

AFFIDAVIT

I, [REDACTED] of Tula Toli, Maungdaw, Myanmar, currently residing in the refugee camps in Cox's Bazar, hereby declare that:

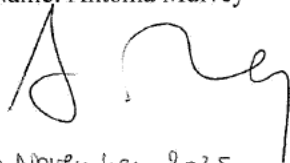
1. The statement I provided in 2020 in relation to the International Court of Justice (ICJ) case between The Gambia and Myanmar, and attached to this affidavit in its unredacted form, constitutes my full and complete testimony.
2. The names of two individuals (non-family) in my statement (§25) who also survived the Tula Toli massacre, have been initialized to protect their identity as my counsel could not reach them to seek their consent to lift redactions on their names.
3. I confirm that the contents of this statement are correct and true to the best of my knowledge. I further wish to inform the Court that I now have seven children – my one child who survived in Myanmar and is married (my other five children from my deceased wife died in 2017), three stepchildren from my new spouse, [REDACTED] previous marriage, and three children that we had in Bangladesh. Additionally, I wish to clarify that my 2020 statement mentioned that I was 40 years old at the time, which was my approximate age then; according to my official identity card, my age at the time was 43 years old, and I am currently 48. Further, in stating in the 2020 statement (§14) that the military used long “shas” to burn the houses, I meant that they used “launchers” to burn the houses in my village.
4. I affirm that I am making this affidavit voluntarily, and I am aware that my unredacted statement will be submitted to the ICJ and will be shared with the Judges of the Court and the other Party, in accordance with the Court's order.
5. I am aware about the security risks to which my family and I will be exposed as a result of our identities being disclosed to the other Party, given the reach of the Myanmar government within the camps in Bangladesh through operatives/informers who may threaten or harm us; this was the reason that I did not consent to disclosing my identity to the other Party in March 2023 upon request; nevertheless, I am confident in my decision to unredact my statement to the other Party to ensure full consideration of my statement and share the truth for justice. I remember everything that happened in Tula Toli clearly to this day.
6. I understand that I have been called to testify during the oral proceedings, and I agree to do so.
7. I understand that this affidavit and the attached unredacted statement and my testimony during the oral proceedings will remain confidential and will not be made public.

Witness name: [REDACTED]

Signed: [REDACTED]

Counsel Name: Antonia Mulvey

Signed:

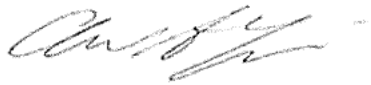


Date: 18 November 2025

Location: Geneva Switzerland

Counsel Name: Antonietta Trapani

Signed:



Date: 17 November 2025

Location: Kutupalong, Bangladesh

Interpreter Name:



Signed:



Date: 17 November 2025

Location: Kutupalong, Bangladesh



UNHCR
The UN Refugee Agency

proGres No:

(ইউএনএইচসিআর নং)

- FCN No:

(পরিবার খণ্ডের নং)

MoHA No: (জাতীয় পরিচয়পত্র নং)

Forcibly Displaced Myanmar National/Person of Concern to UNHCR
জোরপূর্বক স্থানচ্যুত মিয়ানমার নাগরিক/ইউএনএইচসিআর এর সাথে সংশ্লিষ্ট ব্যক্তি

The written statement of Witness MS referred to in this affidavit can be found in Annex 350 of The Gambia's Memorial