



OPERATIONAL GUIDANCE NOTE

LIBERIA

CONTENTS

1. Introduction	1.1 – 1.5
2. Country assessment	2.1 – 2.5
3. Main categories of claims	3.1 – 3.5
General country situation	3.6
Members of former rebel groups or ex-opposition political parties	3.7
Mandingos	3.8
Prison conditions	3.9
4. Discretionary Leave	4.1 – 4.2
Minors claiming in their own right	4.3
Medical treatment	4.4
5. Returns	5.1 – 5.3
6. List of source documents	

1. Introduction

- 1.1** This document summarises the general, political and human rights situation in Liberia and provides information on the nature and handling of claims frequently received from nationals/residents of that province. It must be read in conjunction with the RDS – IND COI Service Liberia Country of Origin Information Report October 2005 at:
- http://www.homeoffice.gov.uk/rds/country_reports.html
- 1.2** This guidance is intended to provide clear guidance on whether the main types of claim are or are not likely to justify the grant of asylum, Humanitarian Protection or Discretionary Leave. Caseworkers should refer to the following Asylum Policy Instructions for further details of the policy on these areas:
- API on Assessing the Claim
 - API on Humanitarian Protection
 - API on Discretionary Leave
 - API on the European Convention on Human Rights
- 1.3** Claims should be considered on an individual basis, but taking full account of the information set out below, in particular Part 3 on Main categories of claims.
- 1.4** Asylum and human rights claims must be considered on their individual merits. However, if following consideration, the claim is refused, caseworkers should consider whether the claim can be certified as clearly unfounded under the case by case certification power in section 94(2) of the Nationality, Immigration and Asylum Act 2002. A claim will be clearly unfounded if it is so clearly without substance that it is bound to fail. The information set out below contains relevant country information, the most common types of claim and guidance from the courts, including guidance on whether certain types of claim are likely to be clearly unfounded.

Source documents

1.5 A full list of source documents cited in the footnotes is at the end of this note.

2. Country assessment

- 2.1 Liberia has been in a state of civil conflict since 1989. This has resulted in widespread displacement of its population, both within the country and into other countries throughout the region. In 1997, Charles Taylor was elected President, but his rule did not lead to stability and widespread civil conflict continued with those opposed to his regime. There were also widespread human rights abuses by government forces and militias supporting the Taylor government, particularly in Lofa County in the north of the country. On 11 August 2003, President Taylor stood down from office and left Liberia. His Vice President Moses Zeh Blah replaced him as acting President. On 14 October 2003, Gyude Bryant was inaugurated as Chairman of the National Transitional Government of Liberia (NTGL) which has been recognised by all factions involved in the civil conflict.¹
- 2.2 During 2004, the NTGL continued to govern under a power sharing agreement within the terms of the Comprehensive Peace Agreement (CPA) and remained highly centralised, extending its influence into rural areas; however, former Liberians United for Reconciliation and Democracy (LURD), Movement for Democracy in Liberia (MODEL), and government combatants retained some influence in those areas, even in areas with the UN's mission (UNMIL) presence. In 2004, the country's transition to democracy was hindered by widespread corruption, a severely damaged infrastructure, and continuing instability that delayed the return of thousands of refugees and internally displaced persons (IDPs). The judiciary was subject to political influence, economic pressure, and corruption.² Liberia's first peacetime presidential elections took place in October 2005, with the successful candidate Ellen Johnson-Sirleaf narrowly defeating rival George Weah in a second round run-off. International election monitors ruled the election to be generally free and fair though there were allegations of vote-rigging in the second round poll which have delayed the formal declaration of the result pending an investigation by the electoral authorities.³
- 2.3 During 2004, the NTGL generally respected the human rights of its citizens, although problems continued in some areas. Interim police officers sometimes abused, harassed, and intimidated persons. Prison conditions remained harsh and sometimes life threatening. Corruption and official impunity were problems, and there was little investigation into abuses committed during the war. The police continued to use arbitrary arrest and detention, and lengthy pretrial detention was common. The judicial system was unable to ensure citizens' rights to due process and a fair trial.⁴
- 2.4 In 2004, the National Transitional Legislative Assembly (NTLA) threatened to arrest persons who criticised the NTLA. In some rural areas where the judiciary had not been re-established, clan chieftains administered criminal justice through the traditional practice of trial-by-ordeal; however, unlike in the past, authorities did not tacitly condone the practice. Incidents of ritualistic killings persisted. Violence and discrimination against women were problems. The welfare of children widely remained neglected, and female genital mutilation (FGM) continued to be practised. Societal ethnic discrimination remained widespread, and ethnic differences continued to generate violence and political tensions.⁵

¹ Home Office COI Service Liberia Country of Origin Information Report October 2005 (paras 4.01 – 4.02 & 5.01 – 5.02)

² COI Service Liberia Country Report (paras 5.05 – 5.09)

³ BBC World News: Africa. 'Inquiry into Liberia poll results' 16 November 2005

⁴ COI Service Liberia Country Report (para 6.01)

⁵ COI Service Liberia Country Report (paras 6.01)

2.5 UNMIL peacekeepers, UN-sponsored reintegration and restructuring exercises and an international police force's (CIVPOL) support for the interim national police force and training of a new police service improved security throughout the country and helped facilitate governmental efforts to improve human rights. Since the NTGL assumed power, there have been no reports that government security forces were responsible for unlawful killings, summary executions, disappearances, or torture. There have also been no reports that the Government restricted freedom of speech and of the press, detained and intimidated journalists, restricted freedom of movement, harassed human rights monitors, or discriminated against particular ethnic groups.⁶

3. Main categories of claims

3.1 This Section sets out the main types of asylum claim, human rights claim and Humanitarian Protection claim (whether explicit or implied) made by those entitled to reside in the country of Liberia. It also contains any common claims which may raise issues covered by the API on Discretionary Leave. Where appropriate it provides guidance on whether or not an individual making a claim is likely to face a real risk of persecution, unlawful killing or torture or inhuman or degrading treatment/punishment. It also provides guidance on whether or not sufficiency of protection is available in cases where the threat comes from a non-state actor; and whether or not internal relocation is an option. The law and policies on persecution, Humanitarian Protection, sufficiency of protection and internal relocation are set out in the relevant APIs, but how these affect particular categories of claim are set out in the instructions below.

3.2 Each claim should be assessed to determine whether there are reasonable grounds for believing that the applicant would, if returned, face persecution for a Convention reason - i.e. due to their race, religion, nationality, membership of a particular social group or political opinion. The approach set out in *Karanakaran* should be followed when deciding how much weight to be given to the material provided in support of the claim (see the API on Assessing the Claim).

3.3 If the applicant does not qualify for asylum, consideration should be given as to whether a grant of Humanitarian Protection is appropriate. If the applicant qualifies for neither asylum nor Humanitarian Protection, consideration should be given as to whether he/she qualifies for Discretionary Leave, either on the basis of the particular categories detailed in Section 4 or on their individual circumstances.

3.4 This guidance is **not** designed to cover issues of credibility. Caseworkers will need to consider credibility issues based on all the information available to them. (For guidance on credibility see para 11 of the API on Assessing the Claim).

3.5 Also, this guidance does not generally provide information on whether or not a person should be excluded from the Refugee Convention or from Humanitarian Protection or Discretionary Leave. (See API on Humanitarian Protection and API on Exclusion under Article 1F or 33(2) and API on DL)

All APIs can be accessed via the IND website at:

http://www.ind.homeoffice.gov.uk/ind/en/home/laws_policy/policy_instructions/apis.html

3.6 General country situation

3.6.1 A significant proportion of applications made by Liberian nationals are based on the general security situation in Liberia. Applicants may claim a fear of return because of uncertainty

⁶ COI Service Liberia Country Report (para 6.03)

regarding the prospects of long-term peace, or a fear that they will not be safe from former LURD, MODEL or ex-government combatants in NTGL-held areas.

- 3.6.2 Treatment.** During 2004, the NTGL, remained highly centralised but extended its influence into rural areas; however, former LURD, MODEL, and government combatants retained some influence in those areas, even in areas with an UNMIL presence. Though the country's transition to democracy was hindered by widespread corruption, a severely damaged infrastructure, and continuing instability that delayed the return of thousands of refugees and internally displaced persons (IDPs),⁷ Liberia's first peacetime presidential elections took place in October 2005, with the successful candidate Ellen Johnson-Sirleaf narrowly defeating rival George Weah in a second round run-off. International election monitors ruled the election to be generally free and fair though there were allegations of vote-rigging in the second round poll.⁸
- 3.6.3** Since the NTGL assumed power, the government has generally respected the human rights of Liberians. There have been no reports that government security forces have been responsible for unlawful killings, summary executions, disappearances, or torture. There were also no reports that the Government has restricted freedom of speech and of the press or detained and intimidated journalists. Nor have there been any reports that the government has restricted freedom of movement, harassed human rights monitors, or discriminated against particular ethnic groups.⁹
- 3.6.4 Sufficiency of protection.** The NTGL now controls the vast majority of the country, including all major official border crossings. There is a functioning national police force - Liberian National Police (LNP) - which has primary responsibility for law enforcement. Although the LNP itself has limited logistics and forensic capabilities and is sometimes criticised for its excesses, it is supported by the deployment of 1,100 international police (CIVPOL).¹⁰ Claimants do therefore have an avenue, especially in Monrovia, to seek and receive from the authorities protection against crime or violence at the hands of rebel combatants.
- 3.6.5 Internal relocation.** Although the government, with the support of UN peace keepers, controls the vast majority of the country, there remains instances of general lawlessness, crime or violence at the hands of LURD, MODEL or ex-Government combatants in some rural areas of the country. However these incidents are localised. There is freedom of movement within Liberia and those who have encountered general lawlessness, crime or violence at the hands of LURD, MODEL or ex-Government combatants are therefore able to relocate to another part of the country to escape such a threat.¹¹
- 3.6.6 Caselaw.**

IAT Determinations: LB Liberia [2004] UKIAT 00299 (CG case). Assessment of the situation in Liberia with regard to the security situation and the humanitarian conditions in Monrovia (Article 2 & 3). This appellant was a Muslim and part-Mandingo. The Tribunal followed the case of T 00164 (see below) and found that the situation in Monrovia is safe. They also found that the appellant faced no enhanced risk on account of his religion or ethnicity.

T Liberia [2003] UKIAT 00164. Assessment of the security situation in Liberia and in particular the risk on return to the appellant in Monrovia (Article 3). The appellant was a Muslim of Mandingo ethnicity. There has been a cease-fire in Liberia and the position now is 'radically different' from before. UN troops are present and keeping peace in the city, the IDP camps are safe with no security problems. The Tribunal find that someone of Mandingo ethnicity and Muslim faith would

⁷ COI Service Liberia Country Report (paras 5.07 – 5.09)

⁸ BBC World News: Africa. 'Inquiry into Liberia poll results' 16 November 2005

⁹ COI Service Liberia Country Report (paras 6.01 – 6.03)

¹⁰ COI Service Liberia Country Report (paras 5.20 – 5.26 & 5.36 – 5.37)

¹¹ COI Service Liberia Country Report (paras 6.45 – 6.48)

not be at an enhanced risk in Monrovia. The IAT conclude that an ordinary Liberian citizen in Monrovia or a camp nearby is not at a real risk of harm contrary to Article 3.

3.6.7 Conclusion. Since the establishment of the NTGL in October 2003, the government has been progressively extending its control and the political, human rights and security conditions in the vast majority of the country have improved markedly. For claimants who fear, or who have experienced, ill-treatment at the hands of dissident combatants in some rural areas of the country there is a general sufficiency of protection and they are also able to safely relocate within the country. General lawlessness, poverty or a lack of access to resources will not, in themselves, be sufficient to warrant the grant of asylum or humanitarian protection. In light of the current conditions in Liberia, applications under this category are likely to be clearly unfounded and as such should be certified.

3.7 Members of former rebel groups or ex-opposition political parties

3.7.1 Some claimants may fear ill treatment by the state authorities based on their affiliation with or membership of, a former rebel group: LURD or MODEL, or members of political parties that were opposed to the former Taylor regime.¹²

3.7.2 Treatment. LURD and MODEL and the other main political parties have recognised the NTGL as the state authority and their senior members hold positions within the transitional authority structure. However some factions of LURD and MODEL and factions of combatants associated with the former Taylor regime, are still strong independent influences in some small parts of Liberia. In November 2004, the heads of Liberia's three factions signed an agreement to dissolve their movements' military wings and do away with violence, paving the way for them to stand at the general elections in 2005. The former government of ex-president Charles Taylor, as well as two former rebel groups LURD and MODEL all promised a peaceful future in a ceremony in the capital, Monrovia. These events occurred three days after the UN-led disarmament programme officially ended.¹³

3.7.3 Liberia's first peacetime presidential elections took place in October 2005, with the successful candidate Ellen Johnson-Sirleaf narrowly defeating rival George Weah in a second round run-off. All ex-rebel force contenders were eliminated in the first round of voting. International election monitors ruled the election to be generally free and fair though there were allegations against of vote-rigging in the second round poll.¹⁴

3.7.4 Sufficiency of protection. As this category of claimants' fear is of ill treatment or persecution by the state authorities, they cannot apply to these authorities for protection.

3.7.5 Internal relocation. As this category of claimants' fear is of ill-treatment or persecution by the state authorities, relocation to another area of the country to escape this threat is not feasible.

3.7.6 Caselaw.

IAT Determinations: JM Liberia [2004] UKIAT 00111. The appellant claimed to be a member of the Lofa Defence Force. The IAT followed the case of T 00164 and found that the situation has not deteriorated and that if anything has improved save for two localised incidents. If the appellant had been a rebel he would still not succeed, as there is still no risk on return to Monrovia at present.

3.7.7 Conclusion. There is no evidence of any state persecution of members, or those associated, with former rebel groups or political opponents and the NGTL are widely reported to generally respect the human rights of its citizens. LURD, MODEL and all parties

¹² COI Service Liberia Country Report (paras 5.07 – 5.09 & Annex B)

¹³ COI Service Liberia Country Report (paras 4.01 – 4.02 & 5.07 – 5.09)

¹⁴ BBC World News: Africa. 'Inquiry into Liberia poll results' 16 November 2005

formerly opposed to the previous Taylor regime have endorsed, co-operated with and (to varying extents) participated in the NTGL. Individual members of these groups involved in criminal activity; either low level localised violence or suspected war criminals, may face prosecution. In light of the current geo-political situation, members of any of the mainstream factions of these groups do not now in general have a real risk of ill treatment amounting to persecution and would therefore not qualify for a grant of asylum. Applications under this category are likely to be clearly unfounded and as such should be certified.

3.8 Mandingos

- 3.8.1** Some applicants claim asylum based on alleged ill treatment amounting to persecution at the hands of ethnic minority groups, such as Christian non-Mandingos and Lormas on account of them being of Mandingo origin.
- 3.8.2** *Treatment.* The Mandingos are a predominantly Muslim group. In 2002 and 2003, many Mandingos encountered hostility from the Taylor regime, which viewed them as being opposed to his rule. There was also ethnic tension in recent years, between the Mandingos and the Lormas in Lofa County. LURD had drawn much of its support from the Mandingos, and its success allowed some of them to return to Lofa county, and parts of Bong and Nimba counties, which are under LURD control.¹⁵ During 2004, ethnic tensions continued in Lofa County between the Mandingos and the Lormas while Mandingos continued to return to Lofa, Bong, and Nimba counties, small parts of which remain dominated by LURD.¹⁶
- 3.8.3** Differences involving ethnic groups, notably the Krahn, Mano, Gio, Lorma and Mandingo ethnic groups contributed to serious political violence and abuses in 2004. Ethnic, religious, and other differences between Muslim Mandingos and Christian non-Mandingos in Monrovia have contributed to mob violence. In October 2004, a land dispute in Monrovia between Muslim Mandingos and Christian non-Mandingos erupted into a riot that resulted in 19 deaths, hundreds of injuries, and the looting and burning of businesses, mosques, and churches. UNMIL forces arrested approximately 250 persons on charges ranging from murder and arson to breaking an NTGL-imposed curfew. It was unclear whether the violence was triggered by religious conflict, ethnic differences, or other factors.¹⁷ To date, there have not been any recurrences of such civil unrest after UNMIL and the LNP quickly restored order.
- 3.8.4** *Sufficiency of protection.* Since the end of the Taylor regime in June 2003, before which Mandingos were subject to an element of state-sponsored discrimination, there has been no evidence to suggest that persons of Mandingo origin would not be able to seek and receive protection from the state authorities. There is a functioning national police force - Liberian National Police (LNP) - which has primary responsibility for law enforcement. Although the LNP itself has limited logistics and forensic capabilities and is sometimes criticised for its excesses, it is supported by the deployment of 1,100 international police (CIVPOL).¹⁸ Claimants do therefore have an avenue, especially in Monrovia, to seek and receive from the authorities protection against crime or violence at the hands of rebel combatants.
- 3.8.5** *Internal relocation.* Instances where members of other ethnic minority groups have targeted Mandingos are localised. Although the government, with the support of UN peace keepers, controls the vast majority of the country, there remains instances of general lawlessness, crime or violence at the hands of LURD, MODEL or ex-Government combatants in some rural areas of the country. However these incidents are localised. There is freedom of movement within Liberia and those who have encountered general

¹⁵ COI Service Liberia Country Report (paras 6.52 – 6.53)

¹⁶ US State Department Country Report on Human Rights Practices in 2004: Liberia (Section 1 & 5)

¹⁷ USSD 2004 (Section 1 & 5)

¹⁸ COI Service Liberia Country Report (paras 5.20 – 5.26 & 5.36 – 5.37)

lawlessness, crime or violence at the hands of LURD, MODEL or ex-Government combatants are therefore able to relocate to another part of the country to escape such a threat.¹⁹

3.8.6 **Caselaw.**

IAT Determinations: T 00164 [2003] & LB 00299 [2004] above. There is no enhanced risk to a Muslim or someone from the Mandingo ethnic group on return to Monrovia.

3.8.7 Conclusion. The possibility remains that individuals could be targeted by non-state agents because of their ethnicity, but there would usually be other causative factors. Most of the violence that is occurring, would appear to be associated with general lawlessness, rather than a concerted policy on the part of any ethnic, or political group, to persecute another group solely because of its ethnicity, or political associations. There is no risk of persecution or ill-treatment of someone of Mandingo origin by the state authorities. For those who fear such treatment at the hands of non-state agents there is a general sufficiency of protection and they are also able to safely relocate within Liberia to escape such threats. It is therefore unlikely that a claimant of Mandingo origin would be able to establish a claim to asylum or humanitarian protection solely because of their ethnic origin. Applications under this category are likely to be clearly unfounded and as such should be certified.

3.9 **Prison conditions**

3.9.1 Applicants may claim that they cannot return to Liberia due to the fact that there is a serious risk that they will be imprisoned on return and that prison conditions are so poor as to amount to torture or inhuman treatment or punishment contrary to Article 3.

3.9.2 Treatment. Prison conditions were harsh and in some cases life threatening; however, unlike in 2003, there were no reports that the Government operated unofficial detention facilities where detainees were tortured. The Government did not provide detainees or prisoners with adequate food or medical care. Cells at Monrovia Central Prison were overcrowded, mostly with detainees awaiting trial; however, during 2004 international organisations began providing food and hygiene to the prison. In some counties, the structure that served as a jail was a container with bars at one end. There also were reports that local officials forced prisoners to work for them.²⁰

3.9.3 Unlike in 2003, there were no reports in 2004 that the Government used house arrest or detained political prisoners. Women were held in separate cells in conditions comparable to those of the male prisoners and detainees. There were no separate facilities for juvenile offenders. Women and particularly juveniles were subject to abuse by guards or other inmates. Convicted prisoners and detainees awaiting trial were not held in separate facilities. The Government permitted the independent monitoring of prison conditions by local human rights groups, the media, and the International Committee of the Red Cross (ICRC). Some human rights groups, including the ICRC, paid regular visits to detainees at police headquarters and prisoners at the Monrovia Central Prison.²¹

3.9.4 Conclusion. Whilst prison conditions in Liberia are poor with overcrowding and a lack of food and medical care being particular problems, these conditions are unlikely to reach the minimum level of severity required to reach the Article 3 threshold. Therefore even where claimants can demonstrate a real risk of imprisonment on return to Liberia a grant of Humanitarian Protection will not generally be appropriate. However, the individual factors of each case should be considered, such as the seriousness or nature of the offence, the likely

¹⁹ COI Service Liberia Country Report (paras 6.45)

²⁰ COI Service Liberia Country Report (para 5.30)

²¹ COI Service Liberia Country Report (paras 5.31 – 5.33)

length of detention and the likely type of detention facility. These will need to be taken into account along with an individual's personal characteristics such as their age, gender and state of health. Individual cases, where the claimant demonstrates a real risk of imprisonment for a substantial period of time upon return, or where the claimant demonstrates a particular likelihood of ill-treatment, will need to be considered together with any personal characteristics which make the individual particularly vulnerable. Where taken together all these factors amount to a breach of Article 3 a grant of Humanitarian Protection will be appropriate.

4. Discretionary Leave

4.1 Where an application for asylum and Humanitarian Protection falls to be refused there may be compelling reasons for granting Discretionary Leave (DL) to the individual concerned. (See API on Discretionary Leave)

4.2 With particular reference to Liberia the types of claim which may raise the issue of whether or not it will be appropriate to grant DL are likely to fall within the following categories. Each case must be considered on its individual merits and membership of one of these groups should not imply an automatic grant of DL. There may be other specific circumstances not covered by the categories below which warrant a grant of DL-see the API on Discretionary Leave.

4.3 Minors claiming in their own right

4.3.1 Minors claiming in their own right who have not been granted asylum or HP can only be returned if there is a family to return to or where there are adequate care and support arrangements. At the moment we do not have sufficient information to be satisfied that there are adequate care and support arrangements in place in Liberia.

4.3.2 Minors claiming in their own right without a family to return to, or where there are adequate care and support arrangements, should, if they do not qualify for leave on any more favourable grounds, be granted Discretionary Leave for a period of three years or until their 18th birthday, whichever is the shorter period.

4.4 Medical treatment

4.4.1 Applicants may claim they cannot return to Liberia due to a lack of specific medical treatment. See API on ECHR and DL and the IDI on Medical Treatment, which set out the requirements for Article 3 to be engaged. Where the lack of treatment on return would make removal contrary to Article 3 and/or 8 a grant of Discretionary Leave to remain will be appropriate.

4.4.2 The medical infrastructure in Liberia has yet to recover from the period of civil conflict, and is highly reliant on foreign aid and charities for assistance. There is a lack of both resources and staff, and specialist care is not readily available.²²

4.4.3 Where a caseworker considers that the circumstances of the individual applicant and the situation in the country reach the threshold detailed in the IDI on Medical Treatment making removal contrary to Article 3 or 8 a grant of Discretionary Leave to remain will be appropriate. Such cases should always be referred to a Senior Caseworker for consideration prior to a grant of Discretionary Leave.

²² COI Service Liberia Country Report (paras 5.39 – 5.45)

5. **Returns**

- 5.1 Factors that affect the practicality of return such as the difficulty or otherwise of obtaining a travel document should not be taken into account when considering the merits of an asylum or human rights claim. Removals are to the capital, Monrovia.
- 5.2 In August 2005, the UNHCR maintained its position that states should not forcibly return failed asylum seekers to Liberia.²³ The UNHCR's position provides a broad assessment of the situation in Liberia and we do not dispute that it presents an accurate overview of the general humanitarian situation and the social and security problems inherent in a country which, until recently, was dominated by civil war. However, asylum and human rights claims are not decided on the basis of the general situation - they are based on the circumstances of the particular individual and the risk to that individual. We do not therefore accept UNHCR's conclusion, based on their overview of the general situation in Liberia, that all persons originating from Liberia are in need of some form of international protection.
- 5.3 Liberian nationals may return voluntarily to any region of Liberia at any time by way of the Voluntary Assisted Return and Reintegration Programme run by the International Organisation for Migration (IOM) and co-funded by the European Refugee Fund. IOM will provide advice and help with obtaining travel documents and booking flights, as well as organising reintegration assistance in Liberia. The programme was established in 2001, and is open to those awaiting an asylum decision or the outcome of an appeal, as well as failed asylum seekers. Liberian nationals wishing to avail themselves of this opportunity for assisted return to the Liberia should be put in contact with the IOM offices in London on 020 7233 0001 or www.iomlondon.org.

6. **List of source documents**

- UK Home Office COI Service Liberia Country of Origin Information Report October 2005 at: http://www.homeoffice.gov.uk/rds/country_reports.html
- BBC World News: Africa. 'Inquiry into Liberia poll results' 16 November 2005 at: <http://news.bbc.co.uk/1/hi/world/africa/4441610.stm>
- US Department of State Country Report on Human Rights Practices 2004: Liberia, 28 February 2005 <http://www.state.gov/g/drl/rls/hrrpt/2004/41611.htm>

**Asylum and Appeals Policy Directorate
2 December 2005**

²³ COI Service Liberia Country Report (para 6.73)