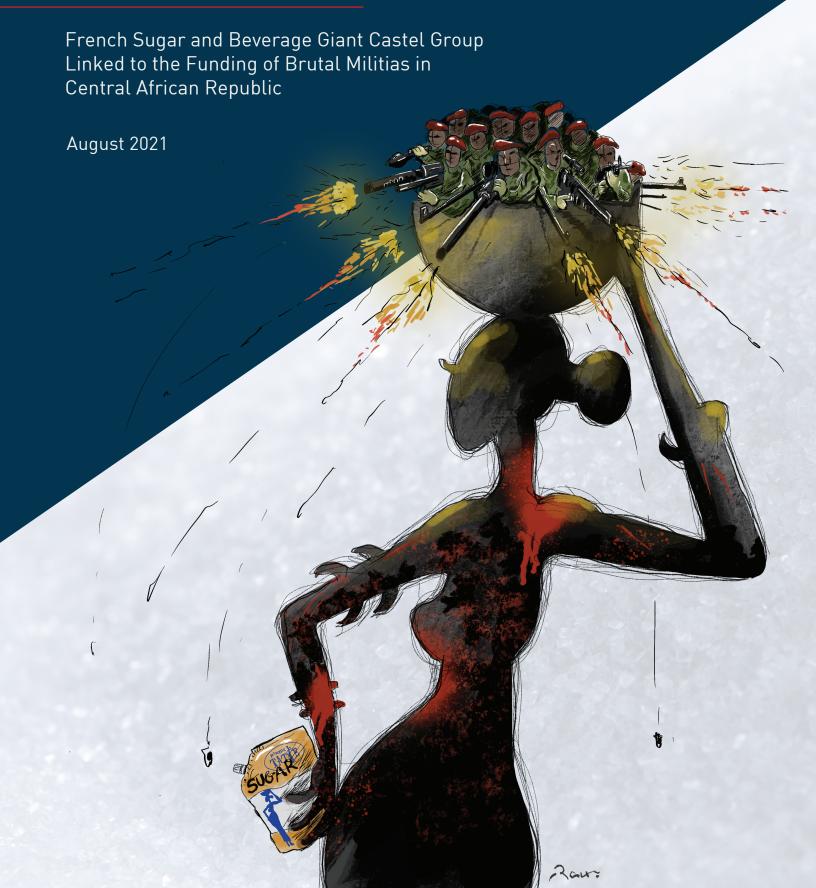
Cultivating Atrocities





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French Sugar and Beverage Giant Castel Group Linked to the Funding of Brutal Militias in Central African Republic

August 2021



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Executive Summary

French giant Castel Group is the third-largest wine producer worldwide, the second-largest brewer in Africa, and a major bottling partner for Coca-Cola in Africa. A family-owned food and beverage empire with some 240 subsidiaries in 50 countries, Castel Group generates billions in revenue each year. Behind the scenes, however, a subsidiary of Castel Group has conducted business with violent armed groups responsible for mass atrocities in order to protect its market shares.

For almost 20 years, Castel Group has been operating Sucrerie Africaine de Centrafrique (African Sugar Refinery of the Central African Republic, or SUCAF RCA) in the war-torn Central African Republic (CAR)—a country that ranked 188 out of 189 in the 2020 Human Development Index.¹ According to The Sentry's investigation, in late 2014, amid political and security upheaval, SUCAF RCA negotiated a security arrangement with an armed group, the Unité pour la paix en Centrafrique (Union for Peace in the Central African Republic, or UPC). Through this tacit agreement, UPC leaders committed to secure SUCAF RCA's factory and sugar cane fields and to ensure free movement on key roadways necessary for the provision of supplies. SUCAF RCA also secured UPC support in trying to assure the company's monopoly on sugar distribution in several prefectures, including through the forced seizure of smuggled sugar, particularly from Sudan. To protect its market, SUCAF RCA set up a sophisticated, informal system to finance the violent militias through direct and indirect cash payments, as well as through in-kind support in the form of vehicle maintenance and fuel provision. This tacit agreement between SUCAF RCA and UPC militias was active through March 2021, but its future remains uncertain due to the deployment of governmental and Russian forces in territories formerly controlled by the UPC.

Since their creation in late 2014, UPC militias, led by self-proclaimed General Ali Darassa, have committed mass killings, abductions, torture, child soldier recruitment, and sexual and gender-based violence. The United Nations (UN) has reported that the UPC militias committed mass atrocities that may constitute war crimes and crimes against humanity. In November 2018, the UPC was also responsible for a brutal attack on a camp of 18,000 displaced people in the town of Alindao that resulted in the massacre of over 112 civilians, most of them women and children. The Sentry's findings show that both UPC leader Darassa and his number two at the time of the Alindao attack, Hassan Bouba, hold responsibility for the massacre. The Sentry's investigation also indicates that the financial arrangement with SUCAF RCA has, in the meantime, primarily benefited the two men.

Members of The Sentry's investigative team traveled multiple times to CAR, Cameroon, and France over the past two years, reviewed numerous documents and other evidence, and conducted dozens of interviews with individuals with first-hand knowledge of the dynamics described in the report, including witnesses of UPC exactions, members of armed groups, and people with direct knowledge of the arrangements between SUCAF RCA and armed groups, particularly the UPC. Reporting by The Sentry shows that Castel Group's subsidiaries, SUCAF RCA and its Paris-based parent company Société d'Organisation de Management et de Développement des Industries Alimentaires et Agricoles (Food and Agricultural Industries Management and Development Company, or SOMDIAA), as well as SOMDIAA's security contractor, retired French General Bruno Dary, have been regularly informed of the egregious human rights violations committed by the UPC. The investigation found that, despite this knowledge, SUCAF RCA management still provided financial and logistical support to criminal groups, primarily but not exclusively the UPC, for more than six years, thus helping to fuel armed conflict in CAR.

Key recommendations

Hold Castel Group's subsidiaries and their managing directors accountable for potential complicity in war crimes and crimes against humanity.

- ► France's national antiterrorism prosecutor's office should launch an urgent investigation into the potential complicity and criminal liability of Castel Group' subsidiaries—primarily but not exclusively the Paris-based SOMDIAA and the CAR-based SUCAF RCA—in war crimes and crimes against humanity, as well as under France's Criminal Code. Based on the report's findings, the French prosecutor's office should also investigate the deliberate endangerment of the lives of SUCAF RCA's employees, as well as any other economic and financial offenses for the seizure and smuggling of sugar.
- ► The prosecutor's offices of the International Criminal Court (ICC) and the Central African Special Criminal Court (SCC) should undertake an urgent review of the evidence presented in this report and open an investigation into the alleged war crimes and crimes against humanity committed by the UPC and their enablers, in particular SOMDIAA and SUCAF RCA, in the context of renewed violence in CAR starting in December 2012. The ICC and the SCC should invite cooperation between international and national actors and address more directly the financial motives that fuel mass atrocities in the CAR conflict.
- ➤ The companies, holdings, and shareholders that constitute Pierre Castel's business empire should immediately disclose to relevant authorities all materials in their possession connected to this report and undertake an open and transparent investigation into the alleged links between their businesses and armed conflict in CAR. The relevant companies and their respective boards of directors should also urgently initiate a full human rights and anticorruption due diligence audit of their Central African operations through an external third party.
- Central African law enforcement authorities should launch an urgent investigation as to potential criminal liability that arises from this report, specifically in reference to war crimes and crimes against humanity perpetrated by Ali Darassa and the current Central African Minister of Livestock Hassan Bouba, and collaborate with other judicial authorities regarding the potential complicity of Castel Group's subsidiaries, SOMDIAA and SUCAF RCA, in war crimes and crimes against humanity.
- ► The UN, European Union, United States, and United Kingdom should investigate and, if appropriate, designate for sanctions the network of individuals and entities with links to Castel Group's subsidiaries highlighted in this report who are allegedly fueling mass atrocities and profiting from state capture in CAR. Authorities should seek to track assets connected to the proceeds of this activity and, where identified, forfeit them and provide the resources for development purposes.



Prelude*

Pre-massacre militia maintenance

On Tuesday, November 13, 2018, a column of 60 militiamen and three heavily armed pickup trucks arrived in front of the Sucrerie Africaine de Centrafrique (African Sugar Refinery of the Central African Republic, or SUCAF RCA) industrial site.^{2,3} For several weeks, violence had been raging in Ouaka prefecture, a region in the center of the Central African Republic (CAR) where SUCAF RCA's 12,694-acre sugar cane plantation and sugar refinery are located in Ngakobo village.^{4,5,6,7}

SUCAF RCA's staff were used to the presence of militias and to impromptu visits from heavily armed convoys passing through the sugar factory's site. The Unité pour la paix en Centrafrique (Union for Peace in the Central African Republic, or UPC) militia has been ruling the area since its creation in October 2014 and, until early 2021, had set up a military base on the company's site in Ngakobo and its headquarters in Bokolobo, a village located only 22 miles from the sugar factory. 9, 10, 11



An image showing a UPC convoy led by Ali Darassa at the Ngakobo airport, posted by Ali Darassa on Facebook on October 25, 2020. The image was taken between October 6 and 9, 2020, during a visit by Michel Djotodia to Ngakobo and Bokolobo. In the background, a UPC pickup truck mounted with a heavy weapon is visible in front of the sugar cane fields. Photo: Facebook.

On this Tuesday, the UPC commander, self-proclaimed General Ali Darassa, led the group himself and spent the night in one of the SUCAF RCA houses inhabited by the UPC militia. 12, 13 An employee of the sugar company mentions this in one of the internal security reports that were regularly transmitted to management in the Central African capital Bangui and to its parent company headquartered in Paris, the Société d'Organisation de Management et de Développement des Industries Alimentaires et Agricoles (Food and Agricultural Industries Management and Development Company, or SOMDIAA). 14, 15, 16, 17

The same thing happened the next day, with an internal report mentioning a "request from Ali Darassa to repair one of his Toyota pickup trucks." SUCAF RCA and SOM-DIAA employees could not ignore these requests. 19 Key witnesses interviewed by

^{*} Reports by The Sentry are based on interviews, documentary research, and, where relevant, financial forensic analysis. In some cases, sources speak to The Sentry on the condition that their names not be revealed out of concern for their safety or other potential retaliatory action. The Sentry establishes the authoritativeness and credibility of information derived from those interviews through independent sources, such as expert commentary, financial data, original documentation, and press reports. The Sentry endeavors to contact the persons and entities discussed in its reports and afford them an opportunity to comment and provide further information. Where responses are received, they are explicitly reflected in the report and incorporated into the analysis.

The Sentry indicated that repairs to and fuel for UPC vehicles had been provided by the sugar company's management since the end of 2014 as part of a security arrangement between SUCAF RCA and UPC leaders.^{20,21}

On November 15, the sugar company's internal security report conveyed darker news.²² UPC militiamen had attacked a camp of 18,000 displaced people and a Catholic cathedral in Alindao, a village located 59 miles from the SUCAF RCA factory.²³ Militiamen killed more than 100 people in the massacre, mostly women, children, and the elderly.^{24,25} During the attack, the UPC used rocket-propelled grenades and heavy weapons, including 12.7 mm machine guns mounted on the type of pickup trucks that SUCAF RCA regularly repaired and fueled at its Ngakobo factory.^{26,27,28,29,30,31} SOMDIAA and its security contractor Bruno Dary, a retired French army general, were informed of the abuses committed by the UPC against civilians, including attacks on villages, camps for displaced people, and churches; however, SUCAF RCA maintained its tacit agreement with the UPC.^{32,33,34,35,36}

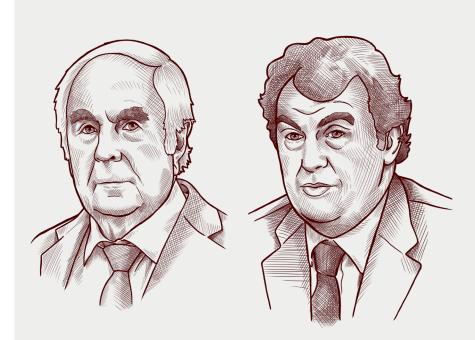


The aftermath of the attack by UPC militias against the cathedral and internally displaced persons camp in Alindao on November 15, 2018. Photo: Benoît Lallau.

The French connections

Although SUCAF RCA has been controlled by SOMDIAA since 2011, the Central African sugar company has effectively been part of French food industry giant Castel Group since its acquisition in September 2003.^{37, 38, 39} Since Castel Group's French subsidiary COPAGEF acquired up to 87% of SOMDIAA's shares in 2011, Castel Group's sugar activities have been operating under SOMDIAA's umbrella.⁴⁰ Although French

businessman Alexandre Vilgrain has remained SOMDIAA's CEO, four out of eight seats on SOMDIAA's board of directors have been allocated to Pierre Castel's close business partners as of 2021, suggesting that Castel Group has maintained a strong influence over SOMDIAA's management and its subsidiaries, including SUCAF RCA.^{41, 42, 43}



(Left) Pierre Jesus Sebastian Castel is a billionaire French businessman who founded an empire, commonly known as Castel Group, in the sugar and beverage industry.

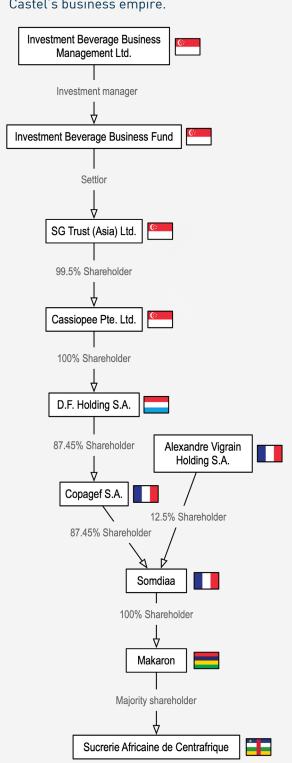
(Right) Alexandre Vilgrain is the French business executive at the head of SOMDIAA, a multinational corporation active in the food industry and part of Castel Group since 2011.

Illustrations: The Sentry.

The Sentry's investigation also found that SOMDIAA may exert effective control over SUCAF RCA's operations, which could, if confirmed, lead to the criminal liability of SOMDIAA and its board members. 44, 45, 46 For example, SUCAF RCA's security has been supervised and monitored by SOMDIAA's employees and security contractor Dary, according to a SUCAF RCA executive and SOMDIAA internal security reports reviewed by The Sentry. 47, 48, 49 Between 2015 and 2021, Vilgrain, SOMDIAA's operations and risk manager Jean Louis Liscio, and Dary traveled to CAR to meet with SUCAF RCA's management both in Bangui and in Ngakobo, according to documents reviewed by The Sentry and as confirmed by responses received from Vilgrain and Liscio to requests for comment from The Sentry. 50,51 SOMDIAA uses an internet subdomain for SUCAF RCA: employees' email addresses follow the format: name@sucafrca.somdiaa.com. 52 The CAR subsidiary also pays royalties to MAKARON Holding, a Mauritius-registered company controlled by SOM-DIAA, which allows SUCAF RCA to sell SOMDIAA's sugar brand "Princesse Tatie." 53,54 MAKARON Holding provides supplies such as spare parts, packaging, raw materials, and fertilizers to SOMDIAA's subsidiaries, including SUCAF RCA, indicating the possible effective control of SOMDIAA and Castel Group over SUCAF RCA's management. 55

SUCAF RCA Links to the Castel Group's Structure of Holdings and Companies

Bangui-based SUCAF RCA and Parisbased SOMDIAA are both part of Pierre Castel's business empire.



Pierre Castel's Sugar and Beverage Business Empire, "Castel Group"

Pierre Jesus Sebastian Castel, the elusive patriarch of the group, founded an empire in the food and beverage industry. Now living in Switzerland, Castel is the richest French tax exile and possesses the ninthlargest French fortune, according to French magazine Challenges in 2021.56 In 2016, his business empire employed more than 37,000 people through 240 subsidiaries in some 50 countries.⁵⁷ Ås of 2018, the group was the third-largest wine producer in the world and the second-largest brewer in Africa.^{58,} 59 Thanks to its bottling infrastructure and distribution network, Castel has established itself as an indispensable bottling partner of Coca-Cola in Africa while at the same time competing against the American brand with its own soft drinks.60

The African continent comprises the majority of Castel Group's activities and 80% of its revenue (€6 billion—about \$6.3 billion—in 2016).⁶¹ The after-tax profit generated by the network of companies making up Castel Group was calculated at €900 million (\$950 million) in 2016 and nearly €582 million (\$651 million) in 2019, according to financial documents reviewed by French journalist Olivier Blamangin.^{62,63}

The group is not listed on the stock market and cultivates a certain discretion; it communicates very little about its results. Its shareholders are hidden behind a Singaporebased shell company called SG Trust Asia Ltd. 64, 65, 66, 67 Castel Group's managers prefer to avoid using the name "Castel Group" because it implies a business with a financial approach, whereas they considered it a family business. 68, 69, 70 However, some of Castel Group's financial documents reviewed by The Sentry suggest that Singapore-registered holding Investment Beverage Business Fund (IBBF) is the main entity that ultimately controls the Castel business empire. 71 One of Castel Group's internal documents also says that IBBF is "commonly known as Castel Group." In this report, The Sentry uses "Castel Group" to describe all the companies and holdings controlled by Pierre Castel's family and close business circle. The Sentry tried through multiple means to contact Pierre Castel and Castel Group but did not receive a reply.

The Castel Group's Established Network of Individuals

Pierre Castel's family members and closest associates hold seats on the boards of directors of the Castel Group's main structures.

		IBBM	Cassiope PTE LTD	D.F. Holding	COPAGEF	SOMDIAA
Family Members	Jesus Sebastien Pierre Castel	Ø 0				
	Philippe Jacques Castel		Ø		0	
	Alain Castel					
	Romy Ingrid Castel		Ø		Ø	
	Michel Raymond Palu	00	$\oplus \varnothing$	0	0	0
	Jean Claude Palu		Ø			
Close Business Partners	Guy Rene Andre de Clerq	00	0	0	\oplus	Ø
	Pierre Fayaud		Ø			
	Gilles Henry Christien Martignac	00	Ø	Ø	0	Ø
	Laurence Dequatre			Ø	Ø	
	Olivier Marc		Ø		0	
	Philippe Dhamelincourt		0		Ø	Ø
	Pierre François Alec Baer	00	0			



Board membership

⊕ CEO

O Shareholder

The individuals listed do not constitute the entirety of each company's board. Those listed are individuals who have held multiple directorships within the Castel Group and have longstanding business associations with the Group such that they would be expected to have a level of awareness of and authority with respect to company activities. However, The Sentry makes no claim through listing in this chart that any individual board members or shareholders were involved in or are directly aware of the specific findings set forth in this report.

Conducting Business With Criminal Groups

When the Séléka—a coalition of armed groups from northeastern CAR, some of whose members would later create and join the UPC—began its conquest of the country in December 2012, the operations of SUCAF RCA were threatened. 73, 74, 75 Ouaka prefecture, where SUCAF RCA's plantation and refinery are located, had fallen into the hands of Séléka armed militias. 76, 77 SUCAF RCA's equipment—worth about 200 million Central African CFA francs (roughly \$402,000)—and 300 tons of sugar were seized by the Séléka, who killed two people at the factory and injured nine others. 78, 79

Séléka, Ex-Séléka, and the UPC

In December 2012, the Séléka coalition took control of several towns and villages in northern and eastern CAR. After President François Bozizé was ousted from power in March 2013, Séléka leader Michel Djotodia became president of the transition and the Séléka military leaders ruled the country for nine months. ⁸⁰ Although the Séléka coalition was formally dissolved in September 2013 following international pressures, its members came to be identified as "ex-Séléka combatants."

Between 2014 and 2015, the Séléka coalition splintered into four ex-Séléka groups: the UPC, the Front populaire pour la renaissance de la Centrafrique (Popular Front for the Rebirth of the Central African Republic, or FPRC), the Rassemblement patriotique pour le renouveau de la Centrafrique (Patriotic Rally for the Renewal of the Central African Republic, or RPRC), and the Mouvement patriotique pour la Centrafrique (CAR Patriotic Movement, or MPC).

In this report, sources and testimonies collected by The Sentry often use "Séléka" to refer to combatants who joined these four groups, particularly the UPC, which has been in control of Ouaka prefecture from the end of 2014 until 2021.

In response to the insecurity, SUCAF RCA suspended its activities in Ouaka prefecture and temporarily laid off the majority of its employees. ^{82,83} A former SUCAF RCA employee told The Sentry that in order to protect its surviving assets, the sugar company made a deal with the Séléka to pay them up to 2 million CFA francs (\$4,019) per month during the first months of the rebel occupation—a seemingly common practice among foreign entities operating in CAR at the time. ^{84,85} Payments to the Séléka were also confirmed by two SUCAF RCA executives. ⁸⁶ Three months later, the Séléka coalition overthrew General François Bozizé, who was president at the time, and took power, plunging the country into violence and chaos and perpetrating large-scale murders and assassinations, kidnappings, sexual crimes, arbitrary arrests and detentions, inhumane treatment and torture, forced recruitment of minors, armed robbery, systematic and widespread looting, and destruction of property. ^{87,88}

In the midst of this war and turmoil, Castel Group's subsidiaries, SOMDIAA and SUCAF RCA, maneuvered to maintain their longstanding advantages in CAR's sugar sector. ^{89,90,91} In 2003, Castel Group had paid 2.2 billion CFA francs (\$3.9 million in current value) to acquire the state-owned Société de gestion des sucreries centrafricaines (Central African Sugar Management Company, or SOGESCA) and, with it, a five-year contract for a monopoly position protected by the Central African state on the production and import of sugar. ^{92,93,94,95} This memorandum of understanding was renewed in 2008, and thanks to the advantageous position it afforded, the company was largely profitable between 2004 and 2012, particularly through margins on imported sugar, according to two SUCAF RCA executives interviewed by The Sentry. ^{96,97,98,39}

The Crisis in the Central African Republic and SUCAF RCA



SUCAF RCA managed to maintain its dominant position in the sugar sector throughout outbreaks of violence and the unfolding of major political events.

SUCAF RCA Central African Republic March 2003 François Bozizé comes into power after a successful coup. September 2003 i Castel Group acquires state-owned SOGESCA and a monopoly on the production and import of sugar. November 2012 The Séléka take over towns in the northern and central regions. December 2012 The Séléka invade the Ngakobo factory, and the company suspends operations temporarily. March 22, 2013 Séléka rebels claim Bangui as Bozizé flees the country. Michel Djotodia comes into power after the successful coup. **September 19, 2013** Djotodia officially dissolves the Séléka coalition. November 25, 2013 SUCAF RCA negotiates a memorandum of understanding with the Séléka regime to revive activities. December 5, 2013 France launches operation Sangaris. April 10, 2014 The United Nations Multidimensional Integrated Stabilization Mission in the Central African Republic, also known as MINUSCA, is created. September 2014 i A security arrangement is negotiated between SUCAF RCA and Ali Darassa to secure the factory, sugar cane fields, and main roads and to begin roadblocks to collect taxes on the October 2014 Bambari-Ngakobo road. The UPC is officially created with Ali Darassa as leader. February 2015 SUCAF RCA enters into a deal with Bambari trader and transporter Adef Djibrine to supply the Ngakobo factory site with fuel from Sudan. In return, Djibrine is given exclusive rights to sugar distribution in four prefectures under UPC March 2015 SUCAF RCA enters into tacit agreement with Djibrine and UPC, FPRC, and RPRC forces to create customs forces guaranteeing the ban on the entry of sugar from neighboring Sudan. Any amounts found to be smuggled in are seized by forces and taken to the Ngakobo site to be repackaged. February 2016 Faustin-Archange Touadéra wins the presidential election. All Sudanese traders have to sell sugar to Djibrine at a fixed price. The sugar is sent to the SUCAF RCA factory, repackaged, and sold under the brand "Princesse Tatie." January 2018 • The company's third memorandum of understanding expires, and the Central African State demands taxes, increases the VAT from 5% to 19%, and opens up sugar imports from 20% December 2020 to 40%. The UPC joins the CPC, a coalition of armed groups created in an effort to overthrow the Touadéra regime.

But the 2008 memorandum of understanding was coming to its end, and so on November 25, 2013, the Séléka regime renewed SUCAF RCA's agreement.¹⁰⁰ Signed by Central African government spokesperson Crépin Mboli-Goumba at the request of Michel Djotodia, the memorandum of understanding consulted by The Sentry maintains most of the advantages previously assigned to the company, namely the quasi-monopoly in the sugar sector and important tax advantages.^{101, 102}

Pierre Castel's Adventures in CAR

Described by French writer and journalist Antoine Glaser as "one of the three 'tontons flingueurs' [with Martin Bouygues and Vincent Bolloré] who can get by as easily with the Elysée Palace's political support as with their own African connections," 94-year-old Pierre Castel is a pillar of France's post-colonial system, also called Françafrique. 103 Referring to his relationship with African heads of state in an interview with Challenges magazine in 2014, the patriarch explained bluntly, "I know them all, which helps. Africans are grateful when you support them. None of them have deceived me." 104

Castel is said to have given his support to General Bozizé so that the latter could come to power in CAR in March 2003, according to Glaser. The military coup led by Bozizé, with French and Chadian support, resulted in serious abuses against civilians and paved the way for the rise of violent mercenaries in the country. Six months later, Castel Group bought the state-owned sugar company SOGESCA from the Central African state for 2.2 billion CFA francs (\$3.9 million). Six months later, Castel by a memorandum of understanding guaranteeing SUCAF RCA a national monopoly in the sugar sector, sources have suggested that the price was low. Contacted by The Sentry, Bozizé replied through apparent representatives and denied having received any support from Castel for the 2003 coup. He also denied any links between the successful coup and the sale of SOGESCA to Castel Group and added that the need for this exclusivity [in the sugar sector] arose from the request by the Central African state to SUCAF [Castel Group] to guarantee regular and stable tax revenues. That is gadvantage of the fact that Bozizé had also suspended Central African customs, Castel Group then recruited a private customs force, a company led by a French former legionary that, according to Glaser, enabled it to fight against the smugglers who threaten its sugar empire in the region.

In France, Castel can also count on some political representatives and senior military officers who are influential in Africa, including the former senator of the French abroad, Jean-Pierre Cantegrit, who has been contracted since 1995 by Castel Group as chargé of external relations, as well as retired General Dary, whom SOMDIAA hired as an independent contractor for the security of its subsidiaries, including SUCAF RCA.^{115, 116, 117} Both men are particularly important to Castel Group for their networks of influential French and African contacts.^{118, 119}

Meanwhile, violence in the country was escalating. At the end of 2013, several voices warned of a pre-genocidal situation, which prompted French President François Hollande to launch the Sangaris military operation in December 2013. 120, 121, 122 One month later, CAR entered a phase of political transition supported by Chad and France, marking the end of the Séléka coalition's reign. 123 Even though the Séléka leaders lost control of the Central African state, they maintained strong influence in the northern, eastern, and central regions, including Ouaka prefecture, where they developed a system of parallel state and efficient taxation systems. 124

A security arrangement

UPC leader Darassa has controlled Ouaka prefecture—the region that houses the SUCAF plant—since he was appointed regional commander by decree on October 28, 2013. 125, 126, 127, 128 Before joining the Séléka

coalition and later forming the UPC, Darassa had been the chief of staff of a violent criminal group active in CAR—the Front Populaire pour le Redressement (Popular Front for Recovery, or FPR)—led by Chadian rebel Baba Laddé.^{129, 130, 131} The UN had accused the FPR of committing serious abuses against the civilian population and threatening peace and security in CAR.^{132, 133} Nevertheless, French military forces and Castel Group subsidiary SUCAF RCA considered Darassa a favored security partner able to fill the void left by the absence of the state.¹³⁴

A Conflict Along Religious and Ethnic Lines

Communities in towns and cities in Séléka-controlled areas, including Ouaka prefecture, became increasingly divided following the political transition that began in January 2014. Christians were perceived as being affiliated with the anti-Balaka militias, a group of animists and Christian fighters that emerged as a consequence of the Séléka's abuses, while Muslims were seen to be affiliated with the Séléka, fueling war along religious and ethnic lines. The intercommunal violence has had a staggering impact on civilian populations, which bear the brunt of militia attacks and subsequent reprisals. The intercommunal violence has had a staggering impact on civilian populations, which bear the brunt of militia attacks and subsequent reprisals.



UPC communiqué issued from Ngakobo on December 22, 2018, and signed by Ali Darassa as military coordinator and UPC chief of staff. Photo: The Sentry.

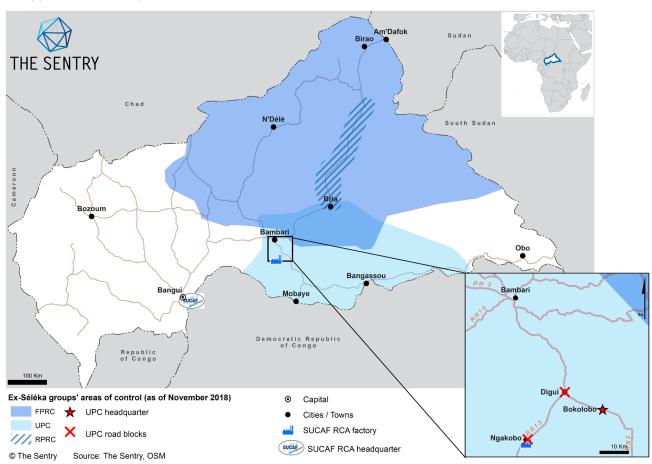
From September 2014 onward, several meetings took place between Darassa and French army officers of the Sangaris operation, several witnesses and sources with first-hand information told The Sentry. 138, 139, 140 According to the same sources, the discussions aimed at securing French interests in exchange for political, logistical, and military support to the Séléka armed militias. 141 According to a witness to these meetings, the French officers negotiated the protection of the SUCAF RCA factory to allow its reopening, as well as free movement on the strategic Bambari-Ngakobo road. 142 The goal, according to the same source, was to "neutralize the anti-Balaka and gradually entrust protection to UPC."143 The French military had attempted to secure SUCAF RCA and the Bambari-Ngakobo road by calling on the UN Multidimensional Integrated Stabilization Mission in the Central African Republic (MINUSCA).144 However, due to MINUSCA's ineffectiveness, particularly in UPC-controlled areas, the decision was made to favor a deal with Darassa. 145, 146

In late 2014, the security arrangement between the UPC and SUCAF RCA came into effect following negotiations led by SUCAF RCA management in Bangui and a representative of the sugar factory in Ngakobo, according to multiple key sources and witnesses. 147, 148 The SUCAF RCA Bangui-based director at the time had several private one-on-one meetings with Darassa with only an interpreter present. 149 The Ngakobo site manager also met with Darassa on a regular basis at the sugar factory site and at the UPC headquarters. 150, 151 The meetings were apparently easy to organize, as the UPC had set up its headquarters in Bambari before moving in 2017 to Bokolobo, which are 40 and 22 miles, respectively, from the sugar factory's site. 152 Darassa told UPC members that the SUCAF RCA site manager was only acting as an intermediary for the sugar company and that the tacit agreement was a deal between the UPC and SUCAF RCA's top management, according to three UPC members who also confirmed that the business deals between SUCAF RCA and the UPC directly benefitted Darassa's private interests. 153

"We are more or less secure. There is a tacit agreement between us and these people [the UPC] so that he [Darassa] does not cause too much disturbance on site," a SUCAF RCA executive told The Sentry in Febru-

SUCAF RCA Areas of Sugar Operations in Central and Eastern CAR

SUCAF RCA has been producing sugar from its Ngakobo factory and ensuring the distribution of its brand "Princesse Tatie" in armed group-controlled areas since the end of 2014 with the support of the company's subcontractors and ex-Séléka armed factions. Photo: The Sentry.



ary 2020, a claim that was corroborated by multiple other sources, including SUCAF RCA employees.¹⁵⁴ To this end, a detachment of 50 to 120 UPC combatants set up around the industrial site and the sugar cane plantations, three sources told The Sentry.^{155, 156} A SOMDIAA internal security report consulted by The Sentry also mentions "the arrival of about 30 Séléka on site in a BG 75 [Toyota BJ 75 pickup truck] to reinforce the existing team," followed by another reinforcement a few weeks later, bringing the total number of Séléka present on the Ngakobo site to 120 in January 2015.¹⁵⁷ Some housing owned by SUCAF RCA adjacent to the industrial site was occupied by UPC officers.^{158, 159} One of the company's internal security reports confirms this in 2021 by mentioning the existence of "Séléka jails (in the villas of the doctor and the BC [brigade commander] of the gendarmerie, which have been occupied by UPC since 2012 and belong to SUCAF)".¹⁶⁰

As part of the arrangement with SUCAF RCA, the UPC also agreed to guarantee the reopening of the Nga-kobo-Bambari road, particularly to facilitate the provision of supplies—including fuel—needed to reopen the plant. ¹⁶¹ A deal was also reached between SUCAF RCA and the UPC's enemy militias, the anti-Balaka, in an attempt to buy peace in the area surrounding the sugar company: a quota on the staffing of daily laborers was allocated to the anti-Balaka militias, provided that they were unarmed on the plantations and factory site. ^{162, 163}

Contacted by The Sentry, Vilgrain and Liscio both declared that "to our knowledge, there are no such arrangements made [with the UPC] by SUCAF RCA management and no support of any kind has been provided."¹⁶⁴ Vilgrain said that instead, "we sought to secure SUCAF RCA site with the support of foreign military forces under international mandate present in the area. Our goal was to secure people and property. Thanks to this, SUCAF RCA has encouraged the establishment of a secure IDP camp, a refuge area for the surrounding population."¹⁶⁵

However, a source present at the meetings between SUCAF RCA and the UPC said that the sugar company attempted to negotiate additional terms with Darassa in 2016. According to the witness, the company's Bangui-based director and Darassa discussed the establishment of a new system using cows to transport sugar cane from the fields to the sugar factory, which was confirmed by a SUCAF RCA executive. The same witness added that they were due to "discuss a global price for the escort, transportation and security provided by UPC," but eventually this project fell through due to operational difficulties.

A lucrative arrangement

As part of the security arrangement between the UPC and the sugar company, SUCAF RCA set up—initially with the support of French Sangaris officers—a sophisticated, informal system to finance the armed group, according to 15 people who witnessed some of the meetings and the system's implementation. As a result, some payments to the UPC allegedly do not appear directly in the company's accounts.

In light of the tacit agreement concluded between the UPC and SUCAF RCA, it is particularly difficult to estimate how much money was directly paid by SUCAF RCA representatives to UPC leaders and military detachments in Ngakobo. However, The Sentry made calculations based on first-hand testimonies that account for direct and indirect payments, in cash or in nature.



Direct cash payments

Since the end of 2014, Darassa has reportedly been paid cash—nearly 18 million CFA francs (about \$31,000) annually until early 2021—while his number two and former political coordinator, Hassan Bouba, received 12 million CFA francs (about \$20,000) yearly until 2019. Payments to Bouba have stopped since he was removed from his position as the UPC political coordinator in early 2021. Payments made by the sugar company to the two UPC leaders account for a total of nearly 150 million CFA francs (about \$258,000) over five years, as calculated by The Sentry.¹⁷¹ Three UPC members told The Sentry that the deal between the UPC and SUCAF RCA serves Darassa's personal financial interests and that he keeps his meetings with SUCAF RCA management private and confidential.¹⁷²



Aliki Mahamat Moussa Ahmed est avec Abaoubakar Aboubakar et 11 autres personnes.

20 janvier 2019 · 3

LES DEUX CERVEAUX DE L'UPC!!!

Le coordinateur militaire de l'UPC chef d'État major le général du corps d'armée Ali Darrassa & Le coordonnateur politique de l'UPC son excellence Hassan Bouba Malgré la situation sur le terrain ,malgré les manipulations des ennemis de la paix dans les deux communautés (chrétiens & musulmans) contre vous .malgré et malgré tout ses chose là vous montez toujours le morale des combattants sur le terrain !!! Longue vie a vous !!!... Afficher la suite





One of Hassan Bouba's Facebook aliases posted images of him and Ali Darassa on January 20, 2019, writing: "The two brains of the UPC!!! The military coordinator and UPC chief of staff and general Ali Darassa and the UPC political coordinator his excellency Hassan Bouba. Despite the situation in the field. despite the manipulation of the enemies of peace among the two communities (Christians and Muslims) against you, despite and despite all this, you always boost the morale of the combatants. Long life to vou..." Photo: Facebook.

Since late 2014, a UPC zone commander, commonly referred to as a "comzone," has been stationed in Ngakobo on a rotating basis.¹⁷³ This comzone allegedly received, until early 2021, an annual financial remuneration of 3.6 million CFA francs (\$6,000), while his deputy received 1.8 million (\$3,000), according to sources.¹⁷⁴ SUCAF RCA has reportedly also paid UPC combatants under the comzone's orders approximately 25,000 CFA francs (\$45) per month, along with a 110-pound bag of sugar.¹⁷⁵ Payments likely stopped in early 2021 when the UPC had to leave the area, driven away by Central African national forces and their Russian allies.

A comzone formerly deployed in Ngakobo told The Sentry that Darassa's orders are very strict concerning the company's site: the comzone has instructions to take only the payments offered by the company and to avoid any security incidents in the area, with any false steps leading to punishment by Darassa.¹⁷⁶ The existence of a UPC chain of command and military hierarchy was also confirmed by two SUCAF RCA executives and two UPC members.^{177, 178} Additionally, a SOMDIAA internal security report from December 2015 mentions the "express arrival of Ali Darassa in person aboard a land cruiser BG 75 pickup [Toyota BJ pickup truck] to remove some Séléka [UPC] elements, uncontrolled from the [SUCAF RCA] site, to bring them back to Bambari."¹⁷⁹ Despite the tacit agreement, Darassa did not end cycles of violence in the areas where the sugar company was operating, but he did enable the company to ensure the continuity of its operations.¹⁸⁰

Indirect cash payments via roadblocks

As part of the armed group's system of financing, SUCAF RCA and the UPC reportedly agreed to set up two roadblocks that allow UPC militias to collect taxes every time trucks belonging to SUCAF RCA's business partners or subcontractors pass through, sources told The Sentry.^{181,182} These two roadblocks are set up between the sugar factory and the town of Bambari, which is an obligatory point of passage to Bangui.^{183,184,185}

Details of these payments, as of February 2020, were provided by a SUCAF RCA executive interviewed by The Sentry: "UPC continues to collect taxes for Darassa in Digui," a village located at a crossroads about 12 miles from the sugar factory. When a truck comes to pick up sugar from us, we pay 40,000 CFA francs (\$67.5) in Digui, when it enters the site [at Ngakobo], there's another Séléka [UPC] roadblock at our site, there you pay 40,000 CFA francs again," the source said, adding that trucks that don't leave on the same day will pay double. 187

People living in Ouaka prefecture confirmed to The Sentry that trucks are forced to pay the UPC between 40,000 and 200,000 CFA francs (\$67.5 to \$338) at each roadblock, depending on whether they are loaded or not.^{188, 189} In order to circulate in the areas controlled by the UPC, truckers must also pay the UPC tax department a semi-annual patent fee, which has been steadily increasing since 2015.^{190, 191} In 2018, the yearly cost fell between 240,000 and 800,000 CFA francs (\$419 to \$1,397), depending on the type of truck, according to three people close to the UPC.¹⁹² As recently as August 2020, an internal security report mentions the "reinforcement of UPC security systems at the Digui intersection," confirming that this system was maintained for over six years.¹⁹³ SOMDIAA internal security reports shared with SOMDIAA employees show that SUCAF RCA's parent company could not ignore the taxation system imposed on trucks entering and leaving the industrial site.¹⁹⁴

Payments in kind

The security arrangement between SUCAF RCA and the UPC also allows Darassa to have armed militia vehicles repaired at the sugar company's garage in Ngakobo.^{195, 196} Internal company security reports confirm that UPC pickup trucks were repaired by SUCAF RCA, and sources interviewed by The Sentry confirmed that, from time to time, UPC vehicles were fueled by the company in Ngakobo.¹⁹⁷ According to a SUCAF RCA employee in Ngakobo, fuel was given to the UPC militia at first, but they were later asked to pay for fuel.^{198, 199} A former UPC comzone told The Sentry in 2020, however, that "Darassa often goes to Ngakobo and he calls the factory's General Director [DG, or SUCAF RCA site manager] asking for fuel assistance. The DG then gives orders, and the fuel is delivered to him."



SOMDIAA's security contractor, French General Bruno Dary

As the tacit agreement with the UPC protected SUCAF RCA's factory from further looting, SOMDIAA called on a retired French army general to aid in the relaunch of its subsidiary's activities. 201, 202 Dary, a former military governor of the city of Paris and the current president of the Committee of the Flame under the Arc de Triomphe, has been helping to secure the Ngakobo industrial site since 2015. 203, 204, 205 According to documents consulted by The Sentry, Dary traveled on a private jet with SOMDIAA CEO Vilgrain and SOMDIAA operations and risk manager Liscio from Brazzaville, in the Republic of Congo, to CAR in March 2015, only a few months after the tacit agreement between SUCAF RCA and the UPC was entered. 206, 207, 208 It was not Dary's sole visit to CAR. He traveled there at least four other times to visit the SUCAF RCA Bangui and Ngakobo sites: in June 2016, March and December of 2017, and May 2019, according to a SUCAF RCA employee and SOMDIAA internal reports consulted by The Sentry. 209, 210

According to a SUCAF RCA executive, Dary is particularly useful to SOMDIAA because of his "extensive address book" within the French army and MINUSCA.²¹¹For instance, in email correspondence consulted by The Sentry, the MINUSCA chief of staff provided Dary with recent information on MINUSCA's movements and operations in the UPC area in 2020.²¹² Dary can, if necessary, use connections such as these to defend the company's interests.²¹³ A company executive told The Sentry that Dary provides services and advice to SOMDIAA through



Bruno Dary is a retired Général d'armée of the French Army, a former Commandant of the French Foreign Legion, and the President of the Committee of the Flame under the Arc de Triomphe de l'Étoile, the association in charge of reviving the Flame of the Tomb of the Unknown Soldier. Dary is an independent contractor hired by SOMDIAA for the security of its subsidiaries, including SUCAF RCA. Illustration: The Sentry.

a consulting firm called Majorum.²¹⁴ Specializing in "strategic anticipation in foresight, prevention and crisis management,"²¹⁵ Majorum has appeared in the French trade register since November 2012, and Dary is its president and sole shareholder.^{216, 217, 218}

From Paris, Dary can monitor the security situation in the country very closely thanks to the SOMDIAA security reports that he and the management of SOMDIAA receive weekly.²¹⁹ The Sentry attempted to contact General Dary through multiple means but did not receive a reply. Internal security reports produced by SUCAF RCA employees and consulted by The Sentry provide detailed information on the movement of armed militias and attacks against civilians and humanitarian and UN workers, as well as on incidents on the industrial site and SUCAF RCA personnel.²²⁰ They mention certain arrangements made by SUCAF RCA in its tacit agreement with the UPC, including granting requests for vehicle repairs.²²¹ With these reports, SOMDIAA and Dary cannot deny having been made aware of the existence of some arrangements between SUCAF RCA and the UPC and of the mass atrocities committed by the armed group.²²²

Protecting Its Sugar Market at Any Cost

Security at the SUCAF RCA plant has not been the only hurdle Castel's subsidiaries needed to overcome in order to revive its activities in CAR. The sugar company had to secure its fuel supply in order to allow for the sustainable relaunch of the factory's production activities, and it needed to establish a distribution network for its sugar that could withstand security challenges. Meanwhile, to secure its sugar market, SUCAF RCA also maneuvered to combat fraudulent sugar imports—particularly from Sudan—in the east, center, and north of the country.

Subcontracting sugar distribution in militia-controlled areas

Prior to the 2013 crisis, SUCAF RCA maintained a network of sugar warehouses across the country where traders could get supplies.²²³ This allowed the company to supply wholesalers who in turn sold SUCAF RCA's sugar on the country's markets. However, with the crisis and armed groups occupying nearly 80% of CAR, this system had to be revised.²²⁴ SUCAF RCA consequently entered into new negotiations with a local trader and armed groups to facilitate the supply of fuel to the factory, as well as the distribution of sugar in regions under rebel control.

In February 2015, a meeting was organized between SUCAF RCA's Ngakobo site manager and Adef Djibrine, a Bambari trader and transporter, according to key sources interviewed by The Sentry. The people interviewed said that the connection was made by Darassa's number two, Bouba, at the request of a SUCAF RCA executive in Bangui. Following this meeting, Djibrine agreed to supply fuel from Sudan to the Ngakobo industrial site, according to six people directly involved in the deal. In exchange, SUCAF RCA management gave him exclusive rights to the sugar distribution market in four prefectures under the UPC's control or influence—Ouaka, Upper Kotto, Lower Kotto, and Mbomou. Once Djibrine accepted the offer, twice-weekly fuel deliveries began in March 2015, a source close to the subcontractor said. An internal SOMDIAA security report mentions delivery to Bambari escorted by MINUSCA of a (heavy fuel) tanker truck and a sugar truck [from] client and partner Adef Djibrine in September 2015, confirming the testimonies collected by The Sentry.

Djibrine opened several sugar warehouses in key cities, including Bambari, Bria, Ouadda, Alindao, Mobaye, Dimbi, and Bangassou.²³¹ In Bambari, the front of the sugar warehouse even bears Djibrine's name along-side that of SUCAF RCA.^{232, 233} Until 2018, "all the sugar that came out of the SUCAF factory or from elsewhere went through Adef and he was the one who [could] sell it to people," a former employee of Djibrine told The Sentry, a fact that was confirmed by a UPC member.²³⁴ As part of this partnership, Djibrine rented trucks to transport SUCAF RCA sugar and took a percentage of the sale of the bags, according to the same source.²³⁵ Djibrine also acted as a local banker for the company, which occasionally submitted cash requests to him in order to pay the factory staff and workers.^{236, 237}

SUCAF RCA's decision to call on a subcontractor allowed the company to offload responsibility for the security of the distribution of sugar once it leaves the factory, and according to a source close to French intelligence, it also allowed the UPC to keep its road taxes off the company's accounts, since transport is guaranteed by its sole subcontractor.²³⁸ Djibrine paid Darassa and Bouba substantial amounts of money—proportionate to the amount of truck traffic—according to several sources close to Djibrine.²³⁹ Two former



Adef Djibrine's commercial sign in front of his sugar warehouse in Bambari, indicating a partnership with SUCAF RCA. Photo: The Sentry.

employees of Djibrine said that "whenever Ali [Darassa] wants money, Adef gives it to him."²⁴⁰ The same happened when Bouba made requests for cash, a source close to the UPC told The Sentry.²⁴¹ According to the same UPC source, Djibrine was too afraid of the consequences and the threats he would face if he refused to honor the UPC leaders' requests for money.²⁴² The amounts could vary between 1 and 6 million CFA francs per payment, reaching several hundred million CFA francs (100 million CFA francs is equal to about \$179,000) over four years.²⁴³ In exchange, the trucks belonging to Djibrine were given special treatment: UPC combatants were ordered to collect only 1,000 CFA francs (\$1.82) per roadblock and to secure the movement of trucks, particularly against attacks from anti-Balaka.²⁴⁴

Since 2018, however, Djibrine has been in financial trouble.²⁴⁵ Not only had he become indebted to SUCAF RCA, but several sources close to Djibrine and SUCAF indicate that he had lent more than 100 million CFA francs (about \$179,000), in addition to the payments he made to secure his business, to UPC leaders who refuse to repay him.²⁴⁶ As a result, SUCAF RCA formed a new subcontracting agreement with a new local merchant in 2019.²⁴⁷ To obtain the contract with SUCAF, the merchant reportedly paid several million CFA francs (tens of thousands of dollars) to UPC leaders, thus earning the right to enter into business with the sugar company.²⁴⁸

Pierre Castel's Crusade Against Smuggled Sugar

"The cancer of Africa is the parallel market: 70% of imports are fraudulent, without licenses or customs duties," Castel said during a meeting of French and British business leaders with interests in Africa in 2005.²⁴⁹ Castel Group has built up quasi-monopolies, especially in the sugar and soft drink sectors, in some 15 French and Portuguese-speaking countries where it is actively trying to reduce smuggling.^{250, 251, 252} "We have acquired dominant positions and we have been defending them ever since," Castel acknowledged in an interview for Challenges magazine.²⁵³

The World Trade Organization reported in a 2007 country trade policy review that the monopoly on sugar imports held by SUCAF RCA, as well as heavy taxation, led to a price increase in the domestic market, which gave rise to fraudulent imports.²⁵⁴

To counter the threat of cheap smuggled sugar, Castel Group recruited a former French legionnaire, Armand Ianarelli, to fight the import of smuggled sugar with President Bozizé's approval.^{255, 256, 257, 258} Ianarelli created and managed the Société de détection des



importations frauduleuses (Fraudulent Import Detection Company, or SODIF) in 2004.^{259, 260, 261} "The MOU [memorandum of understanding] concluded between CAR's government and Ianarelli's SODIF granted the latter legal rights to effectively operate as a fraud squad within the national customs service," wrote Professor Stephen W. Smith, an Africa expert who described the vicious patterns of the concessionary politics in CAR.²⁶² The penalties imposed on fraudsters were then shared between the state, which received two thirds, and SODIF, which received the rest.^{263, 264, 265, 266} Any sugar seized was transferred to the SUCAF RCA warehouse in Bangui, re-bagged, and sold as SUCAF RCA sugar.²⁶⁷

Pierre Castel welcomed this fight against smuggled sugar using a private custom force, saying, "We asked President Bozizé to do our own policing in conjunction with the country's customs. In one month, we managed to eradicate fraud." The group's subsidiaries, sheltered from competition, can then charge very high prices, sometimes three to four times higher than those charged on the international markets, and generate profits. "269"

Criminal groups set up as parallel customs forces

With the north of the country no longer under state control, the border with Sudan became a major entry point for smuggled sugar.^{270,271} Sudanese sugar in CAR was being sold at a wholesale price 22% to 58% cheaper than SUCAF RCA's sugar, threatening the sugar company's control of the market.^{272,273}

As part of the agreement made with SUCAF RCA in February 2015, Djibrine had to ensure that no Sudanese sugar entered the market in the four prefectures covered by the contract, several sources close to Djibrine and the UPC told The Sentry.²⁷⁴ In order to convince Djibrine to accept the agreement, the SUCAF RCA site manager reportedly reassured him that the arrangements for the ban on Sudanese sugar entering CAR had already been settled with the armed groups, particularly with the UPC via Bouba, according to several sources.²⁷⁵

At first, UPC leaders Darassa and Bouba prohibited the sale of Sudanese sugar in the territories under their control and ordered the seizure of the imported stocks with the support of Djibrine and SUCAF RCA, several sources close to the UPC and Djibrine told The Sentry. SOMDIAA's internal reports confirm on two occasions seizures by armed groups or escorts to the Sudanese border. Once seized, the sugar was taken to Djibrine's warehouse in Bambari and then transferred to the Ngakobo factory, according to six witnesses. There, the seized sugar was discreetly unloaded at night before being repackaged as SUCAF RCA sugar and sold to wholesalers.

To strengthen its control of fraudulent imports, the sugar company extended this agreement to two other former Séléka armed groups positioned on the border with Sudan in the east and north. 280, 281, 282, 283 At the request of a SUCAF representative, Bouba traveled to the diamond mining town of Bria to convince some ex-Séléka military leaders, notably self-proclaimed general Zakaria Damane, to seize Sudanese sugar or bar it from entering the country, according to three sources close to Bouba, confirmed by a SOMDIAA internal security report. 284, 285 Djibrine contacted the military leader of a second ex-Séléka group, Abdoulaye Hissène, to do the same in his area of control, according to two sources close to Djibrine and two UPC members. 286

In November 2015, an internal SOMDIAA security report states that "three trucks of Sudanese sugar (40 tons) [were] seized by the forces of General Damane (former President Djotodia's right-hand man) in Ouadda Djalle [a town located 169 kilometers from Birao].... Four [other] trucks agreed to turn back to Su-



dan to avoid being seized."²⁸⁷ The internal report also specifies that these operations were carried out within the framework of a partnership agreement with Djibrine, called "our client," and that a "commission based [on the amount of the] seizure should be given to General Damane," thus suggesting that SOMDIAA and SUCAF RCA had knowledge of certain arrangements with the ex-Séléka groups.^{288, 289}

In 2015 alone, dozens of vehicles carrying up to 1,000 tons of Sudanese sugar were seized and delivered to Djibrine and SUCAF RCA, according to several people close to Djibrine and a SUCAF RCA worker interviewed by The Sentry.²⁹⁰ Once repackaged in SUCAF RCA bags under SOMDIAA's brand "Princesse Tatie," the sugar was sold for approximately 703 million CFA francs (\$1.2 million).²⁹¹ The Séléka armed groups, including the UPC, paid themselves by taking a percentage of the proceeds from the seizures.^{292, 293} A former SUCAF RCA employee confirmed this and told The Sentry that Djibrine "was paying allowances to the Séléka, and SUCAF RCA was checking by (Thuraya) phone. As soon as the compensation was paid, it was seized."²⁹⁴ According to several sources interviewed by The Sentry, Séléka leaders' financial compensations represented 50% of SUCAF RCA's profits in cash on the sales of seized Sudanese sugar.²⁹⁵

Eventually, Sudanese traders issued their own threat: if the sugar seizures were to continue, they would interrupt the supply of arms and munitions to CAR.²⁹⁶ Nourredine Adam, the leader of one ex-Séléka faction, reportedly gave instructions to stop the seizures and the ban on the entry of Sudanese sugar in his areas of control (northeastern CAR), two sources close to the UPC said, but the seizures were maintained in UPC-controlled areas.²⁹⁷ Starting in 2017, at SUCAF RCA's request, Djibrine established himself as the sole buyer of all Sudanese sugar shipments, which were sold to him at a fixed price. For instance, Djibrine would buy Sudanese sugar on behalf of SUCAF RCA for 20,000 to 25,000 CFA francs per bag, and SUCAF RCA would sell the sugar at 38,0000 CFA francs per bag, according to several sources.²⁹⁸ Fifty percent of SUCAF RCA's profits on the sales of Sudanese sugar were then shared between ex-Séléka military leaders.²⁹⁹

While this system worked relatively well from 2015 to 2017, business was more difficult for SUCAF RCA from 2018 onward. With the expiry of SUCAF RCA's third memorandum of understanding, the Central African state demanded that it pay taxes, increased the value-added tax from 5% to 19%, and dropped SUCAF RCA's share of the imports market from 80% to 60%. This resulted in an increase in the price of SUCAF RCA's sugar and a surge in cheaper smuggled sugar imports both in the west and east of the country. In January 2018, an internal SOMDIAA report stated that "the eastern market will be flooded with Sudanese sugar.... All warehouses are full of Sudanese sugar," a trend that continued through 2019. Nevertheless, in 2018 and 2019, SUCAF's new subcontractor reportedly delivered a substantial quantity of Sudanese sugar to SUCAF RCA. While SUCAF RCA's new subcontractor allegedly pays some Sudanese traders only 16,000 CFA francs (\$29) per 110-pound bag, SUCAF RCA resells the sugar at 39,000 CFA francs (\$75) per bag after repackaging it. 305,306

Even though SUCAF RCA has continuously worked to control the fraudulent import of Sudanese sugar in areas controlled by armed groups, SOMDIAA internal reports show the company's inability to completely eliminate the threat to SUCAF RCA's profits.³⁰⁷ In 2020, however, as intense fighting raged in the northeast of the country between militias and government forces, Sudanese borders were closed, and Sudanese sugar imports were brought to a virtual standstill.^{308, 309, 310, 311} To compensate for his loss of income due to the halted imports, Darassa demanded and obtained from SUCAF RCA an additional monthly bonus, bringing his financial compensation from SUCAF RCA to up to 3 million CFA francs per month (\$5,367), according to sources close to the subcontractors and UPC leadership.³¹²

Castel Group's Subsidiaries Complicit in Armed Violence?

Numerous documents, photos, videos, and audio recordings reviewed by The Sentry, as well as dozens of interviews conducted over the past two years, show that Castel Group's two subsidiaries, SUCAF RCA and SOMDIAA, as well as its contractor Dary, cannot deny having been regularly informed of the mass atrocities perpetrated by the armed groups with whom SUCAF RCA has had security and customs arrangements. Under French Law No. 2017-399, parent and ordering companies such as Castel Group are obliged to develop and execute "reasonable due diligence measures to identify risks and prevent serious violations of human rights, fundamental freedoms, the health and safety of individuals and the environment resulting from the activities of the company and those of the companies it directly or indirectly controls," including the activities of subcontractors or suppliers. Castel Group and its subsidiaries cannot ignore the numerous public reports that attribute war crimes and crimes against humanity to ex-Séléka groups, including the UPC, and to anti-Balaka groups since 2013. S15, S16, S17

A 2017 UN report found that Ouaka prefecture, where the SUCAF RCA plant is located, "was the scene of extreme violence." It attributed much of the violence to the "ex-Séléka, mainly UPC, led by Ali Darassa, and anti-Balaka fighters." The report added that "these armed groups committed killings, abductions, sexual and gender-based violence, recruited child soldiers, repeatedly attacked vulnerable displaced civilians, and destroyed civilian property." 320

In 2014, an internally displaced persons (IDP) camp was created adjacent to the SUCAF RCA factory. The site has been home to around 10,000 people, most of whom were fleeing the abuses committed by UPC militiamen, according to a SUCAF RCA employee and SOMDIAA security reports.^{321,322} A company executive interviewed by The Sentry condemned the imbalance of power between the UPC militiamen and the anti-Balaka, stating that UPC reprisals are meted out at "a ratio of 1 to 10."³²³ The anti-Balaka regularly make incursions into the bush to steal cattle and kill Fulani (an ethnic group considered to be affiliated with the UPC) before taking refuge in the IDP camp. ^{324,325} Whenever the UPC comzone is informed of these abuses, militiamen are sent to retaliate against the civilian population. ³²⁶

Attacks against civilians, humanitarians, and UN workers

Dary and SOMDIAA's employees at the Paris headquarters could not ignore these cycles of violence orchestrated by the militias that received funds from SUCAF RCA.³²⁷ The attacks have been described—and sometimes accompanied by graphic photos—in the internal security reports.³²⁸ Between 2015 and 2021, the term "attacks" appears 160 times in the internal reports consulted by The Sentry, referencing attacks or threats against civilians, humanitarian and UN personnel, and SUCAF RCA employees, as well as between militias and pro-government forces.³²⁹

In November 2015, for example, a security report mentioned an "attack on the IDP camp [in Ngakobo] by a dozen Séléka [UPC].... An IDP hut was set on fire, three grenades were thrown, a rocket was fired, and a Kalashnikov was fired.... Consequences of the Séléka [UPC] attack [were]... five dead, including two children, a 13-year-old youth and two men among the civilians and four seriously injured."³³⁰

Internal security reports confirm that UPC leader Darassa is directly responsible for mass atrocities committed by the UPC combatants.³³¹ In late 2014, an internal report mentions "the arrival of a Séléka team sent by General Ali Darass to relieve the Séléka [UPC] of Goya [who] have committed crimes in Goya. As a reminder, 14 people were shot by... a Séléka [UPC] municipal councilor from Goya. The mayor of this locality... a Séléka [UPC] colonel... sows terror in Goya."³³² Another report sent four years later indicated that "Ali Darassa personally raided the Kolo [gold] site (Mingala) today with about 100 elements. A massacre was organized against the inhabitants who refused to submit to UPC demands. Report expected."³³³

The Alindao IDP Camp Massacre: A Crime Against Humanity

On the morning of November 15, 2018, hundreds of UPC assailants surrounded the Catholic cathedral and IDP camp in Alindao, a small town located 59 miles away from SUCAF RCA's industrial site. 334, 335, 336 The orders were clear: destroy the IDP site and the cathedral where nearly 20,000 civilians, mostly Christians, lived. 337 Both locations were considered by the UPC to be sanctuaries for their local enemy, the anti-Balaka militias. 338, 339

More than 112 civilians, including 44 women, 19 children, and three clergymen, were killed that day, according to the UN. 340 The victims with whom The Sentry spoke reported a much heavier toll. 341



The aftermath of the attack by UPC militias against the cathedral and internally displaced persons camp in Alindao on November 15, 2018. Photo: Benoît Lallau.

A UN investigation concluded that "[t]he modus operandi of the UPC and its methods of combat amounted to systematic reprisal attacks against civilians from the Christian community including both IDPs and Catholic church leaders." The UN report also indicated that the abuses committed may qualify as war crimes and crimes against humanity. 343

"Not even a chicken was supposed to get out alive," said a UPC officer who participated in the attack and confirmed to The Sentry that the order had come from the UPC political coordinator. A dozen testimonies collected by The Sentry between 2019 and 2020 from individuals directly involved—as executioners, witnesses, or victims—reveal that the order to raze the IDP camp and cathedral was given by Bouba from the Central African capital Bangui, while Darassa—who was at SUCAF RCA's site in Ngakobo the day before the attack, repairing his pickup truck—did not give any counter-orders to stop the killings.

The use of pickups and heavy weapons

The company's internal reports also show that SOMDIAA's headquarters and SUCAF RCA's Bangui office were on notice that direct and indirect payments to UPC leaders likely went toward the maintenance and purchase of vehicles and fuel and the supply of weapons and ammunition used against civilians, SUCAF RCA personnel, and UN and humanitarian workers. Additionally, internal security reports mention regular convoys of pickup trucks mounted with 12.7 mm machine guns passing through or stopping at the SUCAF RCA Ngakobo site, which suggests that the two Castel Group subsidiaries could not ignore that these vehicles were being used for military operations.³⁴⁷

Between 2015 and 2021, SOMDIAA's internal security reports mention at least 58 times the passage through SUCAF RCA's Ngakobo site of dozens of militiamen aboard UPC pickup trucks equipped with heavy weapons, including large-caliber machine guns (12.7 mm and 14.5 mm), the likes of which have been used in UPC attacks and military operations, as in Alindao in 2018. 348, 349, 350, 351 An internal security report from April 2018 mentions the "arrival at 8 p.m. of 10 Séléka [UPC] motorbikes alongside two pickup trucks including one equipped with 12.7 mm. Onboard the pickup truck 12.7 mm Ali Darassa."352



An image showing a UPC convoy led by Ali Darassa at the Ngakobo airport, posted by Ali Darassa on Facebook on October 25, 2020. The image was taken between October 6 and 9, 2020, during a visit by Michel Djotodia to Ngakobo and Bokolobo. In the background, a UPC pickup truck mounted with a heavy weapon is visible in front of the sugar cane fields. Photo: Facebook.

In May 2020, an internal report mentions that Darassa bought a new BG 75 pickup truck (Toyota BJ) during a stay in Bangui and that he had just bought six used pickup trucks from Sudan. A month later, a report states that "UPC general Sengue Sengue... brought back from Bria the endowment of arms and ammunition bough by Darassa in Sudan. PANs and 12.7 [heavy weapons] are in sufficient quantity in Bokolobo at the moment. Darassa has stocked up enough weapons from the DRC [Democratic Republic of Congo] and South Sudan this month." Around the same time, a report indicates that Darassa was heading to Bokolobo "escorted by 5 Land cruiser BG 85 [Toyota BJ pickup truck] equipped with 14.5 mm guns, and more than 80 Séléka [UPC] elements." As recently as February 15, 2021, an internal report mentions the "the departure at 1 am of 3 pickup trucks land cruiser BG 85 [Toyota BJ pickup truck] equipped with 12.7" from the SUCAF RCA site.

Although Castel Group' subsidiaries—SOMDIAA and SUCAF RCA—were aware of the use of UPC pickup trucks in the perpetration of mass atrocities, they approved vehicle repairs for the militia group.³⁵⁷ According to several UPC sources, the vehicle repairs mainly consisted of welding, tire replacements, and fueling.³⁵⁸ In January 2015, an internal security report describes a mechanic employed at the SUCAF RCA plant in Ngakobo "who, on the instructions of the management of the site, repaired the pickup truck of the Ngakobo comzone."³⁵⁹ In December 2020, while the UPC was threatening to overthrow the central regime in Bangui alongside other armed groups that together formed the Coalition des patriotes pour le changement (Coalition of Patriots for the Change, or CPC), an internal company report mentions headlight repairs on two UPC BG

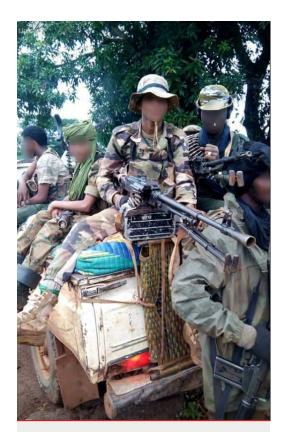


Image posted by Hassan Bouba's alias Aliki Mahamat Moussa Ahmed showing UPC militias on a UPC pickup truck with heavy weapons. The image was posted on November 11, 2018, just four days before the attack in Alindao. Photo: Facebook.

80 pickups (Toyota BJ) and Darassa's command pickup. 360, 361 Two months later, another report mentions the 8:30 pm arrival of Darassa at the SUCAF RCA site with four pickup trucks and heavily armed militiamen: "they have a hollow tire from one of the BG 85 pickups [Toyota BJ] and, request the intervention of our pneumatics." The report mentions Darassa's return to Bambari with his escort three hours later. 363 Even though the internal security reports do not confirm the provision of fuel to UPC vehicles, several sources interviewed by The Sentry, including former UPC comzones, confirmed that the company has been regularly supplying fuel for UPC vehicles, as well as for their reserves. 364

SOMDIAA's headquarters and Bangui office have also been informed several times of the arrival of new pickup trucks and weapons paid for by Darassa. A December 2018 report indicates that the "number of Séléka [UPC] on site has increased with some new weapons (Kalashnikov)," and 10 days later, another report mentions that "Ali Darass has received two new and equipped BG 80 [Toyota BJ pickup truck] in Bokolobo."

Another security report dated nine months earlier describes "the presence in Bokolobo of Sudanese militiamen with 5 pick-up trucks land cruiser BG 80 [Toyota BJ pickup truck] with 7 boxes of ammunitions and a SAM7 for sale to Ali Darass.... The latter reportedly bought 3 drums of ammunitions."³⁶⁷ The next day, an internal report indicated that "19 people (mostly civilians) were killed... following clashes between AB [anti-Balaka] and Séléka (UPC)."³⁶⁸ The report's writer suggests that the increase in violence in the region was "predictable" based on the recent "arrival of ammunition from Sudan."³⁶⁹ In 2019, a report indicates that "for the past three days, in waves of three

motorcycles per day, UPC Séléka elements have been transporting ammunitions in packages from Bria to the Bokolobo headquarter where the warlord Ali Darassa resides. These rotations continue to this day."³⁷⁰

Threats against SUCAF RCA's workers and employees

Contacted by The Sentry, Vilgrain said that "as soon as we became aware of the incidents likely to be committed against the personnel of the company or other people on the periphery of the site, we reacted and initiated measures,"371 which can be seen in the support SUCAF RCA sought from foreign military forces under international mandate present in the Ngakobo area. Vilgrain also added that "our goal was to secure people and property."372

According to The Sentry's investigation, however, and despite the security arrangement between SUCAF RCA and the UPC, the sugar company failed to fully protect its staff from cycles of violence.³⁷³ Throughout the years, SOMDIAA's internal security reports document numerous threats and acts of violence perpetrated against its staff by armed groups, including targeted killings, torture, enforced disappearances, death threats, intimidation, looting, and forced tax collection by the UPC.³⁷⁴

In February 2015, an internal security report mentions a UPC attack on the factory with a rocket that resulted in three employees being wounded and evacuated to Bambari hospital.³⁷⁵ At the same time, a security report mentions the murders of a SUCAF RCA welder and a field maintenance worker by the Séléka—the UPC—in Ngakobo and the arrival of 2,000 people at the SUCAF RCA factory who were fleeing the workers' village for fear of Séléka abuses.³⁷⁶ The security report mentions that several months later, four SUCAF RCA personnel were shot at by a Séléka (UPC) member who remained on the SUCAF RCA's site; this happened at a time when half of the people living in the SUCAF RCA workers' village had left their residences to return to the IDP camp because of UPC movements, intimidations, and threats in the village.³⁷⁷ In 2018, an internal report indicates that a SUCAF RCA worker "was arrested by the Séléka [UPC] for a family matter. The worker was subjected to abuse and torture."³⁷⁸

In 2020, a report informed employees at the Paris headquarters and Dary of the "exhumation of a skull and bones in the [SUCAF RCA] workers' village, not far from the police station, next to the workers' houses occupied by the Séléka from 2013 to the end of 2019."³⁷⁹ A year later, another report refers to allegations of "an existing mass grave inside the UPC base at the SUCAF RCA site where the bodies of the wounded and prisoners who died in the [UPC] Séléka jail are buried."³⁸⁰

Recommendations

Despite a dire security situation in one of the least developed countries in the world, SUCAF RCA and SOMDIAA have contributed to fueling mass atrocities by providing financial and logistical support to criminal groups, including the UPC, while failing to fully ensure the security of their employees from late 2014 to today.^{381,382} As a result of this investigation, The Sentry's recommendations are as follows:

Castel Group

Cease and disclose. This report raises serious concerns over the operation of Castel Group and its subsidiaries and exposes potential violations of French, Central African, and international law. Castel Group should immediately ensure its subsidiaries cease all support to armed groups. It should disclose to relevant authorities all materials in its possession connected to this report and undertake an open and transparent investigation into the alleged links between its businesses and conflict in CAR. Castel Group should also urgently initiate a full human rights and anti-corruption due diligence audit of its Central African operations through an external third party.

France

Investigate potential wrongdoing. France's national anti-terrorism prosecutor's office should launch an urgent investigation into the potential complicity and criminal liability of SOMDIAA and SUCAF RCA in war crimes and crimes against humanity under France's Criminal Code. It should also consider investigating and, if confirmed to be appropriate after such investigations, potentially issuing charges for the participation in a criminal association with the aim of committing a crime against humanity, the deliberate endangerment of the lives of SUCAF RCA's employees, and other economic and financial offenses related to the seizure and smuggling of sugar. Judicial authorities should ensure that crime victim compensation reaches SUCAF RCA's workers and employees, as well as the victims of UPC abuses committed between late 2014 and early 2021, a period during which the UPC militia benefited from the financial and logistical support of Castel Group's subsidiaries.

Engage Castel Group on international guidelines. France should engage with Castel Group to ensure that it and its subsidiaries are complying with the Organisation for Economic Co-operation and Development (OECD) Guidelines for Multinational Enterprises and OECD-Food and Agriculture Organization of the UN (FAO) Guidance for Responsible Agricultural Supply Chains. In particular, the French National Contact Point (NCP) should actively engage with this report and take appropriate actions. French authorities should also engage with Castel Group and its subsidiaries to ensure that they are acting pursuant to France's National Plan for the Implementation of the UN Guiding Principles on Business and Human Rights.

Central African government

Investigate potential wrongdoing. Central African law enforcement authorities should launch an urgent investigation as to potential criminal liability that arises from this report, specifically in reference to war crimes and crimes against humanity perpetrated by Ali Darassa and the current Central African Minister



of Livestock, Hassan Bouba, and cooperate with other judicial authorities to find out whether SUCAF RCA and SOMDIAA and any other Castel Group subsidiaries were complicit in war crimes and crimes against humanity. Precautionary measures should be adopted to immediately remove Bouba from his position in the current government.

Bring about governance and fight poverty, food insecurity, and corruption. The Central African government should review the terms of the agreement between the Central African state and Castel Group. It should ensure that any agreements signed between the Central African state and external or private partners in the agricultural and livestock sectors are submitted to an independent commission mandated to analyze the benefits for Central African consumers and the Central African state. The Central African government should bring about governance in the agricultural sector, particularly related to essential food products such as sugar. National authorities should ensure that the prices of staple food products are capped by providing subsidies, if necessary. National authorities should also develop a policy to support local food production and combat speculation on food products to fight poverty and food insecurity.

United Nations, United States, United Kingdom, European Union, and African Union

Deploy sanctions using existing authorities. The UN, EU, US, and UK should investigate and, if appropriate, designate for sanctions the network of individuals and entities highlighted in this report who have links to Castel Group and are fueling mass atrocities. The UN Security Council's CAR sanctions regime; the EU, US, and UK's CAR country sanctions programs; the EU's new Global Human Rights Sanctions Regime; the US Global Magnitsky sanctions program; and the UK's Global Human Rights sanctions program each provide the scope to sanction the UPC, UPC leader Ali Darassa, and former UPC political coordinator Hassan Bouba, as well as SUCAF RCA and SOMDIAA officials supporting the UPC militia, which is engaged in serious human rights abuses. The AU's Peace and Security Council should also play a leading role by investigating and targeting perpetrators under the CAR sanctions program.

The International Criminal Court

Investigate potential wrongdoings and cooperate with other judicial authorities. The Office of the Prosecutor should undertake an urgent review of the evidence presented in this report under the auspices of its Central African Republic II investigation into alleged war crimes and crimes against humanity committed in the context of renewed violence in CAR starting in 2012. In particular, it should consider the potential liability of SUCAF RCA, SOMDIAA, and Castel Group officials in assisting the war crimes and crimes against humanity reportedly committed by the UPC militia within its jurisdiction. The Office of the Prosecutor should invite cooperation between international and national actors to address more effectively the financial motives that drive violence in CAR.

Central African Special Criminal Court

Investigate potential wrongdoing. The Central African Special Criminal Court (Court Pénale Spéciale - République centrafricaine) should review the evidence presented in this report, particularly as relates to its recent investigations into UPC activities and the potential liability of SUCAF RCA, SOMDIAA, and Castel Group officials in assisting, encouraging, or contributing in any other way to the alleged war crimes and crimes against humanity within the scope of the Special Court's jurisdiction.



Banks and financial institutions

Conduct due diligence. Banks and financial institutions in CAR and elsewhere should investigate potential illicit financial activities by Castel Group's subsidiaries and collaborate with relevant financial and law enforcement authorities. Financial institutions should take steps to identify accounts held or beneficially owned by individuals or entities in Central African business sectors, undertake increased screening and enhanced ongoing monitoring, and review transactions to identify, investigate, and report potentially suspicious financial activity to relevant national authorities.

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- The Sentry interviews with two sources close to Djibrine and a source close to the UPC who spoke on condition of anonymity, 2020.
- The Sentry interviews with six sources, including a former SUCAF RCA employee, UPC members, and SUCAF RCA subcontractors' employees who spoke on condition of anonymity, 2020.
- 277 SOMDIAA Internal Security Reports dated December 9 and 12, 2015, consulted by The Sentry in 2020.
- The Sentry interviews with six people, including former SUCAF RCA employees, UPC members, SUCAF RCA subcontractors' employees, and a Sudanese merchant who spoke on condition of anonymity, 2020.
- The Sentry interviews with seven people, including SUCAF employees, a UPC member, SUCAF RCA subcontractors' employees, and a Sudanese merchant who spoke on condition of anonymity, 2020.
- These two groups were the Front populaire pour la renaissance de la Centrafrique (Popular Front for the Rebirth of Central African Republic, or FPRC), led by Nourredine Adam and Abdoulaye Hissène, and the Rassemblement patriotique pour le renouveau de la Centrafrique (Patriotic Rally for the Renewal of the Central African Republic, or RPRC), led by Herbert Diono Gontran Ahaba and Zakaria Damane.
- 281 See note 9.
- 282 The Sentry interviews with several sources with direct knowledge of the dynamics described, 2020.
- SOMDIAA Internal Security Report dated December 12, 2015, consulted by The Sentry in 2020.
- The Sentry interviews with three sources, including a SUCAF subcontractor's employee and sources close to the UPC who spoke on condition of anonymity, 2020.
- 285 SOMDIAA Internal Security Report dated December 12, 2015, consulted by The Sentry in 2020.
- The Sentry interviews with several sources with direct knowledge of the dynamics described, including UPC members and SUCAF subcontractors' employees, 2020.
- SOMDIAA Internal Security Reports, consulted by the Sentry in 2020.
- 288 SOMDIAA Internal Security Report dated November 12, 2015, consulted by the Sentry in 2020.
- SOMDIAA internal security reports indicate that they were submitted to some SUCAF RCA and SOMDIAA employees on a weekly basis from November 2014 until today.



- The Sentry interviews with several sources with direct knowledge of the dynamics described, including SUCAF RCA employees, a UPC member, and SUCAF subcontractors' employees who spoke on condition of anonymity, 2020.
- The Sentry's investigation found that the average price between 2012 and 2020 was 37,000 CFA francs (\$59) per 110-pound bag.
- The Sentry interviews with several sources, including a SUCAF RCA worker, UPC members, and people who work in the sugar sector in Ouaka prefecture with direct knowledge of the dynamics described who spoke on condition of anonymity, 2020.
- 293 SOMDIAA Internal Security report dated December 12, 2015, consulted by The Sentry in 2020.
- The Sentry interview with a former SUCAF RCA employee who spoke on condition of anonymity, 2020.
- The Sentry interviews with several SUCAF RCA subcontractors' employees and a UPC member who spoke on condition of anonymity, 2020.
- 296 The Sentry interviews with two sources close to the UPC who spoke on condition of anonymity, 2020.
- The Sentry interviews with two sources close to the UPC and to Nourredine Adam's armed group, the FPRC, who spoke on condition of anonymity, 2020.
- The Sentry interviews with several sources, including UPC members, SUCAF RCA subcontractors' employees, and a SUCAF employee, 2020.
- The Sentry interviews with four sources close to a SUCAF RCA subcontractor who spoke on condition of anonymity, 2020.
- 300 See note 273.
- 301 See note 273.
- 302 The Sentry interview with a SUCAF executive who spoke on condition of anonymity, 2020.
- 303 SOMDIAA Internal Security Reports, consulted by The Sentry in 2020.
- The Sentry interviews with a source who works in the sugar sector with direct knowledge of the dynamic described and a Sudanese transporter who spoke on condition of anonymity, 2020.
- The Sentry interviews with two sources who work in the sugar sector with direct knowledge of the dynamic described who spoke on condition of anonymity, 2020.
- 306 See note 273.
- 307 SOMDIAA Internal Security Reports, consulted by The Sentry in 2020.
- Radio France Internationale, "Centrafrique : la Minusca aux prises avec le FPRC à Birao" (Central African Republic: MINUSCA Battles FPRC in Birao), February 17, 2020, available at: https://www.rfi.fr/fr/afrique/20200216-centrafrique-minusca-prises-fprc-birao
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- The Sentry interviews with three sources with direct knowledge of the dynamics described who spoke on condition of anonymity, 2020.
- The Sentry interviews with five sources, including a SUCAF RCA employee and sources who work in the sugar sector with direct knowledge of the dynamics described and who spoke on condition of anonymity, 2020.
- 313 SOMDIAA Internal Security Reports, consulted by The Sentry in 2020.
- French Republic, "Journal officiel électronique authentifié no 0074 du 28 mars 2017" (Authenticated Electronic Journal No. 0074 of March 28, 2017), available at: <a href="https://www.legifrance.gouv.fr/download/pdf?id=9aawcYcwvkntYs2UUCMWL4iX erjixoTD Jy3AVXRFk="https://www.legifrance.gouv.fr/download/pdf?id=9aawcYcwvkntYs2UUCMWL4iX erjixoTD Jy3AVXRFk="https://www.legifrance.gouv.fr/down
- 315 See note 34.
- 316 See note 24.
- 317 United Nations Security Council, "Reports," available at: https://www.un.org/securitycouncil/sanctions/2127/panel-of-



- experts/reports (last accessed March 8, 2021).
- 318 See note 34, p. 189.
- 319 See note 34, p. 189.
- 320 See note 34.
- The Sentry interview with a SUCAF executive who spoke on condition of anonymity, 2020.
- 322 SOMDIAA Internal Security Reports dated February 4, 2015; May 12, 2016; and November 9, 2016, consulted by The Sentry in 2020.
- 323 The Sentry interview with a SUCAF executive who spoke on condition of anonymity, 2020.
- The Sentry interview with a SUCAF executive who spoke on condition of anonymity, 2020.
- 325 SOMDIAA internal security reports document regular incidents between UPC combatants and anti-Balaka militias and reprisals against civilians throughout the years from 2014 to 2021. SOMDIAA Internal Security Reports consulted by The Sentry in 2020 and 2021.
- 326 SOMDIAA Internal Security Reports, consulted by The Sentry in 2020 and 2021.
- 327 Email exchanges between SUCAF employees and SOMDIAA employees, consulted by The Sentry in 2020 and 2021.
- 328 SOMDIAA Internal Security Reports dated January 18, May 16, August 1, December 3-4, and December 11, 2015, consulted by The Sentry in 2020 and 2021.
- 329 SOMDIAA Internal Security Reports, consulted by The Sentry in 2020 and 2021.
- 330 SOMDIAA Internal Security Reports, consulted by The Sentry in 2020.
- 331 SOMDIAA Internal Security Reports, consulted by The Sentry in 2020 and 2021.
- 332 SOMDIAA Internal Security Report dated December 18, 2014, consulted by The Sentry in 2020.
- 333 SOMDIAA Internal Security Report dated September 5, 2019, consulted by The Sentry in 2020.
- 334 See note 24.
- 335 See note 23.
- The Sentry interviews with several sources, including UPC members, victims, and witnesses of the attack who spoke on condition of anonymity, 2019 and 2020.
- The Sentry interviews with sources close to the UPC, victims, and witnesses who spoke on conditions of anonymity, 2019 and 2020.
- 338 See note 24.
- 339 See note 23.
- 340 See note 24, pp. 1, 6.
- The Sentry interviews with several victims and witnesses of the attack against the displaced camp of Alindao who spoke on condition of anonymity, 2020.
- 342 See note 24, p. 9.
- 343 See note 24, p. 8
- The Sentry interview with a UPC commander who spoke on condition of anonymity, 2020.
- The Sentry interviews with numerous witnesses and UPC sources close to Darassa and Bouba who spoke on condition of anonymity, 2019 and 2020.
- 346 SOMDIAA Internal Security Reports, consulted by The Sentry in 2020 and 2021.
- 347 SOMDIAA Internal Security Reports from 2014 to 2021, consulted by The Sentry in 2020 and 2021.
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- 355 SOMDIAA Internal Security Report dated August 12, 2020, consulted by The Sentry in 2020.
- 356 SOMDIAA Internal Security Report dated February 15, 2021, consulted by The Sentry in 2020.
- 357 SOMDIAA Internal Security Reports and email exchange between SUCAF RCA and SOMDIAA employees, consulted by The Sentry in 2020 and 2021.
- The Sentry interviews with three sources, including a SUCAF executive, a UPC commander who was formerly comzone in Ngakobo, and a UPC member who spoke on condition of anonymity, 2020.
- 359 SOMDIAA Internal Security Reports, consulted by the Sentry in 2020.
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- 362 SOMDIAA Internal Security Reports, consulted by The Sentry in 2021.
- 363 SOMDIAA Internal Security Reports, consulted by The Sentry in 2021.
- The Sentry interviews with several sources, including UPC members and SUCAF employees who spoke on condition of anonymity, 2020.
- 365 SOMDIAA Internal Security Reports dated March 2 and 18, 2018; April 16, 2018; December 4 and 14, 2018; July 17, 2019; May 15, 2020; and January 14, 2021, consulted by The Sentry in 2020 and 2021.
- 366 SOMDIAA Internal Security Reports dated December 4 and 14, 2018, consulted by The Sentry in 2020.
- 367 SOMDIAA Internal Security Report dated March 18, 2018, consulted by The Sentry in 2020.
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- 371 Alexandre Vilgrain's response to The Sentry, July 8, 2021.
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- 373 SOMDIAA Internal Security Reports dated March 2, 2018; April 16, 2018; March 19, 2018; December 4 and 14, 2018; July 17, 2019; May 15, 2020; and January 14, 2021, consulted by The Sentry in 2020 and 2021.
- 374 SOMDIAA Internal Security Reports from November 2014 to April 2021, consulted by The Sentry in 2020 and 2021.
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