

INTERNATIONAL COURT OF JUSTICE

CASE CONCERNING THE SACRED COVENANT

(SARIAN REPUBLIC OF ASTORIA v. UNITED FEDERATION OF RENDOR)

ORDER OF 15 SEPTEMBER 2026

2026

COUR INTERNATIONALE DE JUSTICE

AFFAIRE CONCERNANT LE PACTE SACRÉ

(RÉPUBLIQUE SARIANE D'ASTORIA c. FÉDÉRATION UNIE DE RENDOR)

ORDONNANCE DU 15 SEPTEMBRE 2026

INTERNATIONAL COURT OF JUSTICE

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ORDER

The International Court of Justice,

After deliberation,

Having regard to Articles 40 and 48 of the Statute of the Court and to Articles 31, 44, 45, and 48 of the Rules of Court;

Having regard to the Application filed in the Registry of the Court on 12 May 2026, whereby the Sarian Republic of Astoria (Astoria) instituted proceedings against the United Federation of Rendor (Rendor) with respect to a dispute concerning the Sacred Covenant and certain other matters;

Whereas the Registrar immediately communicated the Application to the Government of Rendor in accordance with Article 40(2) of the Statute of the Court, and notified the Secretary-General of the United Nations of the filing of the Application by Astoria;

Whereas Astoria and Rendor have appointed their respective Agents;

Whereas, by an Order of 15 June 2026, the Court decided that Rendor's objections to jurisdiction would be considered together with the merits, and requested the Parties to submit a Statement of Agreed Facts without prejudice to those objections;

Whereas, in compliance with that Order, the Parties jointly communicated the attached Statement of Agreed Facts to the Court on 10 September 2026, indicating in their communication their agreement that Astoria would appear as Applicant and Rendor as Respondent, without prejudice to any question of the burden of proof; and

Taking into account the views of the Parties;

Fixes the dates for the filing of the written and oral pleadings as the dates set forth in the Official Schedule of the 2027 Philip C. Jessup International Law Moot Court Competition;

Declares that nothing in this Order, in the Parties' preparation or submission of the Statement of Agreed Facts, or in their participation in these proceedings shall prejudice Rendor's objections to the jurisdiction of the Court, nor shall such participation be construed as recognition by Rendor of SARCO or its representatives as the Government of Astoria; and

Adopts the Official Rules of the 2027 Philip C. Jessup International Law Moot Court Competition as governing the proceedings in this matter.

Done in English and French, the English text being authoritative, at the Peace Palace, The Hague, this fifteenth day of September, two thousand and twenty-six, in three copies, one of which will be placed in the Archives of the Court and the others transmitted to the Governments of Astoria and Rendor, respectively.

(Signed)
President

(Signed)
Registrar

STATEMENT OF AGREED FACTS
CASE CONCERNING THE SACRED COVENANT

(Sarian Republic of Astoria v. United Federation of Rendor)

10 SEPTEMBER 2026

1. For centuries, the port city of Revlin, on the northern coast of Corian Bay, was the principal trading center in the region. In 1846, the surrounding territories were consolidated into the United Federation of Rendor, with Revlin as its capital. Over the ensuing decades, and to this day, Revlin has become a regional hub for finance and culture.
2. Rendor is a constitutional democracy with a population of approximately 41 million, an economy anchored in technology, financial services, manufacturing, and maritime commerce, and a GDP last estimated at USD 1.2 trillion. Its current constitution, adopted in 1950, guarantees freedom of religion and conscience, and more than a dozen religions flourish in the country. Rendor joined the United Nations and thereby became a party to the Statute of the International Court of Justice in 1952.
3. Adherents to the ancient Sarian religion have inhabited the territories along the south coast of Corian Bay for more than two millennia. Historically, they organized themselves into autonomous city-states and rural communities governed by local clerical councils. In the early twentieth century, these territories joined together, forming the Sarian Republic of Astoria as a unified state. It lies some 400 kilometers across the Bay from Rendor.
4. Astoria's population is just over 26 million. Its GDP was last estimated at USD 210 billion, with an economy dependent on agriculture and mineral extraction, and most recently, the mining and exportation of gypsum. Approximately 97 percent of its citizens identify as Sarian, making it one of the most religiously homogeneous states in the world. The capital of Astoria, Accepia, is located inland.
5. By 1985, both Astoria and Rendor had established territorial seas extending 12 nautical miles from their respective baselines.
6. As of the middle part of the twentieth century, Astoria was ruled by a body of 21 Sarian clerics called the Sarian Ancestral Faith Authority (SAFA) and presided over by a "High Prelate."

SAFA exercised the exclusive power to make laws for the country. Upon the death, disability, or retirement of one of its number, the remaining members of SAFA selected his successor from the ordained Sarian clergy.

7. During this period, Astorian society was governed according to SAFA's interpretation of Sarian doctrine, including what it referred to as "traditional family values." Women were required to obtain permission from the male head of household to pursue education beyond the age of 16, to engage in certain careers, or to participate in business or political life. In practice, such permission was rarely granted. While these restrictions were enforced by local clerics, they were not codified in law.

8. Astoria joined the United Nations in July 1979. It played no role in the negotiation or drafting of the Convention on the Elimination of All Forms of Discrimination against Women (CEDAW). Astoria's representative abstained in the vote on UN General Assembly Resolution 34/180 adopting the Convention, calling it "in its text and in its implications incompatible with the immutable tenets of the Sarian faith."

9. Beginning in the late 1970s and through the 1980s, an underground movement rooted in a more flexible interpretation of Sarian doctrine emerged. Led by Michal Esaf, a young professor of economics, the movement called for free elections of political leaders, greater rights for women, and increased trade with regional partners. By 1990, it had obtained the support of significant numbers of urban dwellers and university students. Several demonstrations during this period led to arrests for disorderly conduct or disturbing the peace and were condemned from the pulpits of many Sarian houses of worship.

10. In 1993 and 1994, severe drought prevented the profitable exportation of many agricultural commodities on which the Astorian national economy then largely relied, and the country fell into a severe recession. SAFA struggled to provide basic public services. In March 1994, Professor Esaf convened a meeting of the leaders of his movement, calling for nationwide strikes and protests to urge SAFA to hold popular elections for what he called "a properly empowered legislative assembly." After weeks of ever larger demonstrations by Astorians frustrated by the continuing deterioration of their standard of living, the High Prelate announced that the government would "empower a 100-member Parliament, to be elected by the people in accordance with the precepts of our Sarian faith." He welcomed and endorsed the candidacy of members of SAFA and their

followers, stating his confidence that “the nation will embrace modest reform, but we will not turn our backs on our traditions.” Suffrage was limited to adult males.

11. The first legislative elections were held on 26 November 1994. A slate of candidates from the newly formed National Unity Party (NUP), as Esaf’s coalition named itself, won 63 seats, with 37 going to SAFA-supported candidates. The legislature adopted a new constitution on 16 January 1995, providing for a largely ceremonial head of state and a prime minister, both chosen by Parliament, and an independent judiciary. Sarianism remained the official state religion, and the constitution provided that legislation “shall be consistent with the principles of our shared and eternal faith.” Michal Esaf was elected Prime Minister.

12. Along with other states in the region, Rendor supported Astoria’s social reforms, sending legal, commercial, and technical delegations to provide assistance beginning in early 1995. Those partners conditioned continued aid and improved trade relations on Astoria’s accession to the 1985 Corian Bay Regional Agreement (COBRA), a regional treaty governing relations among neighboring states. Rendor and nine other states in the region were original parties. In June 1995, Astoria acceded to COBRA, which entered into force for it on 1 September 1995. The Agreement included, *inter alia*, the following provisions:

Article 7 – Expropriation

Investments of nationals of a High Contracting Party in the territory of another High Contracting Party shall not be nationalized, expropriated, or subjected to measures having effect equivalent to nationalization or expropriation, except for a public purpose, in accordance with due process of law, and upon payment of prompt, adequate, and effective compensation.

Article 12 – Resolution of Disputes

- (1) Any dispute between two High Contracting Parties concerning the interpretation or application of a treaty, any question of international law, the existence of any fact which, if established, would constitute a breach of an international obligation, or the nature or extent of reparation for such a breach shall first be submitted to negotiation.
- (2) Should negotiation fail to resolve the dispute, it shall, at the request of either Party, be referred to the International Court of Justice for decision.
- (3) In the event that such a dispute is referred to the Court, the Respondent Party may submit a counterclaim against the Applicant Party, provided that the counterclaim is directly connected with the subject matter of any of the Applicant Party’s claims before the Court. A counterclaim shall not be subject

to the requirement of prior negotiation. Where the Respondent has objected to the jurisdiction of the Court, the submission of a counterclaim shall not be deemed a waiver of that objection.

The Parties stipulate that no other part of COBRA is relevant to the present proceedings. Both COBRA and Astoria's accession to it were duly registered under Article 102 of the UN Charter.

13. Economic relations between Astoria and Rendor increased following Astoria's accession to the Agreement. For example, the Castell Group, a multinational telecommunications, logistics, and financial services company incorporated in Astoria whose majority shareholder is Shayan Castell, an Astorian national, created a wholly owned subsidiary, Castell Drywall Ltd. Castell Drywall was incorporated in Rendor in early 1996. The parent company injected USD 150 million into its subsidiary, which used the funds to acquire real estate and establish a facility in Revlin to manufacture drywall from gypsum purchased from its Astorian affiliate, Castell Mining Ltd. Over the following 18 months, Castell Drywall hired 300 factory workers and support staff to conduct its operations.

14. The ensuing decade saw the NUP government gradually expand the legal recognition of women's rights. In 2001, Parliament enacted legislation guaranteeing the vote to all adult women and affirming the right of women to hold elected office.

15. In multilateral fora including the UN General Assembly, the NUP repeatedly reiterated the SAFA government's previous objections to any international codification of what it saw as a norm requiring the broad elimination of gender-based distinctions. For example, although it participated in the 1995 World Conference on Women which led to adoption of the Beijing Declaration, the Astorian delegation announced that its implementation measures would apply only "insofar as they conform to the precepts of Sarian law and tradition."

16. The effect of the NUP government's programs was uneven. In urban areas, girls' school enrollment was near-universal by 2005, and women pursued higher education, operated businesses, appeared in court as both parties and counsel, and engaged in a wide range of professions. By 2020, 11 of the 100 Members of Parliament were women.

17. In rural areas, however, the education of women and girls, and their participation in public life, remained at pre-1994 levels. Citizens observed the precepts of orthodox Sarianism. Clerics continued to oversee and to resolve matters relating to marriage, divorce, and transfer of property

after death, and encouraged women to prioritize “their natural duties as homemakers and caregivers.” They regularly denounced NUP reforms as incompatible with Sarian scripture.

18. Although the NUP retained its parliamentary majority in elections held in 2000, 2006, 2012, and 2018, and Esaf remained Prime Minister throughout the period, the party’s margin of victory dwindled in each successive ballot. SAFA-affiliated clerics railed against “the erosion of our Sarian standards,” which they attributed to foreign influence, often singling out “our cosmopolitan neighbors,” particularly Rendor, as “leading us astray.”

19. During its Universal Periodic Review in 2021, Astoria again stated that it “maintains its religiously motivated objection to any alleged rule of customary international law supposedly requiring that UN Member States abolish all differences in the treatment of men and women.”

20. In October 2023, at an international meeting of women’s rights organizations, Rendor declared its adoption of a Feminist Foreign Policy, committing to “center gender equality in all aspects of our foreign relations, including diplomacy, development cooperation, trade, refugee resettlement, and security.” The announcement included a pledge to expand refugee protection for “individuals fleeing gender-based persecution,” and to use Rendor’s diplomatic and economic influence “to advance gender justice globally.”

21. Candidates backed by SAFA seized on international developments regarding the role of women, and specifically Rendor’s new policy, as a theme of their campaign leading up to the 2024 parliamentary elections. By March of that year, pro-SAFA rallies were occurring weekly across the countryside, with some protestors openly carrying arms. SAFA’s High Prelate, Nikolas Dremov, dedicated his June 2024 national address to the topic, concluding:

The NUP seems intent on eroding our national sovereignty and sacrificing our way of life on the altar of what it calls progress. But what it offers is not progress but apostasy. Its way is not liberty but godlessness. The NUP promises us a path of development and wealth, but that road leads to nothing but temptation and compromise. We need only look across the Bay to Rendor to see that what I am saying is true. We are under attack. If we care about our traditions, this election is our last chance. Our family values, our sacred principles, honored by our forefathers since time immemorial, are on the ballot. And you, as citizens and as Sarians, must use that ballot to defend our country.

22. In the general election in November 2024, the NUP won 45 of the 100 constituencies, and announced its intention to form a government in coalition with eight independent candidates

elected from urban districts. SAFA won 41 seats, with the remaining six going to independent traditionalists sympathetic to SAFA. The coalition announced that it would support Esaf for another term as Prime Minister. High Prelate Dremov denounced the result, declaring the election outcome “inconclusive,” “highly suspicious,” and “tainted by foreign influence.” He demanded that a new ballot be held, and said that otherwise, “all faithful Sarians must now rise up and restore the sacred order.”

23. The inaugural session of the new Parliament was convened on 2 December 2024. A protest rally began outside the building early that morning. Shortly after the meeting was called to order, demonstrators, many of them carrying firearms, entered the Parliament building, where they were met by unarmed police officers. Twenty-three people, including four parliamentarians, were killed in the ensuing violence. Over the next 72 hours, SAFA-aligned armed groups, joined by sympathetic military and law-enforcement units, seized control of all government ministries, security installations, and state television and radio stations in Acepia.

24. High Prelate Dremov declared himself Head of State and dismissed Prime Minister Esaf and the government. Dremov then appointed his 12 closest advisers, all SAFA clerics, to serve as “the Sarian Restoration Council of Astoria” (SARCO), the country’s interim ruling council. SARCO promptly dissolved the Parliament and announced that the constitution “has been suspended, effective immediately, and will be replaced by a new charter, properly grounded in divine law,” to be written by SARCO. Professor Esaf, from an undisclosed location, issued a communiqué condemning what he called “an illegal, unconstitutional, and anti-democratic coup d’état” and called on the international community to refuse to recognize “the regressive regime that seeks to impose its will on the Astorian people by violence and terror.”

25. Within weeks, SARCO assumed control over most Astorian territory, exercising all functions of government, including taxation, law enforcement, and border control, with reports of scattered violence in some areas and many arrests, but no further deaths.

26. The new constitution (called “The Sacred and Eternal Covenant of the Astorian People”) was unveiled by High Prelate Dremov, surrounded by the members of SARCO, in a televised ceremony on 23 January 2025. Relevant provisions of the Sacred Covenant are attached to this Statement of Agreed Facts as Annex I. Among other things, it restructured public life along strict gender-based lines, reflecting SARCO’s interpretation of Sarian scripture, and empowered the

newly created Ministry of Virtue Enforcement to issue binding decrees to implement these principles.

27. On 28 February 2025, meeting in its Thirty-third Special Session to consider the situation in Astoria, the United Nations General Assembly adopted Resolution S-33/1, which “deplore[d] the violent and unconstitutional seizure of power in Astoria” and “call[ed] upon all states to refrain from recognizing the SARCO government unless and until it demonstrates the support of the people through free and fair elections.” The Resolution passed with 144 votes in favor (including Rendor), 8 against, and 28 abstentions. Astoria did not participate in the debate or vote. Rendor closed its embassy in Accepia on 10 March 2025, designating a “Rendorian Interests Section” in the embassy of the Republic of Bakinostan, one of five UN Member States that continued to maintain diplomatic premises in Astoria.

28. In March 2025, one of the Castell Group companies in Astoria entered into contracts with SARCO to build and operate telecommunications infrastructure for the Ministry of Virtue Enforcement, to provide logistics and transportation services for Ministry officials, and to create broadcast media content promoting SARCO’s messaging.

29. With the approval of SARCO, the Ministry proceeded to publish compulsory rules governing dress, public conduct, modesty, education, employment, guardianship, and travel, including a series of decrees imposing sweeping restrictions on women’s participation in public life. Women were barred from employment in most sectors of the economy, including government offices, non-governmental organizations, and the media. They were denied the right to own, transfer, or inherit real property, and were required to be escorted by male guardians whenever they left their homes. Formal education for girls beyond age 11 was banned. The decrees also mandated modest garments in accordance with Sarian principles, requiring that a solid-colored cape dress, paired with an apron and a head covering, be worn by women and girls over seven years of age when in public. Cosmetics, jewelry, and perfume were prohibited, and all beauty salons were closed. Men were also required to wear traditional Sarian attire. Women were prohibited from public speaking, having their voices broadcast on radio or television, operating motor vehicles or riding bicycles, and entering parks, gyms, public baths, and sports arenas.

30. Within two months, all girls’ secondary schools were closed, and women faculty and students were dismissed from universities. Over 1.3 million female students aged 12 and over were

removed from formal education. More than 640,000 women lost employment, including all of those serving as civil servants. The Ministry of Virtue Enforcement established checkpoints and patrols in major cities to cite and apprehend violators.

31. International human rights organizations condemned these measures. On 2 June 2025, the International League for Social Access (ILSA) – a coalition of 87 international human rights organizations – issued a statement that included the following:

SARCO is systematically denying fundamental human rights based on gender, in flagrant disregard for the purposes and principles of the United Nations Charter, as well as customary international law binding on all states. The regime that it has imposed can accurately be characterized as gender apartheid.

32. On 19 July 2025, Rendor’s Minister of Foreign Affairs Yen Ba Tran described what was unfolding in Astoria as “the intentional deprivation of basic human rights contrary to international law, resulting in the deliberate, systematic, and institutionalized subjugation of half the population of the country” and “a crime against humanity.”

33. On 25 July 2025, the Prime Minister of Rendor, Nanami Torune, announced that, effective immediately, the government was imposing sanctions against certain entities and individuals associated with Astoria. The sanctions would be administered by the Bureau of Financial Security (BFS), part of the Ministry of Finance. Torune described the targets as “instrumental in establishing and enforcing gross and systematic violations of the fundamental human rights of women and girls.”

34. The sanctions prohibited designated entities and individuals from accessing, transferring, or disposing of their assets and suspended performance of contracts between targeted businesses and any person or company subject to Rendorian law. According to the announcement, these steps were adopted in response to Astoria’s “continuing violations of fundamental human rights” and “are intended to induce Astoria to bring those violations to an end.” The announcement went on to state that the measures reflected “Rendor’s obligations to promote human rights globally and to maintain international peace and security, which this government considers its highest responsibilities to the people of our country and the world.”

35. In identifying potential targets for designation, BFS used an artificial intelligence system to generate a preliminary list of persons and companies potentially meeting the applicable criteria.

BFS officials independently reviewed and verified the factual basis of each proposed designation before making final recommendations to the Prime Minister. The sanctions were to be subject to automatic annual review and could be lifted should a targeted individual or company “demonstrate a reversal of its support for the oppressive gender-based restrictions in Astoria.”

36. In a press conference the following day, Prime Minister Nanami Torune said the sanctions “are part of our commitment to the consistent application and enforcement of our Feminist Foreign Policy.” When asked by a reporter whether indefinitely denying owners access to their property was equivalent to dispossessing them, she responded:

The sanctions do not deprive anyone of ownership of anything. They merely restrict access to certain designated assets. We will gladly lift the sanctions once the human rights crisis in Astoria has been resolved, or lift them for a particular target if a court finds that target eligible for relief.

37. The most prominent business sanctioned was the Castell Group, including its Rendor-based subsidiary, Castell Drywall. BFS notified Castell Drywall of its designation and of its right to challenge the decision in Rendorian courts. The company had a week earlier signed a three-year USD 400 million contract to supply drywall to a consortium of private construction concerns in Rendor. After the sanctions were announced, those companies suspended all orders under the contract, “such suspension to remain in effect until resumption is consistent with applicable law.”

38. Castell Drywall filed a civil action in the Revlin District Court, seeking to overturn the sanctions on an emergency basis, making two arguments: first, that the order constituted “an unlawful taking of private property by the government without due process of law,” in violation of the Rendorian Constitution and international law; and second, that there was no rational basis for targeting Castell Drywall, which had lawfully conducted business in Rendor for years prior to SARCO’s seizure of power.

39. An opinion was issued by Revlin District Court Judge Matei Costinin in Castell Drywall’s lawsuit on 22 August 2025. In relevant part, the court concluded that:

The Prime Minister’s Order recites that Castell Group was “instrumental in establishing and enforcing” the system of gender apartheid that appears to be the policy of those now governing Astoria. The evidence before me is sufficient to justify that decision. The facts are not seriously disputed. And given that the Order does not purport to deprive anyone of ownership of property, I find that there has been no “taking” in violation of our law or Constitution. I conclude that the

application of the sanctions to Castell Drywall does not contravene Rendorian law or the Constitution, and I therefore grant the government's motion to dismiss this case.

The Rendorian Supreme Court affirmed the decision on 22 September 2025 without oral argument, and no further appeals are available.

40. The freezing of Castell Drywall's assets rendered the company unable to pay its Rendorian employees, to utilize its manufacturing facilities, and to access its operating accounts to remit payments for imports of raw materials. Within weeks, its operations in Rendor ceased entirely, resulting in the cancellation of its supply contracts with Castell Mining. This dealt a significant blow to Astoria's economy, where the gypsum mining sector had become a major employer and a critical source of export earnings. On 27 July 2026, following the first annual review required by the sanctions order, BFS determined that the designation of Castell Group would not be altered. As of the date of this Statement of Agreed Facts, the asset freeze remains in effect.

41. On 23 September 2025, High Prelate Nikolas Dremov denounced the sanctions during a televised interview, stating:

These measures are said to be temporary, but it is clear that they are not. We are never going to back down, and we are never going to be bullied into abandoning the way of life dictated by our faith. Let me be frank and direct. What Rendor is doing in the name of virtue is nothing less than theft, government-sanctioned theft, from Sarian individuals and businesses whose patriotism has been exemplary. These measures are causing serious economic consequences for Astorian workers in the mining sector. This cannot stand. From a country fancying itself a champion of international law, this is the height of hypocrisy.

42. On 1 October 2025, the SARCO Minister of Foreign Affairs, Matthew Cannery, sent a *démarche* to Rendorian Foreign Minister Yen Ba Tran, asserting that the sanctions regime violated Article 7 of COBRA, and demanding "negotiations with a view to addressing the unlawful sanctions imposed by Rendor." Minister Cannery stated that the freezing of assets of a conglomerate with extensive operations had consequences beyond the designated entities, disrupting ordinary commercial relationships and causing significant unemployment. He denied that the cited reasons for imposing the sanctions constituted a public purpose: "To the contrary, it is an unabashed effort to interfere in the sovereign affairs of another United Nations Member State."

43. Minister Yen Ba Tran did not respond directly to the démarche. When questioned by reporters, Minister Tran said:

Rendor does not recognize SARCO as the legitimate government of Astoria. We will not engage in negotiations with an entity that seized power through violence, and that uses such power to violate human rights. Neither COBRA nor any other legal norm requires us to do so. Indeed, international law compels us not to respond.

44. On 10 October 2025, Prime Minister Torune announced, in a speech before Parliament, that, following ILSA's characterization of the treatment of women in Astoria as "gender apartheid," it was the intention of her government, as part of its commitment to its Feminist Foreign Policy, to promote international recognition of the prohibition of gender apartheid as an established rule of international law.

45. In the same statement, the Prime Minister declared that Rendor would "open its doors to women and girls fleeing the gender apartheid now victimizing them in Astoria." She announced that, effective immediately, the Immigration Service would be directed to implement a program called "Expedited Asylum Review" (EAR), prioritizing and accelerating the processing of Astorian female asylum applicants. Those individuals would be presumed to meet the requirements of Article 1(A)(2) of the Refugee Convention of 1951, as modified by the Protocol of 1967, because they had a "well-founded fear of being persecuted for reasons of ... membership of a particular social group." She added, "This change in immigration policy will not affect the processing of male applicants, although close relatives of Astorian female asylum seekers, including husbands, sons, fathers, and brothers, will also receive favorable consideration."

46. The EAR program offered successful applicants immediate work authorization, language and housing assistance, targeted stimulus payments designed to facilitate rapid entry into Rendor's labor market, an accelerated path to permanent residence, and eventual citizenship after five years.

47. Before the end of October, 1,847 Astorian females and 2,263 Astorian males flew by commercial carriers to Revlin International Airport, where they claimed asylum. Of those, all of the women and girls, and 72 percent of the men and boys, were accepted as refugees under EAR.

48. On 10 November 2025, High Prelate Dremov announced the introduction, effective the next day, of an exit visa program. The order, transmitted to all airports, seaports, and border crossings, provided that all Astorian citizens seeking to travel abroad were required to have in their

possession a visa issued by the Ministry of Home Affairs, available only upon submission of documentation identifying their intended destination, reason for travel, and planned date of return. The Ministry was instructed to reject applications from individuals who stated that they intended to visit or transit through Rendor, or whose demeanor or answers to questions gave the authorities reason to suspect that they were preparing to emigrate.

49. The exit visa requirement had the immediate effect of reducing the number of Astorian citizens claiming asylum at Revlin Airport to fewer than ten per day. As legal travel to Rendor became effectively impossible, maritime crossings quickly emerged as the principal route for Astorians attempting to reach Rendor. Over the next two weeks, individuals began to seek access to Rendor by crossing Corian Bay by boat without exit visas. In the months of November and December, some 1,500 Astorian women and 950 Astorian men reached Rendor's territorial waters, where they were met by patrol boats that brought them safely to land for processing.

50. In early January, ILSA reported that at least three makeshift vessels had capsized in the Bay, and the bodies of 65 people were recovered in international waters by Rendorian rescue workers. The report received extensive international media attention and prompted widespread concern.

51. Rendor's Representative to the United Nations in New York, Ishita Naveen, requested that the Secretary-General demand an explanation from Astoria. She declared:

These deaths were foreseeable. SARCO has left Astorian citizens to choose between persecution at home and death at sea. Those who perished did so because SARCO denied them a safe path to freedom. These cruel restrictions must be rescinded, and Astorians must be permitted to leave their country safely. Until this happens, Rendor will not stand idly by as the Bay becomes a graveyard for men, women, and children fleeing oppression and seeking refuge and opportunity on our shores.

52. Minister Cannery responded two days later, stating:

My government played no role in causing these tragic deaths. The responsibility lies entirely with Rendor, which pursues a policy of encouraging, incentivizing, and facilitating emigration of our citizens, on the false pretext that our women are facing persecution for living according to sacred scripture. Rendor cannot manufacture a humanitarian crisis and then invoke that crisis as a license to violate international law by interfering in our sovereign affairs.

53. On 16 January 2026, Rendor announced the deployment of a naval vessel – the R.N.S. Schwebel – to a position 12.5 nautical miles from Astoria’s baseline, saying:

The Government of Rendor is horrified by the loss of life now taking place in Corian Bay. We are resolved to provide aid to people stranded at sea, often on makeshift vessels not suited to cross open water. And if any person rescued in this operation requests asylum, we will bring them to Rendor to determine their eligibility.

54. Although Rendor declines to indicate the precise number of individuals who boarded the Schwebel, the ship began weekly journeys between its designated position and Rendor. In mid-February 2026, the *Lianhe Zaobao* newspaper reported that a motorboat carrying approximately 22 people had been apprehended by the Astorian Coast Guard as it reached hailing distance from the Schwebel. The boat was turned around and apparently returned to Astoria.

55. On 3 March 2026, High Prelate Dremov gave a televised address to the nation from his office in Accepia. His remarks included the following:

My fellow Astorians, Rendor has stationed a warship off our shores to lure our Sarian brothers and sisters from their homeland, their families, and their faith. Those who answer its call commit sacrilege, forsaking the Sacred Covenant and betraying the inheritance entrusted to us by our ancestors. Our Coast Guard will continue to defend our borders and to enforce our laws. But our brave sailors will not be ordered to risk their own lives to rescue those already lost. People who abandon the path of righteousness do so at their own peril. Should the Almighty exact the price of their transgression, Rendor will bear the guilt for having led them astray. I hereby inform all citizens of this nation: if you make this choice, if you turn your back on us and on the Astorian way of life sanctified by our forebears, we will not help you, and we will not support you. If you choose to travel this road, it is up to you to find your own way to the end of it.

56. Three days later, Admiral Eriq Holden, Rendor’s Chief of Naval Operations, ordered 10 Navy cutters to rescue people attempting to cross Corian Bay. The cutters regularly operated outside Astoria’s territorial sea, but on occasion approached as close as 6.5 nautical miles from shore to patrol for vessels that might require assistance. They took individuals aboard when asked for help or when the commanding officer determined that a vessel or its passengers appeared to be in danger. Such people were transported to the Schwebel and then to Rendor during the ship’s weekly return to port. Admiral Holden stated that Rendor had “a moral duty to rescue human beings facing peril, whether or not they are in international waters.”

57. On 23 March 2026, Sagnik Morei, SARCO's Special Envoy for Rendorian Affairs, transmitted a diplomatic note through the Embassy of Bakinostan to the Rendorian Foreign Minister, which read in relevant part as follows:

The incursion of Rendorian naval vessels into Astorian waters, for the express purpose of intercepting our citizens and asserting custody over them, is a grave violation of Astoria's territorial integrity. The Schwebel loiters just beyond our territorial sea while its cutters prowl our waters in breach of international law. These vessels are not engaged in innocent passage. In fact, nothing about their presence is "innocent."

Nor are these isolated provocations. The Expedited Asylum Review program was adopted for the express purpose of encouraging mass emigration from Astoria. It is state-sponsored kidnapping disguised as benevolence.

Rendor's economic sanctions are yet another component of a campaign of interference and aggression. These measures levied against the Castell Group are causing severe dislocation and disruption in Astoria, and they are in open violation of COBRA.

My government therefore demands that Rendor enter into negotiations with us pursuant to Article 12 of COBRA concerning both of these disputes: its unlawful programs of naval operations and economic sanctions. Should negotiations fail to produce an amicable resolution, Astoria will refer these disputes to the International Court of Justice, where we are certain that Divine providence will see us prevail.

58. Minister Yen Ba Tran responded with a *note verbale* delivered to the Ambassador of Bakinostan in Accepia a few days later. They wrote:

Mr. Morei, through the good offices of the Ambassador of Bakinostan I have received your letter, and I am imposing upon his continued courtesy to deliver this reply. As my government has previously made clear, the February 2025 General Assembly Resolution requires all Member States "to refrain from recognizing" the Sarian Restoration Council of Astoria. More importantly, SARCO is engaged in systematic gender apartheid, disdaining fundamental principles of international law. Rendor will not confer legitimacy upon an illegitimate authority responsible for such violations. My government therefore declines to discuss either our lawful and justified sanctions program or our humanitarian search and rescue efforts with you or with any other representative of SARCO.

The note was duly forwarded to Mr. Morei.

59. On 12 May 2026, Astoria filed an Application with the ICJ Registry instituting proceedings against Rendor and asserting the claims set forth in paragraphs 63(b) and (c) below. The Application asserted that Astoria had attempted without success to negotiate a resolution and that any further efforts would be futile.

60. On 26 May 2026, Rendor submitted a letter contesting the Court's jurisdiction, stating in relevant part:

Rendor does not accept that the SARCO regime constitutes the legitimate government of Astoria, or that its representatives are in a position to act on behalf of the Astorian State. Rendor will not recognize as lawful the situation created by SARCO's gross violation of the rights of half of its population, nor will we tolerate that situation going forward. On the contrary, Rendor is obligated to cooperate with other states in bringing the illegalities to an end. Negotiating with SARCO as if it were the Government of Astoria would be incompatible with those obligations. There has been, and there will be, no negotiation between our government and SARCO.

Without prejudice to the foregoing objection, Rendor intends to seek a declaration that the "Sacred Covenant" and SARCO's decrees constitute a regime of gender apartheid, the prohibition of which we respectfully invite the Court to conclude has become a norm of customary international law.

61. On 15 June 2026, the Court issued an Order deciding that Rendor's objections to jurisdiction would be considered together with the merits and directing the Parties to prepare and submit a Statement of Agreed Facts, without prejudice to those objections.

62. Both states are, and have been at all relevant times, parties to the United Nations Charter; the Statute of the International Court of Justice; the Vienna Convention on the Law of Treaties; the Convention Relating to the Status of Refugees (1951) and its 1967 Protocol; the Convention on the Prevention and Punishment of the Crime of Genocide; the Convention against Torture and Other Cruel, Inhuman or Degrading Treatment or Punishment; the United Nations Convention on the Law of the Sea; and the International Convention on the Elimination of All Forms of Racial Discrimination. Rendor is also, but Astoria is not, a party to the Convention on the Elimination of All Forms of Discrimination against Women; the Rome Statute of the International Criminal Court; and the International Covenant on Civil and Political Rights. Neither state is a party to any other treaty of relevance to this case.

63. *Astoria, as Applicant, respectfully requests the Court to adjudge and declare that:*
- (a) The Court has jurisdiction under Article 12 of COBRA to adjudicate Astoria's claims but lacks jurisdiction over Rendor's counterclaim;
 - (b) Rendor's sanctions affecting Castell Group's investment in Castell Drywall violate Article 7 of COBRA;
 - (c) Rendor's incursions into Astorian territorial waters violate international law; and
 - (d) Astoria's legal regime does not violate customary international law because no prohibition of gender apartheid is recognized thereunder, and, in any event, Rendor lacks standing to bring such a claim.
64. *Rendor, as Respondent, respectfully requests the Court to adjudge and declare that:*
- (a) The Court does not have jurisdiction to adjudicate the claims presented by Astoria, but has jurisdiction to hear the counterclaim;
 - (b) Rendor's sanctions affecting Castell Group's investment in Castell Drywall do not violate Article 7 of COBRA;
 - (c) Rendor's maritime rescue missions in Corian Bay do not violate international law; and
 - (d) Astoria's legal regime constitutes gender apartheid in violation of customary international law, and Rendor has standing to bring that claim.

ANNEX I

Excerpts from The Sacred and Eternal Covenant of the Astorian People

PREAMBLE

In the Name of the Almighty Sar,

Conscious that nations flourish only when they remain faithful to the truths entrusted to them by the Creator; grateful for the courage of those who restored the ancient Sarian order; rejecting the corruption, materialism, and moral disorder that had led our people away from the path established by our ancestors,

We, the people of Astoria, establish this Sacred Covenant to preserve the Sarian faith, defend the family, secure justice according to Divine Law, and transmit to future generations the moral inheritance entrusted to our nation.

* * *

Article 2. The Nature of the State

- (1) Astoria is a sovereign Sarian Republic founded upon the revealed principles of the Sarian faith.
- (2) No law, regulation, judicial decision, or governmental act shall be valid if inconsistent with the Sacred Scriptures or this Covenant.

* * *

Article 11. The Family

- (1) The family is the fundamental institution of Astorian society.
- (2) The Almighty Sar created man and woman. No earthly act can alter that Divine Law.
- (3) Men and women possess equal worth but are created for distinct and complementary responsibilities ordained by Divine Law. A woman's sphere is the home; a man's primary sphere is the world beyond it. The State shall preserve and enforce these distinctions in all aspects of life.

- (4) The protection of women shall be secured through laws reflecting their unique dignity, responsibilities, and vocation within the family and the Nation.

* * *

Article 17. The Institutions of Government

- (1) Legislative authority shall be exercised by the National Assembly, which may delegate such authority to the Sarian Restoration Council whenever necessary to preserve the security, morality, and religious integrity of the Republic.
- (2) Members of the National Assembly shall be elected in accordance with law by adult male citizens meeting the qualifications prescribed by the National Assembly.
- (3) The High Prelate, as head of state, shall ensure that all legislation faithfully implements this Covenant, and his consent must be obtained before any proposed legislation becomes law.
- (4) The Sarian Restoration Council shall invalidate any law inconsistent with this Covenant or Divine Law.
- (5) The Sarian Restoration Council shall advise all branches of government on questions concerning interpretation of the Sacred Scriptures.

* * *

Article 23. Executive Authority

- (1) Executive authority shall be exercised by the Sarian Restoration Council under the leadership of the High Prelate.
- (2) Any decree promulgated with the approval of the Council shall have the force of law and remain in force until modified or repealed by the National Assembly.

* * *