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Seeking Justice for Victims in Darfur: The Darfur Legal Training Program

Genevieve A. Cox*

Jerome C. Roth†

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Abstract

With relatives displaced from their homes and a fiancée who was arbitrarily imprisoned and abused in Darfur, Hayat comes to her work with victims in the refugee camps with a personal stake. ... This commitment to human rights defense and victims' advocacy led Hanifa and eight of his Sudanese colleagues to the Darfur Legal Training Program (the "Program"), a first-of-its-kind seminar in June of 2007 led by the American Bar Association Litigation Section (the "Section"), with funding from the MacArthur Foundation. ... The Program brought these lawyers to London for a week to train with a faculty of American trial lawyers and representatives of the International Criminal Court ("ICC") on advocacy skills, victims' rights and resources, and international human rights law. ... The Sudanese lawyers now look to the ICC to administer justice on behalf of the Darfur victims, but they question if the Court can redress the millions of crimes that have occurred in Darfur—a concern highlighted by the ICC Prosecutor's initial indictment, which accused only two defendants of crimes alleged to have occurred in four villages. ... Even recognizing the limitations of the ICC and the Sudanese legal system, however, the Sudanese lawyers are unwavering in their position that justice must be delivered to all of the Darfur victims, and the crimes against those victims must be acknowledged before there can be reconciliation in the Sudan. ... The participants in the Darfur Legal Training Program were men and women lawyers from throughout Sudan—all of whom have joined Salih in dedicating their careers to defending victims and challenging government oppression and atrocities. ... The Darfur Legal Training Program was designed to meet this specific need, by forging an unprecedented connection between those lawyers working on the ground in Sudan with Darfur victims, and the institution tasked with the investigation and prosecution of crimes against humanity and war crimes in Darfur. ... In story after story, the Sudanese lawyers shared the futility and tragic similarities of their repeated efforts on behalf of Darfur rape victims in the Sudan: each case brought on behalf of victims was quickly defeated as a result of government pressure.

ESSAYS

SEEKING JUSTICE FOR VICTIMS IN DARFUR: THE DARFUR LEGAL TRAINING PROGRAM

*Genevieve A. Cox & Jerome C. Roth**

INTRODUCTION

Before he knew his clients as victims, Abu Hanifa Zein Elabdin Abdulatief knew them as his community, his neighbors, his family, and his friends. Hanifa is a lawyer in Darfur, Sudan, the western region inhabited by the Fur tribe.¹ For the past four years, the region has been the scene of relentless violence, rape, mass displacement, and genocidal massacre at the hands of both government troops and nomadic militia known as the Janjaweed.² “Sometimes when I think about what has happened to Darfur, my country, it brings tears to my eyes,” he says.³

Hanifa’s legal career was molded by his own gut-wrenching experiences, which he characterized as just “a simple story” out of “thousands of miserable stories in Sudan, so many that no

* A shorter version of this article was published previously. See Genevieve A. Cox & Jerome C. Roth, *Crisis in Darfur: Sudanese Lawyers Look To the International Criminal Court*, S.F. ATT’Y, Fall 2007, at 27.

1. See HUMAN RIGHTS WATCH [HRW], TARGETING THE FUR: MASS KILLINGS IN DARFUR 4-6 (2005), available at <http://www.hrw.org/background/africa/darfur0105/darfur0105.pdf> (describing geography of Darfur and areas inhabited by Fur tribe and outlining historical conflicts between agricultural Fur tribe and nomadic people of Arab ethnicity); see also HRW, DARFUR 2007: CHAOS BY DESIGN, PEACEKEEPING CHALLENGES FOR AMIS AND UNAMID 12 (2007), available at <http://hrw.org/reports/2007/sudan0907/sudan0907web.pdf> [hereinafter HRW DARFUR 2007] (illustrating populations affected by violence through map of Darfur).

2. See e.g., HRW DARFUR 2007, *supra* note 1, at 3 (summarizing armed conflict in Darfur, and outlining role that Sudanese government and Janjaweed play in perpetuating violence); UNITED NATIONS DEP’T OF PUB. INFO., FACT SHEET: THE UNITED NATIONS AND DARFUR (2007), available at <http://www.un.org/geninfo/faq/factsheets/UNandDarfur.pdf> (estimating that more than 200,000 people have died and 2 million have been displaced since fighting broke out in 2003); see also Jeffrey Gettleman, *Reports of New Massacre Surface in Southern Darfur*, N.Y. TIMES, Oct. 17, 2007, at A13 (reporting that violence has expanded into other areas of Darfur).

3. See Genevieve A. Cox & Jerome C. Roth, *Crisis in Darfur: Sudanese Lawyers Look To the International Criminal Court*, S.F. ATT’Y, Fall 2007, at 27, 27.

human can grasp.”⁴ In 2005, as Hanifa explained, he was seized from his home in the middle of the night, taken without explanation to a government detention center, and repeatedly threatened and interrogated.⁵ He saw his fellow detainees hung upside down and whipped on the soles of their feet, and spent three days in a small detention room next to the corpse of another captive, as he and fellow prisoners were beaten.⁶ After his release, Hanifa rededicated himself to advocacy on behalf of victims of the Darfur tragedy.⁷

This commitment to human rights defense and victims’ advocacy led Hanifa and eight of his Sudanese colleagues to the Darfur Legal Training Program (the “Program”), a first-of-its-kind seminar in June of 2007 led by the American Bar Association Litigation Section (the “Section”), with funding from the MacArthur Foundation.⁸ The Program brought these lawyers to London for a week to train with a faculty of American trial lawyers and representatives of the International Criminal Court (“ICC”) on advocacy skills, victims’ rights and resources, and international human rights law.

Through this Program, the Section hoped to bring together, in a way that had not been done previously, lawyers serving Darfur victims with the only court where they may pursue the recognition of those victims’ rights. But the Program’s value was in no way limited to what the American lawyers and ICC representatives were able to teach the advocates from the Sudan. To the contrary, the Program gave these lawyers an opportunity to share their experiences and perspectives on justice for Darfur victims with an international audience able to help bring about that justice.

In each of these discussions, the same themes and calls for justice emerged from the Sudanese lawyers. They emphasized that millions of men, women and children have been devastated by crimes against humanity in Darfur, and that regardless of the strength of the evidence of these crimes, cases brought in Suda-

4. *Id.*

5. *See id.*

6. *See id.*

7. *See* Interview with Abu Hanifa Zein Elabdin Abdulatief, in London, Eng. (June 4-9, 2007).

8. *See* Eric Pfanner, *Sudanese Lawyers Receive Guidance for Possible Trials Over Darfur*, N.Y. TIMES, June 6, 2007, at A5.

nese courts on behalf of these victims have universally failed—usually due to government influence or judicial corruption. The Sudanese lawyers now look to the ICC to administer justice on behalf of the Darfur victims, but they question if the Court can redress the millions of crimes that have occurred in Darfur—a concern highlighted by the ICC Prosecutor’s initial indictment, which accused only two defendants of crimes alleged to have occurred in four villages.⁹ Even recognizing the limitations of the ICC and the Sudanese legal system, however, the Sudanese lawyers are unwavering in their position that justice must be delivered to all of the Darfur victims, and the crimes against those victims must be acknowledged before there can be reconciliation in the Sudan.

A success of the Darfur Legal Training Program, therefore, was allowing the Sudanese lawyers to voice these concerns and prompting the American lawyers and ICC representatives to incorporate these perspectives into their efforts on behalf of Darfur victims. This Essay attempts to capture the Sudanese lawyers’ perspective.

I. *THE DARFUR LEGAL TRAINING PROGRAM: PURPOSE, GOALS, AND DESIGN*

The Darfur Legal Training Program was inspired by Sudanese lawyer, renowned human rights activist, and parliament member Salih Mahmoud Osman.¹⁰ Like his nephew, Hanifa, Salih belongs to the Fur tribe. Salih has made a career of providing free legal aid to victims of human rights abuses in Sudan, but his work took on new significance when those victims became his fellow tribe members. Passionate and committed, Salih has emerged as an inspired leader within Darfur. “I come from a family that has responsibilities always, and we have been there working for the interests of our people,” Salih explained.¹¹ This responsibility brings with it great personal sacrifice. Although

9. See *Prosecutor v. Ahmad Muhammad Harur & Ali Muhammad Ali Abd-Al-Rahman*, Case No. ICC-02/05-01/07, Decision on the Prosecution Application under Art. 58(7) of the Statute, ¶ 4 (Apr. 27, 2007).

10. See News Release, Am. Bar Ass’n Section of Litig., ABA Section of Litigation to Provide Advocacy Training to Sudanese Lawyers (May 16, 2007), available at http://www.abanet.org/abanet/media/release/news_release.cfm?releaseid=130 [hereinafter ABA News Release]; see also Cox & Roth, *supra* note 3, at 28.

11. Interview with Salih M.M. Osman, in London, Eng. (June 4-9, 2007).

never charged with an offense, Salih has been arrested three times—and was once imprisoned for several months and subjected to torture and interrogation by the government.¹² This occurred, Salih said, “because I have been voicing out for the suffering.”¹³

As shown by Hanifa’s commitment, Salih’s voice is fortunately not the only one advocating on behalf of victims in Darfur. The participants in the Darfur Legal Training Program were men and women lawyers from throughout Sudan—all of whom have joined Salih in dedicating their careers to defending victims and challenging government oppression and atrocities.¹⁴ In recent years, the efforts of these lawyers, many of whom descend from the so-called “Arab” tribes rather than the “non-Arab” tribes that have been persecuted, have been focused on Darfur—not only through work within that region, but also through advocacy and activism in other parts of the Sudan where Darfur refugees remain a vulnerable population.

Outside of the Sudan, earlier this year, the ICC Prosecutor filed charges and obtained arrest warrants for a Sudanese government minister, Ahmad Muhammed Harun, and a Janjaweed senior militia leader, Ali Kushayb, accusing each of committing crimes against humanity and war crimes in their coordination of attacks on Darfur.¹⁵ Despite confirmation of the charges by the ICC Pretrial Chamber,¹⁶ Sudan has resisted turning over the defendants, asserting that they should be prosecuted in domestic courts.¹⁷ This resistance has stalled the prosecution, which requires the presence of the defendants, and also endangers the jurisdiction of the Court, which can only hear cases that domestic courts are unable or unwilling to prosecute.¹⁸

As the path to justice for Darfur victims moves away from

12. *See id.*

13. *Id.*

14. *See generally* Cox & Roth, *supra* note 3.

15. *See* Prosecutor v. Ahmad Muhammad Harun & Ali Muhammad Ali Abd-Al-Rahman, Case No. ICC-02/05-01/07, Decision on the Prosecution Application under Art. 58(7) of the Statute, ¶ 4 (Apr. 27, 2007).

16. *See id.* ¶¶ 80-107.

17. *Sudan Not Cooperating on Arrests of War Crimes Suspects, Says Prosecutor*, U.N. NEWS CENTRE, Aug. 28, 2007, <http://www.un.org/apps/news/story.asp?NewsID=23625&Cr=sudan&Cr1=icc#>.

18. Rome Statue of the International Criminal Court arts. 17, 63, July 17, 1998, 2187 U.N.T.S. 90 [hereinafter Rome Statute] (entered into force July 1, 2002).

failed domestic courts and towards the ICC, the need arises for Sudanese lawyers to become familiar with its system. Because ICC procedures provide for participation in all stages of proceedings by victims and their counsel (including determining whether a case is admissible),¹⁹ there is the potential for Sudanese lawyers to play an active role in obtaining redress for their fellow citizens. The ICC's founding charter, the Rome Statute, creates certain rights for victims, including the right to be represented by counsel and participate and present evidence as part of the proceedings, as well as the right for victims and witnesses to access the ICC's protective and security resources and to seek reparations.²⁰ Although the Sudanese lawyer participants were skilled in documenting and challenging government abuses, many had not traveled outside of Africa and had little familiarity with these ICC procedures, international human rights law, or trial advocacy skills.

The Darfur Legal Training Program was designed to meet this specific need, by forging an unprecedented connection between those lawyers working on the ground in Sudan with Darfur victims, and the institution tasked with the investigation and prosecution of crimes against humanity and war crimes in Darfur. The curriculum for the Program was designed to arm the Sudanese lawyers with information regarding practice before and victims' rights provided by the ICC, but also to allow these lawyers to tell their stories to an international audience.²¹

That audience not only included lawyers from the United States—such as former assistant U.S. Attorneys, a former International Criminal Tribunal for Yugoslavia prosecutor, a United States federal judge, and experienced trial lawyers and advocacy educators—but also representatives of every division of the ICC. On each day of the Program, the Sudanese lawyers seized the opportunity to debate and comment on the Darfur prosecution with ICC leadership, including the Chiefs of the ICC's Office of Public Counsel for Victims and Victims' Participation and Reparations Unit, as well as an experienced ICC prosecutor and former defense counsel.

19. International Criminal Court, Rules of Procedure and Evidence, R. 91, ICC-ASP/1/3 (Sept. 3, 2002) [hereinafter ICC Rules].

20. See, e.g., Rome Statute, *supra* note 18, arts. 15(3), 68(3); ICC Rules, *supra* note 19, R. 50, 86, 90, 92.

21. See ABA News Release, *supra* note 10.

II. FROM THE SUDANESE LAWYERS: THE CHALLENGES OF PRACTICE IN THE SUDAN

Unimpeded and frank dialogue between the Sudanese lawyers, the ICC representatives, and American faculty became the hallmark of the Program. Although the American lawyers and ICC representatives offered a comprehensive presentation on the ICC—its purpose, rules, benefits and shortcomings—only the Sudanese lawyers could convey the realities of Darfur.

For example, the widespread use of rape as a weapon of war in Darfur has been documented and publicized,²² but only the Sudanese could personalize those statistics. In story after story, the Sudanese lawyers shared the futility and tragic similarities of their repeated efforts on behalf of Darfur rape victims in the Sudan: each case brought on behalf of victims was quickly defeated as a result of government pressure. Salih explained that rape in Darfur—often inflicted upon children and in front of relatives of the victims—“was meant to humiliate the people.”²³ And from the judge who resolved a rape prosecution by reconciling and marrying the rape victim to her abusive captor, to the doctor who, conducting an examination under the watch of the National Security Forces, denied that the victim had been raped despite clear physical evidence that she had been beaten, raped and tortured, the Sudanese lawyers offered no shortage of stories of grave injustice against women in Darfur.

In stark contrast to the prevalence of rape, the Sudanese lawyers explained that prosecution rarely occurs because Sudanese law is crafted to disfavor victims.²⁴ They emphasized that, under Sudanese law, prosecution of rape requires corroborative testimony from four male eyewitnesses, and if the victim fails to make this showing, she risks being prosecuted for adultery and sex outside of marriage—crimes punished harshly in the Su-

22. See Justin Wagner, *The Systematic Use Of Rape As A Tool Of War In Darfur: A Blueprint For International War Crimes Prosecutions*, 37 GEO. J. INT'L L. 193, 202-09 (2005); Becky Tinsley, *Why The World Is Ignoring Darfur: The Genocide In Sudan Has Come And Gone From The World's Headlines, But Persists All The Same*, NEW INTERNATIONALIST MAG., Oct. 1, 2005, at 30; Emily Wax, *We Want to Make a Light Baby: Arab Militiamen in Sudan Said to Use Rape as Weapon of Ethnic Cleansing*, WASH. POST, June 30, 2004, at A01.

23. Interview with Salih M.M. Osman, *supra* note 11.

24. Office of the High Commissioner for Human Rights [OHCHR], *Access to Justice for Victims of Sexual Violence*, ¶¶ 35-37 n.6 (July 29, 2005), available at <http://www.ohchr.org/Documents/Countries/darfur29july05.pdf> [hereinafter OHCHR Report]; see also Wagner *supra* note 22, at 209.

dan.²⁵ As a result, though there have been countless rapes and other sexual and gender-based violence against women and girls in Darfur, the Sudanese lawyers claimed that only seven convictions for rape have ever been obtained.²⁶ Salih explained: “We have 500 cases of rape that never got any successful conviction, because we don’t have the evidence, except in one case, when the accused himself confessed that he committed that crime. That is the only way.”²⁷ No hope of justice was voiced by the Sudanese lawyers for rape victims within the national courts.

Similarly, no action in Sudanese courts could be taken to resolve the overwhelming crisis of forcible displacement—a crime which the Sudanese lawyers emphasized has millions of victims and no apparent resolution. “You cannot talk about reconciliation, I think, unless people go back to their communities,” Salih commented.²⁸

Notwithstanding such formidable obstacles, the Sudanese lawyers continue to document rape and other crimes against Darfur victims, and to advocate prosecution, even at great personal risk. Hytham Ismaiel Matar, a solo practitioner who represents rape victims in Darfur, described how he remains constantly on guard and often must hide outside the city to continue his legal work in cases involving government soldiers.²⁹ Still, Hytham has more refugee clients than he can represent and continues his work on human rights cases. “It is for the hope and the future that I represent . . . the victims, I keep going,” he says.³⁰

This perseverance symbolizes a greater commitment to legal action in Darfur. In fact, many of the lawyers would not accept the possibility of reconciliation without justice: “If the peace will come, it is most important to have punishment for the people who commit the crimes. We need justice first,” says Hayat Musa Suliman, a female lawyer from Darfur who documents abuse within the refugee camps.³¹ With relatives displaced from their

25. See OHCHR Report, *supra* note 24, ¶¶ 35-37 n.6; see also Wagner, *supra* note 22, at 209.

26. See Wagner, *supra* note 22, at 209; Colum Lynch, *U.N. Report Details Rampant Sexual Violence in Darfur*, WASH. POST, July 29, 2005, at A20.

27. Interview with Salih M.M. Osman, *supra* note 11.

28. *Id.*

29. Interview with Hytham Ismaiel Matar, in London, Eng. (June 4-9, 2007).

30. *Id.*

31. Interview with Hayat Musa Suliman, in London, Eng. (June 4-9, 2007).

homes and a fiancé who was arbitrarily imprisoned and abused in Darfur, Hayat comes to her work with victims in the refugee camps with a personal stake. Beyond the abuse victims suffer, Hayat has also witnessed the devastation wreaked by camp life on refugee families and their hope for the future. Hayat recalled a father so destroyed by his family's losses and life in the camp that he lost his mind and tortured his young daughter. "[A]ll the people in Darfur, they lost their confidence, the confidence in the government . . . any confidence," explains Hayat.³² "All of them hope for peace, but it is very difficult," and many, says Hayat, place what hope remains in the ICC.³³

III. WILL THE INTERNATIONAL CRIMINAL COURT
ADMINISTER JUSTICE TO DARFUR VICTIMS? THE SUDANESE
LAWYERS VOICE HOPE, BUT ALSO FRUSTRATION,
WITH THE PROSECUTOR'S FIRST STEPS

Finding that justice is unavailable within their crippled domestic court system, the Sudanese lawyers believe that the ICC may present a better opportunity. But a consensus emerged from the Darfur Legal Training Program that the ICC must be armed with international authority and additional resources if it is to effectively carry out its mission of justice.

At present, the lawyers agreed that the ICC's authority appears most threatened by Sudan's failure to comply with arrest warrants issued by the ICC for two defendants alleged to have committed crimes against humanity and war crimes in Darfur. Sudan's resistance to these warrants has stalled the prosecution, which requires the presence of the defendant,³⁴ and also endangers the jurisdiction of the Court, which can only hear cases that domestic courts are unable or unwilling to prosecute.³⁵

The Sudanese lawyers expressed skepticism at their country's claim that the Special Criminal Court for Events in Darfur—the court Sudan created to prosecute those defendants targeted by the ICC³⁶—could ever substitute for the interna-

32. *Id.*

33. *Id.*

34. See Rome Statute, *supra* note 18, art. 63.

35. See *id.* art. 17.

36. See HRW, LACK OF CONVICTION: THE SPECIAL CRIMINAL COURT ON THE EVENTS IN DARFUR 5 (2006), available at <http://www.hrw.org/backgrounder/ij/sudan0606/sudan0606.pdf>.

tional tribunal. The lawyers are working to document the failures of this and other local courts in preparation for the looming jurisdictional battle over this issue. There is no question, however, in Salih's mind that Sudanese courts are government-controlled and thus incapable of remedying what he describes as the "atmosphere of impunity" that remains in Darfur: "Our judicial system is unable and unwilling to provide justice. This is why we think that only the ICC is the competent international criminal tribunal to bring justice [to] those [that] are still beyond the reach of our laws."³⁷

For the ICC to effectively stand in where domestic courts have failed, however, the Sudanese lawyers asserted that the current indictment must be broadened substantially. At present, the charging document is extremely limited: it targets only two defendants regarding crimes that occurred in four villages, and scarcely begins to redress the hundreds of thousands—and perhaps, millions—of other crimes that have occurred in Darfur.³⁸ Sudanese lawyers also expressed frustration at the type of crimes charged (excluding genocide), and the defendants, who they characterized as "mid-level" perpetrators, rather than the individuals responsible for carrying out the crimes. There was also a concern that the limited focus could also restrict the number of victims who have the right to reparations post-conviction.

The Sudanese lawyers recognized that Darfur victims must balance realism about the ICC's capabilities, given its lack of resources and incomplete international support, against their desire for justice and for deterrence. "We are realistic that the ICC will not take all the cases, because there are hundreds of thousands of cases, and the ICC has only a very limited capacity to deal with the situation there," reasoned Salih.³⁹ "But we do think that it will also give satisfaction to the victims if ten or fifteen of the notorious perpetrators are brought to justice in front of the ICC."⁴⁰

Salih's insistence that justice must come to the Sudan before there could be reconciliation was echoed by all of the

37. Interview with Salih M.M. Osman, *supra* note 11.

38. See Prosecutor v. Ahmad Muhammad Harur & Ali Muhammad Ali Abd-Al-Rahman, Case No. ICC-02/05-01/07, Decision on the Prosecution Application under Art. 58(7) of the Statute, ¶ 4 (Apr. 27, 2007).

39. Interview with Salih M.M. Osman, *supra* note 11.

40. *Id.*

participating lawyers. “No peace until the ICC punishes the person who commits the crimes against humanitarians,” explained Hayat, describing a sentiment she said was shared by the people of Darfur.⁴¹ “No justice now in Darfur; no peace in Darfur. Firstly, justice, and after that, maybe the feeling is that peace will come.”⁴²

If Sudanese courts cannot provide this essential “justice,” can—or should—the ICC fulfill this important responsibility? This question was much discussed by the participants at the Darfur Legal Training Program, but left unanswered. Certainly, the participants acknowledged that it would be difficult to extend the ICC’s limited resources to address the seemingly boundless number of crimes that have occurred in Darfur. At the same time, however, they were unwilling to accept a conservative, narrow prosecution that would exclude the majority of victims and allow the majority of perpetrators to go unpunished.

Expressing gratitude for the contribution of individuals to end the Darfur crisis, Salih expressed dissatisfaction with this lack of resources and what he perceives as the slow response of governments:

People at one time said, “We cannot allow Rwanda to happen.” Unfortunately, all the states know about the genocide or the war crimes or the human suffering that is occurring today [in Darfur], but they don’t take steps. . . . We do believe that there is always this moral and ethical responsibility to protect lives, to save lives, when the situation is as serious as it is in Darfur. We sometimes feel that we have been let down by the international community.⁴³

Uncertain about the future, Sudanese lawyers continue to peg their hopes on international action, as they continue to work to change the situation within Darfur. Gabar Abdella Meki, a lawyer from Darfur, described his commitment to victims as an unquestionable “duty”: “Justice is very difficult in Sudan and very difficult in Khartoum. But we have to do our duty.”⁴⁴ Hala Mohamed Abdelhaliem, a lawyer who also was the first female to found and lead a political party in Sudan, put the senti-

41. Interview with Hayat Musa Suliman, *supra* note 31.

42. *Id.*

43. Interview with Salih M.M. Osman, *supra* note 11.

44. Interview with Gabar Abdella Meki, in London, Eng. (June 4-9, 2007).

ment even more simply: "I don't feel human if I can't defend the human rights. It's like human motivation, like dignity."⁴⁵ Others amongst these lawyers work for a higher goal; Sohair Ahmed Abdella, a female lawyer not from the Darfur region, commits her practice to helping victims as part of a desire to bring peace to the Sudan:

All the time, I am interested about human rights. I think anybody hates the war. Nobody loves the war. Peace is better for Darfur, and it is a gift from God, peace. . . . So we work hard—all of us work very hard—to get the government to stop this war so all people can live in peace.⁴⁶

Even against such obstacles, hope for the future remains in these lawyers. "We are hopeful all the time, because this problem is not concerning me, as it concerns everyone," explained Hanifa.⁴⁷ "The international community is concerned about what's happening in Darfur. So because the international community is supporting me, I feel hopeful. So there is no hopelessness."⁴⁸

45. Interview with Hala Mohamed Abdelhaliem, in London, Eng. (June 4-9, 2007).

46. Interview with Sohair Ahmed Abdella, in London, Eng. (June 4-9, 2007).

47. Interview with Abu Hanifa Zein Elabdin Abdulatief, *supra* note 7.

48. *Id.*