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Date: 01/01/19

### FBI – SAN FRANCISCO/SAN JOSE OFFICE ATTENTION: SPECIAL AGENT IN CHARGE, JOHN F. BENNET

450 Golden Gate Avenue, 13th Floor San Francisco, CA 94102-9523

### **VIA CERTIFIED MAIL**

RE: <u>REPORT OF POSSIBLE FEDERAL CRIMES – INCLUDING</u>
<u>VIOLATIONS OF TERRORISM LAWS – AGAINST **IVO TANKU TAPANG**,
<u>AND REQUEST FOR AN INVESTIGATION</u>.</u>

Date of Incident: October 2016 to present.

#### Dear Mr. Bennet:

On behalf of certain victims, U.S. citizens and residents of Cameroon origin, whose parents, siblings, children have been killed, maimed, tortured, property burnt, and for others, their children prevented from going to school for the past two years, we hereby submit this tip/report/complaint against **IVO TANKU TAPANG** who, upon information and belief, is committing multiple terrorism and other federal crimes from his residence in San Jose, California, listed below:

#### A. VIOLATIONS

On information and belief, Mr. Tapang has committed the following violations, without limitation:

1. "International terrorism," according to 18 U.S.C. § 2331 as "activities that involve acts or acts dangerous to human life that are in violation of the criminal



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laws of the United States or of any State, that would be a criminal violation if committed within the jurisdiction of the United States or of any State."

- 2. 18 U.S.C. §2(a) Aiding, abetting, counseling, commanding, inducing or procuring a federal crime;
  - 3. 18 U.S.C. §371 Conspiring to commit a federal crime;
  - 4. 18 U.S.C. §2332b Conspiring to commit an act of terrorism;
  - 5. 18 U.S.C. §2339A Providing material support to terrorists;
  - 6. 18 U.S.C. §2339C Prohibitions against the financing of terrorism;
- 7. CA Penal Code §31 Accomplice liability Aiding and Abetting Law;
- 8. CA Penal Code §182 Criminal Conspiracy (to crimes of murder, kidnappings, arson, assault, battery, without limitation)
- 9. CA Penal Code §32 Accessory after the fact (to crimes of murder, kidnappings, arson, assault, battery, without limitation)
- 10. Other crimes, including accessory before the fact, murder, kidnapping, arson, robbery, assault and battery, inciting and promoting violence and terrorist acts on foreign citizens and seeking the overthrow of a foreign government using force and war.

### **B. FACTS ESTABLISHING PROBABLE CAUSE**

We have attached as **Exhibits A and B**, charts comprising documentary evidence, captions and video links of conduct and actions of Mr. Tapang, where he admits being the spokesperson of the Ambazonia Defense Forces ("ADF"), and engages in conduct and actions constituting "material support" (as defined by the Supreme Court of the United States, "material support" means providing "training", "expert advice or assistance", "service" or "personnel" to armed organizations) of terrorism that harms parents, siblings, children and other families of US citizens of Cameroon origin. Mr. Tapang, as evidenced in these videos, provides "expert advice" "service" "training" and "personnel" to the ADF on how to intimidate civilians into submission, carry out killings, terrorize innocent civilians in hotels and students in dormitories in the French speaking regions of Cameroon, burn down houses of those who do not cooperate and other atrocities. The videos are indisputable evidence, with Mr. Tapang personally bragging and boasting of his criminal actions and accomplishments and giving direct orders to his ADF fighters and followers.



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Mr. Tapang is the official spokesperson of the ADF. We have attached as **Exhibits C** and **D** certain documentary evidence as well as videos which illustrate the killings, torturing, destruction of property, arson, maiming, cutting hands of government workers and students, destruction of roads, and other actions that the ADF has engaged in, meeting the definition of terrorism and criminality. Mr. Tapang has aided and abetted the ADF in all these acts, by advising them on what actions to take, providing them with fund raising activities and financial support, providing them with a platform to air their views and propaganda via his Facebook page, providing them with personnel, both administrative and fighters, to execute their missions. The brutal actions and atrocities committed by the ADF are well documented by credible news organizations such as the BBC, RFI, Reuters, Amnesty International. Attached as Exhibit B to this report are selected links to documentary videos and evidence of the terrorist and criminal acts of the ADF.

Additional specific material support of crimes, terrorism, and aiding and abetting in a long laundry list of federal crimes which, upon information and belief, is committed by Mr. Tapang includes:

- 1. Fund raising for the ADF and related armed militia organizations whose official conduct and policies are all crimes under USA laws
- 2. Using his Facebook posts to provide instructions on strategy, policy, and ADF regulations
- 3. Recruiting of fighters
- 4. Assistance with procuring and providing weapons, equipment, and other tangible materials.
- 5. Coordination with other separatists' groups abroad and in Cameroon
- 6. Leadership of the ADF in the USA
- 7. Expert advice and assistance on how to obtain separation by violence and force and war from Cameroon
- 8. Assistance with the training of ADF fighters
- 9. Using other social media such as email, twitter, skype, WhatsApp to promote ADF violent agenda, plan the dates and times of attacks, and other activities in violation of USA laws.
- 10.Intimidation, threats, and killings of anyone who opposes their goal of secession; and so, on and forth.



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## C. PAIN AND SUFFERINGS INFLICTED UPON THOUSANDS OF US CITIZENS OF CAMEROON ORIGIN DUE TO THE DIRECT ACTIONS OF MR. TAPANG AND THE ADF

According to most reputable organizations such as Amnesty International, Human Rights Watch, or the International Crisis Groups, it is estimated as of December 2017, that the Amazonian conflict in Cameroon – which we report as being directly caused, incited, participated, materially supported by the actions of Mr. Tapang and his ADF, acting in a joint venture, aiding and abetting each other, acting in agency - has resulted in over 500 civilians who have died in the violence, and the United Nations counts 30,000 Cameroon Anglophone refugees in Nigeria and 437,000 internally displaced in Cameroon. An incredible half a million Cameroonians are suffering a life of daily assaults and threats, fear and persecution, living in hiding and abject misery, poverty, and despondency, away from their homes, due to the actions and conduct of Mr. Tapang, and his ADF and related organizations.

The United States citizens victims we represent, as well as thousands of US citizens of Cameroon origin residing in the USA, wake up each morning, checking their phones, their WhatsApp messages, and fearing the worst, always likely to happen: families and friends kidnapped for ransom, silenced into submission with threats on their persons and lives, killings of family members, and other atrocities. Without the material support Tapang provides to the ADF, which he readily admits and consistently boasts about on his social media platform (see exhibits attached), resulting in the verifiable massacres noted and documented by reputable organizations such as Amnesty International, US citizens of Cameroon origin would not have this daily anguish, pain and suffering, and feeling terrorized and helpless.

It is against this backdrop that we humbly request an investigation into the actions and conduct of Mr. Tapang which we believe constitutes material support of terrorism, as well as a long laundry list of federal crimes, partially listed above, which he commits from his residence in San Jose, California, and causing unimaginable pain to thousands of US citizens of Cameroon origin, as well as pain, anguish and sufferings to millions of Cameroonians.

We thank you in advance for your anticipated professional courtesy and cooperation.



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Enclosures:

Exhibits A, B, C, D ( as stated )

Very truly yours,

Nsahlai Law Firm

Emmanuel/Isahlai

By: \_\_\_\_

Emmanuel Nsahlai

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# EXHIBIT A

(DOCUMENTS EVIDENCING DEFENDANT TAPANGS POSTS, CONDUCT, ACTION, PARTICIPATION IN THE <u>MATERIAL SUPPORT</u> OF CRIMES, VIOLENCE AND INTERNATIONAL TERRORISM IN CAMEROON, FROM HIS RESIDENCE IN THE USA )

#### Tables

Sr# Description	link	no of pag
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 recherch	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
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7 breaking news General Tapang Ivo speaks out bounce back fully you are the most dangerous thre	https://ambaland.com/breaking-news-general-tapang-ivo-speaks-out-bounce-back-fully-you-are-the-most-danger	10
8 BREAKING NEWS! BREAKING NEWS! I can now confirm that tapang ivo Tanku is mad. Yest	https://ambaland.com/breaking-news-breaking-newsi-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 ve	http://kinnakasblog.com/2017/05/busted-how-mark-bareta-and-tapang-ivo-turned-the-struggle-into-a-money-ma	8
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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/Bfv5mB8Hl/?hl=en	1
30 Latest breaking news Cameroon, journal cameroun Cameroon daily news _ cameroon daily journal	a 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 FALI	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
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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
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69 Tapang ivo Video Download MP4, HD MP4, Full HD, 3GP Format And Watch - MirchiHD.Com	http://mirchihd.com/video/Tapang-ivo	3
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71 TAPANG IVO-AMBAZONIA MUST BE FREE DESPITE LRC ADMISSION INTO THE UN H	https://jo.abctube.net/video/F4gf4BSf1qg	5
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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
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# EXHIBIT B

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

Sr y	outube link	title	date	Publish	ed
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Sr	youtube link	uue	date Published
1	https://www.youtube.com/watch?v=NcG3u5YGulI	TAPANG IVO SPIT FIRE- CARRY THE GAME NOW TO DOUALA & YAOUNDE	18-Nov-18
		Tapang Ivo Tanku: UPDATES ON THE KIDNAPPINGS IN AMBAZONIA	
2	https://www.youtube.com/watch?v=XEv9jFrfny8		Nov 6, 2018
3	https://www.youtube.com/watch?v=1Wvjxb5gpAQ	Tapang Ivo Tanku REVEALED THE KIDNAPPER OF THE 11 STUDENTS IN PSS NE	5-Nov-18
4	https://www.youtube.com/watch?v=KFQanO-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 TASSANO	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 7	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=u511HKkjxMk	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
25	https://www.youtube.com/watch?v=QbSr8QbCOFg	Mothers message to Ayaba Cho, Tapang Ivo, Mark Berata as war of words roll	Sep 21, 2018
26	https://www.youtube.com/watch?v=uFotFkkEImA	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
		Few months ago, he was on Tapang Ivo Tanku in a very rude way. Today, he took	
29	https://www.youtube.com/watch?v=rlzrV_TNN0A	on	25-Feb-18
-	https://www.youtube.com/watch?v=JIz8n1ZYcRE	Part III - Tapang Ivo Tanku "One voice, mixed messages: Anglophone request"	4-Dec-16
			Aug 16, 2016
-	https://www.youtube.com/watch?v=RunF6_YMZ1o&list=		29-Nov-16
	https://www.youtube.com/watch?v=bxfnzu1LmDU	ERIC TATAW, TAPANG IVO & MARK BARETA TALK TO AMBAZONIANS & BRI	19-Nov-18
-	https://www.youtube.com/watch?v=dtyUoZBpnrg	Part I - Boosting communication and winning propaganda by Tapang Ivo Tanku	6-Jan-17
	https://www.youtube.com/watch?v=YSMzcOT5dXc	Tapang Ivo Tanku in his usual address to the people of Southern Cameroons	9-Aug-17
-	https://www.youtube.com/watch?v=F4gf4BSf1qg	TAPANG IVO-AMBAZONIA MUST BE FREE DESPITE LRC ADMISSION INTO TH	Oct 15, 2018
		urgent TAPANG IVO SPIT FIRE HEAD OF RED DRAGONS AND UPDATE OF THE	Apr 23, 2018
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# 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."<sup>37</sup>

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.<sup>38</sup>

<sup>37</sup> Since the crisis began, online activists living in the US and Belgium, such as Mark Bareta, 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/.

<sup>&</sup>lt;sup>38</sup> "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.<sup>39</sup> In a December 2017 statement, the International Crisis Group (ICG) estimated the various groups comprise about 500 fighters in total.<sup>40</sup> 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;

<sup>&</sup>lt;sup>39</sup> Human Rights Watch interview with independent journalist [name withheld], Douala, April 17, 2018.

<sup>&</sup>lt;sup>40</sup> "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.<sup>41</sup>

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

<sup>41</sup> See "Office of the Leader and CIC," Federation of Ambazonia, Ambazonia Governing Council, https://www.agcfreeambazonia.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-anglo phone-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 "Cameroun: Biya contre les Ambazones," Jeune Afrique, December 5, 2017, http://www.jeuneafrique.com/mag/498899/politique/cameroun-biya-contre-les-ambazones/.

<sup>&</sup>lt;sup>42</sup> 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.

<sup>&</sup>lt;sup>43</sup> Human Rights Watch interview with A.T. [name withheld], Douala, April 17, 2018.

<sup>&</sup>lt;sup>44</sup> "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

<sup>45</sup> 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.voan.ews.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/.

<sup>&</sup>lt;sup>46</sup> Human Rights Watch interview with J.C.M. [name withheld], businessman, Kumba, April 14, 2018.

<sup>47</sup> 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.<sup>52</sup>

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

<sup>&</sup>lt;sup>48</sup> Human Rights Watch interview with a private school principal [name withheld], Bamenda, April 6, 2018.

<sup>49 &</sup>quot;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/.

<sup>&</sup>lt;sup>50</sup> Human Rights Watch interview with a senior teacher and trade union member [name withheld], Bamenda, April 10, 2018. <sup>51</sup> 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.

<sup>52 &</sup>quot;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.<sup>53</sup>

# 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

<sup>&</sup>lt;sup>53</sup> "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.

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

<sup>55</sup> 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.<sup>56</sup> 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.<sup>57</sup>

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. 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

<sup>&</sup>lt;sup>56</sup> "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.

<sup>&</sup>lt;sup>57</sup> "Cameroon: North West/South West: Crisis in the Making – Updated as of o8 June 2018," UNICEF, June 8, 2018, on file with Human Rights Watch.

<sup>&</sup>lt;sup>58</sup> "Armed men attack GHS Bafut," Journal du Cameroun, May 11, 2018, https://www.journalducameroun.com/en/armed-men-attack-ghs-bafut/.

<sup>&</sup>lt;sup>59</sup> Human Rights Watch interview with teacher [name withheld] from Presbyterian Secondary School Bafut, Bamenda, April 7, 2018.

<sup>&</sup>lt;sup>60</sup> 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.<sup>61</sup> 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."<sup>62</sup>

## 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.<sup>63</sup>

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.<sup>64</sup>

<sup>&</sup>lt;sup>61</sup> Human Rights Watch interview with administrator [name withheld] of school in Bui department, Kumbo, April 9, 2018.

<sup>63</sup> 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.

<sup>&</sup>lt;sup>64</sup> 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." 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.<sup>66</sup> 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."

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

<sup>&</sup>lt;sup>65</sup> 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.

<sup>&</sup>lt;sup>66</sup> 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.

<sup>&</sup>lt;sup>67</sup> 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.<sup>69</sup> 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.<sup>70</sup>

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."

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

<sup>68</sup> 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.

<sup>&</sup>lt;sup>69</sup> 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.

<sup>7</sup>º UNOCHA, "Emergency response plan – Cameroon North-West and South-West – Summary," May 2018, https://www.humanitarianresponse.info/files/documents/files/cmr\_nw\_sw\_fa\_2018-05\_summary\_vo7\_light.pdf.

 $<sup>^{71}</sup>$  Human Rights Watch interview with a father [name withheld], Kumbo, April 9, 2018.

<sup>&</sup>lt;sup>72</sup> 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.

<sup>&</sup>lt;sup>73</sup> 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.<sup>76</sup>

"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." Other educators reported enrollment rates at their schools from 30 to 66 percent of pre-crises levels. 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. 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. So

<sup>74</sup> 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.

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

<sup>&</sup>lt;sup>76</sup> Human Rights Watch interview with an education NGO worker [name withheld]. Bamenda, April 6, 2018.

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

<sup>78</sup> 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-crises 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.

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

<sup>&</sup>lt;sup>80</sup> 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

<sup>&</sup>lt;sup>81</sup> 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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