

**BEFORE THE TRIAL CHAMBER
EXTRAORDINARY CHAMBERS IN THE COURTS OF CAMBODIA**

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**NUON CHEA'S RESPONSE TO CIVIL PARTY LEAD CO-LAWYERS' REQUEST
FOR CLARIFICATION RELATING TO THE REMAINING CHARGES IN CASE 002**

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I. INTRODUCTION

1. Pursuant to Article 8.3 of the Practice Direction on Filing of Documents before the ECCC, the Co-Lawyers for Mr. Nuon Chea (the “Defence”) submit the instant response to the Civil Party Lead Co-Lawyers’ Request for Clarification Relating to the Remaining Charges in Case 002.

II. BACKGROUND

2. On 9 September 2016, the Civil Party Lead Co-Lawyers (the “LCLs”) filed a request before the Trial Chamber for clarification regarding the remaining charges in Case 002 (the “Request”).¹ The Request was notified to the parties on the same day.
3. The Request seeks clarification from the Trial Chamber regarding the status of the remaining charges in Case 002, *i.e.*, “charges outside the scope of Case 002/01 and Case 002/02”.² The Request identifies as the “remaining charges” the following:

namely, those related to Sang Security Center, Koh Kyang Security Center, Prey Damrei Srot Security Center, Execution Sites in District 12, Wat Kirirum Security Center, North Zone Security Center, Kok Kduoch Security Center, Wat Tlork Security Center, Steung Tauch Execution Site, Prey Sar Worksite, Srae Ambel Worksite, the Treatment of Buddhists (nationwide), Movement of the Population Phase 3, and crimes committed by the Revolutionary Army of Kampuchea on Vietnamese territory.³

III. RESPONSE

A. The Omission of Kroch Chhmar Security Centre from the Request

4. The Defence cannot help but notice that, in listing the remaining charges, the LCLs omit to mention Kroch Chhmar Security Centre in relation to the charges pertaining to the treatment of the Cham people. As with the “crimes committed by the Revolutionary Army of Kampuchea on Vietnamese territory”⁴ and the “Treatment of Buddhists (nationwide)”⁵ – both listed as remaining charges in the Request – Kroch Chhmar Security Centre is a major crime site in relation to the “Treatment of Targeted Groups”

¹ E439, ‘Civil Party Lead Co-Lawyers’ Request for Clarification Relating to Remaining Charges in Case 002’, 9 Sep 2016 (the “Request”).

² E439, Request, para. 6; *see also*, para. 7.

³ E439, Request, para. 1; *see also*, para. 7.

⁴ E439, Request, para. 1; E301/9/1.1, ‘Annex: List of Paragraphs and Portions of the Closing Order Relevant to Case 002/02’, 4 Apr 2014 (“Scope of Case 002/02”), ERNs 00981687-88, at 2(iv)(b) and 3(xii).

⁵ E439, Request, para. 1; E301/9/1.1, Scope of Case 002/02, ERN 00981688, at 2(iv)(c) and 3(x).

charged in Case 002⁶ but explicitly excluded from the scope of Case 002/02 by the Trial Chamber in its severance decision in 2014.⁷

5. Given the structure and the clarity of the Trial Chamber's severance decision⁸ as well as the Defence's submissions on issues related to the exclusion of Kroch Chhmar Security Centre from the scope of Case 002/02 (see below), the Defence does not believe that the omission of Kroch Chhmar Security Centre from the Request was an innocent and inadvertent mistake. This omission is, in the opinion of the Defence, yet another example of constant attempts by some parties before the ECCC to avoid discussions about any involvement of senior officials of the current Cambodian government in alleged crimes during the regime of Democratic Kampuchea ("DK").⁹

B. Kroch Chhmar Security Centre and the Possible Involvement of Senior Officials of the Current Government in the Suppression of the Cham People

6. According to the Closing Order, Kroch Chhmar Security Centre was located in Kroch Chhmar District, Kampong Cham Province, which was within Sector 21 of the East Zone during the DK regime.¹⁰ The Closing Order charges that:

Most of the prisoners held at Kroch Chhmar Security Centre were Cham people from the villages of Kroch Chhmar District including Cham women and children. The arrest and detention of the Cham escalated after the Cham rebellions in 1975. The people who were arrested were considered to be affiliated with the rebellions.¹¹

7. Ample evidence suggests that the military and the civilian authorities of Sector 21 were responsible for the heavy crackdown on the two Cham rebellions taking place in September and October 1975 in the villages of Koh Phal and Svay Khleang in Kroch Chhmar District, which allegedly lead to the death, arrest and mistreatment of many

⁶ D427, 'Closing Order', 15 Sep 2010 ("Closing Order"), paras. 771-775

⁷ E301/9/1.1, Scope of Case 002/02, ERNs 00981687-88, at 2(iv)(a) and 3(xi).

⁸ E301/9/1.1, Scope of Case 002/02, ERNs 00981687-88, at 2(iv)(a)-(c) and 3(x)-(xii). In the severance decision, the note in brackets excluding Kroch Chhmar Security Centre from the scope of Case 002/02 is literally parallel – in the neighbouring line – to the notes regarding the crimes against the Vietnamese in the Vietnamese territory and the treatment of Buddhists in all parts of the country other than Tram Kok Cooperatives.

⁹ For previous submissions by the Defence on this matter, see, e.g., E370, 'Nuon Chea's Urgent and Consolidated Request to Expedite Two Already-Requested Witnesses and Summons Four Additional Witnesses Regarding the Treatment of the Cham', 29 Sep 2015 ("NC Witness Request for Cham Segment"), paras. 8-9; E347/2, 'Nuon Chea's Request to Reconsider Admitting One Extract and to Admit Two Additional Extracts from the Human Rights Watch Report "30 Years of Hun Sen"', 11 Dec 2015 ("NC Request to Admit HRW Report"), paras. 10-11; T. 8 Sep 2015 (It Sen, E1/343.1), p. 24, ln. 20-p. 25, ln. 3.

¹⁰ D427, Closing Order, para. 771.

¹¹ D427, Closing Order, para. 773.

Cham people.¹² In particular, Battalion 55 of the Sector 21 military forces suppressed the Cham rebellions in Koh Phal and Svay Khleang following orders from the Sector 21 Military Staff.¹³

8. According to Sau Seimech, a messenger in Battalion 55, the commander of Battalion 55 “organized the troops to suppress the Cham rebellion”.¹⁴ Sau Seimech also stated that Battalion 55 commander received orders from Yun Sophi¹⁵ – chairman of the battalion staff and member of the Sector 21 Military Staff – who in turn received orders from the Sector 21 regiment staff, the chairman of which was Prime Minister Hun Sen.¹⁶
9. The Human Rights Watch Report, *30 Years of Hun Sen*, summarises corroborated evidence that suggests that troops under Hun Sen’s command were involved in suppressing the Cham rebellions in Kroch Chhmar District in 1975:

After April 17, 1975, but while still in the hospital, Hun Sen was appointed as chief of staff of an autonomous special regiment in the East Zone, one of three such units in various parts of the zone. As per CPK practice, in this structure the CPK sector secretary exercised authority over the sector military. Created out of the wartime Sector 21 regiment, it comprised Battalions 55, 59, and 75. Hun Sen was concurrently a deputy commander of the regiment, so he held positions giving him authority over all of the regiment’s 2,000 men. By May 1975, Hun Sen was well enough to attend meetings, and shortly thereafter he joined his regiment, which had been deployed to the border with Vietnam in Me Mut district of Sector 21.

In the ensuing months, Cambodia’s Islamic Cham minority communities began to oppose the new order. Unrest grew in Krauch Chhmar district of Sector 21, especially on the island of Koh Phal (directly south across the Mekong from Peam Koh Sna commune) and further downriver in the Krauch Chhmar commune of Svay Khleang along the south bank of the Mekong. CPK suppression of uprisings in September-October 1975 in the villages of Koh Phal and Svay Khleang ended the most serious of such unrest. As early as 1996, a history of the CPK reported that Sector 21 forces were

¹² See, e.g., T. 23 Mar 2016 (Ysa Osman, **E1/407.1**), p. 50, ln. 15-p. 51, ln. 7: expert witness Ysa Osman, author of the book *The Cham Rebellion* (**E3/2653**), testified in court that, based on his interviews with numerous witnesses, it was the forces sent from Sector 21 that brought heavy weapons such as cannons and other artilleries to suppress the 1975 Cham rebellions with the support of the forces from the Kroch Chhmar District. Mr. Osman further testified that, based on the material available to him, “the leadership” of Sector 21 or that of the East Zone at that time was responsible for the crackdown of the 1975 Cham rebellions; see, T. 23 Mar 2016 (Ysa Osman, **E1/407.1**), p. 69, lns. 18-24.

¹³ **E3/5261**, ‘Written Record of Interview of Sau Seimech’, 12 Dec 2008 (“Sau Seimech WRI”), ERN 00274336. See also, **E347.3**, Human Rights Watch, *30 Years of Hun Sen: Violence, Repression, and Corruption in Cambodia*, Jan 2015 (“HRW Report”), p. 20, publicly available at <https://www.hrw.org/report/2015/01/12/30-years-hun-sen/violence-repression-and-corruption-cambodia>.

¹⁴ **E3/5261**, Sau Seimech WRI, ERN 00274336.

¹⁵ The Closing Order charges that “Yin Sophy” was in charge of the security in Sector 21 and visited Kroch Chhmar Security Centre regularly; see, **D427**, Closing Order, para. 772. One witness interviewed by Ysa Osman stated that, while being transported by boat with other detainees from Kroch Chhmar Security Centre shortly after the 1975 Cham rebellion in Svay Khleang Village, he saw Sector 21 security chief “Yin Sophy” showing up and eating with the guards that escorted the detainees. See, **E3/2653**, Ysa Osman, *The Cham Rebellion: Survivors’ Stories from the Villages*, p. 110, ERN 00219171.

¹⁶ **E3/5261**, Sau Seimech WRI, ERNs 00274336 and 00274338.

involved in the suppression of the unrest. However, Hun Sen has repeatedly denied any forces of his regiment were involved. He says that once in Me Mut, he began resisting CPK orders, the first instance being his refusal in September 1975 to send troops to kill Cham civilians. He says he told his superiors that 60 to 70 percent of his troops were ill with malaria and therefore not fit to put down the Cham revolt. The unrest, he says, was instead suppressed by forces from Krauch Chhmar district itself.

Other accounts contradict Hun Sen's version, indicating that although Krauch Chhmar district forces may have dealt on their own with Koh Phal village, Battalion 55 of the Sector 21 Regiment was directly involved in the subsequent attack on Svay Khleang. According to one testimony by a former Sector 21 regiment combatant, after the unrest broke out and had already spread to Svay Khleang, Battalion 55 was dispatched from the border to suppress it. This is corroborated by the account of a Krauch Chhmar resident who observed Sector 21 troops moving into battle, saying that the units that suppressed the Cham unrest in 1975 were Krauch Chhmar District Military forces, based at the district seat on the Mekong, and Battalion 55, which came up into Krauch Chhmar from rubber plantations to the south, thus arriving from further away and therefore later than Krauch Chhmar forces. This is consistent with a Svay Khleang villager's account that after Krauch Chhmar district troops appeared from the west, hundreds of other troops in a different type of uniform and carrying heavy weapons arrived. A fourth source, who also lived in the Svay Khleang village during the attack declared that there were four attack prongs, including Krauch Chhmar district forces who dug in as a blocking force west of Svay Khleang and forces belonging to the Sector 2 regiment from the border, which carried out assaults from the east, the south, and from on boats in the Mekong. This source specified that the attackers bombarded the village with 60 and 82 millimeter mortar rounds, while also firing on villagers with assault rifles and rocket-propelled grenades, killing hundreds of villagers. He also said the Sector troops came up through rubber plantations in, or to the south of, Krauch Chhmar.¹⁷ (emphasis added)

10. In addition to Hun Sen, some other senior officials in the current government of Cambodia also served in the leadership of Sector 21 in 1975. For instance, Senator Ouk Bunchhoeun was the deputy secretary of Sector 21 from July 1975 to 25 May 1978.¹⁸
11. As demonstrated above, plenty of evidence suggests that senior officials of the current government of Cambodia may have been involved in the crimes against the Cham people allegedly committed in relation to the crackdown on the 1975 Cham rebellions in Kroch Chhmar District. Kroch Chhmar Security Centre is the only crime site charged in Case 002 that relates to these crimes.

C. The Pattern of Avoiding Discussions about Any Involvement of Current Senior Government Officials in Alleged Crimes Committed in DK

12. Since the beginning of Case 002, there has been a clear pattern of attempts by some parties before the court to avoid discussions about any involvement of the current senior Cambodian government officials in alleged crimes committed during the DK regime.

¹⁷ E347.3, HRW Report, pp. 19-20, ERNs 01086026-27.

¹⁸ E3/387, 'Transcript of Recorded Interview with Ouk Bunchhoeun 04-08-1990', ERN 00350203.

The Defence has made submissions on this matter on various occasions, in particular in the appeal against the trial judgement of Case 002/01.¹⁹ For the limited purpose of the current response, the Defence will only expand on the development of such events insofar as they relate to Kroch Chhmar Security Centre.

(i) *The Exclusion of Kroch Chhmar Security Centre from the Scope of Case 002/02*

13. With regard to the exclusion of Kroch Chhmar Security Centre from the scope of Case 002/02, the Defence has previously expressed its concerns that the exclusion was for the purpose of avoiding discussions of evidence that may incriminate current senior government officials.²⁰
14. As briefly discussed previously, the Trial Chamber excluded Kroch Chhmar Security Centre from the scope of Case 002/02 following the suggestion of the Co-Prosecutors. The Co-Prosecutors' reason for the exclusion, however, is vague, self-contradictory and not convincing. The Co-Prosecutors submit that:

the allegations in the Closing Order relating to “Crimes Committed by the Revolutionary Army of Kampuchea on Vietnamese territory” (paras. 832-840) [should] be severed and excluded from Case 002/02, as such allegations concern separate or discrete events that are not intrinsically related to the Genocide of the Vietnamese who lived in Democratic Kampuchea. For similar reasons, the Co-Prosecutors propose that the allegations relating to the Kroch Chhmar Security Centre (paras. 771-775) be severed and excluded from the scope of Case 002/02.²¹ (emphasis added)

15. First, contrary to the Co-Prosecutor's assertion, there is nothing “similar” between Kroch Chhmar Security Centre and the alleged crime sites in the Vietnamese territory. In contrast to the latter, Kroch Chhmar Security Centre was located deep inside the territory of DK. The allegations in relation to Kroch Chhmar Security Centre are as intrinsically related to the charged crimes against the Cham people living in DK as Trea Village Security Centre²² – another security centre also located in Kroch Chhmar District – which was interestingly not proposed by the Co-Prosecutors to be excluded.
16. Second, Kroch Chhmar Security Centre is particularly relevant to the *mens rea* of the alleged crimes against the Cham people charged in Case 002, in particular, persecution and genocide. As acknowledged by the Closing Order, evidence related to Kroch

¹⁹ See, **F16**, ‘Nuon Chea’s Appeal against the Judgement in Case 002/01’, 29 Dec 2014 (“NC Appeal”), Sections III, IV, VI and VIII, in particular, para. 29.

²⁰ **E370**, NC Witness Request for Cham Segment, paras. 8-9.

²¹ **E301/2**, ‘Co-Prosecutors’ Submission Regarding the Scope of Case 002/02 and Trial Schedule with Annex A’, 5 Dec 2013 (“OCP Submissions on Severance”), para. 11.

²² **D427**, Closing Order, paras. 784-790.

Chhmar Security Centre suggests a link between the 1975 Cham rebellions and the subsequent treatment of the Cham people.²³ In this regard, the Closing Order also notes the evidence of Ban Siek, former cadre of the Communist Party of Kampuchea (“CPK”) who briefly served as the district secretary of Kroch Chhmar District in 1978, that there was a rebellion by local Cham and Khmer people in 1978 and the order was to smash the “rebels”, regardless of their ethnicity.²⁴

17. Third, Kroch Chhmar Security Centre is the only crime site specifically charged in the Closing Order that relates to the charges of persecution and other crimes against the Cham people allegedly taking place in 1975. The other two crime sites charged in the Closing Order in relation to the treatment of the Cham people are Wat Au Trakuon Security Centre in the North Zone and Trea Village Security Centre in the East Zone.²⁵ The alleged crimes against the Cham people in relation to these two security centres are crimes allegedly committed in 1977 and 1978 respectively.²⁶ Leaving out the only crime site relating to the treatment of the Cham people in the early years of the DK regime (when senior officials of the current government were still in charge of the relevant region in DK²⁷) cannot be considered reasonably representative of the Case 002 indictment – a standard confirmed by the Supreme Court Chamber in its decision on the severance of Case 002 and referred to by Co-Prosecutors in their submissions on the severance.²⁸ Moreover, the Defence notes that the Co-Prosecutors do acknowledge the need to include charges of persecutions against the Cham people in late 1975 in the scope of Case 002/02. However, rather peculiarly, the Co-Prosecutors propose to keep the general charges in this regard as opposed to the specific crime site of Kroch Chhmar Security Centre.²⁹ As previously remarked, the Defence believes that the proposed

²³ **D427**, Closing Order, para. 773. “Most of the prisoners held at Kroch Chhmar Security Centre were Cham people from the villages of Kroch Chhmar District [...] The arrest and detention of the Cham escalated after the Cham rebellions in 1975. The people who were arrested were considered to be affiliated with the rebellions.” *See also*, para. 758, “Witnesses state that after the rebellions, the persecution towards the Cham significantly increased.”

²⁴ **D427**, Closing Order, para. 767.

²⁵ **D427**, Closing Order, paras. 776-790.

²⁶ **D427**, Closing Order, paras. 779, 780, 785 and 786. Although Wat Au Trakuon Security Centre was established in 1975 or 1976, the alleged crimes against the Cham people did not take place there until 1977.

²⁷ The senior officials of the current government were not in charge of Sector 21 of the East zone where Wat Au Trakuon Security Centre was located and they were no longer in charge of Sector 21 of the East zone in 1978 when the crimes in Trea Village Security Centre alleged took place.

²⁸ **E301/2**, OCP Submissions on Severance, para. 9, citing **E284/4/8**, ‘Decision on Immediate Appeals against Trial Chamber’s Second Decision on Severance of Case 002’, 25 Nov 2013, para. 70.

²⁹ **E301/2**, OCP Submissions on Severance, para. 12.

exclusion of Kroch Chhmar Security Centre is intended to shift away from any possible incrimination of present government officials.³⁰

(ii) *The Exclusion of Evidence Related to Current Senior Government Officials' Involvement in the Suppression of the 1975 Cham Rebellions*

18. After the request by Mr. Khieu Samphan to admit the HRW Report – *30 Years of Hun Sen* – was rejected by the Trial Chamber, the Defence requested the Chamber to reconsider its decision and to hear witness Sau Seimech³¹ regarding the treatment of the Cham people in late 1975 in relation to the Cham rebellions in Kroch Chhmar District.³² However, both requests were rejected by the Trial Chamber.
19. In rejecting the HRW Report and witness Sau Seimech, the Trial Chamber applied a not only erroneous but also much higher standard of scrutiny compared to the standard it usually resorts to in relation to similar documents and witnesses.³³
20. The Trial Chamber rejected the HRW Report based on the following reasoning:

It looks at historical events from a relatively narrow perspective, which is of limited use for the purpose of establishing factual findings in the present trial. Moreover, the Trial Chamber notes that the HRW Report appears to be more a summary of the multiple and diverse sources referenced than an assessment of said sources. This format necessitates thorough scrutiny of the referenced material. In this respect, the Trial Chamber observes that some references are particularly vague such as a “Journalist’s interview of local resident” and “NGO interview”, without any indication of the person interviewed (footnotes 55, 75, 88, 101, 107, 116 for instance; See also “according to a person living in the Chiro area” at page 18). Accordingly, the Trial Chamber finds that, as it stands, Chapter II of the HRW Report is unsuitable to prove the facts it purports to prove pursuant to Rule 87(3) and is not conducive to ascertaining the truth pursuant to Rule 87(4).³⁴

21. Such level of scrutiny, although suitable for the evaluation of evidence in the final stage of a trial, is much too high a standard for the stage of admitting evidence, which only requires *prima facie* reliability and probative value.
22. Moreover, ironically, the Trial Chamber itself did not apply such a standard in evaluating similar evidence it admitted in the judgement of Case 002/01. Numerous documents that “look[] at historical events from a relatively narrow perspective”, that

³⁰ E370, NC Witness Request for Cham Segment, para. 9.

³¹ For summary of the evidence, *see, supra*, paras. 8-9.

³² E370, NC Witness Request for Cham Segment, paras. 31-32; E347/2, NC Request to Admit HRW Report.

³³ For the Defence’s previous submissions on this, *see*, E347/2, NC Request to Admit HRW Report, para. 16.

³⁴ E347/1, ‘Decision on Khieu Samphan’s Request Pursuant to Internal Rule 87(4) to Admit New Documents to Case 002/02’, 29 Jun 2015, para. 4.

“appear to be more of a summary of the multiple and diverse sources”, and that refer to vague sources such as “villagers” were admitted by the Trial Chamber and heavily relied on in reaching its judgement in Case 002/01.³⁵ Most strikingly, the Trial Chamber relied on the anonymous evidence of a person described in François Ponchaud’s compilation of interviews as “Mr. Worker” to establish beyond reasonable doubt that Khmer Rouge soldiers shot and killed “a famous film actor” named Kong Savuon.³⁶

23. With regard to Sau Seimech, the Trial Chamber refused to hear him because: i) He only had “limited and indirect knowledge about the suppression of the Cham rebellions”. ii) He did not personally attend the meeting where orders to suppress the rebellions were issued. iii) He did not know the content of the messages he delivered between commanders of the Sector 21 forces. iv) He never received orders from Hun Sen.³⁷
24. Ironically, these reasons for rejecting to hear Sau Seimech are a description of the majority of the witnesses heard by the Trial Chamber so far. Moreover, none of the witnesses selected by the Trial Chamber to give live testimony on the treatment of the Cham people is in a position to give evidence on the identity of the troops sent to suppress the 1975 Cham rebellions, which makes Sau Seimech’s evidence highly desirable and unique compared to that of the selected witnesses.

(iii) The Omission of Kroch Chhmar Security Centre from the Request

25. As observed above, it is hard to believe that the omission of Kroch Chhmar Security Centre from the Request was an innocent and inadvertent mistake on the part of the LCLs. It appears to be an attempt to avoid incriminating current government officials.³⁸
26. While eagerly advancing the right and interest of the 446 civil parties admitted as victims of crimes related to the remaining charges in Case 002,³⁹ the LCLs seems to have overlooked the right and interest of about 14 civil parties admitted as victims of

³⁵ See, **F16**, NC Appeal, Sections VI(F) and VI(I); in particular, paras. 170-171 and 209-211.

³⁶ See, **F16**, NC Appeal, para. 317.

³⁷ See, **E370/4**, ‘Decision on Nuon Chea Request to Expedite Two Previously Proposed Witnesses and Summons Four Additional Witnesses during the Case 002/02 Trial Topic on the Treatment of the Cham and on National Co-Prosecutor’s Request to Admit Written Testimony in lieu of In-Court Appearance’, 25 Mar 2016, para. 21.

³⁸ See, *supra*, para. 5.

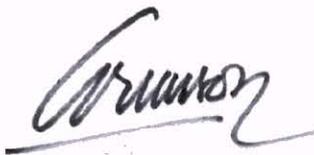
³⁹ **E439**, Request, para. 7.

crimes related to Kroch Chhmar Security Centre and the suppression of the 1975 Cham rebellions.⁴⁰

IV. RELIEF

27. Based on the foregoing, the Defence requests that the Trial Chamber include Kroch Chhmar Security Centre in any future discussions of the status of the remaining charges in Case 002.

CO-LAWYERS FOR NUON CHEA



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⁴⁰ E9/32.4.1, List of Civil Parties Admitted in Case 002, ERNs 00669197-98 (D22/163), ERNs 00669547-48 (08-VU-01935), ERNs 00671084-103 (09-VU-03536 to 09-VU-03543), ERNs 00671164-65 (09-VU-03620), ERNs 00671638-39 (10-VU-00011), ERNs 00672249-50 (07-VU-00214), and ERN 00672341 (07-VU-00100).