

MESSAGE AS MEDIUM IN SIERRA LEONE

*Diane Marie Amann**

*We attacked everybody.
We feared nobody.
We were very bold.
Everybody is knowing our tempers.*

This virtual haiku of war comes from a fellow named Josep Sonah, whom a Boston Globe report described as a nineteen-year-old veteran of the Sierra Leone civil war.¹ Sonah's four statements reflect the reasons that the nearly decade-old war in Sierra Leone has become notorious among armed conflicts.

We attacked everybody: The campaign, particularly that of the Revolutionary United Front (RUF), the most significant of several rebel groups, was a campaign of terror against civilians. It included arson, mutilation, and summary executions. An estimated 20,000 persons were abducted, and many have never been returned to their homes. Some were impressed into labor, others used as human shields. There were systematic rapes, numbering in the thousands, of girls as young as five, women as old as seventy-five. The displacement of a million people, one-quarter of the country's population. And the hallmark of this conflict, the chopping off of the hands of those said to have cast votes for President Ahmed Tejan Kabbah in 1996.²

We were very bold: Sierra Leone is known for the use of child soldiers, many of whom also were child victims. Estimates of the number of child soldiers range between 5,000 and 10,000. One-tenth of the rebels who waged a devastating assault on Sierra Leone's capital, Freetown, in January 1999 are believed to have been children. Children were recruited by both sides of the conflict, by pro-government militias and by rebels. At nineteen, Josep Sonah

* Professor of Law, University of California, Davis; B.S., 1979, University of Illinois; M.A., 1981, University of California, Los Angeles; J.D., 1986, Northwestern University. I wish to thank Gwen K. Young for invaluable research assistance. These remarks were presented as part of a panel on United Nations intervention at the October 2000 International Law Weekend in New York.

1. See Colin Nickerson, *Albright to See Peace's High Price in Sierra Leone*, BOSTON GLOBE, Oct. 18, 1999, at A1.

2. On these atrocities, see generally U.S. Dep't of State, *1999 Country Reports on Human Rights Practices, Sierra Leone*, Feb. 25, 2000, § 1, at http://www.state.gov/www/global/hu...ghts/1999_hrp_report/sierle.html (last visited Aug. 24, 2000) [hereinafter *Sierra Leone Country Report*]; Douglas Farah, *A War Against Women*, WASH. POST, Apr. 11, 2000, at A01; Norimitsu Onishi, *In Looted Home In Sierra Leone, A Rebel Riddle*, N.Y. TIMES, May 10, 2000, at A1 [hereinafter Onishi, *Looted Home*].

was an old soldier. Children as young as seven served in combat. Some came to fight out of desperation or disaffection, but remained because of terror and drugging. Others were kidnapped and forced into service. Many had no choice but to stay because they had RUF tattoos, and their families would not take them back.³

Everybody is knowing our tempers: Sierra Leone is also unsettling in that there appears to be little explanation for the longevity and brutality of the war. The conflict appears to have no source in, for instance, ethnic or religious division. The RUF and other rebel groups lack both ideology and popular support. They simply exploit alienation among young people, and then enforce continued service through intimidation. Their motivations appear to be to continue to profit from illegal diamond trading, and to continue to experience the joy of doing evil.⁴

We feared nobody: Sierra Leone is notorious for giving amnesty to the people who did these things. Amnesty was granted not once, but twice: first in 1996, in talks at Abidjan, Côte d'Ivoire, and again in 1999, at Lomé, Togo.⁵

Recently I have been studying expressive theories of law, and I find them very helpful in considering events in Sierra Leone. Expressive theories look not so much at whether a law deters or whether a law punishes, but at the message we get from a law. The message understood, rather than the message intended, is critical. Expressivism tells us that a harmful message in itself causes harm; therefore, when we evaluate whether an action done was good or bad, we should look at the message that the action was understood to convey.⁶ I am going to do that now, looking first at the Lomé Agreement and then at the post-Lomé proposal for a Special Court for Sierra Leone.

3. On child soldiers, see generally Ibrahim Abdullah & Patrick Muana, *The Revolutionary United Front of Sierra Leone*, in *AFRICAN GUERRILLAS* 172, 173 (Christopher Clapham ed., 1998); *Sierra Leone Country Report*, supra note 2, § 5; Amnesty International, Annual Report 2000: *Sierra Leone*, at http://www.web.amnesty.org/web/ar2...0d6fc802568f200_0552966!Open Document (last visited Oct. 19, 2000).

4. See generally, e.g., Abdullah & Muana, supra note 3, at 172-93; *Sierra Leone Country Report*, supra note 2, § 5; Barbara Crossette, *Sierra Leone Rebel Leader Reportedly Smuggled Gems*, N.Y. TIMES, May 14, 2000, at 14 § 1. The United Nations Security Council banned trade in Sierra Leone diamonds in July 2000. See S.C. Res. 1306, 55th Sess., 4168th mtg., pmb. & para. 12, U.N. Doc. S/Res/1306 (2000).

5. See ECOWAS: Peace Agreement between the Government of Sierra Leone and the Revolutionary United Front of Sierra Leone (RUF/SL) — Lomé, July 7, 1999, reprinted in 11 AFR. J. INT'L & COMP. L. 557 (1999) [hereinafter Lomé Agreement]; Peace Agreement between the Government of Sierra Leone and the Revolutionary United Front of Sierra Leone (RUF/SL) — Abidjan, Nov. 20, 1996, reprinted in 9 AFR. J. INT'L & COMP. L. 414 (1997) [hereinafter Abidjan Accord].

6. On expressivism, see generally, e.g., Elizabeth S. Anderson & Richard H. Pildes, *Expressive Theories of Law: A General Restatement*, 148 U. PA. L. REV. 1503 (2000); Dan M. Kahan, *The Secret Ambition of Deterrence*, 113 HARV. L. REV. 413 (1999).

Preceding the Lomé Agreement were eight years of civil war, peppered with coups d'état. At one point, in March 1996, Sierra Leoneans chose Kabbah, a lawyer and former United Nations Development Program official, to be the first democratically elected President in thirty years. Kabbah immediately negotiated a ceasefire with Foday Saybana Sankoh, the leader of the RUF. On November 30, 1996, the two signed a peace agreement, known as the Abidjan Accord.⁷

The Abidjan Accord promised an end to the fighting, followed by disarmament, demobilization, and reintegration of combatants into Sierra Leonean society. Numerous agencies, among them a Demobilization and Resettlement Committee, a Socio-Economic Forum, and a National Commission on Human Rights, were to be established to coordinate reconstruction. Political prisoners and prisoners of war were to be released. The RUF was to begin functioning as a legitimate political movement, and all its soldiers were to enjoy amnesty:

To consolidate the peace and promote the cause of national reconciliation, the Government of Sierra Leone shall ensure that no official or judicial action is taken against any member of the RUF/SL in respect of anything done by them in pursuit of their objectives as members of that organization up to the time of the signing of this Agreement.⁸

The RUF failed to meet disarmament deadlines, and the Abidjan Accord soon foundered. Low-ranking members of the military staged a coup in May 1997. Nigerian-led troops, organized under the auspices of the Economic Community of Western African States (ECOWAS), deposed that junta in February 1998. President Kabbah, who had been in exile in neighboring Guinea, resumed power.⁹

In January 1999, the RUF waged a destructive attack on Freetown that resulted in 6,500 dead, thousands kidnapped or maimed, and tens or hundreds of thousands left homeless. ECOWAS troops again drove the rebels back. Eventually Sankoh, a prisoner condemned to death for treason against Sierra

7. On these events, see *Sierra Leone Country Report*, *supra* note 2, at intro.; Norimitsu Onishi & Jane Perlez, *How U.S. Left Sierra Leone Tangled in a Curious Web*, N. Y. TIMES, June 4, 2000, at 6 § 1; James Rupert, *Civilian Rule Overturned in Sierra Leone*, WASH. POST, May 26, 1997, at A21 [hereinafter Rupert, *Civilian Rule*]. For specific provisions discussed *infra*, see Abidjan Accord, *supra* note 5.

8. Abidjan Accord, *supra* note 5, at art. 14.

9. On these events, see *Sierra Leone Country Report*, *supra* note 2, at intro.; James Rupert, *Sierra Leone Junta Leader Refuses to Abdicate Power*, WASH. POST, Aug. 1, 1997, at A23; Rupert, *Civilian Rule*, *supra* note 7. See generally Karsten Nowrot & Emily W. Schabacker, *The Use of Force to Restore Democracy: International Legal Implications of the ECOWAS Intervention in Sierra Leone*, 14 AM. U. L. REV. 321 (1998) (questioning the legality of the Nigerian-led action).

Leone, was brought to Lomé, where he and the government again signed a ceasefire in May 1999. Peace talks continued there, culminating six weeks later in the Lomé Agreement.¹⁰

In many respects the Lomé Agreement resembled the Abidjan Accord. It too promised disarmament, demobilization, and reintegration, and included speedy timetables for this process. It included even more sweeping plans for reconstruction, among them victims' and refugees' programs, educational institutions, a Human Rights Commission, a Truth and Reconciliation Commission, a National Election Commission, and a Constitutional Review Committee. It also talked about transforming the RUF from a political movement into a political party.

It spoke as well about amnesty. Again, unnamed combatants and collaborators received pardons for their pre-Lomé actions. Then the Lomé Agreement took a remarkable turn, granting the following, by name, to RUF leader Sankoh: "In order to bring lasting peace to Sierra Leone, the Government of Sierra Leone shall take appropriate legal steps to grant Corporal Foday Sankoh absolute and free pardon."¹¹

The Lomé Agreement did not just free Sankoh from liability. It rewarded him, appointing Sankoh, by name, chairman of the new Commission for Management of Strategic Resources, National Reconstruction and Development. This reputed trafficker in diamonds, Sierra Leone's main source of wealth, was to oversee the entire industry. Sankoh also was accorded the status of Vice President of Sierra Leone, answerable only to the President.

United Nations Secretary-General Kofi Annan lauded it as "a great step forward for Sierra Leone."¹² He admitted that the Lomé pardons were "difficult to reconcile with the goal of ending the culture of impunity," but suggested that he had alleviated that problem by addition of what United Nations officials have variously termed a "proviso," "statement," or "reservation."¹³ I must mention that although I am certain this addition exists, I have not been able to find it attached to printed or on-line versions of the Lomé Agreement. The only evidence I can find is in press reports or in United Nations documents, such as the following passage, in which Annan reported to the United Nations Security Council that he had instructed his "Special Representative to enter a reservation when he signed explicitly stating that, for the United Nations, the amnesty

10. On these events, see *Sierra Leone Country Report*, *supra* note 2, at intro. For specific peace accord provisions discussed, see *Lomé Agreement*, *supra* note 5.

11. See *Lomé Agreement*, *supra* note 5, at art. IX(1).

12. Seventh Report of the Secretary-General on the United Nations Observer Mission in Sierra Leone, U.N. SCOR, 54th Sess., para. 52, U.N. Doc. S/1999/836 (1999) [hereinafter *Seventh Report*].

13. See *id.* para. 7 (calling this addition a "proviso"); *id.* para. 54 (calling it a "reservation"). See also S.C. Res. 1315, 55th Sess., 4186th mtg., at pmb., U.N. Doc. S/Res/1315 (2000) [hereinafter *Resolution 1315*] (stating that United Nations representative had "appended" a "statement" after "his signature").

cannot cover international crimes of genocide, crimes against humanity, war crimes and other serious violations of international humanitarian law."¹⁴ Thus, Annan indicated that there was an international way out of the agreement even as he expressed a preference first to let Sierra Leone try to effect the amnesty.

United States officials maintained that the pardons of Sankoh and others were essential to the deal, though several of the United States State Department officials most concerned with human rights and humanitarian issues reportedly opposed giving Sankoh a government post. The amnesty outraged nongovernmental organizations; others, however, faulted opponents for holding Western, privileged viewpoints not suited to the needs of Sierra Leone.¹⁵

Among many people within Sierra Leone, there was resignation.¹⁶ An example is the following quote from sixty-eight-year-old Johnny Crowther. He had spent half his life savings to build a cement-block house; rebels destroyed it during the January 1999 attack on Freetown. Eight months later a New York Times reporter found Crowther breaking what was left of his house into stones that he could sell. Asked about the amnesty, Crowther said: "We just have to forget, really, we just have to forget. Nothing else. I have no power. Our leaders say we must forget. Am I going to refuse our leaders? We just have to unite together and build the country back up together. Finished, finished, that is all."¹⁷

What was the message of Lomé? There was an ostensible message of reconciliation — admirable expressions, both in the preamble and in the provisions of the Lomé Agreement, of desires to move forward, to reconcile, rebuild, reintegrate. That message, however, was supplanted by the message that the amnesty provision conveyed. That provision contained a specific and,

14. Seventh Report, *supra* note 12, para. 7.

15. On these reactions, see, e.g., Onishi & Perlez, *supra* note 7 (describing various reactions and listing as objectors Harold Hongju Koh, assistant Secretary of State for human rights; David J. Scheffer, ambassador at large for war crimes; and Julia V. Taft, assistant Secretary of State for refugees); Rémy Ourdan, *La guerre oubliée de la Sierra Leone (3): Le prix de la paix*, LE MONDE (Dec. 2, 1999), available at <http://www.lemonde.fr/.../0,232,0,seq-2044-32996-QUO,00.html> (last visited Mar. 17, 2001) (quoting Sierra Leonean government and United Nations officials as stating that calls for accountability reflected Western viewpoint); Norimitsu Onishi, *Survivors Sadly Say, Yes, Reward the Tormentors*, N.Y. TIMES, Aug. 30, 1999, at A4 (quoting opposing comments from Peter Takiramubde of Human Rights Watch) [hereinafter Onishi, *Survivors*].

16. One vocal exception was Abdul Tejan-Cole, a Freetown lawyer, who told a reporter: "The amnesty, it will not work. And the position of the international community is indefensible. If human rights are universal values, why give amnesty to those people of whom United Nations leaders like Mary Robinson say that they have committed 'atrocities worse than in Kosovo?'" Ourdan, *supra* note 15 (translation by author). Recently, Tejan-Cole was one of five human rights defenders honored by Human Rights Watch. See Africa News Service, Human Rights Watch Honors Sierra Leonean Advocate, Nov. 14, 2000, available at 2000 WL 29191915.

17. Onishi, *Survivors*, *supra* note 15.

as far as I can tell, unique grant of pardon to a named individual, Foday Sankoh. That individual was suspected of the most heinous crimes, of forcing others to commit unspeakable acts. He had flouted an earlier promise to disarm in exchange for amnesty. To pardon Sankoh, in that particular context, told the world that, at least in Sierra Leone, all talk of the new era of accountability was just that, just talk. That atrocities will not be punished. That perhaps, if they are effective enough, atrocities may even be rewarded. The subtextual message was, the West does not really care, and does not have the political will to do what really needs to be done in Sierra Leone.

Foday Sankoh, at least, got those messages. With regard to disarmament, he stalled, he objected, he dissembled, much as after the signing of the Abidjan Accord. When United States Secretary of State Madeleine Albright came to Freetown to see him, he showed up hours late for the meeting.¹⁸ He made harsh public statements regarding the post-Lomé process; in dealings with Annan, however, Sankoh reaffirmed his support for the peace process.¹⁹ Attacks on civilians resumed in October 1999, just a few months after Lomé, and almost as soon as Sankoh returned to Freetown.²⁰ By May 2000, as we all know, everything fell apart. Five hundred United Nations peacekeepers were seized by the RUF. Sankoh was arrested; nonetheless, peacekeepers remained in RUF custody for several months before they were released, sometimes by negotiated agreements and sometimes by commando operations.²¹ Disarmament "came to a standstill," Annan reported in mid-2000, and "the situation in Sierra Leone remained tense and volatile under conditions that resemble civil war."²²

The international community now has a chance to do better. There is a proposal for a Special Court for Sierra Leone. In June 2000, Sierra Leone wrote Secretary-General Annan a letter asking for such a court.²³ Two months later, a Security Council resolution instructed the Secretary-General to negotiate an agreement establishing a Special Court.²⁴ On October 4, 2000, Annan submitted

18. See Onishi & Perlez, *supra* note 7.

19. See Third Report of the Secretary-General on the United Nations Mission in Sierra Leone, U.N. SCOR, 55th Sess., paras. 6-7, 43, 60, U.N. Doc. S/2000/186 (2000); Second Report of the Secretary-General Pursuant to Security Council Resolution 1270 (1999) on the United Nations Mission in Sierra Leone, U.N. SCOR, 55th Sess., para. 4, U.N. Doc. S/2000/13 (2000).

20. *Id.* para. 3, 20-21.

21. On events in spring and summer 2000, see Fourth Report of the Secretary-General on the United Nations Mission in Sierra Leone, U.N. SCOR, 55th Sess., paras. 2, 56-79, 95, U.N. Doc. S/2000/455 (2000); Barbara Crossette, *U.N. to Establish a War Crimes Panel to Hear Sierra Leone Atrocity Cases*, N.Y. TIMES, Aug. 15, 2000, at A6; John Donnelly & Joe Lauria, *UN Peace Efforts on Trial in Africa*, BOSTON GLOBE, May 11, 2000, at A1.

22. Fifth Report of the Secretary-General on the United Nations Mission in Sierra Leone, U.N. SCOR, 55th Sess., para. 2, U.N. Doc. S/2000/751 (2000).

23. See Resolution 1315, *supra* note 13, pmbl.

24. *Id.*

a proposed agreement and draft statute to the Security Council.²⁵ The proposal, for a hybrid court that would comprise both international and Sierra Leonean judges and would apply both international and Sierra Leonean law, is now under consideration.

The contents of the draft statute address the four notorious features of the Sierra Leone civil war that I mentioned at the outset. Respecting the campaign of terror against civilians, the statute would set up a unit to address the needs of victims and witnesses. It would require the court to balance a defendant's fair-trial rights against the needs for protection of victims and witnesses. It calls for judges, investigators, and other staff who are trained in issues related to juvenile justice and sexual violence. It includes three articles that would permit prosecution for international crimes; specifically, Article 2 relating to crimes against humanity; Article 3 relating to violations of the law of internal armed conflict; and Article 4 relating to other serious violations of international humanitarian law. With regard to the violence that women suffered during the conflict, two of the international articles specifically allow prosecution for rape, sexual slavery, enforced prostitution, forced pregnancy, and all other sexual violence. Furthermore, Article 5, which covers Sierra Leonean law, permits prosecution for certain abuses and kidnappings of girls.

With regard to the phenomenon of child soldiers and child victims, the statute has two approaches. First of all, it permits prosecution not only for abuse of girls, as mentioned above, but also for conscription of children under fifteen for use in combat. Second, and most notably, the statute provides for a Juvenile Chamber to prosecute child soldiers. This decision posed a "moral dilemma," according to the Secretary-General's report, between the desire of the people of Sierra Leone to call war criminals to account regardless of age and the concern of human rights organizations that prosecution would undercut rehabilitation.²⁶ Annan said that the proposed statutory language aimed to balance these concerns, should the Council, "weighing in the moral-education message to the present and next generation of children in Sierra Leone,"²⁷ decide to pursue prosecution. It is contemplated that the cases of defendants who were between fifteen and eighteen when the alleged crimes occurred might be referred to the Sierra Leone Truth and Reconciliation Commission, when it begins operation. Annan's draft leaves that decision, however, to the discretion of the prosecutor. Those cases referred to the Special Court might be conducted

25. See Report of the Secretary-General on the Establishment of a Special Court for Sierra Leone, U.N. SCOR, 52d Sess., U.N. Doc. S/2000/915 (2000) [hereinafter Secretary-General's Special Court Report]. The proposed Agreement between the United Nations and the Government of Sierra Leone on the Establishment of a Special Court for Sierra Leone, as well as the draft Statute of the Special Court for Sierra Leone [hereinafter Special Court Statute], are attached to this report.

26. Secretary-General's Special Court Report, *supra* note 25, para. 32, at 7.

27. *Id.* para. 38, 8.

in camera, in anonymous proceedings. A finding of guilt would result in a "disposition" entailing no prison time, but rather orders to participate in community service, counseling, schooling and vocational training, or disarmament and reintegration programs.²⁸

Such rehabilitative options begin to address the third feature of the Sierra Leone conflict; that is, the disaffection and despair that contributed, at least at the beginning, to the war.

Finally, respecting the fourth feature, amnesty, the Special Court statute minces no words. It states: "An amnesty granted to any person falling within the jurisdiction of the Special Court in respect of the crimes referred to in Articles 2 to 4 of the present Statute shall not be a bar to prosecution."²⁹ It says, simply, that the amnesty does not apply. It also incorporates a new message about accountability. The clock for prosecution starts on November 30, 1996, the date of the Abidjan Accord. The statute contains no finishing date for the court, as is the case with the International Criminal Tribunal for the former Yugoslavia.³⁰ This indicates that the Special Court is to keep watch over those who should commit crimes within its jurisdiction in the future.

The message of the draft statute for the Special Court, then, is far stronger than that of the Lomé Agreement. It promises accountability. It allows flexibility to accommodate some of the features characteristic of the Sierra Leone conflict.

It remains to be seen if the Special Court will be established. The initial Security Council resolution suggested funding by voluntary contributions.³¹ The Secretary-General's report questions the adequacy of this method, and estimates that the court will cost twenty-two million dollars to operate the first

28. Following the presentation of this paper, the United Nations Security Council omitted detailed discussion of a Juvenile Chamber from the draft statute. See Letter dated December 22, 2000 from the President of the Security Council addressed to the Secretary General, U.N. Doc. S/2000/1234 (2000). Annan acceded in large part, but called for reinstatement of the specific provision regarding disposition. See Letter dated January 12, 2001 from the Secretary General addressed to the President of the Security Council, U.N. SCOR, U.N. Doc. S/2001/40 (2001). For a critique of the Juvenile Chamber proposal, see Diane Marie Amann, *Calling Children to Account: The Proposal for a Juvenile Chamber in the Special Court for Sierra Leone*, in PEPPERDINE L. REV. (forthcoming 2001).

29. Special Court Statute, *supra* note 25, at art. 10.

30. Compare Special Court Statute, *supra* note 25, at art. 1 with Statute of the International Criminal Tribunal for the Former Yugoslavia, arts. 1, 8, S.C. Res. 827, U.N. SCOR, 48th Sess., 3217th mtg., Annex, U.N. Doc. S/RES/827 (1993), reprinted in 32 I.L.M. 1159, 1192, 1194 (1993). In contrast, the statute for the Rwanda Tribunal contains both start and finish dates for temporal jurisdiction. See Statute of the International Tribunal for Rwanda, arts. 1, 7, S.C. Res. 955, U.N. SCOR, 49th Sess., 3453d mtg., Annex, U.N. Doc. S/RES/955 (1994), reprinted in 33 I.L.M. 1598, 1602, 1605 (1994).

31. See Resolution 1315, *supra* note 13, para. 8.

year.³² That is an extremely conservative number, less than a quarter of this year's budget for either of the ad hoc tribunals.³³

Despite financial and other obstacles, the Special Court ought to be attempted. I mentioned at the beginning that one of the notorious features of the Sierra Leone conflict was amputation, at first of the hands those who had dared to vote. The practice was not unique to this conflict. Belgian colonizers had chopped off the hands of Congolese who resisted harsh conditions at the rubber plantations.³⁴ The perpetrators of those atrocities never were punished. A century later, Foday Sankoh's RUF borrowed that tactic of dominance, infused it with new meaning, and used it for a new round of terror. Punishing those responsible for atrocities in Sierra Leone, by conveying a concrete message of accountability, may begin to break that cycle of violence.

32. See Secretary-General's Special Court Report, *supra* note 25, at paras. 57-63, 68-72.

33. A December 1999 report stated that the United Nations General Assembly had "decided to appropriate some \$106.15 million gross for the former Yugoslavia Tribunal and \$86.15 million gross for the Rwanda Tribunal" for this year. *UN: General Assembly Adopts 2000-2001 Programme Budget of Some \$2.536 Billion as It Concludes Work*, M2 PRESSWIRE, Dec. 24, 1999, available at 1999 WL 24375551. Subsequent references to the actual budgets were somewhat lower: about \$96 million for ICTY and about \$80 million for ICTR. See *ICTY President Wants Faster Processing of War Criminals, More Expeditious Trials*, WORLDS NEWS CONNECTION, June 21, 2000, available at 2000 WL 22916078; Sylvia de Bertodano, *Rwanda's Long Wait for Justice*, TIMES (London), Aug. 22, 2000, at LAW4.

34. See ADAM HOCHSCHILD, *KING LEOPOLD'S GHOST* 164-66 (1998) (describing practice, so widely reported "that people overseas began to associate the Congo with severed hands"); BARBARA KINGSOLVER, *THE POISONWOOD BIBLE* 144, 432 (1998) (referring to this practice, and to "the whacked-off ghost hands of all those rubber workers," in novel treating the end of colonialism in the Congo); Onishi, *Looted Home*, *supra* note 2 (linking Belgian and RUF practices).