

I. EXECUTIVE SUMMARY

1. The Togolese Government frequently violates the fundamental legal safeguards of individuals participating in peaceful public demonstrations in Togo. The Government engages in arbitrary arrest and detention. Persons involved in demonstrations called for by the opposition parties have been subjected to excessive use of force, amounting to torture, and often resulting in death.
2. The Togolese Government uses the threat of detention to discourage persons from exercising their rights to peaceful assembly, opinion, and expression. The legal system and policies in Togo fail to provide individuals with adequate protection from politically motivated violence.
3. Members of the Togolese diaspora living in Minnesota, USA have participated in gathering information for this submission. Human rights organizations in Togo received firsthand information directly, as well as through media and other reports. The Ligue Togolaise des Droits de L'Homme (LTDH), a Togolese human rights organization affiliated with the International Federation for Human Rights, provided documentation of human rights abuses occurring during the period from August 1, 2018, to April 13, 2019.¹ The Regroupement des Jeunes Africains pour la Démocratie et le Développement (REJADD) and the Réseau Africain pour les Initiatives de Droits de l'Homme et de Solidarité (RAIDHS) also provided information on repression of peaceful marches occurring between August 19, 2017 and January 20, 2018.² Both reports are included as appendices to this submission.

II. BACKGROUND AND FRAMEWORK

A. 2016 Universal Periodic Review of Togo

4. During its second-cycle UPR in 2016, Togo received thirty-two recommendations relating to torture, excessive use of force by law enforcement, detention conditions, fair trial and administration of justice, and freedom of expression and opinion and the right to peaceful assembly. Togo accepted all of these recommendations except for three recommendations on freedom of expression and opinion.

1. Torture

Status of Implementation: Accepted, Partially Implemented

5. Togo received seven recommendations related to torture.¹ It accepted all seven recommendations, including a recommendation to amend the legal definition of torture and to carry out impartial and effective investigations into allegations of torture by security forces².

¹ Ligue Togolaise des Droits de L'homme, *Togo: La Terreur contre le Peuple. 31 juillet 2018-27 avril 2019*, (May 22, 2019), <http://societecivilemedia.com/togo-terreur-contre-peuple-laccablant-rapport-de-ltdh/> (accessed June 13, 2019). (hereinafter referred to as « *La Terreur contre le Peuple* »).

² Regroupement des Jeunes Africains pour la Démocratie et le Développement and Réseau Africain pour les Initiatives de Droits de l'Homme et de Solidarité, *Rapport Préliminaire Togo: Plus de 100 morts dans la repression des marches pacifiques du 19 août 2017 au 20 janvier 2018*, (January 31, 2018), <http://societecivilemedia.com/3999-2/> (accessed June 13, 2019). (hereinafter referred to as “*Plus de 100 morts*”).

2. *Excessive use of force*

Status of Implementation: Accepted, Not Implemented

6. Togo received three recommendations related to excessive use of force.³ It accepted all three recommendations, including one recommendation to set up accountability mechanisms to address allegations of excessive use of force.⁴

3. *Detention Conditions*

Status of Implementation: Accepted, Not Implemented

7. Togo received ten recommendations related to detention conditions.⁵ It accepted all ten recommendations, including one recommendation to address overcrowding.⁶

4. *Fair trial and administration of justice*

Status of Implementation: Accepted, Not Implemented

8. Togo received three recommendations related to fair trial and administration of justice.⁷ It accepted all three recommendations, including one recommendation to allow women human rights defenders to carry out their work.⁸

5. *Freedom of expression and opinion and right to peaceful assembly*

Status of Implementation: Partially Accepted, Not Implemented

9. Togo received nine recommendations related to freedom of expression and opinion and the right to peaceful assembly.⁹ It accepted six recommendations and noted three recommendations, including recommendations to amend the Penal Code.¹⁰

B. Domestic Legal Framework

10. Article 15 of the Togolese Constitution prohibits arbitrary arrest or detention.¹¹ Article 16 preserves the right of persons in detention to treatment that does not threaten their dignity, mental, or physical health.¹² Further, Togo's Constitution expressly prohibits torture and other forms of cruel, inhuman or degrading treatment. Article 21 states that no one shall be subject to torture and that no person who commits torture will escape punishment, including State actors.¹³ Article 25 of the Constitution also preserves the freedom of expression and opinion of all people.¹⁴

11. Togo has not amended its Criminal Code since 2015.¹⁵ In its National Report, Togo described several measures it has taken to address the issues in this report. For example, the government highlighted a new definition of torture in the Criminal Code and the introduction of training workshops for police officers and prison officials.¹⁶ Notably, Human Rights Committee members pointed out that the definition of torture fails to include torture perpetrated by State actors.¹⁷

12. Togo has ratified the Convention Against Torture, the International Covenant on Civil and Political Rights, and the Convention on Economic, Social, and Cultural Rights.¹⁸

III. IMPLEMENTATION OF INTERNATIONAL HUMAN RIGHTS OBLIGATIONS

Right or area 12.3. Extrajudicial, summary or arbitrary executions

13. **Law enforcement and the military killed or gravely wounded many participants in peaceful demonstrations.** For example, security agents severely beat Mr. Zinedine ALI-ZERA during a demonstration organized by the opposition Parti National Panafricain (PNP) in Bafilo on April 13, 2019. Mr. ALI-ZERA died before he could be taken to the hospital.¹⁹ On December 8, 2018, while dispersing demonstrators in Togblékopé, law enforcement officers killed Moufidou IDRISOU, a 12-year-old child, with a bullet to the head when he took refuge from the tear gas; they also killed Lawa TCHAKONDO a/k/a Gado, with a bullet to his back as he fled.²⁰ Other instances of excessive use of force did not result in death but nonetheless caused grave physical injury. The LTDH reports that men in military uniforms beat PNP activists at a meeting in Anié on February 14, 2019, used tear gas, and shot a 43-year-old man in the hand.²¹ Numerous other demonstrators have been subjected to indiscriminate beatings and kickings.²² A report by The Regroupement des Jeunes Africains pour la Democratie et le Developpement (REJADD) and the Reseau Africain pour les Initiatives de Droits de l'Homme et Solidarite (RAIDHS) identified 100 deaths resulting from excessive use of force by military, police, and other security forces during the marches.
14. **The military killed many peaceful protestors as a result of an excessive use of force.** Examples cited in the report include the following individual victims. On August 19, 2017, the first day of the marches called by the PNP, the military shot and killed a student named Bastou Ouro-Kefia and a taxi driver named Mamadou Afissou Sibabi in Sokodé.²³ On September 20, 2017, the military shot and killed 9-year-old Yacoubou Abdoulaye in Mango. On October 18, 2017, the military shot and killed 13-year old Kokou Joseph Zoumekey, or “Jojo” in Lomé.²⁴ Other firearm-related deaths occurred as complications of bullet injuries inflicted during the marches, for example 16-year old Rachad Maman Agrigna, who was wounded in Bafilo and died in Sokodé on September 22, 2017.²⁵ In Mango on September 20, 2017, soldiers chasing Séidou N'tchirifou Bawa and Yaya Samari pushed them into the Oti River where they drowned.²⁶ In Sokodé on October 21, 2017, soldiers armed with clubs beat Moutaka Akondo Naboudja. He later died from his wounds.²⁷ High school teacher N'Tchomla died as a result of inhaling large amounts of toxic tear gas on October 21, 2017, at Sokodé.²⁸

Right or area 12.5. Prohibition of torture and cruel, inhuman or degrading treatment

15. **Law enforcement routinely tortured individuals arrested for participating in peaceful demonstrations against the Government.** The Ligue Togolaise des Droits de L'Homme (LTDH), a Togolese human rights organization affiliated with the International Federation for Human Rights, reports that during the period from August 1, 2018, to April 13, 2019, the repression of peaceful public demonstrations in favor of constitutional and institutional reforms included many instances of excessive use of force by law enforcement officers.²⁹ LTDH has documented numerous victims who display scarring and traces of wounds from repeated beatings with batons or cords.³⁰
16. Based on information provided by the LTDH report, persons participating in the demonstrations have been subjected to detentions that constituted torture sessions. Prison

guards whipped and beat detainees with clubs or batons.³¹ After arresting a victim detained in Koumondè, police beat him the point of losing consciousness, then held him in police custody for three days during which they subjected him to further physical abuse.³² Another recounts being beaten in a field, then taken to Bafilo and Kara police stations where he experienced further physical abuse.³³

Right or area 12.6. Conditions of detention

17. Conditions of detention in Togo are dangerously overcrowded and unsanitary, arising to the level of inhumane or degrading treatment. The prisons in Togo were already overpopulated and ripe for the transmission of disease prior to the rise in political detainees.³⁴ Mr. Foly SATCHIVI, until recently detained in the Lomé prison, was denied medical care for a chronic ulcer and respiratory problems while he was in prison.³⁵ Despite the opening of the civil prison in Kpalimé in September 2016, the LDTH reports that the prison of Lomé continues to be grossly overcrowded: 1887 persons are held in a space intended for 666.³⁶

Right or area 13.3. Arbitrary arrest and detention

18. **The Togolese Government arbitrarily arrests potential demonstrators to reduce the number of demonstrators and to deter others from participating.** Many participants in the opposition PNP demonstrations have been detained in Togolese prisons.³⁷ Security forces have also arbitrarily imposed detentions, before the demonstrations, to dissuade people from participating.³⁸ On the nights of January 18 and 19 of 2017, just before planned opposition demonstrations on January 20, police conducted a raid in the periphery of Lomé, and took many people in the third arrondissement into custody, for no legitimate reason and without charges.³⁹ They were released as soon as human rights organizations sounded the alarm, and it appears that their arrest was merely for the purpose of reducing the number of demonstrators.⁴⁰ Later, the LTDH documents a victim who was denounced as someone who called for demonstrations; without proof, he was condemned for destruction of property, even though he had never left his house.⁴¹ Another victim explains that the ruling political party tries to arrest people that are able to mobilize the youth for the opposition; they came to see him just before the elections, to encourage young expatriates to return to the country, so they could be arrested.⁴²
19. After the recent February 2020 elections, the government arbitrarily arrested several individuals for contesting the election results and denouncing reprisals against government opponents. Security forces arrested one individual who claimed the opposition party (DMK) candidate won the election. They also arrested Brigitte Abjamagbo, general coordinator of DMK. Further, security forces arrested the former Minister of Communication and Deputy Djimon Ore for expressing their negative opinions about the Togolese government.⁴³
20. In 2019 and 2020, the government also arbitrarily arrested several people affiliated with the PNP. On April 13, 2019, security forces arrested three security guards at the house of the president of the PNP. On January 25, 2020, security forces arrested and detained the general secretary of the PNP. Further, on June 13, 2020, security forces arrested Mr. Kpindeleze Tchamedji ALILOU, a member of the PNP prefectural office. He has not been seen since.

Right or area 14.3. Freedom of opinion and expression

21. The Togolese Government routinely violates the freedom of opinion and expression of political opponents. See sections on the right to peaceful assembly, arbitrary arrest and detention, and human rights defenders.
22. Police interrogated and threatened several members of the political opposition party leading up to the February 2020 elections. The DMK candidate fled the country due to death threats and violence against his wife and children by security forces. The founder of the DMK party has also fled the country due to threats to his life.

Right or area 14.4. Right to peaceful assembly

23. REJADD and RAIDHS prepared a report on repression of peaceful marches occurring between August 19, 2017 and January 20, 2018.⁴⁴ The REJADD-RAIDHS report also details numerous cases of people wounded during demonstrations by bullets, by rubber bullets, and by beatings.⁴⁵
24. The government has interfered with the work of the PNP through violence and harassment. In 2017, military burned down the headquarters of the PNP. In 2019, security forces interrupted a weekly PNP meeting. They used teargas to disperse the meeting and beat the PNP activists attending the meeting.

Right or area 15.1. Administration of justice & fair trial

25. The LTDH report identifies significant failures of the judicial system to preserve the rights of detainees under Togolese law.⁴⁶ One individual was arrested by soldiers in Koumondè and accused without proof of having participated in a demonstration. The soldiers beat the victim to the point of losing consciousness, then held him in police custody for three days, where he was subjected to further physical abuse.⁴⁷ Three days after being transferred to prison, this victim was judged and condemned to eighteen months of prison, still without any proof of participation in the demonstration.⁴⁸
26. Law enforcement does not appropriately employ “procès-verbal” for detainees in violation of their rights. The “procès-verbal” written for each arrested person is designed to establish the facts on which a charge is based. Judges are not on site to evaluate the facts themselves and rely on the procès-verbal.⁴⁹ In practice, arrested persons are frequently forced to sign them, often after interrogations and torture. For example, there are reports of individuals being taken to the Bafilo and Kara police stations and subjected to serious physical abuse before being condemned by the judge to six months of prison.⁵⁰ Soldiers came into the home of victims T. and Y., who were arrested and beaten.⁵¹ T. and Y. reported that they signed the “procès-verbal” because they had no choice.⁵²
27. Judges do not consistently adhere to due process or provide victims with legal representation. Victims and human rights organizations report that everything depends on the individual judge presiding, as some will release the detainee immediately.⁵³ Others refuse to allow the detainee a lawyer.⁵⁴ Without rights to a properly redacted procès-verbal and a lawyer, victims cannot defend themselves, much less bring the State actors who have beaten and unlawfully detained them to justice.

Right or area 16. Right to an effective remedy, impunity

28. The REJADD-RAIDHS traces a long history of impunity for security forces and governmental authorities in Togo and argues that the repression of political demonstrations during the period the report analyzes is a continuation of that impunity.⁵⁵ The government detained the President of REJADD for one year after he publicized acts

of excessive force perpetrated by governmental security forces. Rather than investigating the perpetrators, the government detained a prominent human rights activist.

Right or area 36. Human rights defenders

29. **Human rights activists in Togo have faced reprisals for speaking out about and reporting on human rights violations.** Assiba Johnson, the President of REJADD, was imprisoned on April 4, 2018, after and because of the release of the REJADD-RAIDHS report.⁵⁶ He was condemned for propagating false news and insulting the authorities, and held in Lomé prison until April 5, 2019.⁵⁷
30. In Bè-Gakpoto, Lomé, police arrested Foly Satchivi, the leader of the Togolese human rights movement “En Aucun Cas,” just before a press conference he had organized for the discussion of the socio-political climate in Togo.⁵⁸ He was forcefully taken to the Lomé prison, charged with rebellion, incitement to commit crimes and misdemeanors, and disruption of public order in connection with the press conference.⁵⁹ On January 18, 2019, Mr. Satchivi was sentenced to three years of prison, one year suspended, for the three charges.⁶⁰ On October 10, 2019, the Lomé Court of Appeal reversed the January 18, 2019, decision partially, but found Mr. Satchivi guilty of the crime of “glorification of crimes and offenses.”⁶¹ Mr. Satchivi was only released on October 16, 2019, because President Faure Essozimna Gnassingbé issued him a presidential pardon.⁶²
31. One client of The Advocates experienced harassment and threats from the government due to his role as a political activist with the PNP. Defense and security agents, along with other masked individuals, came to his home around 2am while he was away, threatening his wife and children. He ultimately fled the country due to these threats.⁶³

IV. RECOMMENDATIONS

32. This stakeholder report suggests the following recommendations for the Government of Togo:
 - Investigate and prosecute the torture and ill-treatment committed by State actors during the demonstrations organized by the PNP and DMK.
 - Release all detainees arrested in connection with peaceful protests and the leaders of PNP and DMK, including Kpatcha Gnassingbé.
 - Facilitate the return of all political exiles since 2005 without exception and guarantee their security.
 - Establish and use an independent mechanism for investigating complaints of torture or ill-treatment at the hands of members of police or security forces.
 - Train judges, lawyers and prosecutors on international standards related to torture and ill-treatment.

- Take immediate action to cease overcrowding, including commuting sentences and releasing persons in pretrial detention without charges.
- Ensure detainees can have the lawfulness of their detention timely adjudicated.
- Ensure adequate hygiene and access to medical treatment for detained persons.
- End the practice of using preemptive arrest and detention to deter freedom of opinion, expression and assembly, including participation in opposition demonstrations.
- Train all judicial officers on proper administration of the law protecting freedom of assembly and freedom of expression and opinion and on the role of human rights defenders.
- Empower grassroots communities to engage in promotion and protection of their human rights, consistent with international human rights standards and referencing local customs such as traditional conflict management roles for local authorities and community leaders.
- Integrate human rights education into all levels of formal education.

¹ Human Rights Council, *Report of the Working Group on the Universal Periodic Review: Togo*, (December 30, 2016), U.N. Doc. A/HRC/34/4. ¶128.21 Institute a national action plan on the prevention of torture and allocate sufficient resources for its implementation (Serbia); ¶128.67 Bring its legal definition of torture into line with the Convention against Torture and Other, Cruel, Inhuman or Degrading Treatment or Punishment (Australia); ¶128.69 Align its Penal Code with international norms with a view to integrating judicial guarantees against torture, such as the right to a lawyer in all phases of a criminal procedure, including in police detention (Serbia); ¶129.5 Domestic the Convention against Torture and Other Cruel, Inhuman or Degrading Treatment or Punishment (Kenya); ¶129.19 Promulgate and implement as soon as possible the law amending the definition of torture and ensure that it is used to investigate complaints of torture and ill-treatment (Mexico); ¶128.83 Ensure that allegations of arbitrary arrest, detention and torture are investigated promptly and thoroughly with suspected perpetrators brought to justice (United Kingdom of Great Britain and Northern Ireland). ¶128.84 Carry out immediate, impartial and exhaustive investigations into all allegations of torture, ill-treatment and other human rights violations, in particular in detention centres, as recommended previously, and prosecute those responsible (Netherlands). Also available online at <https://documents-dds-ny.un.org/doc/UNDOC/GEN/G16/444/22/PDF/G1644422.pdf?OpenElement>.

² Human Rights Council, *Report of the Working Group on the Universal Periodic Review: Togo*, (March 1, 2017), U.N. Doc. A/HRC/34/4/Add.1. Also available online at <https://documents-dds-ny.un.org/doc/UNDOC/GEN/G17/049/28/PDF/G1704928.pdf?OpenElement>.

³ Human Rights Council, *Report of the Working Group on the Universal Periodic Review: Togo*, (December 30, 2016), U.N. Doc. A/HRC/34/4. ¶128.68 Address the arbitrary and excessive use of force by law enforcement agencies, in particular the military, by providing effective human rights-sensitive training and additional resources, and setting up accountability mechanisms (Netherlands); ¶128.97 Ensure the right to unrestricted peaceful assembly, avoid arbitrary detention and the excessive use of force during those assemblies (Uruguay); ¶128.82 Provide prompt, thorough and impartial investigations into all allegations of excessive use of force by the armed forces and submit to a fair trial anyone suspected of being responsible (Belgium). Also available online at <https://documents-dds-ny.un.org/doc/UNDOC/GEN/G16/444/22/PDF/G1644422.pdf?OpenElement>.

⁴ Human Rights Council, *Report of the Working Group on the Universal Periodic Review: Togo*, (March 1, 2017), U.N. Doc. A/HRC/34/4/Add.1. Also available online at <https://documents-dds-ny.un.org/doc/UNDOC/GEN/G17/049/28/PDF/G1704928.pdf?OpenElement>.

⁵ Human Rights Council, *Report of the Working Group on the Universal Periodic Review: Togo*, (December 30, 2016), U.N. Doc. A/HRC/34/4. ¶128.65 Separate children in conflict with the law from adults in police and detention facilities and place them in a child-sensitive environment (Zambia) ¶128.70 Address the growing problem

of pretrial detentions and prison conditions (United States of America) ¶128.72 Continue to take steps to improve conditions in prison settings and make them consistent with international standards (Angola) ¶128.73 Ensure that decent sanitary conditions are provided to detainees (Djibouti) ¶128.74 Improve prison conditions in all detention centres by developing and implementing a strategy to end the current overcrowding in prisons, as accepted in the 2011 review by, inter alia, restricting the use of pretrial detention, developing alternative forms of punishment, as well as ensuring access to sufficient food and drinkable water, adequate sanitary facilities and medical treatment (Germany) ¶128.75 Improve detention conditions in conformity with the United Nations Standard Minimum Rules for the Treatment of Prisoners and the United Nations Rules for the Treatment of Women Prisoners and Non-custodial Measures for Women Offenders (Switzerland) ¶128.76 Take verifiable measures to improve prison conditions (Spain) ¶128.77 Step up efforts for the improvement of the justice as well as the penitentiary system (Greece) ¶128.78 Develop a strategy to reduce prison overcrowding and improve conditions in line with the United Nations Standard Minimum Rules for the Treatment of Prisoners (Kenya) ¶128.92 Pursue reforming the judicial system to strengthen its effectiveness, particularly by improving access to justice and detention conditions (France). Also available online at <https://documents-dds-ny.un.org/doc/UNDOC/GEN/G16/444/22/PDF/G1644422.pdf?OpenElement>.

⁶ Human Rights Council, *Report of the Working Group on the Universal Periodic Review: Togo*, (March 1, 2017), U.N. Doc. A/HRC/34/4/Add.1. Also available online at <https://documents-dds-ny.un.org/doc/UNDOC/GEN/G17/049/28/PDF/G1704928.pdf?OpenElement>.

⁷ Human Rights Council, *Report of the Working Group on the Universal Periodic Review: Togo*, (December 30, 2016), U.N. Doc. A/HRC/34/4. ¶128.71 Facilitate the adoption of the new Code of Criminal Procedure that includes the notification of charges, the right to be assisted by counsel, compulsory medical examination and notification of family members, with a view to strengthening the rights of those in police custody (Republic of Korea) ¶128.85 Improve access to justice for women through legal aid and ensure that women human rights defenders can work safely and are not hindered in their activities (Liechtenstein) ¶128.96 Strengthen the rule of law by depoliticizing the judiciary and law enforcement and strengthening investigations into corruption and human rights violations and abuses (United States of America). Also available online at <https://documents-dds-ny.un.org/doc/UNDOC/GEN/G16/444/22/PDF/G1644422.pdf?OpenElement>.

⁸ Human Rights Council, *Report of the Working Group on the Universal Periodic Review: Togo*, (March 1, 2017), U.N. Doc. A/HRC/34/4/Add.1. Also available online at <https://documents-dds-ny.un.org/doc/UNDOC/GEN/G17/049/28/PDF/G1704928.pdf?OpenElement>.

⁹ Human Rights Council, *Report of the Working Group on the Universal Periodic Review: Togo*, (December 30, 2016), U.N. Doc. A/HRC/34/4. ¶128.98 Ensure the protection of freedom of expression and of assembly in law and in practice, especially with regard to political participation and the safety of journalists (Brazil) ¶129.22 Take steps to protect freedom of expression and opinion, as provided for in the International Covenant on Civil and Political Rights (Australia) ¶129.23 Promote the laws on freedom of the press and of expression (Lebanon) ¶129.25 Reform the laws that hamper the exercise of freedom of expression to ensure that they are in line with international human rights norms (Uruguay). Also available online at <https://documents-dds-ny.un.org/doc/UNDOC/GEN/G16/444/22/PDF/G1644422.pdf?OpenElement>.

¹⁰ Human Rights Council, *Report of the Working Group on the Universal Periodic Review: Togo*, (March 1, 2017), U.N. Doc. A/HRC/34/4/Add.1. Also available online at <https://documents-dds-ny.un.org/doc/UNDOC/GEN/G17/049/28/PDF/G1704928.pdf?OpenElement>.

¹¹ TOGOLESE CONSTITUTION art. 15.

Also available online at https://www.constituteproject.org/constitution/Togo_2007.pdf?lang=en.

¹² TOGOLESE CONSTITUTION art. 16.

Also available online at https://www.constituteproject.org/constitution/Togo_2007.pdf?lang=en.

¹³ TOGOLESE CONSTITUTION art. 21.

Also available online at https://www.constituteproject.org/constitution/Togo_2007.pdf?lang=en.

¹⁴ TOGOLESE CONSTITUTION art. 25.

Also available online at https://www.constituteproject.org/constitution/Togo_2007.pdf?lang=en.

¹⁵ Amnesty International, *Shadow Report to the African Commission on Human and People's Rights*, (London:

Amnesty International Publications, October 2018). 6.

Also available online at <https://www.amnesty.org/download/Documents/AFR5782022018ENGLISH.pdf>.

¹⁶ Human Rights Council, *National Report submitted in accordance with paragraph 5 of the annex to Human Rights Council resolution 16/21: Togo*, (August 17, 2016), U.N. Doc. A/HRC/WG.6/26/TGO/1, ¶47. Also available online at <https://documents-dds-ny.un.org/doc/UNDOC/GEN/G16/182/57/PDF/G1618257.pdf?OpenElement>.

¹⁷ Office of the High Commissioner for Human Rights, “Human Rights Committee Raises Concerns about Torture, Transitional Justice and Sexual Minorities in Dialogue with Togo,” accessed July 14, 2021, <https://www.ohchr.org/EN/NewsEvents/Pages/DisplayNews.aspx?NewsID=27250&LangID=E>.

¹⁸ Office of the High Commissioner for Human Rights, “Togo Homepage,” accessed July 14, 2021, <https://www.ohchr.org/EN/Countries/AfricaRegion/Pages/TGIndex.aspx>.

¹⁹ Ligue Togolaise des Droits de l’Homme, *La Terreur contre le Peuple*, (April 2019), 10. On file with authors. (hereinafter referred to as « *La Terreur contre le Peuple* »).

²⁰ *La Terreur contre le Peuple*, 12, 30.

²¹ *La Terreur contre le Peuple*, 11.

²² *La Terreur contre le Peuple*, 10.

²³ Regroupement des Jeunes Africains pour la Démocratie et le Développement, Réseau Africain pour les Initiatives de Droits de l’Homme et de Solidarité, *Plus de 100 morts*, (Togo : January 31, 2018), 29. On file with authors. (hereinafter referred to as « *Plus de 100 morts* »).

²⁴ *Plus de 100 morts*, 29.

²⁵ *Plus de 100 morts*, 29.

²⁶ *Plus de 100 morts*, 29.

²⁷ *Plus de 100 morts*, 29.

²⁸ *Plus de 100 morts*, 29.

²⁹ *La Terreur contre le Peuple*.

³⁰ *La Terreur contre le Peuple*, 18.

³¹ *La Terreur contre le Peuple*, 18.

³² *La Terreur contre le Peuple*, 24, 34.

³³ *La Terreur contre le Peuple*, 34.

³⁴ *Plus de 100 morts*, 32.

³⁵ Front Line Defenders, *Continued Detention of Human Rights Defender and Youth Leader Foly Satchivi* (August 30, 2018). Also available online at <https://www.frontlinedefenders.org/en/case/continued-detention-human-rights-defender-and-youth-leader-foly-satchivi>, (accessed January 30, 2020), (hereinafter referred to as “*Continued Detention*”).

³⁶ *La Terreur contre le Peuple*, 25.

³⁷ *Plus de 100 morts*, 31-32.

³⁸ *Plus de 100 morts*, 32.

³⁹ *Plus de 100 morts*, 31.

⁴⁰ *Plus de 100 morts*, 31.

⁴¹ *La Terreur contre le Peuple*, 34.

⁴² *La Terreur contre le Peuple*, 34.

⁴³ Correspondence with NGO representative (July 13, 2021).

⁴⁴ *Plus de 100 morts*.

⁴⁵ *Plus de 100 morts*, 30, 142-149.

⁴⁶ *La Terreur contre le Peuple*, 18-22.

⁴⁷ *La Terreur contre le Peuple*, 24, 34.

⁴⁸ *La Terreur contre le Peuple*, 24, 34.

⁴⁹ *La Terreur contre le Peuple*, 19.

⁵⁰ *La Terreur contre le Peuple*, 34.

⁵¹ *La Terreur contre le Peuple*, 34.

⁵² *La Terreur contre le Peuple*, 34.

⁵³ *La Terreur contre le Peuple*, 19.

⁵⁴ *La Terreur contre le Peuple*, 19.

⁵⁵ *Plus de 100 morts*.

⁵⁶ Société Civile Média, *Togo-Droits de l'Homme: Le président du REJADD mis aux arrêts!* (April 4, 2018), <http://societecivilemedia.com/togo-droits-de-lhomme-president-rejadd-mis-aux-arrets/> (accessed June 13, 2019).

⁵⁷ Société Civile Média, *Togo: Assiba Johnson libéré, Foly Satchivi réclamé* (April 5, 2019), <http://societecivilemedia.com/6643-2/> (accessed June 14, 2019).

⁵⁸ Front Line Defenders, *Continued Detention of Human Rights Defender and Youth Leader Foly Satchivi* (August 30, 2018).

Also available online at <https://www.frontlinedefenders.org/en/case/continued-detention-human-rights-defender-and-youth-leader-foly-satchivi> (accessed January 30, 2020), (hereinafter referred to as “*Continued Detention*”).

⁵⁹ *Continued Detention*.

⁶⁰ *Continued Detention* (updated January 18, 2019).

⁶¹ *Continued Detention* (updated October 16, 2019).

⁶² *Continued Detention* (updated October 16, 2019).

⁶³ Interviews with clients of The Advocates, 2020-2021.