

*INTERNATIONAL CENTRE FOR SETTLEMENT
OF INVESTMENT DISPUTES*

RIVERSIDE COFFEE, LLC

Claimant

v.

REPUBLIC OF NICARAGUA

Respondent

ICSID CASE NO. ARB/21/16

HEARING ON JURISDICTION AND MERITS

1 July 2024

Volume 1

Washington, DC

ARBITRAL TRIBUNAL

Dr. Veijo Heiskanen, President

Mr. Philippe Couvreur

Ms. Lucy Greenwood

LIST OF PARTICIPANTS*TRIBUNAL:*

Dr. Veijo Heiskanen
vheiskanen@heiskanenlegal.com

Mr. Philippe Couvreur
phcouvreurh@icj-cij.org

Ms. Lucy Greenwood
lucy.greenwood@greenwoodarbitration.com

Secretary of the Tribunal

Ms. Ana Constanza Conover Blancas

COURT REPORTER

Ms. Laurie Carllisle, CSR, CM, CRR

INTERPRETERS

Ms. Silvia Colla

Mr. Charles Roberts

Mr. Daniel Giglio

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LIST OF PARTICIPANTS

ON BEHALF OF CLAIMANT:

APPLETON & ASSOCIATES INTERNATIONAL LAWYERS LP

Professor Barry Appleton

Ms. Lillian De Pena

Mr. Joseph Garvey

REED SMITH LLP

Mr. Edward Mullins

PARTY REPRESENTATIVE

Ms. Melva Jo Winger de Rondón

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LIST OF PARTICIPANTS

ON BEHALF OF RESPONDENT

BAKER HOSTETLER

- Ms. Analia Gonzalez
- Mr. Marco Molina
- Mr. Carlos Ramos-Mrosovsky
- Ms. Nahila Cortes
- Mr. James J. East
- Mr. Fabian Zetina
- Mr. Diego Zuniga
- Ms. Mary Kate Wagner

PARTY REPRESENTATIVE

- Mr. Hernaldo Chamorro

EXPERTS

- Mr. Timothy Hart
- Mr. Kenneth Kratovil

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09:31:54 1 PRESIDENT: Good morning, ladies and
2 gentlemen, colleagues. Welcome to the hearing on
3 jurisdiction and merits in ICSID Case No. ARB/21/16,
4 Riverside Coffee, LLC versus the Republic of Nicaragua.

09:32:18 5 I believe this is the first time we have the pleasure of
6 meeting in person, so let's start with the
7 introductions.

8 First, the Tribunal. My name is
9 Veijo Heiskanen. I have the honor of presiding in this
09:32:36 10 hearing. On my left is Lucy Greenwood and, on my right,
11 Mr. Philippe Couvreur and, on his right, the secretary
12 of the Tribunal, Ms. Ana Conover.

13 May I ask the Claimant to introduce the
14 parties present on your side, please.

09:32:57 15 MR. APPLETON: Thank you very, very much,
16 Mr. President and the Tribunal. Of course, we are
17 delighted that we can finally all be here in person as
18 well. We associate ourselves completely with your
19 sentiments. It's good to be in person and have everyone
09:33:10 20 here.

21 I'm Barry Appleton from the law firm of
22 Appleton and Associates, International Lawyers. I'm
23 joined by my colleague, Lillian De Pena, and also by
24 Joseph Garvey, who is behind me. Joseph, I'm
09:33:23 25 particularly proud of, is a graduate from the New York

09:33:26 1 Law School and will be going to the University of Miami
2 to do an LLM in international arbitration. That was my
3 pitch for our wonderful program in New York and we are
4 very delighted to have him here today.

09:33:39 5 Our legal team is joined by Edward Mullins
6 who's beside me from Reed Smith. He will be joined by
7 his colleague, Alan Bart, later in this hearing. Also,
8 our team is rounded out by William Hill from the Gunster
9 firm, and he will also be joining us a little later in
10 this hearing.

11 Riverside Coffee's client representative,
12 Melva Jo Winger de Rondón is here. Mrs. Rondón owns
13 100 percent of the Riverside membership units and is the
14 company's operating manager. She's acted as Riverside's
09:34:15 15 legal representative to INAGROSA since 2013 and most
16 importantly, I just found out, it is her birthday. A
17 significant one today -- I will not say what -- and she
18 is sharing her birthday with us all.

19 PRESIDENT: Thank you, Mr. Appleton.
09:34:32 20 Happy birthday, Ms. Winger.

21 Respondent, Ms. González.

22 MS. GONZÁLEZ: Good morning,
23 Mr. President, members of the Tribunal, Ms. Conover.
24 It's also a pleasure to be here today. My name is
09:34:50 25 Analia González. I'm counsel for the Republic of

09:34:53 1 Nicaragua. I am a partner at Baker Hostetler and
2 together here with me we have ten members of Baker
3 Hostetler: Marco Molina to my right, Carlos
4 Ramos-Mrosovsky, Rick Dyer, Nahila Cortés, James East,
09:35:15 5 Diego Zuniga, Fabian Zetina, Paul Levine, Mary Kate
6 Wagner, and then we have our damages experts from HKA,
7 Tim Hart and Ken Kratovil.
8 Thank you.
9 PRESIDENT: Thank you very much,
09:35:31 10 Ms. González. Maybe a couple of words about the program
11 over the next two weeks. First of all, we have our
12 tentative hearing schedule for each day of the hearing.
13 The schedule is tentative in the sense that the parties
14 are not bound by the start date -- start time or the end
09:35:56 15 time of the examination of witnesses, but the parties
16 will have to manage your time budget as defined in
17 Procedural Order No.11. You will have the time budget
18 as indicated there, 24 plus 5 hours. 24 hours for the
19 examination of the witnesses, three hours for the
09:36:24 20 opening statements today and two hours for the closing
21 statements on Friday two weeks from today. So that is
22 the time budget that you have to respect as indicated in
23 PO-11.
24 The secretary of the Tribunal will report
09:36:48 25 at the end of each day where you stand and if any issues

09:36:52 1 arise, we trust that they are raised in due course that
2 we are not facing issues with the time budgets towards
3 the end of the hearing.

4 Maybe a couple of other things to remind
09:37:07 5 the parties of. Two of the witnesses, Mr. Ferrufino and
6 Mr. Castro, will be examined remotely on the conditions
7 and in the terms defined in PO-1. So please remind the
8 witnesses of the rules set out for remote examination of
9 witnesses in paragraph 26 of PO-11 to avoid any issues.

09:37:39 10 Also to remind the parties, although that
11 will be unnecessary, this is a public hearing. It will
12 be live-streamed via the internet. So again, for the
13 purposes of dealing with the protected information that
14 we have in the file, I should remind the parties of
09:38:04 15 indicating when you are entering into protected
16 information or any evidence containing protected
17 information so that we can suspend the live stream for
18 the relevant period and also please also remind, once
19 you have dealt with protected information, that we can
09:38:23 20 go back on live.

21 At least a number of exhibits that are
22 considered protected -- considered to contain protected
23 information is relatively limited, but we just wanted to
24 remind the parties so making sure that we manage that
09:38:46 25 and the hearing will proceed smoothly.

09:38:51 1 That's all I think we had on the
2 Tribunal's side, unless my colleagues want to raise any
3 other issues. Is there anything on the parties' side
4 that you would like to raise in terms of housekeeping
09:39:02 5 before we start? Mr. Appleton?
6 MR. APPLETON: We have nothing to add this
7 morning.
8 MS. GONZÁLEZ: No.
9 PRESIDENT: Nothing from either party.
09:39:14 10 So we will then start with the Claimant's
11 opening statement and we haven't fixed the time for the
12 break, so I leave it for you, Mr. Appleton and your
13 colleagues, to decide when you want to have a break, but
14 it should be somewhere halfway through your opening
09:39:38 15 statement, Mr. Appleton. Thank you very much.
16 MR. APPLETON: Before we start, our
17 intention this morning will be to find a spot roughly at
18 the halfway point simply to give you a sense to let
19 everything work, and we'll try to judge it. We may go a
09:40:00 20 few minutes earlier or a few minutes later, depending on
21 where we are in the topics. I have a guess of where
22 that's going to be, but I've guessed wrong every time
23 I've looked at this in the past. But we will do our
24 best. I want everyone to understand, especially for the
09:40:16 25 excellent work that will be done by the interpreters and

09:40:19 1 the court reporters and we recognize it's a public
2 hearing so we want to make sure the public has an
3 expectation as well. And just to confirm, that will be
4 a 15-minute break, correct?

09:40:29 5 PRESIDENT: That is correct. So, please
6 go on, Mr. Appleton.

7 OPENING STATEMENT ON BEHALF OF CLAIMANT

8 MR. APPLETON: Good morning. Today we are
9 able to get together finally in person to be able to
09:40:49 10 address the very grave circumstances surrounding the
11 seizure and the armed occupation of Hacienda Santa Fé.
12 Hacienda Santa Fé is an agricultural estate, it is owned
13 by Inversiones Agropecuarias, which we're going to refer
14 to as INAGROSA, its acronym.

09:41:08 15 For 15 years INAGROSA exported coffee to
16 the United States before transitioning to Hass avocados.
17 This 1224 hectare property -- that's equivalent to about
18 the size of 48,000 tennis courts, just to give us a
19 sense of the large scale and scope of this property.

09:41:31 20 The business of Hacienda Santa Fé reflected INAGROSA'S
21 deep commitment to social responsibility, environmental
22 stewardship and economic diversification. But INAGROSA
23 was not involved in politics in Nicaragua in any way.
24 It was just involved in business.

09:41:51 25 Carlos Rondón, the chief operating

09:41:53 1 officer, who you will hear from during this hearing, was
2 a longstanding advocate for economic diversification to
3 reduce reliance on coffee production for this part of
4 Nicaragua, and INAGROSA was deeply committed to
09:42:07 5 environmental stewardship. That was an essential part
6 of its corporate DNA.

7 The property itself was acquired through a
8 court order in 1997. INAGROSA was held with what we
9 call undisputed title, a court-ordered sale, so it is
09:42:25 10 established by the court, and it was undisputed for over
11 two decades. As a controlled foreign subsidiary of
12 Riverside Coffee, a Kansas-based company managed by
13 Melvin Winger at that time, an esteemed business leader
14 in southwestern Kansas. Riverside Coffee was run by the
09:42:47 15 Winger family and their close friends.

16 Melvin Winger was the managing operator.
17 That is the title of the CEO of this type of limited
18 liability company, managing operator. Melvin was a
19 highly successful American business and community leader
09:43:00 20 in southwestern Kansas. Mr. Winger was the chairman of
21 the board of the local bank. He ran numerous successful
22 agricultural companies for commodity products such as
23 wheat and corn and sorghum. He had a farming implements
24 company. He was the chair of the local electrical
09:43:18 25 commission. He served on the board of a local

09:43:21 1 university. He was an elected official being elected
2 the chair of Stanton County Kansas for over 40 years. A
3 man of unbesmirched reputation. He was a man who knew
4 how to run a successful business, including agricultural
09:43:38 5 businesses.

6 Between 2003 and 2020, Melvin Winger was
7 the president of INAGROSA in addition to his role at
8 Riverside. So Melvin Winger had two roles: one as the
9 managing operator of Riverside, the other as the
09:43:55 10 president of the controlled foreign subsidiary,
11 INAGROSA.

12 I will just give you a sense of today's
13 plan. First, we are going to examine the critical
14 events between June 16 and 18, 2018, the first
09:44:10 15 three days. Then we're going to review key exhibits and
16 explore the broader context of the Nicaraguan government
17 actions. Then we're going to discuss CAFTA treaty
18 obligations and outline how Nicaragua's actions and
19 omissions have devastated INAGROSA'S operations and
09:44:32 20 Riverside's investment. So that's our plan and we'll
21 take our break somewhere in the midpoint along that way.
22 I expect we'll be discussing the law by that point.

23 The seizure and occupation of Hacienda
24 Santa Fé is the central issue. I think we should start
09:44:48 25 there.

09:44:49 1 Now, in June 2018, armed thugs claiming
2 express government authorization seized Hacienda
3 Santa Fé, halting operations and issuing death threats.
4 During the occupation, the invaders destroyed the
09:45:09 5 carefully cultivated and valuable Hass avocado
6 plantations eventually replacing them with destructive
7 substantive crops such as beans. Nurseries were ruined,
8 and years of investment in cultivating a long-cycle
9 fruit plantation was lost. The invaders looted the
09:45:28 10 estate, they destroyed valuable avocado plantations and
11 harvested rare hardwood trees, some of which were
12 growing for more than a century. This invasion rendered
13 it impossible for INAGROSA to continue its operations,
14 devastating Riverside's investment.

09:45:45 15 But it didn't have to end this way. A
16 basic level of police protection by the Nicaraguan
17 authorities would have evicted the armed thugs, reduced
18 the risk of violence and deterred further invasions.
19 Nicaragua failed to provide this basic level of police
09:46:05 20 protection, even though it had done so in other
21 incidents at the same time.

22 Despite INAGROSA'S immediate reports to
23 the police, the Nicaraguan authorities failed to provide
24 necessary protection. And this pattern of inaction
09:46:21 25 persisted, culminating in a belated response three years

09:46:25 1 later, and that happened only after Riverside initiated
2 this arbitration. The police activity -- sorry, the
3 police inactivity, to be precise, signaled tacit
4 approval of the invaders' actions.

09:46:42 5 Now, had Nicaragua acted pursuant to its
6 legal mandate under its own police law -- you can see
7 that's Law 872 -- it's Exhibit C-0007 -- and under its
8 Law 872, its obligation is to protect the public in
9 general. It's a general obligation and we'll turn to
09:47:03 10 that as we go along. But INAGROSA could have continued
11 its operations to sell Hass avocados into profitable
12 export markets in North America, starting with Canada
13 and moving to the United States.

14 But Nicaragua's profound failure to
09:47:18 15 protect the victims of the unlawful behavior and its own
16 role in the invasion itself and its aftermath are at the
17 heart of this dispute.

18 The invasion and the failure to act,
19 coupled with the further abusive conduct in this
09:47:35 20 arbitration including de jure actions and other measures
21 seemingly aimed at a regulatory taking, engages
22 Nicaragua's international responsibility under the CAFTA
23 and under several CAFTA obligations.

24 And we know that Riverside and INAGROSA
09:47:52 25 acted reasonably and diligently to avoid aggravating the

09:47:56 1 situation. They reported the invasion to the Nicaraguan
2 authorities and were available to cooperate in its
3 resolution.

4 Now, these invaders, promised Hacienda
09:48:08 5 Santa Fé lands by the Sandinista government, resisted
6 leaving. The belated action raises serious questions
7 about Nicaragua's true motives. It suggests a
8 strategic, albeit futile, move to evade liability rather
9 than a genuine commitment to protecting treaty rights.

09:48:30 10 But Nicaragua's pretense cannot obscure
11 the profound and damaging effects of its measures.
12 Incredibly, Nicaragua asserts that its response was
13 diligent and acceptable. The overwhelming evidence
14 contradicts this absurd statement. The occupation
09:48:47 15 occurred in 2018, yet the government did not evict the
16 unlawful occupiers for three years, and again, only when
17 faced with the prospect of scrutiny from an
18 international arbitration tribunal, public attention of
19 its wrongfulness, including attention that we have in
09:49:08 20 this open hearing today, and the risk of payment of
21 significant damages.

22 Expert evidence from legal expert
23 Renaldy Gutiérrez demonstrates that Nicaragua's reaction
24 neither was fair, nor evenhanded in protecting the
09:49:22 25 victims' interests. Instead, it was singularly focused

09:49:26 1 on maximizing Nicaragua's financial liability. These
2 actions of the State of Nicaragua violated international
3 law requirements, including fair and equitable treatment
4 and they constituted an expropriation.

09:49:42 5 In 2018, Nicaragua engaged in activities
6 condemned by the United Nations and the Organization of
7 American States Experts as antithetical to the rule of
8 law. Expert evidence that is before the Tribunal
9 confirms systemic, state-directed violence against
09:50:04 10 civilian opposition to the Daniel Ortega-led Sandinista
11 government.

12 Riverside provided compelling evidence in
13 this arbitration in the form of detailed expert reports
14 from Tulane University Professor Justin Wolfe. They are
09:50:20 15 CES-02 and CES-05. Government officials, including
16 Congressman Edwin Castro -- these are Nicaraguan
17 government officials -- directly supported the
18 occupation, instructing the invaders to remain in place
19 while the government sought to purchase the land. Of
09:50:38 20 course no purchase ever took place.

21 Professor Wolfe confirms that the
22 state-sponsored nature of the invasion relying on --

23 SPANISH COURT REPORTER: Excuse me.
24 Sorry.

09:50:58 25 (Technical interruption)

09:50:59 1 MR. APPLETON: I'll just return to where I
2 was.

3 Professor Wolfe confirms that the
4 state-sponsored nature of the invasion itself -- and he
09:51:09 5 does so by relying on extensive investigations of
6 independent experts from the United Nations Human Rights
7 Committee, the Organization of American States, NGOs, a
8 free press and foreign governments observing the
9 situation in Nicaragua.

09:51:29 10 I'm going to ask that you activate the
11 PowerPoint presentation now, and we can see, if we get
12 this to work, that, if we go now to slide 2 after the
13 very nice pictures of an avocado -- we are having a
14 little technical problem.

09:51:59 15 You can see here on slide 2 that -- we're
16 going to summarize what did Professor Wolfe rely on.
17 And as I stated, the UN Human Rights Committee, the
18 Organization of American States, various NGOs, reports
19 from foreign governments observing the situation,
09:52:17 20 reports from independent media and its own extensive
21 expertise specializing in a scholarship on this area.

22 Now, this evidence from Professor Wolfe is
23 quite pivotal to understand and evaluate what's going on
24 here. You can't evaluate this without understanding
09:52:34 25 what's going on outside.

09:52:38 1 So peaceful protests in Nicaragua were met
2 with deadly state-ordered force from the police.
3 Independent media were silenced, faith leaders
4 imprisoned, the thousands detained without charge for
09:52:52 5 the reason of dissenting from the Sandinista program.

6 Nicaragua was not governed by the rule of
7 law but by brute force where repression and violence
8 silenced those who peacefully spoke truth to power. The
9 independent evidence confirms Nicaragua's failure to
09:53:11 10 comply with basic foundational international law
11 standards and this evidence reveals that
12 Nicaragua employed its police --

13 MS. CONOVER: Mr. Appleton, I'm sorry to
14 interrupt. We lost the Spanish channel. Give us one
09:53:22 15 second.

16 MR. APPLETON: And you're stopping the
17 clock, I assume.

18 MS. CONOVER: It seems like there is an
19 issue coming from the Zoom connection of the
09:53:42 20 interpreter.

21 MR. APPLETON: Can we just stop for a
22 moment?

23 MS. CONOVER: Yes, could we make a very
24 brief pause for the technicians?

09:53:50 25 MR. APPLETON: I want to ensure that the

09:53:52 1 public in Nicaragua is able to understand what's going
2 on at this particular time.

3 PRESIDENT: Let's break until this issue
4 is sorted out and of course the clock is suspended.

09:54:00 5 (Pause)

6 PRESIDENT: We are good to go.

7 MR. APPLETON: Excellent. Okay. I'm just
8 going to figure out exactly where I left things. I'm
9 going to go back. I'm not sure. Where did the Spanish
09:56:00 10 translation end, do we know? There are certain things I
11 want to make sure the people of Nicaragua are able to
12 hear.

13 MS. CONOVER: You may continue from where
14 you were last speaking in English.

09:56:28 15 MR. APPLETON: The statement talking about
16 there was silence of those peacefully speaking truth to
17 power?

18 MS. CONOVER: We have as your last
19 sentence that was recorded on the English transcript:

09:56:34 20 "The independent evidence confirms
21 Nicaragua's failure to comply with basic international
22 law standards."

23 MR. APPLETON: Did we have a loss before
24 then in Spanish? No? I'm just going to repeat it from
09:56:47 25 the line before to ensure that everyone understands. We

09:56:53 1 can resume the clock and go from there.

2 Just to make sure that we're very clear
3 now that we're connected again, that Nicaragua was not
4 governed by the rule of law but by brute force where
09:57:06 5 repression and violence silenced those who peacefully
6 spoke truth to power.

7 These are profound statements. These are
8 not the average things that are going on. The
9 independent evidence confirms Nicaragua's failure to
09:57:20 10 comply with basic international law standards. The
11 evidence reveals that Nicaragua employed its police,
12 military and other state apparatus to oppress its
13 perceived opponents leading to the UN independent
14 experts concluding that Nicaragua had committed crimes
09:57:37 15 against humanity. This is a major finding. This is not
16 a minor transgression.

17 And in such climate, the treaty rights of
18 foreign investors, a cornerstone of international law,
19 were disregarded callously, and treaty rights were
09:57:51 20 replaced by pretense and falsehood. These are precisely
21 the situations where the protections of international
22 investment treaties are the most crucial. Yet, this is
23 when Nicaragua shamefully seeks to shirk its
24 international responsibilities owed to this American
09:58:08 25 investor.

09:58:09 1 We find that very troubling. But the
2 evidence reveals a calculated strategy by the Nicaraguan
3 government to dispossess INAGROSA and undermine
4 Riverside's investment. This Tribunal must uphold the
09:58:22 5 rule of law and ensure that the CAFTA protections remain
6 robust in this circumstance and other circumstances that
7 be in this region. Riverside seeks fair treatment and
8 justice for the egregious violations it has endured and
9 we trust this Tribunal will see through Nicaragua's
09:58:37 10 defenses and reinforce the paramount importance of
11 international law. At its heart, that's what this case
12 really is about.

13 Now, we initially want to focus on three
14 pivotal events that transpired over three crucial days,
09:58:56 15 from June 16 to 18, 2018. On June 16, 2018, armed
16 individuals forcibly entered Hacienda Santa Fé asserting
17 they were acting under the direction of the Sandinista
18 government. These invaders claimed to represent the
19 government of Nicaragua. They claimed to represent what
09:59:14 20 they call the Government of National Unity and
21 Reconciliation and declared the Hacienda Santa Fé now
22 belonged to them. They confronted INAGROSA'S security
23 team demanding a surrender, and they cited government
24 orders to take possession of the property and asserted
09:59:30 25 that they were not stealing anything.

09:59:34 1 Now, in 2018, it was well known that
2 Hacienda Santa Fé was privately owned. As we mentioned,
3 for over two decades INAGROSA had title and INAGROSA had
4 been conducting agricultural operations at Hacienda
09:59:47 5 Santa Fé. Yet, the occupiers justified their actions by
6 claiming the government directed them and granted them
7 the lands of Hacienda Santa Fé.

8 Upon the invasion, INAGROSA immediately
9 sought assistance from the National Police.
10:00:07 10 Luis Gutiérrez, Hacienda Santa Fé's administrator,
11 contacted the local police, specifically Police Captain
12 William Herrera, seeking urgent intervention.

13 Captain Herrera acknowledged that he was
14 already aware of the invasion and advised INAGROSA to
10:00:25 15 evacuate the lands due to a purported fire risk.
16 Despite the emergency report from the victims,
17 absolutely no police or fire assistance was provided on
18 June 16. Hacienda Santa Fé and its workers were left
19 unprotected and vulnerable against armed thugs.

10:00:43 20 On June 17th, the next day, police
21 officers led by Inspector Calixto Vargas, finally
22 arrived at Hacienda Santa Fé, and as you can see on the
23 map here, slide 3 of Hacienda Santa Fé, the invasion
24 area is in the El Pavón sector in the north, in the
10:01:03 25 extreme northern part of the El Pavón sector. You can

10:01:06 1 see where the arrow points -- this is a map that comes
2 from the Republic of Nicaragua -- they point out where
3 Hacienda Santa Fé is on the road, right at the bottom of
4 that. The El Pavón sector is really on one side of the
10:01:19 5 road, the sector Santa Fé is on the other side of the
6 road, so this map is not really accurate, but it's close
7 enough.

8 And so the invaders initially come into
9 the northern area. This is the area where INAGROSA had
10:01:35 10 cultivated coffee. The business office, the Hass
11 avocado trees, the cultivation operations were all in
12 the southern zone. They were far away from where the
13 incident was taking place. This is a little bit akin to
14 the police addressing an incident over at the White
10:01:52 15 House by going to Dulles Airport. It just makes no
16 sense if it's meant to be a diligent response to an
17 invasion by armed thugs. You're not responding to
18 something at the White House if you're miles away. It
19 just doesn't make any sense whatsoever.

10:02:09 20 Inspector Vargas and his team thus did not
21 investigate the actual crime scene. And by confining
22 their presence to a non-crime scene, they failed to
23 assess the full extent of the illegal occupation of the
24 crime scene. They neglected their duty to protect
10:02:24 25 INAGROSA'S property. The inactivity signaled to the

10:02:27 1 illegal occupiers that they could act as they wished.
2 Of course they're there under government direction so
3 they assume that anyways, but there's no record or
4 testimony from Inspector Vargas or any of his team
10:02:40 5 regarding their visit highlighting a lack of documented
6 police action or investigation in this case. Nothing.
7 Now, on the third day, June 18th, INAGROSA
8 decided to obtain information directly about what the
9 invaders sought. Certainly INAGROSA had received no
10:02:58 10 information from the police about the situation over the
11 last two days since reporting the seizure.
12 So INAGROSA'S senior administrator,
13 Luis Gutiérrez, a witness in this arbitration, met with
14 the armed thug leaders. And Mr. Gutiérrez received
10:03:17 15 direct confirmation from the armed thug leaders that
16 they were acting on government instructions, that they
17 had seized Hacienda Santa Fé as part of a
18 government-directed land redistribution initiative.
19 As Riverside's evidence demonstrates, the
10:03:32 20 assertions regarding the government's direction of land
21 invasions are highly credible. The expert evidence
22 confirms that in November of 2018 -- that, in Nicaragua
23 in 2018, the Sandinista government orchestrated
24 state-sponsored land invasions. These acts were done
10:03:53 25 with the support and with the direction of the police.

10:03:57 1 Both support on some, direction on others. It's one
2 autocratic system.

3 Professor Wolfe's unrebutted expert
4 evidence -- there's no rebuttal to his expert evidence
10:04:10 5 here -- outlines the government's active role in these
6 unlawful activities, highlighting the systemic nature of
7 these state-sponsored invasions, and Nicaragua chose not
8 to tender expert evidence to rebut Professor Wolfe's
9 testimony. Of course, how could it in the face of all
10:04:29 10 the independent investigations from the United Nations,
11 from the OAS, from all of the NGOs, from all the foreign
12 governments and as sanctions that have been placed on
13 them for these types of activities. And this compelling
14 evidence underscores the gravity of the situation and
10:04:44 15 the need for this Tribunal to acknowledge the extent of
16 the government involvement.

17 By recognizing these practices, the
18 Tribunal can better understand the context in which
19 Riverside's claims arise and the significant challenges
10:04:57 20 faced by those who oppose such state-sponsored actions.

21 Now, let's talk a little bit about the
22 inspection of Inspector Vargas. As noted on June 17th,
23 Inspector Vargas only went to the southern portion of
24 Hacienda Santa Fé. Inspector Vargas did not evaluate
10:05:19 25 the scene of the invasion, investigate the identity or

10:05:21 1 the motives of the occupiers, assess the scale of the
2 occupiers' operations or their armaments, provide any
3 written reports or testimonies about the invasion,
4 assess whether any other criminal acts were involved in
10:05:36 5 this trespass or investigate any demands made by the
6 invaders.

7 Inspector Vargas already knew what
8 happened. Just like Captain Herrera admitted he already
9 knew the day before in his previous telephone call with
10:05:55 10 Luis Gutiérrez. There was no media reporting about
11 this. No social media posts in June 16 or 17. This
12 begs the obvious question: how did the police know about
13 a land invasion in rural Nicaragua even before the call
14 from the victims reporting the crime occurred?

10:06:13 15 This is also inconsistent with regular
16 state practice for land invasions. We see here in
17 slide 4, paragraph 121 of Professor Wolfe's second
18 report, and here he says that "those who were considered
19 not supporters of the Nicaragua regime were uniformly
10:06:33 20 met with arrest, detention without charge and
21 confiscation of their goods". He says that negotiation
22 with the invaders was not a typical pattern for the
23 government in 2018. Many were subjected to physical
24 violence. "This is the pattern to expect from those
10:06:52 25 opposed to the Sandinista regime."

10:06:55 1 So if these were people who were opposed
2 to the regime, you would have seen a type of outcome
3 very different from what we actually saw here.

4 Now, what did Inspector Vargas focus on?
10:07:06 5 He focused entirely on the victim's defensive
6 capability. He demanded the confiscation of INAGROSA'S
7 defensive weapons and encouraged the security staff to
8 flee, citing a fire risk without any further
9 explanation.

10:07:22 10 And in fact Inspector Vargas didn't
11 mention any reason for the delay in responding to the
12 emergency call, or comment on any supposed orders that
13 the police remain in their barracks. Inspector Vargas
14 didn't identify circumstances impairing police
10:07:35 15 performance such as barricades or unrest.

16 His conduct, coupled with prior knowledge
17 of police officials, suggests state complicity in the
18 land seizure. And to be clear, Nicaragua's "defense"
19 that it ordered the police to remain in its barracks is
10:07:52 20 only an admission of Nicaragua's complete abdication of
21 its duty to protect foreign investments.

22 Now, again, the police did nothing on
23 June 16th. All they did was tell INAGROSA to abandon
24 its lands.

10:08:12 25 On June 17th, Inspector Vargas did nothing

10:08:16 1 to protect INAGROSA from the criminals. The police did
2 one thing and one thing only: he surveyed the defensive
3 capabilities of INAGROSA'S security team and demanded
4 they turn over their weapons.

10:08:28 5 There are no written reports from
6 Inspector Vargas, there are no written reports of those
7 who joined him at Hacienda Santa Fé and although these
8 police officers were all available to testify in
9 Nicaragua, none have been presented to offer evidence.

10:08:43 10 INAGROSA was a victim of an unlawful land
11 invasion and the police showed at least a manifest
12 disinterest in protecting the victims and took no steps
13 to assess the threats from the armed thugs. They
14 offered no plan to assist Hacienda Santa Fé. Inspector
10:08:57 15 Vargas said and did nothing for the victims.

16 So the police inaction and the
17 government's apparent foreknowledge indicates that the
18 invasion was a state-sanctioned act. And we'll consider
19 the broader context shortly about why the government may
10:09:13 20 have failed to protect private property and uphold the
21 rule of law, but it's clear that they didn't defend the
22 private property and the lives of the workers. Any
23 reasonable observer would conclude the police were
24 unwilling to defend the private property and its
10:09:27 25 workers. The police took no steps to contain the

10:09:31 1 occupiers' actions or prevent further harm from
2 occurring to INAGROSA. None of these.

3 They came, they showed up, and basically
4 said have a nice day and left. Nothing.

10:09:44 5 Now, Nicaragua retroactively tries to
6 justify its inactions with claims of emergency and
7 security concerns and to rely on such justifications,
8 Nicaragua must prove that the police acted based on
9 those considerations at the relevant time. When the
10:10:00 10 police visited the southern zone of Hacienda Santa Fé in
11 June 2018, they merely observed the situation,
12 confiscated the firearms and then left. There's no
13 evidence the actions were guided by emergency or
14 security concerns. And Nicaragua's conduct is
10:10:19 15 incompatible with genuine emergency responses. In such
16 situations, driven by emergency and security concerns,
17 public authorities are expected to disclose the
18 existence of a specific emergency and the need for
19 extraordinary measures.

10:10:33 20 Nicaragua must demonstrate that its
21 actions, at that time, were determined by these
22 considerations, supported by documentation explaining
23 the government's decision-making process.

24 Now, a review of Nicaragua's press
10:10:47 25 releases -- which they say this is going to be

10:10:50 1 supported -- confirms the lack of announcements of
2 emergency and extraordinary measures in the vicinity of
3 Hacienda Santa Fé in the summer of 2018. The police
4 press releases show sporadic criminal issues but no
10:11:02 5 claims of overwhelming civil disturbance constraining
6 overall state protective capabilities is expressed in
7 these press releases.

8 And when the police visited INAGROSA in
9 June 2018, they did not investigate the crime scene.
10:11:17 10 They looked around the business and said goodbye. And
11 this inaction violates any reasonable standard of full
12 protection and security.

13 The police came on July the 4th. They
14 went with Domingo Ferrufino, another witness in this
10:11:36 15 arbitration who we'll hear from tomorrow. They went at
16 that point to the invasion zone. At this time the
17 police did not tell the invaders to leave. They didn't
18 issue any criminal charges. They didn't conduct
19 surveillance. They said nothing to the victim
10:11:50 20 whatsoever, INAGROSA. The police walked around and
21 left. The police made no investigation notes as
22 Nicaragua produced no notes, no pictures, no emails.
23 This is not police work or protection. This is the
24 opposite of protection.

10:12:07 25 Slide 5 sets out article 2 of Law 872, the

10:12:14 1 National Police Law. It says that the National Police
2 "has the mission throughout the national territory to
3 protect the life, integrity and security of people and
4 their property." This is an obligation of general
10:12:25 5 availability to all those in Nicaragua.

6 And article 1, which I didn't display
7 here, but article 1 of that same law says that the
8 Nicaraguan police force is a national body, that it is
9 indivisible and responsible for all police activities.
10:12:41 10 So it is national, connected all through, and its focus
11 is to deal with the security of people and their
12 property.

13 Now, Nicaragua must provide a baseline of
14 police protection as established by its police law, and
10:12:54 15 this is an international law expectation. Even in
16 challenging circumstances involving a terrorist or
17 separatist, you would still have that basic level of
18 expectation, and yet the Nicaraguan government only
19 acted three years later after Riverside brought this
10:13:11 20 claim in 2021. And during three years of inaction,
21 Riverside's business was destroyed.

22 And even if a legal dispute existed over
23 the title of Hacienda Santa Fé, which it didn't,
24 Nicaragua's obligation under the full protection and
10:13:24 25 security still demands the protection of the investor's

10:13:28 1 property, its personnel and its investment.

2 Yet, the police provided no protection
3 whatsoever. The blatant neglect falls woefully short of
4 meeting Nicaragua's treaty obligations.

10:13:42 5 In the event of a legitimate property
6 dispute, the police are expected to intervene and
7 instruct unlawful armed perpetrators to cease and
8 desist. They should firmly state "you're trespassing
9 into private property, you must leave immediately."

10:13:55 10 This didn't happen here. The police should advise the
11 aggrieved parties that they may need to resolve their
12 dispute through the courts. But brute force can't be
13 allowed to prevail. But that also didn't happen here.
14 Armed thugs invaded INAGROSA'S property, brandishing
10:14:14 15 guns and issuing death threats to INAGROSA'S leadership
16 and beating non-compliant employees.

17 And under CAFTA, whether it involves full
18 protection and security or fair and equitable treatment,
19 the police are required to respond to the scene of the
10:14:29 20 infraction, attempt to halt such unlawful behavior. The
21 police could have addressed the armed thugs to desist.
22 They could have advised them to desist, they could have
23 advised them to seek legal resolution through the
24 courts, but that didn't happen here. As we see here in
10:14:46 25 slide 6, to make it easier to understand what our

10:14:49 1 position is, we articulate the following:

2 There was collusion and conspiracy between
3 the invaders and the state authorities. That's A.

4 B. The failure to provide police
10:15:06 5 protection and other related protective services,
6 through actions and omissions, reflects the government's
7 determination that the invasion and seizure served
8 Nicaragua's governmental purposes.

9 And C, that a host state's failure to act
10:15:24 10 diligently to provide police protection for physical
11 security of the investment gives rise to state
12 responsibility under full protection and security.

13 Now, in contrast, discrimination norms and
14 the level of protection provided between Riverside's
10:15:40 15 investment and domestic investors and the investments of
16 investors of other states, that violates national
17 treatment and MFN treatment. That's a different type of
18 focus than what we're looking at here which is much more
19 in the full protection approach and perhaps with fair
10:15:55 20 and equitable treatment.

21 But here, across the board, for INAGROSA
22 the authorities did nothing at all to intervene to evict
23 and deter the invaders in June and July 2018. The
24 evidence demonstrates that the conduct of the
10:16:10 25 authorities fell well below the standard for full

10:16:12 1 protection and security, whether articulated through
2 diligence or reasonableness or the obligation to take
3 reasonably available measures. Every single one of them
4 they can't meet.

10:16:22 5 And even if the Tribunal concludes that
6 the evidence for approaches A and B about the
7 government's direct role is inconclusive after hearing
8 the evidence, Nicaragua has very substantial liability
9 under the full protection and security obligation in
10:16:36 10 approach C, which focuses on the direct acts and
11 omissions of state protective authorities.

12 The situation here is exacerbated by a
13 subsequent pattern of abuse against the investor through
14 regulatory and legal processes, which illustrates the
10:16:52 15 Sandinista regime's autocratic approach. As Riverside
16 has shown, after this claim was presented, Nicaragua
17 sought to oust the investor by transferring the
18 exclusive property title to the state after initially
19 attempting to give it to its allies, these invaders.

10:17:12 20 This was facilitated by Nicaragua's
21 failure to provide standard police protection but the de
22 jure transfer of title, taking INAGROSA'S exclusive
23 title and making it non-exclusive constitutes an
24 expropriation in itself. And the police inaction
10:17:33 25 continued, despite knowing the thugs were destroying and

10:17:36 1 devaluing the property, destroying investments and
2 rendering the property unusable for commercial
3 operations.

4 Finally, in this case Nicaragua conducted
10:17:48 5 a regulatory witch hunt against the company, applying
6 every conceivable rule to hinder INAGROSA'S operations.
7 This in itself is an abuse of process and a violation of
8 even handedness, breaching principles of fair and
9 equitable treatment, another CAFTA treaty violation.

10:18:08 10 This witch hunt included abuse of process
11 where Nicaraguan regulators attempted to claim that
12 INAGROSA was unable to use its land due to its
13 designation as a private wildlife reserve when the
14 express terms of the government resolution required for
10:18:27 15 a private wildlife reserve never were met and the
16 reserve could never have been legally effective. Yet
17 the regulators ignored the facts and unilaterally
18 subjected the operations of INAGROSA to applicable
19 regulations all without notice and all without the
10:18:42 20 benefit of due process.

21 In addition, Nicaraguan government
22 officials were aware of the imminent harm to INAGROSA
23 but failed to warn it or take advance steps to protect
24 it. That in itself is yet another violation of fair and
10:18:55 25 equitable treatment. This failure constitutes a breach

10:18:59 1 both under CAFTA article 10.5 of fair and equitable
2 treatment and full protection and security.

3 So Nicaragua's failure to act at the time
4 and subsequent attempts to justify this failure are
10:19:09 5 indefensible, and the Tribunal has to recognize that
6 Riverside has suffered severe economic loss and
7 irreparable harm due to Nicaragua's neglect and to hold
8 Nicaragua accountable for these violations of
9 Riverside's rights.

10:19:25 10 Now, a second invasion then occurs because
11 of the lack of anything in the first. So not surprising
12 because the police -- remember the map -- they don't do
13 anything, they don't blockade anything, they don't tell
14 these people don't do anything more. So, not

10:19:40 15 surprisingly, a month later on July 16, 2018, there's a
16 second invasion exactly one month later. During the
17 second invasion the armed thugs expanded their control
18 to encompass the entire property. They seized the
19 avocado cultivation areas, processing facilities,
10:19:58 20 nurseries, corporate office, operational equipment,
21 vehicles.

22 On that same day, July 16th, chief
23 agronomist, Luis Gutiérrez, encounters Favio Enriquez,
24 the local agricultural delegate for Jinotega.
10:20:16 25 Mr. Enriquez, another witness in this arbitration, who

10:20:20 1 surprisingly tries to distance himself now from his
2 admissions earlier, confirmed to Mr. Gutiérrez that the
3 Nicaraguan government was orchestrating the occupation
4 of Hacienda Santa Fé. He disclosed that the land
10:20:32 5 seizure was intended to exert pressure on the business
6 sector. This unexpected confirmation from a government
7 official on the same day as the expansion invasion
8 underscores the premeditated and widespread nature of
9 this invasion.

10:20:48 10 The invasion and occupation were not
11 spontaneous, nor isolated incidents, but rather
12 meticulously planned and orchestrated actions.

13 And Mr. Enriquez inadvertently confirmed
14 that the occupation of Hacienda Santa Fé's was part of a
10:21:05 15 systemic government strategy. His admission revealed
16 the government's involvement and intent.

17 And further evidence of this premeditation
18 is found in the emergency phone call Luis Gutiérrez made
19 to Captain Herrera. If you recall, Captain Herrera said
10:21:20 20 he already knew about the invasion at the time. Captain
21 Herrera's prior knowledge is another indication of the
22 premeditated nature of the government's actions.
23 Additionally, Inspector Vargas' lack of investigation of
24 the crime scene the previous month is yet another
10:21:35 25 indicator of the governmental orchestration. He didn't

10:21:38 1 have to look. He knew what was going on. He didn't
2 have to tell them anything because they knew.

3 The saying goes "Where there's smoke,
4 there's fire." And the smoke reveals a fire that was
10:21:50 5 ignited by the government. It was not a spontaneous act
6 by state opponents but a calculated strategy by the
7 government itself and the evidence, including
8 Mr. Enriquez's statement, confirms the deliberate and
9 premeditated nature of the invasion.

10:22:07 10 We can just look at the social media posts
11 that's additional evidence at that same time. This is
12 from a group called the Civic Alliance, Exhibit C-035,
13 you'll see it here on slide 7. First we have what looks
14 like Spanish. I'll pop an English translation up.

10:22:21 15 And you can see that what we see here is
16 that the social media group identifies that the invasion
17 was ordered by Mayor Centeno and that it also says that
18 the government's paramilitary supporters were based in
19 Hacienda Santa Fé and that failure to cooperate with

10:22:46 20 Sandinista orders would mean that your stolen lands that
21 were allocated to you would be revoked. Because they
22 were using this in part of what's talked about in
23 Professor Wolfe's statements, Operation Cleanup, an
24 operation where they would use paramilitary supporters
10:23:00 25 to be able to cause violence against the peaceful

10:23:05 1 protesters to try to shut it down and that they would
2 then reward them with lands and other issues like this.
3 That is described in the first report of Professor Wolfe
4 and it's described again in its specific context here in
10:23:18 5 his second.

6 So what we see is the planned and systemic
7 nature of the occupation, how did it fit within the
8 government's strategy. And once more we now have some
9 contemporaneous extrinsic evidence revealing that the
10:23:34 10 invasion and the seizure of Hacienda Santa Fé were
11 government sanctioned and that the idea was to support
12 those using illegal force to repress peaceful political
13 expression and that Riverside was targeted because it
14 was a foreign business and its valuable lands could be
10:23:51 15 exploited to garner support for the dictator's unpopular
16 regime.

17 Now, in conclusion, this evidence clearly
18 demonstrates that the Nicaraguan government orchestrated
19 and sanctioned the invasions, revealing a deliberate
10:24:04 20 strategy to undermine and to seize control of INAGROSA'S
21 operations.

22 But that's not all. We have another
23 document -- we don't have these invaders -- the
24 occupiers aren't here. They're not before us to give us
10:24:19 25 evidence, but there is a letter from them that speaks

10:24:22 1 for them. And we can turn to that. And that was
2 provided by our friends from the Republic of Nicaragua,
3 R-0065. That's here on slide 9.

4 This is a letter from September 5, 2018.
10:24:39 5 The letter is sent to the Attorney General of Nicaragua
6 from the invaders, and if we go to slide 10, just to
7 flip over the page, you'll see the people who signed it
8 are Comandante Gorgojo (Benicio de Jesus González) and
9 Comandante Cinco Estrellas (Efren Humberto Orozco).

10:25:03 10 And they issued a written statement.
11 Comandante Gorgojo is no longer alive but Comandante
12 Cinco Estrellas is still available. Nicaragua didn't
13 produce him. Set out here on slide 11 is a list of key
14 occupiers, of others who were available. They
10:25:18 15 include -- I'm going to give you their nom de guerre as
16 well as their actual name:

17 Avispa (Ciro Montenegro), El Pistolero
18 (Cristobal Luque), El Chino (Ney Arial Ortega Kuan) and
19 Wama (Wendel Adrián Mairena).

10:25:41 20 They are alive and available. However,
21 Nicaragua has presented none of the occupiers as
22 witnesses in this arbitration.

23 Professor Wolfe in paragraph 116 of his
24 second expert report, notes Nicaragua's police confirmed
10:25:54 25 at least three Sandinista members in the leadership of

10:25:58 1 the invasion which they downplay here. These include
2 Luis Antonio Rizo, known as the notorious Comandante
3 Toño Loco, Ney Ariel Ortega Kuan, who I just mentioned,
4 El Chino, and Haniel Rizo, Toño Loco's son, who becomes
10:26:16 5 a very important leader after Toño Loco's death.
6 So these other two Sandinista leaders were
7 available as well. Where are they? And it's as if
8 Nicaragua wants to suppress this evidence from the
9 Tribunal so the Tribunal wouldn't see. None of these
10:26:32 10 witnesses can tell you any of these things. Not one.
11 Riverside, by comparison, has offered
12 eyewitness testimony, but this letter from some of the
13 actual perpetrators of the crime is highly probative.
14 The third slide from this, slide 12, looks
10:26:52 15 at the key admissions here. Let me just look at what's
16 in the letter. It says that "we are currently members
17 of the Alianza Unidad Nicaragua Triunfa, which is
18 presided over and led by the Sandinista National
19 Liberation Front (SNLF) ..." The Alianza is something
10:27:17 20 we're going to talk about in a minute. "... and we can
21 say that we are directly under the leadership of our
22 comrade, the President of the Republic, Commander Daniel
23 Ortega and our comrade and vice president Rosario
24 Murillo."
10:27:36 25 This letter highlights their affiliations

10:27:40 1 with the Alianza led by the Sandinista National
2 Liberation Front under the leadership of the president
3 of the country, Ortega, and his vice president, Murillo.
4 Nicaraguan history expert, Professor Justin Wolfe
10:27:56 5 confirms in his second expert report that the letter
6 shows these occupiers were affiliated with the
7 government rather than opponents as they had suggested
8 shamelessly in their materials and in their witness
9 statements too.

10:28:04 10 Professor Wolfe confirms that since 2006
11 the Nicaraguan resistance has been allied with the
12 Sandinista party, he says that expressly in paragraph
13 114 of the second export report, and this writing is
14 from the occupiers themselves, the persons perpetrating
10:28:18 15 the crime and the occupiers celebrated the alliance
16 between the former Nicaraguan resistance and the current
17 Sandinista government and declared their control by the
18 government.

10:28:32 19 In the counter-memorial, Nicaragua spent a
20 great deal of time framing a counter-narrative that the
21 occupation of Hacienda Santa Fé was conducted by violent
22 and dangerous enemies of the state. Professor Wolfe
23 summarizes a number of these misleading statements that
24 the Nicaraguan resistance in 2018 had an anti-government
10:28:50 25 stance. You can see that in paragraph 34 of his second

10:28:52 1 expert statement.

2 But Nicaragua's characterization that the
3 Nicaraguan resistance are opponents of the government is
4 divorced from the truth. And the letter from the
10:29:03 5 Nicaraguan resistance leaders contradicts Nicaragua's
6 assertion that they were dangerous enemies of the state.
7 It is clear that these armed thugs were deeply aligned
8 with the State and they professed their willingness and
9 continued acceptance of control by the state. Professor
10:29:19 10 Wolfe examined this letter and after reviewing the
11 materials including this letter he concluded that the
12 circumstances of Hacienda Santa Fé fit within
13 state-sponsored land invasions.

14 Paragraph 57 to 65 of Professor Wolfe's
10:29:34 15 first expert report (CES-02) the expert discusses what
16 he terms "state-sanctioned land grabs." In paragraph 78
17 of the second report, Professor Wolfe confirms that the
18 Nicaraguan government used the land invasions to "help
19 followers without the need to spend government money on
10:29:49 20 the purchase and development of housing and farm
21 projects."

22 In his second witness statement, Professor
23 Wolfe reviews the land invasion facts at Hacienda
24 Santa Fé and makes an expert conclusion that the
10:30:00 25 invasion of Hacienda Santa Fé was consistent with

10:30:02 1 actions taken by the State.

2 Professor Wolfe testifies in his second
3 report, CES-05, at paragraphs 119 and 120, we can see
4 that on slide 13, that the occupation was not carried
10:30:16 5 out by opponents of the State but by those controlled or
6 affiliated with them and that the cumulative weight of
7 the consistency of the extrinsic evidence and the
8 testimonial evidence, along with the social media
9 evidence, consistently supports the links between the
10:30:33 10 government and the invaders.

11 So Professor Wolfe wasn't called for
12 cross-examination. Nicaragua didn't offer any evidence
13 to oppose his conclusions, but they didn't call him.
14 The overwhelming majority of Professor Wolfe's evidence
10:30:51 15 is undisputed. Many of the most important
16 characterizations about the Nicaraguan regime are
17 reflected in documents that do not support Nicaragua's
18 counter-narrative whatsoever.

19 Instead, they support Professor Wolfe's
10:31:06 20 conclusions. Remember, the letter that we were looking
21 at is from the mouths of the oppressing armed thugs and
22 emanates from Nicaragua's own evidence and it confirms
23 that the occupiers are acting under the control and
24 direction of the State.

10:31:20 25 And let's be clear. Nicaragua's attempt

10:31:22 1 to characterize the resistance as opposed to the
2 government is nothing short of disingenuous.

3 Let's just look at slide 14 for a minute.
4 This is a picture of Congressman Edwin Castro. Here you
10:31:37 5 can see he is the national spokesman and legal
6 representative of the Sandinista party. Congressman
7 Castro is here announcing the national electoral
8 commission slate for the Alianza comprised of Nicaraguan
9 resistance and Sandinistas under the leadership of the
10:31:50 10 Sandinista party. This is a picture from 2022. This
11 slate has both.

12 Now, he becomes very important. Why?
13 Because we have a second document. This is document
14 C-0284, and this is a July 2018 police report cited by
10:32:08 15 Police Commissioner Marvin Castro. It is addressed to
16 the National Police Chief, Francisco Diaz. This report
17 documented a meeting between Congressman Edwin Castro, a
18 prominent Sandinista, a legal spokesperson for the
19 Sandinista government, and the occupiers of Hacienda
10:32:30 20 Santa Fé.

21 A key excerpt is seen in the report at
22 C-0284 shown here on slide 15. This is a report from
23 the Police Commissioner to the National Police Chief
24 that the invaders have communicated with comrade Edwin
10:32:51 25 Castro and that he has mentioned to them to stay in the

10:32:55 1 property since the government is looking for a way to
2 buy it.

3 Congressman Castro instructed the
4 intruders to continue to occupy the private property.

10:33:07 5 And these instructions are key because after this time
6 the irreparable damage to INAGROSA'S business commences.

7 So Comrade Castro is not a witness before
8 us and according to the police report, he acknowledges
9 this. He acknowledges that they're on private lands and

10:33:25 10 he instructs the occupiers to remain in possession and
11 says we're going to get government resources to buy
12 this. No government resources were ever given to
13 compensate the victims.

14 Now, the government -- we look -- just to
10:33:41 15 make it really more clear, let's go back to the law for
16 a minute. Let's look at slide 16. This is article 4 of
17 the ASRIWA, the Article for State Responsibility for
18 Internationally Wrongful Acts from the International Law
19 Commission, article 4, and in particular when we look at
10:33:58 20 state responsibility, that there's a legislative,
21 executive, judicial branch and an organ of the state
22 includes any person that has that status.

23 Congressman Castro has dual status both of
24 the executive branch and the legislative branch.

10:34:19 25 Riverside has also briefed a very old

10:34:21 1 case, one I like to teach over at law school called the
2 *Caire* case (CL-0168) in Memorial paragraph 645. I put
3 it regularly on my exams for any students that are
4 watching. The jurisprudence demonstrates that acts
10:34:36 5 taken by government persons, such as Congressman Castro,
6 constitute an act of an organ of the state whether they
7 are *infra vires* or *ultra vires*. Under article 4 of the
8 ILC Articles, it makes no difference if you are *infra* or
9 *ultra vires* if you are part of the government. That is
10:34:54 10 the difference between article 4 and article 5.

11 So Congressman Castro's actions constitute
12 measures for which the government has international
13 responsibilities. Once you are part of one of the
14 branches of government, whether you're *infra vires* or
10:35:09 15 *ultra vires*.

16 In the case of the *Caire* case, some
17 off-duty Mexican police officers decided to try to
18 embezzle money from a French citizen. He didn't pay.
19 They shot him in the bar. The Mexican government said
10:35:20 20 "it's not our fault because they were off duty." No,
21 that's unexcused. If you're part of the state, whether
22 you're acting *infra* or *ultra vires*, you're responsible.
23 That's reflected in article 4 of the ILC rules.

24 Congressman Castro instructed the
10:35:39 25 occupiers to remain in occupation, even though he knew

10:35:42 1 they were privately owned, and he knew that the
2 government would find money to purchase the lands and
3 then measures taken by Congressman Castro attribute
4 State responsibility to Nicaragua for the effects of the
10:35:52 5 occupation. He also acknowledged and recognized the
6 acts. This is meaningful under article 11 of the same
7 articles on State responsibility and further
8 substantiates that the occupation was state-directed and
9 sanctioned.

10:36:10 10 Professor Wolfe's second report emphasizes
11 that the government's lack of resistance to the
12 occupation and the direct involvement of high-ranking
13 officials like Congressman Castro indicate state support
14 and approval.

10:36:21 15 We'll see here in slide 17 it sets out
16 what's in paragraph 125, but the key thing I'd like to
17 identify is that he concludes clearly that the State
18 would not be meeting with people if it was opposed to
19 them; that when they were opposed to people, they would
10:36:39 20 take them to jail or beat them and that the absence of
21 police resistance, or resistance from other protective
22 services, supports his view, which is that,
23 foundationally, that this is evidence of government
24 support and sanction.

10:36:58 25 You need to evaluate the evidence in the

10:36:59 1 unique circumstance of the Republic of Nicaragua, the
2 autocratic regime.

3 So the evidence presented -- testimonies,
4 letters, expert reports -- demonstrates that the
10:37:09 5 occupation of Hacienda Santa Fé was not an isolated
6 incident of lawlessness, but part of a coordinated
7 state-sanctioned plan. The actions and inactions of the
8 Nicaraguan authorities during the first three days,
9 combined with the crucial documents, reveal a
10:37:27 10 premeditated strategy from the Sandinista government.

11 And at no time did Nicaraguan officials
12 express any concerns about civil disturbance or the
13 existence of a shelter order as a basis for not
14 providing police protection. The police did not provide
10:37:44 15 protection and they did not justify the failure on the
16 basis of urgent exigencies that Nicaragua now purports.

17 The police also didn't say that the armed
18 thugs were dangerous enemies of the state because they
19 weren't. They were allies and direct agents of the
10:38:01 20 state. Nicaragua's denials now are completely and
21 utterly unconvincing. The acts and the facts
22 demonstrate that the occupation of Hacienda Santa Fé was
23 not a random act of lawlessness, but part of a
24 coordinated plan from an autocratic Nicaraguan state.

10:38:19 25 The objective was to dispossess INAGROSA

10:38:22 1 of its property to support the government's purposes.
2 Let me just take you to slide 18, which sets out
3 paragraph 87 of the second expert report of Professor
4 Wolfe where he says:

10:38:33 5 "The purpose of the land invasions was to
6 benefit the government's supporters. Assuming that
7 INAGROSA was not an FSLN supporter, the seizure of its
8 property would be consistent with the pattern of land
9 invasions."

10:38:48 10 The expert has addressed this, he's
11 thought about it, he's considered all the evidence, he's
12 evaluated the pieces, and we know that INAGROSA was not
13 an FSLN supporter. It was just a business operating
14 trying to grow things and sell them to the export market
10:39:08 15 to do something beneficial for the economy.

16 Nicaragua's failure in its duty to protect
17 is clear. Nicaragua could have done more, but chose not
18 to do it. They chose to do little to protect the
19 victims who sought protection. And although Nicaragua's
10:39:20 20 denials now are unconvincing when weighed against the
21 compelling evidence of state involvement and
22 orchestration, we can now see quite transparently what
23 went on.

24 So that takes us to actually look a little
10:39:35 25 bit at the context and nature of the occupation. Now,

10:39:37 1 on paper, and in its constitution, Nicaragua has a
2 long-established rule of law principle, including
3 separation of powers, equal protection, due process, the
4 right to an independent judiciary and individual
10:39:50 5 freedoms. But these rule of law principles aren't being
6 followed in practice and independent experts have
7 confirmed that Nicaragua has actively and systemically
8 dismantled due process and the rule of law, effectively
9 operating as an autocratic dictatorship.

10:40:06 10 In the last two witness statements of
11 Professor Wolfe, he considers the context that it is
12 necessary for you to examine here, and he confirms in
13 the spring of 2018 the Sandinista government used
14 unbridled force against civilians and the coercive
10:40:21 15 weight of the state to suppress peaceful expression of
16 peaceful protest over unpopular pension reform. The
17 fundamental human rights atrocities and acts of violence
18 against citizens of Nicaragua have resulted in extensive
19 international sanctions from the EU, Switzerland,
10:40:42 20 Canada, the United States and the United Kingdom.

21 In paragraph 58 of Professor Wolfe's first
22 expert report, he relies on the UN human rights experts
23 and that's over here in slide 19, and he says that the
24 UN human rights experts here -- he says that the FSLN --
10:41:03 25 that is the Sandinista government -- "has, on one hand,

10:41:06 1 supported land invasions ... used them to punish
2 opponents by having police and other security officials
3 refuse to intercede when land invasions take place."
4 Exactly what took place here. Exactly.

10:41:22 5 Now, the most common use of land invasions
6 was to punish those who overtly -- sorry.
7 The most common use of the land invasions
8 was to punish those who did not overtly support the
9 government and to reward supporters of the government's
10:41:42 10 program by giving them those lands. Redistribution.
11 They took it and gave it to them.
12 And Exhibit C-0539 is a 2022 US Human
13 Rights Practices Report on Nicaragua shown on slide 20.
14 It states:
10:41:59 15 "The government regularly failed to take
16 effective action with respect to seizure, restitution or
17 compensation of private property."
18 So here you have another report confirming
19 the regular nature of failure to engage in these types
10:42:14 20 of activities.
21 And this view of course is supported by
22 the events that occurred during the later part of the
23 invasion because there are meetings with prominent
24 Sandinista leaders and the occupiers and the police are
10:42:25 25 failing to take action. And here the government leaders

10:42:28 1 recognized the occupiers' actions, they acknowledged
2 them, they instructed them to remain in occupation while
3 the government finds money. The decision not to act
4 swiftly to remedy injustice against actions taken
10:42:43 5 against foreigners such as Riverside profoundly raises
6 issues under the treaty, the CAFTA.

7 Now we are going to examine the broader
8 context of the occupation. We can see that to try to
9 understand some more. We can go look at the UN report,
10:42:55 10 C-0535, and the UN experts concluded that the Nicaraguan
11 government took systemic and concerted actions amounting
12 to crimes against humanity. They say that they were
13 "intentionally orchestrated by the highest echelons of
14 the government of Daniel Ortega and Rosario Murillo
10:43:14 15 against ... the population of Nicaragua for political
16 reasons." This is the UN.

17 The evidence confirms the frequent use of
18 state-sponsored land invasions and this includes
19 Professor Wolfe's confirmation that the invasion of
10:43:30 20 Hacienda Santa Fé was such a government-sponsored land
21 invasion.

22 I'm sorry to spend so much time on this
23 but they've done such denials, they've put so much
24 evidence in, we have had to do so much work to deal with
10:43:41 25 this. We have to unpack all the pieces here and it

10:43:43 1 unfortunately takes a little bit of time.

2 But the Sandinista supporters illegally
3 seized land with explicit backing of the authorities at
4 a time when the government created a persistent climate
10:43:55 5 of terror that is consistent with a vigilant police
6 state.

7 If we look to your slide 21, we'll see an
8 article in La Prensa. La Prensa was a newspaper that
9 used to be an independent newspaper that could operate.
10:44:05 10 It no longer can operate in Nicaragua and has to move
11 out of the country. In July 2018, La Prensa, which
12 still provides independent and fair media to the people
13 of Nicaragua, indicates that land seizures have already
14 affected more than 30 landowners in various parts of the
10:44:23 15 country. Here we have an article that quotes the
16 president of the Higher Council of Private Enterprise
17 (COSEP).

18 Here he talks about the situation. He
19 talks about the new form of confiscation that they're
10:44:38 20 seeing, there's examples going on at this time. He says
21 more than 30 landowners from the business community have
22 had this problem. And then he says:

23 "There is management of political,
24 municipal and government supporters behind these
10:44:55 25 actions."

10:44:56 1 So the independent experts from the UN
2 Human Rights Committee confirm that Nicaragua was the
3 direct cause of the violence in 2018 and when large
4 scale protests erupt against the regime, the ruling
10:45:10 5 Sandinista government relied on repressive state
6 apparatus to sustain the political project of the
7 current government and they engaged police violence to
8 suppress protests, prompting the finding of crimes
9 against humanity by the Inter-American Commission on
10:45:29 10 Human Rights.

11 If we look at paragraph 97 and 110 of
12 Professor Wolfe's second expert report, he confirmed the
13 autocratic trends that are developing in Nicaragua at
14 this time in the summer of 2010 (sic) and he relies on
10:45:43 15 his conclusions on UN and OAS experts -- including the
16 OAS report, Exhibit C-0192 -- to confirm the lack of
17 independence of the police, lack of independence of the
18 judiciary and the entire government in this process.

19 And despite these international sanctions
10:46:02 20 and condemnations, Nicaragua has continued its evolution
21 towards autocracy, crushing grassroot opposition.

22 So let's focus again on who's not here.
23 Let's focus on the missing witnesses. Nicaragua has
24 failed to produce any evidence from Inspector Calixto
10:46:22 25 Vargas, the police officer who responded at Hacienda

10:46:27 1 Santa Fé in June of 2018. There are no records of any
2 reports made by Inspector Vargas to his superiors or any
3 notes from his superiors to him, nor any notes from him
4 to his inferiors who he is instructing as well. We have
10:46:43 5 no communication of anything, no notes, no records, no
6 pictures. This lack of documentation strongly suggests
7 the police did not want to keep a record of their
8 actions or their inactions during this time of the
9 seizure.

10:46:56 10 Nicaragua has not presented any firsthand
11 police witnesses who were at Hacienda Santa Fé in
12 addition to Inspector Vargas. In addition, Nicaragua
13 has brought forth no factual witnesses with direct
14 eyewitness evidence of the invasion. Key figures such
10:47:11 15 as Jinotega Mayor Leonidas Centeno, the one described in
16 the social media post as instructing, the one that the
17 occupier said had instructed them to take it, he's not
18 here. Nothing from him. No records that he was ordered
19 to produce some records. Nothing. He's supposed to be
10:47:27 20 the mastermind. Where is he?

21 How about San Rafael del Norte Mayor Norma
22 Herrera? Where is she? She actively supported the
23 continued occupation. She's conspicuously absent.

24 None of the occupiers themselves have been
10:47:42 25 called. We have a situation where Mr. López, who's a

10:47:46 1 witness before this Tribunal, provides evidence which he
2 claims is from Wama, one of the leaders. But where is
3 Wama? We have hearsay from Mr. López. Where is Wama?

4 Why did Nicaragua not bring the invader to
10:48:01 5 this Tribunal?

6 In contrast, we have testimony from
7 INAGROSA'S staff and the victims themselves, in person.
8 They risk their personal safety by giving accounts to
9 this Tribunal. Because the evidence that they're going

10:48:18 10 to talk about is deeply traumatizing and we have to be
11 mindful of the fact that we're engaging in triggering
12 events as we go through their evidence, highly, highly
13 difficult types of issues. Victims who have been
14 threatened with death and have been beaten, they've gone
10:48:34 15 through horrific situations and they're here. They're
16 before you. You can assess it. Where are the others?

17 What's most lacking and most telling and
18 most significant is information from a highly credible,
19 highly respected individual who's not with us. Not with
10:48:59 20 us not because he's not alive. It's for another reason.

21 Paul Reichler, Nicaragua's original lawyer
22 in this arbitration, an unbelievably well respected,
23 highly regarded scholar of international law, a very
24 talented international lawyer and a long time legal
10:49:24 25 representative for the Republic of Nicaragua, close to

10:49:27 1 40 years, issued a letter publicly and resigned from
2 being counsel in this arbitration. He was counsel in
3 this arbitration and then resigned.

4 Even though you as opposing counsel have
10:49:42 5 tremendous respect for Paul Reichler, who is a man of
6 great integrity and highly decent, I was looking forward
7 to having the opportunity to engage with him here.

8 Mr. Reichler expressed profound
9 disappointment with the current regime. Slides 22 to 24
10:50:01 10 set out extracts from his letter. So if we first turn
11 to slide 22, Mr. Reichler -- it's Exhibit C-067.

12 Mr. Reichler says -- he talks about, at
13 the beginning, of his respect for the original Daniel
14 Ortega, who he found -- defeated the Somoza regime and
10:50:24 15 led the revolution and was the godfather to several of
16 his children. I believe two of them.

17 But then he says "I'm ready to now
18 terminate my relationship with you and your government.
19 I don't know what caused you to change, but you're no
10:50:37 20 longer the Daniel Ortega who I so greatly respected."

21 And he says:

22 "It's inconceivable to me that
23 Daniel Ortega would have repressed peaceful
24 demonstrations so ruthlessly, resulting in hundreds of
10:50:52 25 tragic deaths in April 2018."

10:50:56 1 If we go to the next slide, he says:
2 "It is even more inconceivable to me that
3 Daniel Ortega would have arrested, confined in
4 intolerable conditions and brought to trial more than 50
10:51:04 5 other leading citizens ... on trumped-up charges that
6 are no more than a pretext for eliminating dissent and
7 opposition ..."
8 Let's go to the next one.
9 "It is inconceivable to me that Daniel
10:51:19 10 Ortega who I proudly served would have destroyed the
11 democracy that he was instrumental in building and
12 established a new dictatorship, not unlike the one he
13 was instrumental in defeating, with sham elections, a
14 rubber stamp legislature, a corrupt judicial system that
10:51:38 15 is incapable of rendering justice, and the silencing of
16 free expression and independent news media."
17 This is a lawyer for Nicaragua, the
18 unbelievably highly respected counsel, a man of
19 unbesmirched character and reputation. He says
10:52:01 20 Nicaragua operates as a dictatorship, the judicial
21 system is corrupt and is incapable of rendering justice,
22 an issue that is before us that we're going to talk
23 about a little bit too, and Mr. Reichler confirms what
24 Nicaragua now denies, that the systemic unlawful
10:52:13 25 measures taken by Daniel Ortega's dictatorship in 2018

10:52:16 1 resulted in tragic deaths and the ruthless repression of
2 peaceful demonstrators of free expression. It's right
3 there.

4 We have an expert -- we have other
10:52:28 5 experts, they're all consistent -- they're consistent
6 with their own lawyer who had to leave as a basis of
7 conscience because he couldn't represent reprehensible
8 clients engaged in such horrifically bad behavior
9 because there are standards of counsel and standards in
10:52:45 10 international law and he would not step below that.

11 The use of force by the State was not a
12 reaction. It was the practice of the Sandinista
13 government. Ongoing, calculated, systemic. And the
14 context that we see here aligns with the systemic
10:53:06 15 process as applied by the government during the invasion
16 and the occupation of Hacienda Santa Fé.

17 So Nicaragua's futile attempt to deny its
18 responsibility in the occupation of the taking of
19 Hacienda Santa Fé by reopening some long settled issues
10:53:26 20 unconnected to the 2018 state-sponsored land invasion is
21 one of its ideas of overall denial. They said the prior
22 occupiers from 15 years earlier who were evicted by the
23 Nicaraguan courts and relocated by the government have
24 somehow caused this and this is unrelated to the
10:53:46 25 Sandinista regime's occupation. This is a pretense,

10:53:50 1 nothing more.

2 We have the issue of foreknowledge and
3 inaction. The Nicaraguan police knew the
4 government-backed invaders would occupy and take

10:54:01 5 Hacienda Santa Fé, yet they did nothing to fulfill their
6 duty to protect private property and human lives.

7 We have the concealment of alliances by
8 the Republic of Nicaragua. They gave you a disingenuous
9 attempt in the counter-memorial, including in their

10:54:16 10 witness evidence, to hide the existence of Sandinista
11 Nicaraguan resistance alliance. They failed to disclose
12 the alliance that had been in existence for over a
13 decade before the invasion of Hacienda Santa Fé,
14 assuming that we would never know.

10:54:33 15 The former Nicaraguan resistance were
16 allies of the state, not enemies in 2018. Nicaragua's
17 statement is simply disingenuous. We'll deal with that
18 when we get to costs in this case.

19 Nicaragua's misguided excuse of adding the
10:54:51 20 Nicaraguan State to the title of Hacienda Santa Fé as
21 part of its international law responsibility to protect
22 property by taking it away, the only purpose of this was
23 to try to impair INAGROSA'S financial capability by
24 placing Nicaragua's name on the title. This was not
10:55:12 25 only a de jure taking of the legal rights, but designed

10:55:16 1 to interfere with the capacity of Riverside and INAGROSA
2 to be able to fund their ongoing operations by tying up
3 their largest asset so Nicaragua could plead a de jure
4 when they had already done a de facto by this legal
10:55:35 5 maneuver and the regime unfairly relied on the
6 detrimental effects of that action to then say well now
7 Riverside is insolvent because it doesn't have available
8 money to be able to access things, ignore the fact that
9 they are holding all of their assets and the very deep
10:55:50 10 wealth to the value of that land and then claimed that
11 it's a security for costs in this case, which thankfully
12 this Tribunal denied, because that's an outrageous
13 claim. You're relying on your own wrongful act and then
14 rely on that? That's an abuse of process. We know
10:56:07 15 international law doesn't allow that.

16 And to be clear, Renaldy Gutiérrez, the
17 legal expert that we have brought into this case, his
18 evidence demonstrates that Nicaragua launched a legally
19 defective domestic judicial process. They failed to
10:56:22 20 notify the parties that were involved. They used a
21 flawed process to legitimize the continued control over
22 Hacienda Santa Fé. And that control persists to this
23 day.

24 So the situation that Riverside faces is a
10:56:38 25 little bit like a bullfight. In a bullfight, the bull,

10:56:42 1 unaware of the spectacle, believes it is engaging in a
2 fair contest. It is led around the ring, getting
3 increasingly exhausted and injured until it is
4 ultimately defeated.

10:56:54 5 Riverside entered Nicaragua with good
6 faith, believing in fair treatment and adherence to the
7 rule of law. Riverside complied with regulations,
8 created jobs, and contributed to local economy. Yet it
9 has been led astray, repeatedly injured by unfair
10:57:09 10 practices, much like the bull in the ring.

11 The Tribunal represents Riverside's only
12 hope for justice. Riverside doesn't seek any special
13 treatment. It seeks fair treatment, adherence to the
14 rule of law, due process and the protections under the
10:57:26 15 CAFTA.

16 The political environment in Nicaragua
17 obstructs fairness. Foreign investors lack protection
18 in Nicaragua and CAFTA is their only shield against this
19 unfair treatment. And we respectfully request that this
10:57:44 20 Tribunal rectify the grave injustice.

21 Now, I don't entirely know where I am in
22 my time because of the little issue. So I don't know
23 whether I can start a little bit on law or whether we
24 can take our break now. I'm inclined to think that we
10:58:03 25 can do that but perhaps the secretary could help me to

10:58:06 1 understand that.

2 MS. CONOVER: Mr. Appleton, so far you

3 have used an hour and 14 minutes of your time, excluding

4 the time spent on the technical ...

10:58:20 5 MR. APPLETON: I think we should continue

6 a little bit longer. Where do you think 90 minutes

7 would be in terms of the clock, just to help me?

8 MS. CONOVER: That would be around 11:15.

9 MR. APPLETON: Let's do a little bit more

10:58:33 10 if that's alright or do you want your break now?

11 PRESIDENT: It is fine. The plan was to

12 have the break around 10 past 11 but now that we've lost

13 the five minutes, quarter past 11 is fine.

14 MR. APPLETON: Actually, if you don't

10:58:49 15 mind, 11:00 is probably fine for the break because I'm

16 going to turn to the law. It's a good place to go and

17 we can then use some of this to figure out and make sure

18 we don't have any other problems as we go along. Would

19 that be acceptable?

10:59:01 20 PRESIDENT: That is entirely acceptable.

21 MR. APPLETON: I think this is an

22 appropriate time.

23 PRESIDENT: Let's break now for 15 minutes

24 and we will resume at a quarter past eleven.

10:59:09 25 (Brief Recess)

11:18:26 1 MR. APPLETON: Let's begin. So as I left
2 you at the break, I promised that we would start to talk
3 a little bit about the treaty and some international law
4 which of course gives me a wonderful opportunity to talk
11:19:41 5 about some of the key issues in this case.

6 I'm going to focus on key legal
7 principles, but of course they've been briefed in the
8 pleadings and my goal here is not to replace what we've
9 got in the pleadings, but to highlight some key
11:19:57 10 principles that will help us as we go along understand
11 the core obligations in general and then to identify
12 things that will be relevant as we hear the witness
13 evidence. And we'll come back to examine some of these
14 when we get to the closing of course, after we've had
11:20:14 15 the benefit of having the witness evidence that's here.

16 So the most straightforward violations
17 include the breach of full protection and security under
18 CAFTA article 10.5 as well as the violations of national
19 treatment and most-favored nation treatment under CAFTA
11:20:36 20 articles 10.3 and 10.4.

21 Additionally, we will address the breaches
22 of fair and equitable treatment which is also in 10.5,
23 including the failure to uphold due process and the rule
24 of law. Importantly, there is no dispute between the
11:20:55 25 parties with respect to state responsibility on those

11:20:58 1 areas and these areas because they directly involve
2 actions taken by government officials.

3 When we start to examine the failure to
4 provide compensation for the unlawful taking of property
11:21:08 5 contrary to CAFTA article 10.7, we start to have some
6 issues that bring us to the questions of state
7 responsibility and attribution. But that's not an issue
8 for those other issues because the actions of the states
9 are engaged directly by the organs of the state

11:21:30 10 themselves.

11 So let's turn first to full protection and
12 security. The full protection and security obligation
13 mandates that the State takes diligent steps to
14 safeguard the investments of a treaty investor. In this
11:21:44 15 context, we focus on physical security, although the
16 obligation is broader, encompassing legal security under
17 the rule of law, a concept that's also inherent in the
18 fair and equitable treatment standard.

19 Now, the protective services failed to
11:22:00 20 take diligent steps to address the unlawful occupation.
21 We've already talked about some of those. We will
22 identify some additional evidence in a moment. But as
23 we've reviewed, the failure of the police to act
24 decisively when the occupation occurred began in June of
11:22:16 25 2018. And the case law on full protection and security

11:22:20 1 is briefed in both memorials. I'm not going to take you
2 all through it, but it's fairly clear about what the
3 standards that we need to look at are.

4 The situation escalated in July 2018, so
11:22:34 5 June it started, July it escalates as the occupation
6 intensified and expanded. And yet again, the police and
7 other protective services failed to protect INAGROSA.
8 The second occupation led to the seizure of INAGROSA's
9 operational headquarters, the destruction of the Hass
11:22:54 10 avocado plantations and the illegal logging of valuable
11 hardwood species in its standing forest. These actions
12 caused significant damage to INAGROSA and to Riverside.

13 Now, INAGROSA promptly notified the police
14 on June 16, 2018, marking the first of those three
11:23:11 15 fateful days that we talked about. And despite the
16 urgency, the police failed to respond. They failed to
17 come out that first day. When they came the second day
18 they didn't show up to the scene of the invasion, but
19 something kilometers away. Far, far away. And the
11:23:28 20 third day they're gone. Send me a postcard, they're
21 nowhere nearby.

22 It wasn't until the fact that INAGROSA
23 sent people to try to find out. They're not there. Not
24 only did INAGROSA inform the police of what was going
11:23:44 25 on, but Captain Herrera in his witness testimony

11:23:48 1 admitted to having intelligence from police sources
2 about the invasion. Captain Herrera was fully aware of
3 the situation when he received a call from Luis
4 Gutiérrez. Yet, the protective services did not provide
11:24:00 5 INAGROSA with updates, nor did they suggest measures to
6 address the public safety issues posed by such an
7 occupation of armed forces.

8 Furthermore, the police took no steps to
9 reinforce Hacienda Santa Fé's defenses against further
11:24:16 10 incursions in June or July. The police failed to
11 protect the physical safety of the employees or the
12 property at Hacienda Santa Fé and, predictably, the
13 occupation expanded in July.

14 Nicaragua claims that Mayor Centeno held a
11:24:30 15 meeting on August 11, 2018 to tell the invaders to
16 leave. There are no notes and records from this
17 meeting. They were supposed to be produced. There's
18 nothing. INAGROSA was not invited to this meeting so
19 they can't tell you anything about it. Nicaragua says
11:24:44 20 the invaders immediately left that day, but that is also
21 not correct.

22 On August 14, 2018, the police, Luis
23 Gutiérrez and the security team visited Hacienda
24 Santa Fé. They went to the Casa Hacienda, the
11:25:01 25 headquarters. Yet again, on that day the police failed

11:25:05 1 to take diligent steps to secure the property and remove
2 all remaining occupiers. INAGROSA never regained the
3 property in the summer of 2018. Some invaders never
4 left Hacienda Santa Fé in August 2018.

11:25:19 5 Nicaragua claims in footnote 931 of its
6 Rejoinder Memorial that "it is undisputed that the
7 Nicaraguan government officials evicted all of the
8 invaders in a peaceful manner on August 11, 2018."

9 On the farm in Kansas we call that
11:25:39 10 hogwash. This is misrepresentation. That's not true.

11 Riverside has two eyewitnesses before this Tribunal who
12 confirm that there were still unlawful occupiers at
13 Hacienda Santa Fé present when they visited on
14 August 14, 2018. Hacienda Santa Fé was not cleared of

11:25:55 15 all invaders on August the 11th, nor at any time in
16 August of 2018, because the invaders who departed --
17 those that did depart on August 11th -- returned back to
18 Hacienda Santa Fé within a few days anyways and they
19 remained there for three years. During this time

11:26:13 20 INAGROSA'S operations suffered irreparable damage.

21 The sequence of events starkly illustrates
22 Nicaragua's abject failure to uphold CAFTA's full
23 protection and security obligation, and the consequences
24 have been devastating and the state's inaction has led
11:26:31 25 to significant and ongoing harm.

11:26:34 1 In comparison, Nicaragua's internal police
2 reports corroborate that at the very same time as the
3 occupation of Hacienda Santa Fé is under way, the
4 National Police proactively were initiating
11:26:49 5 investigations and taking active steps towards evicting
6 illegal occupiers in other properties in Nicaragua. And
7 these reports document extensive police intervention
8 measures and contemplated in other large-scale invasions
9 involving as many as 200 armed individuals. However,
11:27:08 10 these decisive actions to defend the property were
11 conspicuously absent with respect to Hacienda Santa Fé.
12 Nicaragua must explain why it did not take
13 similar measures at Hacienda Santa Fé when it did so
14 under the same types of circumstances elsewhere.
11:27:33 15 The juxtaposition of robust action in
16 other instances with complete inactivity at Hacienda
17 Santa Fé highlights the inadequacy, misfeasance and
18 recklessness of Nicaragua's intentional misconduct.
19 When we look at paragraphs 35 to 37 of the
11:27:51 20 Reply Memorial, we'll see there's some charts that we've
21 set out that summarize the more diligent protective
22 actions taken by the police. Chart C1 lists five police
23 actions. I'll put them up on the screen. These were
24 taken by the police in the summer 2018. We can see them
11:28:09 25 on slide 25.

11:28:10 1 We note the first two of these deal with
2 Inversiones Nela and the second one is Dscoto. They
3 involve hundreds of unlawful occupiers. This police
4 activity occurred before July 31, 2018 because that was
11:28:29 5 the date these reports were issued. All the reports
6 were issued July 31st.

7 So we can see what's going on in that
8 summer from the reports filed from the Republic of
9 Nicaragua and sent to the National Police Chief.

11:28:43 10 Chart C2 on the next slide shows five
11 more, and these actions show seizures that occurred in
12 the fall of 2018. Here we see additional examples. If
13 we look at C3, if we go to the next one for a moment,
14 here we see eight more situations where the police were
11:29:03 15 actively engaged in potential police actions to address
16 police seizures in 2018. That's on slide 27.

17 Together, these three charts illustrate 18
18 examples of police protection. They demonstrate that
19 the police in Nicaragua were actually actively carrying
11:29:22 20 out active investigations, actively taking steps to
21 remove occupiers. The police activity was taking place
22 in areas where the most significant demonstrations were
23 taking place, in the capital Managua and the second
24 largest city, Leon.

11:29:41 25 The National Police Force is a national

11:29:46 1 body that is a unified structure under the law in this
2 structure. So they were actively doing things. They
3 all come from police reports.

4 In comparison, INAGROSA received no police
11:29:55 5 protective activity. Indeed, the only time police
6 protective action was provided to INAGROSA was years
7 later, after Riverside brought this international claim.
8 Never could waiting three years meet the full protection
9 and security standard.

11:30:16 10 Now, in its defense, Nicaragua contends
11 that there were extenuating circumstances justifying its
12 actions. But a thorough examination of Nicaragua's
13 justifications reveals that these arguments lack
14 substance and profoundly lack credibility.

11:30:32 15 First, Nicaragua claims that President
16 Ortega issued an executive order instructing the
17 Nicaraguan police to remain in their barracks between
18 May and July 2018 to facilitate peace talks. Riverside
19 disputes the existence of any such order. Whether such
11:30:51 20 an order was issued or not does not absolve Nicaragua in
21 any event of its obligation to provide full protection
22 and security and established case law unequivocally
23 affirms that this full protection security obligation
24 persists even during extreme civil disturbances.

11:31:08 25 Indeed, it becomes even more crucial during civil

11:31:12 1 disturbances, and Nicaragua has failed to produce this
2 order despite being instructed to produce it before this
3 Tribunal.

4 What Nicaragua's offers is a video of a
11:31:24 5 church-based dialogue and here the president offered a
6 promise to reduce the use of deadly force against
7 peaceful protesters, contingent on the peaceful
8 protesters ceasing their demonstrations. This offer was
9 a political gesture rather than a formal government
11:31:42 10 order and the real story about the national dialogue is
11 actually confirmed in a report from the Organization of
12 American States, their Interdisciplinary Group of
13 Independent Experts, Exhibit C-0131. Here it says on
14 slide 28:

11:31:56 15 "The experts confirmed that there was an
16 offer from the State to remove the police and the shock
17 troops ..." These are the paramilitaries that are
18 supporters who cause violence. So the offer from the
19 State is to remove the police and the shock troops from
11:32:12 20 the street protests, but this agreement fell apart a few
21 days later. The talks continued and again fell apart
22 when the Catholic church stated on May 30th that:

23 "It is impossible to continue the dialogue
24 while people are denied the right to protest freely and
11:32:30 25 they continue to be repressed and murdered."

11:32:34 1 There's no order. There's nothing. There
2 was just violence by the State and the OAS experts
3 confirmed that "in June, however, the mechanism fails
4 and is discontinued during the six-month duration of
11:32:49 5 their [report] mandate."

6 So the experts say there was no shelter
7 order. Nicaragua doesn't produce it. They claim it.
8 They don't produce it. They say, "oh, the president
9 said it." You can hear the witnesses say they never had
11:33:06 10 it. But the independent experts reviewing this confirm
11 exactly what took place. This is mumbo jumbo. This is
12 not anything that is real. The events show us, the
13 evidence show us, uncontested facts demonstrate, that
14 police were not confined to their barracks in June of
11:33:26 15 2018. The suggestion of restricted duty is an outright
16 fabrication before this Tribunal.

17 Both Captain Herrera and Commissioner
18 Castro, Nicaragua's own witnesses, acknowledge that
19 police were present at Hacienda Santa Fé in June of
11:33:41 20 2018. So this directly contradicts the purported
21 shelter order and it indicates the police were actively
22 engaged outside their barracks, but of course we have
23 all of those examples from the police's own reports to
24 the National Police chief. There's no order. This
11:33:59 25 first excuse is simply unsupported by the facts and the

11:34:02 1 evidence and is completely and utterly disingenuous.
2 The lack of credible documentation and the police's
3 contradictory actions highlight the implausibility of
4 this defense.

11:34:14 5 Then they have a second excuse, that the
6 National Police were constrained by the exigencies of
7 civil strife. First of all, let's just think about it.
8 Civil strife didn't last for three years. How does that
9 explain the three-year period? Once the protests died
11:34:34 10 down Nicaragua did nothing to oust the invaders. They
11 waited three years. It doesn't make any sense. It was
12 after the treaty claim they finally decided to try to do
13 something. They tried to minimize their exposure for
14 damages because they woefully violated the treaty and
11:34:49 15 anyone would see that and they certainly recognize
16 that's why they did this.

17 In any event, established jurisprudence
18 states that the obligation of the state to provide
19 protection and security persists even during periods of
11:35:00 20 civil strife and warfare. The state can't abdicate its
21 duty to protect foreign investments under the CAFTA by
22 citing internal disturbances.

23 The Reply Memorial discusses the
24 jurisprudence and I want to talk about one case, *Cengiz*
11:35:16 25 *v. Libya* (CL-0192). The *Cengiz* tribunal concluded that

11:35:24 1 Libya had an obligation to provide full protection and
2 security amid a full-out civil war taking place in Libya
3 after the Arab Spring.

4 Riverside noted in its Reply Memorial
11:35:37 5 paragraph 1310 that the *Cengiz* tribunal found a duty
6 upon Libya to exercise "reasonable care" to protect the
7 foreign investor's property against the acts of
8 non-state actors while considering Libya's means and
9 resources and the general political and security
11:35:54 10 situation in the country. That was a non-state, that
11 was a state in complete and utter disarray. There was
12 significantly less than what was going on here and they
13 still had the obligation and the duty.

14 So the formulation of full protection and
11:36:03 15 security by *Cengiz* is particularly helpful. If we look
16 at slide 29, we'll see paragraph 403 because we talk
17 about -- there's two duties that are here: a negative
18 obligation to refrain from directly harming the
19 investment by acts of violence attributable to the
11:36:20 20 state. That is when the state acts, it is the
21 obligation of result. And a positive obligation to
22 prevent third parties from causing physical damage to
23 such investment, an obligation of means.

24 So full protection and security has both
11:36:39 25 elements to it, depending on whether the state's

11:36:42 1 involved directly or not directly.

2 But Nicaragua's argument here completely
3 doesn't withstand scrutiny. That is fundamentally,
4 okay, the negative obligation to refrain from directly
11:36:59 5 harming the investment by acts of violence attributable
6 to the State that are put out in Cengiz. As we say,
7 both of the Cengiz standards are invoked, are brought
8 into question in this case, and Nicaragua's arguments
9 fail to withstand scrutiny. The supposed executive
11:37:15 10 order lacks evidentiary support, as we talked about, and
11 the police actions during the relevant period contradict
12 the existence of any such order and Nicaragua's reliance
13 on civil strife for its failure is untenable under the
14 facts and established international case law.

11:37:35 15 The independent experts concluded
16 foundationally, and the reason we've taken you through
17 that evidence, is the cause of the violence in Nicaragua
18 was caused by the State. It amplified the violence that
19 justified violent repression resulting in the deaths of
11:37:51 20 protesters after their incarceration or before. Again,
21 this is detailed in the expert evidence discussed at the
22 Operation Cleanup, paragraphs 43 to 46 of the first
23 expert report of Professor Wolfe, and in the detailed
24 supporting reports from international bodies and others.

11:38:08 25 The UN expert team has stated that these

11:38:11 1 activities were contrary to international law
2 themselves.

3 In Reply Memorial, 1516 to 1518, it is a
4 general principle of international law that no one
11:38:21 5 should be allowed to reap advantages from their own
6 wrong. This is the *nullus commodum* principle. It
7 prevents Nicaragua from relying on a violation of
8 international law obligations to justify some other
9 basis, to justify an exception, for example. You cannot
11:38:41 10 rely on your own bad acts to be able to justify the
11 indication of an exception or a reservation or something
12 else. The requirement is to carry out the obligation in
13 good faith. You have to have clean hands. Otherwise,
14 an abuse of process. You can't do that.

11:39:00 15 Nicaragua improperly relies on its own
16 internationally unlawful measures to excuse its
17 non-performance of the treaty obligation and this is
18 completely in violation of the *pacta sunt servanda*
19 principle.

11:39:14 20 In Reply Memorial paragraph 1518,
21 Riverside noted the *nullus commodum* rule applied to
22 situations where a state can use connivance for its own
23 wrongfulness. Foundationally, the explanations that are
24 being offered to you by the Republic of Nicaragua are
11:39:31 25 disingenuous. The state is prevented from invoking the

11:39:36 1 breach to the disadvantage of the other party either to
2 found a right or a defense. That is the basis of *nullus*
3 *commodum*.

4 As Professor Wolfe confirms, Nicaragua has
11:39:47 5 engaged in such disingenuous conduct. The international
6 experts resoundingly have rejected Nicaragua's
7 justifications for its use of deadly force and systemic
8 state violence. The UN and the OAS have confirmed this
9 as well.

11:40:03 10 Yet, in this arbitration Nicaragua relies
11 on its wrongful acts to justify its failure to take
12 police action. It also attempts to invoke other
13 exceptions to the treaty. But we know that the general
14 principles of international law never could permit
11:40:19 15 Nicaragua to rely on its harmful acts to evade a treaty
16 obligation or to invoke an exception or reservation in
17 good faith.

18 As shown earlier, Nicaragua provided
19 extensive evidence showing at the very time it took no
11:40:32 20 action to assist Riverside, the police were providing
21 extensive and active assistance to at least 18 specific,
22 identified private landowners who had suffered land
23 invasions.

24 We will return to all of this in the
11:40:44 25 closing but we just wanted to highlight the relevance of

11:40:46 1 what the Nicaraguan police protective services did and
2 did not do at Hacienda Santa Fé, especially when these
3 acts and omissions occurred.

4 In addition, there is the government
11:40:57 5 officials' knowledge of plans for criminal actions and
6 their failure to take appropriate actions to minimize
7 the harm on Riverside and INAGROSA, yet another breach
8 of international law. And that would be under article
9 10.5 of the CAFTA.

11:41:16 10 Now we turn to national treatment. In
11 addition to being an interpretive rule and principle of
12 the CAFTA as set out in CAFTA article 1.2, national
13 treatment is used in multiple different CAFTA chapters.
14 So it's a principle. It's not just in chapter 10 we're
11:41:35 15 looking at, we understand it means more than just
16 whatever we have in chapter 10. The text of CAFTA
17 article 10.3(1) is set out here on slide 30. I've set
18 it out and it enshrines national treatment.

19 We see again the basic test:
11:41:51 20 "Each party shall accord to investors of
21 another party treatment no less favorable than it
22 accords, in like circumstances, to its own
23 investors ..."

24 And then there's a couple of criteria to
11:42:02 25 go with it.

11:42:03 1 So we really have two simple criteria that
2 we really need to focus on. Are the investors or the
3 investments of the investors in like circumstances? Are
4 they like? Second, we look to is the treatment less
11:42:14 5 favorable? That's our test. That's all Riverside has
6 to go through.

7 Let's look at the meaning of like
8 circumstances. The first requirement is that we have to
9 think of likeness is not identical. We use the term
11:42:28 10 "like circumstances" not "identical circumstances".
11 Thus, while there can be many differences in
12 circumstances, once the threshold of likeness is met,
13 treatment comparison follows.

14 Crucially likeness must be considered
11:42:41 15 within the context and the circumstances. So as we
16 noted earlier, article 2 of Law 872, the police law,
17 says that "the Nicaraguan police law confirms a general
18 duty of general applicability entitlement to all in
19 Nicaragua for police protection."

11:42:58 20 When evaluating likeness in the context of
21 government regulations of general application, the
22 Tribunal must consider all of those competing for the
23 similar regulatory treatment. It's of general
24 application. It's everybody. That's what an act of
11:43:12 25 general application means.

11:43:13 1 So under Law 872, everybody in Nicaragua
2 is like for the receipt of protection of police
3 treatment because that's what their law and their
4 obligation is.

11:43:24 5 This approach aligns with the NAFTA
6 tribunal in *Grand River* and the *Occidental Petroleum*
7 cases that we cited in our materials. And in this claim
8 again, all those like INAGROSA who expected to receive
9 police protection from the government are in like
11:43:39 10 circumstances.

11 So for the purposes of likeness, this is
12 the class of investment whose treatment we have to
13 consider. And the law clearly establishes that police
14 protection here is a regulatory expectation. So that's
11:43:52 15 our first piece. Likeness is everybody in Nicaragua
16 because that's what the law establishes. They're all in
17 essence competing for access for police services.

18 Second is treatment. CAFTA article 10.3
19 requires that we look at treatment and we consider
11:44:13 20 treatment after evaluating like circumstances. The
21 interpretive task begins with likeness and we look at if
22 they are like, we then look to is there a difference in
23 treatment?

24 Here the goal is provide what we call
11:44:27 25 quality of competitive opportunities that you can have

11:44:30 1 different treatments but no less favorable treatment
2 provided. You can have different regulatory treatment
3 to produce different outcomes, provided that the parties
4 are treated with evenhandedness, ensuring equal
11:44:41 5 opportunities for foreign investments with local ones.
6 To be evenhanded, the treatment need not be identical,
7 but you have to have treatment that is equivalent to the
8 most favorable treatment. That's the test.

9 We talked a little bit about this in
11:44:56 10 paragraphs 26 to 29 of Riverside's Response to the US
11 Non-Disputing Party submission and there we've talked a
12 little bit about the jurisprudence on national
13 treatment. The burden of proof has a shift in it. Once
14 likeness is demonstrated, then the different treatment -
11:45:14 15 sorry, let me try this again.

16 Once you establish likeness, and there is
17 a difference of treatment, the burden shifts to the
18 other side to prove that the completely different
19 treatment is not less favorable.

11:45:30 20 Nicaragua must comprehensively demonstrate
21 that any difference in treatment between INAGROSA and
22 others in Nicaragua at that time are justified by
23 objective regulatory considerations. And Nicaragua has
24 completely and utterly failed to meet this burden.

11:45:49 25 Now, the US, in its Non-Disputing Party

11:45:52 1 submission, suggested that there's a requirement to show
2 explicit nationality-based discrimination. And that's
3 also actually not correct. The text of CAFTA clearly
4 states that there's a need to demonstrate diversity of
11:46:04 5 nationality, but you don't need to establish an intent
6 for discrimination. Intentional discrimination, if it's
7 picked up anywhere, it is picked up in article 10.5, so
8 breach of fair and equitable treatment, but not
9 necessarily in terms of the question of national
11:46:21 10 treatment and we put in detail case law to be able to
11 discuss this and to deal with that you see, in
12 particular, paragraphs 8 to 24 of the Non-Disputing
13 Party submission.

14 But just in summary, there is no
11:46:34 15 requirement to prove intent of nationality-based
16 discrimination. Certainly national treatment is
17 violated by nationality-based discrimination but the
18 intent is not required.

19 So at the same time as the occupation, the
11:46:47 20 National Police proactively initiate investigations and
21 took active steps towards evicting illegal occupiers in
22 as many as 14 separate locations across the country and
23 all of these were with respect to persons that were
24 local. So we can establish -- we've put in materials
11:47:08 25 that can establish that they were local. We can

11:47:10 1 establish the nationality. Therefore, you can establish
2 a breach of national treatment per se. The diversity of
3 nationality is the test that we need to be able to look
4 to.

11:47:22 5 Now, Nicaragua attempts to distinguish
6 this more favorable treatment by suggesting that this
7 treatment occurred in other parts of the country. But
8 the national treatment obligation is based on a national
9 basis. It is national treatment, it is not regional
10 treatment. Riverside was entitled to treatment as
11 favorable as that received by anyone else in Nicaragua.

11:47:36 12 Again the National Police force is a
13 national body, even under its own rules and its own
14 laws. So we don't look to the best treatment in a
15 specific sub spot. It's national treatment. You get
16 it for that and the entity that regulates you and the
17 law makes it clear it's a national regulator. This is
18 clearly illustrated, by the way, in Reply Memorial
19 Chart G, page 368 of the Memorial, and Chart H at 369.

11:48:05 20 We identify particularly all the national treatment
21 violations. I'm not going to go through the chart.
22 It's all set out there.

23 The treatment by the police and the
24 protective services regarding physical security is
11:48:19 25 directly related to the management, conduct, and

11:48:23 1 operation of the investment and this fulfills that last
2 requirement you can see here.

3 Now, Nicaragua also argues there is an
4 unwritten public policy exception to national treatment
11:48:33 5 and in particular in their rejoinder they raised a new
6 argument, they relied on a case called *Dreyfus v. India*
7 but if you read the case, this is nothing that they're
8 saying. The *Dreyfus* Tribunal did not make this ruling
9 at all about national treatment. The Tribunal didn't
11:48:51 10 contend that there was any such public policy exception.
11 The *Dreyfus* case excerpt relied on by Nicaragua,
12 paragraph 382, was with respect to the assessment of
13 diligence for full protection and security. It had
14 nothing to do whatsoever with national treatment or MFN
11:49:08 15 treatment, as Nicaragua contends. Maybe this is one of
16 their hallucinations they were talking about when we had
17 our last procedural meeting.

18 At the end of the day, nothing replaces
19 reading the case and this time they didn't read it and
11:49:21 20 it certainly doesn't say that and it doesn't contend in
21 any event because there is no such thing.

22 Now, we need to talk about their
23 contention of a reservation. In their newest pleading
24 they submitted a new defense that there is a reservation
11:49:40 25 under the CAFTA that says that national treatment

11:49:43 1 doesn't apply.

2 Now first of all, let's just talk a little
3 bit about some principles. So the first principle here
4 is the actor *incumbit* principle. So Nicaragua has the
11:49:55 5 burden of proof to substantiate its defense. It's
6 raising the exception and reservation. It has the
7 burden to meet that.

8 So CAFTA article 10.6 allows for the
9 making of reservations to specific reservations in the
11:50:12 10 treaty and the scope rules of 10.6 are restrictive and
11 the reservations can only apply to existing measures
12 inconsistent with the CAFTA.

13 So in order to be able to bring a
14 reservation you have to have an existing measure and it
11:50:28 15 has to be inconsistent with the CAFTA. So Nicaragua
16 says the Annex II-NI-6 -- I'll call it the reservation 6
17 to make it easier -- the reservation 6 applies to three
18 obligations of the CAFTA: national treatment, MFN
19 treatment and full protection and security with respect
11:50:52 20 to law enforcement. That's the contention.

21 Now, by claiming the reservation applies,
22 first of all, Nicaragua admits that its measures violate
23 the CAFTA. You can't have a CAFTA reservation apply
24 unless you admit non-conformity. That's the first
11:51:11 25 interpretive thing here. This is an admission that

11:51:15 1 Nicaragua has taken treaty inconsistent actions, and
2 they say that they've taken them against articles 10.3,
3 10.4 and 10.5.

4 So even if the reservation doesn't have
11:51:27 5 the meaning that they say it does, and I'll show you in
6 a minute it doesn't, the admission by invoking this
7 reservation constitutes an admission of multiple CAFTA
8 violations on the part of the legal team of Nicaragua.
9 We want to stress that right off the bat.

11:51:45 10 Second, the sectoral reservation -- we
11 need to look at the details of the reservation. I think
12 we need to pull it up. Can we pull up slide 31, please?

13 So the first thing is that when we look at
14 the reservation, you'll see that the reservation -- the
11:52:04 15 first thing is you'll see there's a sector. So all the
16 reservations, there's a taxonomy in the way that we deal
17 with this. So the sector that's relevant here is the
18 social services sector. As you see, it goes
19 obligations, the obligations can deal with chapter 10
11:52:22 20 which is about investment, and Chapter 11 which deals
21 with cross-border services.

22 You'll see that in the first part in the
23 services sector that the first piece that we need to
24 look at is the issue of a sector and then we go from
11:52:39 25 there.

11:52:39 1 What's the purpose of a reservation? A
2 reservation such as this, first of all, it's designed to
3 address competition between the government and the
4 private sector. This reservation addresses the
11:52:48 5 situation where a private enterprise invests in
6 commercial police services within the social services
7 sector.

8 So it's dealing with government
9 competition and it's in a specific sector being social
11:53:03 10 services. Within this reservation an investor can't
11 expect to receive the same market access, for example,
12 or the same treatment from the government as they
13 provide with the private sector.

14 Riverside didn't invest in the covered law
11:53:18 15 enforcement sector within the overall sector of social
16 services. That's not what this is about.

17 Second, the reservation, whatever its
18 meaning, doesn't apply to the legal provisions
19 fundamental to many aspects of this claim. If you look
11:53:35 20 at the obligation concerned, Nicaragua says that this
21 applies to, for example, full protection and security.
22 That's article 10.5. It's not in this list. How could
23 it apply to full protection and security? It's not
24 here. They didn't read it. They just wished it. But
11:53:57 25 it's not there. It's not possible.

11:53:59 1 Because article 10.5, fair and equitable
2 treatment and full protection and security, allows for
3 no reservations, as does expropriation. There are no
4 reservations to those fundamental principles. The CAFTA
11:54:12 5 came from the NAFTA -- I wrote a couple books on the
6 NAFTA, I wrote a chapter on reservations, it happens to
7 be one of my favorite topics. I'm afraid I'm going to
8 take you through a little more because reservation
9 construction is a particularly important thing and they
11:54:25 10 have got it so very, very wrong today.

11 Now we need to deal with the sector, the
12 sector, because the annex reservation does not cover the
13 circumstances that they say it covers. So we have to
14 look at the word social services. Now, Riverside has
11:54:47 15 identified examples in the submission to the US
16 government. We were able to talk about some of this
17 because it was relevant in there. Remember, this came
18 after -- in their last pleading. We never saw this so
19 we could otherwise not plead any material normally. We
11:55:02 20 were able to get something in relation to the
21 Non-Disputing Party submission, and we were able to
22 identify where the meaning of social services come from.
23 It's not defined here.

24 But Canada, in a virtually identical
11:55:16 25 reservation in the NAFTA, NAFTA article 2C5 reservation,

11:55:22 1 I believe it is, Canada did not include police or
2 protective services in its description of the social
3 services sector. So word for word, same reservation, no
4 description of police being the social services.

11:55:38 5 Furthermore, if we look at international
6 law instruments from the UN or the WTO, we can look at
7 the scope of the social services chapter. Police is not
8 in there. But we can look to the UN Central Product
9 Classification Schedule -- and we put that again into
11:55:55 10 the Non-Disputing Party submission -- and it classifies
11 police and fire protection services in the sectoral
12 classification with diplomatic services.

13 Those are not social services. It's
14 another class. It's another thing. Diplomatic service
11:56:13 15 isn't a social service. Law enforcement service for
16 social services is a particular and limited area. The
17 CAFTA would cover more favorable treatment that could be
18 provided by a state that would compete with the private
19 sector security services for private prisons, for
11:56:32 20 private law enforcement. That's the objective of the
21 reservation.

22 Law enforcement would be covered for
23 things, you know, in that way. But let's say law
24 enforcement in relation to investment regulation or
11:56:44 25 banking fraud or criminal law on that way or general

11:56:48 1 public safety. That is not within the narrow rubric of
2 social services. That is other sectors. So for example
3 if it's an investment regulation it might be financial
4 service sector. And there are other sectors.

11:57:01 5 Furthermore, Nicaragua knew how to reserve
6 more broadly, if that was their intention, in other
7 reservations. This is deliberately narrow.

8 Let's look at another reservation that's
9 not. If we look at the next slide, whatever that is, we
11:57:18 10 see here reservation Nicaragua N1. See how they used
11 all sectors? So their position would make even more
12 sense potentially if they had done all sectors. But
13 they didn't. They reserved to social services. So they
14 have to prove it fits within social services, which it
11:57:38 15 can't. It suggests an opportunity. I call this
16 hopium - something that you can put in a pipe and try to
17 smoke. It is just not something that makes any sense.
18 At the end of the day this does not fit in to the
19 reservation.

11:57:59 20 Nicaragua could have made sweeping
21 reservations for all sectors but it chose not to. It
22 knew how to, but it didn't. Nicaragua has the burden of
23 proof of showing that this reservation applies, and it
24 can't do that. The measures in question in this
11:58:14 25 arbitration pertain to public security, not law

11:58:16 1 enforcement provided as a social service.
2 Nicaragua is trying to put a square peg in
3 a round hole that just doesn't fit. But as I noted
4 earlier, Nicaragua's admission by applying this is an
11:58:30 5 admission of non-conformity with three NAFTA
6 obligations. So they have now admitted that they have
7 violated national treatment. They have admitted that
8 they have violated most-favored nation treatment. They
9 admitted they violated full protection and security.
11:58:49 10 And this reservation doesn't fit. The shoe doesn't fit.
11 Or as they said in the OJ Simpson trial, "if the glove
12 doesn't fit, you must acquit."
13 The glove doesn't fit. It doesn't work.
14 It doesn't apply.
11:59:00 15 Now, let's turn to MFN.
16 PRESIDENT: Mr. Appleton, can you slow
17 down a bit?
18 MR. APPLETON: Not unless you give me more
19 time. I'll do my best.
11:59:15 20 PRESIDENT: Just make sure that the court
21 reporters can follow --
22 MR. APPLETON: I understand. I'll do my
23 best. I can get a little worked up, especially if you
24 ask me about one of my favorite topics which happens to
11:59:21 25 be reservations. I'm going to go to the MFN. It's less

11:59:26

1 favored.

2 So slide 33 sets out the text of the MFN
3 obligation. You see the MFN obligation is very similar
4 to the national treatment obligation. Here the

11:59:37

5 comparator is not a better treated local or a better
6 treated non-local, so somebody who's either not a treaty
7 party or someone who is a party from the CAFTA, but not
8 local. That's the difference of national treatment and
9 MFN treatment. Otherwise, the tests are very similar.

12:00:00

10 And here we have situations that are profoundly focused
11 about substantive MFN that we're going to talk about.

12 The first one, by the way, is that if you
13 recall from the chart we mentioned, a company called
14 Nela Inversiones, Nela is owned by a Costa Rican

12:00:21

15 company, so the fact they get better treatment is an MFN
16 violation rather than a national treatment violation
17 because of the CAFTA structure that they would be MFN
18 but not local. So we looked at MFN substantively rather
19 than national treatment. Same test. Same approach.

12:00:36

20 The police gave better treatment to Nela. Nela happens
21 to be owned by a Costa Rican. So we apply MFN there
22 rather than applying national treatment. That's our
23 first piece on that, and we identify that in the
24 pleadings but we just wanted to make sure that that was

12:00:53

25 clear.

12:00:54 1 Second, we need to examine MFN treatment
2 in relation to protective security extended to
3 investments of non Nicaraguans who faced unlawful
4 occupations. And that is, by the way -- to go back on
12:01:12 5 that -- the exhibit is C-454 -- is the proof that Nela
6 is a Costa Rican entity or owned by Costa Ricans and
7 that is discussed in Reply Memorial 1702. That's the
8 first piece.

9 We'll talk about MFN and better treatment
12:01:34 10 in another context and that is the issue of the Russian
11 treaty. Now, the crux of Riverside's MFN argument here
12 is on more favorable treatment that is provided under
13 the treaty between Nicaragua and Russia. This --

14 PRESIDENT: Just to go back to your
12:01:56 15 comparator, you are saying that for the purposes of the
16 MFN, the relevant comparator is the other occupied
17 properties. Why would it not be also for national
18 treatment? What is the basis for distinguishing?

19 MR. APPLETON: I'll take you through that.
12:02:12 20 So for Nela, it's other occupied properties. I'm going
21 to come directly to it because I'm going to show you
22 exactly the comparison, exactly the treatment and
23 exactly the same test for the Russian treaty. But you
24 want me to answer for Nela as well?

12:02:26 25 PRESIDENT: My question was more about why

12:02:28 1 are you making a distinction or establishing your
2 argument on a different comparator for the purposes of
3 the MFN treatment obligation and the national treatment
4 obligation? For the national treatment obligation you
12:02:44 5 said that everybody in Nicaragua is the appropriate
6 comparator, whereas for the purposes of the MFN you say
7 that it is the other occupied properties. Why would it
8 not be occupied properties for purposes of both
9 obligations?

12:03:03 10 MR. APPLETON: Yes. So let me be very
11 precise. With respect to -- there's two different MFN
12 arguments that we have to deal with in different
13 contexts for different regulatory circumstances.

14 So with respect to the better police
12:03:19 15 treatment, both for MFN and national treatment you're
16 dealing with obligations of general obligations, general
17 availability.

18 So anybody in Nicaragua is entitled to
19 that, so in fact it doesn't have to be -- it doesn't
12:03:36 20 have to be other properties that are invaded. It's
21 anybody that has property.

22 So for national treatment, while we have
23 to still show diversity of nationality to be able to
24 meet either of these tests, so for national treatment
12:03:52 25 the appropriate diversity it has to be between a

12:03:57 1 Nicaraguan and the American investor.

2 For MFN treatment, it has to be between
3 the American investor and somebody who is from a
4 non-treaty party or another CAFTA party. That's where
12:04:16 5 MFN kicks in. MFN for CAFTA would apply to another
6 treaty party, like Costa Rica, or a non-treaty party as
7 I'll get to in a minute like Russia. That's the
8 difference.

9 For likeness, they would be the same. So
12:04:31 10 the basis for likeness for national treatment is
11 everybody because of the police law. The basis for
12 likeness in fact for Inversiones Nela and MFN is
13 everybody as well because that's the law.

14 We look to the regulatory situation to
12:04:45 15 help us deal with it. We look to the measure. The
16 measure is the language they use in the CAFTA and the
17 definition of measure is going to be important and it's
18 exactly what I'm going to get us to when we want to talk
19 about the Russian treaty as well. But your comparison
12:05:01 20 is about the regulatory basis that we're looking at for
21 the treatments. That's what we're going to look at.
22 That's going to be relevant. That's the context. In
23 essence, who's competing for government treatment, so to
24 speak.

12:05:16 25 So for the Russian treaty, here our

12:05:19 1 situation is a little bit different. Okay? So, first
2 of all, I have to identify that in the first pleading
3 from Nicaragua they did not defend at all against the
4 application of MFN in the Russia treaty. They say in
12:05:36 5 paragraph 325, they dismiss the relevance of the Russian
6 treaty, but they didn't dismiss the application of the
7 Russian treaty. They just said everything is
8 irrelevant, we think the obligations are the same,
9 there's not going to be any difference, but they didn't
12:05:53 10 dismiss the application. We say first of all the
11 principle of estoppel is that's a legal position.
12 They've now raised a totally different defense to the
13 opposition of what they said earlier and that is
14 something you can't do.

12:06:06 15 You can't say "we concede this point" and
16 then say later "oh, we've now changed our mind and now
17 we're going to file a new defense" after everybody has
18 filed everything. We think that's profoundly improper
19 and unfair. But we're going to address their argument
12:06:22 20 anyways. We're going to say principles of estoppel and
21 agency apply and they're not entitled to do that.

22 But now they argue that the Annex II,
23 social service reservation, means that MFN is
24 inapplicable. As we've already talked about that, and
12:06:39 25 it doesn't apply to that. It doesn't apply because the

12:06:43 1 issue that they say is about police services, that's the
2 only application of the Annex II reservation and the
3 annex II reservation wouldn't apply to the Russian
4 treaty, and even if it did, it's not social service. So
12:06:57 5 that doesn't work. None of it works, but they just
6 say -- it's like a general carve out of everything. We
7 can do anything. We can wave the flag and we don't have
8 to do anything. That is just illogical. It cannot
9 work.

12:07:10 10 But it's our obligation to show you why
11 MFN works for the Russian treaty and I'm going to take
12 you through that now.

13 So Riverside can first show the issue of
14 likeness. That's our first piece. So Riverside's
12:07:25 15 investments are like investments of Russian investors
16 owned in Nicaragua.

17 So the evidence of the Russian investors
18 operating in Nicaragua is shown specifically in the
19 pleadings, and you'll see that. We've referenced three
12:07:46 20 in particular, and it's confirmed by very prominent
21 members of the Nicaraguan government, very prominent
22 members of the Russian government because Russia is the
23 principal ally of Nicaragua, so it's very prominent that
24 there are meetings of high-level ministers back and
12:08:05 25 forth and they celebrate these investments.

12:08:08 1 So can we just turn to slide 34? That,
2 you'll see that there are three investments that are
3 operating and at each place we've identified the proof
4 and the information that goes with it and they are the
12:08:22 5 Mechnikov Institute, Yota, which is a telecommunications
6 entity, and Gecko, which deals with international
7 investment trade and distribution of various goods with
8 the offices and things, including e-bikes and lubricants
9 and various things like that.

12:08:43 10 This is all set out in paragraphs 41 to 45
11 of the Non-Disputing Party's submission and we've
12 expressly provided this evidence. These investors were
13 operational before 2018. Again, let's just point out,
14 the treaty with Russia was done in 2013 after the CAFTA
12:08:57 15 was negotiated. So you have treatment that if it's more
16 favourable -- we will show you it's significantly more
17 favorable -- that is done after the earlier treaty, and
18 so MFN means that that treatment would automatically be
19 provided to investors who were in like circumstances
12:09:18 20 under the CAFTA. It's the best customer rule. They get
21 to follow along.

22 So we've established that there are
23 investors. Now let's establish that there's a measure,
24 that there's something that has effect.

12:09:30 25 So, first of all, under the law of

12:09:33 1 Nicaragua that foundationally treaties are -- if they
2 are passed by the national legislature, which this one
3 was and we've identified where that is, then in fact
4 they become a measure, a law of the State, applicable in
12:09:51 5 recourse, and that is exactly what happened here, that
6 the constitution of Nicaragua says that if the national
7 legislature, National Legislative Assembly, gives its
8 approval, they are given constitutional force and they
9 chose that route to do this.

12:10:07 10 And under the definition of measure inside
11 the CAFTA, that makes the submissions on law,
12 regulation -- okay -- and therefore that is an act of a
13 state that is actively providing treatment.

14 In addition -- so you have the treaty
12:10:25 15 itself, and there's some argument by the treaties
16 themselves on their own provide treatment, but here the
17 State has taken legislative effect to create it and
18 under the definition of the measure, which is the
19 requirement we look for in the CAFTA, you need fact
12:10:40 20 test.

21 So that's particularly significant because
22 here you have a situation where the law says that the
23 Russians get this better treatment and the Americans are
24 entitled to receive that same treatment. That is the
12:10:54 25 basis if you have more favorable treatment -- I will

12:10:58 1 show you the more favorable treatment -- we'll talk
2 about some of here and we will talk about it as we go
3 along in some of these other provisions so we can be
4 very clear and very focused.

12:11:11 5 So -- and by the way, the definition of
6 the measure, that's CAFTA article 2.1, just so that
7 we're very clear so you can look that up as we go
8 through.

9 The obligations at issue here are what is
12:11:23 10 more favorable? So we've already identified that
11 there's a broader definition of investment, there's more
12 favorable treatment with respect to fair and equitable
13 treatments, full protection and security and national
14 treatment and there are enhanced expropriation
12:11:42 15 protections. That's in our pleadings.

16 As we're going to talk about in a minute,
17 there's some more that have arisen, including new
18 arguments raised by the Republic of Nicaragua that they
19 hadn't raised earlier, so we couldn't embrace them in
12:11:54 20 our Reply Memorial also that we'll deal with the better
21 treatment from the Russian treaty.

22 So the provisions in the Russian treaty
23 surpass those in the CAFTA and they provide more
24 favorable treatment to Americans who are also investing
12:12:16 25 at the same time in Nicaragua. So they're like to those

12:12:18 1 who are investing in Nicaragua from the Russian
2 Federation.

3 There is treatment provided by the treaty
4 itself, treatment that's provided by the law of
12:12:29 5 Nicaragua and if that treatment surpasses the treatment
6 under the CAFTA, under MFN and the CAFTA, they're
7 entitled to that treatment and there are very specific
8 impacts of that treatment. We're about to take you
9 through a very important one in a moment. Just in case
12:12:48 10 you wanted to ask a question -- I wasn't sure if you had
11 one. Okay.

12 Then I'm going to turn to something that's
13 become relatively significant lately because of some
14 procedural discussions in the last few days and I
12:13:00 15 thought maybe we might talk about that and look at that
16 and that is the essential security interest clause.

17 So article 21.2 of the CAFTA contains an
18 essential security interest clause and an essential
19 security interest clause is a non-precluded measure.
12:13:20 20 According to Nicaragua it's a complete defense against
21 claims of wrongdoing. It's not. That's not what it
22 means.

23 What Nicaragua asserts in a response to
24 the illegal invasion and occupation of Hacienda Santa Fé
12:13:33 25 and they say that all of this is solely within its

12:13:36 1 purview and its determination under article 21.2(b). So
2 we're going to talk a little bit about this. Okay?

3 Now, first of all, there's absolutely no
4 evidence to support the assertion that the Nicaraguan
12:13:51 5 authorities, in refusing police protection to the
6 investor and INAGROSA, were genuinely exercising a
7 mandate to protect the country's essential security
8 interests. You can see from those charts -- C1, C2 and
9 C3 -- it was common practice for the police to evict
12:14:10 10 invaders of commercial property or to consider evicting
11 invaders of commercial property even in areas
12 experiencing civil disturbance. Thus, Nicaragua didn't
13 act within a policy of not evicting invaders. That
14 wasn't part of their policy.

12:14:25 15 Actual good faith and reasonableness must
16 be demonstrated to have existed at the time of the
17 conduct. Nicaragua admits that you have to have good
18 faith in its invocation.

19 This is not an objective or hypothetical
12:14:41 20 standard whether the conduct could in principle be
21 justified as good faith for essential security
22 interests. This must be the motivation of the actual
23 conduct when it occurs as shown by the evidence and
24 Nicaragua has this burden.

12:14:56 25 Nicaragua failed to provide any decrees,

12:14:59 1 guidelines, protocols or other orders from the
2 president, defense or interior ministry or other
3 responsible officials that would indicate a good faith
4 belief that police inaction in securing the INAGROSA
12:15:12 5 property was necessary to protect essential security
6 interests.

7 Furthermore, no written internal police
8 orders or guidance have been produced. Nicaragua claims
9 the existence of some form of high-level guidance but
12:15:30 10 presents no evidence to substantiate the claim or to
11 detail its content. And in the absence of express
12 orders, the Tribunal cannot conclude that Nicaragua's
13 decision to withhold police protection was based on a
14 genuine belief that providing such protection would
12:15:46 15 undermine the country's essential security interests.

16 Remember, the words of the treaty don't
17 refer to security in general, but "essential security."
18 This is a higher threshold for the indication of good
19 faith, and they admit that you have to look to good
12:16:02 20 faith. You have to look to the words of the treaty. To
21 this end, again Nicaragua has filed no evidence of
22 assessments of risk. What would we look for? Documents
23 from the interior ministry, the army, the Ministry of
24 Defense, the National Attorney General, the National
12:16:21 25 Police chief. This would be the types of evidence a

12:16:27 1 tribunal would expect to see that justify the indication
2 of essential security relevant at that time for that
3 particular measure.

4 We are talking about the issues at
12:16:40 5 Hacienda Santa Fé. In essence, they have to show you
6 that there's an essential security interest related to
7 avocados or guacamole production or something in some
8 way, in that particular way, with evidence at that time
9 that's produced and they've been asked to produce this
12:16:56 10 type of evidence and they haven't done any because they
11 don't have any.

12 And there's nothing. They just say "trust
13 us." And here again, we need to return to the operation
14 of that *nullus commodum* principle. A state can't rely
12:17:10 15 on its own wrongful acts to justify other acts.

16 Nicaragua can't use state-directed and sponsored
17 violence against its own citizens who are peacefully
18 having their protests and rely on its lawlessness to
19 invoke essential security interests. That's exactly
12:17:29 20 what's not allowed. That's an abuse of process as a
21 breach good faith. It would create a perverse outcome.
22 That would render all of this treaty to have no impact,
23 no meaning. That is exactly what we're not allowed to
24 do under the Vienna Convention.

12:17:47 25 In fact, not only does Nicaragua admit

12:17:50 1 that it has to be done in good faith, but so does their
2 expert, Professor Burke-White, in paragraph 35 of his
3 expert report. That's RER-06. But Nicaragua's use of
4 Article 21.2 is simply an example of an abuse of rights.

12:18:06 5 And I point out that in the expert
6 testimony of Professor Wolfe, he identified that the
7 Tribunal should not give a margin of appreciation to
8 Nicaragua's discretionary acts specifically because
9 they've been so abusive of the process. They have done
10 so many things that have been misleading and unfair.

12:18:24 11 They have told so many untruths, they cannot be trusted.

12 It's unbelievably rare for someone to say
13 for a government you cannot give full faith and credit
14 to what they do, but here expert after expert after
15 expert for international bodies have said you cannot
16 believe them, they are not telling you the truth and in
17 this Tribunal to this case they have not told you the
18 truth. We have seen that and we have already identified
19 it and we'll show you more.

12:18:55 20 So here Nicaragua hasn't conducted itself
21 in good faith in its explanation and its justification
22 of the events. Let's look at what they said.

23 Before we go there, if the Tribunal were
24 to accept Nicaragua's position, the Tribunal would be
12:19:10 25 alone as the only international adjudicative body to

12:19:14 1 accept and condone Nicaragua's excuses about the
2 situation in 2018. Every other body that has
3 investigated this has come to a different position. If
4 you were to grant essential security interests because
12:19:29 5 of their conduct, you would be the only one in the world
6 that would be -- you would stand completely in
7 opposition to all the findings and facts from the UN,
8 from the OAS -- remember, Nicaragua refused to let the
9 inspectors in later and withdrew from the OAS so there
12:19:47 10 wouldn't be more investigation -- from all of the
11 governments that have put sanctions on.

12 You're entitled -- you can make your own
13 finding of fact. I simply say that there is an
14 overwhelming preponderance, almost a *jurisprudence*
12:19:59 15 *constante* here and that you would stand alone in making
16 the finding different from everyone else. And they may
17 ask you to do that, but I don't see any basis for it and
18 it would be very troubling.

19 So even if Nicaragua acted in good
12:20:22 20 faith -- let's say they could even do that -- and
21 reasonably believed its actions were necessary, the
22 exception does not entirely absolve Nicaragua from
23 responsibility for material injury. Nothing in the
24 provision of essential security displaces article 27(b)
12:20:39 25 of the International Law Commission Articles on State

12:20:42 1 Responsibility. And so consequently compensation for
2 the loss and damage to physical property is not
3 precluded, even if Nicaragua could legitimately invoke
4 the security exception. We could talk about this in the
12:20:56 5 closing. It's an interesting and quite complicated
6 issue. But their responsibility for loss or damage
7 persists even when the State engages in legitimate
8 police actions to address civil disturbances.

9 Finally, Riverside contends that the
12:21:14 10 Most-Favored-Nation obligation under CAFTA article 10.4
11 is applicable and highly useful here because Nicaragua
12 has extended preferential treatment under the Russian
13 treaty, and the Russian Treaty -- we identified this
14 argument in paragraphs 1202 to 1210 of our Reply
12:21:37 15 Memorial. The Russian treaty does not contain any
16 exceptions for essential security and therefore national
17 treatment or MFN or fair and equitable treatment or full
18 protection and security offered under the Russian treaty
19 is a broader obligation. Not only is it autonomous and
12:21:57 20 not limited by interpretations, as they are in the
21 CAFTA, but it's a broader obligation that has no
22 carve-out for essential security interests.

23 PRESIDENT: May I just clarify your
24 position on the legal nature of the national security
12:22:15 25 exception?

12:22:15 1 What is it, in the Claimant's view? Is it
2 an objection to jurisdiction or admissibility, or is it
3 a defense on the merits, or is it something else?

4 MR. APPLETON: Well, let's walk through
12:22:28 5 it.

6 It was not an objection to jurisdiction.
7 They didn't raise it in their jurisdiction and they've
8 admitted there are no jurisdictional challenges. So I
9 had invited them to do this over a year ago, but they
12:22:42 10 finally have admitted in the Rejoinder they have no
11 jurisdictional challenges, so it can't be that.

12 With respect to admissibility, nobody has
13 ever ruled on it as an admissibility issue per se, and
14 if we were to use the general rules of admissibility we
12:22:59 15 would have to look at their back conduct and the issues
16 that go with it, so I would imagine they're probably not
17 raising it in that way because it wouldn't be
18 successful. And good faith would kick in here as well,
19 so it's not that.

12:23:14 20 So it has to be, I imagine, some type of a
21 defense on the merits would be my sense. It's not well
22 articulated here in terms of that, but what they have
23 done is wave a big flag of ESI but not think about the
24 meaning and prove the piece that goes with it.

12:23:35 25 So here, since the Russian treaty has

12:23:37 1 nothing in it, and I would say its merits are
2 substantive, that you'd be getting a less complete, a
3 less favorable obligation, for example, full protection
4 and security. Full protection and security with
12:23:50 5 essential security is less favorable than without. So
6 that's got to be merits in the way I would look at it.
7 PRESIDENT: So your position is
8 effectively that you can invoke the MFN clause to
9 exclude the national security exception under the CAFTA?
12:24:14 10 MR. APPLETON: Yes.
11 PRESIDENT: I just wanted to understand
12 your position.
13 MR. APPLETON: Yes, and the reason is
14 fundamentally that it goes to substantive MFN and not
12:24:24 15 only does it go to the substantive MFN, but what does
16 that look like? If you have the Russian treaty instead
17 of having this obligation under the CAFTA, then
18 basically what you get is the -- is that -- in essence
19 the CAFTA, essential security interest provision is like
12:24:44 20 a *lex specialis*, so it would just not apply because it's
21 not there in the Russian treaty and so the general
22 principles of international law, like article 25 of the
23 ILC Articles on Necessity would apply. They'd have to
24 meet the necessity test, which they can't meet because
12:25:02 25 they've caused it and because it's so burdensome.

12:25:06 1 But at the end of the day, that's the
2 burden. That's what they have to do. And this is all
3 part of the substantive international law before this
4 Tribunal. So even if the Tribunal determines MFN clause
12:25:19 5 applies, basically -- sorry. If it does, it obviates
6 the need to address the central security in this case
7 because MFN would say that in this particular
8 circumstance because of a particular treaty in the
9 particular way that they've done, factually it no longer
12:25:37 10 applies, so you don't actually have to rule on ESI,
11 essential security interests, because MFN answers that
12 question.

13 Again, they could have raised all of this
14 earlier. They didn't. They said essential security but
12:25:53 15 they didn't put any of these issues in and you've heard
16 our objections about this, but we're able to identify
17 and discuss what our general view is. We wanted to make
18 sure that we were as clear as possible.

19 So I'm going to turn briefly to fair and
12:26:09 20 equitable treatment. I'm just going to ask the
21 secretary what are we on time, so you can help me for a
22 moment so I can judge?

23 MS. CONOVER: You have used two hours 20
24 minutes so far.

12:26:26 25 MR. APPLETON: So 40 minutes. Fabulous.

12:26:28 1 No problem at all, just on time. But I'll keep the same
2 pace, I'm afraid, Mr. President, I'm sorry.

3 So let's talk about fair and equitable
4 treatment. Fair and equitable treatment is CAFTA
12:26:39 5 article 10.5, and it requires Nicaragua to accord
6 international law standards of treatment to investments
7 of investors of CAFTA parties.

8 Let's go look at slide 35. It looks very
9 simple. And, in fact, as the president has done a NAFTA
12:26:53 10 case, it looks the same as the NAFTA. The difference is
11 that they put the word "customary international law"
12 here rather than they have in the NAFTA and they have
13 some interpretive context in the CAFTA that's not in the
14 NAFTA. The difference here is that under the CAFTA
12:27:13 15 obligation we have a more constrained international law
16 obligation than if we have international law without the
17 word "customary", which is what we would have in the
18 Russian treaty.

19 So we don't deal with the interpretive
12:27:24 20 annexes. We have what we call the autonomous principle
21 of international law which looks at our sources of
22 international law under the statute of the International
23 Court of Justice we looked at before. One of the
24 members of the Tribunal I'm sure knows more about this
12:27:43 25 than anybody ever.

12:27:45 1 So as a result we get all four of those
2 sources of international law rather than just one.
3 Seems to me that having four sources of international
4 law is significantly more favorable than having one.

12:27:59 5 Having the one, the customary, that's then further
6 limited by an interpretive annex is even less favorable.
7 So, fundamentally, our argument is that if
8 the Russian treaty doesn't do that, you get a more
9 favorable substantive obligation under the Russian
10 treaty than you do under the CAFTA because simply it's
11 unburdened by these restrictions. That's more
12 favorable.

12:28:14 13 But Nicaragua's actions were inconsistent
14 with the obligation of state interference with private
15 property. It failed to observe due process. It had an
16 application of arbitrary treatment and an abuse of
17 rights. All of these are going to fit in here.

12:28:32 18 So Nicaraguan law expert,
19 Renaldy Gutiérrez, in his report, that's CES-06,
20 confirmed that Nicaragua engaged in abuse of rights
21 regarding the legal proceedings taken during this
22 arbitration. I simply want to identify the Tribunal's
23 already made a key finding here on this very issue.

12:28:50 24 If you recall, there was an order that was
25 made in the courts of Nicaragua. We're going to talk a

12:29:07

12:29:10 1 lot about that over the course of this hearing, I don't
2 want to get into that too much, but if you recall, there
3 was an order, it was not served on Riverside, they were
4 named as a party. The order was taken -- and the terms
12:29:25 5 of the order required that the order be then served
6 again to them afterwards and it wasn't.

7 There were issues about how that process
8 went. There are questions about whether or not the
9 materials that were put in the court record were
12:29:39 10 accurate or fair. There was no right of opposition
11 since INAGROSA never saw it. They were never named on
12 it even though they owned the property. And Riverside
13 never got it. They were never served ever in any way.
14 So they couldn't oppose the fact that they relied on
12:29:57 15 materials that Riverside say were false. They say there
16 was fabricated evidence that went into that. They could
17 never see that.

18 That's very troubling, especially in the
19 context of all the expert evidence that we've seen about
12:30:07 20 the inadequacies of the legal system in Nicaragua,
21 including those conferred by Paul Reichler in his own
22 letter. Their lawyer confirmed the inadequacies of
23 their own system, yet they want to rely on that again
24 and again. You're going to hear a lot about that when
12:30:22 25 they get a chance to give their opening. But we know

12:30:25 1 that you can't trust that because their courts aren't
2 fair. Their process isn't fair. Don't listen to me.
3 Don't listen to my expert. Listen to their lawyer,
4 Paul Reichler. He's a decent man. He knew exactly.

12:30:36 5 That's why he couldn't act in this case. He wouldn't
6 act for dictators who were abusing human rights. That's
7 why.

8 So let's look at what this Tribunal said
9 already. Slide 37. This is Procedural Order 4. You
12:30:52 10 identified already that not serving the order on
11 Riverside after it was taken was not in accordance with
12 due process.

13 Of course that's a violation of article
14 10.5 of CAFTA already. Remember, they brought that --
12:31:07 15 they brought it against Riverside because they said
16 there's a case that's going on and they brought it to
17 the international tribunal so they went to court, didn't
18 tell us. We had sessions in front of you. They didn't
19 tell you. They didn't tell us. We discovered this
12:31:21 20 after we filed our Memorial? We don't know anything
21 about it? We find out by accident? That's bad
22 practice. That's not nice. We'll deal with that again
23 when we deal with costs, but it also goes to the issue
24 of good faith and the issues that are here.

12:31:40 25 So we obviously had concerns about the

12:31:43 1 abuse of process by the Office of the Attorney General
2 and that was confirmed in the course of Nicaragua being
3 independent. We've talked about that. So I'm not going
4 to belabor that. We've talked a little bit about this
12:31:58 5 process. Let's just really hone in a little bit here.
6 Okay?

7 So, first of all, the Attorney General
8 interposed itself in the operation of the protective
9 order. They sought the protective order, they brought
12:32:14 10 the protective order and it had Nicaragua appointed as
11 the independent protected trustee over the land of
12 Hacienda Santa Fé.

13 Now, if we look at the witness statement
14 of Renaldy Gutiérrez, he says this is an abuse of
12:32:27 15 process. He opines that Nicaragua failed to protect the
16 interests of Riverside and INAGROSA through the
17 emplacement of the protective order. Why?

18 Because the purpose of the protective
19 order is to protect the interests of the victim, the
12:32:42 20 beneficiary. That's INAGROSA and Riverside. They're
21 the rightful owner of the lands. So the trustee should
22 act as a fiduciary. But here we see the goal of the
23 protective order was to protect Nicaragua and constrain
24 Riverside.

12:32:58 25 Just think about it. The Attorney General

12:33:01 1 appoints itself -- because it's the legal officer of the
2 State, it appoints itself as a trustee but it's an
3 active litigant in the case. Why -- it has an interest
4 opposed to that of Riverside, opposed to INAGROSA.

12:33:15 5 Who's protecting the fairness interests here?

6 They had the court waive the obligation to
7 post bonds, so if something went wrong, if something
8 happened there's no bond now because the court just did
9 whatever they asked. So there's no protection again.

12:33:31 10 How can that be fair?

11 Why did they appoint themselves? There
12 are all types of trustees that are available in
13 Nicaragua. How is it that they appointed themselves?

14 You can ask the legal experts if you like. This is a
12:33:51 15 minimal amount of due process protection, a complete
16 lack of transparency and candor in what is going on.
17 There was no protection for the fairness interests for
18 the beneficiary.

19 I already mentioned that in getting the
12:34:01 20 order the Attorney General relied on fabricated
21 evidence. We'll have an opportunity to talk about some
22 of that as we go along. It's just profoundly unjust and
23 procedurally unfair.

24 None of this can be excusable. The
12:34:19 25 deliberate actions of the Attorney General are not

12:34:22 1 understandable and they're not defensible. It was
2 profoundly antithetical to fairness or justice or the
3 rule of law. That is exactly what a violation of
4 article 10.5 of the CAFTA looks like.

12:34:29 5 Whether you're under the CAFTA or whether
6 you're under the autonomous, that is exactly the type of
7 bad behavior that is set out, prescribed and not allowed
8 to take place. And the use and abuse of process to
9 place their name on the legal title de jure. INAGROSA
12:34:51 10 had exclusive -- sorry, had exclusive possession of the
11 title. They owned 100 percent of it. They had it all.
12 What would be the basis to put the name of the Republic
13 of Nicaragua on that document? It wasn't in the order.
14 Why is it there? They did it de jure. That is the
12:35:14 15 essence of a direct taking. That is exactly what CAFTA
16 article 10.7 prohibits.

17 And then let's look for a minute about the
18 issue of permits. Nicaragua's response in this case has
19 been to throw the book, we say, at Riverside's business.
12:35:32 20 They had every regulator after regulator file witness
21 statements saying that INAGROSA could not lawfully
22 operate in Nicaragua due to regulatory infractions.

23 Remember there were six of them. We were
24 going to have to hear six more witnesses, every single
12:35:49 25 one saying the same thing. We have evidence from

12:35:52 1 Renaldy Gutiérrez, who you will hear from, who
2 identified, you know, that this was immaterial. But
3 fundamentally Nicaragua has been quick to allege *ex post*
4 *facto* regulatory infractions. They have ignored all the
12:36:07 5 administrative process. That process starts with the
6 notice of infraction. No notices of infraction.

7 The six regulators have each put a
8 statement in saying that they threatened to impose
9 unbelievably harsh regulatory sanctions if they possibly
12:36:22 10 could and they would. No hearing. No notice.

11 None of these allegations were ever
12 notified to INAGROSA during its 20 years of doing
13 business agriculturally on this land. The objective, a
14 bureaucratic storm here that's involved, is to suggest
12:36:38 15 that INAGROSA could operate legally and they did this to
16 try to reduce the damages. There's no basis for that.
17 Quite the opposite.

18 When INAGROSA had to undergo a review of
19 its practices as part of an application for the Private
12:36:52 20 Wildlife Review -- remember they applied but it never
21 came into force -- the regulators never noted any
22 noncompliance. They indicated that INAGROSA was
23 compliant with government regulations. That's exactly
24 it. You should be able to rely on that. So not only do
12:37:08 25 we have absence of notification, we have a positive

12:37:10 1 statement from the government regulator.

2 But, yet, look at all the amount of
3 effort, look at all the amount of time, look at all the
4 witness statements that they have thrown in. They could
12:37:20 5 have done it relatively easily, but they didn't because
6 they wanted to make this as complicated, throw as many
7 things to delay, to distract and to deny. The three Ds.
8 That's what's been going on, and you must not allow that
9 to take you away from what's here. I say your eye has
12:37:38 10 to be on the prize and that is to understand what's
11 going on and not be distracted by these disingenuous
12 approaches.

13 And legal expert Renaldy Gutiérrez has
14 reviewed these. He concludes that the regulatory issues
12:37:51 15 are inapplicable or, at worst, de minimis. There's no
16 material impact whatsoever on these.

17 So at worse, they are issues that if they
18 had been properly notified and INAGROSA, after a process
19 was ruled noncompliant, would result in some minimal
12:38:09 20 fines.

21 And just so we understand, it includes
22 absurd things like saying that you didn't apply for an
23 export permit for trees that you didn't cut down. Well,
24 they're not a manufactured good. They're a living tree.
12:38:23 25 You don't apply for an export permit until you have a

12:38:25 1 good. You can't apply for it. That's the basis of a
2 permit for an export. You need the good. If I saw a
3 harvested good, you can't -- you can't apply for a
4 permit for your avocado until you harvest it. You can't
12:38:37 5 apply for an export permit for a CITES tree species
6 until it's been harvested. How could that make any
7 sense? That's just unfair, unbridled regulatory
8 harassment. And that's what we have. And that is the
9 protection that CAFTA has.

12:39:00 10 And I note that the Human Rights Watch
11 World Report identified expressly in Exhibit C-0546 on
12 page 3 about how Nicaragua applied arbitrary and
13 capricious use of its regulatory system to harass those
14 seeming to be unsupportive of its government. Here they
12:39:20 15 give the example of how the government closed 17 radio
16 stations, including those run by the Catholic church,
17 over allegations of lack of operating permits. They had
18 been operating for years and years. They closed them
19 down because that's what they wanted to do. That's
12:39:32 20 exactly the meritless and unfair approach that we have.
21 Six regulators. That makes absolutely no sense.

22 So looking at due process, natural
23 justice, procedural fairness. So this is all the
24 element of abuse of rights. We talked about the
12:39:48 25 elements of abuse of rights. I'm not going to define

12:39:52 1 the key bits, but we're talking about the hindrance and
2 the enjoyment of rights, a fictitious exercise of right
3 and abuse of discretion in the exercise of governmental
4 power. Those are the hallmarks and we're seeing them

12:40:04 5 again and again and again, because you can't trust what
6 the government's telling you, not because we don't want
7 to trust them, but because we've been shown that we
8 can't trust them. That's our problem.

9 A government cannot use its power to abuse
12:40:24 10 a foreign investor by capriciously exercising
11 discretionary rights. Similarly patent abuses of
12 administrative decision-making violate the fair and
13 equitable treatment standard as do imposing unreasonable
14 regulatory burdens. This is nothing, this is the
12:40:37 15 operation of pretense of law but for capricious and
16 arbitrary purpose. That's what constitutes an abuse of
17 rights.

18 That's exactly what happened here.
19 Nicaragua has asserted a veritable holy war of policy
12:40:51 20 crackdowns and alleged infractions against INAGROSA,
21 even though Nicaragua has not filed any notice of
22 infraction in over 20 years of commercial operations.
23 Foundationally these are just not meritorious defenses,
24 they stand in opposition to the CAFTA and the basic rule
12:41:11 25 of law.

12:41:17 1 As I already identified, Nicaragua has
2 never explained why it didn't serve the court's
3 December 21 decision upon Riverside when such
4 notification was required. That is exactly what you've
12:41:28 5 already ruled on in Procedural Order 4, paragraph 37.
6 There's no reason.

7 Nor does it explain why Nicaragua withheld
8 the information from the Tribunal or Riverside in this
9 arbitration proceeding. And we note that to date we've
12:41:45 10 never been served with any proceeding arising from the
11 local courts in Nicaragua, even though there have been
12 more. They've never requested voluntary acceptance of
13 service from Riverside. They know where we are. They
14 had no shortage of sending emails. You can see that
12:41:58 15 yourself. They know exactly how to reach us. Why did
16 they not do that? There's no difficulty whatsoever. I
17 get emails all night. You see that from your own hours
18 at the end of the day. There's nothing that prohibited
19 them from doing that, but they did it not once. They
12:42:12 20 just withheld the information and then tried to justify
21 it. We'll have an opportunity to discuss some of this
22 as we go along.

23 Of course finally with the issue of
24 legitimate expectations here, as I noted before that the
12:42:26 25 regulators, they met with INAGROSA, they talked to them,

12:42:28 1 they reviewed their practices, they told them they were
2 not being incompliant, they reviewed the law and then
3 all of a sudden now they say that they are basically on
4 the most wanted list, that they can't make their
12:42:42 5 business work. That is just manifestly wrong.

6 Now I'd like to turn to the issue of
7 expropriation. Again, the first issue here to talk
8 about is the MFN issue. Again, we have a situation
9 where expropriation under the obligation here of a CAFTA
12:43:03 10 is more limited because of interpretive annexes and that
11 the autonomous obligation under the Russian treaty is
12 significantly broader.

13 So, first of all, you'd have a much
14 broader obligation under the Russian treaty
12:43:17 15 substantively than you have under the CAFTA. It is
16 unburdened by the interpretive annexes and the
17 restrictions that are there. We say that is the
18 appropriate spot.

19 Second, we have a de jure -- by the way
12:43:32 20 that's article 5 of the Russian treaty we're talking
21 about.

22 Second of all we have a de jure taking as
23 we identified just a few moments ago, the government
24 actually changed the paperwork and before we had
12:43:47 25 exclusive title, all of a sudden we don't. They say oh,

12:43:49 1 it doesn't count. Of course it counts. Core legitimate
2 business expectations are based on your registration.
3 If your registration says that you own your house and
4 all of a sudden somebody else owns the house with you,
12:44:01 5 you don't own your house. You don't have those rights.
6 You can't do anything. You share those rights. That's
7 not the same. And we're sharing the rights with people
8 who oppose the interest and that put our senior
9 management under death threat. That's not a very good
12:44:16 10 relationship or very viable one to see and to have.
11 And then we have the issue of substantial
12 deprivation. The occupiers disclosed when they came in
13 in a *res gestae* expression they were sent by Jinotega
14 Mayor Leónidas Centeno, he ordered the invasion to take
12:44:35 15 place and they're there in the name of the state.
16 Favio Enriquez admits to Luis Gutiérrez
17 that Nicaragua supported the invasion. Other senior
18 officials -- Congressman Castro instructs the invaders
19 to continue the occupation. He acknowledges it. He
12:44:51 20 recognizes it. He offers support from the State for it.
21 This is a direction in July 2018, and then the damage
22 results.
23 And Professor Wolfe, in his statement,
24 says that this is all consistent. So, accordingly,
12:45:08 25 Nicaragua is acting in a manner that's inconsistent with

12:45:11 1 CAFTA article 10.7 for expropriation and the
2 interference.

3 So basically on the issue of this key part
4 of the law we've demonstrated that all these facts are a
12:45:24 5 complete disregard of the international law principles
6 of fair and equitable treatment and other obligations
7 under article 10.5.

8 We've shown the serious, serious breach of
9 full protection and security. You can't have that --
12:45:35 10 look at what went on here. Just didn't do what they
11 needed to do, didn't show what they needed to do, didn't
12 provide the evidence they needed to do. None of that.

13 Even if they were to have a situation of a
14 non-government they didn't meet the tests that are
12:45:51 15 shown. And they have a working government. They just
16 happened to use the police to carry out their -- the
17 reason the police aren't available is they're busy
18 oppressing their citizens. That's why they're not
19 available. That's a choice of the government but they
12:46:08 20 still have an obligation to protect the foreign
21 investors but they decided to use it to harm their
22 citizens and individuals, to arrest the members of the
23 church without charge, to take away their property, the
24 universities, to take away the free press. That's what
12:46:21 25 they're using the police for and the army. That's why

12:46:23 1 they're not available. They're busy right now.

2 But that's not a legitimate answer and
3 that cannot be the basis to invoke essential security.
4 That cannot be in good faith. Can't be.

12:46:35 5 So we have abuse process we've talked
6 about. We'll talk about all of this in the closing.
7 I'm not going to worry about that right now. I'm going
8 to focus in a little bit on the business.

9 So the first issue I want to talk about is
12:46:46 10 control. Riverside controlled INAGROSA. It owned all
11 of INAGROSA'S debt. It invested about \$9.5 million in
12 direct investments. Riverside had 25.5 percent of the
13 shares in INAGROSA at the time of the occupation.

14 Previously it had 50 percent of the shares but it
12:47:03 15 redistributed them. Its former president, Ward Nairn,
16 held 24 percent of the shares. Melvin Winger held
17 25 percent -- 25.5 percent of the shares. He was the
18 president at the time of the invasion and a witness in
19 this arbitration who has passed away. And Riverside had

12:47:19 20 25.5 percent of the shares. These shares were voted
21 together as a control block run by Riverside. The
22 control was disclosed in US federal income tax filings
23 from 2015 onward. So years before the invasion.

24 Riverside discloses its control of
12:47:37 25 INAGROSA in federal US filings and files the forms on

12:47:40 1 it. This demonstrates for years that Riverside had
2 controlled INAGROSA as a controlled foreign subsidiary.
3 Nobody would file a form years in advance anticipating
4 that they're going to be invaded by the Sandinistas.

12:47:54 5 That's ridiculous.

6 Riverside not only had voting control and
7 held all the debt, it was also committed through formal
8 corporate acts to support the transition from coffee to
9 Hass avocados. This was a commitment of \$17.5 million.
12:48:10 10 16 million of new investment, 1.5 million of interest
11 deferment. So they controlled the old investment, the
12 new investment, the expansion. They had the issue of
13 the votes, and they have the issue foundationally of the
14 issue of corporate officers. Three of the corporate
12:48:35 15 officers or four were Riverside appointees or Riverside
16 people, including the fact that there was a corporate
17 secretary that was in the name of Riverside.

18 Mrs. Rondón in her witness statement
19 identifies that she was the legal representative to
12:48:52 20 Riverside and she fulfilled the duty of a corporate
21 secretary, but that was formally in the name of
22 Riverside. So that's even acknowledged into their own
23 documents. The president was her father, and I believe
24 the treasurer was the former president, Mr. Nairn,
12:49:07 25 another Riverside member.

12:49:09 1 So it's all together -- can you just put
2 the slide up? We've just -- indicia of control, owned
3 all the past debt, committed to future investment,
4 controlled the key officer positions, did the annual IRS
12:49:22 5 filings of showing control, approved the key decisions.
6 I forgot that. And had consistent voting control.
7 It all fits because it all makes sense.
8 So that's the issue with respect to that.
9 Then we have the issue of business plans.
12:49:40 10 INAGROSA had a plan, had access to capital to make the
11 plan come together. It also had the necessary
12 productive volumes of Hass avocados. And it had that --
13 by the time we're getting to 2018, that would have been
14 its second successful year of being able to produce Hass
12:49:59 15 avocados. Hass avocados, remember, are a long cycle
16 fruit tree. They have to grow.
17 So the test is are you able to grow them?
18 Once you're able to grow them, you sell into a commodity
19 market. So they had a business plan. They were dealing
12:50:14 20 with specialized agricultural commodities. They had
21 strategic capital investments all lined up. Some were
22 ready, other ones they were going to get. They had
23 utilization of third-party transport for distribution
24 and Hass avocados, which they had done early over their
12:50:29 25 coffee. Remember they'd been in the coffee business

12:50:32 1 doing exports for almost 20 years. They knew how to
2 deal with commodity products. This was just a different
3 product line.

4 The key thing was could they grow the
12:50:41 5 avocados? The answer was yes, until what they didn't
6 bank on was to have the Sandinistas send people in and
7 take over their land and then destroy everything. Years
8 of work gone. Their dreams almost shattered. For what?
9 And no protection from the police. Nothing from the
10 State.

11 Let's just talk a little bit briefly about
12 damages in my remaining minutes.

13 So what does this all mean to Riverside?
14 So Riverside suffered severe damages to the entirety of
12:51:11 15 its investment. INAGROSA itself, and it suffered
16 serious suffering to its employees which are answered by
17 moral damages.

18 You're going to hear from Vimal Kotecha
19 from Richter in this arbitration who's filed two
12:51:26 20 valuation reports. He provides a clear breakdown of the
21 damages arising from the breach of the treaty.

22 The midpoint of the total economic losses
23 claimed for the treaty breaches is just over
24 \$241 million. These include amounts for economic losses
12:51:40 25 and interest, don't include moral damages.

12:51:44 1 Mr. Kotecha's approach is straightforward.
2 The loss determination has two main components: first,
3 losses incurred due to the value of the business on June
4 16, 2018 which is to provide compensation for the
12:51:54 5 occupation of Hacienda Santa Fé from the first date of
6 its interference. This is as mandated by CAFTA article
7 10.7(2).

8 Second, Mr. Kotecha adds interest to the
9 amounts that's also specified by the treaty. Moral
12:52:10 10 damages are separate. They are to be assessed generally
11 by tribunals, not by the valuation experts, so he
12 doesn't include any amounts for moral damages or
13 interest, only the economic losses. That's what the
14 valuation experts do.

12:52:24 15 In the alternative, Mr. Kotecha provides a
16 damages calculation based solely on the land value of
17 the property. The alternative damages calculation
18 provides for no compensation for the lost profits that
19 INAGROSA suffered and thus the loss to Riverside is due
12:52:39 20 to the destruction of the Hass avocado plantation owned
21 by INAGROSA.

22 For his part Mr. Hart, who I understand is
23 here today, rejects all the evidence from Riverside but
24 provides no serious damage calculations. He even goes
12:52:56 25 so far as to claim that Riverside suffered no damages

12:53:00 1 whatsoever. Mr. Hart ignores the documents in the
2 record saying that everything is too speculative. He
3 refuses to provide the calculation unless he is in
4 receipt of the most perfect information. But the real
12:53:13 5 world doesn't work that way. About 20 years ago
6 companies kept ledgers and even notations by hand. That
7 doesn't mean that the data is invalid. Mr. Hart
8 conveniently rejects it nonetheless and provided no
9 responsive calculation.

12:53:27 10 And Mr. Hart disagrees with using a DCF,
11 discounted cash flow, approach to model the damages for
12 expropriation, arguing it's too speculative because the
13 avocado business was just beginning. But as we'll see,
14 that's exactly why you should be using a DCF, especially
12:53:45 15 when Riverside had two successful Hass avocado growing
16 seasons.

17 Mr. Hart's approach to the rate of return
18 is contorted. The report is an "all or nothing"
19 conclusion and he says that there should be nothing even
12:54:00 20 though INAGROSA, and thus, Riverside suffered a total
21 loss here.

22 Mr. Kotecha's reports provide a clear
23 breakdown of all the components in his conclusion of
24 losses and he also has offered alternative loss
12:54:14 25 scenarios. Mr. Kotecha's approach reflects the economic

12:54:19 1 impact upon Riverside and provides a much greater
2 assistance to the Tribunal.

3 Now, we want to focus on the alternative
4 damage scenario from Mr. Kotecha briefly. He gives you
12:54:30 5 an alternative damage situation which provides
6 replacement costs for the large agricultural land
7 holding and interest. That's set out in table 5 of his
8 Reply report. He calculates those damages at
9 \$166 million.

12:54:43 10 And Riverside also seeks moral damages for
11 the intense suffering that's happened with respect to
12 Riverside. The Riverside team suffered damages as
13 distress disorders, loss of concentration, memory,
14 anxiety-caused sleep problems.

12:54:59 15 The evidence before this Tribunal
16 unequivocally and conclusively shows us now what
17 happened. Nicaragua portrays Riverside's case as a case
18 of speculation. It suggests that Riverside did not
19 validly possess the right to operate its longstanding
12:55:13 20 agricultural operations at Hacienda Santa Fé, that
21 INAGROSA was a mere startup company that could not
22 successfully operate. But Nicaragua's excuses ring
23 hollow and false.

24 And the Tribunal will see in this hearing
12:55:28 25 Riverside's Nicaragua investments had valid property

12:55:32 1 interests in Hacienda Santa Fé. Riverside made a large
2 investment in INAGROSA. This was not a startup company,
3 but an expansion of an existing business. Nicaragua's
4 actions unfairly crippled INAGROSA'S entire corporate
12:55:46 5 operations.

6 We'll consider the valuation of damages in
7 the closing, but we want to stress that the Tribunal
8 should be mindful of the following:

9 INAGROSA had been successful in the
12:55:58 10 agricultural business for more than 20 years.

11 INAGROSA had successfully produced two
12 harvests from its Hass avocado plantation by 2018. It
13 had a successful harvest in 2017, that harvest was
14 tested. It was processed into avocado oils and seeds.

12:56:15 15 And these seeds were retained for the expansion of the
16 avocado operation, which is what was underway. That was
17 part of its plan and what it was doing.

18 In 2018 there was a second harvest. The
19 immature Hass avocado trees were harvested before the
12:56:29 20 invasion. The seeds from that were being retained for
21 its expansion because it was expanding, and then the
22 invasion came in and wiped out what was left. The
23 mature harvest on the trees was wiped out. It was
24 scheduled to start after when the invasion took place.

12:56:47 25 INAGROSA had established a successful Hass

12:56:50 1 avocado production, not once but twice, and had
2 successfully demonstrated it could produce commercial
3 harvest of Hass avocado at Hacienda Santa Fé to support
4 its commercial operations.

12:57:03 5 So INAGROSA would have sold these avocados
6 to the export market. Had cultivated coffee before that
7 which it had sold to the exports markets and it would
8 have done exactly the same for Hass avocados.

12:57:18 9 The standing forest itself was a separate
10 and valuable asset and had been tendering and taking
11 care of this forest and planning a sustainable long-term
12 harvest since the 1990s where it had a longstanding
13 relationship with a large veneer company in the United
14 States, Miller Veneer, over a hundred years of
12:57:37 15 operation, for a first right of refusal for the sale of
16 its woods and in the meantime the standing forest
17 continued to have sustainable yield.

18 So Riverside comes here with a noble
19 purpose, its dreams are shattered, it's shuttered down
12:57:53 20 its business and everything goes over.

21 So in conclusion, we can tell you to this
22 day that you're going to hear about lost opportunities
23 of Riverside and the tragedy that results from poor
24 governance with its citizens. And the citizens are the
12:58:09 25 ones who bear the biggest costs from this egregious

12:58:12 1 treatment, not just the foreign investors. They all are
2 there, so your decisions have impacts not only for
3 Riverside -- and you are the only people that can help
4 them -- but also for the citizens of Nicaragua, who are
12:58:25 5 also watching and looking to see what you're going to
6 do. And to this day Nicaragua simply refuses to take
7 responsibility for its wrongful actions. Instead, it
8 delayed relief, denies responsibility and has attempted
9 to distract this Tribunal again and again.

12:58:42 10 This Tribunal is the only body that can
11 provide that relief. It's the only body that has
12 independent rule of law. It's the only body that's able
13 to make determinations and decisions and so chapter 10
14 of the NAFTA provides a remedy and it's this remedy that
12:59:00 15 Riverside seeks from you.

16 We thank you for your patience and for
17 your assistance today, and we look forward to an orderly
18 hearing where we can have everything heard over the next
19 two weeks.

12:59:13 20 So thank you very, very much.

21 PRESIDENT: Thank you, Mr. Appleton. Any
22 questions from my colleagues?

23 Thank you. So that concludes the
24 Claimant's opening statement. We are very much on the
12:59:30 25 schedule, and so we will break for one hour and we will

12:59:37 1 resume at 2 p.m. Thank you very much.

2 (1:00 p.m.)

3 (Recess taken)

4 (2:27 p.m.)

02:27:40 5 PRESIDENT: So let's resume.

6 Ms. González, for the Respondent's opening statement you
7 have the three hours. We haven't identified when you
8 should take the break. It's up to you whenever
9 convenient.

02:27:59 10 MS. GONZÁLEZ: Yes, we would like to take
11 two breaks, two 7-minute breaks. I will start first to
12 discuss the facts. Then my colleague, Carlos
13 Ramos-Mrosovsky, will discuss the merits and damages and
14 we would like a short break in between each of our
02:28:17 15 presentations.

16 PRESIDENT: Okay, that is also fine.
17 Please go on.

18 **OPENING STATEMENT ON BEHALF OF RESPONDENT**

19 MS. GONZÁLEZ: Mr. President, members of
02:28:18 20 the Tribunal, we should not be here today. The dispute
21 over Hacienda Santa Fé is a 20-year dispute between a
22 farming cooperative and the Rondón family and those type
23 of disputes are not within the scope of the ICSID
24 Convention or DR-CAFTA.

02:28:35 25 Claimant presented an original narrative

02:28:38 1 before this Tribunal arguing that the government of
2 Nicaragua sent armed paramilitaries to take possession
3 of the Hacienda Santa Fé.

4 After Nicaragua proved that such story was
02:28:46 5 not true, Riverside shifted its original story to now
6 complain that the Nicaraguan government did not act fast
7 enough when sending the police to eject the farmers from
8 the Hacienda and that at a time where the country was
9 undergoing severe waves of violence and social
02:29:04 10 disturbance in the country. Those claims, members of
11 the Tribunal, are barred under the terms of the
12 DR-CAFTA.

13 Again, we should not be here today.

14 Riverside seeks hundreds of millions of
02:29:18 15 dollars for its avocado business. Do you see this?
16 This is an avocado Hass that I bought at a DC market,
17 and this is more than what Riverside was ever able to
18 export. And you know why?

19 First, because they have been unable to
02:29:36 20 show that they had a real and solid avocado business.
21 No records, no permits, no money to grow its business.
22 No overwhelming evidence.

23 And second, because neither Nicaragua has
24 never exported Hass avocados anywhere, let alone to the
02:29:51 25 United States where there is a ban on Nicaraguan

02:29:54

1 imports.

2

Again, we should not be here.

3

Nicaragua has never disputed that Hacienda Santa Fé was and is owned by INAGROSA. You will not find a single piece of evidence on the record in the more than 1700 exhibits that have been submitted to date where INAGROSA challenges the ownership of Hacienda Santa Fé.

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Claimant fabricated this story taking

02:31:23 1 advantage of a very convoluted and painful time of
2 disturbance in the country to make their narrative fit
3 into an investor-state dispute.

02:31:33 4 Perhaps taking advantage of the political
5 propaganda, let's see what we can get from Nicaragua.
6 But they never imagined that Nicaragua was going to be
7 so prepared to discredit their story with
8 contemporaneous evidence, something that is lacking in
9 Claimant's case.

02:31:47 10 So they kept changing the story as the
11 arbitration was advancing. All of a sudden, documents
12 that were allegedly stolen, not backed up on computers,
13 they magically appeared in their second brief.

02:32:07 14 It is a case that changed constantly.
15 Riverside changed the government alleged role from
16 sending in paramilitaries to not sending in the
17 military. Then they abandoned the term paramilitaries
18 to occupiers and now we hear for the first time about
19 armed thugs. This is still missing the woman and the
02:32:25 20 children.

21 Riverside changed the scope of its claim,
22 saying it was doing so on behalf of INAGROSA before
23 admitting it was doing so on its own behalf. Riverside
24 also changed its damages numbers, going from around
02:32:40 25 650 million to around 250 million. Riverside also

02:32:45 1 changed when it was supposedly going to sell avocados
2 into the United States going from 2020 to 2022.

3 As you heard this morning, since they have
4 no case, Riverside's main argument consists largely of
02:33:00 5 alleged and irrelevant human rights abuses supposedly
6 committed by Nicaragua, none of which are relevant or
7 have anything to do with the specific issues in this
8 arbitration.

9 So they brought this case to see what they
02:33:14 10 could get from Nicaragua. Let me answer that question
11 for you. You can get the Hacienda back. It's all
12 yours.

13 Unfortunately, Riverside has refused to
14 take it back after the government has offered it not
02:33:30 15 once, not twice, but five times after the government
16 evicted the squatters in 2021.

17 If Riverside was more interested in
18 cultivation instead of litigation, I could sit down now
19 and the case would be over.

02:33:44 20 They have not presented a clear and
21 consistent case, they have not met their burden of
22 proof, and for that reason, we should not be here today.

23 But we are because of the seriously flawed
24 case brought by Riverside. To me, members of the
02:34:02 25 Tribunal, it is a great honor to be representing the

02:34:05 1 Republic of Nicaragua. What the evidence has shown is
2 that this country has taken all its obligations under
3 DR-CAFTA very seriously. With only seven policemen in
4 the state of Jinotega, they were able to evict more than
02:34:19 5 600 people in a pacific way. To me, these policemen are
6 heroes. They have exceeded its obligations under the
7 treaty. They should not be punished for conduct that is
8 not attributable to the government of Nicaragua.

9 Ricky, can you please now put on the
02:34:44 10 presentation?

11 Members of the Tribunal, my name is Analía
12 González and along with my colleagues, Carlos
13 Ramos-Mrosofsky, Marco Molina and others, we represent
14 the Government of Nicaragua and it is an honor to do so
02:35:03 15 and present before you in this arbitration.

16 Nicaragua's opening arguments will be
17 presented by three members of our team. First, I will
18 describe the facts relevant to this dispute and
19 demonstrate that the invasion of Hacienda Santa Fé in
02:35:16 20 2017 and 2018 was not carried out by so-called
21 paramilitaries or occupiers or armed thugs following the
22 instruction of the Government of Nicaragua and therefore
23 is not attributable to Nicaragua. Then, my colleague,
24 Carlos Ramos-Mrosofsky, will address the merits of this
02:35:34 25 case addressing attributions, exceptions to liability

02:35:36 1 under DR-CAFTA, and the substantive standards of
2 protection under the treaty. And finally, my colleague,
3 Marco Molina, will cover Riverside's damages arguments
4 and will demonstrate that the avocado-to-riches story on
02:35:52 5 which they are based not only sounds too good to be
6 true, it is in fact not true.

7 Let's start with the facts. Before I
8 start, I would like to set the setting.

9 Hacienda Santa Fé is located in Nicaragua
02:36:08 10 in the Department of Jinotega. This department has
11 seven municipalities and the Hacienda Santa Fé is
12 located in the municipality of San Rafael del Norte,
13 specifically in the northeast region of the
14 municipality.

02:36:24 15 As you are well aware by now, the Hacienda
16 Santa Fé is divided into two parcels: the southern area,
17 known as Santa Fé, and the northern area, known as
18 El Pavón, and it is divided by a public road that you
19 can see in the picture in red on which you can see the
02:36:44 20 Hacienda house and the nearby plantation. With the
21 arrow you can see where the house is located at the
22 lower part -- it is located there in the map.

23 So the Hacienda has an area of
24 1,142.5 hectares. That equals 11.42 square kilometers
02:37:10 25 or about almost 5 square miles. This is a very big

02:37:16 1 extension of land.

2 To give you an idea of this area, I am
3 sure all of you are very familiar with the City of Paris
4 and you know that the City of Paris is divided by
02:37:24 5 arrondissement. So the area of the Hacienda is about
6 the size of the sum of the 1st to 6th arrondissement in
7 Paris, which is about one-tenth of the size of Paris,
8 which Paris is 105 square kilometers.

9 You may recall, members of the Tribunal,
02:37:49 10 that we produced a drone video that includes a visual of
11 the Hacienda Santa Fé and the town in which it is
12 located in San Rafael del Norte. Interestingly enough,
13 Claimant never produced any footage of the Hacienda
14 which is at the heart of every allegation made in this
02:38:08 15 arbitration. And when we produced the drone video that
16 I am about to play for you, Claimant tried to strike it.

17 I will ask Mr. Ricky to play five of these
18 drone videos. They all come from Exhibit R-231. The
19 first two videos are taken from the upper part of the
02:38:29 20 Hacienda. Videos No. 3 and 4 are taken from the lower
21 part of the Hacienda where the Casa Hacienda is located
22 and finally the fifth video, it's a video that will show
23 the public road connecting Casa Hacienda with the
24 San Rafael del Norte.

02:38:51 25 So next, please? This is the footage of

02:38:56 1 Hacienda Santa Fé that Claimant and its lawyers didn't
2 want you to see. So in this video the drone is flying
3 over, as I mentioned, the El Pavón sector. This is the
4 area where the squatters settled in 1990 and lived there
02:39:18 5 for 14 years until they were evicted in 2003. Some of
6 them came back in 2017, and that area is very, very
7 important.

8 I'm sure that by now you are very familiar
9 with the Cooperativa El Pavón which was created by
02:39:36 10 former members of the Resistencia Nicaragüense that
11 lived, settled in that property in that plot of land and
12 that's where they had their lands and they called that
13 their home. That's where they had their schools, that's
14 where they had their families. They lived there for 14
02:39:54 15 years until they were evicted and they later came back.

16 As you can see from the map, this area is
17 very far away from the Hacienda Santa Fé. The area is
18 very dense. It is so dense that actually if you are
19 there in the sector of the El Pavón it's very impossible
02:40:12 20 to see what's going on in the Casa Hacienda because the
21 distance actually that is in between the Casa Hacienda
22 and El Pavón, it's about -- if you were to draw a
23 straight line, it's about 3 kilometers. You will see
24 later that it's not a straight line but about
02:40:30 25 3 kilometers or 1.86 miles.

02:40:37 1 This area is also very hilly and you might
2 have read in the pleadings that Riverside alleged that
3 the investor completely deforested the Hacienda Santa Fé
4 where, as you can see from the pictures, there is no
02:40:52 5 indication there has been any deforestation. You can
6 see that with your own eyes.

7 Now I will show you another video, also
8 from the El Pavón sector, and that video, as I
9 mentioned, also start from the El Pavón section and it
02:41:07 10 will show you the internal road that connects El Pavón
11 with the Casa Hacienda. That road that you can see in
12 the middle of the video, it's a very narrow road.

13 As I mentioned, the distance to give you
14 an idea is approximately the same distance between
02:41:25 15 Louvre and Sacre Coeur. We heard this morning
16 Mr. Appleton alleged that DR-CAFTA required Inspector
17 Vargas to go up this road by himself to arrest 300
18 people, invaders. But look at that road, and ask
19 yourself, was that really a reasonable thing to do? He
02:41:50 20 is not Batman, and even Batman would need Robin to fight
21 crime.

22 Let's go to the next video, please, Ricky.
23 I will now focus on the lower part of the
24 Hacienda where the Casa Hacienda and the plantation is
02:42:04 25 located. Before we play the video, I would like to show

02:42:08 1 something to you. In that portion, in that picture you
2 can see the Casa Hacienda with a red roof and you can
3 see that there are two roads right there. There is a
4 curved road that actually is the internal road that
02:42:21 5 connects the Casa Hacienda up to El Pavón sector and you
6 can also see the public road, which is straighter.

7 You can see there also the houses of some
8 of the guards, but something that is very important,
9 members of the Tribunal, is that these public roads, as
02:42:43 10 you can see, is just a few steps from the Casa Hacienda
11 and that is very important because you could see in this
12 arbitration some discrepancy on whether if you were
13 driving in the public road it was possible or not to see
14 whether the Casa Hacienda was abandoned or not in 2017.

02:43:01 15 And as we know from the testimony of Mr. José Valentin
16 López Blandon, anyone who drove -- you can see that in
17 the picture -- anyone who drove on this public road
18 could see that there was no activity or whether there
19 was activity or not in the Hacienda. It is right there
02:43:20 20 a few steps from the house.

21 Please play the video, Ricky.

22 So, again, now the video will shift to the
23 right and show you the house of the security guards and
24 it is showing you the public road that crosses the
02:43:43 25 Hacienda Santa Fé, the northern part from the lower

02:43:47 1 part, and you can see how big and heavily forested this
2 area is. I don't see any deforestation here.

3 So all this area, both sides of the public
4 road, is part of the Hacienda Santa Fé.

02:44:23 5 PRESIDENT: Just to make sure we are all
6 on the map, is this the road that is going between
7 El Pavón and --

8 MS. GONZÁLEZ: Exactly. The public road
9 that I was showing -- sorry, members of the Tribunal.

02:44:37 10 The other one I was showing earlier is the one that goes
11 from here to here. From here to here is about
12 3 kilometers if you want to draw a straight line. But
13 it wasn't straight. It was curving.

14 PRESIDENT: Thank you.

02:44:51 15 MS. GONZÁLEZ: Thank you, Ricky. Can we
16 go to the next video, please.

17 So video No. 4 is also from the lower part
18 of the Hacienda and I would like to show you now where
19 the avocado plantation was located. Could you please
02:45:06 20 play the video.

21 So here we are also looking at the public
22 road at the lower part and where the plantation was
23 located is where you can see that the grass is shorter.
24 That area, apologies, I would like to show you that from
02:45:24 25 here.

02:45:27 1 MR. APPLETON: I wonder if we could be
2 shown on the big picture.

3 PRESIDENT: It may be easier also
4 because -- at least for the court reporter.

02:45:39 5 Are you able to have it -- you will have
6 to explain it in front of the mic.

7 MR. APPLETON: Mr. President, we were
8 trying to tell you that our screen has gone dead here so
9 we are unable to see it here. For some reason as we've
02:46:05 10 done this, it's just gone dead on us.

11 PRESIDENT: Let's break to fix that.

12 MR. APPLETON: We're going to watch you
13 right now.

14 PRESIDENT: But you can see this?

02:46:19 15 MR. APPLETON: We'll do our best. We'll
16 let you know if we can't.

17 PRESIDENT: If it doesn't work, let us
18 know and we'll break to fix it. Please go on,
19 Ms. González.

02:46:39 20 MS. GONZÁLEZ: Again, please, Ricky, if
21 you can play this video. Again, this is the public
22 road. Here, this is the public road which is this one
23 here. The avocado plantation was located here in this
24 area that is the grass is shorter. As you can see,
02:46:53 25 there is a lot of vegetation here.

02:46:56 1 Why is it important? Below this
2 vegetation is where the arm of the Diamante River is
3 located. You cannot see the river here, but if you go
4 to Exhibit R-166, which is the map, it will show you
02:47:11 5 exactly that the river goes here.

6 And why is that important? It's important
7 because another point of discrepancy between the parties
8 in this arbitration is exactly what was the distance
9 between the plantation and the river because of the
02:47:30 10 permits that might have been required. So the river
11 goes just in that where all the trees are -- you know,
12 it's below that. Thank you.

13 Okay. Ricky, if you can please play the
14 last video.

02:47:50 15 So now again, now we are in San Rafael
16 del Norte and this is the public road or portions of the
17 public road that connects San Rafael del Norte, the
18 police station, with the lower part of the Hacienda,
19 with the Casa Hacienda.

02:48:06 20 So earlier I showed you this from the
21 drone. Now it's like if you were to drive, this is how
22 it looked like. As you can see, it's very narrow. You
23 can find animal tracks. It gets severely damaged when
24 it rains and -- well, you know, evidently it's very
02:48:31 25 difficult and narrow and difficult to navigate. It's

02:48:34 1 curvy, it's hilly, it's not paved. So you can imagine
2 how difficult it was for the police having to navigate
3 this narrow road during the protests when there was
4 violence and barricades cutting the road.

02:48:50 5 Mr. Appleton said this morning the police
6 did nothing on June 16. Well, they were there on
7 June 17. You can imagine how difficult it is. It was
8 not only that you can see how difficult it is and where
9 it is located, but also there were barricades. So it
02:49:05 10 was very difficult -- it is very difficult to navigate
11 that road. Thank you.

12 So despite this enormous size -- I'm
13 sorry. I'm just -- let me see.

14 Speaking about the police, so here are
02:49:25 15 some pictures of the San Rafael del Norte police
16 station. It's the house in light blue with the red
17 roof, and as we have described during this arbitration,
18 it didn't have many resources. This is how it looks
19 actually after it has been renovated. Just for
02:49:44 20 reference, in each of the videos that I've shown, the
21 drones, you have a GPS that shows all the coordinates in
22 case you want to check that later.

23 Despite its enormous size, as I mentioned,
24 more than 11.42 square kilometers, the Hacienda Santa Fé
02:50:03 25 was custodied by only three guards. No surveillance

02:50:09 1 cameras, no wiring of any type. The Tribunal probably
2 remembers the episodes of violence that took place in
3 the center of Paris last summer. Could you image what
4 would have been the result if you only had three people
02:50:20 5 in charge of the initial security?

6 Members of the Tribunal, let's now turn to
7 the facts of the dispute.

8 During this arbitration we heard Riverside
9 lawyers describe this invasion as a militaristic
02:50:38 10 operation orchestrated at the highest levels of the
11 Nicaraguan government. To hear them tell it, it sounds
12 like the plot of a Hollywood action movie. But just
13 like a Hollywood movie, the story you heard this morning
14 is fiction.

02:50:52 15 This afternoon I will walk you through
16 what actually happened based on the objective
17 contemporaneous record in the evidence -- evidence in
18 the record -- and I will explain that this invasion was
19 not the result of a government land grab carried out by
02:51:06 20 paramilitaries.

21 Rather, this 2017-2018 invasion was the
22 latest invasion in a series of invasions resulting from
23 a decades-long property dispute between two private
24 parties: INAGROSA and a private farming cooperative
02:51:22 25 known as Cooperativa El Pavón. It may not sound as

02:51:26 1 exciting as the Hollywood script that Claimant put in
2 its Memorial, but it just happens to be the truth.

3 To understand the real story of the
4 invasion of the Hacienda Santa Fé, it is important to
02:51:39 5 keep in mind that the story began way before the 2018
6 invasion. The invasions arose out of a dispute between
7 the community members and the Rondón family which began
8 in the '90s. Claimant ignored the whole history of this
9 dispute. That is very relevant to what happened later
02:51:58 10 in 2017 and 2018.

11 For purposes of describing the story, I
12 have divided the history of the invasion into five
13 phases:

14 First one, the original settlement, which
02:52:09 15 is during the '90s, the squatters first settled in the
16 El Pavón area of the Hacienda Santa Fé. From 2015
17 through 2016 is when the Hacienda is free of squatters.
18 As you know already, 2017 and 2018 is when there is a
19 new invasion, eviction and retake. Finally, during
02:52:34 20 2019, '20, '21, final eviction and relocation. And,
21 finally, I would like to discuss the protective order
22 and what is going on until nowadays.

23 So it is important to understand the
24 historical context, as I mentioned, to contextualize
02:52:53 25 these disputes. For about 40 years, from 1939 to 1979,

02:52:59 1 the Somoza family ruled in Nicaragua. With the passage
2 of time, an opposition movement was formed later known
3 as Frente Sandinista de Liberacion Nacional. In
4 July 1979, Anastasio Somoza resigned as President of
02:53:14 5 Nicaragua and the Junta Nacional de Reconstruccion takes
6 power.

7 That time marks the initiation of a
8 revolution in Nicaragua or civil war that lasted 11
9 years, the Sandinista Popular Revolution, and during
02:53:30 10 which President Ortega was one of its leaders, being
11 elected president in 1984. During those 11 years, there
12 were other groups, some of them members of the former
13 Somocist National Guard, that did not support the
14 revolution reforms and maintained hostilities with the
02:53:49 15 government. That group was known as the Resistencia
16 Nicaragüense (or Contra).

17 The elections were held again in
18 February 1990 and Ms. Violeta Barrios de Chamorro was
19 elected president.

02:54:05 20 This was a very bloody period in Nicaragua
21 with thousands of casualties. It was extremely
22 important, after so many years of war, to find peace.

23 As part of the peace agreements to
24 strengthen peace in Nicaragua, Ms. Violeta Barrios de
02:54:18 25 Chamorro undertook to reintegrate the demobilized

02:54:23 1 members of the Resistencia Nicaragüense, which had
2 fought against the Sandinistas in the revolution and
3 lost, into society. The plan was to grant them some
4 plots so they could settle there and work the land. In
02:54:34 5 other words, exchange guns for land.

6 In November 1990, the Barrios de Chamorro
7 administration appointed a commission, La Comisión
8 Agraria Regional de la Sexta Región, to relocate these
9 demobilized fighters and their families.

02:54:55 10 This commission was in charge of
11 identifying possible locations to relocate certain of
12 these members, including public lands or private lands
13 that were abandoned, in which case the government would
14 negotiate to sell or a compensation with the owners --
02:55:10 15 the sale or compensation.

16 The commission identified the Hacienda
17 Santa Fé as a possible location to relocate certain of
18 the members due to the fact that it was a large property
19 in an apparent state of abandonment.

02:55:24 20 It is important to remember that at the
21 same time that the commission was trying to identify
22 potential properties in the '90s, the Rondón family was,
23 at the same time, same year, August 1990, acquiring the
24 Hacienda Santa Fé. So this was happening
02:55:39 25 simultaneously.

02:55:40 1 Following the announcement by the
2 commission, certain ex-resistance members and their
3 families settled on the upper part of the Hacienda known
4 as El Pavón.

02:55:51 5 Over time, as you can see -- please go
6 back one slide, Ricky -- you can see there these people,
7 the children, the women there, they have -- they even
8 had the baseball team. You can see their school and,
9 you know, that was their home for 15 years. These
02:56:11 10 people, this community, grew to about 600 people around
11 2003, and these people called that area home. They were
12 peaceful people living there with children, with
13 families, with a school like in any other rural
14 neighborhood.

02:56:30 15 So, as I mentioned -- next, please.

16 Over time, the community grew into a large
17 community of more than 600 people, 102 houses by 2003,
18 schools, churches, baseball team. El Pavón is where
19 their families grew. These invaders also worked the
02:56:52 20 land which was for many years tolerated by the Rondón
21 family and planted over 250,000 coffee trees as well as
22 other crops in El Pavón.

23 This community incorporated itself as
24 Cooperativa El Pavón in 1997 and began a years-long
02:57:09 25 effort to obtain formal title to this property. Several

02:57:13 1 letters were sent by Cooperativa El Pavón to the
2 government begging the government to please convey
3 title. But, while the government recognized the
4 possession of the Hacienda El Pavón by the cooperative,
02:57:26 5 because the land was the property of the Rondón family,
6 the government refused to convey title over the land to
7 the occupants. It's very clear right there. This
8 property belongs to Ms. Ana Lorena Rondón Molina. That
9 has never been disputed by the Government of Nicaragua.

02:57:46 10 Never.

11 Around 1998, Carlos Rondón created
12 INAGROSA in Nicaragua and caused it to purchase Hacienda
13 Santa Fé from his family and sought to convert it from
14 an abandoned piece of property into a commercial coffee
02:57:59 15 plantation.

16 By that time, Mr. Rondón and his in-laws
17 created Riverside Coffee in the United States for the
18 purpose of pooling his in-laws' assets to fund the
19 coffee business in Hacienda Santa Fé. But Riverside
02:58:16 20 refuses to disburse any investments to INAGROSA unless
21 and until the invaders were all removed from the
22 property.

23 So first, however, INAGROSA had to figure
24 out a way to get rid of the invaders, who by that time
02:58:34 25 had been living on the El Pavón portion for nearly a

02:58:39 1 decade.

2 At that time INAGROSA did what is
3 typically done when you want to evict unauthorized
4 tenants from your property, you run to court and you get
02:58:46 5 an eviction order.

6 After getting that order, in 2000,
7 Mr. Rondón and Mrs. Rondón, on behalf of INAGROSA, wrote
8 a letter to the registrar, copying the president and
9 other high-level ranking officials to help them carry
02:59:03 10 out the eviction order in order to get rid of the
11 invaders.

12 The government pledged to help but
13 indicated that this could take some time because it
14 simply was not feasible, nor practicable to evict
02:59:14 15 hundreds of people without first relocating them.
16 Otherwise, they could just come right back.

17 So the Rondón family was involved in this
18 process and very active, requesting assistance from the
19 government. They even proposed a negotiating team that
02:59:29 20 would engage in dialogue with the members of the
21 El Pavón cooperative until they agreed to leave. They
22 were willing to wait and coordinate with the government
23 to get the invaders out right away.

24 In the meantime, the members of
02:59:44 25 Cooperativa El Pavón -- again, who had been living there

02:59:47 1 for more than a decade -- wrote letters to the
2 government pleading that they should be allowed to live
3 in Hacienda Santa Fé, their home, a place that was their
4 home for more than a decade.

02:59:57 5 But given the size of the invaders and
6 coupled with the fact that they consisted of demobilized
7 resistance fighters, the local authorities summoned the
8 National Police and other security forces from Managua,
9 several hours away. And over a period of a year, from
03:00:17 10 2003 to 2004, they methodically evicted the members of
11 the cooperative and even assisted INAGROSA in taking
12 down the dwellings and structures left behind by the
13 invaders.

14 So the relocation and eviction process
03:00:33 15 did, in fact, take some time. We are talking here about
16 600 people that you needed to relocate into another
17 property. On-site visits had to take place to take a
18 headcount and better understand the size of the families
19 who needed to be relocated together. Coordination had
03:00:50 20 to be done between several ministries, including the
21 Ministry of Finance, the Ministry of Foreign Affairs,
22 the Ministry of Education and the US Embassy in Managua.

23 Unfortunately, this was not a popular
24 event at that time. The local newspaper took the side
03:01:07 25 of the invaders and argued that the Nicaraguan

03:01:09 1 government was too harsh on the invaders and too
2 obedient to the demands of the Rondón family.

3 And because Nicaragua tried to move as
4 fast as possible to evict the invaders, by the time the
03:01:22 5 eviction happened, not all the invaders were able to be
6 immediately relocated. Again, we are talking about a
7 lot of people here.

8 Ultimately, many of the invaders resettled
9 nearby the Hacienda Santa Fé, embittered about having
03:01:38 10 been evicted from the place that they had called home
11 for nearly now 14 years. According to the testimony of
12 Mr. José Valentin López, a former president of
13 Cooperativa El Pavón and someone who was forcibly
14 evicted from the Hacienda and resettled about one
03:01:54 15 kilometer away, many of these individuals hoped to
16 retake the Hacienda at some point in the future.

17 You can see that, for example, this is
18 from Exhibit 177, which is the whole file of the
19 invasion and process of relocation in the early 2000s of
03:02:14 20 the Hacienda Santa Fé. These are, for example, a
21 certificate from January 2007 and you can see Valentin
22 López Blandón was still trying to find an answer and
23 claiming a solution to the situation.

24 So the evicted invaders got their wish in
03:02:35 25 2017. That's the year that INAGROSA had all but

03:02:38 1 abandoned Hacienda Santa Fé, and as my colleague,
2 Mr. Marco Molina, will explain later this afternoon,
3 INAGROSA was no longer a going concern at that point.

4 Its main source of income, its coffee
03:02:53 5 plantation, had been entirely wiped out in 2013 by the
6 Roya fungus.

7 In 2013, INAGROSA laid off most of its
8 workforce and used what little cash it had to pay off a
9 million dollar bank loan.

03:03:12 10 By 2014, it had no money to do much of
11 anything, as evident by the fact that INAGROSA could not
12 even pay its property taxes. Riverside, its only
13 investor, made its last investment in 2014, which was
14 used to pay off a bank loan, and tried, but failed, to
03:03:29 15 get anyone else to invest in INAGROSA.

16 Now, we know Riverside alleges that it had
17 a flourishing Hass avocado and forestry business during
18 this period, but as Mr. Molina will detail later this
19 afternoon, the few documents that Riverside has produced
03:03:48 20 from this period merely shows that INAGROSA was dabbling
21 in cultivating avocados and failing miserably at that
22 venture.

23 By 2015, things were so dire that INAGROSA
24 gave up the farming business all together and appeared
03:04:04 25 to focus on ecotourism business, as evidenced by the

03:04:09 1 contemporaneous document in this record showing that,
2 from 2015 to 2018, INAGROSA'S sole business venture was
3 seeking to have the Hacienda Santa Fé designated as a
4 private wildlife reserve so that it could benefit from
03:04:23 5 the financial incentives that come with that designation
6 and establish an ecotourism business.

7 During this period, the nearby residents
8 witnessed that Hacienda was mostly abandoned. The
9 Rondón family was in the US. There were no workers or
03:04:38 10 ongoing operations at the Hacienda. The only people who
11 were at the Hacienda were the three or four security
12 guards that INAGROSA kept at the Hacienda. That's it.

13 By the way, Riverside argues in this
14 arbitration that that is not true and that the Hacienda
03:04:53 15 was full of workers tending to the avocado plantation
16 and working hard on expanding the plantation by hundreds
17 of hectares.

18 But look closely at Riverside's telling of
19 the invasion story. Riverside alleges that hundreds of
03:05:08 20 invaders came into the Hacienda in waves over a
21 multi-week period and the only witnesses to this
22 invasion were the security guards. There is no
23 testimony from field workers about the invasion because
24 there were no field workers at the Hacienda during that
03:05:28 25 time.

03:05:31 1 I will now turn to the third phase shown
2 in red in the slide. This is a chronology of the
3 relevant events which I will explain.

4 So, in or around June 2017, the
03:05:46 5 Cooperativa El Pavón leaders, Wama, Avispa and Gorgojo
6 decided to invade the Hacienda and retake the El Pavón
7 sector of the property.

8 We know this because this is unrebutted
9 testimony of Mr. López. After the government evicted
03:06:03 10 him and his colleagues from the Hacienda in 2004, he
11 remained close with many of his former colleagues,
12 including Wama.

13 Mr. López explained that in June 2017,
14 Wama approached him and invited him to join a group to
03:06:21 15 invade the El Pavón sector of the Hacienda where they
16 and their families had lived for so long. Mr. López
17 declined to partake because he did not want to be
18 forcibly evicted by the police a second time. But Wama
19 went ahead and settled in El Pavón at that time with
03:06:38 20 about 170 people.

21 They lived in that part of the property
22 for about a year until June 2018, when the rise in civil
23 unrest in the area gave the invaders the perfect cover
24 to take the Casa Hacienda and the lower part of the
03:06:58 25 Hacienda. So they went from the upper part of the

03:07:01 1 Hacienda all the way down to the lower part of where the
2 Casa Hacienda was there because it was abandoned.

3 As shown in this slide, in a letter the
4 squatters sent to the Jinotega's Attorney General on
03:07:19 5 October 28, 2019, they indicated that "we have been
6 working these lands for two years and we have built our
7 houses in each plot." So that confirms that the
8 squatters entered the Hacienda in 2017. This is the
9 moment that Riverside's story begins and where the
03:07:35 10 parties' stories about the invasion start to merge.

11 But before proceeding to the next part of
12 the invasion story, I want to take a minute to discuss
13 the significance of the testimony of Mr. López.

14 Riverside dislikes Mr. López's testimony
03:07:54 15 because it undermines Riverside's story of a busy,
16 thriving Hacienda teeming with farmers and seasonal
17 workers. Put another way, if INAGROSA was actually the
18 multi-hundred million dollar enterprise Riverside says
19 it was, then the invaders would not have been able to
03:08:13 20 live at the Hacienda Santa Fé for a full year before
21 they were spotted.

22 Riverside also dislikes Mr. López's
23 testimony because it messes with their timeline.
24 Riverside wants to link the invasion to the 2018
03:08:29 25 protests in Nicaragua, to make it seem like the invasion

03:08:32 1 was some sort of retaliatory measure by the government.
2 But Mr. López's testimony refutes that premise.

3 Perhaps most importantly, Riverside
4 dislikes Mr. López's testimony because it refutes
03:08:47 5 Riverside's claim that the invasion was done at the
6 behest of the Nicaraguan government by supposed
7 paramilitaries. In reality, as Mr. López testified, the
8 invaders were members of a private farming cooperative
9 that had been embroiled in a decades-long property
03:09:07 10 dispute with the Rondón family.

11 And for these reasons, Riverside has taken
12 the unfortunate tack of defaming Mr. López, going as far
13 as calling him a criminal and a liar, and even attacking
14 his children. All without evidence, of course.

03:09:26 15 In contrast, there is extensive evidence
16 that supports Mr. López's testimony.

17 As an initial matter, there is all the
18 evidence I stated a few minutes ago showing that
19 INAGROSA has been in financial straits since 2013, which
03:09:39 20 corroborates Mr. López's testimony that INAGROSA had all
21 but abandoned the Hacienda by 2017.

22 Then there is the dossier of documents
23 that was filed as R-0177 and we implore the Tribunal to
24 read that dossier cover to cover, and we will be
03:10:01 25 mentioning it throughout this hearing. It consists of

03:10:03 1 the documents authored between 1990 and 2005 that
2 confirm Mr. López's story about the earlier invasion of
3 the Hacienda as well as Mr. López's testimony that the
4 invasion at issue in this arbitration is just the latest
03:10:18 5 iteration of a decades-long property dispute.

6 As I have shown, there is also the October
7 2019 letter from certain of the invaders themselves who
8 confirmed in writing that they had been living in the
9 Hacienda since 2017, which corroborates Mr. López's
03:10:35 10 account that the invasion that Claimant says began in
11 2018, in actuality began in 2017.

12 So starting in June 2018, both parties'
13 stories actually line up significantly. That's the date
14 that both parties agree that the invaders reached the
03:10:53 15 Casa Hacienda and used force to overtake the security
16 guards and the entire Hacienda Santa Fé.

17 What doesn't line up in the story is who
18 were these squatters. Claimant alleged that the
19 Hacienda was taken by paramilitaries sent by the
03:11:11 20 government. There is extensive evidence on the record
21 showing that the settlers were members of the
22 ex-Resistencia Nicaraguense that lived in El Pavón for
23 14 years and were evicted between 2003 and 2004.

24 The first one here, for example, a letter
03:11:31 25 from the Cooperativa El Pavón to Jinotega Attorney

03:11:34 1 General from June 5, 2018, that is a few days before the
2 invasion, request that the government -- to order the
3 possession --

4 I'm sorry. Could you go back. I'm sorry.
03:11:51 5 So it's very clear right there, they
6 mention:

7 "We were evicted in 2004 by the neoliberal
8 government of Enrique Bolaños by order of Ana Lorena
9 Rondón Molina."

03:12:02 10 "We request the government to order that
11 the possession of El Pavón, an agricultural service
12 cooperative, be restored to us rightful owners."

13 They are requesting that in June 2018 and
14 they are saying we are former members of
03:12:17 15 Cooperativa El Pavón that lived there many years ago.

16 The same people. Not any paramilitaries.

17 Next -- and by the way, if this was sent
18 by the government, why would these people be alerting
19 the government, sending a letter to the government some
03:12:33 20 days before they were going to invade, please restore me
21 the property? That doesn't make sense.

22 Next, please.

23 This letter also from June 25, 2018, after
24 the invasion. The invasion was on June 16 in 2018.

03:12:51 25 Again, "the lands assigned to us by the administration

03:12:56 1 of Violeta Barrios de Chamorro under a peace agreement
2 signed with members of the resistance. In 2002 we were
3 brutally evicted. Our families, house, crops, animals
4 against the entire Cooperativa El Pavón."

03:13:11 5 And what is their request? That the
6 Government of Nicaragua issues a certificate of title
7 for the Santa Fé parcel to the agricultural service
8 cooperative El Pavón.

9 So there is no doubt we are talking about
03:13:23 10 the same people that invaded many years ago that lived
11 there peacefully for 15 years, that they were going
12 back -- going back and asking now please, we are coming
13 back to our home.

14 Next, please.

03:13:41 15 Again, third one, September 5, 2018. The
16 Santa Fé parcel is a property that was granted to us,
17 the members of the former Nicaraguan resistance, as
18 evidenced by the certificate of November 22, 1990.

19 To this date, the property is possessed
03:13:59 20 and controlled by the members of the former Nicaraguan
21 resistance affiliated with El Pavón farming services,
22 et cetera, et cetera. Same people. Same people asking
23 again the government, please, please, convey title to
24 us. We would like to finally be a solution to our land
03:14:19 25 and our homes. We are coming back to what we consider

03:14:22 1 is our home.

2 So going to what happened during the
3 invasion, both parties agree that INAGROSA called the
4 police for help around this time. But the part of the
03:14:36 5 story that Riverside omits is that the police was
6 incapable to act immediately because, at that time, it
7 was overwhelmed by the unprecedented violence and civil
8 strife that was happening around the country.

9 As seen in the picture on this slide, the
03:14:52 10 damage caused by the civil strife was significant.

11 Riverside tries to downplay this civil
12 strife in this case by suggesting that it had little
13 effect on the town of San Rafael del Norte. But that's
14 not true. On the screen you have a translation of a
03:15:09 15 National Police report from May 2018. It states that:

16 "Every day since April 18, criminal gangs
17 of masked individuals riding motorcycles, wielding
18 firearms and mortars, have engaged in robbery, imposed
19 road tolls, injured and killed citizens, caused damage
03:15:33 20 to state and private property ... wrecked electricity
21 power lines ..."

22 All that has resulted in damage to
23 property, injuries and deaths. It was a very violent
24 period in all Nicaragua at this time, not only in
03:15:48 25 Jinotega. In all Nicaragua.

03:15:51 1 The protests began in April '18 and became
2 very violent by May 2018, at which point the protesters
3 set up barricades or roadblocks throughout the country,
4 including in San Rafael del Norte as seen on the slide.

03:16:07 5 When the police tried to establish law and
6 order, the protesters became even more violent.

7 And for that reason, in late May 2018, the
8 President Ortega ordered all police officers back to
9 their barracks for the foreseeable future to deescalate
03:16:28 10 violence with the hope that cooler heads would
11 ultimately prevail.

12 Claimant challenged the existence of such
13 order. It is clearly shown in the contemporaneous
14 police press releases that they were alerting the
03:16:41 15 population of the situation. You can see them on the
16 screen.

17 The National Police has not responded to
18 the acts of the crime gangs because of national dialogue
19 agreements in place to keep police forces in their
03:16:54 20 barracks in order to guarantee peaceful demonstrations
21 in the national territory and no police officers are
22 posted near university premises.

23 Two press releases, contemporaneous,
24 showing that that order did exist. In fact, the shelter
03:17:13 25 order was even described in the press. The government

03:17:16 1 agreed to withdraw the police from the streets, trusting
2 in the good will of the leaders of the Catholic church
3 who endorsed the proposal. There is a lot of
4 contemporaneous evidence showing that this existed.

03:17:30 5 Ultimately the measure worked, and in
6 July 2018, the civil strife slowly began to fade,
7 including in San Rafael del Norte where the town's seven
8 police officers had been overwhelmed by months with the
9 unprecedented uptick of violence and strife.

03:17:48 10 As I showed you earlier in the drone
11 video, the local police did not count on extensive
12 resources to handle significant strife, and because of
13 the barricades, they could not count on support from the
14 National Police in other cities, such as the police in
03:18:01 15 Managua, as they did in 2003.

16 This was not an easy period for the
17 Jinotega police. During these tragic months in
18 Nicaragua there were nearly 200 reported deaths,
19 including 22 members of the National Police; more than
03:18:18 20 1200 people injured, including 400 members of the
21 National Police; 252 buildings were vandalised,
22 200 kilometers of roads were destroyed. Almost 400
23 vehicles were destroyed.

24 The priority of the police was to restore
03:18:37 25 the order, save lives and protect their own lives.

03:18:42 1 Jinotega police was composed by seven police people.
2 The police of other departments were busy taking care of
3 the violence in the other provinces.

4 By the way, the eviction minutes that
03:18:57 5 Mr. Appleton showed you earlier this morning from
6 October 2018, those are all from Leon, which is
7 170 kilometers from San Rafael del Norte. That's
8 another province, and the police from those departments
9 were dealing with the violence that was going on in
03:19:13 10 Leon. So the fact that in October that police were able
11 to evict doesn't mean that in a rural area in San Rafael
12 del Norte in Jinotega with only seven police -- and you
13 have seen where the Hacienda was located, the roads, the
14 vegetation, everything -- that they were going to have
03:19:30 15 the same result as what the police was doing in another
16 part of Nicaragua. All the provinces were dealing with
17 its own disaster right there and violence.

18 Members of the Tribunal, in preparation of
19 this hearing, we interviewed and sat of course largely
03:19:49 20 with Mr. Herrera, Mr. Castro and we had the chance to
21 interview them and we asked them, like, why things
22 happened the way it happened. And the first thing they
23 told you is that we needed to protect our own lives.
24 That's what they told us. We were like seven against
03:20:06 25 300 people that they were reported that they were armed.

03:20:11 1 MR. APPLETON: I'm sorry, we have a little
2 objection. This is evidence from counsel now about
3 witnesses that are going to be before us and it's not in
4 the record. And I think that's not quite proper. So I
03:20:25 5 just want to caution counsel that this is not
6 appropriate and that there's an opportunity to ask
7 people who will be here questions, but you can't testify
8 on their behalf. They have to do that. It's very rare
9 for me to make any comment whatsoever in an opening, but
03:20:44 10 this is beyond the line, in our view.

11 MS. GONZÁLEZ: I can move on, no problem.

12 PRESIDENT: Move on. You can refer to the
13 evidence that is on the record but not to the evidence
14 that may enter the record.

03:20:57 15 MS. GONZÁLEZ: Thank you. I'm glad that
16 you will find the opportunity to ask questions both to
17 Mr. Castro and Mr. Herrera.

18 PRESIDENT: In terms of speed, is this
19 appropriate or too fast?

03:21:22 20 MS. GONZÁLEZ: Thank you for the
21 interruption because that's exactly the point where I
22 need to switch to another point.

23 Despite being overwhelmed with the civil
24 strife, the local police did all that it could to help
03:21:33 25 INAGROSA.

03:21:34 1 On June 17, 2018, that is one day after
2 INAGROSA notified the police of the invasions,
3 Sub-Commissioner William Herrera visited the Hacienda to
4 assess the situation. Once he confirmed that there were
03:21:46 5 hundreds of armed invaders in the property, he implored
6 INAGROSA to have its security guards evacuate the
7 premises immediately to protect them. And when they
8 refused, he confiscated their weapons to make sure they
9 could not be taken by the invaders.

03:22:05 10 This is a point of contention between the
11 parties. Riverside claims that this confiscation meant
12 that the police were supporting the invaders, but that
13 is exactly the contrary. The allegation at that time
14 was that the invaders were stealing the guns in the
03:22:19 15 Hacienda, so Mr. Herrera rightfully took the remaining
16 weapons in the Hacienda to ensure that they did not fall
17 into the hands of the invaders and to prevent some sort
18 of shoot-out between the hundreds of invaders and the
19 handful of security guards.

03:22:37 20 At that point, the police --
21 MR. APPLETON: Excuse me. I'm sorry. We
22 have to object again. None of this is on the record.
23 The President has asked you to refer to materials on the
24 record. This is all material that is not --

03:22:49 25 MS. GONZÁLEZ: It's --

03:22:51 1 MR. APPLETON: No, it's not. In fact,
2 it's not. So if you would like to go figure this out,
3 we have no objection of course to you referring to the
4 record. If you're referring to the record, take us to
03:23:01 5 the record. But if you're not going to go to the record
6 that's a problem and we don't want to interrupt
7 whatsoever. I simply want to make sure that we're
8 getting clear information as we go ahead.

9 MS. GONZÁLEZ: We're happy to provide
03:23:19 10 later exactly where in the record this is.

11 MR. APPLETON: I'd want you to deal with
12 it on the record if you are going to address it --

13 PRESIDENT: Mr. Appleton, there are many
14 allegations also in the written submissions that is not
03:23:29 15 supported by any evidence on the record. So let's go
16 on, but keep in mind that the Tribunal will be more
17 easily convinced if you demonstrate your argument by
18 supporting evidence.

19 MS. GONZÁLEZ: Yes. Thank you,
03:23:42 20 Mr. President. We've been submitting and showing a lot
21 of evidence here in the PowerPoint and Mr. Appleton --
22 actually I didn't interrupt you, so please show me the
23 same courtesy you would have shown to Mr. Reichler.
24 Thank you so much again.

03:23:57 25 So at that point the police did not have

03:23:59 1 any resources to undertake hundreds of armed invaders,
2 and the only solution at the time was to deescalate the
3 situation and attempt diplomacy until the police had
4 more access to resources from Managua or some other city
03:24:15 5 in compliance with the shelter order.

6 Over the following weeks, as the protests
7 were still ongoing, the police kept regular tabs on the
8 Hacienda and attempted on several occasions to speak
9 with the leaders of the invaders to implore them to
03:24:27 10 leave.

11 After the protests subsided in
12 August 2018, the police was able to allocate more and
13 more resources to these important efforts.
14 Specifically, they employed the services of Commissioner
03:24:42 15 Castro and the Mayor of Jinotega, both of whom
16 personally traveled to Hacienda Santa Fé and negotiated
17 a peaceful eviction of the invaders, which happened
18 around August 13, 2018. And that's the magic day.

19 Claimant has been trying to hide that
03:24:59 20 date. They didn't even mention that on August 13th, the
21 Hacienda was free of squatters. That's right.
22 Six weeks after the invasion, the Nicaraguan government
23 completely got rid of the Hacienda of any and all
24 invaders. And by the way, this fact is undisputed.

03:25:22 25 Riverside acknowledges that the police got all of the

03:25:24 1 invaders out of the Hacienda.

2 What you have here on the screen is a
3 public document. It's a document signed before a notary
4 public in Nicaragua, signed by both commissioner --

03:25:42 5 Sub-Commissioner Herrera and Mr. Luis Gutierrez on
6 August 14, the day after -- as you can see there, the
7 day after all the squatters were evicted from the
8 property. And on such record is the inventory that the
9 police took along with an INAGROSA representative on

03:26:05 10 August 14 which, among other things, confirms that the
11 government got the invaders out and recognized that they
12 had been there unlawfully.

13 "From Saturday June 16 to Monday August 13
14 of this year, violently invaded and trespassed on
03:26:21 15 Hacienda Santa Fé, which they later vacated as a result
16 of the operations carried out by the Jinotega Department
17 National Police."

18 That is signed by Mr. Luis Gutiérrez.

19 That's one of the reasons that Riverside's
03:26:39 20 claim that Nicaragua was responsible for or sympathetic
21 to the invasion of Hacienda Santa Fé is so ridiculous.
22 The undisputed record confirms that Nicaragua evicted
23 hundreds of armed invaders without blood in less than
24 two months.

03:26:54 25 Compare that, for example, with the

03:26:55 1 four-year period that it took Nicaragua to evict those
2 same invaders back in the early 2000s. Nicaragua should
3 be praised for its speed in removing the invaders,
4 particularly given that unprecedented civil strife that
03:27:10 5 coincided with this invasion.

6 For Riverside to take these undisputed
7 facts and somehow distort them into a story of a taking
8 from the government is fanciful and in bad faith.

9 You would think that after experiencing
03:27:26 10 this type of invasion, that INAGROSA and Riverside would
11 have done everything they could to mobilize resources to
12 the Hacienda in order to secure it from future invasion.

13 That's not what happened. Just like with
14 the invasion in the '90s and in 2017, INAGROSA and
03:27:42 15 Riverside all but abandoned the Hacienda Santa Fé. The
16 Rondón family was in the US. The INAGROSA employees and
17 guards left the area. The Hacienda was, once again,
18 totally empty.

19 Unsurprisingly, on or around August 18,
03:28:04 20 the resentful members of the Cooperativa El Pavón
21 invaded the Hacienda a third time.

22 So they evicted them on August 13. On
23 August 14 they signed the public document showing, which
24 actually acknowledges that they had evicted all the
03:28:24 25 people. Nobody remained at the property. Some days

03:28:27 1 later these people again considered this their homes.
2 If there's nobody there, they could come back. And
3 that's what they did. They went back.

4 This time, however, there were no INAGROSA
03:28:38 5 employees on the premises and INAGROSA and Riverside did
6 not even ask the government to take back the property.

7 El Pavón Cooperative members started
8 writing to the government and claiming a solution, and
9 since that point, Nicaragua was effectively left by
03:28:56 10 itself to do something about these invaders.

11 Around September 2018, the government
12 stated very clearly that it could not tolerate illegal
13 invasions. That was the government policy in the '90s
14 and in 2018. Again, that was the policy of the
03:29:16 15 government. We will not tolerate illegal invasions.

16 And what did the government did this time?
17 Again, tried to help relocate the settlers, again for
18 the third time.

19 The Nicaraguan government endeavored to
03:29:34 20 evict the invaders and this time, however, they wanted
21 to ensure that the invaders would not return. And the
22 only way to do that was to ensure that the invaders
23 could get relocated to a government-owned property.
24 Because otherwise they would just keep coming back.

03:29:51 25 So the government embarked on a multi-year

03:29:53 1 process, similar to the multi-year process they
2 undertook in the early 2000s, to evict these invaders
3 peacefully and relocate them and their families. We are
4 now talking about 600 people. The government knew that
03:30:09 5 in order to make sure that they don't come back, we have
6 to offer them similar conditions to El Pavón where they
7 can plant their crops and convince them to evict
8 voluntarily. So finding a substitute location may also
9 take time. Again, now we are talking about more people
03:30:27 10 than in the 2000s.

11 Let's assume that they -- but let's assume
12 that they had an army and that they took them away
13 without offering a solution. So let's assume that
14 instead of seven people the police have gone there and
03:30:42 15 take them all out, what would have been the result? For
16 sure they would have come back because those were their
17 homes. If you don't ensure to relocate them offering --
18 that was their homes. Again, offering a solution, that
19 is not something that you can do one day from another.

03:31:01 20 So the government didn't get to have any
21 blood. They wanted to have this in a peaceful way, and
22 that required a dialogue to convince these people to
23 evict and not come back.

24 This arduous process is captured by the
03:31:19 25 testimony of Ms. Diana Gutiérrez, a member of the

03:31:22 1 Attorney General's office, who was involved in the
2 eviction and relocation efforts and who will appear
3 before you during these hearings. These efforts are
4 memorialized in this arbitration record, and this slide
03:31:34 5 contains some of the pictures of the negotiations
6 between the commission and the invaders.

7 The government created a multidisciplinary
8 commission to oversee the process and the committee's
9 terms to the invaders were clear. Those who complied
03:31:49 10 with the commission and left the Hacienda in a peaceful
11 and orderly manner would get relocated. And those who
12 resisted would get sent to prison.

13 Almost all of the invaders agreed to the
14 terms, provided that they could be relocated after the
03:32:03 15 crops they had planted at the Hacienda could be picked.

16 In May 2021, the Jinotega Attorney
17 General's office signed minutes with the squatters
18 setting the terms of the relocations, where they
19 agreed -- you can see it here -- "not to return to the
03:32:21 20 Santa Fé estate nor to take over any other property not
21 assigned by the State of Nicaragua."

22 By early 2021, almost all of the invaders
23 had been evicted from the Hacienda and relocated. Those
24 who held out were given one final opportunity to leave
03:32:38 25 on peaceful terms. They were served with summons that

03:32:43 1 threatened prison time if they did not abide.

2 A final meeting between the commission and
3 the remaining invaders was held in May 2021, where all
4 the invaders agreed to leave the premises. And by
03:32:58 5 August 2021, almost exactly three years since the
6 government succeeded in evicting the invaders from the
7 Hacienda Santa Fé, only to see the Hacienda reinvaded by
8 the same invaders due to INAGROSA'S and Riverside's
9 negligence, the government succeeded in removing every
03:33:18 10 invader from the premises after a time.

11 All the invaders were relocated except for
12 one invader who was imprisoned due to his refusal to
13 leave.

14 All the while, INAGROSA and Riverside had
03:33:33 15 gone totally silent. They showed no interest in
16 learning about the status of the Hacienda Santa Fé.

17 So the Hacienda Santa Fé is free of
18 squatters. Where are the owners? Nowhere to be seen.
19 In September 2021, Nicaragua's lawyer sent Riverside's
03:33:51 20 lawyer a letter advising that the Hacienda was, once
21 again, rid of invaders and offering to turn over the
22 Hacienda to INAGROSA as soon as practicable.

23 You've heard today, and throughout this
24 arbitration, that the lawyers for Riverside claim that
03:34:08 25 this was not a bone fide offer, pointing to the last

03:34:13 1 paragraph you see on the screen, that there were
2 preconditions for the turnover of the Hacienda on
3 Riverside or INAGROSA demonstrating the ownership of the
4 property.

03:34:24 5 But the main purpose behind the condition
6 was that the government had not heard from either
7 Riverside nor INAGROSA in years, so it was not clear
8 that these entities had retained ownership of the
9 Hacienda Santa Fé.

03:34:38 10 And in any event, the conspiracy theory
11 that Nicaragua wanted to keep the property makes no
12 sense because, if that were the case, there would have
13 been absolutely no need to send this letter in the first
14 place. Ultimately, and as this Tribunal knows, neither
03:34:58 15 Riverside nor INAGROSA indicated any willingness to take
16 back the Hacienda.

17 I will now turn to phase No. 5 on the
18 slide.

19 Because neither Riverside nor INAGROSA
03:35:13 20 took back the Hacienda, the government was again in
21 another dilemma. If it did nothing, the abandoned
22 Hacienda would surely be invaded another time, which
23 would have required Nicaragua to spend even more time
24 and efforts ridding it of invaders and this vicious
03:35:36 25 cycle would have repeated itself.

03:35:38 1 So based on prior experiences that if they
2 did not act quickly, the invaders were going to go back,
3 the government hired private security in September 2021,
4 as you are well aware.

03:35:51 5 The government also undertook to protect
6 the Hacienda from invasions by securing its perimeter.
7 To do this, however, the government needed a court order
8 that implemented the government as a judicial depository
9 which would allow the government to take reasonable
03:36:07 10 actions to conserve and protect the property.

11 So in December 2021, this petition was
12 approved and Nicaragua was installed as judicial
13 depository for the purpose of protecting the Hacienda.
14 We refer to this order as the protective order.

03:36:27 15 The Tribunal knows this timeline fairly
16 well because it was the subject of Procedural Order
17 No. 4. This Tribunal has already found that the
18 protective order in no way expropriated the Hacienda as
19 Riverside claims but, rather, serves to protect the
03:36:47 20 Hacienda through the pendency of this arbitration and
21 was not -- and the Tribunal also recognizes that it was
22 not an embargo of the property.

23 As I mentioned earlier in my presentation,
24 Nicaragua has never claimed that the Hacienda belonged
03:37:02 25 to the State. Riverside got this wrong, and their

03:37:07 1 allegations about the protective measure shows a deep
2 ignorance of Nicaraguan law. This will be explained by
3 Nicaraguan law expert, Mr. Byron Sequeira.

4 So after the government was able to
03:37:18 5 peacefully evict and relocate the members of the
6 El Pavón cooperative, Nicaragua has invited Riverside
7 and INAGROSA to take back possession of the Hacienda on
8 several occasions. And each time they have refused,
9 citing their conspiracy theory that this is some sort of
03:37:37 10 trap.

11 This February, Nicaragua had to renew the
12 judicial depository measure because it was about to
13 expire, but before doing so it gave Riverside and
14 INAGROSA notice in case they wanted to object. They
03:37:57 15 chose not to. The court granted renewal. By the way,
16 according to the Nicaraguan procedural code, during the
17 pendency of either the first or second provisional
18 measure, Riverside could have interrupted and request
19 the Hacienda back. They didn't do so.

03:38:13 20 Nicaragua continues to pay a private
21 security outfit to protect the perimeter of the Hacienda
22 and the bill continues to rise.

23 As you heard this morning, Riverside has
24 now shifted the bulk of this case to argue that
03:38:26 25 Nicaragua took title of the Hacienda through the

03:38:29 1 protective order. You've heard Riverside's lawyers tell
2 you today that Nicaragua has gone through all this
3 effort to pretend to want to give the Hacienda back but
4 that, in reality, Nicaragua just wants to keep the
03:38:44 5 Hacienda to itself.

6 Well, my client representative is not here
7 yet, but I can assure you that he and the rest of the
8 Nicaraguan government wants nothing else than for
9 Riverside and INAGROSA to take back the Hacienda. So
03:39:03 10 yet again, we ask to please go back and take the
11 Hacienda. It's all yours.

12 If the Hacienda was truly this magical
13 property that had the perfect conditions for cultivating
14 one of the world's most lucrative crops, why couldn't
03:39:20 15 you think that Riverside -- wouldn't you think that
16 Riverside and INAGROSA would be clamoring to return to
17 the Hacienda?

18 The Tribunal needs to be asking itself why
19 doesn't INAGROSA and Riverside want to take back their
03:39:33 20 Hacienda Santa Fé, after five times that we have offered
21 the Hacienda back?

22 We submit, members of the Tribunal, that
23 the answer is simple. The allegations about the avocado
24 business are a sham. The Hacienda was, at its best, a
03:39:47 25 middle of the road coffee plantation. And ever since

03:39:50 1 the coffee plantation was ruined by the Roya fungus, no
2 one except the members of El Pavón cooperative seems to
3 want anything to do with this piece of property.

4 I finally turn briefly to respond directly
03:40:07 5 to the unfounded claims you heard today about the
6 invasions of the Hacienda Santa Fé.

7 One of the ways to know a story is not
8 true is when the story keeps shifting and the
9 storyteller learns of evidence that discredits his or
03:40:21 10 her story. That's exactly what has happened here.

11 In its first Memorial, Riverside went all
12 in on the theory of invaders were paramilitaries engaged
13 by the Nicaraguan government. But after Nicaragua
14 presented evidence that proves that the invaders were
03:40:39 15 actually demobilized ex-members of the Resistencia
16 Nicaragüense, who were now members of a private farming
17 cooperative, Riverside changed course.

18 Now Riverside has walked back its theory
19 about paramilitaries and instead argues that this
03:40:59 20 cooperative was somehow co-opted by the government and
21 re-purposed for the sole reason of taking the Hacienda
22 Santa Fé.

23 Whatever its theory, I want to explain to
24 you why the claim that Nicaragua was behind this
03:41:12 25 invasion of Hacienda Santa Fé is unfounded and

03:41:15 1 nonsensical.

2 First, it is based entirely on hearsay
3 testimony. As you all know, hearsay testimony is
4 testimony that is not based on the witness's personal
03:41:30 5 knowledge but, rather, on another party's unsworn
6 statement.

7 There are two issues with this type of
8 testimony. First, because the person who originally
9 made that statement is not testifying under oath, it
03:41:43 10 cannot be presumed to be true. Second, people who
11 repeat what they think they heard someone else say,
12 oftentimes get it wrong.

13 This phenomenon is best captured by the
14 kids' game of telephone, where one person tells another
03:42:00 15 person something that that person repeats that message
16 to someone else and so on. And by the time it gets to
17 the final person, the message is virtually
18 unrecognizable from the original message.

19 This unreliable hearsay testimony is the
03:42:16 20 backbone to Claimant's case. Indeed, Riverside has
21 several witnesses who have testified that they or
22 someone else they talked to might have heard the
23 invaders say that they were sent by the government.

24 Mr. Carlos Rondón, for example, he was not
03:42:35 25 even in Nicaragua during the invasion, yet he testifies

03:42:37 1 that he thinks the government sent the invaders because
2 he heard that from someone who, in turn, heard it from
3 someone else, who in turn heard it from the invaders.
4 That's called triple hearsay, and it is as unreliable as
03:42:53 5 testimony as it can get.

6 Next, you have Mr. Luis Gutiérrez. Again,
7 he was not at the Hacienda when the invasion happened.
8 Yet, Riverside uses his testimony to support its
9 attribution theory because Mr. Gutiérrez says he heard
03:43:12 10 one of INAGROSA'S guards tell him that the guard heard
11 an invader say that the government sent him. That's
12 double hearsay.

13 And finally you have the testimony of
14 Mr. Domingo Ferrufino, who actually was at the Hacienda
03:43:29 15 during the time of the invasion. His testimony that the
16 government sent the invaders is hearsay because he is
17 repeating what he supposedly heard an invader say to him
18 during the invasion. It is still unreliable because he
19 cannot attest to the truth of what the invader
03:43:45 20 supposedly said to him.

21 Second, there is no documentary evidence
22 to support the hearsay statements. As noted before, the
23 invaders were not government agents but, rather,
24 demobilized members of the group that fought against the
03:44:02 25 government. And they were not paramilitaries. They

03:44:05 1 were farmers and members of a local cooperative. Many
2 of them consisted of women and children.

3 We covered that earlier with the
4 documented history of the invasions in the '90s and the
03:44:18 5 early 2000s which supports the testimony of Mr. López
6 that the invaders were not government agents but,
7 rather, members of Cooperativa El Pavón. That's proof
8 of the contemporaneous evidence that I showed earlier.

9 So what documentary evidence does Claimant
03:44:36 10 cite? Well, as you saw this morning, they rely on a
11 letter from some of the invaders to the government for
12 the proposition that the invaders admitted that they
13 took over the Hacienda for the benefit of the
14 government. But they are cherry-picking that document.
03:44:54 15 In reality, that document to which I also referred
16 earlier, in reality merely states that certain of the
17 invaders allied themselves politically with the ruling
18 government. That's it.

19 And when you read the entire letter,
03:45:12 20 you'll see that it just supports Mr. López's testimony
21 that the invaders used to live in the Hacienda in the
22 '90s and they carried out this most recent invasion to
23 take back the land they thought was theirs.

24 They also rely on a letter sent by
03:45:29 25 Commissioner Marvin Castro from July 2018 that provides

03:45:33 1 that they heard a rumor that one of the congressmen
2 asked the invaders to stay at the Hacienda.

3 That is not surprising given that INAGROSA
4 and the Rondón family was not popular in the area and
03:45:44 5 most of the locals supported the efforts of
6 Cooperativa El Pavón.

7 But that doesn't mean that the Nicaraguan
8 government ordered the invasion. This is just one of
9 the many examples where Claimant misstates and
03:45:56 10 mischaracterizes what the record actually shows.

11 Mr. President, please, Claimant has not
12 met its burden of proof and for that reason, I finish as
13 I started this morning.

14 We should not be here today.

03:46:15 15 Thank you, Mr. President. We can go to a
16 seven-minute break.

17 PRESIDENT: Just a second, Ms. González,
18 before we finish. Any questions from my colleagues?

19 I would have one question, which goes back
03:46:32 20 to the first part of the factual background that you
21 were explaining, the first phase from the 1990s until
22 2003-4, this land-for-guns deal in 1990.

23 MS. GONZÁLEZ: Yes.

24 PRESIDENT: Between the administration of
03:46:56 25 President Chamorro and the former members of the

03:47:00 1 resistance, the Contras.

2 MS. GONZÁLEZ: Yes.

3 PRESIDENT: As I understand it, the deal
4 was that land would be given, either state land or
03:47:11 5 private land -- if it's private land -- based on
6 negotiations between the owners of the land and the
7 members of the resistance and the government. And I'm
8 asking this question on the basis of the evidence on the
9 record. I'm not sure I have seen any, but you may know
03:47:32 10 this better and I'm sure you do.

11 What happened in these negotiations
12 between the administration of President Chamorro and the
13 private owners of the land, including the Rondón family,
14 in relation to the Cooperativa El Pavón?

03:47:55 15 Were there any negotiations between the
16 owners of the land and the administration for transfer
17 of ownership of that kind during the period from 1990
18 until 2004?

19 MS. GONZÁLEZ: Thank you, Mr. President.
03:48:11 20 So as I mentioned earlier, in the '90s, in November, I
21 think 1990, is where this commission actually assigned
22 this land -- or identified this land as a potential land
23 for members of the resistance. But at that time
24 simultaneously it was in August of 1990 that the Rondón
03:48:33 25 family acquired this property. So at that time it was,

03:48:41 1 you know, possibly not clear who were the owners of the
2 property and since it was a property that was so big.
3 And, as you will hear from Ms. Diana Gutiérrez, that she
4 will explain how they kept their records at that time,
03:48:57 5 potentially it was always the intention to negotiate
6 with any -- they identified this property as in a
7 potential state of abandonment because they didn't see
8 anyone right there at that point perhaps because the
9 property had just been acquired by Ana Lorena Rondón.

03:49:21 10 But I understand that there were
11 negotiations. The ones I've seen in the record are
12 later on in the 2000s where Mr. Rondón asked the
13 government to negotiate, between 2000 and 2003,
14 negotiate with the land occupiers. The intention of the
03:49:45 15 government to negotiate is shown in several letters,
16 maybe not directly with Mr. Rondón until the '90s --
17 until 2000 -- because it is only then when he asked can
18 these people get out for a decade, they tolerated these
19 people.

03:50:08 20 But as soon as he requested I need these
21 people out, the government -- if you check Exhibit R-177
22 between 2000 and 2003, you will see an enormous amount
23 of correspondence between the different entities -- the
24 government -- and in the letters that the
03:50:29 25 Cooperativa El Pavón was sending to the government and

03:50:31 1 also in the letters that Mr. Rondón was exchanging with
2 the government about these negotiations and this process
3 that needed to go on.

4 PRESIDENT: We have seen the
03:50:47 5 correspondence that the letter states when the court
6 proceedings had already been concluded, but what I have
7 in mind was the negotiations in the course of the 1990s.
8 It would be helpful if the parties could provide the
9 Tribunal with the list of exhibits relating to those
03:51:02 10 negotiations. That would be helpful.

11 MS. GONZÁLEZ: Perfect. We'll check and
12 we will get back to you on that one, Mr. President.

13 PRESIDENT: Thank you very much. We'll
14 break for seven minutes until 15:58.

03:51:17 15 MS. GONZÁLEZ: I'm sorry. Ms. Conover,
16 could you please tell me how much time I've used,
17 please.

18 MS. CONOVER: Yes. The Respondent has
19 used so far one hour and 14 minutes. We stopped the
03:51:30 20 clock during the questions.

21 MS. GONZÁLEZ: Thank you.

22 *(Recess taken)*

23 PRESIDENT: Okay. We go on. It will
24 Mr. Ramos-Mrosofsky, I believe.

04:03:20 25 MR. RAMOS-MROSOFSKY: Thank you,

04:03:20 1 Mr. President. Thank you, members of the Tribunal.
2 Good afternoon. It falls to me to address Nicaragua's
3 defenses on the merits.

4 Nicaragua finds itself in the curious
04:03:31 5 position of having to defend against at least two
6 somewhat incompatible or inconsistent theories. But of
7 course we are the Respondent. We're going to address
8 them all.

9 I would jump ahead -- here we are. We've
04:03:46 10 skipped a couple of slides in the interest of time from
11 the deck you've been given, this should be slide 77.
12 This is a bit of a roadmap to my presentation.

13 Our defenses fall into three categories.
14 The first, as Ms. González has begun to cover at some
04:04:03 15 length, are Nicaragua's defenses to Riverside's original
16 paramilitary invasion case, the direct expropriation
17 case, which although perhaps inconsistent with the case
18 advanced after the Reply has not been withdrawn and was
19 revisited today. These defenses are largely factual.

04:04:20 20 We have two sets of defenses, what I would
21 term Riverside's revised post Reply case. These include
22 what I would call absolute or preemptive defenses which
23 are advanced under unique provisions of the DR-CAFTA,
24 specifically articles 21.2(b) and 10.6 that outright
04:04:40 25 preclude liability where Nicaragua took the measures at

04:04:43 1 issue in response to an armed incursion on the Hacienda
2 Santa Fé at a time of nationwide civil strife.

3 And the third category, the third bucket
4 of defenses, are those under the specific DR-CAFTA
04:05:00 5 provisions that Riverside especially post reply alleges
6 Nicaragua breached, assuming that is the Tribunal were
7 actually going to reach those claims, notwithstanding
8 article 21.2(b) and article 10.6.

9 I'll address these in sequence. I'll
04:05:13 10 begin with the paramilitary invasion narrative. But
11 since Ms. González has covered quite a bit of it
12 already, and we are conscious of time, I'm going to jump
13 ahead just a little bit. If we could have a couple more
14 slides. One more. Sorry.

04:05:40 15 So we have seen Riverside's case addressed
16 hearsay, but there's been a great deal of effort put on
17 the letter of September 4, 2018, which we discussed a
18 little while ago in Ms. González's presentation.

19 But there was an earlier letter which
04:05:54 20 makes Riverside's theory of attribution make even less
21 sense. This is a letter that you see on the slide from
22 June 5, 2018. It is Respondent's Exhibit 64. This
23 letter was sent mere days before the invasion of
24 Hacienda Santa Fé; and in this earlier June letter,
04:06:14 25 representatives of the El Pavón farmers cooperative

04:06:17 1 asked for the government's support for their claim to
2 the Hacienda. They complained about having previously
3 been brutally evicted at the request of the Rondón
4 family and stated their belief -- their belief -- that
04:06:29 5 their rights to the property were "acquired under peace
6 agreements" signed between the government of Nicaragua
7 and the former resistance.

8 This letter confirms that the leaders of
9 the El Pavón cooperative, these hundreds of farmers,
04:06:43 10 armed individuals who entered the property, did not
11 understand themselves to be acting on government orders
12 but were, instead, as we saw in a subsequent letter
13 discussed earlier, soliciting government support for
14 their claims. Support which they did not receive.

04:07:01 15 I'd also add that this letter makes the
16 broader stakes, the deeper stakes for Nicaragua's
17 essential security quite clear. We were told in the
18 Claimant's presentation that Nicaragua couldn't anchor
19 an essential security defense in avocado farming. The
04:07:17 20 issue here isn't avocados. It's peace agreements. It
21 says so in the letter.

22 This is why this land incursion, why this
23 squatting by these armed individuals was so sensitive,
24 because many of the individuals invading this property
04:07:32 25 were former Contra fighters who believed that their

04:07:35 1 claims were rooted in the peace settlement that ended a
2 decade-long civil war.

3 So I wanted to raise this particular
4 letter, both these pieces of correspondence from the
04:07:46 5 El Pavón cooperative members to the Nicaraguan
6 government. They're our exhibits. We put them before
7 you. We're happy that they're before you, and we urge
8 you to pay careful attention to them when examining
9 questions of attribution.

04:07:57 10 I would like to turn next to the issue of
11 Congressman Edwin Castro and his alleged sympathy for
12 the illegal occupiers of the Hacienda as well as this
13 internal report in which the commissioner of police in
14 Jinotega, Marvin Castro, no relation to Congressman
04:08:19 15 Castro -- there are a lot of Castros and Gutiérrezes in
16 this case -- advised the deputy chief of the National
17 Police that unidentified occupiers had told him that
18 Congressman Castro had allegedly encouraged them to stay
19 on the Hacienda in hopes that the government might buy
04:08:34 20 the land.

21 In that same report, as you can see on the
22 slide, the police commissioner warned that the armed
23 unlawful occupiers had also said they were prepared to
24 fight for the land. These, of course, were individuals
04:08:46 25 many of whom were demobilized former fighter from the

04:08:49 1 civil war. That's a serious piece of information.
2 Now it's all hearsay.
3 If we turn to the next slide, Police
4 Commissioner Castro made very clear in his witness
04:09:01 5 statement, which we've reproduced here, that he wasn't
6 vouching for the truth of what was said. He was
7 reporting up his chain of command what he had been told.
8 Indeed, not even the Claimant has
9 suggested that the government actually sought to
04:09:13 10 purchase the land for the occupiers. The record is
11 clear, as Ms. González walked the Tribunal through, that
12 what the government did was reject their claim of any
13 right to the land and removed them peacefully.
14 Turning back to Congressman Castro, let's
04:09:30 15 assume just for the moment that he was sympathetic, or
16 may have been, to the individuals who occupied Hacienda
17 Santa Fé or perhaps that he even encouraged them. What
18 would that mean?
19 Even if that were the case, and we're not
04:09:46 20 saying that it was, we're saying let's assume it was, it
21 would not convert this private armed land invasion into
22 an act of State for the very simple reason that
23 Congressman Castro is not the State. His opinions, his
24 advocacy, even his political advice in themselves do not
04:10:05 25 engage Nicaragua's international responsibility.

04:10:08 1 Nor, crucially, is Congressman Castro in
2 himself an organ of the State as Claimant suggested.
3 Congressman Castro is one of 90 members of the National
4 Assembly of Nicaragua and it is that National Assembly
04:10:23 5 that is a constitutionally defined organ of the
6 Nicaraguan State, that acting in its constitutional role
7 could conceivable engage Nicaragua's State
8 responsibility, for example, if it had passed a law
9 expropriating the Hacienda. It didn't, but that would
04:10:39 10 have been a way in which, as a member of a collective
11 legislative body, there could have been State
12 responsibility.

13 The fact that Congressman Castro may be a
14 spokesman for a political party is immaterial to State
04:10:54 15 attribution. There's been no showing whatever that the
16 two are the same. But the political advocacy, just
17 jumping back -- this comment about the word "person" in
18 the relevant article -- I think it was article 4 of the
19 ILC Articles on State Responsibility, it's absolutely
04:11:13 20 true that a person could be an organ of the State and an
21 individual person's activity could create State
22 responsibility.

23 If Congressman Castro were instead a king
24 of Nicaragua or the president of Nicaragua, his
04:11:32 25 individualized actions might have given rise to State

04:11:36 1 responsibility. But there's been no actual showing that
2 he's part of the executive branch in any way and
3 certainly an individual member of an elected
4 representative body speaking for himself, sharing his
04:11:46 5 opinions -- if he did -- would not be a source or a
6 basis for attribution.

7 And nor could it be, because as tribunals
8 have repeatedly recognized, politicians, especially
9 elected representatives, say and propose and debate all
04:12:02 10 sorts of extraordinary and problematic and contradictory
11 things. That's the nature of elected representatives.
12 Their statements without something more don't bind the
13 State under international law or typically under a
14 state's own law unless and until the legislature of
04:12:19 15 which they're a part takes some action pursuant to its
16 constitutional mechanism.

17 So if we see on the slide here, there's
18 some citations from relevant authorities, the *Lidercón v*
19 *Peru* case, where a very distinguished tribunal was
04:12:37 20 careful to draw a sharp distinction between the actions
21 of a legislature and the opinions, in that case
22 expressed in the legislature, of particular legislators.

23 But we are here two miles away from the
24 United States Congress, and I'd submit that relatively
04:12:51 25 little imagination is needed to see why this is a sound

04:12:54 1 rule and how the alternative would be chaos.

2 We also heard quite a bit about Professor
3 Wolfe's report as an ostensible basis for characterizing
4 the events at Hacienda Santa Fé. We're not afraid of
04:13:10 5 Professor Wolfe's report. The reason Professor Wolfe is
6 not here, the reason we didn't call him for
7 cross-examination, is that his report says absolutely
8 nothing about the specific events at Hacienda Santa Fé
9 involving a specific farming cooperative and a specific
04:13:26 10 dispute to a particular piece of land.

11 Professor Wolfe has every right to his
12 views with which the Government of Nicaragua
13 unsurprisingly doesn't agree about Nicaraguan politics
14 and history, but the purpose of this arbitration is to
04:13:41 15 resolve a dispute about a particular investment on
16 particular facts, not to have a sort of seminar on
17 Nicaraguan politics or history.

18 Professor Wolfe may have a view about how
19 different factions in Nicaraguan political life have
04:13:58 20 adjusted to one another and they have interacted
21 following the peace agreements that ended the Nicaraguan
22 civil war, but I think it's safe to say that the armed
23 individuals who invaded the Hacienda Santa Fé to create
24 small farming plots for themselves and their families
04:14:14 25 were not forming a coalition government.

04:14:18 1 And the issue with Professor Wolfe's
2 report is it's simply not material to the issues before
3 you. This is not a political body. This is not a human
4 rights body. This isn't the OAS. There are other
04:14:29 5 forums for those sorts of issues to be raised. This
6 isn't one of them. We are concerned with what happened
7 to this particular investment in a particular, very
8 factually defined context.

9 Now, in short then, the invasion of
04:14:45 10 Hacienda Santa Fé was illegal private conduct. Hacienda
11 Santa Fé, as Ms. González repeated, has always been the
12 property of INAGROSA and indirectly of Riverside.
13 Nicaragua has never condoned the illegal invasion by
14 private individuals of this property and, indeed, it was
04:15:00 15 through the diligent efforts of Nicaraguan authorities
16 that these individuals were removed repeatedly from the
17 property without any bloodshed.

18 And it's because Nicaragua respects
19 INAGROSA'S rights to this land that we have seen
04:15:16 20 repeated efforts, ignored by the investor, to return
21 this property to its custody and why Nicaragua has no
22 choice at present but to continue to spend public funds
23 to safeguard the property until INAGROSA or Riverside
24 hopefully resume possession. At all times Nicaragua's
04:15:36 25 preferred outcome.

04:15:36 1 That could be the end of the story,
2 members of the Tribunal, except for the fact that
3 Riverside of course dramatically changed its case in
4 Reply. And it's to that revised case that I turn now.

04:15:54 5 The second case is based on a critique of
6 Nicaragua's response to the illegal private invasion of
7 Hacienda Santa Fé.

8 Riverside claims variously that there was
9 an expropriation arising from the judicial order and
04:16:07 10 that Nicaragua should have adopted other or more
11 forceful approaches at its disposal to address the
12 invasion, such as using specialized police teams and the
13 military if necessary.

14 These claims fail on the merits, as I will
04:16:21 15 discuss, but even before we reach the merits, two
16 provisions of DR-CAFTA bar Riverside's claims outright.

17 The first is in the exceptions chapter,
18 chapter 21 of DR-CAFTA. Article 21.2(b), the
19 self-judging essential security clause.

04:16:40 20 The second, which I'll come to afterwards,
21 is article 10.6, the civil strife and war clause found
22 in the investment chapter of DR-CAFTA.

23 Either of these provisions suffice for the
24 Tribunal to dispose of Claimant's revised case, its
04:16:57 25 response-based post Reply case on the merits entirely.

04:17:01 1 I'll address article 21.2(b) first, which we can see on
2 the next slide.

3 In pertinent part, this provision provides
4 that "nothing in this agreement shall be construed to
04:17:15 5 preclude a party from applying measures that it
6 considers necessary -- that it considers necessary --
7 for the protection of its own essential security
8 interests."

9 That this is a self-judging clause follows
04:17:28 10 from a plain reading of the treaty's text itself. No
11 other interpretative device is needed, for words as
12 written mean what they say and they say what they mean.
13 It is for the State to determine the measures it
14 considers necessary for the protection of its own
04:17:44 15 essential security interest. That's what happened here.

16 In the context of a land dispute rooted in
17 the peace settlement ending in an extremely bloody
18 decade-long civil war that cost 40,000, 50,000 lives,
19 nobody really knows, and lasted a decade in a country
04:18:04 20 with a population of 6 million people, Nicaragua had an
21 enormously important interest in preserving that peace
22 settlement and preserving the fact that the war was
23 over. Of course that interest would have been more
24 acute in some ways at a time of widespread civil
04:18:20 25 violence.

04:18:21 1 And DR-CAFTA, in article 21.2(b),
2 affirmatively protects Nicaragua's sovereign decisions
3 to pursue a successful strategy -- I should add a
4 successful strategy of de-escalation and dialogue that
04:18:35 5 it considered necessary to resolve the dispute in
6 Hacienda Santa Fé. Again, the plain text of article
7 21.2(b) should dispose of Claimant's post Reply case.

8 But if the Tribunal were minded to look
9 more deeply at the history and policy behind this
04:18:52 10 language, the result would be the same.

11 If we can go to the next slide, please.

12 Professor Burke-White --

13 PRESIDENT: Before we go to the language
14 of the provision, what are the -- because the provision
04:19:05 15 covers measures necessary, what are the measures that
16 the Respondent is specifically invoking as falling under
17 this provision?

18 MR. RAMOS-MROSOVSKY: Yes, Mr. President.
19 Thank you for the question.

04:19:18 20 The measures here would cover the response
21 to the invasion of Santa Fé and its occupation broadly,
22 but particularly would cover the State's decision to
23 respond in the particular way that it did.

24 There is obviously a question of resource
04:19:38 25 allocation at a time of nationwide civil unrest; but

04:19:43 1 there's also a question of what kind of response to
2 mount to the occupation. And we have heard from
3 Claimant that there should have been a more forceful
4 response, a military response perhaps, and so one of the
04:19:56 5 points -- and I'll certainly come to this more -- one of
6 the points we would argue is the State had a right, an
7 absolute right protected by article 21.2(b), to choose a
8 de-escalatory response, to use a peaceful approach to
9 resettle people through dialogue rather than to force
04:20:14 10 them off the property again and burn their houses down
11 as happened in 2004.

12 So there's both a resource allocation
13 point but there's also a methods point. Both of them I
14 think are at stake on the facts here. Certainly the
04:20:33 15 essential security interest has roots both in the
16 historical conflict, in its settlement, and in the
17 disruptions, the disorders in Nicaragua in 2018. I hope
18 that answers your question, Mr. President.

19 PRESIDENT: Well, it begins to answer the
04:20:52 20 question.

21 As we understand, the Claimant's case is
22 that the government failed to take measures necessary to
23 protect the Claimant's investments in breach of the full
24 security and protection obligation and other obligations
04:21:05 25 under the CAFTA.

04:21:09 1 So if the complaint is that certain
2 measures were not taken in the Claimant's view that
3 should have been taken, very specifically what are the
4 measures that were in fact taken that fall under article
04:21:24 5 21.2(b), particularly during the period of the
6 occupation?

7 MR. RAMOS-MROSOVSKY: Right. Well, the
8 occupation of course --

9 PRESIDENT: I understand -- sorry, before
04:21:36 10 you go --

11 MR. RAMOS-MROSOVSKY: Yes.

12 PRESIDENT: You use terms like "approach"
13 or a "strategy" or a "method." But if you want to -- if
14 these terms are replaced by the measure which is a term
04:21:51 15 used in 21.2(b), what are the measures that we are
16 talking about that are protected by this provision or
17 fall under this provision?

18 MR. RAMOS-MROSOVSKY: In an absolute
19 sense, I would say all of the measures taken in
04:22:03 20 response, but to identify particular measures, which I
21 think is your question, Mr. President, there is the
22 immediate response in 2018 that Ms. González showed you
23 that had the individuals removed from the land
24 two months after the occupation.

04:22:20 25 There is the process of dialogue, the

04:22:23 1 repeated meetings, the special commission, the
2 interagency body being established to persuade these
3 individuals to leave the Hacienda peacefully, to find
4 other land for them, to encourage them to do so, to
04:22:37 5 encourage them to move their families there.

6 There was the decision -- ultimately, of
7 course, there was the use -- police power was in the
8 background here, but the preference the State always
9 followed was for a dialogue, a peaceful solution that
04:22:55 10 may have taken more time than -- you might think it
11 would take more time than pushing them off, as had been
12 done in the past, but in fact it was a three-year
13 process. They'd had a four-year process in the early
14 2000s.

04:23:08 15 The measures included finding other land,
16 meetings between the members of the cooperative and the
17 residents of the -- excuse me -- and the interagency
18 body. All of that. Ultimately there was a threat of
19 legal sanction if they didn't resettle. These measures
04:23:27 20 included allowing individuals to stay on the land until
21 they finished their harvest before meeting. All of
22 these steps that balance the State's interests in not
23 inflaming the historical sore spot reflected by the
24 peace settlement with protecting and upholding the
04:23:48 25 undisputed property rights of the investor.

04:23:51 1 I think in terms of the dispute before
2 you, the measures that are challenged involve the choice
3 to not send in the military. Some of these measures are
4 a decision to use a softer touch. To not send in SWAT
04:24:15 5 teams and soldiers immediately as the Claimant in its
6 Reply seems to suggest that would have been needed.

7 That choice to use a dialogue, a
8 discussion-based, cooperative, collaborative approach
9 rather than immediate force is a measure we understand
04:24:30 10 the claimants to be challenging.

11 PRESIDENT: Thank you.

12 MR. RAMOS-MROSOVSKY: Thank you. I was
13 talking about 21.2, Professor Burke-White's report and
14 alluding to some of his credentials.

04:24:48 15 The point here is Professor Burke-White is
16 a distinguished scholar of international law, a former
17 advisor to Secretary of State Hillary Clinton and he has
18 written perhaps the leading article on non-precluded
19 measures clauses in US investment treaties.

04:25:03 20 You won't get to meet him at this hearing
21 because Claimant retracted its request to cross-examine
22 him, but we think his report is particularly important
23 because it goes to the history of article 21.2(b) and
24 more broadly of the self-judging essential security
04:25:20 25 clause in US investment treaties, what it's meant to

04:25:25 1 achieve and its purposes.

2 Curiously, interestingly enough, the
3 essential security clause that you see in article
4 21.2(b), or alluding to the correspondence over the
04:25:35 5 weekend that was at stake in the Colombia-US TPA that is
6 the case governing the *Seda* award that we're all waiting
7 to see, reflects what US treaty negotiators have
8 historically called "the Nicaragua problem." And it's
9 sort of ironic that here we are representing Nicaragua,
04:25:55 10 but of course this is a more broadly used treaty
11 provision.

12 The history here is interesting. Decades
13 before DR-CAFTA, the US and Nicaragua had entered into a
14 1956 Friendship Commerce and Navigation treaty. It
04:26:09 15 should be on the next slide. That treaty provided that
16 it would not preclude measures necessary to protect
17 either party's essential security interests. But it
18 lacked the "which it considers necessary" language that
19 we see in DR-CAFTA.

04:26:27 20 This was a very important difference when
21 Nicaragua successfully sued the United States before the
22 ICJ for, among other things, breaching this treaty
23 through its support for the Nicaraguan resistance, for
24 the same contras we've been discussing all day during
04:26:42 25 Nicaragua's civil war, the later stages of the Cold War.

04:26:45 1 The absence of any self-judging clause in
2 the ICJ's view meant that the US position that its
3 intervention in Nicaragua, its armed intervention in
4 Nicaragua, had been a matter of its essential security
04:26:59 5 was subject to review by the ICJ.

6 Following its loss in that case, the
7 United States began including explicitly self-judging
8 essential security clauses. To be sure, the US had
9 taken the position that essential security clauses were
04:27:15 10 self-judging but they didn't say so explicitly. In
11 response to the ICJ's decision in the *Military and*
12 *Paramilitaries Activities v. Nicaragua* decision the US
13 government made an absolute explicit policy choice to
14 spell that out.

04:27:29 15 As Professor Burke-White details in his
16 report, he goes through the various Senate reports and
17 diplomatic history of statements to Congress and so on
18 and quotes various treaty negotiators. The US made the
19 decision, a deliberate decision, that its national
04:27:47 20 interest in having a self-judging essential security
21 clause was worth -- was worth weakening the BIT and
22 inevitably reducing the treaty protections that might
23 otherwise be available to US investors in certain quite
24 challenging circumstances. You see some of that
04:28:07 25 language on the slide here. Kenneth Vandervelde, of

04:28:08 1 course an eminent academic, was also one of the
2 negotiators of these treaties.

3 The first US treaty to include this
4 revised essential security provision that contained the
04:28:19 5 explicit self-judging language was the US-Bahrain BIT.
6 Madeline Albright, who was the Secretary of State at the
7 time, explained that the purpose of this new clause was
8 "to make explicit the implicit understanding -- at least
9 the implicit understanding of the United States -- that
04:28:36 10 measures to protect the parties' essential security
11 interests are self-judging in nature." Although she
12 noted that each party would expect the provisions to be
13 applied by the other in good faith.

14 You can see on the slide that the relevant
04:28:51 15 article from the US-Bahrain BIT is materially identical
16 to article 21.2(b) of the DR-CAFTA.

17 If we move on to the next slide, we see
18 some of the treaty ratification documents related to
19 DR-CAFTA itself. These tell the same story. We see
04:29:07 20 President George W. Bush's report to Congress on the
21 treaty and in his letter to Congress, President Bush
22 explicitly stated that "article 21's exceptions for
23 essential security allow each party to take actions it
24 considers necessary to protect its essential security
04:29:25 25 interests."

04:29:26 1 On the next slide we see a report from the
2 office of the United States Trade Representative, which
3 separately specifically made this same point to Congress
4 that article 21 included specific exceptions for
04:29:38 5 national security and that "nothing in the CAFTA-DR," as
6 they called it there, "shall be construed to compel a
7 party to ... prevent it from applying measures that it
8 considers necessary to its essential security
9 interests."

04:29:52 10 That the US considered this clause
11 essential doesn't, of course, change the fact that it's
12 reciprocal. Of course the *Seda* case, which we're all
13 eager to see what the award finally says, represents an
14 instance where it appears -- this clause appears to have
04:30:09 15 been invoked successfully by Colombia to completely rule
16 out an investor's claim.

17 It formed an essential part -- this
18 essential security clause, self-judging essential
19 security clause, formed an essential part of the bargain
04:30:24 20 agreed to by the United States, Nicaragua and the other
21 DR-CAFTA parties, defining the extent to which they
22 consented to limit their freedom of action and the scope
23 of their obligations to protected investors.

24 So Claimant's suggestion that the
04:30:39 25 self-judging exception somehow swallows the entirety of

04:30:42 1 the treaty misses the point. It's a critical part of
2 the DR-CAFTA architecture and one without which the
3 treaty would never have been ratified by the US Senate.
4 And of course, while there are many common
04:30:59 5 clauses and of course there's jurisprudence from one
6 investment treaty to another, not all investment
7 treaties are identical and they don't have to be.
8 I note also that the United States has
9 participated, at least in writing, as a non-disputing
04:31:15 10 party in this case. It was brought by a US investor and
11 the United States has not taken issue with a single word
12 of Nicaragua's interpretation of article 21.2(b),
13 despite having had every opportunity to do so, and
14 that's because Nicaragua's interpretation of article
04:31:31 15 21.2(b) is the United States' interpretation of article
16 21.2(b).
17 PRESIDENT: There may be a follow-up
18 question on that. The reference to "essential security
19 interests" I understand in your submission covers both
04:31:59 20 emergencies in international relations of a Member State
21 of the CAFTA, as well as internal --
22 MR. RAMOS-MROSOVSKY: Yes.
23 PRESIDENT: -- security issues like civil
24 strife.
04:32:14 25 MR. RAMOS-MROSOVSKY: Yes, that's correct,

04:32:15 1 Mr. President.

2 PRESIDENT: What is your case on why it
3 covers both rather than only one of them?

4 MR. RAMOS-MROSOVSKY: Maybe we can just go
04:32:27 5 back to the article, to the language of the clause.

6 PRESIDENT: Article 21.2(b) refers to
7 obligations regarding the maintenance and restoration of
8 international peace and security, which would cover
9 measures taken by the Security Council, for instance,
04:32:51 10 under chapter 7. And, similarly, one could read this to
11 cover measures taken by a State to protect its own
12 national security interests against an external threat.

13 But you are saying -- your case is that it
14 also covers internal security issues?

04:33:12 15 MR. RAMOS-MROSOVSKY: Yes.

16 PRESIDENT: And simply the question is
17 what is the basis for your case that it covers both
18 types of security issues?

19 MR. RAMOS-MROSOVSKY: Sure. Let me speak
04:33:23 20 to that.

21 I think it's important, as a textual
22 matter, that article 21.2(b) has two clauses. One has
23 the word international peace or security in it so that
24 obviously implies relations between more than one state.

04:33:38 25 And the other is broader. It says "the

04:33:39 1 protection of its own essential security interests."
2 I'd say as a textual matter that not every State has the
3 same essential security interests.

4 Nicaragua doesn't -- I'm obviously counsel
04:33:54 5 for Nicaragua in this case, so I'm trying to answer your
6 question -- Nicaragua isn't afraid of an invasion from a
7 neighboring State.

8 PRESIDENT: I was not asking for
9 Nicaragua's position or its concerns. It's not a
04:34:12 10 question of fact. It was a question of interpretation
11 of this provision.

12 MR. RAMOS-MROSOVSKY: I understand,
13 Mr. President. I hope I can answer your question.

14 I guess what I'm getting to is that a very
04:34:24 15 credible reading of the second clause, "protection of
16 its own essential security interests," which are of
17 course to be defined by the State, to be considered
18 necessary by the State, leaves States freedom to
19 determine their essential security interests
04:34:40 20 differently. Some States are afraid of external
21 threats, some States have to be concerned about internal
22 problems. And the case law I think supports this. I
23 was going to get to them but there are the Argentinean
24 cases, *LG&E Energy*, *Continental Casualty* which are in
04:34:59 25 our papers. To be clear, these were not self-judging

04:35:03

1 clauses.

2

3 But in those cases it was recognized that
4 a severe economic crisis could implicate a State's
5 essential security because it's destabilizing. And just

04:35:14

6 going by the press reports on *Seda v. Colombia*, as far
7 as we can tell, and of course I would concede that we
8 need to see the final award, the essential security

8

9 interests at issue there appear to be Colombia's
10 interest in combating narcotics, the drug war, not a

04:35:33

11 foreign threat or an attack from Brazil or something of
12 that nature.

12

13 So I think both textually, and given that
14 countries are differently situated, that language is
15 capacious by design. I would say that tribunals have
16 recognized that States can face different kinds of
17 challenges to their essential security.

04:35:47

18

17

PRESIDENT: Thank you.

18

MR. RAMOS-MROSOVSKY: Thank you,

19

Mr. President.

04:36:00

20 Now, I would like to be clear. Earlier

21

22 today we heard Claimant's counsel suggesting that

22

23 Nicaragua hadn't properly invoked this clause, that it

23

24 hadn't documented its contemporaneous -- I don't have

24

25 the transcript in front of me -- but it hadn't

04:36:16

documented its contemporaneous decision to decide that

04:36:20 1 the invasion of Hacienda Santa Fé implicated its
2 essential security interests and that we should be
3 seeing memos from the Ministry of Defense and heaven
4 knows where else.

04:36:32 5 What I would put to the Tribunal and how I
6 would respond to that is to say that is the argument
7 that Nicaragua won against the United States. That is
8 the kind of argument that the self-judging language
9 precludes. A State's good faith is presumed, and the
04:36:46 10 burden would be on Claimant to show otherwise.

11 That being said, I think on the facts
12 here, as Ms. González laid them out for us, given that
13 you did have individuals who are undisputedly former
14 fighters, who are undisputedly in their hundreds,
04:37:04 15 heavily armed and who explicitly rooted their claim to
16 this land in a peace settlement of a war that they had
17 fought against the Nicaraguan government when it was
18 headed by the same president, the same political party,
19 I think by any good faith analysis, you look at what a
04:37:22 20 reasonable person in the State's position would have
21 concluded. Professor Burke-White gets into this at
22 greater length in his report. It's one of the reasons
23 it's a pity he's not here to speak with you.

24 But by any measure we have absolutely met
04:37:37 25 that burden, but it isn't actually our burden, it's the

04:37:40 1 Claimant's burden because that's what was changed by
2 this new kind of essential security clause.

3 I'm just looking at my notes here. I
4 jumped ahead in answering your question. We were
04:37:54 5 talking about the Argentine cases. Clearly Nicaragua
6 faced circumstances within this range of external
7 invasion. Even the ICJ, in the *Paramilitary Activities*
8 case, noted that the concept of essential security
9 interests extends beyond an armed attack and has been
04:38:11 10 subject to very broad interpretations. That's in our
11 papers, or it should be -- here, it's on the slide, you
12 get the citation. Again, as I was saying, the roots of
13 the local conflict over Hacienda Santa Fé are in a much
14 older and deeper national trauma, the civil war.

04:38:29 15 Nicaragua in its circumstances had a good
16 faith basis to perceive that the country's essential
17 security interests were implicated by those events.

18 That should be the end of matters.
19 Claimant naturally seeks to escape article 21.2(b)'s
04:38:45 20 preemptive effect in a number of ways. If we can go to
21 that slide.

22 I think here we've heard arguments about
23 the Russia-Nicaragua BIT. What I would point you to
24 again is the text of article 21.2(b) which starts with
04:39:01 25 key phrase "Nothing in this agreement shall be

04:39:05 1 construed," the agreement being DR-CAFTA, that nothing
2 covers the most-favored nation clause. Nothing means
3 nothing. The most-favored nation clause can't override
4 article 21.2(b), and it would be a very strange reading
04:39:21 5 where we know that the essential security clause was an
6 absolute predicate for DR-CAFTA happening at all. The
7 US Senate has set out -- and it's in Professor
8 Burke-White's report and it's in our papers. The US
9 Senate simply would not have approved this treaty and it
04:39:36 10 is a staple provision of all US investment agreements
11 since.

12 But beyond the fact that we have the word
13 "nothing," we can even go to the investment chapter,
14 where of course the MFN clause that claimants try to
04:39:51 15 pull in the Russian BIT with is found.

16 Article 10.2: "In the event of any
17 inconsistency between this chapter," that is the
18 investment chapter, "and another chapter, the other
19 chapter shall prevail."

04:40:05 20 So if there's an inconsistency between the
21 exceptions chapter, where we find article 21.2, and the
22 investment chapter, article 21.2 prevails over anything
23 in the investment chapter and defeats any potential
24 application of the MFN clause.

04:40:25 25 There's a further problem with this MFN

04:40:28 1 argument. This applies prefacing a little bit my
2 argument on article 10.6 as well and I hope we can save
3 some time, is that to use an MFN clause, to import a
4 more favorable provision, there must be a more favorable
04:40:46 5 provision.

6 Can we go to the CMS slide? This was an
7 issue for the Tribunal in *CMS v. Argentina* where a
8 similar argument was used. The Tribunal said, "Although
9 the MFN clause has been invoked because other treaties
04:41:00 10 done by Argentina do not contain a provision similar to
11 the -- what was the state of emergency clause in the
12 UK-Argentina BIT -- the Tribunal is not convinced that
13 the clause has any role to play. The mere absence of
14 such a provision does not lend support to applying the
04:41:19 15 MFN clause."

16 There's a good reason for this. Because
17 otherwise the MFN clause would simply homogenize all
18 investment agreements and would defeat the intent of the
19 parties. You would create a kind of jurisprudential
04:41:37 20 black hole which you can see on the slide from which the
21 predicate intent to the treaty of the United States and
22 the other DR treaty parties would never escape. The
23 United States and the other DR-CAFTA parties did not
24 intend to enter into the Russia-Nicaragua BIT.

04:41:54 25 And that's why there are defenses in --

04:41:57 1 there are logical defenses in the structure of the
2 treaty both from the word "nothing" in article 21.2,
3 article 10.2 making very clear that nothing in chapter
4 10 can prevail over one of the exceptions. Otherwise,
04:42:11 5 you have the situation where any bespoke provision will
6 just get vaporized. And that's not -- that's not a
7 plausible reading of what should happen under these
8 agreements.

9 We heard a bit also about the annexes, the
04:42:29 10 law enforcement annex. There was a discussion about the
11 sector being social services. We certainly don't
12 coincide with Claimant's reading of this.

13 The measures here are law enforcement
14 measures. It's irrelevant for purposes of applying this
04:42:45 15 exception. Mind you, this is a tertiary argument. We
16 have nothing -- we have the lack of comparator for the
17 MFN to begin with. This is assuming you get to MFN.

18 The provision of law enforcement is a
19 social service. The removing of squatters from occupied
04:43:03 20 land is a social service. Whether that is an avocado
21 farm or a cement factory or a school is immaterial.

22 The concern here, as we read this
23 provision, is with the State not having to worry about
24 the MFN clause disrupting its ability to provide law
04:43:24 25 enforcement and correctional services.

04:43:28 1 It was also a discussion of necessity.
2 Claimant's counsel suggested that article 21.2(b) was
3 somehow just a necessity defense. That fails on the
4 basis that we would say of an effective reading of the
04:43:40 5 provision. There's no reason for such provision and we
6 should assume that it's not a waste of text.

7 A necessity defense is absolutely not
8 self-judging by any means and it's an extremely
9 difficult standard to meet. So that, we submit, is not
04:43:54 10 a plausible reading.

11 Similarly this idea, whether it's anchored
12 in the Eco Oro award that is in their papers, or article
13 27.2 which says that measures precluding wrongfulness
14 are without prejudice to liability. Again, you can't
04:44:09 15 have an effective reading of an exception that is
16 designed to -- explicitly designed and announced by the
17 largest treaty party obviously to protect its strategic
18 freedom of action and yet have an obligation to pay
19 damages.

04:44:24 20 If article 21.2(b) is in the treaty, it
21 must be read to have meaning. If it precludes
22 wrongfulness, it should preclude compensation for that
23 non-wrongfulness. There's no responsibility to pay
24 damages when there has not been a wrongful act. A
04:44:40 25 better case we suggest on that issue would be *LG&E v.*

04:44:44 1 *Argentina* again, which recognized that a non-precluded
2 measures clause would exempt the State from liability if
3 it applied.

4 I'll turn next, if I may, to article 10.6
04:45:01 5 of the DR-CAFTA. This is a provision in the investment
6 chapter and it provides treatment in case of strife,
7 that "each party shall accord to investors of another
8 party, and to covered investments, non-discriminatory
9 treatment with respect to measures it adopts or
04:45:16 10 maintains relating to losses suffered by investments in
11 its territory owing to armed conflict or civil strife."

12 This provision is *lex specialis*. It
13 supersedes the more general standards of protection
14 contained in chapter 10 and the specific situation of
04:45:31 15 armed conflict.

16 It means, we submit, that Nicaragua can
17 only be liable if Riverside can show that Nicaragua
18 discriminated among investments relating to losses due
19 to an armed conflict or civil strife. The State's
04:45:46 20 obligation is limited to not discriminating among
21 investors when a civil strife or armed conflict occurs.

22 The clause we say is plainly applicable,
23 and we can take a look at an independent news broadcast
24 from July 30, 2018 from Nicaragua. It's very short.

04:46:05 25 I'm sorry, Mr. President, did you have a question first?

04:46:08 1 PRESIDENT: No.

2 MR. RAMOS-MROSOVSKY: Why don't we play
3 the video.

4 "Nicaragua is experiencing a deep social
04:46:47 5 and political crisis. Since April 18th there have been
6 hundreds of deaths and thousands of people have been
7 injured and the demonstrations against President Ortega
8 have not stopped. The country seems to be on a road to
9 a showdown after more than 100 days of continuous
04:47:00 10 protest. What is the future for Nicaragua?"

11 That is a mercifully short video clip, but
12 that is contemporaneous reporting by Euronews, an
13 independent outlet from Nicaragua at the time, and it's
14 one of the Claimant's exhibits.

04:47:14 15 So that's what was going on in Nicaragua
16 at the time and that was what was going on when Hacienda
17 Santa Fé was occupied by former combatants, former
18 Contra combatants, who made very clear they were
19 prepared to use violence to defend their claim and who
04:47:32 20 claimants alleged in fact used violence entering onto
21 the property.

22 Nicaragua's response to that invasion and
23 losses caused by that invasion more particularly falls
24 therefore within the coverage of article 10.6.

04:47:43 25 Because the article applies, the relevant

04:47:45 1 question becomes whether any investor received
2 compensation that claimant didn't?

3 The answer is no. No other investor was
4 affected by the occupation of Hacienda Santa Fé and
04:47:55 5 there is no evidence anywhere in the record that any
6 other investors received compensation for losses from
7 the civil strife and random invasions that more broadly
8 convulsed Nicaragua in 2018.

9 Now, as with the self-judging essential
04:48:10 10 security clause, Claimant has deployed a plethora of
11 arguments to escape the consequences of article 10.6.
12 It does so again by -- I think once is enough, guys --
13 with reference to the Russia-Nicaragua BIT and the MFN
14 clause.

04:48:30 15 Now, I would submit this argument doesn't
16 work because of the reservation we discussed. But even
17 jumping ahead, let's assume that it could operate, to
18 borrow -- the MFN could operate, to borrow the
19 Russia-Nicaragua BIT. We say there is really no
04:48:46 20 difference.

21 Can we get to the Russia BIT slide,
22 please. The Russia-BIT at article 5 provides a similar
23 equal treatment obligation with respect to damages and
24 loss "owing to war, armed conflict, insurrection,
04:49:09 25 revolution, riots, civil disturbance, a state of

04:49:14 1 national emergency or any other similar event."

2 So the difference between these
3 provisions, even if this MFN mechanism did apply, is
4 immaterial. Nicaragua has no liability under the
04:49:28 5 DR-CAFTA or if the Russia provision applied under that
6 provision either.

7 Now, that should dispose of all of
8 Claimant's post Reply case. But if you were to somehow
9 reach its revised case on the merits, you should still
04:49:48 10 find no liability here.

11 That brings me to the third set of
12 defenses that I mentioned earlier.

13 Riverside invokes various DR-CAFTA
14 provisions under which it claims that Nicaragua faces
04:50:00 15 liability. I will address in order -- let's have the
16 roadmap slide -- claims about the protective order that
17 Nicaragua's Attorney General obtained over the Hacienda
18 from a local court, which have been advanced as alleged
19 breaches of article 10.4's expropriation provision or
04:50:14 20 article 10.5's guarantee of fair and equitable
21 treatment, claims that Nicaragua's response to the
22 illegal private invasion and occupation of Hacienda
23 Santa Fé was insufficient or discriminatory, whether
24 under article 10.5 or antidiscrimination provisions of
04:50:30 25 the MFN and national treatment standards.

04:50:33 1 Let's turn first to the protective order.
2 I'm going to try and save a little bit of time because
3 Ms. González spoke to it as well, but I obviously want
4 to be sure to cover it sufficiently for you.

04:50:44 5 The protective order, members of the
6 Tribunal, is exactly that. It is protective. There has
7 been no transfer of title, de jure or de facto as to the
8 Hacienda. None whatsoever. It is a response to
9 Riverside's abandonment of its own recovered investment.

04:50:59 10 And you see on the next slide each of the
11 so far five instances which Ms. González covered for us
12 earlier. And to remind you of this, this is why there
13 is a protective order because Riverside has refused to
14 resume possession of its undisputed investment. So
04:51:17 15 something had to be done to safeguard the property,
16 especially with this arbitration pending. And what was
17 done was to set up this protected depository
18 relationship.

04:51:27 19 It is explicitly premised -- next slide --
20 on INAGROSA being the 100 percent actual owner of
21 Hacienda Santa Fé, and here you see documents from the
22 Nicaraguan property registry. This is the legal
23 position of Nicaragua. It is the recorded position of
24 the ownership of Hacienda Santa Fé under Nicaraguan law
04:51:44 25 today.

04:51:44 1 And of course you will hear from
2 Nicaraguan law experts who can take you into the weeds
3 more deeply. But I would emphasize that the Tribunal
4 has already found that the protective order does not
04:51:56 5 prevent INAGROSA resuming possession of the Hacienda at
6 any time. And it doesn't.

7 Nothing could make that clearer than the
8 exchange of correspondence we saw this past January when
9 Ms. González, on behalf of Nicaragua, asked Riverside
04:52:10 10 whether it was necessary to renew the protective order.
11 Should we have a protective order?

12 This was an opportunity for Claimant to
13 say no, we don't want it anymore. We'd like our
14 property back. They of course didn't say that. They
04:52:25 15 responded with a 30-page document which derided the
16 inquiry as irrelevant. But what they didn't do in all
17 those 30 pages, although they easily could have, was
18 ask -- inquiries about how to resume possession of the
19 Hacienda, ask pointed questions.

04:52:42 20 They do not want it. And the reason they
21 don't want it, Mr. President, members of the Tribunal,
22 is that to accept the reality that Nicaragua is
23 preserving, is protecting this property for its rightful
24 undisputed owners would admit the fiction of Riverside's
04:53:00 25 aspirational expropriation. That's the heart of the

04:53:03 1 issue here of their expropriation claim.

2 If they can't show a State-commissioned
3 invasion, they've tried to reconstitute their
4 expropriation claim on the basis of this protective
04:53:15 5 order which is there to keep it for them. But the
6 problem is that ultimately Riverside's grim
7 determination to will an expropriation into existence
8 isn't enough.

9 As to why Riverside might be pursuing this
04:53:29 10 course, Mr. Molina will explain to you what the
11 prospects for its avocado business were, so I'll move
12 on. So much for expropriation.

13 As far as FET goes, the protective order
14 effectuates and really likely far exceeds Nicaragua's
04:53:46 15 FET and full protection and security obligations, the
16 Tribunal has found doesn't transfer ownership, it's
17 under constant guard at public expense for the
18 Claimant's benefit.

19 And just consider the strangeness, members
04:53:58 20 of the Tribunal, of an investor purporting to find a
21 breach on Nicaragua's part where the State has taken
22 upon itself a specific and unique responsibility to
23 protect the investor's property at its own expense, all
24 in a context where that property has been subjected to
04:54:15 25 repeated armed invasions by disgruntled Nicaraguan

04:54:18 1 citizens who, at least historically, opposed the State
2 in a conflict.

3 The Tribunal couldn't have put it better
4 than it did in Procedural Order No. 4 where you
04:54:27 5 recognized that the order was for the purpose of
6 protecting and not for the purpose of seizing Hacienda
7 Santa Fé, and that the order itself specifically
8 acknowledged that the property was registered in favor
9 of INAGROSA and, thus, did not purport to transfer
04:54:42 10 ownership.

11 So there is of course a shift away from
12 the reality and the logic of this to arguments about due
13 process. Riverside alleges that Nicaragua somehow
14 breached the FET standard by not noticing the protective
04:55:03 15 order quickly or promptly enough. That's not correct,
16 we say, because under Nicaraguan law, Nicaragua was
17 allowed to seek provisional relief ex parte and you can
18 see on the slide that Riverside had constructive notice
19 as early as January of 2022.

04:55:19 20 But way more fundamentally than these nice
21 points about notice is the question about prejudice.
22 There is no prejudice where Riverside has had every
23 opportunity to seek to annul or vacate the protective
24 order if they wish to do so formally through Nicaraguan
04:55:34 25 proceedings. They've had an opportunity to tell us

04:55:36 1 please don't renew it. We asked them. They refused to
2 take the property back. And, of course, as Ms. González
3 said, it's their property. We represent that to you in
4 this Tribunal in this proceeding.

04:55:50 5 Each invitation of course is further
6 notice of the measures that have been taken for
7 Riverside's own benefit. This is simply not the stuff
8 of which FET breaches are made. And the judicial
9 expropriation theory is of a piece with the sort of
04:56:05 10 broader retooling of Riverside's claims after the
11 Counter-Memorial.

12 You were asked to believe there were
13 hundreds of armed paramilitary troops. Now you're asked
14 to believe that there is a secret judicial
04:56:19 15 expropriation. The common thread here is that Riverside
16 would like to have a claim before you far more than they
17 would like to grow any avocados.

18 Let me turn next to the allegations mostly
19 alleged under the FET and FPS standards, but also under
04:56:33 20 the national treatment and most favored nation standards
21 that the Nicaraguan state's response somehow fell short,
22 was somehow defective of the requirements of the FET and
23 FPS.

24 To be sure, our position is the Tribunal
04:56:50 25 shouldn't reach any of this for the reasons I've walked

04:56:53 1 you through, I hope clearly enough, under articles 21.2
2 and 10.6; and Ms. González has covered much of the back
3 and forth of the measures. And you'll be hearing from
4 Diana Gutiérrez and other witnesses who were directly
04:57:06 5 involved in the process of removing these individuals,
6 officials, police officials and so on. So I'll limit
7 myself to a few more general observations.

8 Whether we consider Nicaragua's
9 non-violent solution, successful non-violent solution to
04:57:22 10 the occupation of the Hacienda Santa Fé through the lens
11 of full protection and security or anti-discrimination
12 or fair and equitable treatment, the common thread with
13 all of these standards is that they require a reasonable
14 conduct from the State under the circumstances. We have
04:57:36 15 some on-point citations on this slide to *Duke Energy* and
16 *Spanish Morocco*.

17 I'm going too fast. If I may, I'm going
18 to jump a little bit because I want to be sure we finish
19 on time and I'm sure you've had access to these
04:58:03 20 citations in our papers.

21 We should be mindful as well that
22 investment tribunals have been reluctant to second-guess
23 a sovereign State's discretionary policy decisions about
24 matters like the deployment of its law enforcement and
04:58:15 25 military personnel. This is setting aside article 21,

04:58:18 1 setting aside article 10.6. Under any investment treaty
2 regime, these are the sorts of decisions, as the
3 tribunal in the *Dreyfus v. India* case, which I read with
4 great interest in preparing our Rejoinder, explained our
04:58:31 5 judgment calls. Tribunals should be wary of
6 second-guessing these sovereign judgment calls.

7 In the *ELSI* case, likewise the ICJ
8 explained that the obligation to provide constant
9 protection and security does not entail an absolute
04:58:47 10 guarantee that an investment will never be disturbed.

11 That's much like what the Tribunal in
12 *Pantechniki v. Albania* recognized, that the protection
13 owed is that which is reasonable in the circumstances
14 and with the resources of the state in question.

04:59:05 15 *Tekfen*, another case the Tribunal refused
16 to find a breach of full protection and security based
17 on Libya's sovereign choices about the deployment of its
18 armed forces at a time of a major internal armed
19 conflict.

04:59:16 20 Because, put another way, these are the
21 sorts of decisions as to which a sovereign State
22 necessarily enjoys a very wide margin of appreciation.
23 That must be particularly so at a time of nationwide
24 crisis, or as the *Continental Casualty* tribunal
04:59:32 25 recognized, "a time of grave crisis is not the time for

04:59:36 1 nice judgments particularly -- I liked this phrase --
2 when examined with the disadvantage of hindsight."

3 Against those principles and the facts set
4 out in Nicaragua's papers and so eloquently by my
04:59:47 5 colleague earlier today, Riverside's critique of
6 Nicaragua's response to the illegal armed occupation of
7 the Hacienda Santa Fé must fail. It should fail because
8 it was reasonable for Nicaragua to have more policemen
9 in its capital city, Managua, or Leon, its second
05:00:02 10 largest city. We saw on Claimant's slides some
11 highlighted instances of land invasions of property
12 seizures by squatters. Those occurred in the second
13 largest city in Nicaragua, not in Jinotega, San Rafael
14 del Norte where eight policemen were pitted against 500
05:00:21 15 plus armed invaders. That's common sense, not
16 discrimination.

17 And we submit Nicaragua's response was in
18 no way unreasonable, despite the fact that the State was
19 dealing with undisputed widespread disorder. Police
05:00:35 20 were limited by presidential orders to stay in their
21 barracks because of other very pressing needs to calm
22 the situation, and they were outnumbered by maybe 30 to
23 1. Nicaraguan authorities responded to the invasion of
24 the Hacienda Santa Fé. They -- in fact, as we have
05:00:52 25 seen, they got all these individuals off the land within

05:00:56 1 two months. But at the moment when the police were
2 outnumbered facing these hundreds of armed individuals
3 whom, as the claimants have told us many times, brought
4 rocket mortars onto the property, they prevented a
05:01:10 5 violent escalation.

6 My colleague spoke about the disarming of
7 the security guards at Hacienda Santa Fé to prevent a
8 blood bath. Quite right, members of the Tribunal.
9 Three individuals would have gotten themselves killed
05:01:21 10 and the police would have gotten killed, most likely.
11 There was very little that could be done immediately
12 except to make the situation worse.

13 Nicaragua's authorities prevented a
14 violent escalation and once the situation gradually
05:01:35 15 calmed, twice removed all the individuals from the
16 property. Once right away after two months and then
17 after the investors failed to resume possession of their
18 property and everyone came back in, they eventually
19 relocated everyone. They're off the property now and
05:01:52 20 it's secured. This was certainly not an easy task to
21 relocate more than 150 families, many armed, with their
22 children and so on.

23 But we heard a great deal about like
24 circumstances, and I would emphasize to the Tribunal,
05:02:05 25 and keep this in mind please as you hear the evidence,

05:02:09 1 it's not just that we're talking about Jinotega versus
2 Managua or Leon. Certainly police resources and urban
3 versus rural environment are relevant distinctions in
4 the circumstances of these land occupations. But we
05:02:24 5 know absolutely nothing in the record about who the
6 invaders were in these other places.

7 We know that Hacienda Santa Fé -- because
8 they tell us and it's in the documents before you -- we
9 know that many of these invaders were heavily armed,
05:02:40 10 former members of the Contras, who thought they'd been
11 promised the farm as part of the peace settlement at the
12 end of a civil war.

13 We know nothing about whether Nicaragua
14 was facing equivalent identity of the invaders in these
05:02:57 15 other contexts and the inference must be that they
16 weren't. So it's a very unusual and dangerous
17 situation.

18 Really, that should be enough, members of
19 the Tribunal. I'd like to stop there but for one final
05:03:09 20 point that I've saved up for the end because I think
21 it's a very important one. And it's this, that the
22 State's legitimate discretion -- I think I actually got
23 into some of this in response to your question earlier,
24 Mr. President -- but the State's discretion extends not
05:03:23 25 simply to where and how to deploy its police and how

05:03:26 1 many police to put in this town versus that town, but
2 that it also extends to the decision about how to use
3 those police. Do we send the police in to push
4 everybody off the land and go through the kind of
05:03:38 5 episode -- this brutal episode -- that happened in 2004,
6 or does the State have the discretion to prioritize a
7 peaceful and non-violent solution to a dangerous
8 situation, as it did here?

9 And I'm reminded there is Law 872, the
05:03:53 10 Nicaraguan police law that Claimant put in front of you,
11 it's striking that it places the interest in human life
12 and integrity before property. And at some level we
13 would say that avocados are less valuable than human
14 lives and certainly an unsuccessful avocado business is
05:04:09 15 less valuable than human life.

16 The cases as well as common sense support
17 this discretion. In *South American Silver*, which should
18 be on the slide and is in our Rejoinder, the Tribunal
19 rejected the investor's claims that Bolivia somehow
05:04:26 20 breached its international obligations by declining to
21 militarize the areas surrounding an investment that was
22 subject to blockades and violence by local opponents.

23 The *South American Silver* tribunal -- and
24 I would urge you to look at their award -- noted the
05:04:43 25 experience of the State in this regard had counseled

05:04:46 1 against that approach, even though it was demanded by
2 the investor and warned -- and noted -- the State had
3 taken the view but the measures demanded by the investor
4 could have had fatal consequences.

05:05:00 5 So too here where the record shows that
6 Nicaragua's gradual and measured approach, informed by
7 the experience of the State, the traumatic experience of
8 the State as a historical matter and the long experience
9 of the State in this particular dispute worked. It
05:05:15 10 avoided fatal consequences and the Hacienda is
11 successfully secured. I'm sure that process took time,
12 although significantly less than in the early 2000s with
13 better results. But of course the Claimant is plainly
14 in no hurry to get back onto the property.

05:05:32 15 Even so, that seems to be the crux of its
16 objection or of its FPS argument. More force, more
17 violence, more police would have solved Riverside's
18 problem faster, they seem to argue. Again, here I'm
19 just puzzled by the argument about the disarmament of
05:05:49 20 the guards. It's a strange wish to -- not wish -- but
21 recklessness I would say about the explosive potential
22 of the situation.

23 So on paragraph 1384 of the Reply we see
24 Claimant play armchair general, arguing in essence that
05:06:11 25 Nicaragua breached its DR-CAFTA obligations by not

05:06:15 1 deploying military forces, or not being ready to deploy
2 military forces or SWAT teams against the occupiers of
3 the Hacienda.

4 Riverside speculates to be sure that
05:06:24 5 Nicaragua could have augmented its police with support
6 from the military and these might have been deployed in
7 a manner that could have minimized or avoided bloodshed.
8 In carrying out its effective response, Nicaragua has
9 avoided bloodshed at Hacienda Santa Fé all together,
05:06:41 10 much better than minimizing, hopefully while still
11 sending in the army.

12 Consider if you will, members of the
13 Tribunal, what this argument really proposes, that
14 DR-CAFTA could have required a State to use its armed
05:06:53 15 force, or the threat of its armed force, against
16 hundreds of its own heavily armed citizens, citizens who
17 had warned that they were prepared -- and warned in
18 writing to the State -- they were prepared to fight to
19 defend the farms they were squatting on with their
05:07:07 20 families and citizens who had fought against the State
21 before. All so that Riverside could more quickly resume
22 possession of a hacienda it does not want, let alone the
23 fact that this could very well have been unsuccessful.

24 We've seen the road. We know how limited
05:07:22 25 police resources were at the time. We submit that no

05:07:25 1 reasonable reading of a DR-CAFTA imposes this kind of
2 duty where alternatives are available as they were. And
3 this isn't just a matter of legitimacy of investor-state
4 dispute settlement or a basic plurality, but also of the
05:07:40 5 provisions of the DR-CAFTA which give the State this
6 kind of discretion.

7 Again, this section of their Rejoinder,
8 1384, speaks volumes. We heard a lot of rhetoric about
9 human rights abuses and politics this morning, but
05:07:56 10 recall that there's a long history of violence related
11 to foreign investment in Latin America. I am not going
12 to get into it here, but I think that's common
13 knowledge. And I think it's fair to submit that by no
14 stretch of the imagination was DR-CAFTA intended to drag
05:08:10 15 any of its treaty parties back to that era or to
16 penalize governments for avoiding violence against their
17 own populations.

18 So it's ironic that, despite Claimant's
19 inflammatory statement and argument this morning, the
05:08:24 20 only human rights related issue actually before the
21 Tribunal is this one, where for all of its rhetoric,
22 Claimant's position seems to be at bottom that in
23 protecting its avocado plantation, the State was not
24 prepared to use enough violence against its own
05:08:41 25 population.

05:08:41 1 That would be appalling enough, members of
2 the Tribunal, if Riverside really wanted to get back
3 into operating a flourishing business. Here the
4 position is almost uniquely shocking given the
05:08:52 5 Claimant's subsequent conduct because after these
6 individuals were removed peacefully, the Claimant has
7 steadily refused to resume possession of the Hacienda.
8 With that, members of the Tribunal, I'd
9 invite any questions you might have, or otherwise I
05:09:03 10 would yield the floor to Mr. Molina, maybe after a short
11 break. But, please, Mr. President.
12 PRESIDENT: Thank you very much. Just one
13 question to make sure I understand your position on the
14 article 10.6, the civil strife provision. Is your case
05:09:26 15 that 10.6 supersedes other provisions of chapter 10,
16 including 10.5?
17 MR. RAMOS-MROSOVSKY: Yes. In the event
18 that the circumstances of civil strife are present, 10.6
19 becomes the obligation in place of the other provisions.
05:09:48 20 PRESIDENT: And why can they not apply in
21 parallel at the same time?
22 MR. RAMOS-MROSOVSKY: I think the history
23 of these provisions is -- we've detailed this in our
24 papers and we're happy to refer you to it,
05:10:02 25 Mr. President -- is that historically States have had

05:10:05 1 reduced obligations in times of civil war. As a
2 customarily international law jurisprudence -- and I
3 confess I don't have the chapter and verse for you but
4 is in our pleadings -- by which when there is a civil
05:10:23 5 war, an insurrection or something of that nature that
6 the obligation becomes equal treatment but not
7 necessarily full compensation. Otherwise there would be
8 relatively little point to having a civil strife clause
9 if it didn't give the government some extra protection,
05:10:37 10 some extra leeway in circumstances of that kind.

11 PRESIDENT: That's fine. We can come back
12 to this later during this hearing.

13 So let's break now for another seven,
14 eight minutes before the final part of the closing
05:10:55 15 until --

16 Before we finish, let's do a time check.
17 How much time is still left for the Respondent?

18 MS. CONOVER: Yes, the Respondent has used
19 two hours and 11 minutes. It has 49 minutes remaining.

05:11:16 20 PRESIDENT: Okay. We'll resume at 20 past
21 five.

22 *(Recess taken)*

23 PRESIDENT: Mr. Molina, the floor is
24 yours.

05:25:35 25 MR. MOLINA: Thank you, Mr. President.

05:25:36 1 Hello, members of the Tribunal. I have the unenviable
2 position of going last in what has been a pretty long
3 day, so I'll try not to be too boring.

4 Today I'm going to be talking to you about
05:25:49 5 Riverside's request for damages and the investments that
6 are at issue here.

7 Now, I'm a little bit surprised. I
8 expected this morning a more robust defense of the
9 damages case that Riverside is requesting, given that
05:26:01 10 they're asking for roughly 1 percent of the country of
11 Nicaragua's GDP. But we heard only a few minutes at the
12 end, and frankly I think we heard more about Russia's
13 investments in Nicaragua than Riverside's investments.

14 But I'm going to try to explain to you why
05:26:16 15 I think that was the case. You see, Riverside is asking
16 for the following amounts that you can see on the
17 screen. First and foremost, Riverside is requesting DCF
18 damages of roughly \$241 million, which it claims to be
19 the fair market value of INAGROSA as of June 16, 2018,
05:26:35 20 which is the valuation date. That is, of course, if you
21 were to credit INAGROSA for an alleged 2,400 percent
22 expansion of the avocado plantation that it had as of
23 that date, an expansion that Riverside admits would not
24 have occurred until many years after the valuation date.

05:26:54 25 Now, if you're unwilling to do that,

05:26:56 1 Riverside is alternatively asking you to award DCF
2 damages of roughly \$168 million, which is predicated on
3 a 500 percent expansion of the avocado plantation.
4 Again, an expansion that Riverside admits was not

05:27:11 5 happening or had not occurred as of the valuation date.

6 In the event this Tribunal rejects the DCF
7 method, as we think it should do, Riverside is asking
8 this Tribunal to pretend that Hacienda Santa Fé has been
9 directly expropriated (it has not), or it was completely
10 destroyed by the invasion (it was not) so that it could
11 award what Riverside claims to be the fair market value
12 of the entire Hacienda as of the valuation date.

05:27:30 13 And last, Riverside is asking for this
14 Tribunal to award moral damages.

05:27:48 15 Today I'm going to walk through each of
16 these amounts and demonstrate why Claimant has not met
17 its burden of proof as to any of them or as to any
18 amounts at all.

05:27:58 19 By the way, one of the puzzling things
20 about the damages case that Riverside is presenting is
21 that Riverside is essentially asking for 100 percent of
22 a business for which it admits it only owned
23 25.5 percent as of the valuation date.

05:28:19 24 Now, this argument might make sense if
25 Riverside were bringing claims on behalf of INAGROSA as

05:28:23 1 it is allowed to do under DR-CAFTA. Indeed, Riverside
2 did bring those types of claims on behalf of INAGROSA,
3 but as you can see on the screen, Riverside voluntarily
4 dismissed those claims more than a year ago.

05:28:34 5 The only claims left are those that
6 Riverside is bringing on its own behalf.

7 I'm going to be spending a lot of time
8 today discussing the DCF model that Riverside has
9 presented along with its reports from its expert,

05:28:53 10 Mr. Vimal Kotecha.

11 Now, the inputs that Mr. Kotecha used in
12 this model come from what we call the avocado-to-riches
13 story. It's a story about a failed coffee business that
14 in a matter of only years it was able to turn itself
05:29:13 15 from being penniless to being worth hundreds of millions
16 of dollars, all without ever having sold one avocado.

17 It's a story that Riverside readily admits
18 is not supported by contemporaneous documentary
19 evidence. It's a story that Riverside claims is
05:29:29 20 supported only by the testimony of Mr. Rondón and his
21 employees, testimony that has changed so significantly
22 from one memorial to another that there have been
23 numerous clarifications and corrections in those witness
24 statements and also in the damages model for

05:29:46 25 Mr. Kotecha.

05:29:47 1 More importantly, it's a story that is so
2 farfetched that INAGROSA'S chief financial officer,
3 Mr. Russ Welty, in a moment of candor, wrote that even
4 he thought the story sounded too good to be true. As
05:29:59 5 the adage goes, if a story sounds too good to be true,
6 it probably is. And this case is no exception.

7 The story goes like this. In or around
8 1998, INAGROSA, a company formed by Mr. Rondón, bought
9 Hacienda Santa Fé in a forced sale for around \$60,000.

05:30:19 10 INAGROSA'S plan was that of many companies
11 in Nicaragua, to grow and sell coffee, which is
12 Nicaragua's largest agricultural export.

13 To finance that operation, it secured
14 investments from Riverside, which Mr. Rondón's in-laws,
05:30:34 15 the Wingers, created for the sole purpose of investing
16 in INAGROSA'S coffee business. That's why Riverside's
17 full name is Riverside Coffee.

18 For the next 15 years, INAGROSA had a
19 run-of-the-mill coffee business. It relied on millions
05:30:50 20 of dollars in loans from Riverside and a million dollar
21 loan from a development bank, LAAD, just to stay afloat.

22 Then, in or around 2013, disaster struck.
23 A blight known as the Roya fungus effectively wiped out
24 the coffee plantation and, with it, INAGROSA'S main
05:31:06 25 source of income.

05:31:09 1 Needless to say, INAGROSA was in financial
2 straits. Its cash flow had dwindled down to a few
3 hundred dollars. It had to lay off most of its workers.
4 It owed millions of dollars in loan payments to
05:31:21 5 Riverside and to the development bank and it stopped
6 paying its property taxes.

7 In fact, the 2014, Riverside had to make
8 one final loan, as you can see on the screen, to
9 INAGROSA just so that INAGROSA could pay off the debt to
05:31:32 10 the development bank. By the way, that's the last
11 investment that Riverside makes to INAGROSA. Full stop.

12 After this date there is not one other
13 dollar or cent that Riverside sends to INAGROSA. That's
14 why when you hear this morning about the supposed
05:31:53 15 \$17.5 million investment -- I think that was the number
16 that was used -- and there's references in the record
17 about a supposed pledge to invest up to \$60 million,
18 those are not investments.

19 How do we know they're not investments?
05:32:06 20 If you look at the Memorial, the Claimant, when it
21 listed its investments in the jurisdictional section of
22 the Memorial, it included several loans that Riverside
23 made between 1998 and 2014. There are no listed
24 investments beyond this date.

05:32:25 25 Now, this is where the story really picks

05:32:27 1 up. As Mr. Rondón tells it, he was desperate to find a
2 quick solution to rescue INAGROSA from financial
3 straits. That's when he had his Eureka moment. Eureka
4 of course is a Greek expression that means "I have found
05:32:42 5 it" and it is the expression that Archimedes famously
6 said when was sitting in a bath and he had a
7 mathematical innovation.

8 In this case, Mr Rondón's Eureka moment
9 was that INAGROSA would dedicate itself to growing and
05:32:52 10 exporting Hass avocados. Now, mind you, it is
11 undisputed that neither Mr. Rondón, nor anyone at
12 INAGROSA, had no experience growing or cultivating Hass
13 avocados before this Eureka moment. It's also
14 undisputed that no one in Nicaragua had ever cultivated
05:33:11 15 and exported Hass avocados. And it is undisputed that
16 there was never a technical study to determine whether
17 this venture was possible, let alone feasible.

18 But, as Mr. Rondón tells it, he just had a
19 hunch that it would work.

05:33:27 20 The story continues. Over the next
21 four years, Mr. Rondón and his workers supposedly
22 plotted -- cleared about 40 hectares in the plantation
23 and planted 16,000 trees that were supposedly all
24 grafted with Hass avocado saplings using seeds from
05:33:42 25 Costa Rica.

05:33:42 1 During this time, INAGROSA is extremely
2 cash poor as we've mentioned and INAGROSA'S only
3 investor, Riverside, is done investing in INAGROSA, so
4 INAGROSA sets out to try to secure investments from
05:33:58 5 outside investors. But they don't want to invest in the
6 project either.

7 Then in 2017, Riverside claims that it had
8 a very successful first harvest. So successful, that
9 INAGROSA decided, in 2018, that it would expand its Hass
05:34:11 10 avocado plantation in two ways. First, supposedly it
11 would clear another 200 hectares of land and plant trees
12 sometime in 2019. Then, years later, it would clear
13 another 760 hectares and expand the plantation to a
14 total of about 1,000 hectares.

05:34:30 15 According to Riverside, INAGROSA never got
16 the chance because of the invasion. However,
17 notwithstanding that it is undisputed in this record
18 that INAGROSA never even sold one Hass avocado as of the
19 valuation date in June 2018, Riverside's position to
05:34:47 20 this Tribunal is that as of that date INAGROSA had gone
21 from being penniless to being worth hundreds of millions
22 of dollars all because of this plantation and that's why
23 we call this story the avocado-to-riches story.

24 I assume everyone here is familiar with
05:35:05 25 the expression "the elephant in the room." It is a

05:35:09 1 metaphorical idiom in English for a significant problem
2 with a story that the storyteller does not want to
3 acknowledge. With this story we don't just have one
4 elephant in the room, we have at least five.

05:35:21 5 The first elephant in the room is that
6 there is no contemporaneous evidence supporting any part
7 of the story that I just told you, and what little
8 contemporaneous evidence exists in this record
9 undermines their story completely.

05:35:34 10 It is undisputed that all the key parts of
11 the story you just heard come entirely from the
12 testimony of Mr. Rondón and his employees. These are
13 individuals who have every reason to overstate the size
14 and scope of INAGROSA'S avocado plantation.

05:35:51 15 In fact, as you can see here on the
16 screen, the entire DCF model from Mr. Kotecha is based
17 on a letter that Mr. Rondón sent and that spoonfeeds all
18 the inputs to that model. I implore the Tribunal to
19 read this document because it is striking. There is not
05:36:07 20 one reference in this document to evidence that
21 corroborates the inputs in this letter. There are no
22 attachments to this letter. There are no substantive
23 footnotes that direct Mr. Kotecha to objective evidence
24 about the key parts of the avocado-to-riches story.

05:36:21 25 In fact, as Mr. Rondón confirms in his

05:36:23 1 testimony, this letter was crafted entirely based on
2 self-serving recollections made many years after the
3 events actually took place. And Mr. Kotecha effectively
4 took Mr. Rondón at his word.

05:36:38 5 So by now you may be thinking, how is it
6 that a hundred million dollar avocado company left
7 behind no paper trail? Where did all the documents go?

8 Well, in this arbitration Riverside has
9 essentially raised a "my dog ate my homework" defense.
05:36:56 10 You see, Riverside claims that there was contemporaneous
11 evidence at one point but that evidence no longer exists
12 because, for one, Riverside claims that INAGROSA, a
13 company that supposedly was worth hundreds of millions
14 of dollars kept all of its records -- most of its
05:37:12 15 records on paper and all of those papers were supposedly
16 destroyed at the invasion.

17 Riverside then claims that INAGROSA kept
18 no paper records outside of the Hacienda,
19 notwithstanding that we know for a fact that its three
05:37:24 20 main executives -- Mr. Rondón, Mr. Melvin Winger and
21 Mr. Russ Welty -- all lived outside of Nicaragua in the
22 United States.

23 To the extent that INAGROSA kept digital
24 records, Riverside claims that those records were in
05:37:38 25 computers or laptops that were either stolen or

05:37:41 1 destroyed at the Hacienda.

2 And Riverside claims that none of those
3 missing records were backed up on a cloud or server.

4 The email account that INAGROSA used, according to
05:37:51 5 Riverside, that account was hacked and is now
6 unrecoverable. And the third parties that received the
7 emails from INAGROSA containing business records
8 supposedly misplaced or lost many of those key records.

9 After Nicaragua noted in its
05:38:06 10 Counter-Memorial that this story is simply unbelievable,
11 Riverside said that it magically found some mislabeled
12 boxes of INAGROSA documents in some undisclosed location
13 and submitted approximately 200 exhibits with its Reply
14 Memorial containing INAGROSA'S corporate records,
05:38:21 15 financial records, business plans, and emails. None of
16 these new documents, however, support the
17 avocado-to-riches story, and in fact, many undermine it.

18 But Riverside maintains that's not their
19 problem. It's just the fact that all the ones that
05:38:37 20 support the story were the ones that were destroyed.

21 Nicaragua, however, submits that the more
22 plausible explanation here is that there are no
23 contemporaneous records supporting the avocado-to-riches
24 story because that story just isn't true.

05:38:52 25 Another way to know that the

05:38:54 1 avocado-to-riches story is not true is because there's
2 plenty of objective evidence in this record that refutes
3 it.

4 Let's start with 2014. Riverside claims
05:39:05 5 that INAGROSA initially had planted 16,000 trees all at
6 once across a 40-hectare plantation. But when we
7 pointed out that their own field report, the one that
8 you see on the screen, and the reason there's an R
9 number by the way is because that's the translation in
05:39:20 10 English, the original document was presented by
11 Claimant.

12 When we pointed out that this report said
13 that the trees were not planted all at once in 2014 but,
14 rather, they were planted across various stages over a
05:39:33 15 three-year period, they of course changed their story to
16 try to line up with this report.

17 Well, not exactly, because this report
18 also said that many of those trees that were planted in
19 this orchard were not even grafted with Hass avocado
05:39:46 20 saplings. So to the extent they harvested fruit at some
21 point, it was not Hass avocado.

22 The field report also does not support
23 Riverside's account that the Hass avocado experiment
24 went swimmingly. As you can see from the other excerpts
05:40:00 25 from this report, there were many, many issues that

05:40:05 1 INAGROSA experienced during its trial period when it was
2 trying to learn how to grow Hass avocados.

3 Now let's talk about the 2017 harvest.
4 This is a crucial part of the DCF model. Because
05:40:19 5 INAGROSA never sold one Hass avocado, Mr. Kotecha
6 essentially takes the allegations about the successful
7 2017 harvest and uses that as the basis or the
8 foundation for which he decides that you can project
9 future cash flows.

05:40:34 10 So what's the evidence in this record that
11 Claimant has submitted to show that its 2017 harvest was
12 successful? And by the way, before I get into it,
13 specifically, if you look at the allegations they make,
14 they say the reason it was successful is because each
05:40:49 15 tree that harvested in 2017 bore about 20 kilos of Hass
16 avocado fruit. That's how they measured "successful."

17 So let's see what we have in the record.
18 We have in Mr. Rondón's first witness
19 statement, he submitted a picture, what appears to be a
05:41:07 20 halved Hass avocado that presumably was planted or
21 harvested in 2017, although the picture -- with the
22 picture, it's impossible to know for sure. We have a
23 three-second video that was submitted that appears to
24 show four bottles that presumably contained avocado oil.
05:41:25 25 Again, with the video itself, it's impossible to know.

05:41:29 1 We have a lab sample of one avocado that
2 was presumably harvested at the Hacienda, and we have
3 some pictures of crates and workers that appear to
4 contain some Hass avocados. Again, none of this
05:41:44 5 evidence demonstrates that each of the trees that
6 harvested in 2017 bore 20 kilos of Hass avocado fruit,
7 which, again, is the allegation on which Mr. Kotecha
8 bases his entire DCF model.

9 What is missing from this record that you
05:42:00 10 would expect to see if there was a successful harvest?
11 Well, there are no pictures of the avocado trees right
12 before they were harvested that would show all the kilos
13 of fruit that were supposedly on the tree. There are no
14 field reports memorializing the harvest period. There
05:42:18 15 are no contemporaneous emails describing the harvest.
16 There's no evidence of the facilities or equipment that
17 would have been needed in order to be able to collect
18 the 20 kilos per tree number that they're suggesting.
19 There's no evidence as to what -- other than the
05:42:34 20 3-second video, it's unclear what they did with the
21 20 kilos per tree. And if you take their allegation at
22 face value, we're talking about thousands and thousands
23 of kilos of Hass avocado fruit. Where did it all go?

24 There's no paper trail showing a
05:42:49 25 significant uptick in labor costs during the 2017

05:42:53 1 harvest period, which is what one would expect if it was
2 a successful harvest. And as the Tribunal -- as we will
3 demonstrate throughout this hearing, the evidence
4 actually is to the contrary.

05:43:09 5 Now I want to talk about the expansions.
6 As you can see on the screen, this is a chart taken from
7 one of the expert reports from our damages experts,
8 Credibility. As you can see, what they're plotting is
9 this is the amount of trees that -- on the left side you
05:43:22 10 see amount of trees that were at the Hacienda, according
11 to Riverside, as of the valuation date. Roughly 17,000.

12 If you look on the right, these are the
13 trees that, according to Mr. Kotecha's model -- which
14 again, just takes the inputs from the letter that
05:43:35 15 Mr. Rondón sent him -- this is how many trees they
16 projected would have been planted in 2021 but for the
17 invasion.

18 Now, I submit to you, members of the
19 Tribunal, there is not one document in this record that
05:43:48 20 supports what this chart demonstrates. Again,
21 everything comes from the testimony of Mr. Rondón and
22 his employees. There are no technical studies in this
23 record that demonstrate that what you're seeing here was
24 possible. No feasibility reports. No soil samples.
05:44:05 25 Not even a back-of-the-napkin drawing on where these

05:44:08 1 expansions were supposed to occur.

2 There's also objective evidence that
3 refutes this premise. For starters, we know that the
4 expansion would have been illegal because more than half
05:44:22 5 of the area at Hacienda Santa Fé contains land where
6 commercial activity would have been prohibited. You can
7 see these protected areas on the left side of the map --
8 left part of the slide in light purple. These areas
9 include about 557 hectares of forests and about
05:44:42 10 30 hectares of land that's within a 200-meter marginal
11 strip. These are areas where, without permits, you're
12 not able to harvest the soil and plant avocados, for
13 instance.

14 By the way, on the right we see a close-up
05:45:01 15 of where the 40-hectare avocado plantation was
16 supposedly planted. Again, we know this just from using
17 satellite imagery -- they've never actually given
18 coordinates or shown exactly where it was planted, but
19 we were able to use satellite imaging to be able to
05:45:13 20 understand where -- over the period of time, where the
21 soil had been treated, and that's roughly the area that
22 you see in dark purple, that's outlined in dark purple.

23 The reason why there's dark green within
24 that, that's the area that's either part of the forest,
05:45:29 25 meaning it's part of the forest soil that cannot be

05:45:32 1 cultivated without some sort of permit, or it's within
2 that 200-meter marginal strip.

3 So, again, not only would the expansion
4 have been illegal, but it appears that what they did
05:45:43 5 between 2014 and 2016 was also illegal.

6 Another reason the Tribunal can reject the
7 expansion allegation is because all the evidence in the
8 record demonstrates that INAGROSA was not looking to
9 expand its Hass avocado plantation. Rather, the
05:45:59 10 evidence shows that INAGROSA was seeking to designate
11 the Hacienda Santa Fé as a private wildlife reserve.

12 Let's go over this timeline. In 2015,
13 INAGROSA applied for this designation with MARENA, which
14 is the local environmental authority. In 2015, a little
05:46:16 15 bit later it submits a rapid ecological study that
16 supposedly supports its application. In 2016, it
17 applies again. A little bit later it submits a plan
18 that says this is how I will preserve and protect the
19 Hacienda Santa Fé if you're able to designate it as a
05:46:34 20 private wildlife reserve.

21 Then in December 2016, MARENA sends
22 inspectors to go see if this plan is feasible. And then
23 in February 2018, before the valuation date, MARENA
24 designates Hacienda Santa Fé as a private wildlife
05:46:50 25 reserve. You may be wondering what does that all mean?

05:46:53 1 Well, as we delve into this extremely in a lot of detail
2 in our pleadings, we submitted reports from MARENA,
3 Ms. González from MARENA, she submitted two witness
4 statements. We also have the expert report of our legal
05:47:08 5 expert, Dr. Byron Sequeira. And what they all say is
6 private wildlife reserves, the reason why if you're a
7 private property owner, the reason you would get one is
8 you'd want the designation so you can get essentially
9 economic perks. You get tax benefits.

05:47:23 10 Also, many of these private wildlife
11 reserves, they open ecotourism businesses where they
12 make a modest amount of income by having people come
13 over to observe the wildlife such as the endangered
14 birds or jaguars, et cetera. That's exactly what
05:47:41 15 Mr. Rondón and INAGROSA, according to the record that we
16 do have, that's what they were planning to do. But
17 don't just take my word for it. Let's look at the
18 application that Mr. Rondón and INAGROSA submitted in
19 2016.

05:47:54 20 This is the application that was
21 ultimately granted in 2018. They say in this
22 application that the reason they wanted to seek the
23 designation was to preserve the forest area, to protect
24 the water resources, to protect the fauna and flora and
05:48:11 25 all the animals that lived in the forest.

05:48:15 1 INAGROSA also said we're seeking to
2 prevent any logging, and we seek to preserve the water
3 resources which are abundant in this Hacienda.

4 Now, I implore you, members of the
05:48:26 5 Tribunal, when you hear the stories throughout this
6 hearing about we were going to clear this entire
7 Hacienda, a thousand hectares, which is roughly
8 90 percent of the Hacienda, we were going to clear all
9 that so we could plant avocado trees. Clearing all that
05:48:43 10 would have included, of course, clearing the 500 or so
11 hectares of forest, which is directly contrary to what
12 INAGROSA said it wanted to do. It would have also
13 entailed clearing brush. You saw from the videos how
14 much brush, how much vegetation. It's very dense.

05:48:56 15 Doing that would affect and disturb biodiversity at the
16 Hacienda. You simply cannot, on one hand, agree that
17 INAGROSA was seeking to designate its Hacienda as a
18 private wildlife reserve, as we know from the objective
19 record, and at the same time fit the allegations that
05:49:10 20 INAGROSA also was trying to expand a 40-hectare
21 plantation into a \$100 million Hass avocado business.

22 And if that weren't enough, they also
23 allege that in the process of making that expansion,
24 INAGROSA would have logged the trees and sold the lumber
05:49:25 25 to Indiana, which again, directly contrary to what

05:49:30 1 INAGROSA said it would actually do.

2 Now I'm going to talk a little about
3 permitting. I'm speaking to a very seasoned Tribunal.
4 The Tribunal understands that nearly every business,
05:49:42 5 regardless of where located, requires permits to be
6 operational, especially when it comes to agricultural
7 businesses which exploit natural resources, and
8 especially in Latin America, which unfortunately can
9 sometimes be very bureaucratic in its regulation of
05:49:57 10 businesses.

11 Put differently, if you don't have any
12 permits, you don't have a business. Now, you heard this
13 morning that -- from Riverside's attorney that INAGROSA
14 just simply had no idea -- after 20 years, it didn't
05:50:13 15 know that this is something that they needed and then
16 they said, Well, you know -- and also this comes from
17 their papers. They say, Well, it's our understanding we
18 didn't need any permits until we were operational. It's
19 also our understanding that we would have obtained all
05:50:27 20 the permits in time to benefit from the 2018 harvest,
21 and it's also our understanding that at the end of the
22 day, the worst we would have gotten for not having
23 permits is a slap on the wrist. That's the position
24 that Riverside has taken in this case. I'd like to go
05:50:43 25 through one at a time.

05:50:45 1 First, let's go through the idea that
2 there were no permits needed for the preoperational
3 activities. I'm not going to spend a lot of time going
4 through this, but just at a high level, these are the
05:50:56 5 activities that they allege that INAGROSA was carrying
6 out between 2014 and 2018. I've included here the cites
7 to the witness statements from the permitting experts
8 that we've submitted, all of which explain why those
9 activities trigger or invoke certain permitting
05:51:12 10 regulations and laws that would have required INAGROSA
11 to go and get a permit before it actually did what it
12 did. Just to pick one, let's talk about the hydrology
13 resources.
14 Riverside almost brags about how INAGROSA
05:51:26 15 had so much water from its rivers in the Hacienda that
16 you would use all that to irrigate the 40-hectare
17 plantation. That's not INAGROSA'S water. That's the
18 water of the State. And there's a reason why you can't
19 use water for commercial purposes without a permit.
05:51:42 20 Because if you contaminate or you're using too much of
21 it, it obviously would affect not only the biodiversity
22 and the wildlife that lives inside the water but also
23 your neighboring communities, your neighboring
24 properties. So, again, these are all handled in-depth
05:52:01 25 in our papers, and I'm happy to answer any question you

05:52:03 1 may have, but for the sake of time, I'm going to move
2 on.

3 Let me get to this next slide. Now,
4 INAGROSA -- sorry, Riverside claims that INAGROSA had
05:52:14 5 no -- it admits INAGROSA had absolutely no permits as of
6 June 16, 2018, but they submitted an expert report from
7 a legal expert, Dr. Renaldy Gutiérrez, who said that as
8 long as they had it before they became operational in
9 2018, they would have been fine. And you've heard the
05:52:31 10 same this morning. He said as long as we had it by the
11 time we were ready to sell an avocado, we would have
12 been fine.

13 If you look at Riverside's telling of the
14 story, they were about to do that as early as June 30,
05:52:44 15 2018. That's when Mr. Rondón says that the Hass avocado
16 harvest out of Hacienda Santa Fé would have begun in
17 2018. So let's test this theory.

18 In order for INAGROSA to be able to take
19 the avocados that it started picking as of June 30, 2018
05:53:04 20 and then export them to Costa Rica, as was the supposed
21 plan, the following had to happen.

22 First, they had to apply and obtain
23 phytosanitary permits. These are the permits where the
24 agencies see -- go to your farm and they look to see the
05:53:21 25 status or the state of your fruit, of the plants, of the

05:53:24 1 nurseries to make sure you don't have some sort of
2 plague. Because obviously if there's a plague and you
3 sell that into the market, it could have a devastating
4 effect. So you're not allowed to sell an avocado unless
05:53:36 5 and until you obtain this permit.

6 As we submitted in our papers,
7 Mr. Moncada, who is from the agency, the phytosanitary
8 agency, he explains that this takes time. It takes
9 visits, site visits, it needs reports and studies and
05:53:50 10 it's not a guarantee that you're going to get it.

11 Okay. Let's assume they got that. What's
12 next? Well, they had to go and obtain exportation
13 permits. All right. What else? Well, they also had to
14 purchase the equipment that was needed to cool, process,
05:54:03 15 box and ship the avocados. Okay. What else? Well,
16 after they did all that, they also had to negotiate the
17 commercial agreements with the markets in Costa Rica,
18 which they were supposedly going to put their avocados
19 up for sale. Now, that sounds like a lot, but it sounds
05:54:20 20 even worse when you realize that they only had about 30
21 to 40 days to do all that.

22 How do I know that? Well, the only Hass
23 avocado expert in this arbitration has submitted a
24 report that said that it's well-known in the Hass
05:54:31 25 avocado industry that once you pick an avocado, it has

05:54:34 1 about 30 to 40 days before it goes bad. And that's with
2 cooling and proper handling. Now, we know that this
3 mission was impossible and, in fact, it failed, because
4 as you can see from this slide, these are emails. These
05:54:49 5 are actually very, very instructive emails. We'd ask
6 the Tribunal to look at these closely. These are some
7 of these missing emails that then magically appear in
8 the Reply Memorial. From Mr. Luis Gutiérrez to Carlos
9 Rondón. They're dated in July. So basically what's
05:55:05 10 happening here is the harvest has begun, and even though
11 the invasion is sort of underway, they're still picking
12 the avocados. And when Mr. Gutiérrez, who is the chief
13 agronomist -- he's not some low-level employee. He is
14 the right-hand person with respect to this Hass avocado
05:55:20 15 project. He's telling his boss, Boss, these are
16 starting to get dark. I think they're going to get ripe
17 in a couple of days. I don't have anything to even -- I
18 don't have any boxes or any crates or anything to put
19 these in. What do I do?

05:55:32 20 Next email, again: These are starting to
21 get dark, I don't know what to do. I think we're going
22 to lose them. Can we sell them? Is there anything that
23 we can do?

05:55:42 24 Now, what these documents demonstrate, of
25 course, is that this is not a \$100 million avocado

05:55:45 1 business. They didn't even have any boxes. They
2 actually had these avocados stored on the warehouse
3 floor on top of paper bags. They had absolutely no plan
4 in place as to what to do with this harvest, which,
05:55:59 5 again, is exactly what the Kotecha DCF model is entirely
6 based on the idea that they would have started profiting
7 from the Hass avocado plantation in 2018, and as these
8 documents show, that was not the case.

9 I want to quickly talk about sanctions.
05:56:17 10 I'm not going to belabor the point. We've submitted,
11 again, numerous witness statements from permitting
12 experts, all who say if you do a few of these violations
13 you might get some penalties or fines, but if you're a
14 habitual violator of these permit regulations, the
05:56:39 15 sanctions could be severe. You could even be subject to
16 forced closure.

17 Of course, the question is how come this
18 didn't happen in real time? There's a very simple
19 answer. They never told Nicaragua, during the relevant
05:56:50 20 period, that they were pursuing these activities. We
21 learn about this after the fact by reading Riverside's
22 memorials.

23 Let me get to the third elephant in the
24 room. The reason that Mr. Kotecha's DCF model projects
05:57:07 25 such high damages is because it assumes that starting in

05:57:09 1 2022, INAGROSA would have been able to export to the US
2 market. Why is that important? Well, as anyone in
3 California would tell you, we are obsessed here in the
4 United States with Hass avocados. We love our avocado
05:57:23 5 toast, our guacamole. The US is by far the largest Hass
6 avocado consumer market. Therefore, the prices are very
7 lucrative, and those are the prices Mr. Kotecha relies
8 upon when fashioning his model.

9 There's just one problem with that
05:57:39 10 assumption. There's actually a ban, a US ban, on all
11 Nicaraguan avocado exports. And it's because of this
12 fruit fly that you see on the screen. We talk about it
13 at length. We had permitting experts that explained
14 this at length. They're not called to this hearing
05:57:55 15 because they don't have an answer for this.

16 Well, that's not true. They do have an
17 answer for this. They say, Well, talks were under way
18 with our Senator's office in Colorado, and I'm sure that
19 over time we would have gotten this ban lifted. Let me
05:58:11 20 quickly jump to what those discussions show.

21 If you look at the screen, these
22 discussions were had in October 2016. This is an aide
23 for Senator Bennett of Colorado. And if you read the
24 whole email chain, and we implore that you do, because
05:58:27 25 these are actually very illuminating documents,

05:58:31 1 Mr. Rondón and the CFO say to the aide, Hey, we're
2 thinking about exporting Hass avocados from Nicaragua to
3 the US. Can we do that? After some back and forth they
4 respond, No, you can't. There's a ban. You can't
05:58:44 5 export it. And then they say, By the way, if you want
6 to lift the ban, really there's no use talking to us.
7 We're not the right people. In order to get the ban
8 lifted, you don't go to the Senator, you don't go to any
9 US agency. You have to go to Nicaragua, and you have to
05:58:59 10 request their phytosanitary agency to start a
11 state-to-state dialogue with APHIS, the US phytosanitary
12 agency, in order to get the ban lifted.

13 Just because -- by the way, just because
14 the ban or the dialogue is open doesn't mean the ban is
05:59:15 15 going to get lifted. We have -- on the right of the
16 screen as you see here, we have testimony from
17 Dr. Duarte, from Mr. Rosales, all of whom have
18 experience in these types of dialogues, and they say it
19 can take ten plus years and it's possible that you never
05:59:30 20 get the ban lifted at all. I want to leave the Tribunal
21 with one point here. The reason we highlighted the date
22 of this email is because this is roughly a year and a
23 half before the invasion. This is in October 2016.

24 You would expect that if they had a
05:59:47 25 hundred-million-dollar avocado business and they really

05:59:49 1 thought they had confidence that they could lift the ban
2 somehow, you would think that after this email, there
3 would be follow-up. There would be a paper trail saying
4 let's talk to that agency, let's get on the phone with
06:00:00 5 Nicaragua ASAP. There's nothing in this record. This
6 is literally where the record paper trail on this issue
7 ends.

8 So when you hear from Mr. Kotecha or any
9 witnesses in this hearing, that Hey, this ban, no
06:00:15 10 problem, we would have gotten it lifted, I submit that
11 there's absolutely zero evidence to support that
12 contention.

13 This brings me to my fourth elephant in
14 the room. No experience or know-how.

06:00:33 15 Let me go back. INAGROSA had absolutely
16 no experience or know-how in cultivating Hass avocados
17 before they tried their hand at it in 2014. This fact
18 is undisputed, yet we're supposed to believe that they
19 can learn on the fly, and in just a couple of years,
06:00:51 20 they could strike it rich with a hundred-million-dollar
21 Hass avocado business.

22 In actuality, the record confirms that
23 INAGROSA'S lack of experience and know-how negatively
24 affected their plantation. Here you can see a report
06:01:05 25 from field workers literally pleading to Mr. Rondón and

06:01:09 1 Riverside and INAGROSA saying, We need some training.
2 We don't know what we're doing.

3 This report also identifies, as you can
4 see on the bottom excerpt, that there were myriad issues
06:01:22 5 that the field workers were experiencing including root
6 rot and including this fungus that you can see here,
7 which I'm not going to try to pronounce. By the way,
8 that fungus, when we have -- when you look at the expert
9 analysis of our Hass avocado expert which, again, is the
06:01:41 10 only Hass avocado expert, he explains, Yeah, I know why
11 they have that root rot and I know why they have that
12 fungus. It's because they were doing the wrong

13 technique. Every experienced Hass avocado expert knows
14 that's not how you would -- they were using the wrong
06:01:53 15 seeds, they were using the wrong techniques in trying to
16 cultivate this. That's why they're getting that fungus.

17 It should speak volumes to this Tribunal,
18 we submit, that Riverside has not called Dr. Duarte to
19 testify at this hearing. Think about it. Riverside's
06:02:13 20 damages case hinges almost entirely on the feasibility
21 of INAGROSA'S avocado plantation, yet Riverside did not
22 call Dr. Duarte to testify, nor put up any avocado
23 expert of its own. That should tell you all you need to
24 know about their avocado-to-riches story.

06:02:30 25 One last thing. I think I mentioned this

06:02:33 1 before, but it's worth mentioning again. There has
2 never been a Nicaraguan company that has cultivated and
3 exported Hass avocados, full stop. Why is that? Well,
4 various reasons.

06:02:56 5 Let's start with the fact that they can't
6 reach the US market, as I've already explained, which is
7 sort of the goal for a lot of Hass avocado exporters.
8 There are other reasons. It's a very finicky fruit.

06:03:11 9 Doesn't just grow anywhere. There needs to be the right
10 climate conditions, altitude, soil, wind. They also
11 have very short shelf life, as I've already explained.

12 There's a lot of logistical issues. It's not just being
13 able to grow one. It's how are you going to get it from
14 your garden or your plantation to the supermarket in
06:03:26 15 time for the consumer to buy it?

16 Upon this backdrop, there's just no reason
17 to assume that INAGROSA would have become a global Hass
18 avocado giant and the first ever out of Nicaragua when
19 they had absolutely no experience or know-how.

06:03:40 20 This brings me to my last elephant in the
21 room. If INAGROSA was truly the can't-miss investment
22 that Riverside and Mr. Kotecha claimed that it was, then
23 why is it that no one invested in their business?

24 Now, members of the Tribunal, I'm going to
06:03:54 25 put up the closed session because I'm about to enter

06:03:59

1 into a document that's been designated confidential.

2 MS. CONOVER: The session has been closed.

3 MR. MOLINA: Let's go over some undisputed

4 facts that are in this record. Again, as I've already

06:04:18

5 mentioned, INAGROSA owed Riverside millions of dollars

6 in unpaid loans plus interest. The cite to the record

7 there is to a promissory note which is really

8 fascinating. Mr. Winger in 2014, when Riverside makes

9 the last investment in INAGROSA, essentially says this

06:04:32

10 is the last investment and, by the way, you haven't paid

11 us back at all and, by the way, we want it all back plus

12 8 percent interest compounded monthly over a five-year

13 window. So we really think that's an illuminating

14 document. We'd ask the Tribunal to review it. We also

06:04:52

15 know they owe property taxes.

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06:05:30 1 And now I can open the session.

2 MS. CONOVER: The live stream has resumed.

3 MR. MOLINA: Here's another undisputed
4 fact in the record.

06:05:47 5 PRESIDENT: Just to remind you,
6 Mr. Molina, you have some ten minutes left.

7 MR. MOLINA: Thank you, Mr. President. I
8 think I will --

9 The undisputed fact that you see on the
06:05:56 10 screen is simply what I've already mentioned. If you
11 look at the record -- and it's something we're going to
12 cover at this hearing -- INAGROSA was so cash poor, it
13 had no money coming from Riverside, it tried
14 desperately, and I mean desperately, to obtain outside
06:06:09 15 funding from outside investors. It just never did.

16 Now, why did it not get funding? Probably
17 because its pitch sounded a little bit like a scam.
18 According to Mr. Kotecha's DCF model, INAGROSA would
19 have achieved a profit margin of 95 percent. As you
06:06:27 20 know, profit margin represents the portion of a
21 company's sales revenue that it gets to keep as a
22 profit. Keep in mind, INAGROSA never sold even one Hass
23 avocado. Had no facilities to store, cool, process or
24 ship the avocados. It was located in a country that had
06:06:43 25 never exported Hass avocados. And, more importantly, as

06:06:48 1 you can see on the screen, the best Hass avocado
2 producers in locations and in areas where there is an
3 infrastructure in place to export Hass avocados, they at
4 best get a 19 percent profit margin. It's no wonder
06:07:04 5 that everyone that saw the numbers here said no.

6 You see, members of the Tribunal, at the
7 end of the day, we do not dispute that INAGROSA tried to
8 plant some avocado trees. We don't dispute that some of
9 those trees might have been grafted with Hass avocado
06:07:16 10 saplings. We don't even dispute that some of those
11 trees bore Hass avocado fruit. Our position is simply
12 this was not a Hass avocado business that was worth
13 hundreds of millions of dollars. At best, it was what
14 INAGROSA represented it was, a Hass avocado project, a
06:07:39 15 project that failed.

16 Against this backdrop, I'm just going to
17 make some quick points. This is a very seasoned
18 Tribunal. I just wanted to quickly, as we put in our
19 papers, the investment -- our jurisprudence on this is
06:07:54 20 pretty unanimous. When you have a nonoperational
21 company like INAGROSA that had no permits and never sold
22 one avocado, DCF model is the exception; it's never the
23 rule.

24 To overcome that or to fit into that
06:08:06 25 exception, you have to show sufficient objective

06:08:10 1 criteria. These are the criteria. None of these is
2 here.

3 So what happens when you have subjective
4 and not objective criteria -- inputs into the DCF model?
06:08:24 5 As we discuss, you get garbage in, you're going to get
6 garbage out.

7 Just very quickly, I want to talk a little
8 bit about this alternative -- this land valuation remedy
9 that you heard today.

06:08:41 10 Now, this remedy is offered by
11 Mr. Kotecha, in part, because Riverside contends that
12 the Hacienda was wholly expropriated by the protective
13 order. And for all the reasons my colleagues have said,
14 that position, we think, is unfounded.

06:08:58 15 There's another reason that this is raised
16 by Riverside is because they make several allegations in
17 this record that the Hacienda was essentially totally
18 destroyed by the invasion. You see these allegations in
19 this document, which is that letter from Mr. Rondón that
06:09:14 20 spoon-feeds inputs to Mr. Kotecha. In that letter are
21 various things. He says, look, the soil was completely
22 destroyed, the forest was completely deforested.

23 Basically anything of value, equipment, plantations,
24 buildings, all of it was gone, according to this letter,
06:09:30 25 with, again, no citations.

06:09:33 1 Well, why is that unfounded? Well, when
2 you look at the actual contemporaneous record, this is
3 an inventory. My colleague mentioned this document
4 earlier. This is after the invaders were evicted in
06:09:47 5 August '13. The police called Mr. Gutiérrez, who was at
6 that time the administrator of the Hacienda for
7 INAGROSA, called him to the premises, and said
8 everyone's out, let's take an inventory, see what the
9 damage was.

06:09:59 10 They went through. We'd ask this Tribunal
11 to read this document closely. We have the English
12 version that we created at the bottom. And basically,
13 when you read this document, here's what you're not
14 going to find.

06:10:13 15 You're not going to find any allegations
16 there that the soil was destroyed, that the forest was
17 completely deforested or anything that Riverside is
18 saying now. Instead, you see basically the type of harm
19 that you would expect to see when you have a few hundred
06:10:26 20 unwelcome guests at your house. Food is missing, the
21 cars are damaged, some of the electronics is broken. So
22 that model doesn't work.

23 I'm going to skip through moral damages
24 because I think our papers more than cover this. I'm
06:10:48 25 also just going to quickly note that our experts at

06:10:50 1 Credibility, because they basically inherited this
2 record where there's nothing objective through which you
3 could even possibly dream of doing a DCF model, so
4 they've taken this, they've scrutinized the model from
06:11:03 5 Mr. Kotecha, they've arrived at the conclusions that
6 I've summarized today and they said, okay, fine, but
7 what methods could this Tribunal use to allocate some
8 sort of damage award to the Claimant in the event that
9 it finds that Nicaragua was somehow responsible for the
06:11:21 10 invasion?
11 These are four scenarios. They're teed up
12 and summarized expressly in the second report. I'm not
13 going to get into them with too much specificity, but
14 suffice to say, even Credibility notes, these actually
06:11:36 15 don't work out either because even if the members of
16 this Tribunal were to award something like those
17 scenarios, it would still have to offset that award with
18 the nearly \$200,000 that INAGROSA still owes from
19 property taxes, the rising bill it has for the security,
06:11:53 20 the tens of thousands of dollars that it could probably
21 face if there were permitting sanctions issued. Of
22 course, there's the whole issue of contributory
23 negligence. You heard my colleagues discuss how
24 everyone was out on August 13th, the police brought them
06:12:09 25 in August 14th, and they basically did nothing and that,

06:12:12 1 of course, led to another invasion where we were left
2 again to clean up the mess and pay the bill.

3 So these don't work, and that's why the
4 primary conclusion of our experts is there should be no
06:12:23 5 damages.

6 Very quickly -- and I hope I have time. I
7 just wanted to summarize my presentation here by showing
8 what does -- I've already talked about the
9 avocado-to-riches story, so I guess the question the
06:12:40 10 Tribunal might have is what does the record show?

11 Well, here's what it shows.

12 It shows that in 2013, there was a Roya
13 fungus, and it did devastate the coffee plantation.
14 That part is true. It does show that INAGROSA did its
06:12:53 15 best to try to come up with some miracle to try to save
16 its business, but it also shows that that attempt
17 failed. Again, it showed that it was super cash poor.
18 It was desperate to get money. It got none. And it
19 shows that basically by 2016-2017, it essentially gives
06:13:09 20 up with any commercial activity, and as the record
21 shows, they basically were trying to get their Hacienda
22 designated as a private wildlife reserve in the hopes
23 that it could maybe lead to an ecotourism business, and
24 they could get some perks along the way.

06:13:23 25 With no commercial activity at the

06:13:25 1 Hacienda, very few people are at the Casa Hacienda,
2 people drive by, they notice it, no one's there.
3 There's a couple guards at the guard house, that's it.
4 And that's why you have the invasions that we spent a
06:13:37 5 lot of time this morning discussing.

6 And I know my colleagues quickly have said
7 already that the story keeps changing. I thought this
8 slide would summarize it. What you're heard today is
9 initially in their Memorial, Claimant said, hey, the
06:13:50 10 government sent paramilitaries to invade us. But now as
11 you've heard, their story is, well, they should have
12 sent the military to protect us.

13 Initially they said, hey, everything is
14 deforested. Of course, they've now walked that back now
06:14:03 15 that we have video evidence. They say all the records
16 and emails are gone. Again, I've covered this. Now
17 they all show up.

18 The trees, I mentioned this already. They
19 talk in their first Memorial, they said everything was
06:14:17 20 ready to go. We were on the cusp of selling avocados.
21 We pointed out there were no permits and they said, oh,
22 that's right, yes, we had no permits. They said they
23 would have exported to the US by 2020. Now they've
24 walked that back and literally changed INAGROSA'S
06:14:34 25 business plans mid arbitration. And, of course, they

06:14:35 1 started with saying, hey, we think that damages were
2 644 million, and they've reduced that now by more than
3 400 million.

4 So this is the last slide. I'm going to
06:14:49 5 end the presentation the way we began it with a visual
6 of Hacienda Santa Fé. This Hacienda is going to be the
7 star of this hearing. It was the site of the invasion
8 that the parties dispute. It is the subject of the
9 protective order that the parties also dispute, and it
06:15:03 10 is the setting for the avocado-to-riches story that
11 you'll no doubt hear the witnesses and experts from
12 Riverside tell.

13 As you've heard from my colleagues earlier
14 today, despite Riverside's claims that this Hacienda is
06:15:17 15 a magical piece of property that has the perfect
16 conditions to cultivate a multi-hundred-million-dollar
17 avocado plantation, the Rondón family has routinely left
18 it in a state of abandonment and has shown no interest
19 in getting it back.

06:15:32 20 Needless to say, we think that Riverside
21 never wanted you to see this video because it refutes --
22 sorry, I should also say they also fought us to try to
23 submit this video into evidence, as the Tribunal may
24 remember, and we think the reason they fought us is
06:15:47 25 because we think it speaks for itself. It shows that

06:15:49 1 the Hacienda is a sprawling, densely forested place
2 vulnerable to invasion if there's no security. It shows
3 it would have been impossible for a handful of police
4 officers from San Rafael del Norte to rid it of hundreds
06:16:03 5 of armed invaders, especially during the 2018 protests.

6 It shows is that the avocado-to-riches
7 story is, in fact, not true because it would have been
8 impossible to cultivate a 1,000-hectare plantation on
9 this property with all the forests and all the hilly
06:16:16 10 conditions. And, of course, it would have been illegal
11 because what you're seeing on the screen has already
12 been designated as a private wildlife reserve.

13 So with that, unless the Tribunal has any
14 questions, I believe that ends the presentation.

06:16:30 15 PRESIDENT: Thank you very much. No
16 questions from the Tribunal. So that concludes the
17 program for today. Thank you all. We will resume
18 tomorrow morning at 9:00 with the examination of
19 Ms. Winger. Thank you very much.

06:16:51 20 (Hearing adjourned at 6:16 p.m.)

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<p>MR. APPLETON: [32] 6/15 10/6 10/16 11/8 18/1 19/16 19/21 19/25 20/7 20/15 20/23 65/5 65/9 65/14 65/21 66/1 94/18 94/22 96/19 97/10 111/4 112/10 112/13 113/25 151/1 151/7 151/12 151/15 175/1 176/21 177/1 177/11</p> <p>MR. MOLINA: [4] 246/25 276/3 277/3 277/7</p> <p>MR. RAMOS-MROSOVSK Y: [16] 196/25 208/18 210/7 210/11 210/18 212/12 217/22 217/25 218/4 218/15 218/19 219/12 220/18 228/2 245/17 245/22</p> <p>MS. CONOVER: [23] 19/13 19/18 19/23 20/13 20/18 65/2 65/8 113/23 196/18 246/18 276/2 277/2</p> <p>MS. GONZÁLEZ: [19] 7/22 10/8 139/10 139/19 150/8 150/15 151/20 175/11 175/15 175/20 176/25 177/9 177/19 193/23 194/2 194/19 196/11 196/15 196/21</p> <p>PRESIDENT: [55] 5/8 7/19 8/9 10/9 11/5 20/3 20/6 65/11 65/20 65/23 94/16 94/20 96/14 96/25 110/23 112/7 112/11 138/21 139/5 139/16 150/5 150/14 151/3 151/11 151/14 151/17 175/12 175/18 177/13 193/17 193/24 194/3 196/4 196/13 196/23 208/13 209/19 210/9 210/12 212/11 217/17 217/23 218/2 218/6 218/16 219/8 220/17 228/1 245/12 245/20 246/11 246/20 246/23 277/5 285/15</p> <p>SPANISH COURT REPORTER: [1] 17/23</p> <p>\$</p> <p>\$100 [2] 264/21 269/25</p> <p>\$100 million [2]</p>	<p>264/21 269/25 \$166 [1] 135/9 \$166 million [1] 135/9 \$168 [1] 248/2 \$168 million [1] 248/2 \$17.5 [2] 130/9 251/15 \$17.5 million [2] 130/9 251/15 \$200,000 [1] 281/18 \$241 [2] 132/24 247/18 \$241 million [2] 132/24 247/18 \$60 [1] 251/17 \$60 million [1] 251/17 \$60,000 [1] 250/9 \$9.5 [1] 129/11 \$9.5 million [1] 129/11</p> <hr/> <p>'13 [1] 280/5 '18 [1] 172/1 '20 [1] 155/20 '21 [1] 155/20 '90s [9] 155/8 155/15 157/22 180/14 181/13 192/4 192/22 194/20 195/16 's [1] 222/19</p> <hr/> <p>0</p> <p>0007 [1] 15/7 0065 [1] 41/3 0131 [1] 74/13 0168 [1] 48/2 0177 [1] 167/23 0192 [2] 56/16 76/25 02 [2] 17/15 44/15 0284 [2] 46/14 46/22 035 [1] 39/12 05 [2] 17/15 45/3 0535 [1] 54/10 0539 [1] 53/12 0546 [1] 123/11 06 [2] 108/3 115/19 067 [1] 59/11</p> <hr/> <p>1</p> <p>1 percent [1] 247/10 1,000 hectares [1] 253/14 1,000-hectare [1] 285/8 1,142.5 hectares [1] 145/24 1.2 [1] 81/12 1.5 million [1] 130/10</p>	<p>1.86 [1] 147/25 10 [9] 41/6 65/12 81/14 81/16 89/19 138/13 225/4 227/14 245/15 10.2 [2] 223/16 225/3 10.3 [4] 66/20 81/17 83/18 89/2 10.4 [3] 66/20 89/3 110/10 10.4's [1] 230/19 10.5 [14] 37/1 66/18 66/22 81/9 85/7 89/3 90/22 91/1 114/5 117/14 120/4 128/7 230/24 245/16 10.5's [1] 230/20 10.6 [14] 88/8 88/10 197/24 198/8 206/21 224/2 227/4 228/24 229/11 236/2 237/1 245/14 245/15 245/18 10.7 [4] 67/5 120/16 128/1 133/7 100 [1] 228/9 100 percent [4] 7/13 120/11 231/20 248/21 102 [1] 158/17 105 [1] 146/8 11 [12] 8/23 9/9 41/13 49/6 65/12 65/13 69/15 70/8 89/20 156/8 156/11 246/19 11.42 [2] 145/24 153/24 110 [1] 56/11 114 [1] 43/13 116 [1] 41/23 119 [1] 45/3 11:00 [1] 65/15 11:15 [1] 65/8 11th [2] 70/15 70/17 12 [1] 42/14 120 [1] 45/3 1200 [1] 173/20 1202 [1] 110/14 121 [1] 27/17 1210 [1] 110/14 1224 [1] 11/17 125 [1] 49/16 13 [5] 45/4 141/19 178/18 179/13 180/22 1310 [1] 77/5 1384 [2] 242/23 244/8 13th [2] 178/20 281/24 14 [13] 46/3 65/3 69/22 70/14 85/22 147/5 147/14 162/11</p>	<p>168/23 179/6 179/10 180/23 196/19 14th [1] 281/25 15 [2] 46/22 65/23 15 years [5] 11/15 61/22 158/9 170/11 250/18 15-minute [1] 11/4 150 [1] 239/21 1516 [1] 79/3 1518 [2] 79/3 79/20 15:58 [1] 196/14 16 [16] 1/10 6/3 13/14 22/15 22/15 23/18 27/11 37/15 47/16 68/14 133/4 153/6 169/24 179/13 247/19 267/6 16 million [1] 130/10 16,000 [2] 252/23 257/5 166 [1] 152/4 16th [2] 28/23 37/22 17 [5] 27/11 49/15 123/15 153/7 176/1 17,000 [1] 260/11 170 [1] 165/20 170 kilometers [1] 174/7 1700 [1] 141/6 1702 [1] 96/7 177 [2] 162/18 195/21 17th [3] 23/20 26/22 28/25 18 [7] 13/14 22/15 51/2 72/17 80/21 171/16 180/19 18th [2] 25/7 228/5 19 [1] 52/23 19 percent [1] 278/4 1939 [1] 155/25 1956 [1] 213/14 1979 [2] 155/25 156/4 1984 [1] 156/11 1990 [10] 147/4 156/18 157/6 157/23 168/1 170/18 193/22 194/17 194/21 194/24 1990s [3] 137/12 193/21 196/7 1997 [2] 12/8 158/24 1998 [3] 159/11 250/8 251/23 1:00 [1] 139/2 1st [1] 146/6</p> <hr/> <p>2</p> <p>2 p.m [1] 139/1 2,400 percent [1] 247/21</p>	<p>2.1 [1] 103/6 20 [4] 53/13 113/23 121/12 246/20 20 kilos [4] 258/15 259/6 259/18 259/21 20 years [5] 124/22 132/1 134/5 136/10 265/14 20-year [1] 139/21 200 [3] 71/9 173/18 256/13 200 hectares [1] 253/11 200 kilometers [1] 173/22 200-meter [2] 261/10 262/2 2000 [2] 160/6 195/17 2000 and [2] 195/13 195/22 2000s [8] 162/19 180/2 182/2 182/10 192/5 195/12 211/14 242/12 2002 [1] 170/2 2003 [9] 13/6 147/5 158/11 158/17 161/10 168/23 173/15 195/13 195/22 2003-4 [1] 193/22 2004 [7] 161/10 165/10 168/23 169/7 194/18 209/11 241/5 2005 [1] 168/1 2006 [1] 43/10 2007 [1] 162/21 2010 [1] 56/14 2013 [7] 7/15 101/14 163/5 163/7 167/19 250/22 282/12 2014 [10] 163/10 163/13 251/7 251/23 257/4 257/13 262/5 266/6 273/17 276/8 2015 [6] 129/23 155/16 163/23 164/2 262/12 262/14 2016 [7] 155/17 262/5 262/16 262/21 263/19 271/22 272/23 2016-2017 [1] 282/19 2017 [23] 136/13 144/20 147/6 149/14 155/10 155/18 162/25 165/4 165/13 166/8 167/21 168/9 168/11 180/14 253/7 258/3 258/7 258/11 258/15 258/21 259/6 259/25 282/19 2017-2018 [1]</p>
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<p>2 2017-2018... [1] 154/21 2018 [97] 13/14 14/1 16/15 17/5 22/15 22/15 23/1 25/22 25/23 27/23 30/11 31/3 31/9 34/23 37/15 41/4 43/24 46/14 52/13 55/11 56/3 57/1 59/25 60/25 61/20 62/16 67/25 68/4 68/14 69/15 69/22 70/3 70/4 70/8 70/14 70/16 71/24 72/4 72/12 72/16 73/18 75/15 75/20 101/13 109/2 127/21 131/13 133/4 136/12 136/18 141/19 144/20 154/21 155/5 155/10 155/18 164/2 165/22 166/24 168/11 168/12 169/1 169/13 169/23 169/24 170/15 171/15 172/2 172/7 173/6 174/6 176/1 178/12 178/18 181/11 181/14 192/25 198/17 198/22 209/17 210/22 227/24 229/8 247/19 253/9 253/19 262/23 263/21 265/20 266/6 267/6 267/9 267/15 267/17 267/19 270/7 285/5 2019 [4] 155/20 166/5 168/7 253/12 2020 [3] 13/6 143/2 283/23 2021 [10] 32/20 143/16 183/16 183/22 184/3 184/5 184/19 186/3 186/11 260/16 2022 [5] 46/10 53/12 143/2 234/19 271/1 2024 [2] 1/14 5/1 21 [5] 55/7 125/3 206/18 216/4 236/25 21's [1] 215/22 21.2 [30] 104/17 105/1 108/4 197/24 198/8 206/18 207/1 208/1 208/7 209/7 210/5 210/15 212/13 212/23 213/4 215/16 217/12 217/15 217/16 218/6 218/22 222/19 222/24 223/4 223/21 223/22 225/2 226/2 226/20 236/1 22 [4] 59/9 59/11 170/18 173/19 231 [1] 146/18</p>	<p>24 [4] 8/18 59/9 85/12 129/16 24 hours [1] 8/18 25 [3] 71/25 112/22 169/23 25 percent [1] 129/17 25.5 [1] 129/12 25.5 percent [3] 129/17 129/20 248/23 250 million [1] 142/25 250,000 [1] 158/21 252 [1] 173/21 26 [2] 9/9 84/10 27 [2] 72/16 109/24 27.2 [1] 226/13 28 [2] 74/14 166/5 29 [2] 77/16 84/10 2:27 p.m [1] 139/4 2C5 [1] 91/25</p> <p>3 3 kilometers [3] 147/23 147/25 150/12 3-second [1] 259/20 30 [10] 55/14 55/21 81/17 227/24 232/17 238/22 267/14 267/19 268/20 269/1 30 hectares [1] 261/10 30-page [1] 232/15 300 [2] 148/17 174/25 30th [1] 74/22 31 [2] 72/4 89/12 31st [1] 72/6 325 [1] 99/5 33 [1] 95/2 34 [2] 43/25 101/1 35 [3] 71/19 108/2 114/8 368 [1] 86/19 369 [1] 86/19 37 [3] 71/19 117/9 125/5 382 [1] 87/12</p> <p>4 40 [3] 113/25 268/21 269/1 40 hectares [1] 252/22 40 years [3] 13/2 59/1 155/25 40,000 [1] 207/18 40-hectare [4] 257/6 261/15 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