

Forum: International Court of Justice (ICJ)

Issue: *Request relating to the Return of Property Confiscated in Criminal Proceedings*
(Equatorial Guinea v. France)

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Introduction

Teodoro Nguema Obiang, Vice-President of Equatorial Guinea and son of Equatorial Guinea's president, Teodoro Obiang Mangué, was charged on the 27th of October, 2017 by a Paris criminal court on suspicion of money laundering and embezzlement of more than \$100 million, without being able to provide compelling evidence to reinforce

the origin of his fortune. It was said that he plundered the money from oil-rich Equatorial Guinea to fund a pricey and lavish lifestyle in Paris. Proceedings to uncover illegal activities of Equatorial Guinea's vice president were initiated by Transparency International France with the Paris public prosecutor in 2008. Along with his charges in 2016 was the seizure of a property in France- a mansion at 42, avenue Foch in Paris. This confiscation of property triggered Equatorial Guinea's proceedings towards France, seeking the involvement of the ICJ court to sort out conflicting interpretations of legal documents.

Equatorial Guinea relied on article 4, more specifically article 4(1), of the organized crime convention which stated that "Parties shall carry out their obligations under this Convention in a manner consistent with the principles of sovereign equality and integrity of States and that of non-intervention in the domestic affairs of other States" (UNODC), as well as article 22 of the Vienna convention diplomatic relations, which states that 'diplomatic premises are inviolable' (legal.un.org). These documents, in result, supported Equatorial Guinea's claims that the seized property was allegedly part of its diplomatic mission, not the personal property of Vice President Teodoro Nguema Obiang, as alleged by French investigators.

The case involved the question of whether Mr. Mague's political immunity from criminal jurisdiction should prevent French authorities from pursuing him, as well as the status of the building in Paris that Equatorial Guinea claims is part of its embassy. This case highlights the issue of corruption and money laundering in countries like Equatorial Guinea's governmental system, questioning political figures' immunity when faced with political charges.

The Obiang family, before the 2016 charges by the French government, had long been accused of corruption, money laundering, and misuse of state funds, living lavish lives as mentioned before in the accusation of Equatorial Guinea's vice presidents' suspicious economic activities. Following this rocky background of illegal activities, France rejected the claim that the mansion was to be protected under international diplomatic law.

The ICJ was tasked with resolving the dispute, as Equatorial Guinea sought its participation on June 13, 2016, to solve the conflict. Considering the application of international law, including the Vienna Convention on Diplomatic Relations, they are in charge of assessing whether the proceedings possess jurisdiction. ICJ is also in charge of examining the legality of France's actions based on International law, more specifically, if at the time of the seizure the property was recognized as a diplomatic premises. The involvement of the ICJ in this legal conflict between France and Equatorial Guinea raises questions about how diplomatic protections can sometimes be misused and about balancing state sovereignty with the need to fight corruption.



Equatorial Guinea Mansion at 42, avenue Foch in Paris (telegraph.co.uk)

Case in Context

The International Court of Justice (ICJ) case regarding the Request relating to the Return of Property Confiscated in Criminal Proceedings (Equatorial Guinea v. France). It is based on the recovery of assets under laws provided by the UN Convention against corruption and diplomatic immunity controversy under the Vienna Convention on Diplomatic Relations definition.

Teodoro Nguema Obiang Mangue, Vice-President of Equatorial Guinea in 2010, faced criminal proceedings launched by French authorities under suspicion of corruption and money embezzlement. It was said that Obiang laundered \$175 million, which was embezzled from Equatorial Guinea's state funds. The criminal proceedings involved a seizure of many of Obiang's assets purchased through illicit funds, including a luxury Parisian mansion at 42 Avenue Foch, building which Equatorial Guinea claimed to be part of a diplomatic mission, which under the law of the Vienna Convention invoked

immunity to the building and therefore could not be seized. However, this claim was dismissed in 2020 as the ICJ ruled that France, home of the building, did not consent to its diplomatic designation, therefore revoking immunity and allowing confiscation. After this ruling, in 2022, French officials announced plans to auction the building, leading Equatorial Guinea to file a new ICJ case demanding asset restitution under UNCAC article 57.

This case began when French authorities convicted Obiang of laundering and embezzling public funds from Equatorial New Guinea. French security officials confiscated multiple assets, the most important of which was the luxury Paris building, this assets where confiscated under the claims of illicit money usage, as a result Equatorial Guinea argued that this property was part of a diplomatic mission and therefore immune, which meant that the mansion should be restored under the UN Convention Against Corruption UNCAC, This claim was the cause of a legal battle at the ICJ which raised important questions about diplomatic immunity, corruption and asset recovery.

The Equatorial Guinea vs France case ratified key elements of diplomatic immunity and therefore asset recovery under international law, by finding a claim by the ICJ stating that diplomatic premises require approval from the host state to be considered as such, this creates a clear barrier to states and individuals who seek to abuse diplomatic status to shield illicit assets such as Obiang. Additionally, the case showed the importance of the UNCAC as a bridge for international cooperation in the recovery of illegal assets, making a statement showing the need for transparency and clearance on legal conditions before asset return. This case has contributed to strengthening global law and fighting against corruption and money laundering.

On a different note, this case has led to continuous tensions between the two main parties involved, with this dispute staying unresolved after many years. This tension is motivated by the actions of both parties, starting with the failure of Equatorial Guinea to meet UNCAC's requirements for asset return, resulting in a legal roadblock that delayed this asset return. Additionally we see a sad image of the Equatorial Guinea situation highlighted by French party refusal on asset return and continuous claims of concerns about systemic corruption and government issues in Equatorial Guinea, which bring a certain doubt on the accessibility to public money and systems enjoyed by the country's citizens, showing therefore the overall harm caused by corruption.

Equatorial Guinea is the first of the 2 most related and therefore most affected parties, as the government sought to protect the Paris property with the claim of diplomatic goals and vision endorsing the immunity for seizure. However, the final ICJ ruling against this claim limited the ability of the government to protect these assets and therefore gave in to the claim of corruption and illicit funding. Additionally, it's Vice President, Teodoro Nguema Obiang, whose assets were seized, was personally affected as he lost properties and faced legal sanction, alongside time in prison and fines for corruption-related offenses

France is the second most related and affected party because, as the host state, France was obligated to find a balance between its criminal interests and the investigation of the alleged corruption and money laundering, with the obligations they have under diplomatic law. In the end, the ICJ's decision upheld France's claim and right to seize the property; however, some public opinion states that this confiscation was part of a political strategy and motivated by past issues with Equatorial New Guinea. Leaving France in a bad place in the center of allegations

This case also affected the United Nations as it restated global norms on diplomatic immunity and asset recovery by stating that the diplomatic mission status cannot be attained by officials or federations who seek to shield illicit assets, as a result, this new claim reinforced the anti-corruption missions and set an important precedent for future cases.

The Citizens of Equatorial Guinea are alleged to have been affected by this case indirectly, as the confiscated assets are claimed to be funded by the money embezzled from Equatorial Guinea. Money that could have been used for public funding and a greater good for the country. The outcome of this case, however, can represent a public benefit to the citizens.

The Equatorial Guinea vs France case has faced many key roadblocks that have limited a resolution, which arise from legal and political issues. Legally, Equatorial Guinea did not meet UNCAC's requirements for the asset return they asked for, these requirements include a final judgment and approval by France and proof of the cooperation of the property to this stated diplomatic mission. Politically, French officials are insistent on the denial to return funds due to concerns of corruption and misuse of Equatorial Guinea's funds. Additionally, Equatorial Guinea's consistent resistance to proceedings and an overall tension between the parties have made cooperation difficult in the case, which creates a delay in case finalization of either asset recovery or stolen funds recovery.

Authority of the Court

The International Court of Justice can only entertain two types of cases:

1. Legal disputes between sovereign states are submitted to them
2. Advisory opinions on legal questions

On September 29th, 2022, Equatorial Guinea instituted proceedings before the International Court of Justice against the French Republic. This case alleges violations by France of its obligations under the United Nations Convention against Corruption of 31 October 2003. The International Court of Justice has jurisdiction over this case, as Article 66 'Settlement of dispute' of the United Nations Convention against Corruption states: "Parties shall endeavor to settle disputes concerning the interpretation or application of this Convention through negotiation". The article then mentions that if disputes between two or more state parties concerning the interpretation or application of this convention are unable to resolve the dispute after six months, any of the parties may refer to the International Court of Justice by request.

Subject matter of the dispute:

1. "The dispute between Equatorial Guinea and France concerns the interpretation and application of the United Nations Convention against Corruption of 31 October 2003 (hereinafter the "Convention"), to which both States are parties. "(icj.org)
2. "Equatorial Guinea considers that, by disregarding its request for the return of certain assets corresponding to property confiscated by decision of the French courts as the proceeds of misappropriation of public funds committed against Equatorial Guinea, France has violated its obligations under the Convention, in particular Article 57, paragraph 3 (c), thereof." (icj.org).

Questions a Judgment Should Ask

As of the prosecution, represented by Equatorial Guinea. Judgement should make sure to clarify the diplomatic status of the property by asking a clarification on how France violated Article 22 of the Vienna Convention on Diplomatic Relations by seizing Obiang's assets, then it should seek to identify the designation and immunity validity of

the property by questioning Equatorial's Guinea's choice of the property as diplomatic premises and why the ICJ should recognize the claimed diplomatic use, even without a formal acceptance by France. Then judgment has to seek to understand the immunity of state officials by asking if Teodoro Nguema Obiang Mangue enjoys immunity from criminal prosecution in France for the acts taken in his term as Vice President. Alongside asking if France's charges against Mangue are permissible under international law or otherwise interfere in Equatorial Guinea's internal affairs. The judgment should lastly understand its Jurisdiction and the failure in following procedural obligations by asking the prosecution if the ICJ has Jurisdiction to rule on the inviolability of diplomatic premises following the protocol of the Vienna Convention on Diplomatic Relations. Alongside the explanation on how France failed to proceed in diplomatic negotiations as required in Article 35 of the Palermo Convention before initiating criminal proceedings.

As of the defense, represented by France, the Judgement should first question the reason behind the denial of diplomatic premises and therefore immunity to the 42 Avenue Foch property. Then it should move to clarify the criminal procedure against Obiang by asking if Mangue's alleged money laundering falls under private acts, which are not protected by federal immunity under international law. The judgment should also ask if France's anti-corruption laws align with its obligations under the Vienna Convention on Diplomatic Relations. Lastly, the Judgement should move on to understanding the jurisdictional challenges by asking if the ICJ is prohibited from judging the case due to the failure of procedure according to the Palermo Convention's requirement for prior negotiations, which was allegedly ignored by Equatorial Guinea. Lastly, the judgment should understand the magnitude of the claimed factors by asking if France's right to prosecute crimes committed on its grounds overcomes Equatorial Guinea's claims for immunity.



International Court of Justice Netherlands ([icj-cij.org](https://www.icj-cij.org))

Side A (Prosecution)

Equatorial Guinea brought this case before the ICJ seeking justice following France's confiscation of property belonging to the state, following criminal proceedings initiated in France against Vice President Teodoro Nguema Obiang Mangue. Equatorial Guinea argues that these actions breached France's obligations under international law and violated the sovereign rights and immunities of the Equatoguinean State. It claims France violated Mr. Obiang's immunity and failed to comply with the 2020 ICJ judgment by continuing to confiscate assets, breaching its obligation to respect state immunity. Also, it requests the restitution of property, including the mansion in Paris, claimed to be part of Equatorial Guinea's diplomatic premises. Equatorial Guinea, through this case, seeks to cease all ongoing breaches of international obligations that France has committed and continues to commit during this dispute.

Side B (Defense)

France has kept firm through the allegation that Equatorial Guinea's claims constitute an abuse of the legal International processes, alongside the claim that this abuse is used to shield Vice-President Obiang from legitimate criminal proceedings for the charge of the embezzlement of over \$115 million in state funds. French officials argue that the designation of the 42 Avenue Forch property as a diplomatic mission only occurred after the initiation of money laundering investigations by French authorities, pointing out the blanks in the building's acquisition date and usage.

France has also countered with an accusation of systemic corruption by Equatorial Guinea; the evidence backing this accusation is the U.S. Department of Justice's \$30 million settlement with the vice president for similar offences. This accusation was then followed by the claim that the illicit funding used in the confiscation of the property is a lawful measure in the anti-corruption laws in France, instead of a violation of diplomatic inviolability, as the property was never notified as diplomatic premises according to the Vienna Convention.

In response to the claims of diplomatic immunity by Equatorial Guinea, France affirms that the Vice-President's criminal actions fall in the category of personal gain instead of official functions, therefore eliminating immunity under international law. Additionally, France has rejected Equatorial Guinea's arguments regarding the UN Convention against Transnational Organized Crime, asserting that this treaty does not include state immunity or property disputes therefore is irrelevant.

Appendix

The appendix serves as a supplementary resource for delegates, providing additional context, key legal documents, case studies, and data relevant to the issue at hand. It is

designed to support deeper understanding and more informed debate during conference sessions. Delegates are encouraged to refer to the appendix when formulating arguments or seeking clarification on complex legal matters. While not exhaustive, the materials included aim to guide effective and evidence-based participation in ICJ proceedings.

https://sherloc.unodc.org/cld/en/case-law-doc/corruptioncrimetype/_irb/2018/immunities_and_criminal_proceedings_equatorial_guinea_v._france.html

Source A: This appendix provides a detailed summary and legal analysis regarding the international case "Request relating to the Return of Property Confiscated in Criminal Proceedings (Equatorial Guinea v. France)," Mentioning the arguments presented by both parties before the ICJ, alongside with the ICJ's decision on jurisdiction, provisional measures and preliminary objections.

<https://journalmamater.fr/2024/12/02/diplomatic-immunities-and-legal-disputes-a-case-study-of-equatorial-guinea-vs-france-icj/>

Source B: This appendix summarizes the key legal and procedural structure of the United Nations Convention against Corruption, a convention established to combat corruption through a framework that includes preventive measures, the criminalization of corrupt practices, international cooperation, and asset recovery procedures, thereby strengthening legal procedures against corruption. Delegates can use this source to determine whether Obiang's actions, allegedly taken under diplomatic premises, constitute corruption or not, and what procedures to follow if they do

https://legal.un.org/ilc/texts/instruments/english/conventions/9_1_1961.pdf

Source C: This appendix explains the legal structure of the Vienna Convention on Diplomatic Relations, established in 1961. This convention provides the foundational

framework for diplomatic immunity and the privileges of diplomatic missions. Delegates can use this source to highlight the framework in which Equatorial Guinea claims to fit the 42 Avenue Forch premises into and conclude whether this claim is viable or not.

<https://www.france24.com/en/africa/20201211-un-court-rules-for-france-in-paris-mansion-row-with-equatorial-guinea>

Source D: This appendix summarizes the ICJ ruling in the dispute between Equatorial Guinea and France over the status of the Paris mansion allegedly purchased through illicit funds. Where, due to the diplomatic premise designation never being accepted by France, the International Court of Justice ruled in favor of France's right to seize the premises as part of criminal proceedings against Equatorial Guinea's Vice-President, Obiang, for money laundering and corruption.

<https://www.google.com/url?q=https://www.internationalaffairs.org.au/australianoutlook/the-icjs-judgment-in-equatorial-guinea-v-france-what-are-the-implications-for-international-diplomacy/&sa=D&source=docs&ust=1750994478360804&usg=AOvVaw3S1T6oS4uRQ6r4PqfDsm>

Source E: This appendix provides an analysis of the ICJ's judgment in the case of the "Request relating to the Return of Property Confiscated in Criminal Proceedings (Equatorial Guinea v. France)". This analysis states the ICJ ruling in favor of France, not consenting to the status of the premise, and therefore disregarding any diplomatic immunity claimed by Equatorial Guinea. Reinforcing that diplomatic immunity cannot be used by Equatorial Guinea to shield illegal activities such as corruption.

<https://www.mesacc.edu/sites/default/files/pages/academic-departments/social-science/ICJ%20Equatorial%20Guinea%20v%20France%20Brief.pdf>

Source F: This appendix provides a detailed summary of the ICJ's Equatorial Guinea v.

France case. It explains how the dispute arose after French officials began criminal proceedings against Equatorial Guinea's Vice-President for corruption, leading to the seizure of multiple properties, including a Paris property which Equatorial Guinea claimed served as diplomatic premises. This claim was rejected by the ICJ, as French officials never recognized these premises as part of a diplomatic mission. Then, as France announced plans to sell the building, Equatorial Guinea filed a new case alleging that France violated the UN Convention against Corruption, as it did not return the assets. However, problems with this claim arise as the convention only obligates asset return under conditions that Equatorial Guinea does not fit into.

<https://www.rusi.org/explore-our-research/publications/commentary/when-no-diplomatic-immunity-good-news-equatorial-guinea-v-france-international-court-justice>

Source G: This appendix summarizes the ICJ case *Equatorial Guinea v. France*, where the court ruled that the 42 Avenue Forch mansion, which French officials seized, was not officially a diplomatic property and therefore not protected by diplomatic immunity, upholding France's rights to seize the property. The source analyzes how this ruling creates an impact on the defense against corruption and on holding the accountability of high-ranking officials accountable internationally.

<https://journalmamater.fr/2024/12/02/diplomatic-immunities-and-legal-disputes-a-case-study-of-equatorial-guinea-vs-france-icj/>

Source H: This appendix summarizes the key legal and practical issues from the *Equatorial Guinea v. France* ICJ case, focusing on the boundaries of diplomatic immunity and the designation of diplomatic premises. Delegates may use this resource to gain a deeper understanding of how international law balances diplomatic protections with the fight against corruption and criminal activity. The case provides

valuable insights into the real-world application of the Vienna Convention and the responsibilities of both sending and receiving states.

<https://www.internationalaffairs.org.au/australianoutlook/the-icjs-judgment-in-equatorial-guinea-v-france-what-are-the-implications-for-international-diplomacy/>

Source I: This appendix provides an overview of the ICJ's judgment in *Equatorial Guinea v. France*, highlighting its implications for the designation and protection of diplomatic premises. Delegates may use this resource to understand how the Court clarified the receiving state's right to object to such designations, offering practical guidance for preventing abuse of diplomatic privileges. The case serves as a reference point for striking a balance between diplomatic immunity and accountability in international diplomacy.

<https://www.ejiltalk.org/equatorial-guinea-v-france-no-2-a-first-attempt-at-international-litigation-on-stolen-asset-recovery/>

Source J: This source summarizes the *Equatorial Guinea v. France* case as the first major attempt at international legal action concerning stolen asset recovery. Delegates may use this resource to explore how diplomatic immunity claims intersect with efforts to combat corruption and recover illegal assets. The case offers practical insights into the challenges and legal strategies involved in addressing transnational financial crime through international courts.

<https://www.google.com/url?q=https://www.icj-cij.org/case/163&sa=D&source=docs&ust=1750994565980799&usg=AOvVaw0DMdewlQLpe3NEdyZXXyG3>

Source K: Delegates can use this source to access primary documents, procedural history, and judgments related to the *Equatorial Guinea v. France* case, which is

essential for obtaining authoritative information and tracking the progress and outcomes of the dispute.

<https://www.courthousenews.com/equatorial-guinea-loses-challenge-to-seizure-of-french-mansion/>

Source L: This article provides a concise summary and analysis of the ICJ's decision regarding France's seizure of the Paris mansion claimed by *Equatorial Guinea* as diplomatic property. Delegates can use it to quickly grasp the case's background, the legal arguments presented by both sides, and the broader implications for diplomatic immunity and international law.

https://www.google.com/url?q=https://papers.ssrn.com/sol3/papers.cfm?abstract_id%3D4418385&sa=D&source=docs&ust=1750994589516297&usg=AOvVaw3Cmlbk1wiL4iEwCQ4FXdbO

Source M: Delegates may use this source to find academic research, legal analysis, and commentary related to the ICJ case or broader issues of international law. It is useful for obtaining scholarly perspectives, in-depth legal arguments, and references for further research.

<https://www.icj-cij.org/sites/default/files/case-related/184/184-20220929-APP-01-00-EN.pdf>

Source N: This official ICJ document provides the application or procedural submission for case 184, offering delegates detailed insight into the legal arguments, requests, and procedural steps taken by parties. It is valuable for understanding the formal positions and claims advanced in proceedings.

<https://www.icj-cij.org/sites/default/files/case-related/184/184-20250227-ord-01-00-en.pdf>

Source O: Delegates can use this document to review the most recent procedural order or decision issued by the ICJ 184. It is essential for staying updated on the latest developments, court instructions, or rulings that may affect the course of the case.

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