

Voir Note explicative
See Explanatory Note

Numéro de dossier

File-number

35505/04

COUR EUROPÉENNE DES DROITS DE L'HOMME
EUROPEAN COURT OF HUMAN RIGHTS

Conseil de l'Europe – *Council of Europe*
Strasbourg, France

REQUÊTE
APPLICATION

présentée en application de l'article 34 de la Convention européenne des Droits de l'Homme,
ainsi que des articles 45 et 47 du règlement de la Cour

*under Article 34 of the European Convention on Human Rights
and Rules 45 and 47 of the Rules of Court*

IMPORTANT: La présente requête est un document juridique et peut affecter vos droits et obligations.
This application is a formal legal document and may affect your rights and obligations.

**I. LES PARTIES
THE PARTIES**

**A. LE REQUÉRANT/LA REQUÉRANTE
THE APPLICANT**

(Renseignements à fournir concernant le/la requérant(e) et son/sa représentant(e) éventuel(le))
(Fill in the following details of the applicant and the representative, if any)

1. Nom de famille GRANT 2. Prénom(s) CAUL SILFORD
Surname First name(s)
- Sexe : masculin / féminin Sex : male / female
3. Nationalité BRITISH 4. Profession SALES MANAGER
Nationality Occupation
5. Date et lieu de naissance 29TH DECEMBER 1961 UNITED KINGDOM
Date and place of birth
6. Domicile 32 RIVERSIDE ROAD, STRATFORD, LONDON E15 2RQ
Permanent address
7. Tel. N° 0208 519-6179
8. Adresse actuelle (si différente de 6.) HMP THE VERNE, PORTLAND, DORSET,
Present address (if different from 6.) DT5 1E
9. Nom et prénom du/de la représentant(e)* NONE
Name of representative*
10. Profession du/de la représentant(e) NONE
Occupation of representative
11. Adresse du/de la représentant(e) NONE
Address of representative
12. Tel. N° N/A Fax N° N/A

**B. LA HAUTE PARTIE CONTRACTANTE
THE HIGH CONTRACTING PARTY**

(Indiquer ci-après le nom de l'Etat/des Etats contre le(s)quel(s) la requête est dirigée)
(Fill in the name of the State(s) against which the application is directed)

13. UNITED KINGDOM

* Si le/la requérant(e) est représenté(e), joindre une procuration signée par le/la requérant(e) et son/sa représentant(e).
If the applicant appoints a representative, attach a form of authority signed by the applicant and his or her representative.

II. EXPOSÉ DES FAITS
STATEMENT OF THE FACTS

(Voir chapitre II de la note explicative)
(See Part II of the Explanatory Note)

14. I HAVE AN ONGOING, UNRESOLVED GRIEVANCE WITH THE UNITED KINGDOM AND ITS JUDICIARY FOR SEVERAL VIOLATIONS OF MY RIGHTS AND OF ITS OBLIGATIONS UNDER THE EUROPEAN CONVENTION FOR THE PROTECTION OF HUMAN RIGHTS BY THE RULE OF LAW.

THE VIOLATIONS BEGAN IN AUGUST 1997 AND HAVE CONTINUED TO PRESENT DATE. BECAUSE OF THE UNLAWFUL ACTS OR OMISSIONS OF THE JUDICIARY, I HAVE HAD NO RECOURSE TO MY ENFORCEABLE RIGHTS OF PROTECTION.

IN NOVEMBER 1994 I RETAINED THE SERVICES OF BINDMAN AND PARTNERS SOLICITORS, TO PURSUE A COMPLAINT AGAINST KING'S COLLEGE NHS HOSPITAL TRUST FOR NEGLIGENTLY GIVING ME FALSE INFORMATION ABOUT THE CIRCUMSTANCES LEADING UP TO THE DEATH OF MY 14-MONTH-OLD SON.

MY COMPLAINT WAS FUNDED BY THE STATE.

BINDMAN + PARTNERS ADVISED ME, IN WRITING, THAT THERE WAS NO LAW IN THE UNITED KINGDOM WHICH GAVE PROTECTION AGAINST FALSE ADVICE.

I FOUND THIS VERY DIFFICULT TO ACCEPT AND SOUGHT THE ADVICE OF SEVERAL OTHER LAW FIRMS, WHO ALL TOLD ME BINDMAN'S WERE WRONG.

I TRIED TO HAVE MY LEGAL AID CERTIFICATE TRANSFERRED TO A FIRM WHO WERE PREPARED TO PROPERLY REPRESENT MY INTEREST, BUT BINDMAN'S REFUSED TO RELEASE IT.

CONTINUED ON SEPARATE PAPERS

Si nécessaire, continuer sur une feuille séparée
Continue on a separate sheet if necessary

(1)

STATEMENT OF FACTS CONTINUED FROM PAGE 3

IN AUGUST 1997 I ISSUED A WRIT AGAINST BINDMAN & PARTNER FOR SEVERAL BREACHES OF THE SOLICITORS CODE OF CONDUCT, THEY INCLUDED, A BREACH OF CONTRACT, WILFULLY GIVING FALSE ADVICE AND FAILURE TO ACT IN THE BEST INTEREST OF THE CLIENT.

BINDMAN & PARTNERS WERE REPRESENTED, ^{BY} ANOTHER FIRM OF SOLICITORS, REYNOLDS PORTER CHAMBERLAIN. (RPC)

THEY OFFERED NO DEFENCE TO MY CLAIM AND SOUGHT ONLY TO RELY ON THE INFLUENCE OF THEIR FRIENDS OR FAMILIES WITHIN THE JUDICIARY.

THE SENIOR PARTNER AT RPC, ALAN TOULSON, IS THE BROTHER OF A HIGH COURT JUDGE, MR JUSTICE TOULSON.

ALAN TOULSON, OR HIS FIRM, WENT TO HIS BROTHER AND ARRANGED TO HAVE MY CLAIM UNLAWFULLY STRUCK OUT OF COURT. RPC ALSO ARRANGED, WITH JUSTICE TOULSON, AN UNLAWFUL INJUNCTION AGAINST ME CONTACTING BINDMAN'S DIRECTLY.

THE ACTIONS OF JUSTICE TOULSON AND HIS BROTHER, OR BROTHER'S LAW FIRM IS A DIRECT CONTRAVENTION OF ARTICLE 6 SECTION 1. OF THE EUROPEAN CONVENTION.

DURING THE ABUSE OF PROCESS AND INFRINGEMENT OF MY RIGHTS I MADE SEVERAL COMPLAINTS TO DOWNING STREET, MEMBERS OF PARLIAMENT, THE MEDIA AND TO HER MAJESTY THE QUEEN

~~IN AN EFFORT~~

(2)

NO HELP WAS FORTHCOMING. IN AN EFFORT TO ATTRACT PUBLIC ATTENTION TO ALL WHAT WAS TAKING PLACE, I SPRAY PAINTED THE WINDOWS OF THE OFFICES OF BINDMAN + PARTNERS.

I WAS SUBSEQUENTLY ARRESTED AND PROSECUTED FOR CRIMINAL DAMAGE. I PLEADED NOT GUILTY AS A RESULT OF CIRCUMSTANCES.

WHILST I AWAITED TRIAL ON BAIL, I WAS SUBJECTED TO SEVERAL FALSE ARREST AND DETENTION, INCLUDING 12TH AUGUST 1991. I WAS ARRESTED ON AN ALLEGATION OF BREACHING BAIL CONDITIONS. I WAS TAKEN FROM THE HOME OF MY PARENTS TO A POLICE STATION, WHERE I WAS HELD IN CUSTODY OVERNIGHT. WHILST AT THE POLICE STATION, I WAS FEARFUL FOR MY LIFE, BECAUSE OF THE AMOUNTS OF BLACK PEOPLE DYING IN POLICE CUSTODY.

AS A RESULT OF MY FEAR, I TRIED TO AVOID SLEEPING, HOWEVER I MUST HAVE DOZED OFF, BECAUSE AT 2 AM IN THE NIGHT I SUDDENLY WOKE UP TO FIND A POLICE OFFICER SLOWLY CREEPING INTO MY CELL. THE OFFICER SAID THEY HAD JUST CHANGED SHIFTS AND WERE WONDERING IF I WANTED SOMETHING TO EAT.

I FEARED IF THE OFFICER HAD GOTTEN CLOSE ENOUGH TO ME, HE MIGHT OF SMOTHERED ME WITH THE PILLOW IN THE CELL.

MY FEARS WERE WARRANTED BY THE FACT THAT THERE WERE NO CONDITIONS ATTACHED TO MY BAIL AND I HAD NOT DONE OR COMMITTED ANY ACTS WHICH COULD BE REGARDED AS A BREACH. THE MOTIVATION BEHIND MY ARREST WAS QUESTIONABLE.

(3)

THE FOLLOWING MORNING, 13TH AUGUST 1997, I WAS BROUGHT BEFORE A DISTRICT JUDGE, MR BAKER, DESPITE THE DOCUMENTED FACT THAT THERE WERE NO CONDITIONS ATTACHED TO MY BAIL, THE JUDGE REMANDED ME TO 4 DAYS IN PRISON.

AT THE AGE OF 35, THIS WAS MY FIRST TIME TO ^{EXPERIENCE} ~~EXPERIENCE~~ IMPRISONMENT, IT WAS FRIGHTENING, HUMILIATING, DEGRADING AND TORTUROUS. THE FACT THAT I WAS STILL MOURNING THE LOSS OF MY SON AND SEPARATION FROM MY FAMILY MADE IT ALL THE WORSE.

ON THE 17TH AUGUST 1997 I WAS TAKEN BACK TO THE SAME COURT BEFORE A DIFFERENT JUDGE, MR JOHNSTONE.

MR JOHNSTONE STATED, IN COURT, HE WOULD NOT BECOME INVOLVED IN WHAT WAS TAKING PLACE, HE CONFIRMED THERE WERE NO CONDITIONS ATTACHED TO MY BAIL AND RELEASE ME FROM CUSTODY.

THE UNITED KINGDOM, THROUGH ITS PUBLIC AUTHORITIES, HAD BEGUN MY PERSECUTION.

IN JUNE 1998 I WAS EVENTUALLY CONVICTED FOR THE ALLEGATION OF CRIMINAL DAMAGE.

I APPEALED AGAINST MY CONVICTED AND IN JULY 1998 MY CONVICTED WAS OVERTURNED. THE APPELLATE COURT, PRESIDED OVER BY HIS HONOUR JUDGE INMAN, ACCEPTED MY DEFENCE OF DURESS OF CIRCUMSTANCES.

CLEARLY, NOT ALL THE JUDICIARY WAS CORRUPT AT THIS POINT IN TIME.

HOWEVER, I HAD RECEIVED A REPLY, TO MY COMPLAINT, FROM BUCKINGHAM PALACE, WRITTEN ON BEHALF OF THE QUEEN.

IT IS CLEAR FROM THAT LETTER THAT THE QUEEN COULD NOT INTERVENE DIRECTLY, HOWEVER, SHE INSTRUCTED THAT MY LETTER OF COMPLAINT BE SENT DIRECT TO THE FORMER HEAD OF THE JUDICIARY, LORD IRVINE. THE LETTER FROM BUCKINGHAM PALACE ALSO CONFIRMS LORD IRVINE'S ~~KNEW~~ AWARENESS OF MY CASE.

LORD IRVINE'S FAILURE TO ACT ON THE ISSUES RAISED IN MY COMPLAINT ALLOWED THE CORRUPTION TO SPREAD OUT OF CONTROL AND BECAUSE HE WAS THE HEAD OF THE JUDICIARY I WAS DENIED THE RIGHT TO BE HEARD BY AN IMPARTIAL, INDEPENDENT TRIBUNAL, THE BASIC PRINCIPLES OF FAIRNESS.

IN SEPTEMBER 1998 I RE-ISSUED MY WRIT, THIS TIME THERE WERE 4 DEFENDANTS, BUNDMAN & PARTNERS FOR REASONS ALREADY GIVEN, THE SOLICITORS INDEMNITY FUND, THE HOSPITAL RESPONSIBLE FOR SUBJECTING ME TO MENTAL TORTURE AND THE HOSPITAL RESPONSIBLE FOR DELIBERATELY OVER-PRESCRIBING ME ANTI-DEPRESSANTS.

AT THIS STAGE THE FULL FORCE OF THE UNITED KINGDOM STOOD AGAINST ME.

ALAN TOULSON, OR HIS FIRM, WENT BACK TO HIS BROTHER TO HAVE MY WRIT STRUCK OUT, AGAIN UNLAWFULLY.

IN AN EFFORT TO BREAK ME ONCE AND FOR ALL, R PC ALSO ALLEGED THAT I HAD BREACHED THEIR UNLAWFUL

(2)

INJUNCTION. IN FEBRUARY 1999 MR JUSTICE TOULSON CONDUCTED A HEARING, IN MY ABSENCE, WITHOUT LEGAL REPRESENTATION AND WITHOUT MY KNOWLEDGE, PROSECUTED BY HIS BROTHER OR HIS BROTHER'S LAW FIRM.

AT THE CONCLUSION OF THAT UNLAWFUL HEARING, JUSTICE TOULSON ORDERED THAT I SHOULD GO TO PRISON AND SERVE 6 MONTHS FOR CONTEMPT OF COURT.

WHEN I FOUND OUT ABOUT THIS I WAS PETRIFIED AND WOR OF ALL I HAD NO ONE, IN, OR OUT, AUTHORITY TO WHOM I COULD COMPLAIN.

OUT OF FEAR, I WENT INTO HIDING, BUT I SOON LEARN THAT IMPRISONMENT WITHOUT BARS IS WORSE THAN PRISON WITH BARS.

I HAD APPEALED AGAINST THE UNLAWFUL STRIKING OUT OF MY CLAIM IN JANUARY 1999 BUT MY APPEAL WAS DISALLOWED.

I NEEDED TO KNOW HOW FAR THE CORRUPTION HAD SPREAD SO IN MARCH 1999 I SURRENDERED MYSELF TO SCOTLAND YARD AND AGAIN I WAS DETAINED AND HELD IN POLICE CUSTODY OVERNIGHT. I WAS ONCE AGAIN DEPRIVED OF MY LIBERTY WITHOUT ANY DUE PROCESS OF LAW.

THE FOLLOWING MORNING I WAS COLLECTED AND TAKEN DIRECT TO PRISON BY CIVILIAN STAFF FROM THE HIGH COURT.

MY LIFE WAS IN RUINS, I PLEADED, I BEGGED, BUT NO ONE LISTENED. I HAD NO RECOURSE.

(U)

WHILST IN PRISON I EXPLAINED TO A PRISON OFFICER HOW I CAME TO BE THERE. THE OFFICER ASSISTED ME WITH A PHONE CALL TO THE HIGH COURT.

SOMETIME IN APRIL 1999 I WAS PRESENTED BEFORE MR JUSTICE BUCKLEY. HE ORDERED THAT IF I AGREED TO SEE THE PRISON MEDICS HE WOULD CONSIDER RELEASING ME. BUT I WAS AFRAID AND UNTRUSTING OF HIS ORDER, I DID NOT, NOR DO I CURRENTLY, HAVE A MENTAL PROBLEM I HAD NOT COMMITTED ANY CRIME OR CONVICTED FOR ANY CRIME. ACCORDING TO THE JUDGE MY IMPRISONMENT WAS FOR CONTEMPT OF COURT AND I DID NOT SEE OR UNDERSTAND WHAT MY STATE OF MIND HAD TO DO WITH WANTING MY RELEASE FROM UNLAWFUL IMPRISONMENT.

I REFUSED TO SEE THE MEDICS AND WAS RE-PRESENTED MAY 28TH 1999. I TOLD MR JUSTICE BUCKLEY WHY I HAD REFUSED AND HE TURNED AND TOLD ME "MR GRANT THE BACKGROUND OF YOUR CASE IS EXTREMELY TRAGIC THERE ARE MANY WAYS IN WHICH YOU CAN PURSUE IT, GO HOME TO YOUR FAMILY."

I TRIED MY BEST TO GET ON WITH MY LIFE. DURING FEBRUARY 2000 AND MAY 2001, I WAS EMPLOYED IN THE LONDON BOROUGH OF WESTMINSTER AS A TRAFFIC WARDEN SUPERVISOR.

MY RESPONSIBILITIES INCLUDED THE ISSUING OF PENALTY CHARGE NOTICES (PCN'S) AND THE SUPERVISION OF OTHERS ISSUING PCN'S.

TO
MY EMPLOYERS WANTED ME, ENGAGE AND ENCOURAGE OTHERS TO ENGAGE IN ACTIVITY AIMED AT TARGETING

MOTORIST IN ORDER TO INCREASE THE NUMBER OF PCN'S AND THEREFORE INCREASE REVENUE.

DRIVERS

I REFUSED TO DELIBERATELY TARGET UNSUSPECTING AND REFUSED TO ENCOURAGE MY TEAM MEMBERS TO DO THE SAME. THIS LED TO MY SUSPENSION AND DESPITE MY EMPLOYERS LAWYERS, FIRST BUSINESS, ADVISING THEM TO ALLOW ME BACK TO WORK, MY EMPLOYERS DISMISSED ME FROM MY EMPLOYMENT.

AS A DIRECT RESULT OF THE UNITED KINGDOM'S FAILURE TO AFFORD ME THE PROTECTION OF LAW, I WAS UNABLE TO TAKE MY EMPLOYERS TO COURT FOR UNFAIR DISMISSAL

I HAVE THREE CHILDREN WITHIN MY CURRENT RELATIONSHIP AND THREE FROM MY PREVIOUS MARRIAGE, WHICH WAS DESTROYED BY THE STATE.

MY PERSECUTION BY THE UNITED KINGDOM IMPARTED UPON MY ABILITY TO LAWFULLY EARN A LIVING WHICH WOULD AFFORD ME THE DIGNITY TO DO THE BEST I CAN TOWARDS THE WELFARE OF MY CHILDREN.

IT WAS AT THIS POINT I DECIDED THAT THE UNITED KINGDOM CANNOT DENY ME ALL PROTECTION OF LAW AND STILL SEEK TO PUNISH ME BY THE SAME LAW.

REBELLION WAS MY ~~WAS~~ MY LAST RECOURSE AGAINST THE FLAGRANT ABUSE, TOTAL DISREGARD AND CONTEMPT OF THE RULE OF LAW BY THE UNITED KINGDOM.

THE UNITED KINGDOM HAS IGNORED CITATIONS FOR FROM ITS OWN ATTORNEY GENERAL, LORD GOLDSMITH, WHO

(8)

QUOTED JUSTICE BRANDIS, OF THE UNITED STATES OF AMERICA, WHO SAID, OVER 50 YEARS AGO.

“ IN A GOVERNMENT OF LAWS, EXISTENCE OF THE GOVERNMENT WILL BE IMPERILED IF IT FAILS TO OBSERVE THE LAW SCRUPULOUSLY. GOVERNMENT IS THE POTENT OMNIPRESENT TEACHER. FOR GOOD OR ILL, IT TEACHES THE WHOLE PEOPLE BY ITS EXAMPLE, IF THE GOVERNMENT BECOMES A LAW BREAKER IT BREEDS CONTEMPT FOR THE LAW IT INVITES EVERY MAN TO BECOME A LAW UNTO HIMSELF, IT INVITES ANARCHY ”

AS A DIRECT RESULT OF THE UNITED KINGDOM'S CONTEMPT FOR THE RULE OF LAW AND ITS FAILURE TO SECURE ME MY ENFORCEABLE RIGHTS GUARANTEED BY THE MAGNA CARTA, THE UNIVERSAL DECLARATION OF HUMAN RIGHTS AND THE EUROPEAN CONVENT FOR THE PROTECTION OF HUMAN RIGHTS AND FUNDAMENTAL FREEDOMS.

I REBELLED, ON THE 16TH AUGUST 2003 I IMPORTED 44 KILOS OF CANNABIS INTO THE UNITED KINGDOM. I WAS ARRESTED AT GATWICK AIRPORT AND IMMEDIATELY GAVE MY REASONS FOR MY IMPORTATION.

DESPITE THE FACT THAT THE UNITED KINGDOM COULD NOT GUARANTEE ME MY ABSOLUTE RIGHT TO A FAIR TRIAL BY AN INDEPENDENT AND IMPARTIAL TRIBUNAL, I WAS PROSECUTED, TRIED AND CONVICTED BY A JURY ACTING ON THE MISDIRECTIONS OF A UN-INDEPENDENT, PARTIAL JUDGE.

I GAVE EVIDENCE IN COURT AND TOLD THE JURY I ACTED AS DIRECT RESULT OF THE CIRCUMSTANCES DESCRIBE

(9)

ABOVE. THE JUDGE TOLD THE JURY "THERE IS NO DEFENCE OF JUSTIFICATION IN ENGLISH LAW, NOR IS THERE ANY DEFENCE OF JUSTIFICATION CONFERRED ON ANYONE BY VIRTUE OF THE EUROPEAN CONVENTION ON HUMAN RIGHTS"

SEE PAGE 5 LINE 13-15 OF THE JUDGES' SUMMING UP

THIS DELIBERATE MISDIRECTION IS A FLAGRANT LIE, BECAUSE SECTION 2 OF ARTICLE 2 OF THE CONVENTION RIGHTS ARE CLEARLY DEFENCES OF JUSTIFICATION.

I SOUGHT PERMISSION TO APPEAL AGAINST MY UNLAWFUL CONVICTION AND DETENTION, BUT WAS REFUSED.

THE DECISION TO REFUSE ME THE RIGHT TO CHALLENGE MY DETENTION IS A DIRECT VIOLATION OF ARTICLE 5 SECTION 4 CONVENTION RIGHTS

I WAS UNREPRESENTED AND WAS DENIED THE RIGHT TO REPRESENT MYSELF. I WAS DENIED ALL ACCESS TO COURT.

THE DENIAL OF ACCESS TO COURT IS A DIRECT VIOLATION OF ARTICLE 6 SECTION 1 AND 3C OF THE CONVENTION RIGHTS.

MY GROUNDS OF APPEAL ARE NOT REFLECTED IN THE TRANSCRIPT OF THE JUDGMENT REFUSING ME ACCESS TO COURT.

IF I WAS AFFORDED MY RIGHTS IN ACCORDANCE WITH THE RULES OF LAW, I WOULD NOT HAVE BEEN PROSECUTED FOR ACTING IN SELF DEFENCE.

THE UNITED KINGDOM ARE JUDGES IN THEIR OWN CAUSE, AS A RESULT I AM DENIED THE BASIC ^{PRINCIPLES} ~~PRINCIPLES~~ OF NATURAL JUSTICE, FAIRNESS, INDEPENDENCE AND IMPARTIALITY. BASED ON THE FACTS, I SHOULD NOT HAVE FACED TRIAL AND CONVICTION. I WOULD THEREFORE

NOT BE IMPRISONED AND SEPARATED FROM MY FAMILY AND BEING SUBJECTED TO MENTAL TORTURE.

NON-VIOLENT ACTIONS, OR EVEN VIOLENT ACTIONS, CARRIED OUT IN THE FACE OF INJUSTICE WAS NOT INVENTED BY ME. TO PREVENT THE NEED FOR SUCH ACTIONS, THE RULE OF LAW WAS ESTABLISHED.

EVERY LIVING CREATURE, MAN OR ANIMAL, IS ENTITLED TO SELF DEFENCE, SELF PROTECTION AND SELF PRESERVATION

CONSIDERING THAT OVER 800 YEARS AGO THE UNITED KINGDOM DECLARED IN THE MAGNA CARTA THAT "NO FREEMAN SHALL BE TAKEN OR IMPRISONED, OR BE DISSEISED OF HIS FREEHOLD, OR LIBERTIES, OR FREE CUSTOMS, OR BE OUTLAWED OR EXILED, OR ANY OTHERWISE DESTROYED; NOR WILL WE PASS UPON HIM, NOR CONDEMN HIM BUT BY LAWFUL JUDGMENT OF HIS PEERS, OR BY THE LAW OF THE LAND. WE WILL SELL TO NO MAN, WE WILL NOT DENY OR DEFER ANY MAN EITHER JUSTICE OR RIGHT"

CONSIDERING THAT THE UNITED KINGDOM IS SIGNATORY TO THE AIMS AND DEMOCRATIC ENFORCEMENT OF THE UNIVERSAL DECLARATION OF HUMAN RIGHTS, THE EUROPEAN CONVENTION FOR THE PROTECTION OF HUMAN RIGHTS AND FUNDAMENTAL FREEDOMS BASED ON THE UNIVERSAL CONVENTION

AND CONSIDERING THE UNITED KINGDOM'S OWN HUMAN RIGHTS ACT 1998 BASED ON THE EUROPEAN CONVENTION

THE ACTIONS OF THE UNITED KINGDOM AND ITS FAILURE TO SECURE ME MY RIGHTS ARE IN DIRECT VIOLATIONS OF ITS INTERNATIONAL, NATIONAL AND DOMESTIC OBLIGATIONS TO