



# UNIVERSAL PERIODIC REVIEW SUBMISSION FOR ETHIOPIA

NGO Submission

New York, October 4, 2018

Prepared and submitted by:  
The Human Rights Foundation Center for Law and Democracy

Authors:

Celine Assaf-Boustani, International Legal Associate, HRF  
E-mail: [celine@hrf.org](mailto:celine@hrf.org)

Michelle Gulino, Legal and Policy Fellow, HRF  
E-mail: [michelle.gulino@hrf.org](mailto:michelle.gulino@hrf.org)

Jamila Sulu, Legal and Policy Intern, HRF  
E-mail: [jamila@hrf.org](mailto:jamila@hrf.org)

Human Rights Foundation  
350 Fifth Avenue, Suite 4202  
New York, NY 10118  
[www.hrf.org](http://www.hrf.org)

## ABOUT HRF

1. The Human Rights Foundation (HRF) is a nonpartisan nonprofit organization that promotes and protects human rights globally, with a focus on closed societies. HRF unites people in the common cause of defending human rights and promoting liberal democracy. Our mission is to ensure that freedom is both preserved and promoted around the world.
2. We focus our work on the founding ideals of the human rights movement, those most purely represented in the 1948 Universal Declaration of Human Rights and the 1976 International Covenant on Civil and Political Rights.
3. The Human Rights Foundation Center for Law and Democracy (HRF-CLD) is a program of HRF. HRF-CLD promotes legal scholarship in the areas of comparative constitutional law and international law, with a focus on international human rights law and international democracy law.

## INTRODUCTION

4. This submission was prepared by HRF for the Universal Periodic Review (UPR) of Ethiopia. In this submission, HRF evaluates Ethiopia's implementation of recommendations made in the previous UPR, as it relates to the current human rights situation in the country, which is characterized by systematic, widespread, and gross violations of human rights, such as: arbitrary arrests and detention; torture and extrajudicial killings; the presence of draconian laws which severely curtail the freedom of expression, information, association, and assembly; and violence against women and children, committed by security forces.<sup>i</sup>

## FOLLOW-UP TO THE PREVIOUS REVIEW

5. The UPR of Ethiopia by the Working Group of the United Nations Human Rights Council took place on 6 May 2014. The Human Rights Council considered and adopted the outcome of the country's review at its 26<sup>th</sup> meeting on 19 September 2014.<sup>ii</sup> A total of 252 recommendations were made to Ethiopia, whereby the government accepted 188 recommendations and rejected the remaining 108.<sup>iii</sup>
6. Although Ethiopia accepted recommendations covering a wide range of issues, including those concerning the ratification of several international human rights

instruments, such as the African Union Convention for the Protection and Assistance of Internally Displaced Persons in Africa (Kampala Convention) and the Optional Protocol to the Convention Against Torture,<sup>iv</sup> it has not actually made any progress on the ratification of these instruments.<sup>v</sup> Ethiopia even refused to ratify the Convention on Enforced Disappearance and the Rome Statute of the International Criminal Court, among others.<sup>vi</sup>

7. In the 2014 UPR cycle, U.N. Member States were concerned about Ethiopia's systematic violation of civil and political rights exacerbated by the enforcement of oppressive laws, the conduct of security forces, and the prevailing impunity in the country.
8. Specifically, Member States expressed concerns about the arbitrary arrest and detention of journalists, political opponents, and human rights activists under the 2009 Anti-Terrorism Proclamation (ATP); torture and extrajudicial killings committed by security forces; violations of due process of the law; and restrictions on civil society activities.<sup>vii</sup> The U.N. Member States called upon the government of Ethiopia to honor its commitments made under international human rights law, review the oppressive ATP law, and hold accountable the perpetrators of human rights, including security forces.
9. In its response, the government of Ethiopia noted that some of the recommendations made during the 2014 UPR, particularly those concerning the ATP and the Freedom of the Mass Media and Access to Information Proclamation of 2008, were made without a proper understanding of the state of affairs in Ethiopia. The government stated that the legislations were not used to target political dissidents, but rather, were meant to: ensure the protection of the right to life; preserve peace and security for the Ethiopian people; guarantee and nurture the freedom of expression and of the mass media; hold the mass media accountable for its activities; and build a democratic system.<sup>viii</sup>

## ETHIOPIA'S NATIONAL FRAMEWORK FOR PROTECTING HUMAN RIGHTS

10. The 1995 Constitution of Ethiopia<sup>ix</sup> provides a basic framework for protecting the human rights of its citizens:

**Article 15**

[...]

Every person has the right to life. No person may be deprived of his life except as a punishment for a serious criminal offence determined by law.

**Article 17**

[...]

(2) No person may be subjected to arbitrary arrest, and no person may be detained without a charge or conviction against him.

**Article 18**

(1) Everyone has the right to protection against cruel, inhuman or degrading treatment or punishment.

[...]

**Article 19**

(1) Persons arrested have the right to be informed promptly [...] of the reasons for their arrest and of any charge against them.

[...]

(3) Persons arrested have the right to be brought before a court within 48 hours of their arrest.

[...]

(5) Persons arrested shall not be compelled to make confessions or admissions which could be used in evidence against them. Any evidence obtained under coercion shall not be admissible.

[...]

**Article 29**

[...]

(2) Everyone has the right to freedom of expression without any interference. This right shall include freedom to seek, receive and impart information and ide-

as of all kinds, regardless of frontiers, either orally, in writing [...] or through any media of his choice.

### Article 30

(1) Everyone has the right to assemble and to demonstrate together with others peaceably and unarmed [...].

### Article 31

Every person has the right to freedom of association for any cause or purpose.  
[...]

## ARBITRARY ARREST, DETENTION, AND VIOLATIONS OF DUE PROCESS OF THE LAW

11. Although Ethiopian law prohibits arbitrary arrest and detention,<sup>x</sup> security forces have systematically and arbitrarily arrested and detained without trial, tens of thousands of people.<sup>xi</sup> During the state of emergency, from October 2016 to August 2017, a massive arrest and detention of 22,507 people occurred.<sup>xii</sup> The detainees include members of opposition parties, journalists, teachers, students, and peaceful demonstrators.<sup>xiii</sup> Although the government released about 10,000 of these detainees in early 2018, tens of thousands of people remain in custody, awaiting trial.<sup>xiv</sup>
12. Arbitrary arrests continued in 2018, when more than 1000 men and 20 women from opposition parties, journalists, and bloggers were arrested after a new state of emergency was declared in February 2018.<sup>xv</sup> The alleged reasons for their arrest included: gathering illegally; killing; displaying a banned national flag; and blocking roads during a gathering to honor former detainees.<sup>xvi</sup>
13. In September 2018, security forces arrested 1,200 youths in Addis Ababa who allegedly participated in the 15 September 2018 protests regarding ethnic violence in Burayu, which had killed approximately 60 people.<sup>xvii</sup> The arrested youths

were arbitrarily detained in southwestern Ethiopia's Tolay military camp, for the spurious purpose of "rehabilitation education."<sup>xviii</sup>

14. Numerous detainees have been charged with offences under the 2009 Anti-Terrorism Proclamation (ATP), for baseless links to the opposition groups Oromo Liberation Front and Patriotic Ginbot 7, both of which the government has classified as terrorist organizations.<sup>xix</sup> These detainees are often not provided proper due process of the law; many were detained without charges over varying lengths of time, from a few months to a year. For example, government critic Anania Sorri, was detained from November 2016 to March 2017 "without any charge or due process of law."<sup>xx</sup> Thousands of other inmates are still awaiting their charges at the time of drafting this submission.
15. It is reported that 38 other people were arrested and charged under the ATP for their links to the September 2016 fires at Qilinto prison, where prisoners protested the ban on outside food from inmates' families.<sup>xxi</sup> Masresha Setie, a member of the Ethiopian National Defense Air Force division who defected, and student Abebe Urgessa, were arrested in connection with the Qilinto fire and charged with unsubstantiated terrorism offences. They received prison sentences of 10 and 15 years, respectively.<sup>xxii</sup>
16. By carrying out arbitrary arrests, detentions, and violations of due process of the law, Ethiopia is violating its own domestic law, wherein an arrested individual must be brought before the court within 48 hours,<sup>xxiii</sup> no individual can be detained without a court order,<sup>xxiv</sup> and no proceeding shall ensue without sufficient evidence to support a conviction.<sup>xxv</sup>

## TORTURE AND EXTRAJUDICIAL KILLINGS

17. Torture and extrajudicial killings in Ethiopia are still widespread.<sup>xxvi</sup> Thousands of people have been tortured and indiscriminately killed by security forces since the 2014 UPR of Ethiopia.<sup>xxvii</sup>
18. The most common forms of torture include, *inter alia*: pulling out fingernails; severe beatings with heavy sticks and metal objects; tying together victims' digits, or tying their arms and feet behind their back and laying them facedown; putting chili powder in detainees' eyes; electrocuting and tying male detainees' testicles with heavy weights such as water-filled jerry cans or sand bags and forcing the

men to walk; submerging detainees wholly in water until near-suffocation; and rape of female inmates by security forces.<sup>xxviii</sup>

19. Torture in Ethiopian prisons is used to force confessions.<sup>xxix</sup> For example, Misbah Kedir is among those who have cited the barbaric torture used to force confessions, having collapsed during his own interrogation.<sup>xxx</sup> Kedir was acquitted of his previous charge of corruption but remained in prison for new, unfounded charges under the ATP, connected to the Qilinto prison fire.<sup>xxxi</sup> Another victim, Seyoum Teshome, a university lecturer and government critic, was arrested on charges of “inciting violence” in September 2016.<sup>xxxii</sup> Teshome was severely tortured by over 30 police officers who beat him with wood and plastic sticks, kicked, and fist-punched him in turns, causing him to faint three times.<sup>xxxiii</sup>
20. Concerning extrajudicial killings, security forces at the Irreecha Oromo cultural festival reportedly fired tear gas and rubber bullets into a crowd that prompted a deadly stampede on 2 October 2016.<sup>xxxiv</sup> During the period from November 2015 to February 2016, the Ethiopian Human Rights Council recorded 102 cases of extrajudicial killings,<sup>xxxv</sup> and during the state of emergency from October 2016 to May 2017, defense and security forces killed at least 19 citizens throughout Ethiopia.<sup>xxxvi</sup> Furthermore, security forces killed over 500 people in the Oromia and Amhara regions beginning in November 2015 and July 2016, respectively, and in early 2017, the Liyu Police extrajudicially killed hundreds of Oromos, including infants.<sup>xxxvii</sup>

## FREEDOM OF EXPRESSION AND INFORMATION

21. The government of Ethiopia has arbitrarily arrested numerous bloggers, journalists, and human rights activists, baselessly invoking the ATP to silence them.<sup>xxxviii</sup> For instance, on 24 May 2017, the Federal High Court of Ethiopia convicted Getachew Shiferaw, editor of *Negere Ethiopia*, on charges of “inciting subversion.”<sup>xxxix</sup> Shiferaw was initially charged under Article 7(1) of the ATP and later, with violating Articles 257(a) and (d) of the Ethiopian Penal Code, relating to public provocation and relations or “secret communication with a foreign government, political party, organization or agent.”<sup>xl</sup>

22. In January 2017, two other journalists from Radio Bilal – a faith-based local radio station – Kalid Mohammed Ahmed and Darsema Sori Banqash, were jailed on allegations of terrorism.<sup>xi</sup> In May 2017, Yonatan Tesfaye, a former Blue Party spokesperson, was also sentenced to six years in prison for allegedly inciting terrorism in his Facebook posts,<sup>xlii</sup> under Article 6 of the ATP. At least six journalists fled Ethiopia in 2017, bringing the total number of persecuted journalists who have fled the country since 2010, to 85.<sup>xliii</sup>

## VIOLENCE AGAINST WOMEN AND CHILDREN, COMMITTED BY SECURITY FORCES

23. Rape is a horrific reality in Ethiopia’s Eastern region of Ogaden, where security forces have publicly gang-raped women, including pregnant and breastfeeding women.<sup>xliv</sup> Men are forced at gunpoint to rape their own female relatives, who are thereafter executed or forced into sex slavery.<sup>xlv</sup>

24. Ethiopian security forces have been humiliating and raping female detainees in the presence of male prisoners. At Jijiga’s Central Prison (Jail Ogaden), women are reportedly taken from their cells at night and sent to government officials’ houses in the Jijiga area, to the Liyu police, and other unspecified locations, where they are raped multiple times in some cases.<sup>xlvi</sup> The head of the Liyu police, Abdirahman Labagole, is among those senior officials who has requested women from Jail Ogaden, and Shamaahiye Sheikh Farah, a senior prison official, has also been accused by several former prisoners for raping women.<sup>xlvii</sup> A 40-year old former inmate said she witnessed seven women lined up and publicly raped by prison guards.<sup>xlviii</sup>

25. Women who are raped by these officials subsequently give birth in prison without skilled birth attendants, and in extremely unsanitary conditions.<sup>xlix</sup> Lactating mothers do not receive any additional nutrients.<sup>1</sup>

26. Children not born of rape in jail also often accompany their mothers to jail, and women have cited dozens of children in each cell.<sup>ii</sup> The children, including those born to rape in jail, do not have access to education.<sup>iii</sup>



## RECOMMENDATIONS

27. HRF calls on the Ethiopian government to:

- a) End impunity for crimes committed by security forces and other public officials, by cooperating with an independently-conducted, thorough, and transparent investigation into their use of excessive force, including extrajudicial killings;
- b) Continue the reformist agenda of releasing all political prisoners, journalists, and human rights activists, as well as all individuals who have been arbitrarily detained absent compelling evidence of criminal conduct, in violation of their rights to, *inter alia*, the freedom of expression and association;
- c) Ensure that anyone in detention receives humane treatment in accordance with the Convention Against Torture, which Ethiopia ratified in 1994;
- d) Review and revise the Anti-Terrorism Proclamation of 2009 and other laws which do not conform with standards of international human rights law;
- e) Cooperate with regional and international human rights mechanisms by allowing the special procedure mandate holders to carry out an independent assessment of the human rights situation in Ethiopia, and advise the government accordingly; and
- f) Engage in constructive national dialogue with all ethnic, religious, political, and social groups in Ethiopia in order to generate a sustainable solution to establishing peace within the country.

---

<sup>i</sup> See Mid-term Report on the Implementation of the Recommendations Received by the Federal Democratic Republic of Ethiopia During the Second Cycle of the Universal Periodic Review (UPR), UNREPRESENTED NATIONS AND PEOPLES ORGANIZATION (UNPO) [hereinafter UNPO Mid-term Report] (2017), available at [https://www.upr-info.org/sites/default/files/document/ethiopia/session\\_19\\_-\\_april\\_2014/unpo-mid-term\\_ethiopia\\_2017.pdf](https://www.upr-info.org/sites/default/files/document/ethiopia/session_19_-_april_2014/unpo-mid-term_ethiopia_2017.pdf); see also *Amnesty International Report 2017/2018: The State of the World's Human Rights*, AMNESTY INTERNATIONAL, at 162–163 (2018) [hereinafter *Amnesty International Report 2017/2018*], available at <https://www.amnesty.org/download/Documents/POL1067002018ENGLISH.PDF>; *World Report*

---

2018: *Events of 2017*, HUMAN RIGHTS WATCH, at 207–210 (2017) [hereinafter *World Report 2018*], available at [https://www.hrw.org/sites/default/files/world\\_report\\_download/201801world\\_report\\_web.pdf](https://www.hrw.org/sites/default/files/world_report_download/201801world_report_web.pdf).

<sup>ii</sup> Human Rights Council, *Report of the Human Rights Council on its Twenty-Seventh Session*, ¶ 764, U.N. Doc. A/HRC/27/2 (22 Dec. 2014) [hereinafter *Report of the Human Rights Council*], available at [https://www.ohchr.org/Documents/HRBodies/UPR/A\\_HRC\\_27\\_2\\_E.docx](https://www.ohchr.org/Documents/HRBodies/UPR/A_HRC_27_2_E.docx).

<sup>iii</sup> *Ibid.* ¶ 766.

<sup>iv</sup> Human Rights Council, Working Group of the Twenty-Seventh Session, *Report of the Working Group on the Universal Periodic Review: Ethiopia*, ¶¶ 155.6–155.7, U.N. Doc. A/HRC/27/14 (7 July 2014) [hereinafter *Report of the Working Group on the UPR*], available at [https://www.ohchr.org/EN/HRBodies/HRC/RegularSessions/Session27/Documents/A\\_HRC\\_27\\_14\\_ENG.doc](https://www.ohchr.org/EN/HRBodies/HRC/RegularSessions/Session27/Documents/A_HRC_27_14_ENG.doc).

<sup>v</sup> See “Status of Ratification,” OHCHR, <http://indicators.ohchr.org/>; see also “List of Countries Which Have Signed, Ratified/Accessed to the African Union Convention for the Protection and Assistance of Internally Displaced Persons in Africa (Kampala Convention),” AFRICAN UNION COMMISSION, available at [https://au.int/sites/default/files/treaties/7796-sl-african\\_union\\_convention\\_for\\_the\\_protection\\_and\\_assistance\\_of\\_internally.pdf](https://au.int/sites/default/files/treaties/7796-sl-african_union_convention_for_the_protection_and_assistance_of_internally.pdf).

<sup>vi</sup> See, e.g., Human Rights Council, Working Group of the Twenty-Seventh Session, *Addendum to the Report of the Working Group on the Universal Periodic Review: Ethiopia*, ¶ 1, U.N. Doc. A/HRC/27/14/Add.1 (17 Sept. 2014), available at [https://www.ohchr.org/EN/HRBodies/HRC/RegularSessions/Session27/Documents/A-HRC-27-14-Add1\\_en.doc](https://www.ohchr.org/EN/HRBodies/HRC/RegularSessions/Session27/Documents/A-HRC-27-14-Add1_en.doc); “Rome Statute of the International Criminal Court,” UNITED NATIONS TREATY COLLECTION (Oct. 2018), [https://treaties.un.org/pages/ViewDetails.aspx?src=IND&mtdsg\\_no=XVIII-10&chapter=18&lang=en](https://treaties.un.org/pages/ViewDetails.aspx?src=IND&mtdsg_no=XVIII-10&chapter=18&lang=en).

<sup>vii</sup> See, e.g., *Report of the Working Group on the UPR*, *supra* note iv, ¶¶ 34, 43, 77, 103, 107, 132, 133, 140, 148.

<sup>viii</sup> *Report of the Human Rights Council*, *supra* note ii, ¶¶ 770, 774, 776.

<sup>ix</sup> CONSTITUTION (1995) (Ethiopia), available at <http://www.wipo.int/edocs/lexdocs/laws/en/et/et007en.pdf>.

<sup>x</sup> *Ibid.* art. 17.

<sup>xi</sup> 142<sup>nd</sup> *Special Report: Human Rights Violations Committed During the State of Emergency in Ethiopia*, HUMAN RIGHTS COUNCIL (HRCO) OF ETHIOPIA, at 8, 11 (28 May 2017) [hereinafter *HRCO 142<sup>nd</sup> Special Report*], available at <https://ehrc.org/wp-content/uploads/2017/07/HRCO-142nd-Special-Report-English-Executive-summary-2.pdf>.

<sup>xii</sup> *Ibid.* 8–10.

<sup>xiii</sup> See, *ibid.*

<sup>xiv</sup> *Amnesty International Report 2017/2018*, *supra* note i, at 162.

<sup>xv</sup> Abdur Rahman Alfa Shaban, *Ethiopia’s Feb. 16 State of Emergency: Over 1,100 People Detained*, AFRICA NEWS (1 Apr. 2018), <http://www.africanews.com/2018/04/01/ethiopia-s-feb-16-state-of-emergency-over-1100-people-detained/>.

<sup>xvi</sup> *Ibid.*

<sup>xvii</sup> *Ethiopia: Mass Arbitrary Arrests and Detentions of Youth Threaten a New Era of Human Rights Gains*, AMNESTY INTERNATIONAL (24 Sept. 2018) [hereinafter *Ethiopia: Mass Arbitrary Arrests*], <https://www.amnesty.org/en/latest/news/2018/09/ethiopia-mass-arbitrary-arrests-and-detentions-of-youth-threaten-a-new-era-of-human-rights-gains/>; 58 Killed in Ethiopia Ethnic Violence, DAILY NATION, (20 Sept. 2018) [hereinafter *Ethiopia: Mass Arbitrary Arrests*], <https://www.nation.co.ke/news/africa/58-dead-in-Ethiopia-ethnic-violence/1066-4768524-b5oayl/index.html>.

<sup>xviii</sup> *Ethiopia: Mass Arbitrary Arrests*, *supra* note xvii.

<sup>xix</sup> *Ailing Civic Space in an Authoritarian State: The State of Human Rights Defenders and Cost of Dissent in Ethiopia*, THE ASSOCIATION FOR HUMAN RIGHTS IN ETHIOPIA, at 26 (Jan. 2018) [hereinafter *Ailing Civic Space in an Authoritarian State*], [https://ahrethio.org/wp-content/uploads/2018/01/AilingCivicSpace\\_large-1.pdf](https://ahrethio.org/wp-content/uploads/2018/01/AilingCivicSpace_large-1.pdf).

- 
- xx Ibid. 31.
- xxi Befeqadu Z. Hailu, *The Case of Qilinto Fire in the Past Year, My Testimony*, ETHIOPIA HUMAN RIGHTS PROJECT (4 Sept. 2017), <http://ehrp.org/the-case-of-qilinto-fire-in-the-past-year-my-testimony/>.
- xxii Ibid.
- xxiii Criminal Procedure Code of Ethiopia (1961), art. 29.
- xxiv Ibid. art. 49.
- xxv Ibid. art. 42.
- xxvi *Report of the Working Group on the UPR*, *supra* note iv, ¶¶ 158.29, 158.30.
- xxvii *See, e.g., World Report 2018*, *supra* note i, at 207–208, 210; *Country Summary: Ethiopia*, HUMAN RIGHTS WATCH, at 1 (2017), available at [https://www.hrw.org/sites/default/files/ethiopia\\_1.pdf](https://www.hrw.org/sites/default/files/ethiopia_1.pdf); “Such a Brutal Crackdown”: Killings and Arrests in Response to Ethiopia’s Oromo Protests, HUMAN RIGHTS WATCH (15 June 2016), <https://www.hrw.org/report/2016/06/15/such-brutal-crackdown/killings-and-arrests-response-ethiopias-oromo-protests>; *Amnesty International Report 2017/2018*, *supra* note i, at 163; *Despite Nationwide State of Emergency, Several Border Incursions Leave More Than 100 Dead in East And South East Ethiopia*, ADDIS STANDARD (3 Mar. 2017), <http://addisstandard.com/news-despite-nationwide-state-emergency-several-border-incursions-leave-100-dead-east-south-east-ethiopia/>.
- xxviii *E.g., Ailing Civic Space in an Authoritarian State*, *supra* note ix; “We Are Like the Dead”: Torture and other Human Rights Abuses in Jail Ogaden, Somali Regional State, Ethiopia, HUMAN RIGHTS WATCH, at 31, 33–34, 36–37, 40 (2018) [hereinafter “We Are Like the Dead”], available at [https://www.hrw.org/sites/default/files/report\\_pdf/ethiopia0718\\_web.pdf](https://www.hrw.org/sites/default/files/report_pdf/ethiopia0718_web.pdf); Hailu, *supra* note xxi.
- xxix Ibid.
- xxx Hailu, *supra* note xxi.
- xxxi Ibid.
- xxxii *Ailing Civic Space in an Authoritarian State*, *supra* note ix, at 31.
- xxxiii Ibid.
- xxxiv Ibid. 29.
- xxxv Ibid. 28.
- xxxvi HRCO 142nd Special Report, *supra* note xi, at 6–7.
- xxxvii *See supra* note xxvii.
- xxxviii *See* UNPO Mid-term Report, *supra* note i, at 3,8.
- xxxix UNPO Mid-term Report, *supra* note i, at 4–5; *Amnesty International Report 2017/2018*, *supra* note i, at 163.
- xl Mahlet Fasil, *Ethiopia Editor-in-Chief Sentenced for a Year-and-Half in Prison Time He Already Served*, ADDIS STANDARD (26 May 2018), <http://addisstandard.com/news-ethiopia-editor-in-chief-sentenced-for-a-year-and-half-in-prison-time-he-already-served/>.
- xli Ibid.
- xlii *Ethiopia Court Found Former Senior Opposition Figure Yonatan Tesfaye Guilty of Terrorism Charges*, (16 May 2017), <https://ecadforum.com/2017/05/16/ethiopia-court-found-opposition-figure-yonatan-tesfaye-guilty-of-terrorism-charges/>; *Amnesty International Report 2017/2018*, *supra* note i, at 163.
- xliii *World Report 2018*, *supra* note i, at 208.
- xliv *Shocking Sexual Violence Against Women in Ogaden*, WOMEN’S INTERNATIONAL LEAGUE FOR PEACE AND FREEDOM, <https://www.peacewomen.org/content/shocking-sexual-violence-against-women-ogaden>.
- xlvi Ibid.
- xlv “We Are Like the Dead,” *supra* note xxviii, at 36–37.
- xlvii Ibid. 37–38.
- xlviii Ibid. 38.
- xlvi Ibid. 56.

---

<sup>1</sup> Ibid. 57.

<sup>ii</sup> Ibid.

<sup>iii</sup> Ibid.