

2021 International Criminal Court Moot Court Competition Problem

Case before the International Criminal Court (ICC): Prosecutor v. Dragone Goodrider of Wessos

Appeal from the Pre-Trial Chamber’s Decision on Confirmation of Charges

This is a fictional case intended to enable students to learn about the law and practice of the ICC. Participating teams will be divided into three roles: (1) Counsel for the Defendant, (2) Counsel for the Prosecution, and (3) Counsel for the State of Wessos participating in the proceedings under Article 19(2)(c) of the Rome Statute. In accordance with the rules of the Competition, each team shall write a Memorial for each of these roles, setting forth its legal arguments in the context of the interlocutory appeal by Defendant, Dragone Goodrider, challenging the jurisdiction of the ICC and erroneous rulings in the context of the Pre-Trial Chamber’s Decision on Confirmation of Charges.

Established Agenda for the Appeal of the Pre-Trial Chamber’s Decision

Pursuant to Pre-Trial Chamber VI’s decision to grant the “Defense Request for Leave to Appeal Issues in the Confirmation of Charges Decision” (dated 15 September 2020), the Appeals Chamber seeks submissions of all parties and participants on the following issues:

- a. Whether Defendant Dragone Goodrider was unlawfully deprived of his right to be present at the Confirmation Hearing under Article 61 of the Rome Statute and to represent himself under Article 67(1)(d) of the Rome Statute?
- b. Whether the charged offenses can be prosecuted as “other inhumane acts” under Article 7(1)(k) of the Statute and whether the prosecution met its duty to establish with sufficient evidence that there were substantial grounds to believe that Defendant Dragone Goodrider ordered the commission of such a crime under Article 25(3)(b) of the Statute?
- c. Whether the ICC has jurisdiction to prosecute Defendant Dragone Goodrider under Article 12 of the ICC Statute, considering that all of his actions related to the charges of other inhumane acts occurred in his State of nationality, Wessos, which is not a party to the ICC?

**[This is a fictional document for use in the ICC Moot Court Competition.
Any similarity to actual events or incidents is purely coincidental.]**

Pre-Trial Chamber VI
2021 ICC Moot Court Competition

Prosecutor v. Dragone Goodrider of Wessos

**Confirmation of Charges against
Defendant Dragone Goodrider of Wessos**

Pre-Trial Chamber VI of the International Criminal Court (ICC) renders this decision on the application filed by Counsel for the Defendant, Dragone Goodrider, challenging the jurisdiction of the ICC in the context of the confirmation of the charges of crimes against humanity.

Introduction

1. This case constitutes several “firsts” for this Court. It is the first case to address whether the ICC can hold a Confirmation Hearing without the physical presence of the accused and appoint defense counsel over the objection of the accused where the accused has asserted his right to represent himself and then proceeded to act in a persistently disruptive manner during pre-trial proceedings. It is also the first case to address whether actions of an accused that resulted in the spread of a deadly virus can be prosecuted as “other inhumane acts” as a crime against humanity under Article 7(1)(k) of the Statute. And it is the first case to address whether the ICC has jurisdiction over acts of a non-party national that occurred in the territory of a non-party state but had a deadly effect on nationals in a state party to the Rome Statute where the crime charged does not require a transborder element.

Factual Background

2. The Defendant: The Defendant, Brigadier General Dragone Goodrider (age 51), is a national of Wessos, where he has held the position of Minister of Defense for the past eleven years. As such, he has budgetary and command authority over all agencies and functions of the government relating to national security and the Wessos armed forces and police. A graduate of the Wessos Judge Advocate General School, General Goodrider is described in the international press as a tempestuous figure, who is the second most powerful official in Wessos, with substantial autonomy in his sphere of authority.

3. Primary States: This case focuses on two States (Eassos and Wessos) that are located adjacent to one another on an island roughly the size of Haiti/Dominican Republic, located in the Sea of Astapor. The State of Eassos (population 7 million) is a party to the Rome Treaty, which it ratified on 5 August 2018. The State of Wessos (population 5 million) has neither signed nor ratified the Rome Treaty and views the Court as an affront to its sovereignty. Wessos and Eassos

are members of the U.N. and the World Health Organization. They do not have a bilateral extradition treaty and are not party to any other treaty relevant to the subject matter of this case. Eassos has a democratic form of government, while Wessos is ruled by an authoritarian regime, which attained power in a coup in 2009. Since then, Wessos has been a secretive country with little involvement in the international community, and has had a strained relationship with the government of Eassos. The exact boundary between them is in dispute and the porous border area known as the Bloody Mountain range has been the site of frequent smuggling of contraband from Eassos to Wessos, refugee migration from Wessos to Eassos, and sporadic armed incursions in both directions. The two States do not have diplomatic relations and each side is extremely suspicious of the territorial and military ambitions of the other. **See Map at Appendix A.**

4. **The Evidence:** The essential facts of this case are based on the Report by the World Health Organization on the Viral Outbreak in Eassos, dated 21 April 2020, and two Annexes appended to the WHO Report -- Annex 1, containing a series of confidential emails between the Defendant and Dr. Lance Rayder (MD, PHD), the Director of the Wessos Institute of Viral Diseases; and Annex 2, containing the minutes from a meeting of the Wessos National Security Council on 2 March 2020. **See WHO Report at Appendix B.** Appointed Defense Counsel does not contest the authenticity of these emails or meeting minutes, only their legal significance.

5. As documented in the emails appended to the WHO Report, Wessos had been hit hard by the outbreak of the H5N8 Avian Influenza in the summer of 2019. Only poultry and wild birds had been infected, but General Goodrider was concerned that the virus would mutate and jump to humans. This prompted General Goodrider in October 2019 to order Dr. Lance Rayder, the Director of the Wessos Institute for Viral Diseases, to immediately launch a program to develop a vaccine that would protect the Wessos human population against this disease should it return. He understood that as a first step this would require developing a mutation of the H5N8 that can infect humans.

6. In response, Dr. Rayder told General Goodrider that he would transform an existing microbiological testing laboratory at the Institute for Viral Diseases to be used as the site for the development of a strain of the H5N8 Avian Influenza that can infect humans through airborne transmission and a vaccine against the virus. But Rayder pointed out that the Institute had never before worked with such a dangerous virus, and therefore requested that General Goodrider provide him increased funding from the Ministry of Defense to upgrade the existing lab facility, including by adding airtight seals, improved air filtration, a shower in the anteroom, and an incinerator for contaminated clothing. He specifically warned Goodrider that “without these upgrades there was a very high risk that a deadly virus could escape the lab into the general population of Wessos.”

7. Goodrider answered that Dr. Rayder’s team should commence work without delay and that no additional funding was available for the project. He said he believed that Rayder was exaggerating the risk and told Rayder that if he won’t get the job done under these conditions, he’ll be replaced by someone else who will.

8. At first, things seemed to be going smoothly. In February 2020, Dr. Rayder reported to General Goodrider that his team had conducted a series of successful trials with a modified strain of the H5N8 avian influenza on ferrets: “Given the close resemblance of ferrets to humans in many aspects of influenza biology and pathology, we believe we now have a strain of H5N8 capable of human-to-human airborne transmission. Now, we can start testing a vaccine to protect the human population from this deadly virus.”

9. Then, things went wrong. In an email dated 27 February 2020, Dr Rayder reported to General Goodrider that two of the Lab scientists had failed to report to work that morning because of flu-like respiratory symptoms they were experiencing. Dr. Rayder said that the scientists were self-quarantining at home, but that they had traveled to their home in the Bloody Mountain Range near the Eassos border from the Lab on a crowded bus, potentially exposing dozens of individuals along the way. “This is just what I warned you about,” Dr. Rayder wrote.

10. In a reply email dated a few hours later, General Goodrider told Dr. Rayder not to panic. Instead, Goodrider instructed Rayder to continue the work with other scientists until the sick personnel recovered and returned to the Lab. But things only got worse. On 1 March 2020, Dr. Rayder emailed General Goodrider to inform him that the two scientists had died, that their families were now experiencing similar symptoms, and that more scientists at the Lab were also showing symptoms of serious respiratory illness.

11. That was the last email Dr. Rayder sent General Goodrider. Shortly after sending the email, Dr. Rayder left the Institute with copies of his email correspondence and traveled with them across the border into Eassos. He made his way to the Eassos Capital Hightown, where he sought and was provided asylum. On 11 April 2020 Rayder provided the government of Eassos copies of the correspondence with Goodrider regarding the development and escape of the deadly virus, which the Eassos Ministry of Health immediately forwarded to the World Health Organization. The entire chain of email correspondence was included in the WHO’s Report on the Viral Outbreak in Eassos, dated 21 April 2020.

12. Meanwhile, on 2 March 2020, General Goodrider convened an emergency meeting of the Wessos National Security Council, which he heads. The Council is made up of the Ministers of Transportation, Health, Public Safety, and Defense, all of whom are under the command of General Goodrider. The minutes of this meeting were leaked on 16 April 2020 to the international press by the Secretary of the National Security Council, who the Prosecutor reports has subsequently gone missing. According to those minutes, General Goodrider ordered that all necessary steps be taken to keep the spread of the newly created virus secret to avoid panic. He ordered clean-up crews to dispose of the bodies of the infected scientists and their families. He further ordered the Wessos police to round up all individuals showing signs of having contracted the virus and transport them to military quarantine centers. Finally, he ordered that the weekly flight from the Wessos international airport be suspended until further notice.

13. According to the 21 April 2020 WHO Report, while General Goodrider’s actions effectively contained the outbreak on the Wessos side of the border, the deadly new virus had already spread to neighboring Eassos. “Rather than warn Eassos and the WHO, General Goodrider’s secrecy

order was tantamount to a death sentence -- by mid-April, 250,000 residents of Eassos had died of the new strain of avian influenza, and many more suffered severe illness.”

Proceedings before the ICC

14. After the WHO Report was published, Eassos indicted Dragone Goodrider under its domestic homicide statute for ordering the creation of a deadly disease under conditions likely to result in its release and for ordering the fact of its release be kept secret, resulting in the deaths of over 250,000 men, women, and children in Eassos. With no prospect of obtaining custody over General Goodrider from Wessos, the Government of Eassos referred the matter to the ICC for prosecution on 1 June 2020 under Article 14 of the ICC Statute.

15. Based on the WHO Report and its attachments, the ICC Prosecutor determined that there was a reasonable basis to proceed with an investigation into whether Dragone Goodrider was responsible for “other inhumane acts” in Eassos under Articles 25(3)(b) and 7(1)(k) of the Rome Statute. Pursuant to **Article 58(7)** of the Court’s Statute, on 15 July 2020 the Pre-Trial Chamber granted the Prosecutor’s request for the issuance of a summons, requesting Dragone Goodrider to appear before the Court.

16. Two weeks later, on 1 August 2020, Dragone Goodrider voluntarily appeared before the Pre-Trial Chamber of the ICC with the objective of contesting the Court’s jurisdiction over this case. Pursuant to Rule 21(4), noting that he was an experienced lawyer, Goodrider notified the ICC in writing of his intention to represent himself in all proceedings before the ICC.

17. At the conclusion of the proceedings on 1 August, the Pre-Trial Chamber rejected Dragone Goodrider’s request for interim release pending trial under Article 60 and Rule 121. The Defendant became enraged. He used the most offensive curse words and foul language imaginable to describe what he thought of the Pre-Trial Chamber’s ruling and judges and threatened to use his right of self-representation to turn every stage of the proceedings into a circus “like Saddam Hussein did at his infamous trial.” The Pre-Trial Chamber responded to Defendant’s “persistent and disruptive outbursts and use of foul language” by informing Goodrider that it would be appointing him “stand by” Defense Counsel to provide assistance and step in if necessary pursuant to Article 67(1)(d) of the ICC Statute, Rule 22 of its Rules of Procedure and Evidence, **and Regulation 76 of the Regulations of the Court**. Goodrider replied that he rejected the Court’s authority to assign Defense Counsel when he wished to represent himself and said he would not cooperate in any way with such Counsel.

The objections of the Defense Counsel

18. In a written submission dated 15 August 2020, the court-appointed Defense Counsel raised several objections to the jurisdiction of the ICC and other matters on behalf of Dragone Goodrider despite not having communicated with him:

First, Defense Counsel argued that the Pre-Trial Chamber could not appoint defense counsel for a defendant who elects to represent himself, and that the Court must allow Dragone Goodrider to appear as his own lawyer at every stage of the proceeding.

Second, Defense Counsel argued that the allegations do not make out a cognizable “other inhumane act” crime against humanity under Article 7(1)(k) of the ICC Statute. Instead, he argued that the Prosecutor must charge the crime against humanity of murder under Article 7(1)(a), and said to apply an “other inhumane act” of spreading a virus would violate the *nullem crimen sine lege* principle set forth in Article 22 of the ICC Statute. Further, Defense Counsel argued that the alleged facts contained in the WHO Report and its attachments are not sufficient for a prosecution of ordering commission of a crime against humanity of any type under Article 25(3)(b) of the Statute.

Third, Defense Counsel argued that the ICC does not have jurisdiction over this case, as the preconditions established under Article 12 of this Court’s Statute were not met. Dragone Goodrider is a national of Wessos, he resides in Wessos, and all of his actions occurred in Wessos -- a state that is not a party to the ICC. According to the Defense, the so-called “effects jurisdiction” is not part of the Court’s jurisdiction except in a case where the trans-border effect is an element of the crime, such as with deportation in the Bangladesh/Myanmar (Rohingya) case.

The Pre-Trial Chamber agreed to consider these objections at a hearing on Confirmation of Charges under Article 61 of the Court’s Statute.

Findings and Conclusions

19. On 1 September 2020, the Pre-Trial Chamber held an oral argument on the Confirmation of Charges as well as the objections raised by the Defendant. After the Prosecution laid out its case, Defendant Dragone Goodrider was permitted to address the Court following a warning by the Pre-Trial Chamber that disruptive behavior would not be tolerated. Ignoring the warning, Goodrider resorted to curse words and used racial slurs and anatomical slang to refer to the Prosecutor and Judges. Invoking **Article 61(2)** of the Court’s Statute, the Prosecutor asked for the removal of the defendant due to his inappropriate behavior. To ensure the decorum, efficiency, and fairness of the proceedings, the Pre-Trial Chamber declared a recess, instructed appointed Defense Counsel to take over for the Defendant, and arranged for Dragone Goodrider to participate in the remainder of the Confirmation proceedings from a remote location in the ICC premises via a video link with the ability to communicate with appointed Defense Counsel **but was not permitted to make statements directly to the Court.**

20. After duly considering the written submissions and oral arguments of the Prosecutor, appointed Defense Counsel, and Counsel for the State of Wessos, the Pre-Trial Chamber hereby makes the following findings and conclusions:

First, pursuant to Article 67(1)(d), the Pre-Trial Chamber finds that it was consistent with the interest of justice for it to appoint “stand by” Defense Counsel over the objection of

the contumacious Defendant, and pursuant to Article 63(2) and Rule 170 to require him to participate remotely in order to preserve the decorum, efficiency, and fairness of the proceedings.

Second, the Pre-Trial Chamber determines that the WHO Report and the appended emails and meeting minutes, together with the evidence of serious injury to thousands of victims in Eassos, constitute sufficient evidence to provide substantial grounds to believe that the **Defendant ordered the commission of ‘other inhumane acts’ as a crime against humanity** under Articles 25(3)(b) and 7(1)(k) of the Rome Statute.

Third, the Pre-Trial Chamber determines that the Court does have jurisdiction in this case under Article 12 of the ICC Statute where the Defendant’s orders caused the deaths of hundreds of thousands of citizens in the State of Eassos, which is a Party to the ICC Statute. Specifically, the Chamber holds that the Court may exercise “effects jurisdiction” including against nationals of non-party states even where transborder acts are not an element of the crime.

For these reasons, the Pre-Trial Chamber hereby:

Determines that the Defendant may be prosecuted for commission of crimes against humanity, namely other inhumane acts, pursuant to Articles 7(1)(k) and 25(3)(b) of the Statute.

Determines that the preconditions set forth in Article 12 of the Statute are met in this case.

Confirms that the Prosecutor has supported the charges of other inhuman acts as a crime against humanity with sufficient evidence to establish substantial grounds to believe that Dragone Goodrider is criminally liable for the charges against him.

Orders the Registrar to notify the parties and participants of this decision.

Dissent by Judge Vexatious:

I found the arguments of the Defense on issues 1, 2 and 3 (see para. 18 above) persuasive and I therefore dissent from the Decision of the Pre-Trial Chamber and urge the Chamber to certify the case for interlocutory appeal.

[Signed] Judge Friendly, Judge Learned, and Judge Vexatious (Dissenting)

**Dated 15 September 2020
At The Hague, The Netherlands**

Appendix A

Map



Appendix B



[Fictional] Report of the World Health Organization On the viral outbreak in the State of Eassos 21 April 2020

1. In the summer of 2019, an outbreak of H5N8 Highly Pathogenic Avian Influenza spread through the adjacent states of Eassos and Wessos. By September when the viral outbreak subsided, 50 percent of the two countries' poultry had perished, as well as millions of wildbirds. No humans or livestock were infected by the avian influenza at that time.
2. On 21 March 2020, the Office of the Director General of the World Health Organization was alerted by the Eassos Ministry of Health to a deadly new strain of influenza that was spreading quickly through the human and animal population of the State of Eassos. The first cases were discovered in early March among the towns in the Bloody Mountain Range that straddles the Eassos/Wessos border. From there, the disease quickly spread to the Eassos coastal cities and the capital city of Hightown (population 1 million).
3. On advice from the WHO, on 23 March 2020 the government of Eassos ordered culling/burning of any animals showing symptoms of respiratory illness, required all residents to shelter in place, closed major border crossings and all means of transportation into and out of the country, and required all residents to wear masks when outside their homes. Although these efforts ultimately brought the spread of the disease under control, by mid April 250,000 residents of Eassos had died of the new virus, which Eassos scientists identified as a mutated version of the H5N8 Avian Influenza. Eassos hospital records indicate that this new strain of avian influenza is highly infectious to humans (with an R of over 5) and deadly (with a 34.5 percent mortality rate).
4. On 12 April 2020 the Office of the Director General of the WHO received an email from the Eassos Ministry of Health containing copies of email correspondence between Dr.

Lance Rayder (MD, PHD), Director of the Wessos Institute of Viral Diseases and General Dragone Goodrider, Minister of Defense of Wessos, indicating that the deadly strain of avian influenza had been developed by Dr. Rayder's lab under the orders of General Goodrider, and that the virus had escaped into the population of Wessos near the Eassos border on 27 February 2020. The emails documented that General Goodrider not only ordered the development of the deadly virus, but knowingly prevented the Institute from taking the proper precautions in handling the disease. According to the Eassos Ministry of Health, Dr. Rayder turned the emails over to the Eassos Government on 11 April 2020 in return for asylum. Those emails are attached as Annex 1 to this Report.

5. A few days later, on 16 April 2020 the international press published the minutes of a 2 March 2020 confidential meeting of the Wessos National Security Council, chaired by General Goodrider. According to news accounts, the minutes of the secret meeting were leaked to the press by the Secretary of the Council who blamed the General for his gross malfeasance related to the creation and spread of the new deadly avian influenza. The minutes document that, after learning of the release of the experimental virus from the Wessos Institute of Viral Diseases, General Goodrider sent clean-up crews to dispose of the bodies of the scientists and their families who had died from the virus and ordered the military to secretly round up all Wessos citizens who showed signs of infection and place them in quarantine at military detention centers. He also ordered the members of the Council to take the necessary steps to keep the spread of the virus secret to avoid panic and specifically forbade them from alerting the WHO.
6. General Goodrider's actions apparently contained the outbreak on the Wessos side of the border, but the virus that the Wessos lab had created under his orders had already spread to neighboring Eassos. Rather than warn Eassos and the WHO, General Goodrider's secrecy order was tantamount to a death sentence -- by mid-April, 250,000 residents of Eassos had needlessly died of the new strain of avian influenza, and many more suffered severe illness.

Annex 1: Email Correspondence between Dragone Goodrider and Lance Rayder

FR: D. Goodrider
TO: L. Rayder
DATE: 2 October 2019 (1400 hrs)
RE: Confidential: New Project

Director Rayder. Thank you for your sage recommendations when our country was hit by the outbreak of the H5N8 Avian Influenza last summer. I'm told that we were very lucky that it did not jump to humans. I understand that scientists in other countries are experimenting with mutations of the H5N8 that can infect humans so they can develop new treatments and vaccines before the virus naturally mutates. In response to this serious threat, I would like you to launch such a program to develop a vaccine that will protect the Wessos population against this deadly disease. Consider this a top priority. Confirm next steps immediately.

FR: L. Rayder
TO: D. Goodrider
DATE: 3 October 2019 (0900 hrs)
RE: Confidential New Project

General. That is a wise precaution. I will transform the microbiological testing laboratory at the Institute for Viral Diseases to be used as the site for the development of a vaccine against the H5N8 Avian Influenza virus. As a first step, we are going to have to alter the functional characteristics of the H5N8 virus to allow it to become more transmissible to humans. We have the knowledge and capability to do this, but the Institute has previously worked only with Risk Group 2 agents as classified by the WHO. The new project will involve agents in the Risk Group 4 classification, which are much more infectious and deadly. I therefore request that the Ministry of Defense provide the Institute increased funding to enable us to upgrade the existing lab facility by adding airtight seals, improved air filtration, a shower in the anteroom, and an incinerator for contaminated clothing. I want to stress that without these upgrades there is a high degree of risk that a deadly virus could escape the lab into the general population of Wessos.

FR: D. Goodrider
TO: L. Rayder
DATE: 4 October 2019 (1000 hrs)
RE: Confidential: New Project

Director, your team must commence work on the Avian Flu vaccine project without delay. I provided you funding last summer for specialized protective gear and respirators for your staff. No additional funding is available for this project. Make do. Besides, surely you are exaggerating the risk. If you won't get the job done under these conditions, I'll have you replaced by someone else who will. I don't want to hear another word about more funding. Just get to work!

FR: L. Rayder
TO: D. Goodrider
DATE: 11 February 2020 (1500 hrs)
RE: Confidential: New Project

General, at last some good news. My team has conducted a series of successful trials with a modified strain of the H5N8 Avian Influenza on ferrets. Through serial passage in ferrets we have obtained a virus capable of small-droplet transmission from one infected ferret to another. Given the close resemblance of ferrets to humans in many aspects of influenza biology and pathology, we believe we now have a strain of H5N8 capable of human-to-human airborne transmission. Now, we can start testing a vaccine to protect the human population from this deadly virus.

FR: L. Rayder
TO: D. Goodrider
DATE: 27 February 2020 (0930 hours)
RE: Confidential: New Project

General, there may have been a serious safety breach at the H5N8 Virus Lab. Two of my team members failed to report to work this morning because of serious flu-like respiratory symptoms they were experiencing. They are self-quarantining at home, but I'm worried that they traveled to their homes near the border with Eassos from the Lab on a crowded bus last night, potentially exposing dozens of individuals along the way. This is just what I warned you about back in October!

FR: D. Goodrider
TO: L. Rayder
DATE: 27 February 2020 (1100 hrs)
RE: Confidential: New Project

Director, do not panic. It's probably just the ordinary flu. My wife had a touch last week and is feeling better. Continue the work with other scientists until the sick personnel recover and return to the Lab. In the meantime, don't tell anyone else about this.

FR: L. Rayder
TO: D. Goodrider
DATE: 1 March 2020 (8300 hrs)
RE: Confidential: New Project

General, I just learned that the two infected scientists have died of respiratory failure. And their families are now experiencing similar symptoms of the avian influenza -- severe fever, persistent coughing, and extreme difficulty breathing. Several more scientists at the Lab are also showing these symptoms. Based on our experiments with ferrets, I fear that this new strain of H5N8 could spread very quickly and kill hundreds of thousands of our people. I urge you to act immediately to avert disaster.

Annex 2: Minutes of the Wessos National Security Council

2 March 2020 meeting. Confidential

Minutes Prepared by S. Terry

The Meeting was convened at 9:03 AM.

In attendance: General Dragone Goodrider (Minister of Defense), Egrette Snow (Minister of Transportation), Dr. Nimera Bannister (Minister of Health), Jorah Mermount (Minister of Public Safety), Eddard Lark (Executive Aide to the Minister of Defense), and Samwel Terry (Secretary to the National Security Council).

Goodrider: It seems that a particularly nasty strain of avian flu that Director Lance Rayder was working on at the Institute of Viral Diseases has broken loose. The symptoms are severe fever, persistent coughing, and extreme difficulty breathing. So far, several scientists and their families have died. We've sent clean-up crews to their homes and burned the bodies. Further recommendations?

Bannister: We should notify the World Health Organization immediately.

Goodrider: Absolutely not! Listen up. Everyone in this room is ordered to take the necessary steps to keep the spread of this virus secret to avoid panic. If anyone asks, just say it's the ordinary flu.

Bannister: But shouldn't we at least warn the health authorities in Eassos? The Institute for Viral Diseases Lab is near the Eassos Border. If we don't let them know about the escape of this virus, their population could be decimated in a matter of weeks.

Goodrider: I don't give a damn about Eassos. My order stands. Tell no one! Let's focus on what we can do for Wessos.

Mermount: General, my police forces could quietly round up all individuals who show any symptoms of this virus.

Goodrider: That's a good idea. I'll order the army to set up secret quarantine centers at our military bases to hold them until they recover or die.

Snow: General, I'd recommend that we suspend the once-per-week international flight from the airport to ensure this doesn't get past our borders.

Goodrider: Do it. Any other recommendations? [No hands were raised]. OK. Remember, this is absolutely secret -- need to know only.