



## Inciting Genocide, Pleading Free Speech

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In November 1991, a large drawing of a machete appeared on the cover of *Kangura*, a Hutu-owned Rwandan tabloid. Along one edge of the machete's curved blade appeared the question: WHAT WEAPONS SHALL WE USE TO CONQUER THE INYENZI ONCE AND FOR ALL?? "*Inyenzi*," or cockroach, was a term coined in the 1960s by some of Rwanda's governing Hutus to refer to rebel fighters of Rwanda's minority ethnic group, the Tutsi. In the early 1990s, *inyenzi* became a slur applied to any Tutsi.

In April 1994, more than two years later, the Rwandan genocide erupted. Over the following three months, in what the United Nations later characterized as "a tidal wave of political and ethnic killings," more than 500,000 Tutsis and moderate Hutus were murdered by the armed forces, the presidential guard, and the ruling party's youth militia.

By the time the genocide began, after four years of civil war, Hassan Ngeze, the founder, publisher, and editor of *Kangura*, had printed reams of anti-Tutsi vitriol, but he had not called for mass killing of Tutsi civilians. In fact, he had stopped publishing his paper by the time the genocide began, and no killings were directly linked to what he had printed. So after Ngeze was indicted in 1997 for incitement to genocide, among other crimes, by the International Criminal Tribunal for Rwanda (which had been convened in Arusha, Tanzania), three judges had to decide whether he could be held responsible for causing the killings of hundreds of thousands of people—or had been exercising his right to free speech when he

published his anti-Tutsi materials. Ngeze was tried together with two other media executives: Ferdinand Nahimana and Jean-Bosco Barayagwiza, both founders of a radio station, Radio Télévision Libre des Mille Collines (RTLM), whose anti-Tutsi vitriol was more explicit than that of *Kangura*. RTLM broadcasters not only read out the names of people to be killed but added their license plate numbers—so they could be hunted down if, after hearing their names on the radio, they tried to escape by car.

At the end of the "Media" trial, which lasted more than three years, the judges—a South African, a Sri Lankan, and a Norwegian—issued a 361-page ruling that is a landmark in international law.<sup>1</sup> They found Ngeze, Nahimana, and Barayagwiza guilty, declaring: "Without a firearm, machete or any physical weapon, you caused the deaths of thousands of innocent civilians." As one witness put it, the defendants' crime was to "spread petrol throughout the country little by little, so that one day [they] would be able to set fire to the whole country."<sup>2</sup> The judges agreed. Their decision was legally daring and, in spite of its length, not fully explained. But it was correct.

### *Incitement to Genocide*

The Media case is important for the historical analysis inherent in its verdict, as well as the potentially far-reaching law it laid down. In trying Ngeze and his two codefendants, the international tribunal suggested answers to the most important questions underlying its work: what causes genocide and how might it be prevented?

Incitement is a hallmark of genocide, and it may be a prerequisite for it. Each modern case of genocide has been preceded by a propaganda campaign transmitted via mass media and directed by a handful of political leaders. If such campaigns could be stopped—or their masterminds deterred—genocide might be averted.

Within a few days of Hitler's rise to power in 1933, his chief of propaganda, Joseph Goebbels, exulted that "radio and press are at our disposal" and began shutting down anti-Nazi newspapers.<sup>3</sup> Throughout the rest of the 1930s, the Nazi-controlled media spewed virulent anti-Semitic propaganda.

In Bosnia and Herzegovina in the early 1990s, Serbian forces took over so many television transmitters that large areas were left with Serb-controlled television only. The anti-Croat and anti-Muslim messages transmitted on Serb television were "very cogent and potent," according to Ed Vulliamy, a British journalist who was there. "It was a message of urgency, a threat to your people, to your nation, a call to arms, and yes, a sort of instruction to go to war for your people.... It pushed and pushed. It was rather like a sort of hammer bashing on peoples' heads, I suppose."<sup>4</sup>

And in Rwanda, RTLM so "heated up heads," in Rwandan parlance, during the period leading up to the genocide and during the genocide itself that the United States considered jamming its signal (but never did so).<sup>5</sup> Prime Minister Jean Kambanda (who later entered into a plea agreement in which he admitted to inciting genocide as well as other crimes) gave a speech over RTLM in June 1994, urging the station to continue inciting massacres and calling it "an indispensable weapon in the fight against the enemy."<sup>6</sup>

We cannot be certain that Kambanda was in essence correct—that incitement is indispensable to genocide—but history and the scholarly literature suggest as much.<sup>7</sup> As a Soviet delegate, who was apparently refer-

ring to the Holocaust, commented when the Genocide Convention was being debated by the U.N. General Assembly in 1948, "It was impossible that hundreds of thousands of people should commit so many crimes unless they had been incited to do so and unless the crimes had been premeditated and carefully organized."<sup>8</sup>

This idea is absent from many popular accounts of genocide, which attribute it to "ancient tribal hatreds." If "those people" have been killing each other for hundreds of years, such thinking goes, it is a waste of time to try to stop them. Perhaps not coincidentally, this primordialist theory gives outsiders an excuse not to try to prevent genocide.

To recognize the importance of incitement in causing genocide is not to ignore the role played by longstanding racial and ethnic prejudices. Incitement does not necessarily induce people to act against their own beliefs; when hate speech incites, it does so because the listener is receptive to such speech. Nor does the incitement theory argue that people who participate in genocide may be absolved of responsibility because they lack the will to behave differently. It is simply to highlight the power of media-borne messages to influence people, especially by engendering fear. To believe that incitement is a critical causal element in genocide, one need only recognize that people do not spontaneously rise up to kill en masse.

Before genocide can occur, a large number of people must come to condone killing. As the genocide scholar Helen Fein notes in describing this collective psychological process, one group of people must recategorize another group of people as outside "the boundaries of the universe of obligation."<sup>9</sup> The dominant group must come to see its putative victims as mortal threats (since killing can then be rationalized as self-defense) or as subhuman (as insects or animals), or both. Indeed, Jews, Bosnian Muslims, and Tutsis were all portrayed as ver-

min. Hutu leaders described Tutsis as cockroaches and also as snakes, Slobodan Milosevic referred to Bosnian Muslims as “black crows,” and in Nazi Germany, Julius Streicher, editor of the Nazi weekly *Der Stürmer*, termed the Jew “a germ and a pest, not a human being.”<sup>10</sup> (Later, at Nuremberg, Streicher became the first person to be convicted for incitement to genocide by an international tribunal, although the crime had not yet been codified as such.)

In each of these cases incitement was planned and directed by a few individuals for whom genocide was a political tactic. As the journalist Philip Gourevitch notes with biting clarity, “genocide...is an exercise in community building.”<sup>11</sup> Deterring genocide and war crimes—the ultimate goal of international criminal proceedings like the tribunal for Rwanda, its sister ad hoc tribunal for the former Yugoslavia (ICTY), and now the International Criminal Court—is an extremely difficult task. But the courts will have a better chance of succeeding in this if prosecutors take aim at those who incite genocide rather than individual perpetrators. (Ten years after the Rwandan genocide, 90,000 suspected *génocidaires* are still in prison in Rwanda, awaiting trial.)

#### *International Law on Incitement*

Incitement is codified in the statutes of the international tribunals, as well as in the Genocide Convention, as “direct and public incitement to genocide.” The authors of the convention did not explain what they meant by “direct,” so that task has been left to the courts. The simplest form of incitement, and the easiest to identify, functions as an immediate command. A speaker addresses a crowd, knowing that he or she has authority in the minds of the listeners, and arouses their murderous hatred against a specific “enemy.” Immediately afterward, the crowd acts on the suggestions of the speaker. This is the kind of incitement that John Stuart Mill proscribed in *On Liberty*: “An opinion that corn dealers are starvers of the poor

ought to be unmolested when simply circulated through the press, but [not] when delivered orally to an excited mob assembled before the house of a corn dealer.”<sup>12</sup>

The Rwanda tribunal’s first conviction for incitement to genocide was in response to just this sort of immediate incitement. Jean-Paul Akayesu, the *bourgmestre* (mayor) of the township of Taba, was accused of leading a public meeting on the morning of April 19, 1994, at which he urged his listeners to “eliminate accomplices of the RPF [Rwandan Patriotic Front], which was understood by those present to mean Tutsis.”<sup>13</sup> A member of the Interhamwe Hutu youth militia had been killed, and Akayesu held forth at the place where the body lay. A witness testified that Akayesu waved papers as he spoke, saying that they were Tutsi plans to exterminate the Hutu, seized from the home of a Tutsi “accomplice”—a teacher who had already been killed.<sup>14</sup> Soon after Akayesu’s speech, according to testimony at his trial, the massacres of Tutsis in Taba began.

This “immediate” incitement is relatively easy to recognize, but it is not the crime that brings about genocide; it comes too late. By the time Akayesu spoke, tens of thousands of Rwandans had already been massacred.

In its ruling in Akayesu’s case, the tribunal did not limit the definition of incitement to what he did. It took pains to point out that “direct and public” incitement need not refer exclusively to a speaker haranguing his listeners in person. Incitement might be transmitted “through speeches, shouting or threats uttered in public places or at public gatherings, or through the sale or dissemination, offer for sale or display of written material or printed matter in public places or at public gatherings, or through the public display of placards or posters, or through any other means of audiovisual communication.”<sup>15</sup> But could materials printed in a newspaper two years before the mass killing began constitute incitement to genocide?

A resounding and indignant “no” came from Ngeze’s theatrical American defense lawyer, John Floyd, and from the equally noisy Ngeze himself.

### *U.S. Incitement Law*

In U.S. law, which Floyd urged the tribunal to apply, incitement is defined by the likelihood that it will provoke an immediate response. U.S. law understands incitement narrowly, since it protects speech more broadly than any other body of law. Indeed, the fact that the Genocide Convention codifies the crime of incitement to genocide was one ostensible reason why the U.S. Senate refused to ratify the treaty for 38 years, until 1986. In my view, this fear of criminalizing incitement to genocide is misplaced, since incitement to violence in a relatively peaceful, stable society is quite different from incitement to genocide.

In *Brandenburg v. Ohio*, the controlling U.S. incitement case, the Supreme Court considered whether a rant by a member of the Ku Klux Klan, before a television camera in a field in rural Ohio, constituted incitement. The court ruled that such speech is illegal only if it is “directed at inciting or producing imminent lawless action” and is, in addition, “likely to incite or produce such action.” The distinction between “mere advocacy” and illegal incitement resided in whether those listening were likely to take *imminent* action in response to the speech. Interestingly, the Supreme Court carved out an exception to this doctrine in 2003, by permitting a state to ban cross burning “with the intent to intimidate” because cross burning in the United States, the court said, is “inextricably linked...to sudden and precipitous violence.”<sup>16</sup>

Under U.S. law, in other words, Ngeze probably would not have been found guilty of incitement, since the anti-Tutsi materials he published in *Kangura* did not produce an immediate violent response, and the editor burned no crosses. But U.S. law cannot be grafted onto international prosecutions for

incitement to genocide (as the Rwanda tribunal pointed out in its decision in the Media case). The crime at issue cannot be compared to *Brandenburg*’s hate speech, or even to cross burning with the intent to intimidate. Incitement to genocide is not merely a louder or more ominous form of hate speech.

Incitement to genocide, like genocide itself, is typically perpetrated by the state or by its allies, and is intended to increase the power of the state. By contrast, the right of free speech in the United States is most often invoked by those who seek to resist the government—the First Amendment protects *against* the state. (Indeed, the Ohio Klansman in *Brandenburg* had threatened “revengeance” against Congress, the president, and the Supreme Court—as well as against blacks and Jews.) Moreover, the “marketplace of ideas” theory on which U.S. free speech law is based is not applicable to incitement to genocide.

Odious and even violent speech is protected in the United States in the belief that the public discourse will contain it, that “bad” speech will eventually be mitigated by “good” speech. But where genocide is possible, those in charge have such disproportionate power, especially with respect to the means of disseminating information, that “good speech” has little effect. The Rwandan marketplace of ideas had long since collapsed by the time the mayor of Taba made his speech. Indeed that was the heart of his defense: “Once the massacres had become widespread, the Accused was denuded of all authority and lacked the means to stop the killings.” Such an argument should not (and did not) exonerate Akayesu, but it correctly pointed out that he was not in a position alone to cause or to prevent the genocide. It was already too late.

The dispositive crime—the one that makes the key difference—is the “spread [of] petrol throughout the country little by little.” The rub is that this type of incite-

ment is more difficult to identify and to distinguish from lawful speech. It does not fit into Mill's bifurcated formula; it is neither merely an opinion circulated through the press nor hate speech before an excited mob.

### *Spreading Petrol Little by Little*

The Ngeze form of incitement—of spreading petrol little by little—can be distinguished from protected speech, but it is necessary to step carefully. First, the legal standard for incitement to genocide must be distinguished from “mere” incitement to other forms of violence so that governments cannot plausibly invoke the law to stifle dissent. (Some critics have argued that the Rwanda tribunal's more expansive definition of incitement in the Media case will be employed by repressive governments wishing to muzzle the press. However, governments that shut down newspapers or broadcast outlets are usually content to do so without any pretext borrowed from international law.)

Next, certain legal criteria may be applied in order to distinguish incitement to genocide from political speech. The first of these criteria is the question of intent. To be convicted of incitement to genocide under international law, one must be shown to have had the specific intent to commit genocide, that is, “to destroy, in whole or in part, a national, ethnical, racial, or religious group, as such.” This means that a journalist who publishes or broadcasts someone else's views, no matter how hateful these views may be, cannot be held liable unless the journalist can be shown to share the opinions and genocidal aspirations of the source.<sup>17</sup>

Testifying at his trial, Ngeze disavowed genocidal intent. He said he had been “predicting” the deaths of Tutsis in his newspaper, not calling for them, and that he was merely trying to inform the public with lines like “Hutus must cease having any pity for the Tutsi,” which appeared in *Kangura* in a list of “Ten Commandments” for

Hutus. Ngeze insisted that he was not endorsing such ideas, but, in fact, the commandments were part of an incendiary tract titled, “Appeal to the Conscience of the Hutu.” As for the cover of *Kangura* described at the beginning of this essay, Ngeze said that it was a call for democracy, since it also bore a photograph of Grégoire Kayibanda, who was elected as the Rwandan republic's first president in 1961. But, as prosecution witnesses pointed out, Kayibanda is also known to Rwandans for presiding over widespread massacres of Tutsis. Rwandan witnesses further testified that to be included in one of the lists of the names of Tutsis that Ngeze published in *Kangura* was a “death warrant” and that Ngeze himself used to say that if he wrote about someone, that person would be killed. Ngeze testified that the lists were made up of people suspected of cooperating with fighters of the rebel Tutsi Rwandan Patriotic Front (RPF), and that he had obtained the lists from the government, so he was merely transmitting information by publishing them. In their written judgment, the judges in the case noted that in his testimony and other conduct during the trial, Ngeze had demonstrated “a thorough disregard for the truth.”

The second legal criterion for distinguishing incitement is foreseeability: whether speech is likely to provoke violence. That often depends on the authority and renown of the speaker. Ngeze was aware of *Kangura's* growing authority in the period leading to the genocide. In one editorial, he wrote: “*Kangura's* role will be studied in the history of Rwanda.... Besides, *Kangura* has revealed to the coming generation who the Tutsi is.” His boast that he could have someone killed by publishing the person's name, if true, proves that he did foresee the inflammatory effect of what he was printing.

If a defendant claims that he or she did not foresee the effect of his or her speech, it becomes the court's task to determine what the defendant should have been able to foresee. This is almost always complicated by



the ambiguous nature of the language of incitement. Like Ngeze, inciters rarely say, “Go out and kill.” Ngeze would be known in First Amendment jurisprudence as the “clever inciter,” and his case would bring to mind the so-called Mark Antony problem, after the rhetorical, coded speech that Shakespeare’s Mark Antony gives over Caesar’s bier, inciting his listeners against Brutus.

In its ruling in the Akayesu case, the Rwanda tribunal had already established that speech need not be explicit to be considered “direct” incitement. Where language is ambiguous, a court must try to discover how the audience understood the meaning of the words spoken—and whether the speaker should have foreseen how those who heard the speech would react. The judges who heard the Media case strove to understand the meaning of Ngeze’s articles and RTLM’s broadcasts as their Rwandan audiences would have understood them at the time.

Sitting in their courtroom in Arusha, the members of the International Criminal Tribunal for Rwanda pored over translations of *Kangura* and questioned witnesses about particular words and phrases. For example, the pejorative “*inyenzi*” began as a Rwandan slang term for armed Tutsi rebels, but according to several prosecution witnesses, including Georges Ruggiu, a Belgian who worked as a broadcaster at RTLM, by 1994 it had come to refer to any Tutsi.

Like Prime Minister Kambanda, Ruggiu pleaded guilty to incitement to genocide. His plea agreement contains a lesson in Rwandan genocidal slang of the 1990s. Just as the meaning of the term *inyenzi* changed over time, the phrase “go to work” came to be understood as an order to kill. As the tribunal noted in its judgment against him, citing his plea agreement, “the accused admits that as part of the move to appeal for, or encourage, ‘civil defence,’ he made a public broadcast to the population on several occasions to ‘go to work.’ The phrase ‘go to

work’ is a literal translation of the Rwandan expression that Phocas Habimana, Manager of the RTLM, expressly instructed the accused to use during his broadcasts. With time, this expression came to clearly signify ‘go fight against members of the RPF and their accomplices.’ With the passage of time, the expression came to mean, ‘go kill the Tutsis and Hutu political opponents of the interim government.’”<sup>18</sup>

Startlingly, perhaps, the judges in the Media case heard no evidence that any individual RTLM listener or *Kangura* reader killed someone in direct response to the station’s broadcasts or the paper’s articles and editorials since causation is not required to prove incitement under international law.

### *Where the Law Is Headed*

The trial in the Media case is a landmark in a developing body of international jurisprudence on incitement to genocide. Other courts around the world have also tried incitement cases deriving from the Rwandan genocide in recent years—with mixed results. Courts in Switzerland and Belgium have heard cases against Rwandans for incitement in the Akayesu mold (speeches delivered in person to a crowd). In one such case, Fulgence Niyonteze, the former mayor of the central Rwandan town of Mushubati, was sentenced to life in prison by a Swiss military tribunal in 1999 for crimes including murder and incitement to murder during the genocide, but a military appeals tribunal later dropped the conviction for incitement, on the basis that a military tribunal had no jurisdiction to try such crimes when committed abroad by a civilian.

In 1995, Rwandan expatriates tipped off Canadian immigration authorities that their compatriot Leon Mugesera, a well-known Hutu government official and pamphleteer in Rwanda before the genocide, had given a speech to a crowd of a thousand militants of the ruling MRND party in Kabaya, Rwanda, on November 22, 1992, a year and a half before the genocide. (MRND was the

acronym for the National Republican Movement for Development and Democracy, whose youth militia, the Interhamwe, carried out a large proportion of the killings in the 1994 genocide.) In the speech, which was later widely reported throughout Rwanda, Mugesera spoke of sending people “back to Ethiopia, by the Nyabarongo river.” During the genocide, thousands of Tutsi corpses were thrown into the Nyabarongo. By then, Mugesera had fled to Canada.

Two Canadian courts ordered Mugesera deported for having committed incitement, but in September 2003 appeals court judge Gilles Letourneau absolved Mugesera in an opinion scathingly critical of the lower courts. In Letourneau’s opinion, Mugesera did not mean to tell his audience to kill Tutsi, and could not have foreseen that they would understand him that way, if they did. “[T]here is nothing in the evidence to indicate that Mr. Mugesera, even under the cover of anecdotes or imagery, deliberately incited murder, hatred or genocide,” Letourneau wrote. Letourneau implied that the lower court judges had ordered Mugesera deported in part because they had relied on a faulty translation of his speech, but the version of it that Letourneau reproduced in full in his own decision contains such lines as “Do not be afraid, know that anyone whose neck you do not cut is the one that will cut your neck.”<sup>19</sup>

According to William Schabas, a Canadian law professor who visited Rwanda on a fact-finding mission in January 1993, the country was “in a state of turmoil and agitation provoked” by Mugesera’s speech, and the Rwandan justice minister had resigned in frustration after he was barred from prosecuting Mugesera for incitement. There is little doubt that Mugesera’s speech was widely understood in Rwanda—by his partisans and opponents alike—as a call to commit genocide. But he is guilty only if he intended and foresaw that his speech would be thus understood. Well-placed as he was

in the country’s leadership, it is hard to believe otherwise.

The Canadian Supreme Court has agreed to review the case. It should study not only the famous 1992 speech itself, but Mugesera’s other speeches, writings, and actions to determine whether he intended to incite genocide and whether he could have foreseen the effects of his speech.

Meanwhile, at the jail run by the United Nations in Arusha, another accused inciter is awaiting a trial that may push the law on incitement to genocide further, since the defendant is a musician, not a political figure or a journalist. Simon Bikindi was the best-known pop singer in Rwanda just before the genocide. Bikindi’s anti-Tutsi songs, which were broadcast constantly on RTLM, were reportedly one of the reasons for the station’s vast popularity, especially among the young.

Bikindi will be tried for conspiracy to commit genocide as well as for incitement to genocide. According to the tribunal’s prosecutors, his songs were an important part of a propaganda campaign on RTLM “to instigate, incite, and encourage the Hutu population to separate themselves from the Tutsi and to kill them.”<sup>20</sup> According to the indictment, Bikindi participated in the training of Hutu militias that later massacred Tutsis, and in June 1994, he led a caravan of militiamen along a road in Gisenyi prefecture, exhorting them over a public address system in his own vehicle to “exterminate quickly the remaining ones.” He is also accused of directly ordering militiamen to kill specific Tutsis.

The Rwanda tribunal should consider those allegations (if proved) in determining whether Bikindi intended to incite genocide, just as the Canadian Supreme Court must investigate Mugesera’s intent. Bikindi’s authority over his listeners and the effect of his music, like that of Mugesera’s speech, is hardly in doubt. In fact, Bikindi’s music has been banned in Rwanda since 1994.

Some would argue that to protect freedom of speech and expression Bikindi should not be prosecuted for the content of his music. But political speech or song can be distinguished from incitement to genocide. If Bikindi intended his music to incite others to commit genocide, he did commit a crime by singing. ●

## Notes

1. *The Prosecutor v. Ferdinand Nahimana, Jean-Bosco Barayagwiza, Hassan Ngeze*, Case No. ICTR-99-52-T, Judgement and Sentence, December 3, 2003.
2. *Ibid.*, p. 147.
3. See, for example, William Shirer, *The Rise and Fall of the Third Reich* (New York: Simon and Schuster, 1960), p. 189.
4. *Prosecutor v. Dusko Tadić*, Opinion and Judgement, IT-94-1, May 7, 1997, para. 96.
5. For good accounts of the debate over jamming, see Samantha Power, "A Problem From Hell": *America and the Age of Genocide* (New York: Basic Books, 2002), p. 371; and William A. Schabas, "Hate Speech in Rwanda: The Road to Genocide," *McGill Law Journal*, 141:46 (2000), p. 148.
6. Plea Agreement between Jean Kambanda and the OTP, cited in *The Prosecutor v. Jean Kambanda*, Case No. ICTR 97-23-S, Judgement and Sentence, September 4, 1998.
7. See, for example, Frank Chalk and Kurt Jonassohn, *The History and Sociology of Genocide: Analyses and Case Studies* (New Haven: Yale University Press, 1990), p. 27; Helen Fein, *Accounting for Genocide: National Responses and Jewish Victimization during the Holocaust* (New York: Free Press, 1984), p. 33.

8. UNAOR A/C.6/SR 84, 21 Sept.-10 Dec. 1948, p. 219.
9. Fein, *Accounting for Genocide*, p. 33, n.7.
10. *The Trial of German Major War Criminals, Proceedings of the International Military Tribunal, Nuremberg, Germany*, vol. 22, 1949, p. 501.
11. Philip Gourevitch, *We Wish to Inform You That Tomorrow We Will Be Killed With Our Families: Stories from Rwanda* (New York: Farrar, Straus and Giroux, 1998), p. 186.
12. John Stuart Mill, *On Liberty* (Arlington Heights, Ill.: Harlan Davidson, 1947), p. 55.
13. *The Prosecutor v. Jean-Paul Akayesu*, Case No. ICTR-96-4-T, Indictment, February 16, 1996, para. 14.
14. *The Prosecutor v. Jean-Paul Akayesu*, Judgement, September 2, 1998, para. 33.
15. *Ibid.*, para. 559.
16. *Virginia v. Black*, 538 U.S. 343 (2003).
17. This point is illustrated by the European Court of Human Rights case, *Jersild v. Denmark*, September 23, 1994, in which the court overruled the conviction of a journalist for airing an interview with virulently racist youths. The journalist's skeptical questions were judged to have distanced him sufficiently from his subjects' views.
18. *The Prosecutor v. Georges Ruggiu*, Case No. ICTR 97-32-I, Judgement and Sentence, June 1, 2000.
19. *Mugesera v. Canada (Minister of Citizenship and Immigration)*, Federal Court of Appeal, September 8, 2003.
20. *The Prosecutor Against Simon Bikindi, Indictment*, Case No. ICTR 2001-72-I, June 27, 2001.