
IN THE INTER-AMERICAN COURT OF HUMAN RIGHTS

CASE OF LUCIANO BENÍTEZ

PETITIONERS

v.

THE REPUBLIC OF VARANÁ

RESPONDENT

MEMORIAL FOR THE STATE

through its subsidiary Lulo, also owns LuloNetwork, a social media network that allows users to interact using both personal and public profiles (“blogs”), as well as a mapping application called “Lulocation”⁷.

LUCIANO BENÍTEZ

Luciano Benítez, a direct descendant of the Payas, was born in the small coastal city of Río del Este on August 5, 1951. This city holds the most famous celebration of the Sea Festival, an age-old tradition of Paya origin that pays homage to the gods of the ocean, with over 800,000 visitors flocking to the city during the month of November⁸.

In 1968, Luciano left for the capital, Mar de Luna, where he became a father and grandfather. He worked there from 1974 until his retirement in 2014. Since young, Luciano has and involved in protecting the environment and preserving Paya culture. He regularly participated in meetings of Paya activists to discuss the government’s environmental policies and the actions of private companies and opposed

network, he started using switched from Moving Guide to Lulocation¹⁰. From this point, he became a regular user of the app, using it daily.

LULONETWORK

Luciano had used LuloNetwork since February 7, 2010, when he got his first smartphone. He used his social media account to organize protests and disseminate information. As one of the main opponents of a project by Eye to build a large industrial complex on the outskirts of his hometown, he used his “blog” to spread information about this project and subsequent protests¹¹. He also used his profile to discuss issues that he considered of interest to his neighborhood in the capital and to his hometown. Consequently, his blog gained over 80,000 fans and Luciano became a well-known figure¹².

On October 3, 2014, Luciano received screenshots allegedly showing illegal payments by Holding Eye to a government official, as well as confidential internal memos from the company stating the

his source. Luciano appealed his interlocutory order but still attended the hearing on December 5, 2014. During the hearing, Eye asked Luciano “Who gave you the information about the company?”. In response, Luciano asked the Judge “Do I have to answer?” and the Judge replied, “The decision is up to you, but if you answer, this case may be over faster.” With this clarification, Luciano answered and revealed the email account he had contacted to obtain the information he published¹⁵. Afterward, Eye asserted at the hearing that this information was sufficient to identify the source and protect its rights and withdrew all its claims on December 8, 2014¹⁶.

Since the source was revealed and the case was moot, the appellate court dismissed the appeal filed by the NGO Blue Defense on behalf of Luciano. A request for clarification was filed, stating that even though the case is closed, it was in Luciano’s interest as one objective of the appeal was for the court to find that Luciano was indeed a journalist. The Court denied this motion on the grounds that it was not procedurally necessary to continue with the case, since the origin of the controversy had been resolved and to continue to process the case would undermine procedural economy and create a needless backlog in the courts.

A few weeks after the hearing, on February 4, 2015, the user of the email address whistlewhistle@pato.com approached him. The man informed Luciano that he was fired from his position as a junior lawyer at Eye’s legal department and held liable for the breach of his confidentiality agreement with Eye. He was being sued in a confidential legal action for R\$400,000 and feared that he might be charged criminally. Hearing this information, Luciano was very upset and stopped posting on his blog for several days¹⁷.

¹⁵ Hypo, [41]

¹⁶ Hypo, [42]

¹⁷ Hypo, [43]

THE ARTICLE

On December 7, 2014, Federica Palacios, journalist and blogger for the state-owned digital media outlet VaranáHoy, published an article entitled “Luciano Benítez: Environmental Fraud and Partner of Extractivists?” on her personal LuloNetwork blog, “Inconsistencies Revealed,” and in the online newspaper VaranáHoy¹⁸.

Federica based her article on information given to her by an anonymous source but still met all the requirements of truthfulness and impartiality. She verified that the information was accurate and unmodified through a systems engineer and other sources. Lastly, she contacted Luciano to give him the opportunity to dispute the content of the article, but he refused to read or be part of the article¹⁹.

The contents of the article revealed places Luciano has frequented for readers to draw their own conclusion about him²⁰:

- (1) On August 16, 2014, Luciano marched in support of Holding Eye’s Varanatic operations, following the route from where it convened to exactly where it ended.
- (2) On the Wednesdays in August 2014, Luciano was present at the Carrera 90 Building, where David Murcia's campaign headquarters are located. David Murcia’s is a National Assembly candidate known for his association with Holding Eye and the extractive sector.
- (3) In September 2014, Luciano met David Murcia's legislative aide, Roberto Parra, for lunch at Cecilia pizzeria and Origen restaurant. An unnamed woman was also present.

¹⁸ Hypo, [44]

¹⁹ Hypo, [45]

²⁰ Hypo, [46]

- (4) Luciano engaged with all 257 of Holding Eye's LuloNetwork posts, including expressing discontent, thereby increasing their visibility.

This article quickly spread across various internet platforms and gained traction on radio and television within 24 hours, sparking widespread discussion among Varanásians²¹. Luciano was subsequently removed from all the groups he belonged to on his instant messaging apps and his prominence among environmental advocates and Payas decreased²².

On December 10, 2014, Luciano published a statement on LuloNetwork denying the assumptions that arose from Federica's article. He clarified that it was his granddaughter that attended the march while using his cell phone. His presence at Carrera 90 Building can be explained as it is where his reading group was held. Thirdly, his granddaughter and Roberto was dating and she wanted her grandfather to spend time with her. On December 11, 2014, Federica amended her article, stating that Luciano presented his version of the story and provided a link to his statement²³.

Despite this effort, his credibility remained tarnished, leading him to consider creating an anonymous account on the popular platform Nueva to protect his honor. He wanted to publish the facts under a pseudonym to rehabilitate his life, name and reputation²⁴. However, under Law 22 of 2009, Nueva required him to attach a photo of his national ID. Nueva's notice stated that under the public action of unconstitutional 1010/13, the court held that online social networking platforms must have accurate and sufficient information to identify all active users. The notice also stated that it was possible to create a public username and an "@" that did not match the name on

²¹ Hypo, [47]

²² Hypo, [49]

²³ Hypo, [51]

²⁴ Hypo, [55]

the national ID card but the account would privately still be associated with the “identity stated on

recognized. This right also protects companies; the court in *Uson Ramirez* recognized that the protection of the right to the reputation of companies is a legitimate purpose to restrict the right to the freedom of expression³⁵. Thus, it is legitimate for Holding Eye to resort to the judicial mechanisms established by Varaná to protect its honor when its reputation had been affected. *Kimel v Argentina* held that every fundamental right is to be exercised with regard for other fundamental rights³⁶. Thus, the right to freedom of expression and thought should ultimately be balanced with the right to honor. In this case, the right to honor should prevail because no restriction was placed on Lucaino's freedom of expression.

Luciano's speech should not be accorded the special measure of protection because he is not a journalist.

This Court has highlighted that it is essential that journalists enjoy the necessary protection and independence to exercise their functions comprehensively³⁷. Although the Court has yet to define the term "journalists", AO OC-5/58³⁸ opined that journalism cannot be limited to merely granting a service to the public through the application of some knowledge or training acquired in a university or through those who are enrolled in a certain professional "colegio". It is submitted that in considering whether an individual is a journalist, "a certain occupational tendency should be required, i.e. a journalist typically works regularly and receives some form of remuneration for his

³⁵ *Usón Ramírez v. Venezuela*, Preliminary Objection, Merits, Reparations, and Costs, Judgment, Inter-Am. Ct. H.R. (ser. C) No. 207, para. 65

³⁶ *Kimel v. Argentina*, Merits, Reparations, and Costs, Judgment, Inter-Am. Ct. H.R. (ser. C) No. 177, (May 2, 2008)("Kimel"), para 74

³⁷ Thomas M. Antkowiak and Alejandra Gonza, *The American Convention on Human Rights* (OUP 2017), pg 240

³⁸ *Compulsory Membership in an Association Prescribed by Law for the Practice of Journalism* (Arts. 13 and 29 of the American Convention on Human Rights), Advisory Opinion OC-5/85, November 13, 1985, Inter-Am. Ct. H.R. (Ser. A) No. 5 (1985). ("AO OC-5/58"), [71]

or her work”³⁹. This more limited scope of defining a journalist is necessary to balance conflicting rights and values, such as the right to freedom of expression and thought and the right to honor.

Applying the above to the facts, Luciano uses his “blog” profile on LuloNetwork to promote causes that he is interested in. However, his activity on social media is not his occupation, nor does he receive remuneration for his blog posts on this platform. Therefore, Luciano should not be considered a journalist, and his article should not enjoy a special measure of protection.

In any event, Varaná would have been justified in imposing subsequent liability under Article 13(2).

The requirements for the imposition of subsequent liability are threefold⁴⁰:

- a. [the sanction] must be expressly established by law, in both the formal and substantial sense;
- b. it must respond to either the respect for the reputation of others or protection of national security, public order or public health or morals; and
- c. it must be necessary in a democratic society (and to this end must comply with the requirements of suitability, necessity and proportionality)

The first requirement requires every limitation to freedom of expression to be established in advance, expressly, restrictively and clearly in a law⁴¹ – in the formal and material sense. This requirement is met as the tort action brought against Luciano was previously and expressly

³⁹ Council of Europe Committee of Ministers, *Explanatory Memorandum to Recommendation No. R (00) 7 of the Committee of Ministers to member states on the right of journalists not to disclose their sources of information*, [13]

⁴⁰ *Supra*, note 37, pg 247

⁴¹ AO OC-5/58 (n 38), [39]-[40]

established by law. The second requirement was also met as the lawsuit was in response to the respect for the reputation of Holding Eye.

The last requirement of “necessary in a democratic society” is met as well. To determine the suitability of the measure, the court considers whether the restriction is a suitable or adequate means to help achieve a legitimate purpose established in the Convention⁴². For the test for the necessity of the measure, the Court will weigh alternatives for achieving the restriction’s legitimate purpose in order to establish if there is a less restrictive way to achieve the purpose⁴³. The

of necessity is applied when dealing with expressions regarding these issues.⁴⁷In applying the test of proportionality, the right to honor and reputation must be balanced against the interests of an open debate on public affairs.

On the facts, this tort action was suitable as an imposition of damages is a suitable means of compensation for the loss of reputation due to his article. It was the least restrictive way to address the loss of reputation because, as opposed to requiring to remove the harmful article, he would be able to keep his article up on his blog. Furthermore, this is proportionate as the damage was done to Holding Eye's reputation and does not require the Court to impose a more extreme order such as removing the blog post or banning his blog. Thus, both the right to honor and reputation and interests of open debate on public affairs would be upheld. Although the quantum of the damages the company was seeking was large, Luciano posted his article on his account with 80,000 fans,

Varaná complied with Articles 8 and 13 when Luciano had revealed the source of his LuloNetwork posts in a civil lawsuit;

(1) i. Luciano does not have the right to keep his source of information confidential under Article 13 as he was not a social communicator. In any event, he revealed his source on his own accord.

Principle 8 of the Declaration of Principles on Freedom of Expression states that “every social communicator has the right to keep his/her source of information, notes, personal and professional archives confidential”. The court has recognized individuals as social communicators when it is

benefits of revealing this source, he chose to answer and reveal the email account on his own accord without sanctions by the state⁵².

Varaná complied with its duty of fair trial under Article 8 because the court was objective and impartial. v4)iavinnemm

In the same vein, an effective remedy for the present case would be one that can effectively end the violation of the right to privacy, to deter repetition of hacking, and to fairly compensate the

Or in *Granier v Venezuela*, the State had refused to renew the license of RCTV, a television broadcast that had criticized the government. It was held that both the individuals associated with RCTV and the Venezuelan society who were completely deprived of access to the station's point of view had their right infringed upon.

Conversely, this is a case of allowing cell phone carriers in a free market to offer benefits to make their plans more attractive. This practice is prevalent and allowed in many countries, such as mobile companies in South American countries such as Brazil, Chile, Colombia, and Ecuador offer Zero-Rating Applications. For example, Movistar, Claro, Tigo, Oi, TIM, CNT, and others offer a data-capped bundle of access to WhatsApp, Facebook, and Instagram on a sliding scale from 24 hours to one month⁵⁹. Zero-rating apps should not be held to be an indirect restriction, as it merely makes access to certain applications easier but does not restrict individuals from accessing other applications. Users in Varaná are still easily able to access competitor's social networks, platforms, or navigating apps. Even though the P-Mobile plan offered Luciano all the apps available from Lulo free on his mobile plan, it is evident that Luciano still has the ability to access competitors such as Nueva. Even if the provision of zero- application apps allowed Lulo to decide what information that users are receiving, they can still freely receive information on other service providers. Thus, individuals still retain their freedom to impart or receive information on other platforms and there was no indirect restriction imposed.

Moreover, it is argued that zero - rating apps reduce the digital divide, thereby promoting the freedom of expression. Principle 2 of the Dsso6(tw)4()-10(an)1(s)-1(s)-1(o6(tw)4w -14.28 -5(e)6(s)u(t)-2(a)4)4

information by any means of communication without any discrimination for reasons of economic status among others. Allowing zero-rating applications increases access to information and presents opportunities for people to express themselves through social networks or other platforms. This in turn accelerates the process of social mobility⁶⁰, and the freedom of assembly and association online.

(v) Varaná had complied with Article 5, 11 and 13 when refusing to order the de-indexing of the news article “Luciano Benítez: Environmental Fraud and Partner of Extractivists?”

a. Varaná had complied with Article 5 as the refusal to order the de-indexing of the news article is not torture or degrading treatment.

i. Varaná’s refusal to order the de-indexing did not cause torture against Luciano

Above all, Varaná was not involved in the negative public reaction against the news article. Since the state should not be responsible for the independent acts of private individuals⁶¹, whom in the current case refer to those who attacked Luciano online and removed him from instant-messaging groups, Varaná’s refusal to de-index the news article did not cause torture against Luciano.

In the alternative that State’s involvement is disregarded, Varaná’s refusal to order the de-indexing did not constitute as torture. To make out torture, two elements must be fulfilled: (i) intentional, (ii) causes severe physical or mental suffering⁶².

Firstly, the psychological harm suffered by Luciano was not intentionally inflicted. Torture must be carried out intentionally. Intentionality requires that “the acts committed were deliberately

⁶⁰ Background and Interpretation of the Declaration of Principles by Special Rapporteurship for Freedom of Expression, <https://www.oas.org/en/iachr/expression/showarticle.asp?artID=132&IID=1> ,[9]

⁶¹ League of Nations, Official Journal, 4th Year, No. 11 (November 1923), p. 1349.

⁶² Espinoza Gonzales v. Peru, Preliminary Objections, Merits, Reparations, and Costs, Judgment, Inter-Am. Ct. H.R. (ser. C) No. 289, para. 143 (Nov. 20, 2014)

inflicted upon the victim and not the result of negligent conduct, an accident or force majeure”. In other words, there must be an intention to cause, or substantial grounds for believing that the individual concerned faces a real risk of being subjected to, physical or mental pain or suffering as a necessary element of the act⁶³. In this case, Varaná had not committed any act that had deliberately inflicted upon the victim psychological harm.

Secondly, the psychological harm does not pass the threshold of severity required. A multi-factorial test including objective and subjective factors is applied. Objective factors include the characteristics of mistreatment, duration, methods or manner used to inflict harm, physical and psychological effects such harm may cause. Subjective factors include the age, gender, and health condition of the individual. Objectively, the mistreatment he endured—stemming from legal challenges, defamation, and social media harassment—lacks the intensity, systematic abuse, or physical violence typically associated with severe psychological harm in human rights contexts. Furthermore, while Luciano's experiences were prolonged, the intermittent nature and the lack of direct physical threats or violence mitigate the overall psychological impact. Subjectively, Luciano's older age may have increased his vulnerability to distress; however, without more severe factors such as a pre-existing health condition that significantly elevated his susceptibility to harm, his experience does not meet the high threshold of severity required by international standards. His psychological effects, including undergoing treatment for depression and social isolation, are significant yet must be contextualized within the broader spectrum of psychological harm, noting that not all forms of distress meet the stringent criteria for a human rights violation. As such, Luciano's psychological suffering was not severe enough to amount to torture.

⁶³ *Chahal v. United Kingdom*, European Court, (1996) 23 EHRR 413, at 457.

ii. Varaná's refusal to de-index is not a degrading treatment.

By definition, treatment which grossly humiliates an individual before others or drives him to act against his will or conscience is 'degrading'⁶⁴. More specifically, in the European case of *Ireland v. United Kingdom*, degrading treatment was defined as treatment capable of "arous[ing] in [the] victims feelings of fear, anguish and inferiority capable of humiliating and debasing them and possibly breaking their physical or moral resistance⁶⁵." This test has been supported in recent rulings⁶⁶. It can be reasonably inferred that the standard to find a treatment degrading is fairly high.

On the facts, Luciano's associations with the opposing party from the side he claimed to be leaning towards reasonably raise suspicion from the public regarding his moral character. The public reaction that transpired was also reasonable based on the level of shock and blameworthiness presented by the news article. Moreover, the identity of Luciano as a internet personality should also be recognised as widening the limits of acceptable criticism because as an internet celebrity , he inevitably and knowingly lay himself open to close scrutiny of their acts, both by the press and bodies representing the public interest⁶⁷. Therefore, Luciano was expected to be subjected to a wider range of acceptable criticism as he was an internet personality instead of an average private individual. As such, when a wide range of acceptable criticism was expected, the refusal of de-indexing cannot be said to be degrading.

b. Varaná's duty to offer protection of the law under Article 11 doesn't arise because there was no arbitrary or abusive interference nor unlawful attacks.

⁶⁴ Denmark et al v. Greece, European Commission, (1976) 12 Yearbook.

⁶⁵ Ireland v. United Kingdom (1978) 2 EHRR 25, at 145

⁶⁶ I. Jayawickrama N. The right to freedom from torture. In: The Judicial Application of Human Rights Law:

The refusal to de-index the news article does not constitute an arbitrary or abusive interference.

Interference that is arbitrary or abusive is one involving an act meant to act unreasonably where reasonable behavior was required or one that involves abuse of power by public bodies⁶⁸.

The State's decision not to de-index the information related to Luciano's name is a testament to its commitment to reasoned and fair governance. Through thorough legal scrutiny, the State deemed that adequate measures had been taken to address any potential harm to Luciano's reputation. This decision reflects a careful balance between protecting freedom of expression and ensuring the integrity of individuals' reputations. By upholding these principles, the State demonstrates its

first is a) the different threshold of protection for public figures, and b) the public interest in the actions taken.

Firstly, a “public figure” was defined in the US Supreme Court case of *Gertz v Robert Welch*⁷² as an individual who has assumed roles of special prominence in the affairs of a society or thrust themselves into the forefront of particular public controversies to influence the resolution of the issues involved. This definition should be adopted as it takes into account the realities of public figures who enjoy prominence but are not necessarily involved in politics such as celebrities. The court should apply a higher threshold of protection to statements involving public figures as

Secondly, it was held in the Supreme Court judgment of Canada in *Aubry v. Éditions Vice-Versa inc.* that certain aspects of the private life of a person who is engaged in a public activity or has acquired a certain notoriety can become matters of public interest.

malice”⁷⁷. It must be proven that in disseminating the news, (1) the person communicating this information had the specific intent to inflict harm, (2) was fully aware that false news was disseminated or acted with gross negligence in efforts to determine the truth or falsity of such news. In this case, it can be inferred that Federica had not disseminated the news with a specific intent to inflict harm as she met the requirements of impartiality ⁷⁸and contacted Luciano to give the opportunity to dispute the contents of the article. Moreover, the news she had disseminated was true, and she had not acted with gross negligence when determining the truth of the statements. She had taken the information to a systems engineer, who verified the information to be accurate and unmodified. She had also confirmed with other sources and even attempted to confirm with Luciano himself. Thus, any civil sanction imposed on her would be a violation of her freedom of thought and expression, a right that should be upheld due to the importance of her role as a journalist.

d. Varaná’s refusal to de-index the news article is consistent with/does not violate Luciano’s right to reply under Article 14.

i. Luciano was able to exercise his right to reply

Since Luciano was able to and had exercised his right to reply to Federica’s article, the Varaná’s refusal to de-index the news article did not violate his Article 14 rights.. It was suggested in advisory opinion on Art 14⁷⁹ the right is not violated when it fulfils the following conditions: (1)

⁷⁷ AO OC-5-85, [74]-[76]

⁷⁸ Hypo, [45]

⁷⁹ ADVISORY OPINION OC-7/85 OF AUGUST 29, 1986, [37]

published free of charge, (2) as soon as possible, (3) in a location and with an emphasis comparable to that which caused the injury, and (4) without a commentary which would impair its value. [37]

On the facts, one day after Luciano had published his statement on LuloNetwork to deny the assumption that arose from his article on 10 December 2014, Federica added a sentence to her original article. She had pointed out that Luciano presented his version of the story on his social media and provided the link for it. Therefore, the right to reply of Luciano was published free of charge, a mere one day after he had issued his correction in a location with emphasis comparable as it was published in the same article. This reply was also not accompanied by any commentary which would impair its value. Therefore, Luciano's right to reply had not been infringed upon.

Additionally, allowing Luciano the right of reply is "a particularly appropriate remedy in the online environment due to the possibility of instant correction of contested information and the technical ease with which replies can be attached to it⁸⁰". It was highlighted in *Moya Chacon v Costa Rica* that more burdensome measures should not be adopted when the dissemination of inaccurate information could be remedied in a more expeditious and effective manner through the right of reply. Therefore, in upholding Federica's right to freedom of expression, Varaná was justified in not imposing more burdensome measures such as the de-indexing of her article when the appropriate remedy of the right of reply was available and exercised by Luciano.

(vi) Varaná's refusal to acknowledge that Lulook was also responsible for the violation of Luciano Benitez's human rights had complied with Article 25.

As established above, the State's duty under Article 25 only arises where there has been a violation of human rights. Since there has been no violation of Luciano's right to privacy, no judicial recourse was warranted.

In the alternative where a violation of Luciano's right to privacy was found under Article 11, the duty to find Lulook responsible still does not arise under Article 25(1). This is because the publishing of the second installment can be regarded as a prompt and simple recourse that has already rectified the infringement.

On the facts, one remedy was available to the accused and was carried out4(s)(al)59.9 -10(as2a,)-4(o)4-10(

shorter than time taken for a trial, such as the “very efficient” progress of the criminal case related to hacking which took more than half a year to convict the criminals⁸². As such, the remedy should be deemed simple and prompt.

Since a simple and prompt remedy was available, there is nothing else that the State was obliged to do under Article 25 regarding Luciano’s claim. In any event, the State acknowledging the responsibility of LuLook does not address the negative public reactions received by Luciano. Therefore, the State’s refusal to find LuLook responsible, which in itself is a proper decision by a normally functioning of a competent, impartial, and independent court, does not violate Article 25.

⁸² Hypothetical, [63]

such a provision means that no anonymous account can be registered, which is a lawful interception.

b. Varaná complied with the freedom of thought and expression, right of assembly and freedom of association under Article 13,15 and 16 despite prohibiting anonymity

i. No restriction of rights under Art 13, 15 and 16

Technology is integral to the exercise of the right to freedom of assembly, association and expression both as a means to facilitate the exercise of the rights online and offline and as additional virtual and digitally mediated spaces where these rights can be actively exercised⁸⁴. It is submitted that the prohibition of anonymity on social media has not negatively impacted either of the functions.

As elaborate above in paragraph_, an indirect restriction on the freedom of thought and expression is found when victims were deprived of their freedom to impart or receive information. A restriction on the freedom of assembly and association has been found when individuals have faced recourse from the state for exercising their rights. This can be seen in the case of *Women Victims of Sexual Torture in Atenco v. Mexico* where eleven women were arrested in the context of a public demonstration. Similarly, in *López Lone and others Vs. Honduras*, restrictions were found when individuals faced detention, the filing of criminal complaints or disciplinary proceedings against them. Since Luciano has not faced any recourse from the state for exercising his rights to assemble and associate both online or offline. Even though Luciano was not able to create an anonymous social media account, he was still able to use his social media account to publicize events and

⁸⁴ Joint Declaration on Freedom of Peaceful Assembly and of Association and Misuse of Digital Technologies Pg 2

facts⁸⁵. Therefore, it is clear that he is still able to facilitate the exercise of these rights online and

registered mobile number, one is able to obtain the national identity of an individual. Therefore,

not know his identity. Therefore, no restriction has been placed on Luciano's right to participate in Government.

REQUEST FOR RELIEF

For the foregoing reasons, the Respondent State of Varaná respectfully requests this Court to:

1. Adjudge that Varaná has not infringed Petitioner's rights enshrined in Articles 5, 8, 11, 13, 14, 15, 16, 22, 23, and 25 of the ACHR, in conjunction with Articles 1.1 and 2 thereof.

2. Declare that Varaná has fulfilled its obligations under the Convention.

Respectfully,

The Respondent State of Varaná