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**Summary prepared by the Office of the High Commissioner
for Human Rights in accordance with paragraph 15 (c) of the
annex to Human rights Council resolution 5/1**

Liberia*

The present report is a summary of eight stakeholders' submissions¹ to the universal periodic review. It follows the structure of the general guidelines adopted by the Human Rights Council. It does not contain any opinions, views or suggestions on the part of the Office of the United Nations High Commissioner for Human Rights (OHCHR), nor any judgement or determination in relation to specific claims. The information included herein has been systematically referenced in endnotes and, to the extent possible, the original texts have not been altered. Lack of information or focus on specific issues may be due to the absence of submissions by stakeholders regarding these particular issues. The full texts of all submissions received are available on the OHCHR website. The report has been prepared taking into consideration the four-year periodicity of the first cycle of the review.

* The present document was not edited before being sent to United Nations translation services.

I. Background and framework

A. Constitutional and legislative framework

1. JS2 indicated that there was a need to review national legislation, including with a view to removing from the legislation laws that discriminate against women,² and to harmonize the national laws with ICESCR and ICCPR.³

2. JS2 stated that, as there was no legislation to protect human rights defenders in Liberia, they remained vulnerable in the discharge of their duty. It indicated that there was a need for such legislation.⁴

3. IHRB noted that Liberia's Labour Law allowed for workers to be subjected to summary dismissal without cause and for discriminatory reasons. As a consequence, most workers were not protected by legislation against exploitation.⁵ IHRB added that this situation appeared to be inconsistent with Liberia's Constitution.⁶

B. Institutional and human rights infrastructure

4. HRW stated that an Independent National Commission on Human Rights (INCHR), which had been mandated as part of the 2003 Accra Peace Agreement and passed into law in March 2005, was yet to be established due to consideration of proposed amendments to the INCHR Act, vetting and selection of the commissioners, and parliamentary rejection of the commissioners following confirmation hearings.⁷ HRW noted that the commissioners had been rejected by the Senate for the second time in February 2010, with no reasons given for the rejection.⁸ HRW recommended that the Senate provide detailed explanation for its rejection of the seven commissioners; that further consideration of commissioners by the Senate should be decided upon on an individual basis, and not by a group decision; and that Liberia ensure adequate civil society involvement in the selection process for any new nominations for INCHR commissioners.⁹

5. JS2 and AI stated that the oversight regulatory body established to fight corruption, the Anti-Corruption Commission, was weak, ineffective, underfunded and ill-equipped, and, as it was required to forward all cases to the Ministry of Justice for prosecution, it was also undermined by weaknesses in the justice system.¹⁰

C. Policy measures

6. AI indicated that the Disarmament, Demobilization, Rehabilitation and Reintegration programme (DDRR), had officially closed in July 2009, without adequately demobilizing and reintegrating all former combatants. As a consequence, many of these former combatants had joined militias in other countries in the sub-region.¹¹

7. AI further observed that, despite the stated intentions of the United Nations and the Government in favour of a gender-based approach to DDRR, women and former combatant groups had not been involved in its planning and implementation. Factors such as the reluctance of women and girls to identify themselves as fighters for fear of stigmatization, the fear of reprisals from former male commanders, and the lack of childcare facilities, coupled with the lack of evening classes, had not been taken into account when implementing DDRR. This had hampered the reintegration of women and girls into civilian life.¹²

II. Promotion and protection of human rights on the ground

A. Cooperation with human rights mechanisms

Cooperation with treaty bodies

8. JS2 highlighted that Liberia had yet to submit its initial report to CAT, which it had ratified in 2004.¹³

B. Implementation of international human rights obligations

1. Equality and non-discrimination

9. JS2 stated that there was a need for affirmative action on the part of the Government to address inequalities between men and women, particularly in the area of employment,¹⁴ and that the Government needed to address the traditional, cultural and religious values and practices that discriminate against women, such as early marriages and widows inheritance rights. JS2 stated that the Government appeared not to be firmly committed to allocating a budget to tackle these issues.¹⁵

10. JS2 stated that discrimination against women, particularly in relation to the prevalence of female genital mutilation (FGM), and the lack of information on women's rights, contributed to the high incidence of violence against women.¹⁶

11. JS2 stated that the percentage of women participating in the political decision-making process was still below fifteen percent.¹⁷ AI noted that the Government had encouraged gender parity in ministries, on the Supreme Court and within local government.¹⁸

2. Right to life, liberty and security of the person

12. WCADP recalled that in September 2005, Liberia had signed and acceded to ICCPR-OP2.¹⁹ It noted however, that on 16 July 2008, Liberia's Senate had passed a bill making armed robbery, terrorism and hijacking capital offenses where they result in death, justifying the return of the death penalty on the basis that the Legislature had never ratified ICCPR-OP2 and was therefore not bound by the international obligations arising under this instrument.²⁰ WCADP and AI stated that this law directly violated Liberia's obligations under the ICCPR-OP2,²¹ and JS2 called on Liberia to bring its legislation in line with these obligations.²² HRW recommended that Liberia repeal the aforementioned law.²³

13. WCADP stated that cases in 2009 and 2010 in which the death penalty had been imposed raised concerns about the possibility of innocent people being sentenced to death by a legal system intimidated by mob justice campaigns.²⁴ WCADP urged Liberia to respect its international commitment and suspend executions; to gain popular support for the abolition of the death penalty by informing the general public that the death penalty was not an effective crime prevention tool and that its abolition would enable Liberia to respect its existing international commitments; and, in line with its accession to the ICCPR-OP2, to commit to a vote in favour of the United Nations General Assembly Resolution on a moratorium on the death penalty, to be tabled in December 2010.²⁵

14. JS2 stated that torture continued to be practiced in the Liberian criminal justice system, especially in the Intelligence Division of the Criminal Investigation Department, the National Security Agency and the Bureau of Immigration and Naturalization, even though Liberia had ratified CAT in 2004. It claimed that there was no effort on the part of the Government to make torture a crime in its domestic law.²⁶

15. HRW stated that the lack of public confidence in the police and judicial system had led to mob attacks on police stations and courts either to free or attack suspects, as well as incidents of “vigilante justice” which had claimed the lives of several people.²⁷

16. AI stated that prisons remain understaffed, overcrowded, and that access to food, water, hygiene or medical services was restricted. Security in prisons was also poor, which frequently resulted in prisoner escapes. Women and juveniles were often subjected to abuse by guards and fellow inmates. In 2009, half of the country's prisoners had been held at Monrovia Central Prison, which operated at four times its capacity due to the large number of pre-trial detainees. Men and women were held together, as were juveniles and adults, and pre-trial detainees with convicted prisoners.²⁸

17. JS2 stated that a number of detention facilities were not always accessible to human rights monitoring groups, NGOS or other institutions. It asserted that there were no in-prison rehabilitation programs for inmates, and physical activities and general welfare programs were not available. JS2 claimed that medical facilities and services within prisons and detention centres needed immediate attention, and that prolonged pre-trial detention contributed to the overcrowding of detention centres.²⁹

18. JS2 stated that the Government, rather than effectively addressing human trafficking, subsidized many of the orphanages that were engaged in human trafficking. JS2 claimed that although a moratorium on the adoption of children had been declared, the problem of human trafficking continued to grow due to a lack of appropriate legislation.³⁰

19. GIEACPC observed that, following examination of the state party's initial report in 2004, the Committee on the Rights of the Child had recommended that the Government explicitly prohibit corporal punishment in all settings, including in the family.³¹ It stated that in Liberia corporal punishment remained lawful in homes, schools and alternative care settings and that the provisions against violence and abuse in the Penal Code (1976) and the Constitution (1986) were not interpreted as prohibiting corporal punishment of children.³² GIEACPC noted that a new Children's Act had been passed in 2009, but indicated that it had no details of the provisions of this legislation. GIEACPC stated that corporal punishment was explicitly prohibited as a disciplinary measure in prisons in the Criminal Procedure Code, but that it had no information on the legality of corporal punishment in other institutions accommodating children in conflict with the law.³³

20. AI stated that widespread child abuse continued with an increase in reports of sexual violence against children.³⁴

21. AI also indicated that female genital mutilation was traditionally performed on young girls, particularly in rural areas, as part of initiation rites, noting that domestic law did not specifically prohibit this practice.³⁵

22. AI stated that child labour was widespread in its worst forms, which included hazardous labour in the alluvial diamond industry and child prostitution. It indicated that, while employment and apprenticeship of children under the age of 16 during school hours was prohibited, the Ministry of Labour's Child Labour Commission was ineffective in enforcing the relevant law in this regard.³⁶

3. Administration of justice, including impunity, and the rule of law

23. AI and HRW noted widespread violations of fair trial and due process rights.³⁷ HRW attributed these violations to insufficient judicial personnel, limited court infrastructure and logistics, archaic rules of procedure and poor case management.³⁸ HRW and AI stated that as a consequence of the courts' inability to adequately process their cases, hundreds of prisoners were held in extended pre-trial detention in overcrowded detention centres that lacked basic sanitation and health care.³⁹ AI stated in 2009 that about

92 per cent of persons in prisons were pre-trial detainees.⁴⁰ HRW recommended that Liberia (i) undertake a thorough review of cases of all individuals currently detained in order to determine which prisoners were being held illegally in extended pre-trial detention; (ii) ensure adequate funding and long-term government support to the judiciary, including sufficient court personnel; and (iii) ensure that all accused are brought to trial within a reasonable time and that authorities apply “special diligence” in trying cases where the accused is in pre-trial detention.⁴¹

24. JS2 stated that there was a lack of strict adherence to the criteria for the appointment of judges.⁴² It indicated that there was a need for effective self-regulation by the judiciary to investigate judicial impropriety, corruption and lawyers’ professional misconduct.⁴³ In this regard, constitutional and judicial reforms were required, which should also address budgetary requirements of the judiciary, including the salaries of judges.⁴⁴

25. JS2 stated that the incorporation of international legal standards into domestic laws would assist the judiciary in carrying out its responsibilities and also affirm the Government’s adherence to the rule of law.⁴⁵ It stressed that the judiciary would benefit from better training on human rights issues.⁴⁶

26. JS2 indicated that the National Bar Association was not functioning well and that it should identify and address the concerns of its membership.⁴⁷

27. HRW stated that, due to the absence or distrust of judicial authorities, serious abuses resulting from harmful traditional practices continued to occur in Liberia. These abuses included the killing of alleged witches and “trials by ordeal,” in which suspects were forced to swallow the poisonous sap of a tree or endure burning, so that their alleged guilt or innocence would be determined by whether they survive. These local practices often involved extortion, the extraction of statements under torture, and other forms of physical and sexual assault.⁴⁸ AI stated that the operation of customary courts raised concerns, particularly in relation to “trials by ordeal”.⁴⁹ HRW recommended that the Government instruct the police and public prosecutors in all counties to arrest and prosecute those who engage in harmful traditional practices.⁵⁰

28. HRW drew attention to reports of detainees being subjected to physical abuse by policemen, including torture, with only a few of those cases resulting in internal investigations, suspension or prosecution.⁵¹ HRW recommended that Liberia: (i) explicitly inform all ranks of the police and other security services that all those implicated in corruption, theft, extortion, or other abuses will be held accountable; and (ii) enhance the capacity of the judiciary, as part of broader judicial reform, to hold accountable those within the police and other security services who commit such abuses.⁵²

29. JS2 stated that, even though rape was criminalized in the country most rape cases were not fully prosecuted.⁵³ HRW noted that efforts to prosecute these cases continued to be hampered by deficiencies in the justice system. HRW recommended that Liberia reinforce specialized police units to investigate cases of rape and other sexual violence and ensure the protection of victims; and that the capacity of the judicial body specializing in sexual violence be increased by establishing specialized courts in all 15 counties, so as to ensure expedient processing of cases for victims of rape and other sexual assault in rural areas of the country.⁵⁴

30. AI stated that children in conflict with the law continued to be addressed inappropriately, due to the absence of a functional juvenile justice system.⁵⁵

31. AI stated that little progress had been made in bringing to justice those people allegedly responsible for serious human rights violations during the conflicts in Liberia. It noted however that the case on charges of war crimes against former President Charles Taylor at the Special Court for Sierra Leone in The Hague, as well as the trial of Charles

“Chuckie” Taylor, Jr. in another country had been very significant steps. AI further noted that Benjamin Yeaten, a former general of the National Patriotic Front of Liberia (NPFL), had been indicted for murders, but was allegedly in hiding in another country.⁵⁶

32. AHR state that, in spite of the recommendations of the Truth and Reconciliation Commission of Liberia (TRC), as published in its consolidated final report in December 2009, Liberia had not prosecuted those allegedly responsible for serious violations of international law.⁵⁷ Although there appeared to be significant support for prosecution in Liberia as well as in the Diaspora, serious questions remained regarding the political will of both the Government and the international donor community to establish accountability mechanisms.⁵⁸ AHR stated that efforts to establish an accountability mechanism were further complicated by weaknesses within the justice system, including a lack of qualified prosecutors and defence lawyers, a lack of training for judges and magistrates, corruption in the judiciary, the shortage of available prison space, and a lack of minimum human rights standards in prisons.⁵⁹

33. AHR stated that Liberia should undertake an evaluation of all possible options for the prosecution of alleged violations of human rights and humanitarian law committed during the conflict. In this regard it recommended that Liberia (i) accept the jurisdiction of the International Criminal Court over crimes allegedly committed after entry into force of the Rome Statute (1 July 2002) but before Liberia’s date of ratification of the Rome Statute (22 September 2004); (ii) prosecute alleged perpetrators in existing regional mechanisms, in foreign domestic jurisdictions in which they are physically present and in traditional and customary justice mechanisms that comply with international human rights standards; (iii) seek assurances from other countries that protective status, including diplomatic asylum, would not be extended to persons accused of crimes under international law; and (iv) create an extraordinary criminal court as recommended by the TRC and ensure that it complies with international standards.⁶⁰

34. HRW noted the recommendation made by the TRC to establish a hybrid international-national tribunal and stated that serious questions remained about the political will of both, the Government and the international donor community, with regard to establishing such a tribunal.⁶¹ In this regard, HRW recommended that Liberia put in place an independent mechanism free from external influence that can fairly and efficiently ensure justice and prosecution of the “persons most responsible,” such as those in political or military leadership roles and those who allegedly committed the most severe crimes. The mechanism should be able to conduct trials in accordance with fair-trial standards as provided for in the statutes of existing international and hybrid courts and the ICCPR.⁶²

35. AI asserted that impunity remained a serious concern and that even high-level officials had allegedly engaged in or ordered beatings, looting, arbitrary arrests, abductions, shootings, ritualistic killings and other abuses. Furthermore, police officers and security officials were reported to have employed torture and other forms of ill-treatment. In most cases, no investigations had been carried out and no action had been taken against the alleged perpetrators.⁶³

36. HRW stated that corruption involving public officials had been recognized as having contributed to political instability and failure to provide the country’s most vulnerable with basic services such as education, water and health care. Steps had been taken to reduce corruption and an Anti-Corruption Commission had been established.⁶⁴ In this regard, HRW recommended that Liberia strengthen the efforts of the Anti-Corruption Commission to investigate allegations of corruption by government personnel and publicly expose their findings; encourage all government officials to publicly declare their assets in accordance with relevant requirements; and create a special fast-track court dedicated to the adjudication of corruption-related cases.⁶⁵

4. Right to privacy

37. JS1 stated that Liberia maintained criminal sanctions against sexual activity between consenting adults of the same sex, even though laws prohibiting such activity had been found to constitute a clear violation of international human rights law.⁶⁶ It recommended that the Human Rights Council, in its upcoming review, urge Liberia to bring its legislation into conformity with its international human rights obligations by repealing all provisions which criminalize sexual activity in private between consenting adults of the same sex.⁶⁷

5. Right to work and to just and favourable conditions of work

38. IHRB stated that Liberia's private employment sector continued to suffer from a number of shortfalls impacting on Liberia's human rights obligations under international law. These included inadequate monitoring of safety standards in rubber plantations, including protection of workers from hazardous materials; the use of child labour in rubber plantations, agriculture and the alluvial diamond industry; the reliance on an informal and casually employed workforce at less favourable working and living conditions; the lack of legislation guaranteeing workers adequate protection against anti-union discrimination; and the lack of adequate safeguards to ensure labour rights for the high proportion of women employed in the informal sector.⁶⁸

39. IHRB stated that the Government's bargaining position with multinational companies was weak, which allowed for exploitative practices by some companies. It indicated that foreign companies operating in Liberia under concession contracts had frequently been found to be in contravention of the concession terms specified in their contracts, such as providing housing or education for workers' families on plantations and contributing to national programmes on infrastructure development. IHRB stated that stronger negotiation and enforcement of concession contracts by the Government would benefit the Liberian population.⁶⁹

40. IHRB pointed out that provisions for private security contractors in some concession contracts negotiated by the Government with multinational national companies were inconsistent with Liberia's private security agency guidelines. It explained, by way of example, that private security contractors engaged by the management of rubber plantations were reported to have committed human rights abuses, such as illegal detention in their own facilities after having made temporary arrests.⁷⁰

41. IHRB recommended that Liberia: (i) develop a national strategy and/or Business and Human Rights Policy framework on the implementation of the UN endorsed Protect, Respect, Remedy framework⁷¹ and suggested that the Liberia Corporate Responsibility Forum might be an appropriate platform for this purpose;⁷² (ii) ensure that greater resources are directed towards the reform of, and monitoring compliance with, the labour laws;⁷³ (iii) prioritize action to address the concerns raised by UN human rights treaty bodies as to the situation of women working in the private sector, as well as the high number of women in the informal sector, and the lack of rights and social benefits, including maternity protections, available to them;⁷⁴ (iv) implement the pending "Decent Work legislation" that reflects the developing norm on labour markets contributing to sustainable development;⁷⁵ (v) review all city ordinances and other relevant local legislation to ensure consistency with international legal obligations;⁷⁶ (vi) prioritize economic development, poverty reduction and human rights based approaches including steps to ensure the implementation of human rights due diligence processes by companies in future negotiations of concession contracts;⁷⁷ and (vii) ensure that concession contracts providing for private security contractors are consistent with the private security agency guidelines and Liberia's obligations under international law, including relevant UN principles on the use of force, and are enforced accordingly.⁷⁸

6. Right to social security and to an adequate standard of living

42. AI stated that maternal mortality remained high and appeared to have increased from 578 deaths in 2000 to 994 deaths in 2007 per 100,000 live births, due to an acute shortage of skilled labour, inadequate emergency obstetric care, inefficient referral systems, poor nutritional status of pregnant women and very high numbers of teenage pregnancies. The Government had pledged to address the high maternal mortality rate and had made certain commitments in that regard, all of which had yet to be implemented. AI stated that despite the Government's pledge to maintain the suspension of medical fees for pregnant women until the socio-economic situation improved, many pregnant women seeking access to care still paid medical fees, which in some cases were excessive.⁷⁹

43. JS2 stated that Liberia did not provide treatment for individuals living with HIV/AIDS.⁸⁰

44. AI asserted that many children including former combatants and unaccompanied IDPs lived on the streets, especially in Monrovia. It stated that orphanages faced difficulties in providing basic sanitation, adequate medical care and appropriate diet, and that many orphans lived outside these institutions.⁸¹

7. Right to education

45. JS2 highlighted that school buildings and facilities were lacking, and that in some cases schools were not easily accessible and children were required to walk for two to three hours to reach them.⁸² It asserted that despite these circumstances, the Government's budgetary allocation for education was only nine percent. JS2 noted that Liberia was a signatory to the CRC and that in it had also signed a protocol on the provision of free and compulsory primary education, in Dakar, Senegal in 2000.⁸³

46. JS2 stated that human rights education was not a significant aspect of Government programs.⁸⁴

8. Refugees and asylum-seekers

47. AI stated that since 2004, out of a total registered refugee population of 233,264, 168,792 Liberians had returned home, noting that unofficial returns were uncounted. AI further indicated that many returnees faced destitution, with scarce job opportunities, lack of access to land, shelter and water in addition to lack of basic services, such as health care and education.⁸⁵

9. Internally displaced persons

48. AI stated that a large number of internally displaced people and refugees were in need of resettlement, and that international and local humanitarian agencies struggled to provide the services needed.⁸⁶ Some returnees had been internally displaced because their property had been appropriated by others. Violent and sometimes lethal land disputes frequently arose between returning land owners who had fled the war and internally displaced people who had taken over their land. These conflicts were often exacerbated by unclear land titles.⁸⁷

III. Achievements, best practices, challenges and constraints

N/A

IV. Key national priorities, initiatives and commitments

N/A

V. Capacity-building and technical assistance

N/A

Notes

- ¹ The stakeholders listed below have contributed information for this summary; the full texts of all original submissions are available at: www.ohchr.org. (The asterisk denotes a non-governmental organization in consultative status with the Economic and Social Council.)

Civil society

GIEACPC	Global Initiative to End Corporal Punishment of Children, United Kingdom
HRW	Human Rights Watch, Geneva, Switzerland.*
WCADP	World Coalition against the Death Penalty, France.
AHR	The Advocates for Human Rights, Minneapolis, USA.*
IHRB	Institute for Human Rights and Business, UK.
JS1	International Lesbian, Gay, Bisexual, Trans and Intersex Association, International Gay and Lesbian Human Rights Commission and ARC International, joint submission, Geneva, Switzerland.
JS2	Liberia Coalition of Human Rights Defenders, Research & Documentation Center on Human Rights, Human Concern, Liberia Technical Committee EFA, National Association of Concern Youth Organization of Liberia, Zorzor District Women Care, Human Rights Protection Forum, Rescue Alternative Liberia and West Africa Human Rights Defenders Network, joint submission, Geneva, Switzerland.
AI	Amnesty International, London, UK.*

² JS2, p. 5.

³ JS2, p. 7.

⁴ JS2, p. 2.

⁵ IHRB, p. 2.

⁶ IHRB, p. 2.

⁷ HRW, p. 3.

⁸ HRW, p. 3.

⁹ HRW, p. 5.

¹⁰ JS2, p. 4; AI, p. 3.

¹¹ AI, p. 3.

¹² AI, p. 4.

¹³ JS2, p. 3.

¹⁴ JS2, p. 5.

¹⁵ JS2, p. 5.

¹⁶ JS2, P. 5.

¹⁷ JS2, p. 5.

¹⁸ AI, p. 3.

¹⁹ WCADP, para. 2.

²⁰ WCADP, para. 3.

²¹ WCADP, para. 6; AI, p. 5.

²² JS2, p. 2.

²³ HRW, p. 4.

²⁴ WCADP, para. 5; *See* submission for cases cited.

²⁵ WCADP, para. 6; *See* submission for cases cited.

²⁶ JS2, p. 3.

- 27 HRW, p. 4.
- 28 AI, p. 5.
- 29 JS2, p. 4.
- 30 JS2, p. 2.
- 31 GIEACPC, para. 2.
- 32 GIEACPC, para. 1.
- 33 GIEACPC, para. 1.
- 34 AI, p. 5.
- 35 AI, p. 5.
- 36 AI, p. 5.
- 37 AI, p. 4; HRW, p. 4.
- 38 HRW, p. 10.
- 39 HRW, p. 3; AI, p. 4.
- 40 AI, p. 5.
- 41 HRW, p. 10.
- 42 JS2, p. 6.
- 43 JS2, p. 6.
- 44 JS2, p. 6.
- 45 JS2, p. 6.
- 46 JS2, p. 6.
- 47 JS2, p. 6.
- 48 HRW, pp. 2–3.
- 49 AI, p. 6.
- 50 HRW, p. 5.
- 51 HRW, p. 2.
- 52 HRW, p. 4.
- 53 JS2, p. 5.
- 54 HRW, p. 5.
- 55 AI, p. 5.
- 56 AI, p. 4.
- 57 AHR, para. 8.
- 58 AHR, para. 9.
- 59 AHR, para. 10.
- 60 AHR, paras. 16–19.
- 61 HRW, pp. 1–2.
- 62 HRW, p. 4.
- 63 AI, p. 4.
- 64 HRW, p. 3.
- 65 HRW, p. 4.
- 66 JS1, p. 1.
- 67 JS1, p. 2.
- 68 IHRB, pp. 2–3.
- 69 IHRB, p. 3.
- 70 IHRB, p. 3.
- 71 IHRB referred to A/HRC/8/5.
- 72 IHRM, pp. 3–4.
- 73 IHRM, pp. 3–4.
- 74 IHRM, pp. 3–4.
- 75 IHRM, pp. 3–4.
- 76 IHRM, pp. 3–4.
- 77 IHRM, pp. 3–4.
- 78 IHRM, pp. 3–4.
- 79 AI, p. 5.
- 80 JS2, p. 2.
- 81 AI, p. 5.
- 82 JS2, p. 3.

⁸³ JS2, p. 3.

⁸⁴ JS2, pp.1–2.

⁸⁵ AI, p. 6.

⁸⁶ AI, p. 6.

⁸⁷ AI, p. 6
