they are filed, early dismissal or rejection of meritless lawsuits by public prosecutors is necessary. Public prosecutors, as well as inquiry officers, should therefore be encouraged to exercise their ordinary powers as set out under articles 140 to 143 of the Criminal Procedure Code to render a non-prosecution order at the outset to minimize undue and negative effect of SLAPP lawsuits. The draft NAP should also, in this regard, precisely address the crucial roles of public prosecutors and inquiry officers in protecting the fundamental rights of individuals, particularly with respect to judicial harassment through SLAPP.

### **Other relevant laws**

27. In addition, specific laws should be repealed or amended to ensure that the exercise of fundamental freedoms are not effectively criminalized in Thailand, including criminal defamation (Articles 326-328 of the Thai Criminal Code), Article 14 of the Computer-Related Crime Act, Article 116 of the Thai Criminal Code and the Public Assembly Act, which have been used to clamp down on freedom of expression, information and assembly.<sup>26</sup> This should be explicitly addressed in the draft NAP, in particular in the action plan to "push for the review, amendment and repeal of relevant laws,

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<sup>25</sup> Article 162 of the Criminal Procedure Code

<sup>26</sup> For further analysis, please see: ICJ and TLHR, *Joint Submission to the UN Human Rights Committee in advance of the Committee's examination of Thailand's second periodic report under Article 40 of the Covenant*, 6 February 2017, para 16-23, available at: [https://tbinternet.ohchr.org/Treaties/CCPR/Shared%20Documents/THA/INT\\_CCPR\\_CSS\\_THA\\_26602\\_E.pdf](https://tbinternet.ohchr.org/Treaties/CCPR/Shared%20Documents/THA/INT_CCPR_CSS_THA_26602_E.pdf).

mechanisms and protocols to facilitate protection of HRDs, for example with respect to witness protection laws".<sup>27</sup>

## Recommendations

28. In light of above stated concerns, we recommend that the draft NAP include within its action plans, a clear commitment for concrete action with the force of law to protect individuals, and in particular HRDs, from judicial harassment, including through SLAPP lawsuits.
29. We recommend, in particular, that the draft NAP include within its action plans:
  - 29.1 The development of a comprehensive stand-alone law to fully protect workers, HRDs, and other individuals from judicial harassment through SLAPP lawsuits at the outset, in both civil and criminal proceedings, and which apply to cases brought by both public prosecutors and private individuals. Such a law should fully protect the rights to access to justice, the right to a fair trial, including due process guarantees applicable to both complainant and defendant. The law should further explicitly prohibit judicial harassment through SLAPP as a violation of fundamental freedoms protected under Thailand's Constitution and its international human rights obligations, and should provide remedies for persons negatively affected by SLAPP lawsuits; OR
  - 29.2 The amendment of the Civil Procedure Code and the Criminal Procedure Code to allow for the striking out of cases in both civil and criminal cases at the outset, including cases brought by public prosecutors or private individuals, on the basis that they are SLAPP lawsuits, with a clear prohibition of judicial harassment as a violation of fundamental freedoms protected under Thailand's Constitution and its international human rights obligations, and providing remedies for persons negatively affected by SLAPP lawsuits.
30. The draft NAP should further clearly delineate the duties of public prosecutors and inquiry officers to actively protect the fundamental rights of individuals in preventing SLAPP lawsuits, including by affirming that they must exercise their ordinary powers to dismiss cases which fall under the scope of SLAPP lawsuits.
31. We recommend that Article 161/1 of the Criminal Procedure Code only be applied on an exceptional basis, in strict accordance with the principles of necessity and proportionality, and with clarification of the term "*in bad faith or distorts the facts in order to harass or take advantage of a defendant, or aims to procure any advantage to which the complainant is not rightfully entitled to*". This is necessary to provide sufficient precision to enable individuals to regulate their conduct. Furthermore, Article 161/1 should also include a clear pronouncement of the protection of fundamental freedoms in line with Thailand's Constitution and its international human rights obligations. It remains our opinion that Article 161/1 need not be used at all with respect to SLAPP lawsuits if the above noted recommendations are instituted; and in fact, it should only be used to strike out frivolous or vexatious litigation brought before the court.
32. We recommend that Article 161/1 paragraph 2 be repealed or amended to protect and guarantee the rights of individuals to access to justice and fair trial.
33. We recommend the repeal or amendment of laws to ensure that Thailand comply with its international legal obligations, including decriminalization of defamation (Articles 326-328 of the Thai Criminal Code), and amendment of Article 14 of the Computer-Related Crime Act B.E.2550 (2007), Article 116 of the Thai Criminal Code and provisions in the Public Assembly Act B.E. 2558 (2015) which have been used to curtail fundamental rights to free expression, information and assembly.


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<sup>27</sup> RLPD, *Draft NAP*, 14 February 2019, at 76

We remain at your disposal for any further information or clarifications you may require.

Please feel free to contact us at [sanhawan.srisod@icj.org](mailto:sanhawan.srisod@icj.org) or [hrla2008@gmail.com](mailto:hrla2008@gmail.com).

Yours faithfully,



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