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7 **UNITED STATES DISTRICT COURT**
8 **NORTHERN DISTRICT OF CALIFORNIA**
9

10 Jane Doe, individually, and on behalf §
11 of all others similarly situated; John §
12 Doe, individually, and on behalf of all §
13 others similarly situated §
DOES plaintiffs 1 through 1000, §

14 Plaintiffs, §

15 vs. §

16 Ivo Tanku Tapang, an individual; and §
17 DOES 1 through 5000. §
18 Defendants. §

Case No.:

**COMPLAINT FOR DAMAGES,
INJUNCTION AND
DECLARATORY RELIEF**

- 1. FOR PERSONAL INJURY AND WRONGFUL DEATH DAMAGES PURSUANT TO THE ANTI-TERRORISM ACT;
- 2. FOR PERSONAL INJURY AND WRONGFUL DEATH DAMAGES PURSUANT TO STATE TORT LAW;
- 3. FOR PERSONAL INJURY AND WRONGFUL DEATH DAMAGES PURSUANT TO THE ALIEN TORT CLAIMS ACT;
- 4. FOR RICO (18 U.S.C. § 1962(C))
- 5. FOR RICO CONSPIRACY (18 U.S.C. § 1962(D))
- 6. LIABILITY FOR AIDING AND ABETTING ACTS OF INTERNATIONAL

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- TERRORISM PURSUANT TO
18 U.S.C. § 2333(a)
- 7. LIABILITY FOR CONSPIRING
IN FURTHERANCE OF ACTS
OF INTERNATIONAL
TERRORISM PURSUANT TO
18 U.S.C. § 2333(a)
- 8. PROVISION OF MATERIAL
SUPPORT TO TERRORISTS IN
VIOLATION OF 18 U.S.C.
§2339a
- 9. NEGLIGENT INFLICTION OF
EMOTIONAL DISTRESS

DEMAND FOR JURY TRIAL

I. INTRODUCTION

This case concerns plaintiffs, Jane Doe and John Doe, U.S. citizens and resident of this County where this court is venued for Jane Doe, resident of Los Angeles county for John Doe, on behalf of themselves and all others similarly situated, who have suffered the death of beloved parents, children and siblings, and resulting from that, suffered severe emotional distress, harassment, anxiety, suffering, sleepless nights and other assorted grief and anguish due to the conduct, actions, participation, and material support of defendant Tapang Ivo Tanku (“Tapang”) to his agents, joint venturers, forces, organization named Ambazonia Defense Forces (“ADF”) which culminated in the death of plaintiff Jane Doe’s father and brother on May 20, 2018, and Plaintiff John Doe’s father in August of 2018.

Plaintiff Jane Doe files this complaint on behalf of herself, and others similarly situated, approximated in the thousands, residing here in the United States, citizens or residents of the United States, and/or Cameroonians, but who have lost loved ones and family, pain and anguish and suffering, due to the conduct and actions of defendant Tapang. Plaintiff John Doe files similarly.

Defendant Tapang, from what he presumes is a safe harbor hiding place at his San Jose residence in the USA, while he engages in terrorist acts occurring in Cameroon, has spectacularly and beyond any reasonable doubt (see Exhibits A and B charts illustrating over one hundred posts and videos, and hyperlinks to Tapang’s postings and links to his video posts, with all charts information and accompanying links documents and videos, fully incorporated herein) conducted himself and acted, participated, and materially supported actions by the ADF, for which he is the spokesperson, which has lead not just to the death of plaintiffs father and brother, but also of hundreds of innocent civilians.

Terrorism is broadly defined as “the unlawful use of violence and intimidation, especially against civilians, in the pursuit of political aims as,” and “international

1 terrorism,” according to 18 U.S.C. § 2331 as “activities that involve acts or acts
2 dangerous to human life that are in violation of the criminal laws of the United States
3 or of any State, that would be a criminal violation if committed within the jurisdiction
4 of the United States or of any State.” The conduct, actions, participation, and material
5 support of Tapang to the events of the May 20th attacks in Cameroon is terrorism in
6 miniature, as well as all other ADF and armed separatist groups attacks on innocent
7 civilians in the North West and South West regions of Cameroon. Because of the
8 foregoing, there can be no doubt: **Tapang is a terrorist, and one of the highest**
9 **order.** He must be stopped. While Tapang and his ilk will surely seek to hide behind
10 the protections of Constitutional First Amendment Rights to free speech, this case is
11 not about inhibiting their rights to free speech, or to engage in political advocacy, or
12 as a rights group, and it expressly disavows any such intentions, but it is about their
13 conduct, actions, material support, and participation in terrorism, which lead to
14 plaintiffs injuries. Tapang has engaged in conduct and actions equating to “training”,
15 “expert advice or assistance,” “service”, and providing “personnel” to the Ambazonia
16 Defense forces and its fighters, leading to deaths of innocent civilians, including the
17 parents and siblings of plaintiffs.

18 To better understand this case, a brief synopsis of the background of this matter
19 will be enlightening. Tapang is the spokesperson for a group that hails itself as
20 Ambazonia Defense Forces (“ADF”) with a stated political aim of secession or
21 separation from the Republic of Cameroon. However, in seeking that political goal,
22 Tapang, his agents, joint venture associates, co-conspirators, ADF and related
23 organizations, engage in acts of terrorism against innocent civilians that do not
24 subscribe to their stated political goal of separation from the Republic of Cameroon
25 to form an Ambazonia state, and it is such actions that led to the death of plaintiff Jane
26 Doe’s father and brother, plaintiff John Doe’s father, and sufferings of plaintiff
27 residing here in the USA. This same story is applicable to all other plaintiffs, US

1 residents and citizens, victims of Tapang’s conduct and actions that constitute material
2 support of terrorism, which he conducts from within the territorial jurisdiction of the
3 United States.

4 The loss of one’s life is never adequately compensated by monetary
5 compensation. Accordingly, this complaint will also seek a preliminary and
6 permanent injunction, as well as declaratory relief, against any and all conduct,
7 actions, participation, and material support of terrorism against Tapang, his
8 organizations, supporters, accomplices, and DOES defendants, who will be named
9 once discovery gets going and they are identified.

10 Plaintiffs will file, as appropriate, criminal complaints with the FBI offices with
11 jurisdiction over Tapang’s residence, police reports with local police terrorism units,
12 as well as complaints with the immigration authorities for his immigration law
13 violations. Plaintiffs seek, and will get, God willing, justice for themselves and all
14 others similarly situated.

15 NATURE OF ACTION

16 1. This is an action for damages against Ivo Tanku Tapang and DOES 1-
17 5000, pursuant to the Antiterrorism Act, 18 U.S.C. § 2333 (“ATA”) for aiding,
18 abetting, and knowingly providing material support and resources to the Ambazonia
19 Defense Forces (ADF) and other armed militia groups that carried out May 20th
20 attacks that killed plaintiff Jane Doe’s father and brother, plaintiff John Doe’s father,
21 as wells attacks throughout circa October 2016 to present that has killed hundreds of
22 innocent civilians, who are the parents, children, and spouses, of US citizens and
23 residents natives of Cameroon.

24 2. The ATA’s civil remedies have served as an important means for
25 enforcing the federal criminal anti-terrorism provisions since the early 1990s.

26 3. Congress enacted the ATA in October 1992 as a legal complement to
27 criminal penalties against terrorists that kill or injure Americans abroad, specifically

1 intending that the civil provisions would not only provide a mechanism for
2 compensating victims of terror but also serve as an important means of depriving
3 terrorists of financial resources to carry out attacks.

4 4. Following the bombing of the World Trade Center in New York by al-
5 Qaeda in 1993, Congress targeted terrorist resources again by enacting 18 U.S.C. §
6 2339A in September 1994, making it a crime to provide material support or resources
7 knowing or intending that they will be used in preparing or carrying out terrorist acts.

8 5. In April 1996, Congress further expanded the effort to cut off resources
9 to terrorists by enacting 18 U.S.C. § 2339B, making it a crime to knowingly provide
10 material support or resources to a designated foreign terrorist organization.

11 6. In the wake of the terror attacks on the United States by al-Qaeda on
12 September 11, 2001 killing nearly 3,000 Americans, Congress amended the “material
13 support” statutes, 18 U.S.C. §§ 2339A-B, via the PATRIOT Act in October 2001 and
14 the Intelligence Reform and Terrorism Prevention Act of 2004, to impose greater
15 criminal penalties for violating these statutes and to expand the definition of “material
16 support or resources” prohibited thereby.

17 7. The Ambazonia Defense Forces (“ADF”), of which Tapang is the
18 spokesperson, is the "official" military wing of the Ambazonian separatist movement,
19 and although other smaller, independent militias exist, they tend to cooperate closely
20 with the ADF if not absorb into it altogether.

21 8. Officially, ADF aims to raise the cost of Cameroon's military presence in
22 the region higher than the profits the country gets from there; their aim is to make
23 North-West and South-West regions of Cameroon “ungovernable”, and to coerce,
24 intimidate, kill, kidnap, harm any innocent civilians who do not obey or agree or
25 subscribe to their political goals.

1 1058, 1067-68 (9th Cir. 2000)(quoting *United States v. Doe*, 655 F.2d 920, 922 n.1
2 (9th Cir. 1981). Plaintiffs will seek leave of court to proceed under a pseudonym.

3 17. DOES Plaintiffs 1 -1000 are nationals of Cameroon, whether living in
4 the USA or in Cameroon, who have suffered injury or harm, whether to themselves,
5 or death of their parents and siblings, due to the actions of Tapang and DOES
6 Defendants. Plaintiffs have setup a website, www.cameroonvictims.org, where
7 similar plaintiffs, whether residing in the USA or in Cameroon, may submit in
8 confidentiality the story of their loss, so that plaintiff's attorney may join them in this
9 lawsuit.

10 18. Defendant Ivo Tanku Tapang, an individual, resides within this district,
11 in San Jose, California. A substantial portion of his material support activities were
12 conducted within this district.

13 19. DOES defendants 1 through 5000 are US residents, nationals, citizens,
14 who are natives of Cameroon, who have provided financial and other material support,
15 including training, expert advice or assistance, service, and personnel, to named
16 defendant Tapang Ivo, his ADF, agents, fighters, and related organizations, in
17 violation of Federal and State Anti-terrorism laws, and other criminal statutes.

18 20. DOES defendants 1 through 5000 are US residents, nationals, citizens,
19 who are natives of Cameroon, whose conduct, voluntary or involuntary, supports or
20 promotes the goals of Tapang Ivo, his ADF, agents, fighters, and related organizations
21 in violation of Federal and State Anti-terrorism laws, and other criminal statutes.

22
23 **JURISDICTION AND VENUE**

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25 21. The Court has jurisdiction over this case under 28 U.S.C. §1331 (federal
26 question jurisdiction); and 28 U.S.C. §1332 (diversity jurisdiction).

1 by the tortious act or omission of the Tapang Ivo and/or one or more of his agents or
2 partners acting within the scope of their agency or partnership.

3
4 **II. FACTUAL ALLEGATIONS**

5
6 **A. LEGAL BACKGROUND: ANTITERRORISM LEGISLATION**

7 i. The Antiterrorism Act (“ATA”)

8 28. In the 1980’s, terrorist groups carried out a number of major terror
9 attacks around the world, killing and injuring many Americans abroad.

10 29. Among these terror attacks were:

- 11 a. The April 1983 suicide bombing of the U.S. Embassy in Beirut, Lebanon,
12 killing 63 people, including 17 Americans;
- 13 b. The October 1983 suicide bombing of U.S. Marine barracks in Beirut,
14 Lebanon, killing 241 U.S. Marines and injuring more than 100;
- 15 c. the December 1983 terrorist bombings of the U.S. Embassy and the
16 residential quarters of American company Raytheon in Kuwait;
- 17 d. The September 1984 terrorist bombing of a U.S. Embassy annex
18 northeast of Beirut, Lebanon;
- 19 e. The June 1985 hijacking of TWA flight 847;
- 20 f. The October 1985 hijacking of the Achille Lauro cruise ship and murder
21 of wheelchair-bound American Leon Klinghoffer; and
- 22 g. The December 1985 terrorist bombings of the Rome and Vienna airports.

23 30. In response to these attacks, Congress in 1986 amended the U.S. Criminal
24 Code, Title 18, Part I, to add a new chapter titled, “Extraterritorial Jurisdiction Over
25 Terrorist Acts Abroad Against United States Nationals.”

1 31. This new chapter contained a new section titled, “Terrorist acts abroad
2 against United States nationals,” providing criminal penalties for killing, conspiring,
3 or attempting to kill a national of the United States, or engaging in physical violence
4 with the intent to cause serious bodily injury to a national of the United States or that
5 results in serious bodily injury to a national of the United States.

6 32. In addition, Congress later enacted the ATA, which established a private
7 cause of action for U.S. nationals injured by acts of international terrorism, as a legal
8 complement to the criminal penalties against terrorists that kill or injure Americans
9 abroad.

10 33. In enacting the ATA, Congress specifically intended that the civil cause
11 of action would not only provide a mechanism for compensating victims of terror, but
12 also serve as an important means of depriving terrorists of financial resources to carry
13 out attacks.

14 34. As the ATA was being considered in Congress, the State Department’s
15 Deputy Legal Advisor, Alan J. Kreczko, testified before the Senate Judiciary
16 Committee’s Subcommittee on Courts and Administrative Practice that this proposed
17 bill “will add to the arsenal of legal tools that can be used against those who commit
18 acts of terrorism against United States citizens abroad.”¹

19 35. The Deputy Legal Advisor also testified:

20 “[T]his bill will provide general jurisdiction to our federal courts and a cause of
21 action for cases in which an American has been injured by an act of terrorism
22 overseas.

23 We view this bill as a welcome addition to the growing web of law we are
24 weaving against terrorists. . . . The existence of such a cause of action . . . may
25 deter terrorist groups from maintaining assets in the United States, from
benefiting from investments in the U.S. and from soliciting funds within the

26 ¹ “Statement of Alan J. Kreczko, Deputy Legal Adviser, On S. 2465: A bill to provide a new civil cause
27 of action in federal court for terrorist acts abroad against United States nationals,” Before the
Subcommittee on Courts and Administrative Practice of the Senate Judiciary Committee (July 25,
1990), <https://www.state.gov/documents/organization/28458.pdf>.

1 U.S. In addition, other countries may follow our lead and implement
2 complimentary national measures, thereby increasing obstacles to terrorist
operations.

3 Moreover, the bill may be useful in situations in which the rules of evidence or
4 standards of proof preclude the U.S. government from effectively prosecuting
a criminal case in U.S. Courts. Because a different evidentiary standard is
5 involved in a civil suit, the bill may provide another vehicle for ensuring that
terrorists do not escape justice.”²

6 36. Likewise, Senator Grassley, one of the sponsors of the bill,
7 explained a purpose of ATA’s civil cause of action as follows:

8
9 “The United States must take a strong stand against terrorism. The Department
10 of State testified that this bill would add to the arsenal of legal tools that can be
used against those who commit acts of terrorism against U.S. citizens abroad.

11 . . .

12 Now is the time for action. Now is the time to strengthen our ability to both
deter and punish acts of terrorism.

13 We must make it clear that terrorists’ assets are not welcome in our country.
14 And if they are found, terrorists will be held accountable where it hurts them
most: at their lifeline, their funds.”³

15
16 37. In July 1992, a Senate Committee Report explained that the ATA’s
17 treble damages provision “would interrupt, or at least imperil, the flow of money” to
terrorist organizations.

18 38. In October 1992, Congress enacted ATA’s civil provisions,
19 including 18 U.S.C. §2333.

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21 **B. The “Material Support” Statutes and Regulations**

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26 ² Id.

27 ³ 36 Cong. Rec. 26716-26717 (Oct. 1, 1990), [https://www.gpo.gov/fdsys/pkg/GPO-CRECB-1990-
pt19/pdf/GPO-CRECB-1990-pt19-1.pdf](https://www.gpo.gov/fdsys/pkg/GPO-CRECB-1990-pt19/pdf/GPO-CRECB-1990-pt19-1.pdf).

1 39. On February 26, 1993, a group of *al-Qaeda* terrorists detonated a truck
2 bomb under the North Tower of the World Trade Center in New York City, attempting
3 to cause the collapse of both towers and the death of thousands of Americans.

4 40. Although the damage from the World Trade Center bombing was
5 limited, it nevertheless killed six people and injured more than one thousand.

6 41. In response, Congress again took aim at the resources available to
7 terrorists in September 1994 and enacted 18 U.S.C. § 2339A, making it a crime to
8 provide material support or resources to terrorists, knowing or intending that they
would be used for terrorist acts.

9 42. Tapang and DOES defendants engage in the provision of material
10 support of terrorism through their ADF and its agents and soldiers, ad defendants
11 conduct through fund raising meetings, declarations for actions which incite
12 immediate and imminent hard to innocent civilians, their officially declared aim of
13 conduct intimidation and threats against civilians, of kidnappings, and their
14 acknowledged kidnappings, killings, of civilians they find non-compliant with their
15 civilian goals. Tapang provides expert advice or assistance, personnel, training, and
16 service to the ADF and related armed militia who conduct acts of violence,
intimidation, killings against civilians in the Anglophone regions of Cameroon.

17
18 **PLAINTIFF SPECIFIC FACTUAL ALLEGATIONS AGAINST**
19 **TAPANG AND HIS ORGANIZATION ADF**

20 43. Plaintiffs, still with a heavy heart from her loss, and mindful that she is
21 going up against defendant Tapang, a terrorist, who does not value human life, and
22 who has terrorist ADF forces at this disposal, beck and call who may wreck further
23 unimaginable pain to her and family at his instructions, however, bravely, by and
24 through their undersigned counsel, hereby further specifically allege :

25 44. Plaintiffs, individually and on behalf of those similarly situated, are the
26 surviving children of the victims murdered in the May 20, 2018 terrorist attacks which
27 killed plaintiffs' father and brother in Kumbo, Bui Division, North-West Region,

1 Cameroon. (the "May 20th Attacks") and individuals who suffered personal injuries
2 in the May 20th Attacks incited, participated, assisted, contributed materially,
3 organized, and supported by defendant Tapang Ivo, as well as all those innocent
4 civilians who have suffered similar losses circa October 2016 to present due to the
5 conduct and material support of Tapang and his accomplices, ADF, and Doe
6 defendants.

7 45. Plaintiffs seek such relief against the Tapang Ivo for the attributable acts
8 of the Ambazonia Defense Forces and its bodies, alter -egos, and officers, employees
9 and agents acting within the scope of their office, employment or agency by Tapang
10 knowingly providing material support and resources to the Ambazonia Defense
11 Forces terrorist organization and facilitating the May 20th Attacks, deaths of hundreds
12 of others, in that, as set forth in detail herein, he:

- 13 a. Raised, laundered and paid substantial financial support to Ambazonia
14 Defense Forces to fund its budget and terrorist activities, including the
15 preparation and execution of the May 20th Attacks, and scores of other
16 violence, intimidation of civilians, and destruction of property.
- 17 b. Funded the terrorist training camps in the North-West and South-West
18 regions of Cameroon where Ambazonia Defense Forces indoctrinated
19 and taught their soldiers how to carry out guerilla warfare, intimidation,
20 violence, and terrorism against any military or uncooperative or
21 unsupportive civilians.
- 22 c. Provided critical logistical support and resources to Ambazonia Defense
23 Forces around North-West and South-West regions of Cameroon,
24 funding safe houses, transferring Ambazonia Defense Forces money,
25 weapons and equipment across international borders and other
26 assistance, all of which enabled Ambazonia Defense Forces to conduct
27 the May 20th Attacks and kills scores of other civilians;

1 d. Actively supported Ambazonia Defense Forces in its final preparations
2 for the May 20th Attacks through a network of the their soldiers, officers,
3 and/or agents who met with and aided the ADF killers, providing them
4 with money, cover, advice, contacts, transportation, assistance and other
5 material support and resources.

6 46. Provides expert advice or assistance to the ADF and related organizations
7 through his regular Facebook postings, YouTube videos, which advises the ADF
8 fighters how, when, to act, stance to adopt, how to react, and instructions on
9 punishments to meter to innocent civilians who don't obey, including plaintiffs
10 parents.

11 47. Similar to paragraph 50 above, Tapang provides the afore-noted services
12 to the ADF and related organizations as described in paragraph 50. These services also
13 recruit "personnel" for the ADF and related organizations, serve as media and public
14 relations for the ADF and related organizations and armed militia groups.

15 48. Provides ADF and the armed militia with training on how to engage in
16 subterfuge, propaganda, to achieve their goals of separation from the Republic of
17 Cameroon.

18 49. All the above-noted actions are in violation of 18 U.S.C. §§ 2339A, the
19 statute that prohibits the provision of material support with the knowledge or intent
20 that the support be used to carry out a terrorist attack.

21

22 **DOCUMENTS AND POSTS BY TAPANG SUPPORTING ALL**
23 **FACTUAL ALLEGATIONS**

24 50. Attached as **Exhibit A** to this complaint is conduct and postings and
25 articles detailing specific conduct and material support by Tapang noted in paragraphs
26 43 through 53, that are directed to inciting, and in fact do incite, imminent lawless
27 action, with such conduct and speech, not only likely to produce such lawless action,

28

1 but actually did produce the lawless action, including but not limited to, the May 20th
2 attacks where plaintiffs father and brother died, as well as loss of hundreds of innocent
3 civilian lives in the North-West and South-West regions, terrorizing students from not
4 going to school for over two years and ongoing, from late 2016 to present, disruption
5 of business and commercial activities, and instigating fear in all civilians in these
6 regions to adhere strictly to the edicts from defendant Tapang and his organization.

7 51. Exhibit A reflects plaintiffs' allegations that Tapang's conduct, actions,
8 and speech intended to incite a violent or lawless action, and that the action was likely
9 to imminently occur, and in fact did occur repeatedly, as a result.

10 **VIDEOS OF TAPANGS CONDUCT AND ACTIONS SUPPORTING**
11 **ALL FACTUAL ALLEGATIONS**

12 52. Attached as **Exhibit B** to this Complaint is the table comprising 37
13 separate columns of videos, noting date of video and title of video, illustrating the
14 conduct, actions, and speech of Tapang showing his material support of ADF
15 terrorism in general, the May 20th attacks, and ongoing, and evidencing his material
16 support of training, expert advice or assistance, service, and personnel provided to the
17 ADF and related militia.

18 **Ivo Tapang's knowledge of Ambazonia Defense Forces and its terrorist**
19 **agenda against decedents prior to May 20, 2018 and continuing.**

20 53. In a wide variety of actions and conduct leading to the attacks on May
21 20, 2018, which caused Jane Doe's father's death, Ivo Tapang promised death, harm,
22 retribution, and injury to any civilians who dared to support the May 20th
23 Independence day celebrations of the Republic of Cameroon, as well as since October
24 2016, has consistently supported violence, intimidation, and criminal acts against
25 civilians who do not strictly abide by his organization's edicts, such as, "ghost town",
26 where all shops must be closed, and "no schools," a prohibition against students
27 returning to school until his aim of an independent Ambazonia state is achieved.

1 54. At all relevant times mentioned herein, Ivo Tapang: adopted an extremist
2 version of secession, seeking violence and terror and kidnappings and intimidation
3 against any non-compliant civilian as the means to achieve secession from the
4 Republic of Cameroon.

5 55. As detailed herein, Ivo Tapang's ADF agents, partners, and joint venture
6 associates, continued to provide material support and resources for Ambazonia
7 Defense Forces through late 2016, and including May 20, 2018 to present, combined
8 actions that led to plaintiffs parents death, and the deaths of hundreds of others.

9
10 **Ivo Tapang's tortious acts were a proximate cause of the May 20th Attacks**
11 **and the killings of hundreds of civilians.**

12 56. The planning for the May 20th Attacks began, on information and belief,
13 on or about March of 2018, as Tapang decided to forcefully stop and any all May 20th
14 (which is Cameroon's Independence Day) celebrations in the North-West and South-
15 West Regions.

16 57. Tapang and his accomplices, and DOES defendants, set in motion, a
17 series of postings, threats, warnings, to any Anglophone civilian who dares venture
18 outside to acknowledge or "celebrate" the 20th of May independence day, that is,
19 customarily, a cause of celebration in prior years throughout the Republic of
20 Cameroon.

21 58. On that fateful day, Jane Doe's father and brother, being present in
22 Kumbo, and having been suspected of being sympathizers to the government of
23 Cameroon, were shot down by fighters of ADF for "leaving their home."

24 59. A witness to the incident stated that Jane Doe's father had been sick for
25 a few days, and it was urgent that his son take him to the hospital, and when his
26 condition deteriorated drastically on the morning of May 20th, they had no choice but
27 to try to seek medical attention and leave their residence. Yet, in using the material

1 support provided by Tapang, ADF fighters mercilessly killed Jane Doe's father and
2 brother as suspected sympathizers of Cameroon's government and for violating their
3 strict edict for no May 20th celebrations.

4 60. As detailed herein, at each stage of Ambazonia Defense Forces' planning
5 and execution leading up to the May 20th Attacks, Ivo Tapang knowingly provided
6 Ambazonia Defense Forces with support, financing and resources that were material,
7 substantial and critical to the success of the May 20th Attacks.

8 61. John Doe's father was killed by Tapang's ADF because, as they stated
9 and posted his dead body in social media groups, he was a traditional ruler and spy of
10 the Cameroon government.

11 **Ivo Tapang's direct funding of ADF**

12 62. Ivo Tapang is responsible for coordinating and raising substantial
13 funding of Ambazonia Defense Forces that was vital to the operation of that terrorist
14 organization and its preparations for and realization of the May 20th Attacks, as well
15 as all other attacks and killings of innocent civilians from late 2016 to present,
16 including but not limited to the following:

17 63. Top ranking Ivo Tapang sympathizers made substantial financial
18 contributions to Ambazonia Defense Forces;

19 64. From 2017 through and including May 20, 2018, Ivo Tapang, acting
20 through his agents, joint venture associates, and partners, including Does Defendants
21 1-5000, have raised money through meetings, groups, social media, to support their
22 ADF fighters and related organizations in executing their stated political aims and
23 official positions, which includes terrorism as defined in USC code against innocent
24 civilians. Some of these civilians have relatives abroad here in the USA, and their
25 death, torture, kidnapping directly affects their USA citizen families.

- 1 o. Expert advice and assistance on how to obtain separation by violence and
- 2 force from Cameroon
- 3 p. Assistance with the training of ADF fighters
- 4 q. Using other social media such as email, twitter, Skype, WhatsApp to
- 5 promote ADF violent agenda, plan the dates and times of attacks, and other
- 6 activities in violation of USA laws.
- 7 r. Recruiting of administrative personnel in the USA to assist the ADF in all
- 8 aspects of its goals.
- 9 s. Providing media relations service, coordination services, for the ADF in the
- 10 USA; and so on and forth, without limitation.

11 **Ivo Tapang's domination and control of ADF conduct**

12 68. As set forth herein, at all relevant times, Tapang used his position from
13 the USA to effectuate all the various services, conduct, and duties, without limitation,
14 listed in paragraph 71 above, and paragraphs 43 through 53.

15 69. Tapang is the spokesperson of the ADF and de facto leader of the ADF
16 in the United States.

17 70. Attached as **Exhibit C** is a selected excerpt from the venerable Human
18 Rights Watch, the report section discussing the violence and abuses of armed
19 separatist groups like the ADF in Cameroon.

20 71. Attached as **Exhibit D** is chart comprising two hundred (200) articles,
21 posts, references with regards to the crimes, terror, torture, kidnappings, and other
22 national and international law violations of the ADF.

23 **FIRST CAUSE OF ACTION**

24 **TO RECOVER PERSONAL INJURY AND WRONGFUL DEATH**

25 **DAMAGES PURSUANT TO THE ANTI-TERRORISM ACT**

26 72. Plaintiffs repeat and re-allege all of the preceding paragraphs as if fully
27 set forth herein.

1 73. This action is brought pursuant to 18 U.S.C. § 2333(a) for the injuries
2 and deaths suffered by U.S. nationals' parents and siblings in the May 20th Attacks as
3 well as other attacks causing plaintiffs harm and injuries.

4 74. Those attacks constituted acts of international terrorism pursuant to 18
5 U.S.C. §2331 that violated federal and state laws against murder, kidnapping, assault
6 and aircraft hijacking, including but not limited to 18 U.S.C. §2332b (prohibiting
7 terrorist acts of kidnapping, assault and murder).

8 75. Pursuant to 18 U.S.C. §2333(a), (d), Ivo Tapang aided and abetted
9 Ambazonia Defense Forces through numerous acts detailed herein by knowingly
10 providing it with substantial material assistance to prepare and carry out an act or acts
11 of international terrorism.

12 76. Pursuant to 18 U.S.C. §2333(a), (d), Ivo Tapang conspired with
13 Ambazonia Defense Forces and others to provide it with substantial material support
14 and resources, with the shared understanding, knowledge and intent that said support
15 and resources would be used by Ambazonia Defense Forces to prepare and carry out
16 an act or acts of international terrorism.

17 77. The others in the conspiracy currently known to plaintiffs are not named
18 herein, but include Ayaba Cho, Chris Anu, Boh Hebert, Akwanga Ebenezer, Mark
19 Baretta, Ikome Sako, Eric Tataw, and others.

20 78. Pursuant to §2333(a), Ivo Tapang committed an act or acts of
21 international terrorism, as defined in 18 U.S.C. § 2331(1)(A), in violation of federal
22 and state criminal laws, or that would have been a criminal violation if committed
23 within the United States or any state, including but not limited to a violation of the
24 following:

- 25
26 a. 18 U.S.C. §2(a) — Aiding, abetting, counseling, commanding, inducing
or procuring a federal crime;
27 b. 18 U.S.C. §371 — Conspiring to commit a federal crime;

- c. 18 U.S.C. §2332b — Conspiring to commit an act of terrorism;
- d. 18 U.S.C. §2339A - Providing material support to terrorists;
- e. 18 U.S.C. §2339C - Prohibitions against the financing of terrorism;
- f. CA Penal Code §31 — Accomplice liability – Aiding and Abetting Law;
- g. CA Penal Code §182 - Criminal Conspiracy
- h. CA Penal Code §32 – Accessory after the fact

79. Tapang's conduct amounted to a violation of 18 U.S.C. § 2(a) because Tapang intentionally aided, abetted and counseled the commission of a criminal act or acts of international terrorism by Ambazonia Defense Forces, including its operatives, by providing the terrorist organization with material support, resources and funding with the knowledge that Ambazonia Defense Forces would use such assistance to prepare for and commit such a criminal act or acts.

80. Tapang's conduct amounted to a violation of 18 U.S.C. §371 because it conspired with Ambazonia Defense Forces and others to provide it with substantial material support and resources with the shared understanding, knowledge and intent that said support and resources would be used by Ambazonia Defense Forces to prepare for and carry out a criminal act or acts of international terrorism.

81. Tapang's conduct amounted to a violation of 18 U.S.C. §2339A in that on and prior to May 20, 2018, and continuing today, he provides material support or resources for Ambazonia Defense Forces and/or conspired with Ambazonia Defense Forces and others to provide material support or resources for Ambazonia Defense Forces, with the knowledge or intent that they would be used in preparation for, or in carrying out a violation of the statutes specified in 18 U.S.C. §2339A, including 18 U.S.C. §2332b (prohibiting terrorist acts of kidnapping, assault and murder) and violation of others laws as itemized in paragraph 80.

82. Tapang's conduct amounted to a violation of 18 U.S.C. § 2339A in that it concealed or disguised the nature, location, source, or ownership of Ambazonia Defense Forces' material support or resources and/or conspired with ADF and Tapang's agents, Tapang's accomplices, Ambazonia Defense Forces, Ambazonia

1 Defense Forces operatives and sympathizers and others, known and unknown, to
2 conceal or disguise the nature, location, source or ownership of Ambazonia Defense
3 Forces' material support or resources, with the knowledge or intent that they would
4 be used in preparation for, or in carrying out a violation of the statutes specified in 18
5 U.S.C. §2339A, including 18 U.S.C. §2332b (prohibiting terrorist acts of kidnapping,
6 assault and murder) and violation of others laws as itemized in paragraph 80.

7 83. Tapang's conduct amounted to a violation of relevant state criminal laws
8 on facilitating, aiding and abetting a crime, and conspiracy, including but not limited
9 to those cited above, in that it:

- 10 a. intentionally aided, abetted and counseled Ambazonia Defense Forces by
11 providing it with material support, resources and funding with the
12 knowledge that Ambazonia Defense Forces would use such assistance to
13 commit an act or acts of international terrorism; and/or
- 14 b. believing it was probably rendering aid in the form of material support
15 or resources and funds to Ambazonia Defense Forces to engage in a
16 crime, provided Ambazonia Defense Forces with the means or
17 opportunity for the commission thereof and which in fact aided
18 Ambazonia Defense Forces to commit the May 20th Attacks; and/or all
19 other attacks and intimidation on innocent civilians from October 2016
20 to present.
- 21 c. conspired with ADF leaders, soldiers, and fighters, particularly the
22 Ambazonia Defense Forces, Ambazonia Defense Forces operatives and
23 sympathizers and others known and unknown, to violate relevant state
24 criminal laws on facilitating and aiding and abetting a crime and
25 committing an act or acts of terrorism, including assault, kidnapping and
26 murder.

27 84. As detailed herein, the aforesaid act or acts of international terrorism:

- 1 a. involve a violent act or acts dangerous to human life, as demonstrated by
2 the known and foreseeable outcomes of injury and death resulting from
3 providing substantial assistance to Ambazonia Defense Forces terrorists;
4 b. were committed primarily outside the territorial jurisdiction of the United
5 States and also transcended national boundaries in terms of the means by
6 which they were accomplished, the persons they appear intended to
7 intimidate or coerce, and the locales in which their perpetrators operated;
8 and
9 c. appeared to be intended to intimidate or coerce a civilian population; to
10 influence the policy of a government by intimidation or coercion; or, to
11 affect the conduct of a government by mass destruction, kidnapping or
12 assassination.

13 85. The aforesaid acts of Tapang were not mere negligence, but each act
14 individually and/or in combination with one or more acts, constituted conduct that was
15 intentional, reckless, willful and/or grossly negligent and each of those acts
16 individually and/or in combination with one or more of those acts was a proximate
17 cause of the May 20th Attacks, other relevant attacks, and the resulting injuries and
18 deaths of plaintiffs' parents and brother, as well as that of hundreds of other
19 Anglophone Cameroonians.

20 86. The May 20th Attacks, other attacks from October 2016 to present, could
21 not have occurred absent the knowing and substantial assistance provided to
22 Ambazonia Defense Forces by Tapang and those attacks and resulting injuries and
23 deaths were a natural, probable and reasonably foreseeable consequence of Tapang's
24 conduct.

25 87. As a result, the Tapang and all DOES defendants are liable to plaintiffs
26 for all damages resulting from the injuries and deaths in the May 20th Attacks, as well
27 as the deaths and sufferings of all those similarly situated as plaintiffs.

1 88. Plaintiffs, the surviving family members of each decedent, the decedents
2 and their Estates have suffered and will continue to suffer past and future damages as
3 a result of the injuries and deaths sustained in the May 20th Attacks and all attacks
4 from October 2016 to present, including but not limited to: personal injury damages,
5 wrongful death damages, survival damages, economic damages, pecuniary loss, non-
6 economic damages, pain and suffering, torture, imprisonment, kidnapping, fear of
7 impending death, physical trauma, mental anguish, mental distress, grief, loss of
8 enjoyment of life, loss of earnings, financial support, services, companionship, care,
9 guidance, consortium, burial costs, medical and other expenses and other provable
10 damages allowed by law.

11 89. WHEREFORE, plaintiffs pray that judgment(s) for relief in the form of
12 an award or awards of monetary damages for personal injury, wrongful death, all
13 recoverable losses under 28 U.S.C. §2333 and other appropriate relief be entered on
14 their first cause of action in favor of the plaintiffs individually and as estate
15 representatives and against the defendant Tapang Ivo, with separate awards for each
16 plaintiff, where appropriate, plus interest, costs, punitive damages, treble damages,
17 attorney's fees, and such other relief as the Court deems just and proper.

18
19 **SECOND CAUSE OF ACTION**
20 **FOR PERSONAL INJURY AND WRONGFUL DEATH DAMAGES**
21 **PURSUANT TO STATE TORT LAW**

22 90. Plaintiffs repeat and re-allege all of the preceding paragraphs as if fully
23 set forth herein.

24 91. Prior to and including May 20, 2018, Ivo Tapang: participated and
25 associated with Ambazonia Defense Forces in its terrorist agenda as set forth herein;
26 provided Ambazonia Defense Forces and its fighters with substantial material support,
27 financing and resources; knew that it was assisting a terrorist organization that had

1 conducted and was actively planning attacks against the United States; and committed
2 tortious acts and omissions that were intentional, knowing, reckless, willful, wanton,
3 grossly negligent and/or negligent.

4 92. Tapang's conduct was a proximate cause of the deaths, injuries and
5 resulting damages suffered by plaintiffs, as it furnished the essential support networks,
6 cover and funding used by Ambazonia Defense Forces to successfully plan and
7 execute the May 20th Attacks, as well as attacks that has killed hundreds of innocent
8 civilians.

9 93. Tapang tortuously aided and abetted Ambazonia Defense Forces by
10 providing substantial assistance in the form of funding, support and resources to
11 Ambazonia Defense Forces and its fighters with the knowledge that they planned to
12 use such assistance to prepare for and conduct terrorist attacks against innocent
13 civilians in Kumbo, Bui Division, North-west region as well as in other parts of
14 Anglophone Cameroon, and acted with reckless disregard of the known probable risk
15 that such assistance would be used for those terrorist purposes.

16 94. Tapang tortuously conspired with Ambazonia Defense Forces and others
17 to provide Ambazonia Defense Forces and its fighters with substantial material
18 support and resources, with the shared agreement, understanding, knowledge and
19 intent that said support and resources would be used by Ambazonia Defense Forces
20 to plan and carry out terrorist acts against the United States.

21 95. Despite such knowledge, Ivo Tapang intentionally and/or recklessly
22 failed to properly supervise its ADF soldiers, fighters, officers, and agents and to stop
23 them from using Ivo Tapang's resources, but rather desired to provide substantial
24 assistance to Ambazonia Defense Forces, despite the known and/or foreseeable risk
25 that such assistance was being used by Ambazonia Defense Forces to prepare and
26 conduct a terrorist attack on May 20th, as well as other dates, resulting in plaintiffs
27 harm.

1 96. Moreover, Ivo Tapang intentionally and/or recklessly selected, hired and
2 retained as its ADF fighters, soldiers, officers, agents, and various individuals, and
3 others, who Ivo Tapang knew were Ambazonia Defense Forces operatives or
4 sympathizers, despite the known and/or foreseeable risk that these persons and agents
5 would use and/or were using their positions to provide substantial assistance to
6 Ambazonia Defense Forces to prepare and conduct the May 20th attacks, as well as
7 other attacks against innocent civilians in the Anglophone regions.

8 97. The aforesaid intentional, criminal, knowing, reckless, willful, wanton,
9 grossly negligent and/or negligent acts and/or omissions of Ivo Tapang were
10 individually and/or in combination with one or more of those acts and/or omissions a
11 proximate, a substantial cause of the May 20th Attacks, as well as other attacks, and
12 the plaintiffs' injuries, deaths and resulting damages.

13 98. WHEREFORE, plaintiffs pray that judgment(s) for relief in the form of
14 an award or awards of monetary damages for personal injury, wrongful death and
15 other appropriate relief be entered on their second cause of action in favor of the
16 plaintiffs individually and as estate representatives and against the defendant Tapang
17 Ivo, with separate awards for each plaintiff, where appropriate, plus interest, costs,
18 punitive damages, treble damages, attorney's fees, and such other relief as the Court
19 deems just and proper.

20
21 **THIRD CAUSE OF ACTION**
22 **FOR PERSONAL INJURY AND WRONGFUL DEATH DAMAGES**
23 **PURSUANT TO THE ALIEN TORT CLAIMS ACT**

24 99. Plaintiffs repeat and re-allege all of the preceding paragraphs as if fully
25 set forth herein.

1 100. The Alien Tort Claims Act, 28 U.S.C. §1350, allows aliens to sue for
2 torts committed in violation of the law of nations, international law or a treaty of the
3 United States.

4 101. The conduct of Tapang as detailed herein to provide substantial material
5 support, resources and sponsorship for Ambazonia Defense Forces and its acts of
6 international terrorism resulting in the May 20th Attacks and all other attacks in
7 Cameroon from October 2016 to present constitutes a clear violation of the law of
8 nations and international law, which includes international legal norms prohibiting
9 crimes against humanity, mass murder, genocide, torture, extrajudicial killing, air
10 piracy, financing of terrorism, and terrorism, which can be found in and derived from,
11 among other things, the following conventions, agreements, U.N. declarations and
12 resolutions, and other documents:

- 13 a. Charter of the International Military Tribunal, Aug. 8, 1945, 59 Stat.
1544, 82 U.N.T.S. 279;
- 14 b. Allied Control Council Law No. 10 (Dec. 20, 1945);
- 15 c. Convention on the Prevention and Punishment of the Crime of Genocide,
16 Dec. 9 1948, 78 U.N.T.S. 277;
- 17 d. Geneva Convention (IV) Relative to the Protection of Civilian Persons
18 in Time of War, Aug. 12, 1949, 75 U.N.T.S. 287;
- 19 e. Hague Convention for the Suppression of Unlawful Seizure of Aircraft
20 (Hijacking), Dec. 16, 1970, 22 U.S.T. 1641, 860 U.N.T.S. 105;
- 21 f. International Convention for the Suppression of Terrorist Bombings,
22 Dec. 15, 1997, 2149 U.N.T.S. 284 (entered into force May 23, 2001);
- 23 g. International Convention for the Suppression of the Financing of
24 Terrorism, Dec. 9, 1999, 2178 U.N.T.S. 229 (entered into force Apr. 10,
25 2002);
- 26 h. U.N. Security Council Resolution 1267, U.N. Doc. S/RES/1267 (Oct. 15,
27 1999);
- 28 i. U.N. Security Council Resolution 1373, U.N. Doc. S/RES/1373 (Sept.
28, 2001);
- j. Protocol Additional (I) to the Geneva Conventions of 12 August 1949,
and Relating to the Protection of Victims of International Armed
Conflict, June 8, 1977, 1125 U.N.T.S. 3;

- 1 k. Protocol Additional (II) to the Geneva Conventions of 12 August 1949,
2 and Relating to the Protection of Victims of Non-International Armed
3 Conflicts, June 8, 1977, 1125 U.N.T.S. 609;
- 4 l. Statute of the International Criminal Tribunal for the Former Yugoslavia
5 (ICTY), in Report of the Secretary-General pursuant to paragraph 2 of
6 S.C. Res.808, May 3, 1993, U.N. Doc. 8/25704, adopted unanimously by
7 S.C. Res. 827, U.N. SCOR, 48th Sess., 3217th mtg., 16, U.N. Doc.
8 S/PV.3217 (1993);
- 9 m. The Convention on the Prevention and Punishment of Crimes Against
10 International Protected Persons, Including Diplomatic Agents, 28 U.S.T.
11 1975, T.I.A.S. No. 8532 (1977), implemented in 18 U.S.C. § 1121;
- 12 n. The General Assembly Resolutions on Measures to Prevent International
13 Terrorism, G.A. Res. 40/61 (1985) and G.A. Res. 42/159 (1987); and
- 14 o. The Convention on the High Seas, April 29, 1958, arts. 14-22 (piracy),
15 13 U.S.T. 2312, 450 U.N.T.S. 11.

16 102. Tapang's conduct was a substantial cause of the May 20th Attacks and
17 all other attacks from October 2016 to present against innocent civilians in the North
18 West and South West regions, and the plaintiffs' injuries, deaths and resulting
19 damages.

20 **FOURTH CAUSE OF ACTION**
21 **FOR RICO (18 U.S.C. § 1962(C))**

22 103. Plaintiff re-alleges and incorporates by reference all prior paragraphs of
23 this Complaint and paragraphs in the counts below as though set forth fully herein.

24 104. Tapang and all Does Defendants 1 – 5000 (collectively “Defendants”)
25 are all “persons” within the meaning of 18 U.S.C. § 1961(3). At all relevant times,
26 Defendants conducted the affairs of an Enterprise—which affected interstate and
27 foreign commerce—through a pattern of racketeering activity, in violation of 18
28 U.S.C. § 1962(c).

A. ADF is the Racketeering Enterprise

105. ADF is a Racketeering Enterprise, as that term is used in 18 U.S.C. §
1961(4). The Enterprise was formed by January of 2017.

1 106. ADF had an ongoing organizational framework for carrying out its
2 objectives.

3 107. As described above, Tapang and each DOES Defendant participated in
4 the operation or management of the Enterprise.

5 108. Because ADF raises hundreds of thousands of dollars to support their
6 terrorist operations in Cameroon, by contacting sympathetic USA based Anglophone
7 Cameroon natives, it affects interstate and foreign commerce.

8 109. Tapang and each DOES Defendant conducted and/or participated in the
9 affairs of the Enterprise through a pattern of racketeering activity, including acts
10 indictable under 18 U.S.C. §2(a) — Aiding, abetting, counseling, commanding,
11 inducing or procuring a federal crime; 18 U.S.C. §371 — Conspiring to commit a
12 federal crime; 18 U.S.C. §2332b — Conspiring to commit an act of terrorism; 18
13 U.S.C. §2339A - Providing material support to terrorists; 18 U.S.C. §2339C -
14 Prohibitions against the financing of terrorism; without limitation.

15
16 **B. Alternatively, and at the Very Least, ADF Was Part of an
17 Association-In-Fact Enterprise**

18 110. Alternatively, and at the very least, ADF was part of an Association-In-
19 Fact Enterprise comprising Tapang and DOES defendants, ADF, and similar
20 organizations. . The Association-In-Fact Enterprise was formed by at least January
21 2017. From that time until present, the members of the Association-In-Fact Enterprise
22 worked together to further their mutual goals of separation from the Republic of
23 Cameroon to form an Ambazonia state, using guerilla tactics, terrorism, providing
24 material support to ADF fighters and related organizations, violence and intimidation
25 of Anglophone Cameroonians who do not support their political aims, kidnappings,
26 and other evil atrocities.

1 111. The Association-In-Fact Enterprise has an ongoing organizational
2 framework for carrying out its objectives. In fact, the Association-In-Fact Enterprise
3 could not have carried out its intricate task of sharing confidential information at the
4 moments when it would be most beneficial to ADF unless it had some structure for
5 making and communicating group decisions. The Association-In-Fact knows how to
6 reach its ADF fighters, agents, camps to provide instructions on what carnage to
7 execute on designated dates and times, including the May 20th attacks.

8 112. As described above, each Defendant participated in the operation or
9 management of the Association-In-Fact Enterprise, and benefitted financially from the
10 enterprise.

11 113. Because the Association-In-Fact Enterprise's activities including the
12 raising of funds from Cameroon native sympathizers across the 50 states of the USA,
13 using interstate transportation and communications, traveling interstate to give
14 speeches, incite support, obtain goods and services for the ADF based operatives in
15 Cameroon, it affected interstate and foreign commerce.

16 **C. RICO Predicate Acts**

17 114. Each Defendant conducted and/or participated in the affairs of ADF and
18 the Association-In-Fact Enterprise through a pattern of racketeering activity,
19 including acts indictable under 18 U.S.C. §2(a) — Aiding, abetting, counseling,
20 commanding, inducing or procuring a federal crime; 18 U.S.C. §371 — Conspiring to
21 commit a federal crime; 18 U.S.C. §2332b — Conspiring to commit an act of
22 terrorism; 18 U.S.C. §2339A - Providing material support to terrorists; 18 U.S.C.
23 §2339C - Prohibitions against the financing of terrorism; without limitation.

24 115. Additional facts, conduct, actions, of Tapang and DOES defendants,
25 including ADF, acting jointly, and in concert with each other, are as noted in the
26 Exhibit A and Exhibit B documents listed with links to the videos, as well as videos
27 listed, with hyperlinks to the videos.

1 **C. RICO Damages**

2 116. Plaintiff has been injured by Defendants’ violation of 18 U.S.C. §
3 1962(c). Defendants caused enormous harm to Plaintiff, as described above. All of
4 these injuries occurred within the United States.

5
6 **FIFTH CAUSE OF ACTION**

7 **FOR RICO CONSPIRACY (18 U.S.C. § 1962(D))**

8 117. Plaintiff re-alleges and incorporates by reference all prior paragraphs of
9 this Complaint and paragraphs in the counts below as though set forth fully herein.

10 118. Defendants conspired with each other to violate 18 U.S.C. § 1962(c).
11 Defendants knowingly agreed, combined, and conspired to conduct the affairs of the
12 Enterprise or the Association-In-Fact Enterprise through ADF operations, Interim
13 Government (“IG”) operations, Southern Cameroons Defense Forces (SOCADEF)
14 operations, and the like. Each Defendant agreed that the operation would involve
15 repeated violations of 18 U.S.C. §2(a) — Aiding, abetting, counseling, commanding,
16 inducing or procuring a federal crime; 18 U.S.C. §371 — Conspiring to commit a
17 federal crime; 18 U.S.C. §2332b — Conspiring to commit an act of terrorism; 18
18 U.S.C. §2339A - Providing material support to terrorists; 18 U.S.C. §2339C -
19 Prohibitions against the financing of terrorism; without limitation Defendants’
20 conspiracy to violate 18 U.S.C. § 1962(c) violated § 1962(d).

21 119. Plaintiffs have been injured by Defendants’ violation of 18 U.S.C. §
22 1962(d). Plaintiffs have been injured by Defendants’ violation of 18 U.S.C. § 1962(c).
23 Defendants caused enormous harm to Plaintiff’s. All of these injuries occurred within
24 the United States.

25 **SIXTH CAUSE OF ACTION**

26 **LIABILITY FOR AIDING AND ABETTING ACTS OF**
27 **INTERNATIONAL TERRORISM PURSUANT TO 18 U.S.C. § 2333(a)**

1 or authorizing acts of international terrorism, including the acts of international
2 terrorism that injured Plaintiffs.

3 127. By aiding and abetting ADF and related armed groups and militia in
4 Cameroon in committing, planning, or authorizing acts of international terrorism,
5 including acts that caused each of the Plaintiffs to be injured in his or her person and
6 property, Defendants are liable pursuant to 18 U.S.C. § 2333(a) and (d) for threefold
7 any and all damages that Plaintiffs have sustained as a result of such injuries, and the
8 costs of this suit, including attorney's fees.

9
10 **SEVENTH CAUSE OF ACTION**
11 **LIABILITY FOR CONSPIRING IN FURTHERANCE OF ACTS OF**
12 **INTERNATIONAL TERRORISM PURSUANT TO 18 U.S.C. § 2333(a)**

13 128. Plaintiffs repeat and re-allege each and every allegation of the foregoing
14 paragraphs as if fully set forth herein.

15 129. Defendant Tapang knowingly agreed, licensed, and permitted ADF and
16 its affiliates to register and use Defendants' platform, Facebook posts, WhatsApp
17 account, twitter, phone communications, financial support, fundraising, conduct,
18 actions, participations, and other services to promote and carry out ADF's activities,
19 including ADF's illegal acts of international terrorism that injured Plaintiffs.

20 130. Defendant Tapang were aware that U.S. federal law prohibited providing
21 material support and resources to, or engaging in transactions with, terrorist
22 organizations and/or engaging in acts constituting international terrorism.

23 131. Defendant Tapang thus conspired with ADF in its illegal provision of
24 Defendants' platform, Facebook posts, WhatsApp account, twitter, phone
25 communications, and conduct, financial support, fundraising, actions, participations
26 other services to promote and carry out ADF's illegal acts of international terrorism,
27 including the acts that injured Plaintiffs.

1 132. By conspiring with ADF in furtherance of ADF's committing, planning,
2 or authorizing acts of international terrorism, including acts that caused each of the
3 Plaintiffs to be injured in his or her person and property, Tapang is liable pursuant to
4 18 U.S.C. § 2333(a) and (d) for threefold any and all damages that Plaintiffs have
5 sustained as a result of such injuries, and the costs of this suit, including attorney's
6 fees.

7
8 **EIGHTH CAUSE OF ACTION**
9 **PROVISION OF MATERIAL SUPPORT TO TERRORISTS**
10 **IN VIOLATION OF 18 U.S.C. § 2339A AND 18 U.S.C. § 2333**

11 133. Plaintiffs repeat and re-allege each and every allegation of the foregoing
12 paragraphs as if fully set forth herein.

13 134. Tapang's conduct of fundraising activities for the ADF, instructions to
14 organize violence in Cameroon, platform, Facebook posts, WhatsApp account,
15 twitter, phone communications, and conduct, financial support, fundraising, actions,
16 participations, other services to promote and carry out, substantially assisted ADF and
17 other armed separatist groups in carrying out its terrorist activities, including
18 recruiting, radicalizing, and instructing terrorists, raising funds, creating fear and
19 carrying out attacks, among other things.

20 135. Through his actions, Tapang has also provided personnel to ADF and
21 related armed separatist groups by making Tapang and his ADF leaders, members,
22 and potential new recruits available to each other for mutual help, assistance,
23 encouragement, sharing of information, services, and expert advice or assistance.

24 136. These services, equipment, and personnel constituted material support
25 and resources pursuant to 18 U.S.C. § 2339A, and they facilitated acts of terrorism in
26 violation of 18 U.S.C. § 2332 that caused the death of Plaintiff's parents and injuries
27 to Plaintiffs.

1 137. Tapang provided these services, equipment, and personnel to ADF and
2 related armed separatist groups, knowing that they were to be used in preparation for,
3 or in carrying out, criminal acts including the acts that injured the Plaintiffs.

4 138. As set forth more fully above, but for the material support and resources
5 provided by Defendants, the attack that injured the Plaintiffs would not have occurred.

6 139. By committing violations of 18 U.S.C. § 2339A that have caused the
7 Plaintiffs to be injured in his or her person, business or property, Defendants are liable
8 pursuant to 18 U.S.C. § 2333 for any and all damages that Plaintiffs have sustained as
9 a result of such injuries.

10
11 **NINTH CAUSE OF ACTION**
12 **NEGLIGENT INFLICTION OF EMOTIONAL DISTRESS**

13 140. Plaintiffs repeat and re-allege each of the foregoing allegations with the
14 same force and effect as if more fully set forth herein.

15 141. Tapang engaged in negligent behavior by providing services, material
16 support, training, expert advice or assistance, personnel, social media platform, other
17 media communications, to ADF and related armed separatist groups.

18 142. Tapang's acts of providing the aforementioned actions to ADF and other
19 armed separatist groups constituted a willful violation of federal statutes, and thus
20 amounted to a willful violation of a statutory standard.

21 143. As a direct, foreseeable and proximate result of the conduct of Tapang as
22 alleged herein above, Plaintiffs has suffered severe emotional distress, and therefore
23 Tapang is liable to the Plaintiffs for Plaintiffs' severe emotional distress and related
24 damages.

25
26 **PRAYER FOR RELIEF**

1 WHEREFORE, Plaintiff demands judgment against Defendants on all Counts,
2 and seeks such relief as specified below for all Counts for which such relief is provided
3 by law:

- 4 a) Awarding Plaintiff damages in an amount to be determined at trial;
- 5 b) Awarding Plaintiff compensatory and treble damages, as available, in an
6 amount to be proven at trial;
- 7 c) Awarding Plaintiff the financial gain earned by Defendants as a consequence
8 of the violations described herein;
- 9 d) Awarding Plaintiff statutory damages, as available;
- 10 e) Awarding Plaintiff punitive damages, as available;
- 11 f) Issuing a **Declaration** that: defendant Tapang's conduct, and that of DOES
12 defendants, and like sympathizers, who assist with providing material support
13 to ADF and similar organization attacks on innocent civilians is a violation of
14 USA ant-terrorism act laws.
- 15 g) Issuing an **Injunction, including a preliminary injunction**: restraining
16 Tapang and his agents, fighters, organization, and those acting in active
17 concert or participation with him from: engaging in conduct as alleged in this
18 Complaint, and principally the material support of terrorism in Cameroon, and
19 including, but not limited to an injunction against engaging in these crimes: 18
20 U.S.C. §2(a) — Aiding, abetting, counseling, commanding, inducing or
21 procuring a federal crime; 18 U.S.C. §371 — Conspiring to commit a federal
22 crime; 18 U.S.C. §2332b — Conspiring to commit an act of terrorism; 18
23 U.S.C. §2339A - Providing material support to terrorists; 18 U.S.C. §2339C -
24 Prohibitions against the financing of terrorism; kidnapping, assault, battery,
25 murder, destruction of property, civilian intimidation and threats, without
26 limitation.

- 1 h) Awarding Plaintiff all costs and attorneys' fees to the full extent permitted
2 under the applicable law;
- 3 i) Awarding Plaintiff pre- and post-judgment interest as permitted by law;
- 4 j) Awarding any other relief as the Court may deem just and proper.
- 5 k) That the Court, *sua sponte*, with its inherent Constitutional and Statutory
6 powers to ensure justice, and to help save lives and pain and sufferings of
7 similar plaintiffs within its jurisdiction:
- 8 a. Refer this matter to the terrorism units of the FBI with jurisdiction over
9 this defendant Tapang who lives and works within the San Jose
10 community, with most persons oblivious to his true person, as his
11 conduct and actions present a clear and present danger of imminent
12 terrorism that harms US citizens, for investigations and assessment
13 consistent with the allegations herein;
- 14 b. Refer this matter to the terrorism units of the California State and local
15 police with jurisdiction over the defendant Tapang, as his conduct and
16 actions present a clear and present danger of terrorism imminent that
17 harms US citizens, for investigations and assessment consistent with the
18 allegations herein;
- 19 c. Refer this defendant Tapang, an immigrant, to the United States
20 Department of Homeland Security ("DHS"), Immigration and Customs
21 Enforcement, and other related DHS agencies, for immediate
22 investigation and assessment to determine whether his conduct and
23 actions present a clear and present danger of imminent terrorism that
24 harms US citizens, for investigations consistent with the allegations
25 herein;
- 26 d. All other actions which this Court deems appropriate to prevent terrorist
27 acts emanating from Tapang harming US citizens and residents.

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on December 26, 2018, I directed that the foregoing document be electronically filed with the Clerk of the Court by using the CM/ECF system, and

(By U.S. Mail) I deposited such envelope in the mail at Los Angeles, CA on December 26, 2018 with postage thereon fully prepaid. I am aware that on motion of the party served, service is presumed invalid if postal cancellation date or postage meter date is more than one day after date of deposit for mailing in affidavit.

Defendant
IVO TANKU TAPANG
5055 DENT AVE APT 97
SAN JOSE, CA 95118-2288

By: _____/S/_____
EMMANUEL NSAHLAI

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EXHIBIT A

**(DOCUMENTS EVIDENCING DEFENDANT TAPANGS POSTS, CONDUCT,
ACTION, PARTICIPATION IN THE MATERIAL SUPPORT OF CRIMES,
VIOLENCE AND INTERNATIONAL TERRORISM IN CAMEROON, FROM HIS
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1	(10) Ivo Tanku Tapang _ LinkedIn	https://www.linkedin.com/in/tapang-ivo-tanku-53898058/	3
2	"Ambazonian" Journalist Summoned By Issa Chiroma – Cameroon News Today-CNT	https://cnt.cm/ambazonian-journalist-summoned-by-issa-chiroma/	10
3	Articles taggés sous « tapang-ivo-tanku »	https://www.237online.com/tag-9855-tapang-ivo-tanku.html	3
4	237 Actu - Cameroun-Crise anglophone _ Un ancien journaliste de la CRTV activement recherché	https://237actu.com/pid/4023	15
5	Ambazonia war_ Red dragons threaten to slaughter Cho Ayaba and Tapang Ivo _ K'mer SAGA	https://www.kmersa.ga/2018/09/ambazonia-war-red-dragons-threaten-to.html	2
6	Battle of words between Ni John and Tapang Ivo turning to something else - Scaresinfo Ltd	https://scaresinfo.com/battle-of-words-between-ni-john-and-tapang-ivo-turning-to-something-else/	10
7	breaking news General Tapang Ivo speaks out bounce back fully you are the most dangerous threat	https://ambaland.com/breaking-news-general-tapang-ivo-speaks-out-bounce-back-fully-you-are-the-most-dange	10
8	BREAKING NEWS! BREAKING NEWS! I can now confirm that tapang ivo Tanku is mad. Yesterday	https://ambaland.com/breaking-news-breaking-news-i-can-now-confirm-that-tapang-ivo-tanku-is-mad-yesterday	5
9	BUSTED!!! How Mark Bareta and Tapang Ivo turned the 'STRUGGLE' into a money making venture	http://kinnakablog.com/2017/05/busted-how-mark-bareta-and-tapang-ivo-turned-the-struggle-into-a-money-making-venture	8
10	Cameroon Anglophone Civil Society Consortium Cacs Vs Ivo Tanku Tapang _ Court Records -	https://unicourt.com/case/tx-hrj-cameroon-anglophone-civil-society-consortium-cacsc-vs-ivo-tanku-tapang-6725	1
11	Cameroon government faces growing insurgency from Anglophone separatists - aminewswire am	https://aminewswire.org/stories/cameroon-government-faces-growing-insurgency-anglophone-separatists/	3
12	Cameroon shut down the internet in anglophone regions like Bamenda, Buea — Quartz Africa	https://qz.com/africa/892433/cameroon-shut-down-the-internet-in-anglophone-regions-like-bamenda-buea/	9
13	Cameroon_ Paul Biya In A State Of Frustration Declares Consortium Leader Tapang Ivo Wanted	http://cameroon-concord.com/headlines/7655-cameroon-paul-biya-in-a-state-of-frustration-declares-consortium	8
14	Cameroon_USA_ Is the FBI Investigating On Ambazonia Activists, Tapang Ivo And Chris Anu	https://actucameroun.com/2018/05/18/cameroon-usa-is-the-fbi-investigating-on-ambazonia-activists-tapang-ivo	2
15	cameroon0718_reportcover_8.5x11_HIGHRES	http://www.hrw.org	68
16	Cameroon-Info.Net__ Cameroon_USA_ Is the FBI Investigating On Ambazonia Activists, Tapang Ivo	http://www.cameroon-info.net/article/cameroonusa-is-the-fbi-investigating-on-ambazonia-activists-tapang-ivo	9
17	CAMEROUN _DEAR FRANCOPHONES - BY TAPANG IVO TANKU - Actu Cameroun	https://actucameroun.com/2016/12/18/cameroun-dear-francophones-by-tapang-ivo-tanku/	3
18	Charges of fraud in Cameroon election _ World _ iowastatedaily.com	http://www.iowastatedaily.com/news/world/charges-of-fraud-in-cameroon-election/article_47ebba46-f346-11e0	2
19	City panicked by wave of suspected ritual killings - CNN	https://edition.cnn.com/2013/01/22/world/africa/cameroon-ritual-killings/index.html	6
20	Crise anglophone au Cameroun _ 79 élèves enlevés dans une école à Bamenda – JeuneAfrique.co	https://www.jeuneafrique.com/658532/politique/crise-anglophone-au-cameroun-pres-de-80-eleves-enlevés-dans	6
21	DEAR FRANCOPHONES – BY TAPANG IVO TANKU - Daily News Cameroon	https://www.dailynewscameroun.com/dear-francophones-by-tapang-ivo-tanku/	5
22	Diverting Anglophone Struggle into goldmine _ How Tapang Ivo&Mark Bareta were caught red-h	https://thehorizonnews.wordpress.com/2017/05/19/diverting-anglophone-struggle-into-goldmine-how-tapang-ivo	3
23	FBI is investigating Ambazonian activists; Tapang Ivo & Chris Anu, for possible arrest and repatriation	http://kamerzine.blogspot.com/2018/05/it-has-been-revealed-that-us-federal.html	2
24	Finally_ I am now an Ambazonian- Tapang Ivo Tanku - BaretaNews	https://www.bareta.news/finally-now-ambazonian-tapang-ivo-tanku/	14
25	From The Desk Of Tapang Ivo Tanku ... President Paul Biya's Soldiers Does The Unthinkable To	http://24.africametros.com/2017/03/from-desk-of-tapang-ivo-tanku-president.html	4
26	Fundraiser for Tapang Ivo Tanku by Tapang Ivo Tanku _ Ngando's Medical Fund	https://www.gofundme.com/2m482cq4	2

27	High Court in Houston, USA finds Tapang Ivo Tanku _GUILTY_ of _EMBEZZLEMENT_ of fur	http://solowayne.com/high-court-in-houston-usa-finds-tapang-ivo-tanku-guilty-of-embezzlement-of-funds-he-co	10
28	Journalist Tapang Ivo Tanku – This Just In - CNN.com Blogs	http://news.blogs.cnn.com/tag/journalist-tapang-ivo-tanku/	7
29	kinnaka's blog □ on Instagram_ “As seen on Facebook! □ _Tapang Ivo Court debacle Well, as an	https://www.instagram.com/p/Bfv5mB8HI_/?hl=en	1
30	Latest breaking news Cameroon, journal cameroun Cameroon daily news _ cameroon daily journa	https://cameroondailyjournal.com/urgent-tapang-ivo-tanku-unity-peace-best-no-scnc-ambazonia-video/	1
31	MARK BARETA & TAPANG IVO Southern Cameroons Independence. AMBA RISE TO FALL	https://cliply.site/video/xecP_FYpfgI	5
32	Men sacrifice a he-goat in order to become bulletproof (photos) ▷ Tuko.co.ke	https://www.tuko.co.ke/251283-men-sacrifice-a-goat-order-bulletproof-photos.html#251283	13
33	Military Court Issues 48 Arrest Warrants For Secessionists	http://www.hotnews-infos.com/military-court-issues-48-arrest-warrants-for-secessionists/	6
34	NEW. TAPANG IVO BIYA'S INTENT - Most Popular Videos	https://novom.ru/en/watch/mCo2FjT8TpA	2
35	NJOBE'S JOURNAL _ BREAKING NEWS_ Consortium banned and Tapang Ivo and Mark Bara	https://njobeserge.blogspot.com/2017/01/breaking-news-consortium-banned-and.html	6
36	Old Tweets_ Tapang_ Ivo (Tapang Ivo Tanku)	https://tweetunnel.com/tapang_ivo	19
37	p12_Layout 1		10
38	pull forth international	https://davistimesnews.blogspot.com/2017/02/the-consortium-tapang-ivo-tanku-has.html	4
39	Southern Cameroons Crisis_ Yaounde plotting to assassinate Mark Bareta, Tapang Ivo – Camero	http://www.cameroonconcordnews.com/southern-cameroons-crisis-yaounde-plotting-to-assassinate-mark-bareta	4
40	State crackdown fuels independence push in Anglophone Cameroon	https://www.reuters.com/article/us-cameroon-politics-separatists/state-crackdown-fuels-independence-push-in-a	6
41	tapang ivo - Free Online Videos Best Movies TV shows - Faceclips	https://www.faceclips.net/rev/tapang%2Bivo	16
42	Tapang Ivo - 免费在线视频最佳电影电视节目- CNClips.Net	https://www.cnclips.net/rev/Tapang+Ivo	17
43	Tapang Ivo & Yannick Sicot on For the winning struggle! Watch.... - Free Our Mother Land Sout	https://www.clipsoon.com/7RmQyHJzOOI/free-our-mother-land-southern-cameroon.html	18
44	TAPANG IVO . PLAN FOR OCTOBER 1ST. - Free Music Clip at Necom	https://necom.co/play-music/mbjOPrGQg7g	4
45	Tapang Ivo Archives - Cameroon Today - Breaking News _ Daily News Updates	http://news.cameroon-today.com/tag/tapang-ivo/	1
46	Tapang Ivo Archives - Journal du Cameroun	https://www.journalducameroun.com/en/tag/tapang-ivo/	5
47	Tapang Ivo debunks video published by an Ambazonia Defense Group Claiming to be _RED DR	http://solowayne.com/tapang-ivo-debunks-video-published-by-an-ambazonia-defense-group-claiming-to-be-red	11
48	Tapang Ivo loses case against High Court in Houston, guilty of misappropriation of funds he col	http://www.betatinz.com/2018/02/tapang-ivo-loses-case-against-high-court-misappropriation-funds.html	4
49	Tapang Ivo tagged videos _ Midnight News	http://newsmdn.com/tag/Tapang-Ivo/CCoQAA	5
50	Tapang Ivo Tanku - @Tapang_Ivo Twitter Profile _ Twipu	http://www.twipu.com/Tapang_Ivo	12
51	Tapang Ivo Tanku – AFN-Africa Fulbright Network	http://www.africafulbright.org/team_member/tapang-ivo-tanku/	2
52	Tapang Ivo Tanku - Google+	https://plus.google.com/106455692770139136632	3
53	Tapang Ivo Tanku - Kamerpedia	http://www.kamerpedia.com/index.php?title=Tapang_Ivo_Tanku	6
54	Tapang Ivo Tanku (@Tapang_Ivo) _ Twitter	https://twitter.com/tapang_ivo?lang=en	5
55	Tapang Ivo Tanku _ CNN Journalist _ Muck Rack	https://muckrack.com/tapang-ivo-tanku	2

56	Tapang Ivo Tanku _ Free Listening on SoundCloud	https://soundcloud.com/tapang-ivo-tanku-1	2
57	Tapang Ivo Tanku _ Official video showing President Trump meeting with non-terrorist.._	http://terrorism.trendolizer.com/2017/09/tapang-ivo-tanku-official-video-showing-president-trump-meeting-wit	34
58	Tapang Ivo Tanku _ SUNY_ University at Buffalo - Academia.edu	http://buffalo.academia.edu/TapangIvoTanku	2
59	Tapang Ivo Tanku _ University at Buffalo, The State University of New York, NY _ SUNY Buffa	https://www.researchgate.net/profile/Tapang_Tanku	2
60	Tapang Ivo Tanku Archives - StraightNews	https://straightnews.ng/tag/tapang-ivo-tanku	6
61	tapang ivo tanku biography Archives - MCMG NEWS	https://www.amba-medias.com/tag/tapang-ivo-tanku-biography/	36
62	tapang ivo tanku latest news – AMBALAND	https://ambaland.com/tag/tapang-ivo-tanku-latest-news/	15
63	tapang ivo tanku latest news - ฟรีวีดิโอออนไลน์ - ดูทีวีออนไลน์ - คลิปวีดิโอฟรี - THClips	https://www.thclips.net/rev/tapang+ivo+tanku+latest+news/	16
64	Tapang Ivo Tanku live with Christoph Hans a pro-Ambazonian - Ambazonia Struggle	https://www.thvideos.net/video/0IgMBudIagE/tapang-ivo-tanku.html	7
65	tapang ivo tanku Most Popular Videos - IcuTube.co	https://icutube.co/src?q=tapang+ivo+tanku	3
66	Tapang Ivo Tanku, le commanditeur des kidnappings de préfets _ Opinions 2017-10-16	https://www.camerounweb.com/CameroonHomePage/features/Tapang-Ivo-Tanku-le-commanditeur-des-kidnap	1
67	Tapang Ivo Tanku. Federation with la Republic is a sell out to the people of Ambaland. – AMBA	https://ambaland.com/tapang-ivo-tanku-federation-with-la-republic-is-a-sell-out-to-the-people-of-ambaland/	7
68	Tapang Ivo Tanku_ UPDATES ON THE KIDNAPPINGS IN AMBAZONIA	https://getlink.pro/youtube/tapang-ivo-tanku-updates-on-the-kidnappings-in-ambazonia	3
69	Tapang ivo Video Download MP4, HD MP4, Full HD, 3GP Format And Watch - MirchiHD.Com	http://mirchihd.com/video/Tapang-ivo	3
70	Tapang Ivo welcomes first child in his family_	https://e-kwat.com/tapang-ivo-welcomes-first-child-in-his-family/	6
71	TAPANG IVO-AMBAZONIA MUST BE FREE DESPITE LRC ADMISSION INTO THE UN H	https://jo.abctube.net/video/F4gf4BSfIqg	5
72	Tension On Social Media Tapang Ivo's Post Of CRTV's Pochi Tamba Sparks Controversies-A N	http://arreyb.com/tension-on-social-media-tapang-ivos-post-of-crtvs-pochi-tamba-sparks-controversies-a-need-f	11
73	TESTIMONIES OF SURVIVORS OF SEX TRAFFICKING SEND SHOCKING WAVES IN CA	http://www.glowacameroon.org/?p=419	2
74	The Anglophone Strike How Far_ - Tapang Ivo Tanku - Самые лучшие видео	https://1-tube.ru/watch/RunF6_YMZ1o	2
75	THE OTHER SIDE OF TAPANG IVO YOU NEVER KNEW - YoutubeDownload.pro	https://youtubedownload.pro/video/NVExMINBUmhURFV6bGFxRIRDeG1UQT09.html	6
76	The Oxford History of Protestant Dissenting Traditions, Volume V_ The ... - Google Books	https://books.google.com.pk/books?id=vrNwDwAAQBAJ&pg=PA366&lpg=PA366&dq=TAPANG+IVO+TAN	1
77	The Story Of Tapang Ivo Tanku and The Bamilike Scammer Sylvie, Enriching Her Life With The	http://www.realinfozones.com/2017/05/the-story-of-tapang-ivo-tanku-and.html	7
78	to be a surprice	https://www.trendsmap.com/twitter/tweet/957034610856099840	3
79	UN chief urges release of kidnapped pupils in Cameroon	https://www.yenisafak.com/en/news/un-chief-urges-release-of-kidnapped-pupils-in-cameroon-3465598	2
80	Un journaliste de la CRTV activement recherché par le FBI _ General News 2018-05-16	https://www.camerounweb.com/CameroonHomePage/NewsArchive/Un-journaliste-de-la-CRTV-activement-rec	1
81	video tapang ivo tanku, clip tapang ivo tanku, dowload video tapang ivo tanku mp3, mp4 - Entert	https://relaxlib.us/categoryel/tapang-ivo-tanku	7
82	vTyoob - TAPANG IVO RELEASE Burn the system that bends the rules! We are close to the fini	https://www.vtyoob.com/video/f1lzFemsJlw	8
83	We are in a war'_ Cameroon unrest confronted by army offensive	https://ewn.co.za/2018/02/09/we-are-in-a-war-cameroon-unrest-confronted-by-army-offensive	3
84	What is Tapang Ivo Tanku's position in regards to this struggle_	https://clip-clip.org/video/Kch7Y0AY4jc/what-is-tapang-ivo-tanku-s-position-in-regards-to-this-struggle.html	5

EXHIBIT B

**(VIDEOS EVIDENCING DEFENDANT TAPANGS CONDUCT, ACTIONS,
PARTICIPATION IN THE MATERIAL SUPPORT OF CRIMES, VIOLENCE AND
INTERNATIONAL TERRORISM IN CAMEROON, FROM HIS RESIDENCE IN THE
USA)**

Sr	youtube link	title	date Published
1	https://www.youtube.com/watch?v=NcG3u5YGulI	TAPANG IVO SPIT FIRE- CARRY THE GAME NOW TO DOUALA & YAOUNDE	18-Nov-18
2	https://www.youtube.com/watch?v=XEv9jFrny8	Tapang Ivo Tanku: UPDATES ON THE KIDNAPPINGS IN AMBAZONIA	Nov 6, 2018
3	https://www.youtube.com/watch?v=1Wvjxb5gpAQ	Tapang Ivo Tanku REVEALED THE KIDNAPPER OF THE 11 STUDENTS IN PSS NK	5-Nov-18
4	https://www.youtube.com/watch?v=KFOanO-D0PI	TAPANG IVO-BAYESA BOYS,Victoria, Buea, Lebialem, Ngie, Muyuka, Santa, Pinyin,	31-May-18
5	https://www.youtube.com/watch?v=FTmbzJhwVQ4	TAPANG IVO response to ERIC TATAW,NALOVA BIH & TALK ABOUT TASSANC	Nov 19, 2018
6	https://www.youtube.com/watch?v=0IgmBudIagE	Tapang Ivo Tanku live with Christoph Hans a pro-Ambazonian - Ambazonia Struggle	Oct 19, 2018
7	https://www.youtube.com/watch?v=mbjOPrGQg7g	TAPANG IVO . PLAN FOR OCTOBER 1ST.	29-Sep-17
8	https://www.youtube.com/watch?v=0moN7nTVsSM	ADF Spokesman Tapang Ivo Tanku Welcomes New Defense groups into the Struggle	13-Sep-18
9	https://www.youtube.com/watch?v=-gMwLFAYzdA	General Tapang Ivo Live Rebroadcast Today August 9th 2018! Watch..	Aug 9, 2018
10	https://www.youtube.com/watch?v=dYUHOKHWcjw	Tapang Ivo YESTERDAY gofundme & TAPANG IVO today RESTORATION.	17-Jul-18
11	https://www.youtube.com/watch?v=583mfrYOqhg	Atam Milan talks on Mark Bareta and Tapang Ivo Tanku	19-Jun-17
12	https://www.youtube.com/watch?v=q_aGTDhS3tc	Ambazonia defense Forces briefings with spokesman Tapang Ivo Tanku	29-Aug-18
13	https://www.youtube.com/watch?v=hM653m0oQrk	Ambazonia Defense Force (ADF) - Ayaba Cho's freedom fighters with General IVO talks	17-Jul-18
14	https://www.youtube.com/watch?v=nWCHhcg-4fU	Tapang Ivo explains why his facebook profile is blocked	25-Dec-16
15	https://www.youtube.com/watch?v=NL9ZzrCuqeA	A Date With Tapang Ivo, Get to Know Him as he talks about the Ambazonian Struggle	Nov 11, 2018
16	https://www.youtube.com/watch?v=qtzMyRrcVZ4	THE OTHER SIDE OF TAPANG IVO YOU NEVER KNEW	Nov 15, 2018
17	https://www.youtube.com/watch?v=YP7j_ZF8uOE	GENERAL TAPANG IVO HIT THE US AMBASSADOR AND BIYA GOVT WITH A	22-May-18
18	https://www.youtube.com/watch?v=-QKfPvDb52E	AYABA AND TAPANG IVO THIS ARE SOME BEAUTIFUL MESSAGE FOR YOU	Sep 26, 2018
19	https://www.youtube.com/watch?v=v2nww2NjG1s	Consortium Officials Dismiss Tapang Ivo and Mark Bara for Gross Misconduct, Threaten	6-Apr-17
20	https://www.youtube.com/watch?v=sRjXE8JH37o	Tapang Tanku on Red Dragons: How To Start & Win A War!	13-May-18
21	https://www.youtube.com/watch?v=0KNqvZfdsZM	Tapang Ivo on I was well recognized in the entire company. I came out # 1! See	Apr 8, 2018
22	https://www.youtube.com/watch?v=KcH7YoAY4jc	What is Tapang Ivo Tanku's position in regards to this struggle?	7-Apr-17
23	https://www.youtube.com/watch?v=u511HKkixMk	Why was Tapang Ivo Tanku taken to court by Theodore CEO of cryOutTV	Mar 1, 2018
24	https://www.youtube.com/watch?v=_4Q8mLyrYR8	TAPANG IVO .AMBAZONIAN STRUGGLE -NEW STRATEGY.LRC PLEASE SURF	3-Sep-18
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26	https://www.youtube.com/watch?v=uFotFkkElmA	Mothers message to Ayaba Cho, Tapang Ivo, Mark Berata as war of words roll	21-Sep-18
27	https://www.youtube.com/watch?v=RunF6_YMZ1o	The Anglophone Strike How Far? - Tapang Ivo Tanku	29-Nov-16
28	https://www.youtube.com/watch?v=0K-tW_g3UpI	Tapang Ivo OUR FREEDOM WILL COME AT ALL COST	4-Mar-18
29	https://www.youtube.com/watch?v=rlzrV_TNN0A	Few months ago, he was on Tapang Ivo Tanku in a very rude way. Today, he took on.....	25-Feb-18
30	https://www.youtube.com/watch?v=Jlz8n1ZYcRE	Part III - Tapang Ivo Tanku "One voice, mixed messages: Anglophone request"	4-Dec-16
31	https://www.youtube.com/watch?v=uccw8mKOFZw&list	CAPTURONS LE CRIMINEL PAUL BIYA MORT OU VIF	Aug 16, 2016
32	https://www.youtube.com/watch?v=RunF6_YMZ1o&list	The Anglophone Strike How Far? - Tapang Ivo Tanku	29-Nov-16
33	https://www.youtube.com/watch?v=bxfnzu1LmDU	ERIC TATAW,TAPANG IVO & MARK BARETA TALK TO AMBAZONIANS & BR	19-Nov-18
34	https://www.youtube.com/watch?v=dtyUoZBpnrg	Part I - Boosting communication and winning propaganda by Tapang Ivo Tanku	6-Jan-17
35	https://www.youtube.com/watch?v=YSMzcOT5dXc	Tapang Ivo Tanku in his usual address to the people of Southern Cameroons	9-Aug-17
36	https://www.youtube.com/watch?v=F4gf4BSf1qg	TAPANG IVO-AMBAZONIA MUST BE FREE DESPITE LRC ADMISSION INTO TH	Oct 15, 2018
37	https://www.youtube.com/watch?v=suLQgS67gkM	urgent TAPANG IVO SPIT FIRE HEAD OF RED DRAGONS AND UPDATE OF THE	Apr 23, 2018

EXHIBIT C

**(DOCUMENTS AND VIDEOS EVIDENCING AMBAZONIA DEFENSE FORCES
ENGAGING IN CRIMES OF TERRORISM, VIOLENCE, KILLINGS, ARSON,
THREATS AND INTIMIDATION AGAINST INNOCENT CAMEROONIAN
CIVILIANS)**

II. Abuses by Armed Separatist Groups

Groups of armed separatists emerged following the government's suppression of the 2016 demonstrations, and gained further support from the diaspora and local communities after the government's heavy-handed response to the September and October 2017 demonstrations.

Many of these groups have a robust following online and appear to be supported by strong diaspora networks in the US, United Kingdom, Nigeria, and South Africa. Some of these foreign-based online activists have since proclaimed themselves to be "commanders" of armed groups and many have used inflammatory and hateful rhetoric against Francophones and government security forces, calling them "dogs," "animals," or "terrorists," accusing them of "genocide," and urging fighters to send them "home to meet their father Lucifer."³⁷

According to the Armed Conflict Location and Event Database (ACLED), an independent media monitor, the pace and scale of attacks by armed separatists against security forces, government workers, and state institutions more than doubled in late 2017 and continued to increase following the January 2018 arrest and deportation of the 47 secessionist activists from Nigeria.³⁸

³⁷ Since the crisis began, online activists living in the US and Belgium, such as Mark Baretta, Nso Foncha Nkem, Ebenzer Akwanga, Ayaba Cho Lucas, and Chris Anu have all used online platforms to urge the diaspora to support armed separatists through fundraising campaigns such as "Adopt a Freedom Fighter" for a minimum of \$75 monthly, or "Feed the Nchang Shoe Boys." In October 2017 for instance, the Maryland-based SCYL chairman, Ebenezer Akwanga published a press release in the League's name, stating that his organization "resolves that it is the right, the legitimate, legal and moral right of the People of the Southern Cameroons to take up arms to defend themselves from a brutal and demonic annexationists Cameroun Republic regime(...)." At a May 2018 conference in Toronto, Canada, Ayaba Cho Lucas also pledged to "take the war into Cameroon if they continue to burn down our villages, we will take the war into the our cities, we will take the war and make them feel the pain that we are feeling." See Facebook page of Ebenezer D. M. Akwanga, <https://www.facebook.com/photo.php?fbid=10214544043091032&set=pb.1119556280.-2207520000.1526897146.&type=3&theater>; Home page of Ambazonia Nchang Shoe Boys, <https://nchangshoeboys.org>; "Adopt a freedom fighter," Federation of Ambazonia, Ambazonia Governing Council, https://www.agcfreeambazonia.org/cms.php?id_cms=93; Facebook page of Ayaba Cho Lucas, <https://www.facebook.com/ayaba.lucas/videos/10215320819909282/>.

³⁸ "Ambazonian Separatists in Cameroon," ACLED, May 5, 2018, <https://www.acleddata.com/2018/05/04/ambazonian-separatists-in-cameroon/>.

How many groups are there?

An independent Cameroonian journalist who has investigated the groups and spoke to Human Rights Watch estimates that between 5 and 20 groups operate in the two regions.³⁹ In a December 2017 statement, the International Crisis Group (ICG) estimated the various groups comprise about 500 fighters in total.⁴⁰ The most militant and well-known groups include:

- The *Ambazonia Defense Forces* (ADF), which emerged in late 2017 under the reported command of Ayaba Cho Lucas, a former Southern Cameroons Youth League activist, now self-styled leader-in-exile and commander-in-chief of the *Ambazonia Governing Council*, operating mostly in the South-West's Mamfe area;
- The Southern Cameroons Defense Forces (SOCADEF), reportedly with a presence in the South-West region's administrative division of Meme and under the control of Ebenezer Akwanga, a former political prisoner now living in the US, and an individual known as "General Molua C";
- The Lebialem Red Dragons, with a reported presence in the South-West's Lebialem division and;
- The Ambazonia Self-Defence Council, created by the putative "Interim Government" in March 2018 and encompassing:
 - The Ambazonia Restoration Army, a militia reportedly under control of General Paxson Agbor, a former police officer;
 - The Tigers of Ambazonia, a militia with a presence in the South-West region's Meme and Manyu divisions;
 - The Southern Cameroons Defense Forces (SCDF), led by Nso Foncha Nkem, an Anglophone Cameroonian who is rumored to have served in the US army, and;

³⁹ Human Rights Watch interview with independent journalist [name withheld], Douala, April 17, 2018.

⁴⁰ "Cameroon's Anglophone crisis: how the Catholic Church can promote dialogue," International Crisis Group press briefing, April 25, 2018, <https://www.crisisgroup.org/africa/central-africa/cameroon/b138-cameroons-anglophone-crisis-how-catholic-church-can-promote-dialogue>.

- The Manyu Ghost Warriors, with a presence in the South-West region's Manyu division.⁴¹

It is unclear how these groups are structured and to what degree they coordinate with one another. An independent journalist, a local civil society activist, and three villagers from two different localities told researchers that some groups have a structure at the local level, with village level commanders appearing to report to regional commanders.⁴²

"It is structured as such that they have a general or a leader for each village," a civil society activist who traveled to areas controlled by armed separatists in March 2018 told Human Rights Watch. "We were stopped at a checkpoint by Ambazonian boys. When I said that I am with an NGO, they pulled me aside. I was questioned and eventually the leader let me go after getting instructions on the phone from someone else," she said.⁴³

The government said that armed separatists have killed over 100 civilians and 84 security forces personnel since the conflict erupted.⁴⁴ While Human Rights Watch has not been able to ascertain the total number of civilian fatalities by armed separatists, witness accounts and credible media reports present strong evidence that civilians

⁴¹ See "Office of the Leader and CIC," Federation of Ambazonia, Ambazonia Governing Council, https://www.agcfreecambazonia.org/cms.php?id_cms=86; "Cameroon's Anglophone crisis: dialogue remains the only viable solution," International Crisis Group statement, December 21, 2017, <https://www.crisisgroup.org/africa/central-africa/cameroon/cameroons-anglophone-crisis-dialogue-remains-only-viable-solution>; Mark Bareta, "The formation of the Ambazonia Self-Defense Council: the first step towards a full-blown Ambazonian army?" Bareta News, March 22, 2018, <https://www.bareta.news/formation-ambazonia-self-defense-council-first-step-towards-full-blown-ambazonian-army/>; "A statement on 'Operations Akando, Dyami and Bimisi' from the desk of the chief of staff, Southern Cameroons Defence Force (SOCADEF)," April 17, 2018, <https://www.facebook.com/photo.php?fbid=10215199459436031&set=pb.1119556280.-2207520000.1530038648.&type=3&theater>; Carlson Anyangwe, *Criminal Law in Cameroon: Specific Offences* (Bamenda: Langaa RPCIG, 2011), <https://books.google.com/books?id=1yj6dQZ4nOYC&printsec=copyright#v=onepage&q&f=false>, p. 107; "About us," the Tigers of Ambazonia, <http://ambatigers.com/about-us>; and "Cameroon: Biya contre les Ambazonies," *Jeune Afrique*, December 5, 2017, <http://www.jeuneafrique.com/mag/498899/politique/cameroun-biya-contre-les-ambazonies/>.

⁴² Human Rights Watch interview with an independent journalist [name withheld], Douala, April 17, 2018; interview with G.A. [name withheld], farmer from Widikum, Bamenda, April 10, 2018; interview with J.M.B. [name withheld], businessman, Kumba, April 14, 2018; interview with A.T. [name withheld], Douala, April 17, 2018; and interview with M.C. [name withheld], businessman, Kumba, April 14, 2018.

⁴³ Human Rights Watch interview with A.T. [name withheld], Douala, April 17, 2018.

⁴⁴ "Government Emergency Humanitarian Assistance Plan in the North-West and South-West Regions 2018-2019," Government of Cameroon, June 20, 2018.

perceived to collaborate with the government have also been targeted by these groups for extortion, torture, and murder.⁴⁵

In the South-West region's Meme division for instance, armed separatists have targeted at least two civilians who hail from the mostly francophone Bamileke ethnic group for kidnapping and extortion. Two Bamileke traders told Human Rights Watch that in February 2018 a group of armed separatists came to one's home and the other's shop and accused them of supporting the government, badly beating one of them. One of the traders recalled:

These youths took me to their chief and he asked if I was Bamileke. I said yes and then he said that they would kill us all. They beat me with their guns and the flat side of a machete. I was on the ground and bleeding. They wanted me to confess that I was a traitor. I refused so they let me go after I gave them money.⁴⁶

In another case, a local civil society activist recounted how she heard from villagers that the armed separatists located in Foe Bakundu executed a man they accused of being an informant in March 2018. "They tortured him and he died," she said.⁴⁷

Attacks on Students, Teachers, and Schools

In November 2016, Anglophone teachers went on strike to protest perceived discrimination against English-speaking teachers and students in the country's education system.

A private school principal told Human Rights Watch he thought the November 2016 strike would only last a few days. "We had a class with [the students] and told them on Monday the 21st, 'Don't come to school because teachers trade union is calling a strike.' We

⁴⁵ Human Rights Watch interview with H.A. [name withheld], Bamenda, April 10, 2018; interview with A.T. [name withheld], Douala, April 17, 2018; and interview with G.A. [name withheld], farmer from Widikum, Bamenda, April 10, 2018. See also "Armed Anglophone Separatists in Cameroon Kidnap 40," VOA, March 18, 2018, <https://www.voanews.com/a/armed-anglophone-separatists-in-cameroon-kidnap-40/4303806.html>, "Head teacher slaughtered by suspected separatists in Etam," Journal du Cameroun, February 21, 2018, <https://www.journalducameroun.com/en/ambazonia-forces-kidnap-gce-board-chair/>.

⁴⁶ Human Rights Watch interview with J.C.M. [name withheld], businessman, Kumba, April 14, 2018.

⁴⁷ Human Rights Watch interview with A.T. [name withheld], Douala, April 17, 2018.

thought that the strike would last one to two days as normal,” he said. “Little did we know that it would last until the situation we have today.”⁴⁸

The majority of teacher unions called off their strike in February 2017.⁴⁹ “We had made our point and we wanted to go back to school,” one union leader involved in the deliberations told Human Rights Watch.⁵⁰ But separatist activists continued to push the local population to refrain from returning their children to school as a tactic to pressure the government.

A teacher told Human Rights Watch: “The general information was that everyone should boycott [schools]. So there were those who were respecting it out of convictions and others respecting it out of fear that something would happen to their children.”⁵¹

Kidnapping of Principals

In 2018, armed separatists abducted at least three principals whose schools had opened.

On the morning of April 30, principal Father William Neba of St. Bede’s College, in Ashing near Belo, North-West region, was reported to have been abducted while celebrating mass with students. He was released two days later. The school suspended classes on the day of the abduction.⁵²

On May 25, 2018, in two separate incidents just days before the start of the national exams, the principal of Government High School Bolifamba Mile 16, Georgiana Enanga

⁴⁸ Human Rights Watch interview with a private school principal [name withheld], Bamenda, April 6, 2018.

⁴⁹ “Teachers call off strike but banned Consortium maintains ghost towns in NW & SW,” Journal du Cameroun, February 19, 2017, <https://www.journalducameroun.com/en/teachers-call-off-strike-banned-consortium-maintains-ghost-towns-nw-sw/>; “Bamenda: teachers Trade Unions Suspend Strike Action,” Cameroon Tribune, February 6, 2017, <https://www.cameroon-tribune.cm/actualites/552/fr/>; Wilson Musa, “Anglophone Crisis: Four Teachers Trade Unions Call Off Strike, Two Refused Signing,” Cameroon-Info.Net, February 4, 2017, <http://www.cameroon-info.net/article/cameroon-anglophone-crisis-four-teachers-trade-unions-call-off-strike-two-refused-signing-281025.html>; Ayeah Emmanuel, “All Anglophones teachers trade unions: call for resumption of classes,” press release issued February 3, 2017, <https://www.cameroon-tribune.cm/articles/5236/fr/>.

⁵⁰ Human Rights Watch interview with a senior teacher and trade union member [name withheld], Bamenda, April 10, 2018.

⁵¹ Human Rights Watch interviews with a teacher [name withheld] who worked at schools in Mezam Division, Bamenda, April 7, 2018, and N.P. [name withheld], a private school principal, Bamenda, April 6, 2018.

⁵² “St. Bede’s College shuts down after kidnap of Principal,” Journal du Cameroun, May 2, 2018, <https://www.journalducameroun.com/en/st-bedes-college-shuts-kidnap-principal/>; “Catholic priest kidnapped in Belo,” Journal de Cameroun, April 30, 2018, <https://www.journalducameroun.com/en/catholic-priest-kidnapped-unknown-men-belo/>; Archdiocese of Bamenda, press release of May 2, 2018.

Sanga, and the principal of Cameroon Baptist Academy Muyuka, Eric Ngomba, were kidnapped.

In a video circulated online, Ngomba is seen sitting on the ground outdoors and surrounded by three armed men pointing weapons at his head as he is questioned. A voice off camera says that Ngomba was detained because he is the principal of a functioning school. The men prompt Ngomba to call on his fellow teachers and principals to close all schools “in this Amba region” and advise his colleagues not to administer the national exams. Both principals were released, Enanga unharmed, Ngomba with machete wounds.⁵³

Attacks on Student and Teacher

Human Rights Watch documented one case in which a teacher was shot in the face in early 2018 in the North-West. A relative said she was found “in a pool of blood” shortly after the attack, adding that “now, she can only communicate by writing. She cannot chew, she can only eat soft food. The wound has not healed.” Her attackers were not identified or apprehended, but the relative explained that “she had received threats before because people were throwing tracts [written threats] at the school and even up to her house.”⁵⁴

In another case documented by Human Rights Watch, Emmanuel Galega, a student, was shot and killed by people believed to be armed separatists who conducted an attack on a high school dormitory in Widikum on March 26, 2018. A man who lived in Widikum at the time of the attack told researchers the armed separatists had conducted two attacks against security forces in the weeks that led to the attack on the school. “People saw [the Ambazonian guys] come to the village that night. They went to the school because they had given information [to close the school] by dropping a note two months earlier. They came and went there and started shooting their guns. One child was shot,” he said.⁵⁵

⁵³ “Cameroon: Armed Separatists Holding School Principal,” Human Rights Watch news release, May 29, 2018, <https://www.hrw.org/news/2018/05/29/cameroon-armed-separatists-holding-school-principal>.

⁵⁴ Human Rights Watch interview with relative of victim [name, date, and location withheld to protect identity].

⁵⁵ Human Rights Watch interview with G.A. [name withheld] from Widikum, Bamenda, April 10, 2018.

Arson Attacks on Schools

Ahead of the resumption of the school year in September 2017, media reported that unknown attackers partially burned over half a dozen schools at night.⁵⁶ The burning of schools, irrespective of their language of instruction, continued in a number of localities throughout late 2017 and early 2018. In June 2018, UNICEF reported that 58 schools had been damaged since the beginning of the crisis in the North-West and South-West regions.⁵⁷

In general, these arson attacks occurred late at night or in the early morning. Claims of responsibility do not appear to have been left at the scene of attacks. However, a media report states that following an arson attack on the Government High School Bafut on May 8, 2018, a note was left calling for no schools to operate.⁵⁸ Government schools, non-denominational private schools, and Catholic, Presbyterian, and Baptist schools have all been targeted for attack.

For example, in one arson attack against the Presbyterian Secondary School Bafut in the early morning of November 1, 2017, three female dormitories for girls were set on fire, and many students lost their belongings in the blaze. A teacher from the school described the scene after the flames were put out, as parents rushed to the school to collect their children: “I could see the roofs of these dormitories were ravaged by fire and had burned down. And the walls of the dormitories were covered in smoke.”⁵⁹

In another case, a father dropping his two children off at their kindergarten in Mezam division, North-West region, in February 2018, discovered that the school’s administrative block had been burned down over the night. The school closed for two weeks after the incident. “The teachers and the pupils are under great fear and panic,” said the father.⁶⁰

⁵⁶ “Cameroon School Set on Fire as Anglophone Strike Deepens.” VOA, August 23, 2017, <https://www.voanews.com/a/cameroon-school-set-fire-anglophone-strike-deepens/3997440.html>.

⁵⁷ “Cameroon: North West/South West: Crisis in the Making – Updated as of 08 June 2018,” UNICEF, June 8, 2018, on file with Human Rights Watch.

⁵⁸ “Armed men attack GHS Bafut,” Journal du Cameroun, May 11, 2018, <https://www.journalducameroun.com/en/armed-men-attack-ghs-bafut/>.

⁵⁹ Human Rights Watch interview with teacher [name withheld] from Presbyterian Secondary School Bafut, Bamenda, April 7, 2018.

⁶⁰ Human Rights Watch interview with father [name withheld] of two children, Bamenda, April 6, 2018.

The administrator of one partially burned school in August 2017 estimated the damage at 5.5 million CFA (US\$9,800), including to school infrastructures, benches, books, and teaching materials.⁶¹ He noted that enrollment dropped from around 325 students to just 77 following the arson attack. “We’ve never closed,” he said, adding, “No matter the crisis, children have a right to education.”⁶²

Threats to Students, Parents, and Teachers

To enforce the boycott, separatist activists began to threaten the lives of teachers and children, and the burning of schools via social media, text messages, and printed notices (referred to locally as “tracts”). The aim was to ensure schools would not reopen or that children would not attend during the 2016-2017 school year, and the first half of the 2017-2018 school year.⁶³

Sometimes the threats have been general, and at other times directed at individual schools, or at named individual educators. In at least one case documented by Human Rights Watch, one principal told researchers that one evening in December 2017 around 11 p.m., rocks covered in petrol were placed under his car and set alight. “The whole house could have burned,” said the principal, as his car was parked in a basement below his house. He had previously received a letter noting that he was a school principal with a demand of 500,000 CFA (\$900) to support the separatist cause.⁶⁴

⁶¹ Human Rights Watch interview with administrator [name withheld] of school in Bui department, Kumbo, April 9, 2018.

⁶² *Ibid.*

⁶³ For example, a threat made to Cameroon Protestant College Bali, posted on Facebook by “Ambazonia freedom fighters,” on August 18, 2017, on file with Human Rights Watch. In another post on Facebook by “Ambazonia freedom fighters,” a school director is identified by name and location and called a “traitor,” on January 13, 2017, on file with Human Rights Watch. We refrain from publishing the URLs as the posts appears intended to scare parents and children from attending school. Facebook was alerted to these posts by Human Rights Watch.

⁶⁴ Human Rights Watch interview with government school teacher [name withheld], Bui division, North-West, April 2, 2018.



Figure 1. A graphic threatening parents and children to boycott schools, circulated on Facebook by “Ambazonia Freedom Fighters,” on August 18, 2017.

As an example of the violent online threats, on September 5, 2017, a group that calls themselves “Ambazonia freedom fighters” posted on Facebook a photo of five identifiable children sitting at school desks, calling them examples of “betrayals,” and urging followers to “stone them.”⁶⁵ See figure 1 for another example of online threats.

Education officials told Human Rights Watch that printed notices were particularly common in late 2017 as some schools prepared to open, or opened, for the 2017-2018 academic year.⁶⁶ The same teachers reported finding such “tracts” left

around towns, near schools, near teacher’s houses, and posted on electricity poles. Although the tracts are generally not signed by any individual or group, teachers we spoke with all attributed them to separatist activists. One example obtained by Human Rights Watch was written by individuals referring to themselves as “We Southern Cameroonians.”⁶⁷

Such threats were often effective. One school administrator of a combined nursery and primary school in Kumbo told Human Rights Watch how one day in the first week of November 2017 there were printed fliers outside the school gate and slipped under the school door reading “Fire! Fire! Fire!” and warning that the school would be burned if it

⁶⁵ Facebook post by “Ambazonia freedom fighters,” September 5, 2017, on file with Human Rights Watch. We refrain from publishing the URL as the post contains both a threat of violence and identifiable children. Facebook was alerted to this post by Human Rights Watch.

⁶⁶ Human Rights Watch interview with a school administrator [name withheld] in Bamenda, April 6, 2018; interviews with teachers in Bamenda, April 6, 2018, in Shishong, April 8, 2018, and in Kumbo, April 8 and 9, 2018.

⁶⁷ This was left at the door of a school administrator with “R.I.P.” written in black pen on the top and bottom of the message. On file with Human Rights Watch.

continued operating. “So we closed the gate, and did not open again until January [2018]. Some students still haven’t come back.”⁶⁸

Negative Consequences for Children’s Education

Either because of these threats, or as a show of solidarity by parents and teachers with the separatist cause, or both, school enrollment levels have dropped precipitously during the crisis.⁶⁹ The majority of the schools across the North-West and South-West regions were closed for most of the academic year of 2016-2017. In May 2018, an estimated 42,500 children were still out of school according to OCHA.⁷⁰

A father told researchers that he was keeping his secondary-school-aged daughter at home. “You hear of a child killed somewhere, of a teacher killed somewhere, of a school burned somewhere. You are not sure of the house you are living,” he said. “I don’t feel safe sending her.... She has been out of school for almost two years.”⁷¹

Some students have diverted to vocational trainings, such as in computers, information technology, sewing, and hairdressing.⁷² But, as multiple educators told Human Rights Watch, many have stopped studying all together and stay at home or work.⁷³ Several interviewees expressed concerns about increasing pregnancy of teenage girls who are out

⁶⁸ The threats contained no name or contact information. The school administrator noted that the school took the threats seriously because other schools had previously been burned. The threat came just two weeks after the school had first reopened since November 2016, “So practically students have lost a whole academic year and some more.” Human Rights Watch interview with school administrator [name withheld] of joint nursery and primary school, Bamenda, April 6, 2018.

⁶⁹ As one school administrator explained, “Some parents [keep their children at home] because of the threats that they’ve had from the Southern Cameroon activists, and some of them it’s because they really are steeped in [the goal].” Human Rights Watch interview with school administrator [name withheld] of schools in Bui division, Kumbo, April 8, 2018.

⁷⁰ UNOCHA, “Emergency response plan – Cameroon North-West and South-West – Summary,” May 2018, https://www.humanitarianresponse.info/sites/www.humanitarianresponse.info/files/documents/files/cmr_nw_sw_fa_2018-05_summary_v07_light.pdf.

⁷¹ Human Rights Watch interview with a father [name withheld], Kumbo, April 9, 2018.

⁷² Human Rights Watch interview with a school administrator [name withheld], Kumbo, April 8, 2018; interview with education NGO worker [name withheld], Bamenda, April 6, 2018; and interview with two fathers [names withheld], Kumbo, April 8 and 9, 2018.

⁷³ Human Rights Watch interviews with a school administrator [name withheld], Kumbo, April 8, 2018, and a school administrator [name withheld] of joint nursery and primary school, Bamenda, April 6, 2018.

of school.⁷⁴ “I saw six of my students are pregnant, they’re aged between 13 and 16,” one teacher from a rural government school told Human Rights Watch.⁷⁵

Some worried that the longer students are out of school, the less likely it is they will return. “Children have tasted small money in jobs...so getting them back to school is going to be so difficult,” said one woman who worked for an NGO concerned with children’s education.⁷⁶

“They don’t want to come to school again,” said the principal of a school that once had an enrollment of 485 students before the crisis, but only 45 when Human Rights Watch visited.⁷⁷ Other educators reported enrollment rates at their schools from 30 to 66 percent of pre-crisis levels.⁷⁸ As of April 2018, some schools were still empty. For example, a school administrator for a number of schools in Bui division told us in April that at two of his schools “not a child has gone to school,” even though they had enrollments of 130 and 75 students prior to the crisis.⁷⁹ A teacher from a rural government school told us her school had enrollment of around 1,000 prior to the crisis, but as of April had only two students in attendance, because they were determined to take the national exams.⁸⁰

⁷⁴ Human Rights Watch interview with an education NGO worker [name withheld], Bamenda, April 6, 2018; interview with an employee of a community development NGO [name withheld], Bamenda, April 6, 2018; interview with tertiary education teacher [name withheld], Kumbo, April 8, 2018; and interview with a teacher who worked at two schools in Mezam division [name withheld], Bamenda, April 7, 2018.

⁷⁵ Human Rights Watch interview with a government secondary school teacher [name withheld], Bamenda, April 10, 2018.

⁷⁶ Human Rights Watch interview with an education NGO worker [name withheld], Bamenda, April 6, 2018.

⁷⁷ Human Rights Watch interview with a government school teacher [name withheld], Bui division, April 2, 2018.

⁷⁸ An administrator from a primary school in Kumbo said that in early 2018 enrollment had climbed to around 200 students, but before the crisis enrollment had been between 600 to 700 students. Another administrator of an urban school that had 1,210 students before the crisis reported 570 students in early April 2018. She said the school reopened in August 2017, and, “We started with five, ten, fifteen students, they were trickling, trickling in.” An administrator of a combined nursery and primary school said his school had just returned to half the enrollment they had before the crisis. A teacher who works at one government school and one Presbyterian school noted that the government school had returned to 180 students, down from 600, meanwhile the other school had more than 800 students, down from pre-crisis enrollment of 1,200 students. The education secretary overseeing Presbyterian schools in the North-West reported that their primary schools had 15,079 students before the crises, and 4,912 by mid-April. The education secretary overseeing Catholic schools in the North-West said that in November 2016 they had 19,599 students registered, but as of April only 6,250. Human Rights Watch interview with an education official [name withheld], Bamenda, April 10, 2018; interview with a school administrator [name withheld], Kumbo, April 8, 2018; interview with a school administrator [name withheld], Bamenda, April 10, 2018; interview with school administrator of joint nursery and primary school [name withheld], Bamenda, April 6, 2018; and WhatsApp message from a Presbyterian education official, April 13, 2018.

⁷⁹ Human Rights Watch interview with a school administrator of schools in Bui division [name withheld], Kumbo, April 8, 2018.

⁸⁰ Human Rights Watch interview with a government secondary school teacher [name withheld], Bamenda, April 10, 2018.

The quality of teaching is also affected. One teacher at a government secondary school told us how she felt returning to a school, where the principal had received a visit from “some boys” who threatened him and told him to close the schools. “Going to teach [the following day] was like a nightmare for me,” she told Human Rights Watch. “I was looking more outside the window and door and not concentrating on teaching because anything could happen.”⁸¹

⁸¹ Human Rights Watch interview with a government secondary school teacher [name withheld], Bamenda, April 10, 2018.

Safe Schools Declaration

Cameroon has not yet endorsed the Safe Schools Declaration, an inter-governmental commitment by countries to better protect students, teachers, schools and universities during times of conflict. Many of its commitments could be relevant to ensure protection of education in the country. In particular, the Declaration encourages:

- The collection of relevant data on attacks on education facilities, on the victims of attacks, and on the military use of schools and universities;
- Investigations of allegations of violations of applicable national and international law and, where appropriate, the prosecution of the responsible perpetrators;
- The development of conflict-sensitive approaches to education;
- Ensuring the continuation of education even during conflict situations;
- The re-establishment of educational facilities; and
- International cooperation and assistance to respond to attacks on education.

In addition, countries that endorse the Safe Schools Declaration commit to use *Guidelines on Protecting Schools and Universities from Military Use during Armed Conflict*, which contain suggestions on how to minimize the potential negative consequences when security forces are deployed to protect schools that have been threatened with attack.

The Peace and Security Council of the African Union (AU) has called upon all AU members states to endorse the Declaration. In November 2017, Cameroon's minister of basic education wrote to the Governor of the Far North calling for respect for the Declaration.

EXHIBIT D

**(EXCERPT FROM HUMAN RIGHTS WATCH REPORT ISBN: 978-1-6231-36352
REPORT TITLED “THESE KILLINGS CAN BE STOPPED”, RELEVANT
PORTIONS “ABUSES BY ARMED SEPARATIST GROUPS” AT PAGES 19
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18	Aftermath of the confrontation between cameroon's military and Secessionist group	https://e-kwat.com/aftermath-of-the-confrontation-between-camerouns-military-and-secessionist-group/	6
19	AMBALAND_ROADMAP_TO_INDEPENDENCE		16
20	Ambazonia - Wikipedia	https://en.wikipedia.org/wiki/Ambazonia	11
21	Ambazonia (1983_Doomsday) _ Alternative History _FANDOM powered by Wikia	http://alhistory.wikia.com/wiki/Ambazonia_(1983:_Doomsday)	3
22	Ambazonia _ Africa Times	https://africatimes.com/tag/ambazonia/	2
23	Ambazonia _ Federal Republic of Southern Cameroon	https://fow.info/Tags/cm_ambaz.html	4
24	Ambazonia Crisis _French Cameroun army opens a Third Front – Cameroon Intelligence Report	http://www.cameroonintelligencereport.com/ambazonia-crisis-french-cameroun-army-opens-a-third-front/	4
25	Ambazonia defence force Archives - The Village Square Journal	https://www.villagesquarejournal.com/tag/ambazonia-defence-force/	2
26	Ambazonia Defence Force deny kidnap of foreigners - Journal du Cameroun	https://www.journalducameroun.com/en/cameroon-sonara-resumes-production/	5
27	Ambazonia Defence Forces – NEWUH'S BLOG	https://newuh.blog/tag/ambazonia-defence-forces/	2
28	Ambazonia Defence Forces - Wikipedia	https://en.wikipedia.org/wiki/Ambazonia_Defence_Forces	1
29	Ambazonia Defence Forces (Southern Cameroons Defence Forces) _ Cameroon _ Terrorist Groups _ TRAC	https://www.trackingterrorism.org/group/ambazonia-defence-forces-southern-camerouns-defence-forces-cameroon	9
30	Ambazonia Defence Forces _ Pan African TV	http://panafricantvonline.com/tag/ambazonia-defence-forces/	2
31	Ambazonia Defence Forces _ Revolve		1
32	Ambazonia defence forces Archives - BaretaNews	https://www.bareta.news/tag/ambazonia-defence-forces/	4
33	Ambazonia Defence Forces claim responsibility for kidnapping government official in Cameroon's Nord-Ouest _Jane's 360	https://www.janes.com/article/78243/ambazonia-defence-forces-claim-responsibility-for-kidnapping-government-official-in-cameroon-s-nord-ouest	2
34	Ambazonia Defence Force ADF's General IVO of Ayabacho – EDUCATING THE PEOPLE 2 – AMBALAND	https://ambaland.com/ambazonia-defence-force-adfs-general-ivo-of-ayabacho-educating-the-people-2/	14
35	Ambazonia Defence Force commander, Cho Ayaba, threatens that Ambazonian Army boys will come to major cities in the French speaking region	http://www.betatanz.com/2018/05/ambazonia-defence-force-anglophobe-crisis-cho-ayaba.html	4
36	Ambazonia Defence Forces (ADF) _ Regional Press Agency	https://apr-news.fr/en/mots-cles/ambazonia-defence-forces-adf	2
37	Ambazonia forces kill Cameroon marine, four para-military officers, kidnap assistant mayor - Army - BBC News Pidgin	https://www.bbc.com/pidgin/tori-45216542	7
38	Ambazonia Governing Council - About	https://www.agesfreeambazonia.org/cms.php?id_cms=71	4
39	Ambazonia Governing Council - La Republique du Cameroun, 1961 to Today	https://www.agesfreeambazonia.org/cms.php?id_cms=16	6
40	Ambazonia lose 21 fighters, two army die for fresh gun battle - BBC News Pidgin	https://www.bbc.com/pidgin/tori-45319282	6
41	#VALUE!	https://ambaland.com/ambazonia-military-council-ame-at-the-front-line-ambazonia-struggle/	16
42	Ambazonia Motorcycle attacks have killed 27 soldiers- Atanga Nji - Journal du Cameroun		5
43	Ambazonia Redemption (@WestCamerouns) _ Twitter	https://twitter.com/westcamerouns?lang=en	9
44	Ambazonia Soldiers on the ground to protect their territory. – Southern Cameroons Community Germany	http://www.scc-g.org/2017/09/16/ambazonia-soldiers-on-the-ground-to-protect-their-territory/	4
45	Ambazonia _Justin Trudeau's Biafra - Canadian Global Affairs Institute	https://www.cgai.ca/ambazonia_justin_trudeau_biafra	16
46	ambazonia+defence+force videos, wetube24.com	https://wetube24.com/search/ambazonia-defence-force	3
47	Ambazonian 'Odeishi' Army Slaughtering LRC Soldiers In Numbers - BaretaNews	https://www.bareta.news/ambazonian-odeishi-army-slaughtering-lrc-soldiers-numbers/	18
48	Ambazonian Defence Forces _ Latest News, Videos and Photos of Ambazonian Defence Forces _ Times of India	https://timesofindia.indiatimes.com/topic/Ambazonian-Defence-Forces	10
49	Ambazonian Forces Order Gov't Officials To Leave Buea _ CameroonPostline	https://cameroonpostline.com/ambazonian-forces-order-govt-officials-to-leave-buea/	4
50	Ambazonian Independence Action Plan Chef Des Ambazonia Defence Forces	https://dailyheralds.org/tag/chef-des-ambazonia-defence-forces	9
51	Ambazonian Separatists in Cameroon _ Aclcd Data	https://www.aclcd.com/2018/05/04/ambazonian-separatists-in-cameroon/	4
52	Ambazonians struggle for independence from Cameroon amid military takeover	https://wagingnonviolence.org/2018/06/ambazonians-struggle-independence-cameroon-military-takeover/	3
53	Ambazonie _Ayuk Tabe oublié, voici le nouveau visage de la sécession _ General News 2018-05-16	https://www.camerounweb.com/CameroonHomePage/NewsArchive/Ambazonie-Ayuk-Tabe-oubl-i-voici-le-nouveau-visage-de-la-scession-439411	2
54	Ambazonie _nomination d'un successeur au Général Ivo _ General News 2018-12-21	https://www.camerounweb.com/CameroonHomePage/NewsArchive/Ambazonie-nomination-d-un-successeur-au-G-neral-Ivo-452948	1
55	Analysing Cameroon's Anglophone Crisis on JSTOR	https://www.jstor.org/stable/26380430?seq=1#metadata_info_tab_contents	4
56	Anglophone Crisis in Cameroon was Decades in the Making	https://www.cfr.org/blog/anglophone-crisis-cameroon-was-decades-making	5
57	Anglophone crisis _Gunmen attack defence minister e convoy - Son Dakika Gündem Haberleri Pidgin	https://gundem.xvz/pidgin/tori-44817531	5
58	Another October 1st 2018 _ cameroon-report.com	https://cameroon-report.com/secure/another-october-1st-2018/	7
59	Anti-War & Militarism News _ Indybay	https://www.indybay.org/antiwar/	11
60	Ärileht - Uudiseid majandusmaailmast - ärileht.ee	http://arileht.delfi.ee/	17
61	Armed conflict in Cameroon's Anglophone region – A2 Global Risk	https://www.a2globalrisk.com/analysis/sub-saharan-africa/camerouns-anglophone-problem-grows-into-an-armed-conflict/	5
62	Army general admits 'Ambazonian fighters not losing the war in Southern Cameroons' – SCBC _ The Voice Of Ambazonia	https://sbcstv.com/army-general-admits-ambazonian-fighters-not-losing-the-war-in-southern-camerouns/	8
63	Army's reaction – The Publisher Nigeria News	http://thepublisherngr.com/category/armys-reaction/	1
64	As Cameroon English Speakers Fight to Break Away, Violence Mounts - The New York Times	https://www.nytimes.com/2018/06/28/world/africa/cameroon-secession.html	7
65	At least 10 killed in heavy fighting between army, separatist - CameroonOnline.org	https://www.cameroononline.org/at-least-10-killed-in-heavy-fighting-between-army-separatist/	2
66	At least 15 killed in Cameroon in clashes between army, separatists _ Reuters	https://www.reuters.com/article/us-cameroon-separatists/at-least-15-killed-in-cameroon-in-clashes-between-army-separatists-idUSKCN1N12VM	4
67	Bamenda Explosions _'Ambazonia Defence Forces Responsible'	http://www.tinzuwei.com/2017/09/bamenda-explosions-ambazonia-defence.html	3
68	Batibo together with Ambazonia Defence Force Hosting the Amba Flag in their Territory - Part 1	https://fr-my.net/watchvideo/batibo-together-with-ambazonia-defence-force-hosting-the-amba-flag-in-their-territory-part-1-wmT-PsyKXt8.html	8
69	Both sides in Cameroon's escalating separatist crisis turn on journalists _ Africa _DW _04.05.2018	https://www.dw.com/en/both-sides-in-camerouns-escalating-separatist-crisis-turn-on-journalists/a-43657021	4

70	BREAKING NEWS FROM (ADF) AMBAZONIA DEFENCE FORCE_ The great General Ivo of ADF Briefing – AMBALAND	https://ambaland.com/breaking-news-from-adf-ambazonia-defence-force-the-great-general-ivo-of-adf-briefing/	8
71	Breaking News Ambazonian army undergoing training Visited by General Ayamba – AMBALAND	https://ambaland.com/breaking-news-ambazonian-army-undergoing-training-visited-by-general-ayamba/	11
72	Breaking News_ Ambazonia Defense forces vow to avenge the death of their comrades - MCMG NEWS	https://www.amba-medias.com/breaking-news-ambazonia-defense-forces-vow-avenge-death-comrades/	38
73	Briefs - Jamestown	https://jamestown.org/program/briefs-295/	4
74	Broadcasting Live - Video - ViLOOK	https://vlookup.com/search/Broadcasting-Live	9
75	Buca-Kumba Highway_ Deadly Clashes Between Military, Ambazonia Forces Leave Travellers Stranded - GlobemediaPress	http://globemediaPress.com/2018/05/07/buca-kumba-highway-deadly-clashes-between-military-ambazonia-forces-leave-travellers-stranded/	5
76	Calaméo - AMBAZONIA PLAN OF ACTION FOR WAR	https://en.calameo.com/books/005580752dc5e6de4c069	11
77	Cameroon_ Crisis Group	https://www.crisisgroup.org/africa/central-africa/cameroon	6
78	Cameroon army denies weekend protests death toll	https://www.gulf-times.com/story/566358/Cameroon-army-denies-weekend-protests-death-toll	2
79	Cameroon army fighting ambazonians after reelection of President Paul Biya	https://chateanews.com/en/2018/10/26/cameroon-army-fighting-ambazonians-after-reelection-of-president-paul-biya/	3
80	Cameroon army frees 18 hostages held in Anglophone region - Premium Times Nigeria	https://www.premiumtimesng.com/foreign/west-africa-foreign/264013-cameroon-army-frees-18-hostages-held-in-anglophone-region.html	8
81	Cameroon army repels attack by 'anglophone separatists' - News24	https://www.news24.com/Africa/News/cameroon-army-repels-attack-by-anglophone-separatists-20171215	6
82	Cameroon army repels attack by 'anglophone separatists'	https://thedefensepost.com/2017/12/15/cameroon-army-repels-separatist-attack/	2
83	Cameroon army, Anglophone separatists have 'Ambazonia' region on lockdown — Quartz Africa	https://qz.com/africa/1410357/cameroon-army-anglophone-separatists-have-ambazonia-region-on-lockdown/	9
84	Cameroon cardinal accuses military of abuses in fight against Anglophone separatists	https://cruxnow.com/global-church/2018/03/14/cameroon-cardinal-accuses-military-of-abuses-in-fight-against-anglophone-separatists/	5
85	Cameroon holiday hit by violence in English-speaking areas	https://www.apnews.com/1d256dcb3c9475db1068b019b975ad6	12
86	Cameroon in angst over 'Ambazonia independence anniversary' Africa_ DW_ 02.10.2018	https://www.dw.com/en/cameroon-in-angst-over-ambazonia-independence-anniversary/a-45712977	4
87	Cameroon Intensifies Military Crackdown On Anglophone Separatists - Sahara Reporters	http://saharareporters.com/2017/12/07/cameroon-intensifies-military-crackdown-anglophone-separatists	12
88	Cameroon kidnaping of 78 school students like Chibok girls — Quartz Africa	https://qz.com/africa/1451665/the-abduction-of-78-school-students-in-cameroons-anglophone-region-could-be-another-chibok/	7
89	Cameroon Making '\$10 Mln a Day' in Crude Oil From English-Speaking Ambazonia - Sputnik International	https://sputniknews.com/analysis/201712201060164631-cameroon-oil-ambazonia-english/	8
90	Cameroon military, separatists blamed for 'grave abuses' - Fox News	https://www.foxnews.com/world/cameroon-military-separatists-blamed-for-grave-abuses	4
91	Cameroon official kidnapped in restive northwest_ report	https://www.france24.com/en/20180226-cameroon-official-kidnapped-restive-northwest-report	3
92	Cameroon on Brink of Civil War as English Speakers Recount 'Unbearable' Horrors - The New York Times	https://www.nytimes.com/2018/10/06/world/africa/cameroon-election-biya-ambazonia.html	10
93	Cameroon rebels issue 'virtual revolutionary currency' - Business Recorder	https://fb.brecorder.com/2018/12/20181226434415/	2
94	Cameroon rebels issue virtual currency to fund independence - Cameroon News - Al Jazeera	https://www.aljazeera.com/news/2018/12/cameroon-rebels-issue-virtual-currency-fund-independence-181224172110496.html	3
95	Cameroon rebels issue 'virtual revolutionary currency' - Daily Mail Online	https://www.dailymail.co.uk/wires/afp/article-6527453/Cameroon-rebels-issue-virtual-revolutionary-currency.html	3
96	Cameroon rebels outgunned in increasingly violent separatist campaign - The National	https://www.thenational.ae/world/africa/cameroon-rebels-outgunned-in-increasingly-violent-separatist-campaign-1.777732	3
97	Cameroon Reveals The Dark Side Of America's 'Train, Advise, And Assist' Missions	https://taskandpurpose.com/cameroon-train-advise-assist-missions/	10
98	Cameroon says armed separatist commander among 4 killed in troubled Anglophone zone - Xinhua - English.news.cn	http://www.xinhuanet.com/english/2018-12/21/c_137690321.htm	2
99	Cameroon says Military Casualties Mounting	https://www.voanews.com/a/cameroon-says-military-casualties-mounting/4456739.html	3
100	Cameroon separatists force army to retreat after face off in Northwest - Africanews	http://www.africanews.com/2018/04/27/cameroon-separatists-force-army-to-retreat-after-face-off-in-northwest/	7
101	Cameroon separatists kidnap 79 students, demand school's closure - dpa International	http://www.dpa-international.com/topic/cameroon-separatists-kidnap-79-students-demand-school-181105-99-679716	1
102	Cameroon separatists kill three soldiers in overnight attack - Africanews	http://www.africanews.com/2018/02/12/cameroon-separatists-kill-three-soldiers-in-overnight-attack/	7
103	Cameroon separatists prepare for guerrilla war - News24	https://www.news24.com/Africa/News/cameroon-separatists-prepare-for-guerrilla-war-20180217	5
104	Cameroon Separatists Threaten to Kill Kidnapped Official	https://www.voanews.com/a/cameroon-separatists-threaten-to-kill-kidnapped-official/4294904.html	2
105	Cameroon troops kill 15 armed separatist fighters in crisis-hit Anglophone region - EUROPE - Chinadaily.com.cn	http://europa.chinadaily.com.cn/a/201809/12/WS5b986a43a31033b4f4655871.html	1
106	Cameroon violence worsens in power struggle over language - Financial Times	https://www.ft.com/content/ca78f75a-bcb9-11e8-8274-55b7292658f4	4
107	Cameroon vs. Ambazonia - Monthly Fatalities Rise Threefold to 151 - Africa Freedom Network	https://africafreedomnetwork.com/blog/cameroon-vs-ambazonia-monthly-fatalities-rise-threefold-to-151/	11
108	Cameroon_ Ambazonia 'commander' killed in Kumba - Journal du Cameroun		4
109	Cameroon_ Anglophone regions gripped by deadly violence - Amnesty International	https://www.amnesty.org/en/latest/news/2018/06/cameroon-anglophone-regions-gripped-by-deadly-violence/	4
110	Cameroon_ At least 15 killed in clashes between army and Ambazonia Defence Forces (ADF) separatists » Wars in the World	https://www.warsintheworld.com/index.php/2018/11/14/cameroon-at-least-15-killed-in-clashes-between-army-and-ambazonia-defence-forces-adf-sepa...	8
111	Cameroon_ Clashes in Nguiti (Southwest region) March 13	https://www.garda.com/crisis24/news-alerts/97361/cameroon-clashes-in-nguiti-southwest-region-march-13	1
112	Cameroon_ General Ambazonie Defense Forces shot down by army - Hot News Africa	https://news-africa.fr/cameroon-general-ambazonie-defense-forces-shot-down-by-army/34695/	2
113	Cameroon_ Horrific violence escalates further in Anglophone regions - Amnesty International	https://www.amnesty.org/en/latest/news/2018/09/cameroon-horrific-violence-escalates-further-in-anglophone-regions/	4
114	Cameroon_ I spent a week embedded with Anglophone armed separatists - Africa - RFI	http://en.rfi.fr/africa/20180614-cameroon-i-spent-week-embedded-anglophone-armed-separatists	3
115	Cameroon_ Separatists kidnap 40 people in Southwest March 17	https://www.garda.com/crisis24/news-alerts/101516/cameroon-separatists-kidnap-40-people-in-southwest-march-17	1
116	Cameroon_ Trekking With 'Ambazonia Defense Forces' - Inside a Separatist War	http://www.webbernew.com/news/cameroon-trekking-with-ambazonia-defense-forces-inside-a-separatist-war	4
117	Cameroon's Anglophone Crisis - Dialogue Remains the Only Viable Solution - Cameroon - ReliefWeb	https://reliefweb.int/report/cameroon/cameroon-s-anglophone-crisis-dialogue-remains-only-viable-solution	3
118	Cameroon's Anglophone War - Analysis - Eurasia Review	https://www.eurasiareview.com/09082018-cameroons-anglophone-war-analysis/	10
119	Cameroon-Election-and-Computational-Propaganda		20
120	Cameroonian Armed Men Abduct Sisiku Ayuk Tabe In Abuja, Ambazonia Secessionist Movement Alleges - News Investigators - Nige	https://newsinvestigatorsng.com/cameroonian-armed-men-abduct-sisiku-ayuktabe-in-abuja-ambazonia-secessionist-movement-alleges/	7
121	Cameroon-Info.Net_ Cameroon - Anglophone Crisis_ Military Kills Ambazonia Commander, Others In Belo Shootouts	http://www.cameroon-info.net/article/cameroon-crise-anglophone-un-general-de-lambazonia-defense-force-tue-par-larmee-332148.html	9
122	Cameroon's Anglophone crisis_ Red Dragons and Tigers - the rebels fighting for independence - BBC News	https://www.bbc.com/news/world-africa-45723211	21
123	Cameroon's Anglophone War, Part 2 - Inside the Separatist Conflict - allAfrica.com	https://allafrica.com/stories/201808140557.html	3
124	Cameroon's church walks line of neutrality amid attacks, possible civil war - National Catholic Reporter	https://www.ncronline.org/news/world/cameroons-church-walks-line-neutrality-amid-attacks-possible-civil-war	17
125	Cameroon's Civil War Intensifies, Casualties Mount - Cameroon - ReliefWeb	https://reliefweb.int/report/cameroon/cameroons-civil-war-intensifies-casualties-mount	2
126	Cameroon's English-speakers call for independence - Cameroon News - Al Jazeera	https://www.aljazeera.com/news/2017/10/17/1001123925310.html	6
127	Cameroon's leader sworn in for 7th term amid rising unrest	http://www.wsfa.com/2018/11/07/cameroon-president-paul-biya-inaugurated-7th-term/	8
128	Cameroon's Military vs Ambazonia Defense Forces	https://www.socialzom.me/videos/watch/1FhdWfHoWg	9
129	Cameroon_ Ambazonia Is World's Youngest State	https://www.modernghana.com/news/865489/cameroon-ambazonia-is-worlds-youngest-state.html	14
130	Cameroon_ de nombreuses divisions fragmentent les séparatistes en zone anglophone - JeuneAfrique.com	https://www.jeuneafrique.com/533245/politique/cameroon-de-nombreuses-divisions-fragmentent-les-separatistes-en-zone-anglophone/	8
131	Cameroon_ En plein DDR_ L'armée abat un combattant sécessionniste et clame avoir tué un Général -	http://www.cameroonvoice.com/news/article-news-36589.html	4
132	Cameroon_ le général des Forces de défense de l'Ambazonie abattu par l'armée - JeuneAfrique.com	https://www.jeuneafrique.com/693934/politique/cameroon-le-general-des-forces-de-defense-de-lambazonie-abattu-par-larmee/	5
133	Cameroon_ le général des Forces de défense de l'Ambazonie abattu par l'armée	https://afriqueenewsinfo.wordpress.com/2018/12/21/cameroon-le-general-des-forces-de-defense-de-lambazonie-abattu-par-larmee/	2
134	Cameroon_Crise anglophone_ Une base « Ambazoniens defence forces » détruite à Bengwi - CAMEROON	http://mail.camer.be/68707/111/cameroon-crise-anglophone-une-base-a-ambazoniens-defence-forces-a-datruite-a-bengwi-cameroon.html	4
135	Cameroon.Crise anglophone_ La fête de Noël a un goût amer à Wum - CAMEROON	https://www.camer.be/72203/111/cameroon-camerooncrise-anglophone-la-fete-de-noel-a-un-gout-amer-a-wum.html	6
136	Cameroon_ L'Éforce adopte un budget de plus de 6 milliards de FCFA - actualité du Cameroun - Agence Cameroun Presse	https://agencecamerounpresse.com/defense/cameroon-%E2%80%99eforce-adopte-un-budget-de-plus-de-6-milliards-de-fcfa.html	8
137	Cameroon_ le commandant des forces de l'Ambazonie abattu par l'armée	https://beninwebtv.com/2018/12/cameroon-le-commandant-des-forces-de-lambazonie-abattu-par-larmee/	3
138	Celebrating Christmas In Tears, Pain And Penury In Cameroon	https://natimesnews.com/2018/12/26/cameroon-national-times-cameroonians-tuesday-december-25-celebrated-the-birth-of-jesus-christ-under-circum...	23
139	Clashes between separatists, army kill at least 10 in Cameroon - Africanews	http://www.africanews.com/2018/10/25/clashes-between-separatists-army-kill-at-least-10-in-cameroon/	9
140	Conflict in Cameroon is extracting a heavy toll on ordinary people - CameroonOnline.org	https://www.cameroononline.org/conflict-in-cameroon-is-extracting-a-heavy-toll-on-ordinary-people/	3
141	Court Slams Ambazonia Impostors 40-Months- Jail Term - CameroonPostline	https://cameroonpostline.com/court-slams-ambazonia-impostors-40-months-jail-term/	4
142	CrisisWatch_ January 2018 - Crisis Group	https://www.crisisgroup.org/crisiswatch/january-2018	49

143	Crowdfunding A Government Uprising In Africa- The Cameroonian 'Kickstarter' Adoption	https://medium.com/@benjaminjdrown/crowdfunding-a-government-uprising-in-africa-the-cameroonian-kickstarter-adoption-54c2d804516e	7
144	Cryptocurrency is Freedom! -- Interview with Ambazonian Secessionists	https://www.ccn.com/crypto/currency-is-freedom-exclusive-interview-with-ambazonian-secessionists/	6
145	Current Vacancies _ Careers _ Defence Forces	http://www.military.ie/careers/current-vacancies/	2
146	Deadly clashes erupt in Cameroon's restive English-speaking region	https://www.france24.com/en/20181114-cameroon-anglophone-deadly-clashes-ambazonia-english-speaking-region	7
147	December 2018 – Ma KONTRI PiPO DEM	http://kontrippo.com/2018/12/	42
148	Defence _ Latest news and updates	https://www.telegraph.co.uk/news/defence/	19
149	Defense _ One Stop Systems	https://www.onestopsystems.com/defense?zclid=CjwKCAIAx4fBRB6EiwA3cV4KkApwRGE-RilRlpZ_38ZpRz19zQilSwvDmqjdnB8mzMnQPnB92ZX...	8
150	Dialogue is Essential to Unite Cameroon's Disparate Voices _ Crisis Group	https://www.crisisgroup.org/africa/central-africa/cameroon/dialogue-essential-unite-cameroons-disparate-voices	17
151	ETembonReport2018		18
152	Exclusive: 'We are in a war' - Cameroon unrest confronted by army offensive _ Reuters	https://www.reuters.com/article/us-cameroon-separatists-exclusive/we-are-in-a-war-cameroon-unrest-confronted-by-army-offensive-idUSKB...	8
153	Fighting Ambazonians _ Cameroon military running own of materials	http://cameroon-concord.com/headlines/fighting-ambazonians-cameroon-military-running-own-of-materials	7
154	Fighting intensifies in the Anglophone region of Cameroon - II manifesto global	https://global.iimanifesto.it/fighting-intensifies-in-the-anglophone-region-of-cameroon/	8
155	Former British Southern Cameroons Journey Towards Complete Decolonization ... - Martin Ayong Ayim - Google Books	https://books.google.com.pk/books?id=1KKw-Pu2Ce4C&pg=PA499&dq=ambazonia+defense+forces&source=bl&ots=iHMDxP_fm&sig...	1
156	Four 'Ambazonia' army training camps exposed [watch video] _ BETA TINZ	http://www.betatinz.com/2017/12/ambazonia-army-training-camps-cameroon-news-anglophone-problem.html	3
157	France and the Ambazonian vigil at Nigerian Embassy in S. Africa - Vanguard News Nigeria	https://www.vanguardngr.com/2018/04/france-ambazonian-vigil-nigerian-embassy-s-africa/	33
158	French people not prepared to be plundered like their former colonies were. _ EU	https://beforeitsnews.com/v3/eu/2018/2643071.html	7
159	General Ivo is Dead – Ma KONTRI PiPO DEM	http://kontrippo.com/the-so-called-general-ivo-is-dead/	15
160	Google News - Cameroon - Latest	https://news.google.com/topics/CAAqIQAQKlnhDOKFTRGdvSUwyMHZNRZlYke0U0FVnVlOUFOAO?hl=en-PK&gl=PK&ccid=PK-en	1
161	Google Actualités - Cameroon - Les plus récents	https://news.google.com/topics/CAAqIQAQKlnhDOKFTRGdvSUwyMHZNRZlYke0U0FVnVlOUFOAO?hl=fr&gl=FR&ccid=FR%3Afr	1
162	Growing Instability in Cameroon Raises Fundamental Questions about the State – Africa Center for Strategic Studies	https://africacenter.org/spotlight/growing-instability-cameroon-raises-fundamental-questions-about-state/	8
163	GTD Search Results	https://www.start.umd.edu/gtd/search/Results.aspx?perpetrator=40770	1
164	History _ Ambazonian Prisoners of Conscience Support Network (APoC-SN)	https://www.ambazoniapocs.net/node/16	7
165	Homage to Ambazonia _ The battle over language has begun in Cameroon _ The Spectator	https://www.spectator.co.uk/2018/10/homage-to-ambazonia-the-battle-over-language-has-begun-in-cameroon/	5
166	Home - CameroonOnline.org	https://www.cameroononline.org/	5
167	Home	https://www.ambazonia.org/en/	5
168	How to Apply _ Applications _ Department of Defence	http://www.defence.gov.au/ADFA/Applications/Apply.asp	1
169	How, at age 26, I made enough money for a \$179,000 car in just 4 months on the Bitcoin crash	http://sweeps9114.ttt-time82.live/0500253008/?u=gmjk605&co=55hpyz&t=main7&t=1	11
170	https://www.ambazonia.org/en/		7
171	Human Rights In English Speaking Regions _ Amnesty Drops The Hammer on Cameroon - Pan African Visions	https://news.panafricanvisions.com/2018/amnesty-drops-hammer-cameroon-report-recommendations-discussed-senior-officials-presidency-ilaria-alle...	11
172	If Cameroon becomes another Rwanda, we all pay the price _ Christian News on Christian Today	https://www.christiantoday.com/article/if-cameroon-becomes-another-rwanda-we-all-pay-the-price/127149.html	1
173	In Nigeria, Anglophone Cameroonians turn to low paid labour _ Cameroon _ Al Jazeera	https://www.aljazeera.com/indepth/features/nigeria-anglophone-cameroonians-turn-paid-labour-180801222453208.html	11
174	Inside Cameroon's bloody war over the English language – VICE News	https://news.vice.com/en_us/article/qvauj3/inside-cameroons-bloody-war-over-the-english-language	10
175	IRIN _ Cameroon's anglophone war, part 1 _ A rifle as the only way out	https://www.irinnews.org/special-report/2018/06/12/cameroon-s-anglophone-war-part-1-rifle-only-way-out	17
176	IRIN _ Cameroon's anglophone war, part 2 _ Inside the separatist conflict	https://www.irinnews.org/special-report/2018/08/02/cameroon-s-anglophone-war-part-2-inside-separatist-conflict	10
177	Kracka Kornhole Khaos _ African American News	https://beforeitsnews.com/v3/african-american-news/2018/2462557.html	4
178	L'AMBAZONIA DEFENSE FORCE DIFFUSE UNE VIDÉO DU SOUS PRÉFET DE BATIBO(vidéo)! – LA VÉRITÉ SUR LE CAMEROU	https://vslcam.com/2018/03/15/lambazonia-defense-force-diffuse-un-video-du-sous-prefet-de-batibovideo/	6
179	Latest breaking news Cameroon _ journal cameroun Cameroon daily news _ cameroon daily journal	https://cameroondailyjournal.com/ambazonia-heavy-fighting-between-military-and-ambazonians-look-place-in-ndopbaba-i-and-bamessing-the-whole-o...	5
180	Latest news about Ambazonia Defence Force from Nigeria and world _ TODAY.NG	https://www.today.ng/topic/ambazonia-defence-force	6
181	Le chef de la milice sécessionniste anglophone tué par l'armée camerounaise	https://www.voafrique.com/a/le-chef-de-la-milice-s%C3%A9cessionniste-anglophone-tu%C3%A9-par-l-arm%C3%A9e-camerounaise/4710919.htm	1
182	Le général des Forces de défense de l'Ambazonie abattu par l'armée - Actu Cameroon	https://actu.cameroon.com/2018/12/21/le-general-des-forces-de-defense-de-lambazonie-abattu-par-larmee/	2
183	Life In A War Zone _ 30 Days in Ambazonia _Anglophone Cameroon (4) - Pan African Visions	https://www.panafricanvisions.com/2018/life-war-zone-30-days-ambazoniaanglophone-cameroon-4/	10
184	Long Live Ambazonia _ English-Speaking Rebels Want to Create New Nation in Africa - Sputnik International	https://sputniknews.com/africa/2017/12/151060033802-ambazonia-cameroon-english-speaking/	12
185	Macron, Cameroon and the Shrine	https://www.thenigerianvoice.com/news/267928/macron-cameroon-and-the-shrine.html	7
186	Mgr Samuel Kléda «Nous voulons qu'il y ait un dialogue réel pour résoudre la crise anglophone» - actualité du Cameroun - Agence Cameroon	https://agencecamerounpresse.com/defense/mgr-samuel-kl%C3%A9da-%C2%A9nous-voulons-qu%27e2%80%99il-y-ait-un-dialogue-r%C3%A9el-pour...	6
187	Military burns old mother in Muamu, shoots dead two in Buea, Ambazonia Scare, and gunshots on October 1st - Promptness and objectivity	http://mimimefainfos.com/2018/10/02/october-1-one-dies-in-buea-ambazonia-scare-military-raid-and-gunshots/	14
188	Military Tools for ArcGIS _ ArcGIS Solutions for Defense	https://solutions.arcgis.com/defense/help/military-tools/	5
189	News _Ambazonia Defence Forces, force Cameroon army to retreat after face off. _ Biafra24 Radio	http://biafra24.com/newsambazonia-defence-forces-force-cameroon-army-to-retreat-after-face-off-9137/	1
190	Nigeria police arrests 39 suspected members of the Ambazonia Defense Force – Cameroon Intelligence Report	http://www.cameroonintelligence.com/nigeria-police-arrests-39-suspected-members-of-the-ambazonia-defence-force/	4
191	On Kosovo IMF Board Offers Praise Without Meeting UNlike UN Security Council Which Heard of 100% Taxes and Army	http://www.innerecitypress.com/imf/kosovo121818.html	16
192	OPINION _ Ambazonia Fighters And The Story of _ Issakaba - Cameroon News Agency	http://cameroonnewsagency.com/opinion-ambazonia-fighters-and-the-story-of-issakaba/	11
193	Panic as Paul Biya Plans to Visit Beau in 'Ambazonia' _ Aprenon - The African Progressive Economist	https://www.theafricanprogressiveeconomist.com/panic-as-paul-biya-plans-to-visit-beau-in-ambazonia/news-desk/	4
194	Panic in LRC, as Ambazonia Defence Forces Strike Hard - Abakwa Times - Online News Publication - Woodbury, Minnesota	http://www.abakwatimes.com/panic-in-lrc-as-ambazonia-defence-forces-strike-hard	4
195	Paul Biya _ Confusion In _ambazonia _ _ CAMEROON BLOG	https://cameroonblog.info/2018/06/09/confusion-in-ambazonia/	11
196	Paul Biya _ How Armed Secessionist Groups Are Forcefully Recruiting Minors _ CAMEROON BLOG	https://cameroonblog.info/2018/07/05/how-armed-secessionist-groups-are-forcefully-recruiting-minors/	11
197	Peace and Conflict in Africa - Google Books	https://books.google.com.pk/books?id=nw5jDgAAOBAJ&pg=PT220&pg=PT220&dq=ambazonia+military+force&source=bl&ots=Ni-BWY7cyO&sig=O...	1
198	Petition - UNITED NATIONS _ SOUTHERN CAMEROONS (AMBAZONIA) LIBERATION MOVEMENT (SOCALIMO) FOR ANGLOPH	https://www.change.org/p/united-nations-southern-cameroons-ambazonia-liberation-movement-socalimo-for-anglophone-independence-0d8bffe-f87...	19
199	Picking a Fight _ The Rise of Armed Separatists in Cameroon _ Acted Data	https://www.acladata.com/2018/09/21/picking-a-fight-the-rise-of-armed-separatists-in-cameroon/	8
200	President cracks down on, shuts Anglophone universities	https://www.universityworldnews.com/post.php?story=20171010121644957	7