

## ALTERNATIVE JUSTICE:

# ANALYZING THE ULA'S LEGAL SYSTEM IN ARAKAN

(November 2020 to November 2023)



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Center for Arakan Studies

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## Executive Summary

- The initiation and expansion of the ULA's judiciary system can be seen as one of the fastest-growing judiciary channels parallel to the existing state's judicial system in Myanmar. The two key reasons behind this phenomenon are the increasing power projection by the ULA/AA-led movement and the popularity of the judiciary. Just within two years of its judicial establishment in 2021, the ULA-led judiciary service became the dominant force against the SAC-led courts.
- Even though the judiciary structure and hierarchy of the ULA are different from those of the SAC, the basic legal system and practices at both courts are not technically very different from each other. Former judges, lawyers, and legal advocates at Naypyidaw's courts became the judges and lawyers at the ULA courts. On another front, the accessibility, affordability, and effectiveness of the ULA courts are also comparatively greater than those of the SAC.
- The enforcement of the ULA courts is quite recognizable, especially when clients take less time and energy in facing judicial disputes. More importantly, the legal decisions made by the courts have enforcement power carried out by the executive branch, including the police, prisons, and other departments. Furthermore, the ULA courts are seen as politically independent or autonomous in making judicial decisions. However, there are still challenges related to nepotism, favoritism, and corruption depending on individual judges or cases.
- Public perception of the ULA's judiciary system is commonly positive, and many see it as obviously better than that of the SAC. However, there are also criticisms, especially regarding the capacity of the judges in the courts and the police investigation to support the judication. Some also suggest the necessity of changing the office environment to suit a 'modern court' in terms of infrastructure. More importantly, legal experts point out that the ULA's judiciary system needs to implement modern tools and techniques to find solutions in highly sensitive cases like rape and murder. Perceptions among minority groups are diverse; while some think it is a better alternative, others point out instances of discrimination.
- The ULA's justice system is far from perfect. In some cases, it has faced resounding criticism from the local population due to misbehavior and abuse of power, resulting in the deaths of suspects. With the increasing controls in urban centers, new challenges are emerging, and observers suggest that the ULA's judiciary system needs adaptable change and reform to provide effective justice for the local population.



Myanmar Information Management Unit



# District Map - Rakhine State



Disclaimer: The names shown and the boundaries used on this map do not imply official endorsement or acceptance by the United Nations.



# 1. Introduction

## A. Background Information

The establishment of the judiciary institution by the United League of Arakan/Arakan Army (ULA/AA) in Arakan, known as Rakhine state, is one of the most pioneer tasks carried out by the movement. Even if the ULA has initiated resolution of the judiciary disputes – starting just after a few years of its armed struggles in Arakan region – the introduction of a de facto ceasefire in November 2020 brought a larger momentum of judiciary appearance. This move was strategically taking advantage of the Myanmar military-led State Administration Council (SAC)'s shift in focus towards suppressing nationwide anti-coup movements following the 2021-military coup. The ULA expanded its administrative and judiciary operations in central and northern townships especially in rural areas of Rakhine state.

At that time, their influence spread from central Arakan to areas extending from the Bangladesh border through southern Chin State to southern Rakhine State.<sup>1</sup> The AA first engaged in conflict with the Myanmar military in northern Rakhine State in 2015. Hostilities escalated in late 2018 and persisted until early November 2020, just three months before the military coup<sup>2</sup>. Major-General Twan Mrat Naing, the chairman of the ULA, has advocated for “confederation status” for the people of Arakan, akin to the current governance model of the United Wa State Army (UWSA)<sup>3</sup>.

Over the past decade, the ULA/AA has dramatically altered the power dynamics in Rakhine State. Following intense clashes with the Myanmar military between 2015 and 2020, an informal ceasefire in November 2020 allowed the ULA to strengthen its position by building and expanding a parallel administration. Although hostilities resurfaced in late 2021, leading to renewed conflict in 2022, a fragile ceasefire was once again reached in November 2022<sup>4</sup>. The power dynamics in Rakhine have undergone a significant transformation over the past decade, driven by the ULA/AA.

This paper aims to analyze the ULA's judicial developments and impacts mainly starting from November 2020 to November 2023, a date before the resumption of armed clashes on November 14, 2024. The report also focuses on the parallel structures with the existing SAC judiciary system and how it differs. In addition, the study has also attempted to examine questions like to what extent the judiciary system has the enforcement power and is independent from the political influence. As the ULA's judiciary evolved over these years, it is critical to examine how it has been perceived by the local population. Therefore, this report also seeks to explore public perceptions of justice under the ULA system and more importantly, uncover the lives of the minority groups under the ULA jurisdiction. Finally, the report analyzed the critiques and suggestions towards the ULA judiciary including the three prominent judicial cases that had encountered concerns of the local community.

For the data analysis, this report relies on a range of qualitative data to explore the development and impact of the ULA's judiciary system. Key data sources include Key Informant Interview (KII), interviews with local residents, and those who have possessed experiences in this sector as well as observations from the local CAS team members. Besides, the report also analyzed some local and international media reports, official ULA statements, and other relevant documents to contextualize the judiciary's role and function. By drawing from these diverse qualitative sources, the study offered a comprehensive understanding of the ULA's judiciary and its broader implications for justice in Arakan.

## B. Literature Review

In conflict zones, political legitimacy is often built through the provision of justice by rebel (armed groups) or alternative governance systems. These non-state justice mechanisms emerge where state authority is weak or contested, offering communities a sense of order and accountability. The perception of fairness, efficiency, and accessibility of these insurgent-led judicial systems plays a critical role in shaping public support. For instance, Stathis Kalyvas (2006) highlighted how armed organizations, or armed groups use governance structures, including courts, as a strategic tool to foster legitimacy among civilians<sup>5</sup>.

Similarly, Clunan and Trinkunas (2010) emphasized that these systems often fill the void left by ineffective state institutions, gaining traction by resolving local disputes and upholding social norms<sup>6</sup>. South Sudan, still grappling with the fallout from a 50-year civil war and ongoing ethnic conflicts, faces significant challenges in its nation-building efforts. The recent ethnic clashes highlight the need for a rule-of-law strategy that adheres to modern human rights standards while integrating the legal traditions of its over 60 ethnic groups<sup>7</sup>. The coexistence of traditional justice systems with a weak statutory legal framework underscores the importance of these systems in such a diverse country.

In South Sudan, traditional justice systems were seen as more legitimate than state courts, while Hezbollah's parallel courts in Lebanon helped solidify its political base.<sup>8</sup>

On the other side, Mampilly (2011) added that insurgent governance involves non-state armed groups setting up parallel governmental structures, including judicial systems, in areas where state authority is weak or absent. These systems, often operating as de facto governments, provide crucial services like law and order to gain local legitimacy<sup>9</sup>. Global examples include the Tamil Tigers in Sri Lanka<sup>10</sup> and the Revolutionary Armed Forces of Columbia (FARC)<sup>11</sup> in Colombia, which both established their own judicial mechanisms. In conflict zones, where state justice systems are ineffective or non-existent, alternative justice mechanisms often emerge. These systems, which can be set up by local authorities, insurgents, or NGOs, aim to restore order and address grievances swiftly<sup>12</sup>. Notable instances include the Taliban's Islamic judicial system in Afghanistan<sup>13</sup> and the Maoists' "people's court" in Nepal<sup>14</sup>, which provided justice where official state mechanisms were inadequate.

Around the world, there are different kinds of the judiciary systems that states are practicing, and it is the most important thing that any kind of judicial system should give the justice towards the civilians at the first priority. Therefore, discussing whether a judiciary system is effective or not becomes lifeblood for all the states and all the societies around the globe as it can uphold the rule of law and ensure justice. In order to examine the critical characteristics for a general judiciary system, if it has effectiveness, matters include independence, transparency, impartiality and fairness plus accountability, enforceability, competence and expertise, enforceability of judgments and public acceptances, public participation and representation, human rights protections, and cultural sensitivity.

At the first theme, the judiciary must have independence and adjudicate cases with impartiality, relying solely on factual evidence and legal principles. Decisions should be made without any undue restrictions, external influences, inducements, pressures, threats, or interferences, whether direct or indirect, from any source or for any reason<sup>15</sup>. Alongside independence, impartiality and fairness are vital, ensuring that all citizens, regardless of their background, receive equal treatment under the law, thus preventing favoritism or bias<sup>16</sup>. A judiciary free from external influence and a transparent law enforcement system are fundamental to upholding democracy and ensuring the rule of law<sup>17</sup>. So, it can be regarded that transparency in the judicial process, including the publication of rulings and accessible legal processes, builds trust in the system and makes it accountable to the public<sup>18</sup>, allowing for mechanisms to address judicial misconduct or errors<sup>19</sup>.

Moreover, a judiciary must be efficient and accessible to ensure timely justice and that legal services are within reach of all people, especially in conflict-prone or resource-poor areas<sup>20</sup>. Another key trait is legal consistency and adherence to precedent, which provides predictability in legal rulings and prevents arbitrary decisions<sup>21</sup>. Additionally, competence and expertise within the judiciary ensure that legal professionals are well-versed in the law and capable of handling complex legal issues with precision<sup>22</sup>. The judiciary should also reflect the society it serves, promoting public participation and representation, which can be achieved through systems like public hearings or jury participation, ensuring inclusivity.<sup>23</sup>

According to United Nation Declaration of Human Rights (UDHR), the protection of human rights is another cornerstone, with the judiciary acting as the safeguard of individual freedoms, aligning its rulings with international human rights standards<sup>24</sup>. Furthermore, the other most important thing is that judicial decisions must be enforceable, meaning that mechanisms are in place to ensure that court rulings are respected and implemented, maintaining the rule of law<sup>25</sup>. Lastly, in multicultural societies, the judiciary must exhibit cultural sensitivity, recognizing and respecting customary laws and practices where appropriate, thus making the legal system relevant to all communities it serves<sup>26</sup>. Among all, independence, fairness, transparency and public representation should be analyzed over the judiciary systems of the ULA compared to junta jurisdiction here.

In post-conflict transitions, the reintegration of insurgent-led judicial systems into national frameworks presents unique challenges. These insurgent courts, often seen as more credible by local populations due to their efficiency and accessibility, can complicate the restoration of state-led justice. McEvoy and McGregor examine how grassroots activism, often tied to insurgent systems, plays a critical role in shaping justice during transitions from conflict to peace<sup>27</sup>. In Northern Ireland, informal paramilitary dispute resolution processes continued even after the Good Friday Agreement<sup>28</sup>, while the Moro Islamic Liberation Front (MILF) in the Philippines successfully negotiated the integration of their judicial system into the national framework as part of a broader peace deal<sup>29</sup>.

Besides those ideas of peace and insurgents-led judicial systems in national framework, as García-Godos (2013) argues, victim groups and organizations play a critical role in shaping accountability agendas and promoting distributive justice. In her analysis of cases in Colombia and Peru, she emphasizes that transitional justice, particularly victim reparations, cannot advance without recognizing victims as political actors asserting their rights<sup>30</sup>. Similarly, the

ULA/AA's formation of its judiciary system aligns with this argument, as it functions like a victim organization by creating accountability and promoting justice and peace in the region.

### C. Interviewees' Profiles

CAS team has conducted with different local respondents from various areas in the region, particularly from the areas that are closely linked to have access to ULA/AA's judiciary system and courts. These interviewees were selected based on their substantial legal knowledge and diverse backgrounds, ensuring that the ULA's judicial foundations are well-represented across the region.

However, there were several limitations related to the interviews due to the current internet shutdown and security concerns stemming from ongoing clashes between the junta forces and ULA/AA. Fortunately, five interviewees agreed to participate among several connections made by the CAS team. These interviews provide insightful analysis regarding the challenges and opportunities within the ULA's judiciary system.

To protect the interviewees' safety, their names, ages, and organizational affiliations have been omitted. Instead, codes and pseudonyms will be used throughout the report.

| No | Code Name    | Interview Date       | Name                  | Profile   |
|----|--------------|----------------------|-----------------------|---|
| 1. | Respondent-1 | 11 September, 2024   | Ko Min<br>(Pseudonym) | A master's degree in international law, who's a legal consultant has worked for several CSOs. |
| 2. | Respondent-2 | 16 September, 2024   | Ko Han<br>(Pseudonym) | A current legal advocate, with long-term legal background.                                    |
| 3. | Respondent-3 | 21 September 2024    | Ko Lin<br>(Pseudonym) | A current local experienced legal worker  |
| 4. | Respondent-4 | 21st September, 2024 | Anonymous             | A local advocate having experienced more than ten years.                                      |
| 5. | Respondent-5 | 28th September, 2024 | Anonymous             | A local female Journalist   |



## II. A Comparison: ULA Vs Junta Justice Systems

### A. The ULA Judicial System as an Alternative to Junta Courts

Following the military coup on February 1, 2021, the Arakan region experienced a uniquely stable political environment compared to other parts of Myanmar, where violence and unrest were widespread. In Arakan, the ULA capitalized the relative stability to strengthen its governance structures, particularly its judiciary mechanism. This led to a situation where the ULA operated a parallel judiciary system in northern and central Arakan, presenting an alternative to the junta's courts.

During the post-coup period, while the junta focused on oppression over opposition elsewhere, the ULA established de facto control over large parts of northern Arakan<sup>31</sup>. Through the initial ceasefire period with the junta regime, by August 2021, the ULA had taken significant steps to manage judicial and administrative affairs under its control, calling on residents to report criminal incidents directly to its courts. Unlike the junta's judiciary, which Naypyidaw's justice system is well-known for corruption and inefficiency<sup>32</sup>, the ULA introduced a system designed to be more responsive to the needs of the local population. The ULA's formal announcement over the plans to accept complaints through various social media platforms, including email, Telegram, and VKontakte (VK) on August 1, 2021. This system allows citizens to seek redress for a variety of grievances, including land disputes, theft, and violent crime.<sup>33</sup>

As part of this initiative, U Khaing Thukha, spokesperson for the AA, emphasized that *"the goal was to deliver justice for the people of Arakan State."*<sup>34</sup> Nevertheless, it is still difficult to define when exactly the ULA's justice system started. Initially, even before the 'first' de facto ceasefire in November 2020, the ULA/AA officials in the rural and mountainous areas initiated a kind of highly informal dispute resolution task as they already had de facto control in the territory. These areas principally include the Paletwa township in southern Chin state and central Arakan townships such as Kyauktaw, Mrauk-U, Minbya and Rathedaung<sup>35</sup>.

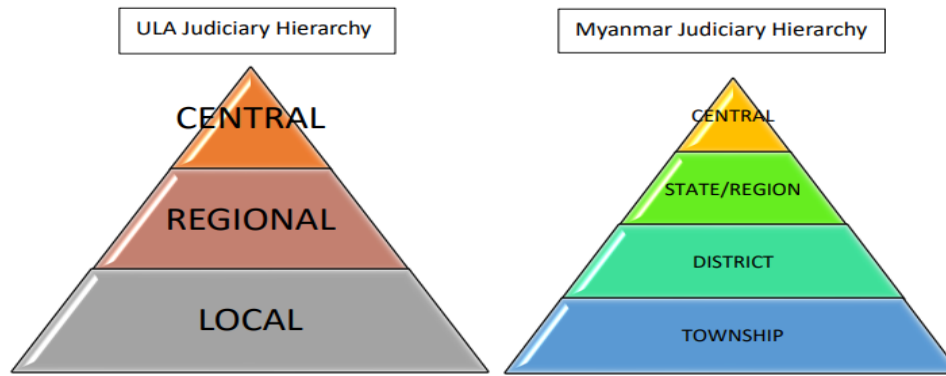
However, the appearance of the ULA-led judicial system became more visible when the AA introduced a ceasefire in late 2020 with the Myanmar military. The ULA leadership began setting up of the courts, recruiting and appointing judges and staff, and finally, announcing and mobilizing the local population to join the judicial services. Gradually, the ULA's justice system due to its nationalist popular political movement enjoyed more recognition and acceptance. On another front, the ULA-courts have been extended into more townships in the region like Myebon, Pauktaw, Ann, Kyaukphyu, Rambree and even southern Taungup<sup>36</sup>. In February 2022, just one year after the de facto ceasefire, one source mentioned that the extension of the ULA-justice system became widespread and intensive, nearly 80 percent of all judicial disputes being resolved at the ULA-court.<sup>37</sup>

### B. Key Characteristics

There are both similarities and differences between the two parallel justice systems in Rakhine state. Starting with the difference, while Myanmar's judiciary system has four layers, the ULA has only three. Ko Min, who has a master's degree in international law, and has been working as a legal consultant for several CSOs, expressed the difference.

*"There is a difference in the levels of courts between the two systems, noting that 'there is a slight difference in the levels of courts, such as Local (နယ်မြေ/တိုက်နယ်) and Regional (ဒေသ) courts in the ULA/AA's judiciary system, while Myanmar's judiciary comprises Township courts, District courts, State courts, and High courts."*

This structural divergent between the two authorities can be seen as the following.



These different judicial layers also seem to have diverse impacts on the local population, and it was expressed by one of the interviewees, Ko Han, currently working as a legal advocate, as the following.

*“A key strength of the ULA judiciary is its accessibility, especially for people in remote areas. Unlike Myanmar’s government judicial system, which typically operates one court per township, the ULA’s system is organized by local districts, making it more accessible to the population.”*

The region defined by the ULA authority is different from the township of the Myanmar government’s structures because the region of the ULA is mainly structured based on the military zones designed for the military operation depending on the geographical landscape. For instance, local sources state that a military zone can include more than one township, and thus, there could be several local courts in each military or administrative zone.

Even if the judiciary structures of the two authorities are virtually different, there are also many other similar areas. The ULA continues to apply certain elements of Burma’s legal system, including common laws, despite having its own constitutional framework. These include the applications of the existing law or legal system by the ULA courts and judges in the ULA court being the ex-judges from the SAC or lawyers from the SAC courts. Firstly, to start with the legal system, the situation was explained by one legal expert:

*“The legal system of the ULA/AA is built on a combination of the Myanmar legal system, British colonial law, and post-independence statutes, all aligned with the local context of Rakhine. This legal framework can be applied depending on the situation and includes various laws such as the Penal Code, military law, and civil law. The ULA/AA’s legal system is organized to address a range of legal issues at different levels, including district and regional courts.”* <sup>38</sup>

Yet, there are exceptions. Some sources mentioned that the ULA courts deactivated some laws such as the law on the practice of Monogamy, while still upholding customary laws within its judiciary. In many cases, the judiciary affairs of the Rohingya Muslim community are also delegated to the respective community leaders. In short, the Legal system of the ULA is based on the combination of Myanmar legal system, British Colonial Law and post-independence statutes aligned with the local contexts of Rakhine. The legal framework may be applied depending on the situations such as the Penal Code, the Military law and Civil law. The ULA legal system is structured to address various legal issues at different levels such as local and regional courts.

While Myanmar’s legal system possesses foundational strengths, it grapples with challenges related to functioning and judicial independence. New laws, such as the Peaceful Assembly and Peaceful Procession Law (the PAPP Law) and the Counter Terrorism Law, reflect the priorities and control of the military rather than purely legal considerations, making these laws somewhat exceptional.

The ULA/AA has established a fundamental judicial law that governs its judicial system. However, the Penal Code and the Code of Criminal Procedure are largely based on the Myanmar legal system. In terms of sentencing practices, there have been adjustments; for example, Section 326 of the Penal Code sets a prison term of three to four years for certain crimes. Yet, during the current transitional period of the ULA/AA’s judiciary system, leniency in sentencing has occurred due to a need for prison space, leading to modifications in alignment with prison regulations and guidelines.

Also, according to the report from Center for Operational Analysis and Research (CORA), in Thandwe Township, a Kaman woman mentioned hearing that the ULA/AA was enforcing laws such as the Myanmar Penal

Code, Myanmar cultural law, Christian religious law, and Islamic Sharia law. For cases involving children, they reportedly refer to the 2019 Child Rights and Child Protection Law<sup>39</sup>.

### C. Quality Perspectives

The comparative analysis of the difference between the two justice systems should also focus on the quality perspectives of the judiciary system. These criteria include accessibility, affordability and effectiveness. Firstly, for the question of accessibility, even if the ULA is more positively viewed, diverse perspectives still exist. For instance, a legal consultant named Ko Min said,

*“Most of the courts are currently located in hard-to-reach areas, so the courts should be easily accessible to the public. The danger of airstrikes in the current situation is also considerable, but it would be helpful for the public if the legal complaints department can be provided.”<sup>40</sup>*

His perspective is also shared by another interview participant, Ko Lin, when he said.

*“Before the operation 1027, most of ULA/AA’s courts were built in hard-to-reach areas, so there were limitations for the people to be able to access the physical courts in terms of expensive transportation cost. The physical appearances of the courts and infrastructure were also needed to reorganize and decorate”<sup>41</sup>*

Other sources also stated that the ULA courts are mostly established in rural areas where they can protect from the targeted artillery shelling or air strikes or surprised siege by the junta. Indeed, in many cases, especially in the southern townships like Taungup and Rambree, the junta soldiers often attempted to capture the judges and officials from the ULA courts. However, like one participant expressed, the locals are more accessible to the ULA courts because the local level courts have been established where it is more known and reachable to the rural population unlike the SAC who has only one court in the urban center.

Second, when it comes to the criteria of the affordability, there is a common agreement that the ULA courts are less expensive than the SAC. In line with one account, he said that the ULA judiciary is more affordable because Myanmar's courts are often plagued by high legal fees and corruption whereas the ULA provides free legal consultants and lawyers for those in need, improving access to justice for underprivileged communities. This is also rightly pointed out by the legal consultant Ko Min that the public feel a lack of trust in the judiciary system of the junta because they mostly believe if they give bribe money, they will prevail in the case. Besides, there is another reason why the ULA courts are considered to be less expensive, which is the high hiring cost of lawyer fees which is a limitation for the public to afford the justice system. A legal advocate Ko Han pointed out;

*“In the ULA/AA’s judiciary system, the government provides free lawyers, free legal consultants for those who cannot afford it, making the judicial system more accessible and affordable for the people.”<sup>42</sup>*

However, the ULA judiciary system is also far from perfect. In some cases, based on the locations of the local and regional courts, the clients need to travel from a faraway location to reach the courts. Not only that, unlike the urban centers, the villages where the courts are located have less space for the clients to stay for many days. In this case, this also leads to constraints on the questions of affordability and accessibility.

More importantly, the cases and issues arriving before the ULA’s judiciary courts are the ones that the people in those cases are not acceptable to the junta’s adjudication. According to the local views and observations, the junta’s judiciary is often viewed with skepticism, particularly in Rakhine State, due to its historical association with corruption and its failure to represent local interests. The judicial system, particularly the ULA's judiciary, has gained significant favor among residents of Rakhine State, who have long been disillusioned with corruption, bias, and inefficiency in the centrally controlled judiciary. Cases that previously could take a year or more to resolve, often requiring hefty bribes and fees, are now being settled in as little as a month and at minimal expense through the ULA's system.<sup>43</sup> Besides that, the local people feel a lack of trust in the judiciary system of the junta because they believe bribery is key to winning a case.

Regarding that, a key theme that emerged from interviews is the public's comparative trust in the ULA/AA’s judiciary system. One respondent Ko Min noted on 11 September 2024,

*“When it comes to the ULA/AA’s judiciary system, although there might be some weakness, mostly the public can achieve justice rather than in the junta’s judiciary system.”<sup>44</sup>*

This sentiment underscores how public perceptions of fairness and justice are central to the legitimacy of the ULA judiciary. By contrast, the ULA’s system, despite some weaknesses, is generally perceived to deliver justice more effectively.<sup>1</sup> This reflects a common public sentiment that, although the ULA’s judiciary is still developing, it holds greater legitimacy in the eyes of many compared to the junta’s system.

In addition to these three criteria, if the quality of the justice system is also to be determined by other two critical factors such as the quality of human resources and availability of material resources, many critics point out that the ULA is falling behind the SAC. These issues also reflect experience and capacity of the judges and staff working in the office and physical appearance of the court environment. Regarding the question of human resources, sources state that the ULA has no salary payment system apart from providing basic costs for judges and staff serving at the court system. Besides, as the judiciary system of the ULA is still young compared to the SAC, one interview participant pointed out;

*“Although Myanmar’s judiciary system is corrupted, they have well-trained and resourceful legal professionals. When the individuals, lacking a legal background, are trained in short legal course training and they are appointed for legal roles, I am doubtful and wonder about their functioning for ensuring absolute justice.”<sup>45</sup>*

Indeed, another participant rightly pointed out that even if the ULA has now controlled more territory and the challenges for the court system is broad. He said even if the ULA can expand its courts, the judicial system still needs to develop the capacity of legal personnels, the quality and capacity of police forces, and individual civil servants. In many cases, it is not just about the quality of the judges and staff, but the quantity factor also matters. As one participant pointed out that there are still limitations in human resources because the former lawyers have to serve as the judges in the ULA’s courts due to the shortage of well-trained and resourceful legal personnel and when the lawyers act as the judges due to the requirement, there might be some weakness in the judicial process.

For the question of the material availability, another interview Ko Min mentioned that the physical appearances of the court also need to be perceived of its dignity and professionalism in order to maintain the perception of the public toward the courts as respectful and impressive place.

In short, since the formation of the ULA justice system by accepting complaints via email, VKontakte (VK), and Telegram while safeguarding personal information, the AA’s judiciary aims to address various cases including violence, theft, and land disputes. This initiative has garnered local support and positioned the AA as a potential stabilizing force, promoting transparency and accountability within the ULA/AA. Judicial offices under AA control are now operational in the Arakan region, offering an alternative to the military courts of the junta, which are less trusted by locals<sup>46</sup>

### III. Enforcement Power and Political Independence

#### A. Enforcement Power

Law enforcement plays a crucial role in the judiciary system by maintaining public order, enforcing laws, and ensuring that judicial decisions are carried out. It prevents crime, investigates violations, and ensures that court rulings are respected and followed. Without law enforcement, the judiciary would lack the practical means to implement its decisions, leading to a breakdown in the rule of law. Additionally, law enforcement is responsible for gathering and preserving evidence, which is vital for fair trials and ensuring justice. It also protects the rights of individuals during criminal investigations and arrests, ensuring that the legal process is conducted fairly. Therefore, effective law enforcement is essential for a functional judiciary and a just society.

Since the time of creating the judiciary system, ULA has had a unique goal differing from the current junta judiciary system with the ultimate perspectives of justice and peace in the region. To achieve it, The ULA introduced a judiciary law that created a distinct Justice Department, separate from the military-controlled judicial system of Myanmar. Courts have been set up at both the village-tract and district levels, where individuals violating ULA laws are prosecuted within this new legal framework<sup>47</sup>. This effort to establish a parallel legal system under ULA administration coincides with the ongoing informal ceasefire between the military and the AA. In the first three months of 2022, the ULA's judiciary received 1,845 cases, of which 1,026 were resolved by April of the same year. In 2021, the ULA had reported receiving 3,838 cases, out of which approximately 1,900 had been successfully resolved<sup>48</sup>. A resident of Ponnagyun township who filed a case with a ULA court shared with RFA that the ULA-administered courts resolve cases more efficiently than government courts, which are frequently plagued by delays.<sup>49</sup>

However, on the other hand, a report from Development Media Group (DMG) mentioned that the judiciary department has yet to address over 2,500 complaints submitted since 2022. The ULA's judiciary department was unable to resolve 2,882 cases, including 999 criminal and 1,883 civil cases. By the end of September this year, an additional 3,112 complaints had been filed, bringing the total to 5,994. Of these, the judiciary department has resolved 3,442 cases, leaving 2,572 complaints still pending. This includes 850 criminal and 1,722 civil cases, with civil cases naturally taking longer to resolve, according to Justice for Arakan, the ULA's judiciary Facebook page.<sup>50</sup>

For examining the rule of law and enforcement, the public from Rakhine is highly welcoming over the ULA/AA's jurisdiction compared to junta's which has a lot of requirements with corruption, bribery under power abuses. For those affairs, U Khaing Kaung San from the Wan Lark Foundation stressed the importance of establishing a platform for residents of Rakhine State to seek justice in a report by *Frontier Myanmar*. He then highlighted the shortcomings of the regime's judiciary and law enforcement in several townships within the region. In the same report, U Pe Than of the Arakan National Party noted that the ULA's administrative systems were proving more effective than those of the regime's council, signaling a restoration of the rule of law after conflicts with the military<sup>51</sup>.

Again, Ma Su Mrat Htwe of the Rambree Youth Network added that, under the AA's expanded administrative control and public services, residents increasingly trusted and relied on the ULA even before the recent election. However, she expressed concerns about potential abuses of power by ULA/AA members at the local level, stressing the need for accountability as ULA's governance gains legitimacy in the region<sup>52</sup>. Likewise, besides those public trusts in the ULA's justice system, there are still gaps in the system to be developed. Those gaps created the noises and criticisms towards it among the local people through the years of implementation.

One of the main gaps is its structures as mentioned. Although there has been significant progress in improving the capacity of legal professionals and resourceful individuals; however, there is still a need to address structural weaknesses. To address gaps in the legal profession, the ULA has initiated legal training programs, particularly targeting young people. A 2022 report from BNI highlighted that the ULA's legal project combines inexperience with public goodwill, acknowledging that mistakes are likely as the system develops.<sup>53</sup>

An Arakanese lawyer familiar with the ULA explained that many participants in the legal system have received only limited pre-training. Although the ULA has included middle-aged individuals in its administration and judiciary, there remains a clear need for more educated and capable youth. The ULA spokesperson confirmed that efforts are underway to provide legal education, though the participation of well-educated individuals still falls short of the organization's goals.<sup>54</sup>



The other gap found out in this research is that the locations of the ULA/AA's courts are hard to reach areas so that one of our interview respondents grabbed a fact that;

*“Prior to the operation, many of the ULA/AA's courts were located in hard-to-reach areas, which limited access for the public due to the high cost of transportation. Additionally, the physical condition and infrastructure of the courts require reorganization and enhancement.”*

There is also an interesting important factor to consider whether the routine outbreak of the armed clashes, for instance between August and November of 2022 had an impact on the regulation and enforcement power of the ULA judiciary. Some interview sources stated that the outbreak of armed clashes had no meaningful impact on the regulation of the judiciary system, but other sources mentioned differently. In March 2022, the VOA (Burmese) stated that the ULA-led judiciary regulations had to be postponed due to the raids of the junta military column in the townships like Kyaukphyu, Rambree and Taungup where the AA had less domination. One local resident said.

*“Mostly, we have to say the southern part of Rakhine State. Places with less ULA/AA influence such as Taungup, Rambree, Kyaukphyu, etc. There are ULA administrative courts there, but when this side is not yet influenced militarily, it is for the SAC to control the villages with their influence to check are there any offices form ULA courts and inspections? After opening the ULA-courts, when I heard that the SAC side was doing it, they visited the villages where the ULA courts were located and searched, and that's why the courts were unable to operate there normally.”<sup>55</sup>* Quite obviously, therefore, there is a reason to believe that the ULA courts could be impacted by the outbreak of the armed clashes.

## B. Political Independence

The political independence of the judiciary is critical to ensuring that legal decisions are made based on law, not political pressure or influence. When a judiciary is independent, it can act as a check on government power, protecting citizens' rights and upholding the rule of law. Without independence, the judiciary risks becoming a tool of those in power, leading to biased rulings, corruption, and the erosion of public trust. A politically independent judiciary is essential for fairness, accountability, and maintaining a healthy political system.

In discussing the ULA's judiciary during an interview at an international news, ULA leader Twan Mrat Naing emphasized the importance of establishing a credible legal framework as part of their governance strategy. When asked about the ULA's judicial presence, a representative noted,

*“We have our own police force. If you have credibility among the people, you must have a judicial system. You have to resolve their conflicts in a fair and just manner. That is our experience.”*

This underscores the ULA's belief that a functioning and trustworthy judiciary is essential for maintaining legitimacy and resolving disputes within the community, even though their authority does not yet extend to all parts of Arakan<sup>56</sup>. Local sources mentioned that the current chief of justice in the ULA judiciary system is appointed by the ULA leadership and the appointment of the other judges at the regional and local levels is proposed by the chief of justice but required the confirmation of the ULA leadership. One interview participant mentioned that the cases can be filed directly in the courts, and the judiciary and decisions are solely carried out by the judges, so it can be said that the ULA/AA's political control does not intervene in the judicial process. But there are still some exceptions as mentioned by one interview participant.

*“The cases of people who were arrested by the AA which aren't related with the judiciary system, because it was carried out under their martial principles. Since most cases filed to the courts were ruled by the respective judges, the judiciary system is away from the intervention of political control.”<sup>57</sup>*

Indeed, the majority of the research participants mentioned that the ULA justice system has enough autonomy to make its own decisions with a few exceptions. As mentioned by one CSO leader, it can be said the judiciary system is quite independent from political control, as he has learned, the judges have utmost authority in decision making in the filed cases. But he has found some bias cases when it comes to favoritism or nepotism related issues which means the judicial process is sometimes influenced by the self-interested individual rather than the political. Likewise with observations and findings from CAS's interviews, Myanmar Now reported on that matter during its interviews with locals. It expressed that a resident of Minbya Township speculated that the recent introduction of a public complaint

mechanism by the ULA/AA may be an effort to address internal corruption. He linked the decision to social media posts where locals from Minbya and Mrauk-U townships urged the chairman of the ULA, Maj-Gen Twan Mrat Naing to investigate abuses of power by some members of the organization. Similarly, a villager from Buthidaung township suggested that previous local grievances likely prompted the new system. The villager expressed hope that the move would foster greater respect and trust within the community<sup>58</sup>.

It also implies, beyond the political control over the judiciary, the partial decisions taken by the judges' impact on the justice system. Indeed, one interviewee mentioned that the only concern is that if individual legal professionals are not able to throw away negative mindsets and behaviors which had developed in the corrupted system of the SAC, it would be very harmful to our community.<sup>59</sup> Quite interestingly, a legal expert pointed out that it can be said that the judiciary system is quite independent from political control when solving the people to people disputes, and personal conflicts. But, he said;

*“When the civil servant from the ULA/AA commits an offense against the civilian, the victim's family has not yet directly filed the cases to the courts. Although we have known that crimes of civil servants were punished by the AA which was announced in the ULA/AA press conference, it's difficult to say that the judiciary system is completely independent from political control in disputes between the civilian and the civil servants.”<sup>60</sup>*

This statement clearly means that the ULA justice system is not completely neutral when it comes to the relations between the state or civil servants and the civilians. This is a kind of indirect political control in absolute sense. The comparison between the judiciary systems of the junta and the ULA/AA reveals distinct strengths, weaknesses, opportunities, and challenges for each. The junta's judiciary is well-structured and organized, featuring experienced legal professionals, which facilitates legal proceedings. However, it is heavily influenced by the military, leading to widespread corruption and a lack of public trust, compounded by limited territorial control in recent times.

In contrast, the ULA/AA judiciary, while emerging within a few years, has improved accessibility for civilians in Rakhine State, particularly after gaining territorial control. It operates with a degree of independence from political influence, allowing for more impartial decisions.

## IV. Public Perception and Minorities in the ULA Courts

Among the three branches of the government, the judges in the judiciary branch are not mostly popular elected officials. They are mainly appointed by the presidents or prime ministers or kings or other heads of government based on the political system. But, being a critical pillar of the political system, it is very important that the justice system in a country or in a region achieves public trust and recognition if the decisions taken by the judges are to be considered justice.

### A. Public Perception

Public perception of the justice system is critical because it directly influences trust in the rule of law, the legitimacy of legal institutions, and societal stability. When people believe the justice system is fair, transparent, and impartial, they are more likely to comply with laws, cooperate with law enforcement, and seek legal redress for grievances. On the other hand, a negative perception – due to corruption, bias, or inefficiency – can lead to distrust, reluctance to engage with the system, and increased social unrest. Public confidence strengthens democracy and the overall functioning of justice.

As the junta's influence in central and northern Arakan has diminished, the ULA/AA judiciary has expanded its operations, becoming a key player in local governance, particularly in the cases of jurisdiction factors. This alternative legal system functions in direct competition with the junta's judiciary, which struggles to maintain legitimacy in the eyes of many locals. In many areas, the AA's judiciary has replaced the junta's courts as the primary institution for resolving disputes and delivering justice.<sup>61</sup> Regarding with the justice system developed by the ULA/AA, one of the interviewees, a local male resident, an experienced legal consultant at CSOs discussed his opinion.

*“The ULA/AA's establishment of the judiciary system in Rakhine State is a step forward ... .In terms of justice, the results of ULA/AA's judiciary system is much more satisfactory than the SAC.”* <sup>62</sup>

Quite interestingly, one participant named Ko Han sees the judiciary system as a part of nation-building. He said that he personally welcomed the establishment of the judiciary system in Rakhine, and he also believes it's a step forward action by the ULA/AA in its nation building process. Others pointed out that territorial control is crucial in the judiciary system of ULA/AA because of the public accessibility to the courts. It is a similar idea as discussed in a report from Transnational Institute (TNI), where author expressed the idea of state building where judiciary is one of the key steps that ULA/AA has already explored<sup>63</sup>. A local legal advocate having experiences more than ten years pointed out some exceptions in public perception as;

*“Victims' families often hesitate to file complaints against civil servants from ULA/AA, reflecting a potential reluctance to engage with a system that may not fully safeguard against political interference.”* <sup>64</sup>

This suggests that, in instances where the judiciary should hold civil servants accountable, the influence of political control is more pronounced. A Legal expert mentioned that a system for mutual control (check & balance) within the organization is necessary. Additionally, it is essential to have criminal investigative scientific techniques and principles. There is a need to enhance the quality and capacity of legal professionals. When necessary, it is important to seek advice and collaborate with legal experts both domestically and internationally. Most importantly, the judicial system needs to be based on evidence and systematic investigations rather than solely on human-centered policies. Like he mentioned again, the ULA judiciary system needs to apply Forensic Science including Forensic Biology, Forensic Chemistry, Forensic Pathology and Forensic Toxicology to enhance the accuracy of investigations, improve the quality of evidence presented in court, and support the pursuit of justice.”<sup>65</sup>

### B. Minorities under the ULA Courts

In addition to issues of independence, fairness among the diverse ethnic groups residing in the Arakan region is a critical consideration. In addition to the two dominant groups, Rakhine and Rohingya, eight other ethnic and religious groups – Chin, Daingnet, Hindus, Kaman, Khumei, Maramagyi, Mro, and Thet – coexist within the region<sup>66</sup>. It is essential that all residents, including double minority groups (DMGs), as well as Rakhine and non-Rakhine

individuals, have equal opportunities within the ULA's judiciary system. A report from TNI expressed that at present, the ULA judiciary's impartiality, decisiveness, and focus on delivering results have generally been well-received by minority communities, including the Rohingya, in areas under its authority.<sup>67</sup> This research indicates that, in comparison to the junta's justice system, these residents experience greater fairness and access under the ULA's framework. A female journalist noted on September 28, 2024:

*"As observed, the ULA/AA's judiciary system is currently functioning with minimal discrimination against the local population, including Muslim communities, who now have access to the courts to file cases. This development marks a significant improvement in inclusivity within the judicial process compared to previous systems."*<sup>68</sup>

It is a really great human right initiative and all-inclusiveness strategy conducted by ULA/AA since the Muslims were not eligible to file the cases in the Myanmar Judiciary system but can file to ULA/AA. Like in a pivotal 2020 speech, the chairman of the ULA outlined his vision for the "Arakan Dream," a framework centered on inclusivity and equality. He asserted, "All peoples in Arakan, without any discrimination, shall be equally treated. We are fighting for freedom, democracy, social justice and welfare, and human dignity for all inhabitants in Arakan irrespective of religion, race or sex."<sup>69</sup> This declaration not only underscores a commitment to rectify past injustices faced by DMGs under junta or historical periods but also seeks to cultivate unity among the region's diverse communities. The ideals set forth in this vision serve as a guiding beacon for the ULA's judiciary, influencing its approach to justice and its relationship with the local populace.

In the report from CORA, a Rohingya man from Sittwe Township expressed his personal experiences and thoughts during an interview.

*"Our villagers prefer the ULA's judicial system. Initially, we attempted to resolve issues within our village, but the APA representatives instructed us to bring unresolved disputes to them."*

The judiciary is further supported by a diverse police force, which reportedly includes members from the Rohingya community. However, while the emphasis on local structures may be intended to be sensitive to Rohingya and other Muslim communities, it also risks formalizing problematic practices that could adversely affect women and girls<sup>70</sup>. Then, the head of Arakan People Authority (APA) village administration committee from Sittwe commented on the fair resolutions of AA towards issues and disputes<sup>71</sup>. Ko Han from our interview respondents also mentioned that; *"Although we could hear public criticism in other sectors, I didn't acknowledge of discrimination by the ULA/AA judiciary system in terms of problem solving at courts towards non-Rakhine communities."*<sup>72</sup>

Besides, one report from CORA highlighted that in areas where the ULA/AA has a strong presence, the SAC's judicial system becomes inaccessible. A Rohingya man from Maungdaw township shared; *"We don't have the option to complain wherever we like. In Buthidaung, many Rohingya are fearful of the AA and only approach the ULA for assistance. In those regions, the police have been largely inactive since last year, leaving only APA members to resolve disputes."*<sup>73</sup>

So, it is likely to have limited choices between the two jurisdictions and cannot account for comparisons between junta and ULA approaches of justices. For locally resolved cases, ULA administrators and committees participate in the decision-making process, while more serious or sensitive cases are escalated to higher levels where independent judges preside. This approach reflects the ULA's emphasis on utilizing existing and traditional dispute resolution methods<sup>74</sup>. On the other side, in Rohingya villages, community elders or religious leaders, who may or may not include Arakan People Authority (APA) members, are permitted to handle village-level criminal and civil disputes, including marriage issues. Only when these leaders are unable to resolve a case is it referred to higher ULA/AA officials or judges. A similar judicial framework exists within other minority communities.<sup>75</sup> In certain areas, the ULA's judicial system is only one of several avenues for seeking justice. For instance, a Kaman woman in an internment camp in Pauktaw Township highlighted the various options available:

*"For family matters, we consult religious leaders, while general disputes are addressed with the Camp Management Committee. Sometimes, we escalate issues to the village tract administrators appointed by the ULA/AA. For criminal cases, we approach the police, as the ULA/AA is not very active in our area, and their processes tend to take longer than those of the police."*<sup>76</sup>

## V. Critiques over the ULA Judiciary System

### A. General Critiques

The ULA/AA judiciary system, established approximately four years ago, has made significant strides in providing an alternative to the long-standing junta judiciary. However, it still faces notable challenges that reflect its relative immaturity compared to the entrenched judicial system in Myanmar. One key challenge is the institutional maturity as the judiciary system is still young. The second problem stems from the limitation of human resources. Critics mentioned that sometimes, the ULA appoints individuals lacking a legal background, after short legal course training, which raises doubts about their ability to ensure effective justice. They remarked that even if the higher courts are staffed with trained individuals, local courts often suffer from minimal legal expertise, leading to poor case management. One weakness indeed comes from the fact that lawyers serving as judges, due to a shortage of specialized judges, can lead to biases and inconsistencies in case handling.

Cases like corruption and favoritism stand as the third challenges of the ULA judiciary system. As revealed by the findings, while the ULA/AA judiciary has largely maintained independence from political influences, there are instances where bribery, nepotism and favoritism has compromised impartiality in judicial decisions. This was also reported in the news of local newsroom, Development Media Group in 2023 that there were voices about bribery and nepotism, where it highlighted the low-level staffs' power abuses<sup>27</sup>. Indeed, these kinds of unhelpful practices in the ULA courts actually stem from the entrenched corrupted Myanmar judiciary system and this directly challenges the legitimacy of the court system.

Beyond these challenges, the insufficiency of the material resources also creates barriers in the ULA justice system. In some sensitive cases like rape and murder, the judiciary investigation and police forces lack modernized tools and techniques such as criminal investigative science and forensic methods that could enhance the quality and objectivity of the evidence used in trial. In addition, the lack of enough material resources poses a problem when the court and prison buildings are poorly structured and constructed.

The ULA/AA's judiciary faces several challenges that may hinder its effectiveness and credibility. One notable issue is the potential dissatisfaction of plaintiffs, particularly in cases where sentencing does not align with public expectations. For instance, under Section 326 of the Penal Code, criminals may receive lighter sentences, such as one or two years in prison, even though the law prescribes three to four years for these serious crimes. Sources mentioned that the key reason why the ULA courts shorten the prison sentence is because of the lack of enough resources and facilities to burden a large number of prisoners. As a respondent noted, this could lead plaintiffs to perceive the judiciary as biased or too lenient, especially if they are unsatisfied with the outcome. This highlights a need for greater public awareness and education about the ULA/AA's legal principles and sentencing guidelines to foster understanding and trust in the system.

There is a need for structural reforms and modernization to strengthen public trust in the judiciary. As the ULA/AA continues to expand its judicial framework, addressing these challenges will be essential for establishing a robust, independent, and effective legal system.

### B. Case Studies

Several high-profile cases have emerged under the ULA/AA's judiciary, providing critical insights into governance and law enforcement in the region. These cases offer valuable opportunities to assess public perception of the newly established justice system and to examine how human rights are being prioritized. By analyzing these cases, we can better understand the effectiveness of the ULA/AA's judiciary and the level of public trust it garners in comparison to previous systems. Three cases will be described and examined as the following.



## B.1. First Case Study

|                    |                                     |
|--------------------|-------------------------------------|
| <b>Case Number</b> | <b>I</b>                            |
| <b>Location</b>    | <b>Mrauk-U</b>                      |
| <b>Date</b>        | <b>March 2022</b>                   |
| <b>Title</b>       | <b>The Death of U Maung Gyi Hla</b> |

### Incident Overview

On March 30, 2022, U Maung Gyi Hla, a resident of Myothit Ward in Mrauk-U, died in custody while being interrogated by the United League of Arakan/Arakan Army (ULA/AA). His family discovered his body in Mrauk-U Hospital, which bore extensive bruises and injuries, raising immediate concerns over the circumstances of his death. They expressed their dissatisfaction with the treatment he received and accused the ULA/AA of mistreatment during interrogation, later sharing a video on social media to highlight their grievances.<sup>78</sup>

### Public Reaction and Accountability

The incident sparked significant public outrage, leading to widespread demands for accountability regarding ULA's judicial practices. At a press conference on April 5, ULA/AA spokesman Khine Thu Kha stated that U Maung Gyi Hla was being investigated for involvement in a murder and corpse disposal case. He stated. *"U Maung Gyi Hla was a member of the AAA (Arakan Army Auxiliary) Group. He was being interrogated regarding a case of murder and corpse disposal. Unfortunately, during his detention, he passed away due to an accidental incident. We express our condolences to the family. He was suffering from diabetes, hepatitis, and kidney disease. The officers handling the interrogation were unaware of his medical conditions and used rough methods, which contributed to his death."*<sup>79</sup>

However, this assertion was vehemently contested by U Maung Gyi Hla's daughter, who maintained that her father had no prior health issues and questioned the legitimacy of the ULA/AA's explanation. Two officers involved in the interrogation were detained, and Khine Thu Kha assured them that they would face appropriate punishment for their actions<sup>80</sup>. However, U Maung Gyi Hla's daughter refuted the ULA/AA's claims about her father's health, stating; *"My father had no underlying health conditions. We don't know how he could have developed these diseases in just one week of detention. The injuries he sustained raise serious questions, and we no longer trust their explanation."*<sup>81</sup>

### Family's Struggle for Justice

ULA's spokesperson, Khine Thu Kha also indicated that U Maung Gyi Hla had been transferred to the hospital due to complications from his alleged medical conditions. In contrast, the family claimed they were uninformed about this transfer, only discovering his death upon searching for him at the hospital<sup>82</sup>. In response to criticisms, the ULA/AA reiterated their stance against corruption and abuse of power within their judiciary and governance systems, stating during the press conference that any allegations of misconduct should be reported with full evidence for thorough investigation. However, their experience points to a profound lack of communication and transparency from the ULA/AA regarding detention and medical treatment, exacerbating the family's grief and frustration.

### Calls for Transparency and Accountability

As of August 12, 2023, the family continues to seek a fair investigation into U Maung Gyi Hla's death. They report feeling dissatisfied with the ULA/AA's responses, stating that justice has yet to be served. While ULA/AA representatives have acknowledged the detention of two officers involved in the interrogation, details regarding their accountability remain unclear. Family members expressed their anguish, stating that the true culprits are still at large, and emphasized their demand for transparency in the judicial process<sup>83</sup>. On August 11, during another press conference,

the ULA/AA again failed to provide clear answers regarding actions taken in connection with U Maung Gyi Hla's death, further deepening the family's distrust and concern about the integrity of the judicial system<sup>84</sup>.

One family member stated; *"We don't know what actions have been taken. They say they are addressing it, but the real murderers remain free while someone innocent has lost their life. It's truly heartbreaking. If they are taking action regarding his death, we want justice for our family."*<sup>85</sup>

## Human Rights Perspective

The case has drawn scrutiny from human rights advocates, including Director U Myat Htun of the Rakhine Human Rights Protection Group, who criticized the ULA's practices, asserting that no organization should engage in coercive methods that violate human rights. The ULA/AA has reiterated its commitment to address corruption and abuse of power within its governance and judicial systems. Khine Thu Kha claimed an increase in complaints to the ULA/AA's judiciary departments indicates a shift toward transparency; however, the lack of concrete actions and accountability in high-profile cases like U Maung Gyi Hla's raises concerns about the actual effectiveness of these claims.<sup>86</sup>

The ULA/AA has reiterated its commitment to combating corruption and abuse of power within its judiciary and governance systems, stating that if evidence of wrongdoing is provided, they will take appropriate actions. Khine Thu Kha mentioned during the August 11 press conference that there has been an increase in complaints filed with the judiciary departments of ULA/AA, indicating a shift towards a more transparent judicial process.

## B.2. Second Case Study

|                    |   |
|--------------------|---|
| <b>Case Number</b> | <b>II</b>                               |
| <b>Location</b>    | <b>Sittwe</b>                           |
| <b>Date</b>        | <b>July 2022</b>                        |
| <b>Title</b>       | <b>The Murder of Ma Nwe Thandar Win</b> |

### Incident Overview

On July 15, 2022, the city of Sittwe was shaken by the brutal murder of 18-year-old Ma Nwe Thandar Win. Employed at the "Luminous" shop in Sittwe's busy Mingang Ward, she was found dead with knife wounds, sparking public outrage and concerns over safety. Witnesses, including her grandfather and the medical examiner, confirmed that she had likely died around 2:00 PM, though her body was not discovered until later that evening. The incident occurred in a high-traffic area near government offices, raising questions about local law enforcement's effectiveness and exacerbating existing fears in a region already affected by instability<sup>87</sup>.

### Impact on Public Safety Perception in Initial Situations

This case, coupled with a series of thefts and robberies, exposed gaps in both the ULA/AA and junta-administered law enforcement in Sittwe, undermining public confidence in the ability of either governing body to ensure security. The location and nature of the crime, close to significant government buildings, amplified concerns about lawlessness in the city, highlighting weaknesses in governance during times of conflict<sup>88</sup>.

### Investigation and Legal Proceedings

Following an initial investigation by local authorities, the case took a complex turn. While the SAC-controlled police were involved, local testimonies indicated a lack of thoroughness in the investigation. Initially arrested and charged with the murder of Nwe Thandar Win, Myo Chit Soe was acquitted after months of legal proceedings. His case sheds light on critical issues of governance, law enforcement, and the application of justice in Rakhine State.

According to the Western news' report on 27th January 2024, while the SAC accused Maung Myo Chit Soe of the crime, local testimonies, including those from defense and prosecution witnesses, unanimously declared his innocence. Despite these testimonies, his detainment and the allegations of mistreatment while in custody fueled skepticism and criticism regarding the fairness of the SAC-controlled legal system. Myo Chit Soe's family reported instances of physical and psychological abuse during the investigation, highlighting ongoing concerns about human rights violations under SAC jurisdiction<sup>89</sup>.

However, the ULA judiciary identified and prosecuted a different suspect, Myo Myint Zaw, the shop manager. On February 3, 2023, the ULA/AA court sentenced Myo Myint Zaw to death under Section 302(1)(g) of the Penal Code. This marked a pivotal moment in the ULA/AA's handling of criminal cases, as the trial's conclusion underscored its judicial capacity.<sup>90</sup> Despite the gravity of the sentence, Myo Myint Zaw was granted the right to appeal, demonstrating the ULA/AA's adherence to a legal process that includes provisions for appeals<sup>91</sup>. The divergence in suspects and ongoing investigations by the ULA demonstrate the complex interaction between the SAC and ULA-led judicial systems. In regions where both entities exert influence, public trust in justice often becomes a reflection of larger governance struggles.

This case could serve as a microcosm of broader trends in public perceptions of justice and governance in Rakhine State under the dual systems of the ULA/AA and the SAC. It illustrates both the possibilities and limitations of ULA/AA's judiciary in gaining public trust, especially where human rights and transparent law enforcement are concerned.

### Judiciary in the Public Eyes

This case is illustrative of the ULA/AA's growing role in judicial matters, particularly in cases of violent crime. The swift resolution and the rare application of the death penalty showcased its intention to assert control over law and order in Rakhine, in contrast to the perceived inefficacy of the junta-controlled legal system. Public responses to the sentencing have been largely supportive, with many seeing it as a step towards restoring justice and security in the region. However, the use of capital punishment by the ULA/AA also raises important questions about human rights and the long-term impact of such legal measures on public trust.

### Implications for the ULA Judiciary

This case demonstrates both the potential and the challenges faced by the ULA/AA judiciary. On one hand, it represents a significant effort by the ULA/AA to establish itself as a legitimate legal authority in Rakhine, handling severe criminal cases and offering a more accessible alternative to the SAC-administered courts. It is like gaining traction among Rakhine people, but at the same time, must ensure a fair, transparent process to build lasting public confidence. On the other hand, it underscores the importance of balancing justice with transparency and fairness, as the use of harsh penalties like the death sentence may have broader implications for public perception, particularly concerning human rights and the future of governance in Rakhine. However, based on that sentence and actions towards the perpetrator from ULA/AA, there are a lot of positive comments and feedback from the public supporting that jurisdiction to the murderer, achieving public trust and satisfaction from that case.

### B.3. Third Case Study

|                    |                                   |
|--------------------|-----------------------------------|
| <b>Case Number</b> | <b>III</b>                        |
| <b>Location</b>    | <b>Kyaukphyu</b>                  |
| <b>Date</b>        | <b>September 2023</b>             |
| <b>Title</b>       | <b>The Death of Ko Aung Naing</b> |

## Incident Overview

In September 2023, Ko Aung Naing, a 24-year-old resident of Kwe Tae Village, Kyaukphyu township, was arrested by the ULA police on suspicion of motorcycle theft. Along with two others, he was taken into custody by the ULA after a local shop owner reported the theft. Ko Aung Naing allegedly attempted to escape during detention and was beaten by ULA officers. Despite efforts by medical personnel to provide treatment, Ko Aung Naing succumbed to his injuries after collapsing in the early hours of the morning on September 5, 2023.<sup>92</sup>

Aung Naing's mother, Daw Thein Shwe Yee, stated that her son had multiple injuries, including head trauma, bruises on his chest, and severe beatings on his back and limbs. His abdomen also showed signs of surgery. *"I don't believe he died from mere discipline. The injuries don't match with a punishment; it seems like they deliberately beat him to death. I want justice for this case,"* she said.<sup>93</sup>

## Impact on Public Perception

The case has raised significant concerns about the ULA/AA's ability to adhere to fair legal practices, particularly regarding the treatment of detainees. While the ULA publicly acknowledged the death and promised to investigate the officers involved, the incident has sparked debate about the use of force within its legal system. Public responses were mixed: Ko Aung Naing's family expressed a desire for justice, stating that if their son was guilty of theft, he should have faced a lawful punishment rather than dying in custody. His father called for equal punishment for those responsible for his death, reflecting broader societal concerns about the accountability of the ULA police force.

This case has led to widespread concern among local communities, particularly regarding the treatment of detainees under the ULA/AA. One villager reflected; *"With these terrible incidents, we feel completely unsafe. There's no security for us at all. The authorities abuse their power, and these kinds of cases keep happening."* Such incidents raise significant questions about the transparency and accountability within the ULA judiciary, undermining public trust.<sup>94</sup>

This is not an isolated incident. In March 2022, a similar case occurred when U Maung Gyi Hla from Mrauk-U Township also died while being interrogated by the ULA/AA. As in Aung Naing's case, the ULA/AA stated that his death resulted from excessive force used during questioning. These cases reveal systemic issues that need addressing within the ULA judiciary. They highlight the dangers of inadequate oversight and the need for reforms to ensure that justice is administered fairly, without the use of excessive force or abuse of power. The incidents also underscore the challenges of maintaining rule of law during a time of armed conflict, where the judiciary's capacity to investigate and hold responsible parties accountable is limited.

## The ULA's Accountability

ULA/AA spokesperson U Khine Thukha acknowledged the responsibility of the officers involved and promised a thorough investigation<sup>95</sup>. He also revealed that Ko Aung Naing had suffered internal injuries prior to his death and had been advised not to consume water due to the risk of shock. However, this explanation has been met with skepticism from some sections of the community<sup>96</sup>. In an attempt to address the situation, the ULA offered a compensation payment of 20 lakhs-2,000,000 MMK kyats to Aung Naing's family in October 2023. According to family members, the ULA inquired about the family's stance on the case before providing the compensation, which they described as financial support rather than a formal admission of guilt.

A family member recounted the meeting; *"An ULA officer asked for our opinion about the case and then gave us the compensation. They said it was to help the family, but for us, he's already gone, and nothing can change that. There's no punishment for those responsible."*<sup>97</sup> This compensation, however, did little to quell the community's discontent, as locals voiced concerns about the safety and fairness of the judiciary process under the ULA.

Despite the compensation, the case triggered widespread criticism among local communities about the transparency and accountability of the ULA judiciary. The case demonstrates the tension between the ULA's expanding role in law enforcement and public trust in its judiciary. Though the ULA/AA strives to project an image of justice and accountability, incidents like Ko Aung Naing's death in custody undermine its efforts to gain full public confidence. Such cases exemplify the ULA's struggles to maintain transparency and the appropriate use of force within its legal system, especially as it seeks legitimacy as an alternative to the junta's judiciary.

## Broader Implications for ULA/AA Judiciary

Ko Aung Naing's death follows a pattern of similar incidents, such as the death of U Maung Gyi Hla in Mrauk-U earlier in 2022, indicating recurring challenges in the ULA's handling of detainees. While the ULA has pledged to take action, these cases raise critical questions about the enforcement of human rights, the application of due process, and the overall capacity of the ULA's judiciary to implement reforms.

In brief, through these cases, it appears that the ULA's justice system demonstrates greater transparency in handling cases involving civilians. However, it raises concerns regarding the treatment of cases filed against ULA personnel or officers by civilians. Interviewees have pointed out that these cases highlight significant weaknesses in the transparency of the judicial process, particularly when ULA members are accused of crimes such as abuses of power against civilians. This discrepancy suggests a potential bias within the justice system, undermining public confidence and trust in the ULA's commitment to impartiality and accountability. As mentioned by one interviewee, the quality of the ULA justice system also highly depends on the discipline and capacity of the police officials who conducted the first-hand investigation before transferring the case into the courts.

## VI. Conclusion

The ULA judiciary stands at a critical juncture, presenting significant opportunities for growth, particularly with its expanding territorial control and increasing public trust. However, to ensure the continued development of the judiciary system, the ULA must focus on building internal accountability mechanisms, such as checks and balances, especially in cases involving political figures or civil servants. Establishing these mechanisms will be essential for maintaining the judiciary's integrity and independence.

One key recommendation is the incorporation of forensic science and technical expertise to support evidence-based judgments, enhancing the accuracy of investigations and ensuring more reliable legal outcomes. Additionally, improving public outreach and communication is necessary so that people are fully aware of how and where to access ULA courts, increasing accessibility and participation in the system.

While the ULA has made strides in publicly punishing wrongdoers, greater transparency is needed throughout the judicial process, particularly in cases involving civil servants, to further build public trust.

Capacity building for court staff, judges, and police forces is another critical area for development. Strengthening the skills and resources of legal professionals will help establish a judiciary that is not only independent but also fully trusted by the public. With these improvements, the ULA judiciary has the potential to become a more credible and efficient institution, playing a central role in governance and justice delivery in Rakhine State. Recommendations for the ULA judiciary system is diverse but can be categorized into three categories such as

- 1) improving talent judges and professionals including the police officials,
- 2) addressing favoritism and nepotism and promoting more transparency for accountability,
- 3) finally, amending better physical infrastructure of the courts and technology-based tools in investigation the crimes.

For the first recommendation, the ULA should train to enhance the capacity of the younger generations of legal professionals and should focus more on legal courses including the police officials. As the second point, the ULA judiciary system should handle and enforce anti-corruption and bribery measures more effectively and promote more transparency for accountability in taking actions against its officials who committed crimes or abuses against the civilians. Finally, as the third, the ULA should be based on evidence and systematic investigations rather than solely on human-centered approaches in addition to the construction of better offices and courts.



## Endnotes

1. COAR. (2023, September 27). A Governance Tapestry: Layered Administrations and Revolutionary Service Delivery in Western Myanmar - COAR. COAR Global. Retrieved September 17, 2024, from <https://coar-global.org/2023/09/27/a-governance-tapestry-layered-administrations-and-revolutionary-service-delivery-in-western-myanmar/>
2. Hlaing, K. H. (2023, April 21). Understanding the Arakan Army • Stimson Center. Stimson Center. Retrieved September 17, 2024, from <https://www.stimson.org/2023/7/understanding-the-arakan-army/>
3. Myint, S. A. (2019, February 7). Rakhine nationalism and the rise of the Arakan Army. Frontier Myanmar. Retrieved June 15, 2024, from <https://www.frontiermyanmar.net/en/rakhine-nationalism-and-the-rise-of-the-arakan-army/>
4. Center for Arakan Studies. (2024, July). The Arakan Army's Journey: From Rebels to Rulers and A New Arakan Paradigm. *Center for Arakan Studies*. [https://arakanstudies.org/ibr/24/03/ibr\\_03-July\\_24.html](https://arakanstudies.org/ibr/24/03/ibr_03-July_24.html)
5. Kalyvas, S. N. (2006). *The Logic of Violence in Civil War*. Cambridge University Press, Cambridge Studies in Comparative Politics. Retrieved September 17, 2024, from <https://shs.cairn.info/revue-pole-sud-2009-1-page-145>
6. Clunan, A. L., & Trinkunas, H. A. (2010). *Ungoverned Spaces: Alternatives to State Authority in an Era of Softened Sovereignty*. Stanford University Press.
7. South Sudan: Linking the Chiefs' Judicial Authority and the Statutory Court System. (2015). In M. Kötter, T. Röder, F. Schuppert, R. Wolfrum, & R. Wolfrum (Eds.), *Non-State Justice Institutions and the Law: Decision-Making at the Interface of Tradition, Religion and the State* (pp. 55–79). Palgrave Macmillan UK. [https://link.springer.com/chapter/10.1057/9781137403285\\_3#citeas](https://link.springer.com/chapter/10.1057/9781137403285_3#citeas)
8. South Sudan: Linking the Chiefs' Judicial Authority and the Statutory Court System. (2015). In M. Kötter, T. Röder, F. Schuppert, R. Wolfrum, & R. Wolfrum (Eds.), *Non-State Justice Institutions and the Law: Decision-Making at the Interface of Tradition, Religion and the State* (pp. 55–79). Palgrave Macmillan UK. [https://link.springer.com/chapter/10.1057/9781137403285\\_3#citeas](https://link.springer.com/chapter/10.1057/9781137403285_3#citeas)
9. Mampilly, Z. C. (2011). *Rebel Rulers: Insurgent Governance and Civilian Life During War*. Cornell University Press.
10. Aljazeera. (2009, April 28). *The history of the Tamil Tigers* | News. Al Jazeera. Retrieved October 12, 2024, from <https://www.aljazeera.com/news/2009/4/28/the-history-of-the-tamil-tigers>
11. FARC | *History & Peace Deal*. (2024, September 4). Britannica. Retrieved October 12, 2024, from <https://www.britannica.com/topic/FARC>
12. Menkhaus, K. (2007). Governance without Government in Somalia: Spoilers, State Building, and the Politics of Coping. (*International Security* (2007) 31 (3): 74–106.) <https://doi.org/10.1162/isec.2007.31.3.74>
13. Rahimi, H. (2022, July 26). *Remaking of Afghanistan: How the Taliban are Changing Afghanistan's Laws and Legal Institutions* – NUS Institute of South Asian Studies (ISAS). Institute of South Asian Studies. Retrieved October 12, 2024, from <https://www.isas.nus.edu.sg/papers/remaking-of-afghanistan-how-the-taliban-are-changing-afghanistans-laws-and-legal-institutions/>
14. Haviland, C. (2006, October 14). *BBC NEWS | South Asia | Parallel justice, Maoist style*. BBC News. Retrieved October 12, 2024, from [http://news.bbc.co.uk/2/hi/south\\_asia/6048272.stm](http://news.bbc.co.uk/2/hi/south_asia/6048272.stm)
15. United Nation Human Rights. (n.d.). *Basic Principles on the Independence of the Judiciary*. ohchr. Retrieved September 17, 2024, from <https://www.ohchr.org/en/instruments-mechanisms/instruments/basic-principles-independence-judiciary>
16. Shetreet, S. (1976). *JUDGES ON TRIAL - A STUDY OF THE APPOINTMENT AND ACCOUNTABILITY OF THE ENGLISH JUDICIARY*. 452 pages, North-Holland Publishing Co.
17. Transparency International. (n.d.). *Judiciary and law enforcement - Our priorities - Transparency.org*. Transparency International. Retrieved September 17, 2024, from <https://www.transparency.org/en/our-priorities/judiciary-and-law-enforcement>
18. ICJ. (2005). *International principles on the independence and accountability of judges, lawyers and prosecutors - Practitioners' guide, no. 1* | ICJ. International Commission of Jurists. Retrieved September 18, 2024, from <https://www.icj.org/resource/no-1-international-principles-on-the-independence-and-accountability-of-judges-lawyers-and-prosecutors/>
19. Langbroek, P., & Fabri, M. (2006). Is There a Right Judge for Each Case - A Comparative Study of Case Assignment in Six European Countries. (*Utrecht Law Review*, 2(2), 28–46). doi: 10.18352.
20. Huchhanavar, S. S. (4 April 2023). *Conceptualising Judicial Independence and Accountability from a Regulatory Perspective*. *Oslo Law Review*, Vol.9, Iss.2, pp 110–148. Retrieved September 17, 2024, from <https://www.idunn.no/doi/10.18261/olr.9.2.3>
21. Llewellyn, K. N. (2011). *The bramble bush: On our law and its study*. (New edition). [https://books.google.com/books?hl=en&lr=&id=rxqSEU7y6lkC&oi=fnd&pg=PT24&dq=Llewellyn,+K.+N.+\(2011\).+The+Bramble+Bush:+On+Our+Law+and+Its+Study.+&ots=RjlrAlTXay&sig=hE\\_bGqOahTNR0YpwQ9nWrwUDvFY](https://books.google.com/books?hl=en&lr=&id=rxqSEU7y6lkC&oi=fnd&pg=PT24&dq=Llewellyn,+K.+N.+(2011).+The+Bramble+Bush:+On+Our+Law+and+Its+Study.+&ots=RjlrAlTXay&sig=hE_bGqOahTNR0YpwQ9nWrwUDvFY)
22. UNODC. (2018). *THE BANGALORE PRINCIPLES OF JUDICIAL CONDUCT*. United Nations Office on Drugs and Crime. Retrieved September 17, 2024, from <https://www.unodc.org/documents/ji/training/bangaloreprinciples.pdf>
23. Velicogna, M., & Ng, G. Y. (22 June 2006). Legitimacy and Internet in the Judiciary: A Lesson From the Italian Courts' Websites Experience. *International Journal of Law and Information Technology*, 14(3), 370–389. <https://doi.org/10.1093/ijlit/eal009>
24. UNODC. (2018). *THE BANGALORE PRINCIPLES OF JUDICIAL CONDUCT*. United Nations Office on Drugs and Crime. Retrieved September 18, 2024, from <https://www.unodc.org/documents/ji/training/bangaloreprinciples.pdf>
25. THE CONSULTATIVE COUNCIL OF EUROPEAN JUDGES (CCJE). (2008). *The quality of judicial decisions*. <https://rm.coe.int>, Council of Europe. Retrieved September 18, 2024, from <https://rm.coe.int/16807482bf>
26. Merry, S. E. (1980). (Cambridge University Press online at 2024, July). Legal Pluralism. *The Law and Society Association*, 22(5), 869 - 896. <https://doi.org/10.2307/3053638>
27. McGregor, L., & McEnvoy, K. (2008). *Transitional Justice from Below*. Hart Publishing. Retrieved October 12, 2024, from <https://www.torrossa.com/it/resources/an/5215999>
28. Mika, H., & McEvoy, K. (2001). Restorative justice in conflict: Paramilitarism, community and the construction of legitimacy in Northern Ireland. *Contemporary Justice Review*, 4(3–4), 291–319. From [https://www.researchgate.net/profile/Kieran-Mcevoy/publication/249188646\\_Criminal\\_Justice\\_in\\_a\\_Divided\\_Society\\_Northern\\_Ireland\\_Prisons/links/5e9737dd299bf130799e240c/Criminal-Justice-in-a-Divided-Society-Northern-Ireland-Prisons.pdf](https://www.researchgate.net/profile/Kieran-Mcevoy/publication/249188646_Criminal_Justice_in_a_Divided_Society_Northern_Ireland_Prisons/links/5e9737dd299bf130799e240c/Criminal-Justice-in-a-Divided-Society-Northern-Ireland-Prisons.pdf)
29. Santos, S. M., Jr. (2004). *Dynamics and directions of the peace negotiations between the Philippine government and the Moro Islamic Liberation Front* (1st ed.). [PDF]. [https://cpn.nd.edu/assets/243397/2004\\_soliman\\_m\\_santos\\_dynamics\\_and\\_directions\\_of\\_the\\_peace\\_negotiations\\_between\\_the\\_philippine\\_government\\_and\\_the\\_moro\\_islamic\\_liberation\\_front.pdf](https://cpn.nd.edu/assets/243397/2004_soliman_m_santos_dynamics_and_directions_of_the_peace_negotiations_between_the_philippine_government_and_the_moro_islamic_liberation_front.pdf)
30. García-Godos, J. Victims' Rights and Distributive Justice: In Search of Actors. *Hum Rights Rev* 14, 241–255 (2013). <https://doi.org/10.1007/s12142-013-0272-4>
31. Nyane, K. M., & Whong, E. (2022, January 19). Arakan Army, not military junta, run the show in Myanmar's Rakhine state. Radio Free Asia. Retrieved September 18, 2024, from <https://www.rfa.org/english/news/myanmar/arakan-army01192022193040.html>
32. CORA. (2023, September 27). *A Governance Tapestry: Layered Administrations and Revolutionary Service Delivery in Western Myanmar* - COAR. COAR Global. Retrieved September 18, 2024, from <https://coar-global.org/2023/09/27/a-governance-tapestry-layered-administrations-and-revolutionary-service-delivery-in-western-myanmar/>

33. DMG. (2021, August 3). ULA introduces a parallel justice system for the Arakan State. DMG Newsroom, Sittwe. Retrieved September 18, 2024, from <https://www.dmediag.com/news/3235-ula-introduces>
34. DMG. (2021, August 3). ULA introduces a parallel justice system for the Arakan State. DMG Newsroom, Sittwe. Retrieved September 18, 2024, from <https://www.dmediag.com/news/3235-ula-introduces>
35. Center for Arakan Studies. (2024, July). The Arakan Army's Journey: From Rebels to Rulers and A New Arakan Paradigm. *Center for Arakan Studies*. [https://arakanstudies.org/ibr/24/03/ibr\\_03-July\\_24.html](https://arakanstudies.org/ibr/24/03/ibr_03-July_24.html)
36. Lin, N. (2023, September 20). *A New Dimension to Armed Conflicts in Arakan?* Transnational Institute. Retrieved October 9, 2024, from <https://www.tni.org/en/article/a-new-dimension-to-armed-conflicts-in-arakan>
37. Ghiotto, L., & Lynn, K. (2022, February 24). *The nature of parallel governance and Its impact on Arakan politics*. Transnational Institute. Retrieved October 12, 2024, from <https://www.tni.org/en/article/the-nature-of-parallel-governance-and-its-impact-on-arakan-politics>
38. CAS interview with a local legal expert on 11th September, 2024
39. CORA. (2023, September 27). *A Governance Tapestry: Layered Administrations and Revolutionary Service Delivery in Western Myanmar - COAR*. COAR Global. Retrieved Oct 2, 2024, from <https://coar-global.org/2023/09/27/a-governance-tapestry-layered-administrations-and-revolutionary-service-delivery-in-western-myanmar/>
40. CAS interview with a local legal expert on 11th September, 2024.
41. CAS interview with a local, current legal experienced worker on 21st September, 2024.
42. CAS interview with a current legal advocate with long-term legal background on 16th September, 2024.
43. International Crisis Group. (2022, June 1). *Avoiding a Return to War in Myanmar's Rakhine State*. Asia Report N°325. Retrieved October 10, 2024, from <https://www.crisisgroup.org/sites/default/files/325-myanmar-rakhine-state.pdf>
44. CAS interview with a local legal expert on 11th September 2024.
45. CAS team interview with a current legal advocate with strong legal background on 16th September 2024.
46. Myanmar Now. (2021, August 3). ULA/AA to establish its own judicial system in Rakhine State. Myanmar Now. Retrieved September 18, 2024, from <https://myanmar-now.org/en/news/ulaaa-to-establish-its-own-judicial-system-in-rakhine-state/>
47. Center for Arakan Studies. (2024, July). The Arakan Army's Journey: From Rebels to Rulers and A New Arakan Paradigm. *Center for Arakan Studies*. [https://arakanstudies.org/ibr/24/03/ibr\\_03-July\\_24.html](https://arakanstudies.org/ibr/24/03/ibr_03-July_24.html)
48. BNI. (2022, April 19). *Arakan Army Grows Up Quickly*. Burma News International. Retrieved October 2, 2024, from <https://www.bnionline.net/en/news/arakan-army-grows-quickly>
49. Nyane, K. M., & Lipes, J. (2021, August 23). *Arakan Army Eclipsing Government in Administering Myanmar's Rakhine State Amid Cease-fire*. Radio Free Asia. Retrieved September 2, 2024, from <https://www.rfa.org/english/new>
50. Development Media Group. (2023, Oct 23). *ULA's judiciary yet to handle over 2,500 complaints*. Retrieved 10 10, 2024, from <https://www.dmediag.com/news/cs-2500-yet.html>
51. HLAING, K. H. (2021, August 6). *Arakan Army extends administrative grip on Rakhine State*. Frontier Myanmar. Retrieved October 2, 2024, from <https://www.frontiermyanmar.net/en/arakan-army-extends-administrative-grip-on-rakhine-state/>
52. HLAING, K. H. (2021, August 6). *Arakan Army extends administrative grip on Rakhine State*. Frontier Myanmar. Retrieved October 2, 2024, from <https://www.frontiermyanmar.net/en/arakan-army-extends-administrative-grip-on-rakhine-state/>
53. BNI. (2022, April 19). *Arakan Army Grows Up Quickly*. Burma News International. Retrieved October 9, 2024, from <https://www.bnionline.net/en/news/arakan-army-grows-quickly>
54. BNI. (2022, April 19). *Arakan Army Grows Up Quickly*. Burma News International. Retrieved October 9, 2024, from <https://www.bnionline.net/en/news/arakan-army-grows-quickly>
55. ရခိုင်ပြည်နယ်က AA ရဲ့ တရားစီရင်ရေးလုပ်ငန်း စစ်တပ် မိအားပေးဟန်တား. (2022, March). VOA. Retrieved October 10, 2024, from <https://burmese.voanews.com/a/rakhine-arakan-ula-aa-voaburmese-%E1%80%9B%E1%80%81%E1%80%AD%E1%80%AF%E1%80%84%E1%80%BA-%E1%80%97%E1%80%BD%E1%80%AE%E1%80%A1%E1%80%AD%E1%80%AF%E1%80%A1%E1%80%B1%E1%80%99%E1%80%BC%E1%80%94%E1%80%BA%E1%80%99%E1%80%AC%E1%80%95%E1>
56. Parvez, A., Alam, S., & Ronnie, A. (2022, January 2). *'We recognise the human rights and citizen rights of the Rohingya'*. Prothom Alo English. Retrieved October 10, 2024, from <https://en.prothomalo.com/opinion/interview/we-recognise-the-human-rights-and-citizen-rights-of-the-rohingyas>
57. CAS team's interview with a local legal experienced person on 16th September, 2024.
58. Myanmar Now. (2021, August 3). ULA/AA to establish its own judicial system in Rakhine State. Myanmar Now. Retrieved September 18, 2024, from <https://myanmar-now.org/en/news/ulaaa-to-establish-its-own-judicial-system-in-rakhine-state/>
59. CAS team interview with a local from legal background on 16th September, 2024.
60. CAS interview with a local, current legal experienced worker on 21st September, 2024.
61. CAS team local researchers' observational data
62. CAS interview with a local legal expert on 11th September, 2024.
63. Lynn, Kyaw. (2021, June 10). *The Arakan Army, Myanmar military coup and politics of Arakan*. Transnational Institute. Retrieved October 9, 2024, from <https://www.tni.org/en/article/the-arakan-army-myanmar-military-coup-and-politics-of-arakan>
64. CAS interview with a local, current legal experienced worker on 21st September, 2024.
65. CAS team interview with a local legal expert on 21st September, 2024.
66. Center for Arakan Studies. (2024, July). *Forgotten Voices: Addressing Challenges Faced by the Double Minority Groups in Arakan* Center for Arakan Studies [https://www.arakanstudies.org/ibr/24/01/ibr\\_01-feb\\_24.html](https://www.arakanstudies.org/ibr/24/01/ibr_01-feb_24.html)
67. Smith, M. (2021, June 10). *The Arakan Army, Myanmar military coup and politics of Arakan*. Transnational Institute. Retrieved October 9, 2024, from <https://www.tni.org/en/article/the-arakan-army-myanmar-military-coup-and-politics-of-arakan>
68. CAS team interview with a local female journalist on 28th September, 2024.
69. Arakan Army, "Speech by Commander-In-Chief at 11TH anniversary day of arakan army" April 11, 2020. Retrieved October 10, 2024, from <https://www.tni.org/en/article/the-arakan-army-myanmar-military-coup-and-politics-of-arakan> <https://www.arakanarmy.net/post/speech-by-commander-in-chief-at-11th-anniversary-day-of-arakan-army>
70. CORA. (2023, September 27). *A Governance Tapestry: Layered Administrations and Revolutionary Service Delivery in Western Myanmar - COAR*. COAR Global. Retrieved Oct 2, 2024, from <https://coar-global.org/2023/09/27/a-governance-tapestry-layered-administrations-and-revolutionary-service-delivery-in-western-myanmar/>
71. CORA. (2023, September 27). *A Governance Tapestry: Layered Administrations and Revolutionary Service Delivery in Western Myanmar - COAR*. COAR Global. Retrieved Oct 2, 2024, from <https://coar-global.org/2023/09/27/a-governance-tapestry-layered-administrations-and-revolutionary-service-delivery-in-western-myanmar/>
72. CAS team interview with a local from legal background on 16th September, 2024.
73. CORA. (2023, September 27). *A Governance Tapestry: Layered Administrations and Revolutionary Service Delivery in Western Myanmar - COAR*. COAR Global. Retrieved Oct 2, 2024, from <https://coar-global.org/2023/09/27/a-governance-tapestry-layered-administrations-and-revolutionary-service-delivery-in-western-myanmar/>

74. CORA. (2023, September 27). *A Governance Tapestry: Layered Administrations and Revolutionary Service Delivery in Western Myanmar* - COAR. COAR Global. Retrieved Oct 2, 2024, from <https://coar-global.org/2023/09/27/a-governance-tapestry-layered-administrations-and-revolutionary-service-delivery-in-western-myanmar/>

75. CORA. (2023, September 27). *A Governance Tapestry: Layered Administrations and Revolutionary Service Delivery in Western Myanmar* - COAR. COAR Global. Retrieved Oct 2, 2024, from <https://coar-global.org/2023/09/27/a-governance-tapestry-layered-administrations-and-revolutionary-service-delivery-in-western-myanmar/>

76. CORA. (2023, September 27). *A Governance Tapestry: Layered Administrations and Revolutionary Service Delivery in Western Myanmar* - COAR. COAR Global. Retrieved Oct 2, 2024, from <https://coar-global.org/2023/09/27/a-governance-tapestry-layered-administrations-and-revolutionary-service-delivery-in-western-myanmar/>

77. Development Media Group. (2023, Oct 23). *ULA's judiciary yet to handle over 2,500 complaints*. Retrieved 10 10, 2024, from <https://www.dmediag.com/news/cs-2500-yet.html>

78. Western News 2022, မြောက်ဦးမှ ဦးမောင်ကြီးလှမှာ မလိုလားအပ်သည့် မတော်တဆမှုဖြင့် သေဆုံးခြင်းဖြစ်ဟု AA ပြော၊ မိသားစုများ လက်မခံ၊ April 5, Retrieved September 2024, from [https://web.facebook.com/westernnewsagency?\\_cft\\_\\_\[0\]=AZUe8rPVnWiTNbVG0hJa4sBbWezG5-DMjqFqGikRlszX5vGw6KQ6BsBH6YKo\\_8jg9Z\\_1PdY5iYBuWfTks\\_03O2URr41qYqopi7nU-w6C9OBhGE-8mSUGd0vH9FubDP6RVIEVY-TwWxOfXXs0pTlmoW76q7fhFzUY4I6m\\_YiFoEda8YRRpuHSQahLCKTbvq7BYM&\\_tn=-UC%2CP-y-R](https://web.facebook.com/westernnewsagency?_cft__[0]=AZUe8rPVnWiTNbVG0hJa4sBbWezG5-DMjqFqGikRlszX5vGw6KQ6BsBH6YKo_8jg9Z_1PdY5iYBuWfTks_03O2URr41qYqopi7nU-w6C9OBhGE-8mSUGd0vH9FubDP6RVIEVY-TwWxOfXXs0pTlmoW76q7fhFzUY4I6m_YiFoEda8YRRpuHSQahLCKTbvq7BYM&_tn=-UC%2CP-y-R)

79. AA Press Conference, Western News Media, 2022 မြောက်ဦးဒေသခံ ဦးမောင်ကြီးလှ သေဆုံးမှုကိစ္စ အတွက် စစ်ဆေးရေးမှူးနှစ်ဦးကို အရေးယူထားဟု ULA/AA ပြော (ရုပ်သံ), Retrieved September 2024, from <https://web.facebook.com/watch/?v=419947273273852&ref=sharing&rdc=1&rd>

80. AA Press Conference, Western News Media, 2022

81. Western News 2022, ဦးမောင်ကြီးလှ အသတ်ခံရမှု AA ၏ အရေးယူ ဆောင်ရွက်ချက် ပွင့်လင်းမြင်သာမှုမရှိ၊ တရားမျှတမှုရရှိရေး မိသားစုဝင်များလိုလားနေ၊ August 12, Retrieved September 2024, from [https://web.facebook.com/westernnewsagency?\\_cft\\_\\_\[0\]=AZVvd0\\_nZgigYMoGq\\_EGK8XIXnMMR263aaYKbBVvnaMXEYeoXvUUj8ZKRZqDg1\\_6SoOUJqY17wZ1Tcm0sou0xO-xKGqQT5-WD6VI3R\\_DIALqtu8K8DQoMa3vW3D0Aoay1GO4vutyyWfOfLjNiHqMeoVblooENGMQ58ewxmGuNhNgzQ&\\_tn=-UC%2CP-R](https://web.facebook.com/westernnewsagency?_cft__[0]=AZVvd0_nZgigYMoGq_EGK8XIXnMMR263aaYKbBVvnaMXEYeoXvUUj8ZKRZqDg1_6SoOUJqY17wZ1Tcm0sou0xO-xKGqQT5-WD6VI3R_DIALqtu8K8DQoMa3vW3D0Aoay1GO4vutyyWfOfLjNiHqMeoVblooENGMQ58ewxmGuNhNgzQ&_tn=-UC%2CP-R)

82. Western News 2022, ဦးမောင်ကြီးလှ အသတ်ခံရမှု AA ၏ အရေးယူ ဆောင်ရွက်ချက် ပွင့်လင်းမြင်သာမှုမရှိ၊ တရားမျှတမှုရရှိရေး မိသားစုဝင်များလိုလားနေ၊ August 12, Retrieved September 2024, from [https://web.facebook.com/westernnewsagency?\\_cft\\_\\_\[0\]=AZVvd0\\_nZgigYMoGq\\_EGK8XIXnMMR263aaYKbBVvnaMXEYeoXvUUj8ZKRZqDg1\\_6SoOUJqY17wZ1Tcm0sou0xO-xKGqQT5-WD6VI3R\\_DIALqtu8K8DQoMa3vW3D0Aoay1GO4vutyyWfOfLjNiHqMeoVblooENGMQ58ewxmGuNhNgzQ&\\_tn=-UC%2CP-R](https://web.facebook.com/westernnewsagency?_cft__[0]=AZVvd0_nZgigYMoGq_EGK8XIXnMMR263aaYKbBVvnaMXEYeoXvUUj8ZKRZqDg1_6SoOUJqY17wZ1Tcm0sou0xO-xKGqQT5-WD6VI3R_DIALqtu8K8DQoMa3vW3D0Aoay1GO4vutyyWfOfLjNiHqMeoVblooENGMQ58ewxmGuNhNgzQ&_tn=-UC%2CP-R)

83. DMG, By DMG on 1 April, 2022, <https://www.facebook.com/share/p/Z8pnwvmlKvDaagZE/>

84. Western News 2022, ဦးမောင်ကြီးလှ အသတ်ခံရမှု AA ၏ အရေးယူ ဆောင်ရွက်ချက် ပွင့်လင်းမြင်သာမှုမရှိ၊ တရားမျှတမှုရရှိရေး မိသားစုဝင်များလိုလားနေ၊ August 12, Retrieved September 2024, from [https://web.facebook.com/westernnewsagency?\\_cft\\_\\_\[0\]=AZVvd0\\_nZgigYMoGq\\_EGK8XIXnMMR263aaYKbBVvnaMXEYeoXvUUj8ZKRZqDg1\\_6SoOUJqY17wZ1Tcm0sou0xO-xKGqQT5-WD6VI3R\\_DIALqtu8K8DQoMa3vW3D0Aoay1GO4vutyyWfOfLjNiHqMeoVblooENGMQ58ewxmGuNhNgzQ&\\_tn=-UC%2CP-R](https://web.facebook.com/westernnewsagency?_cft__[0]=AZVvd0_nZgigYMoGq_EGK8XIXnMMR263aaYKbBVvnaMXEYeoXvUUj8ZKRZqDg1_6SoOUJqY17wZ1Tcm0sou0xO-xKGqQT5-WD6VI3R_DIALqtu8K8DQoMa3vW3D0Aoay1GO4vutyyWfOfLjNiHqMeoVblooENGMQ58ewxmGuNhNgzQ&_tn=-UC%2CP-R)

85. Western News 2022, ဦးမောင်ကြီးလှ အသတ်ခံရမှု AA ၏ အရေးယူ ဆောင်ရွက်ချက် ပွင့်လင်းမြင်သာမှုမရှိ၊ တရားမျှတမှုရရှိရေး မိသားစုဝင်များလိုလားနေ၊ August 12, Retrieved September 2024, from [https://web.facebook.com/westernnewsagency?\\_cft\\_\\_\[0\]=AZVvd0\\_nZgigYMoGq\\_EGK8XIXnMMR263aaYKbBVvnaMXEYeoXvUUj8ZKRZqDg1\\_6SoOUJqY17wZ1Tcm0sou0xO-xKGqQT5-WD6VI3R\\_DIALqtu8K8DQoMa3vW3D0Aoay1GO4vutyyWfOfLjNiHqMeoVblooENGMQ58ewxmGuNhNgzQ&\\_tn=-UC%2CP-R](https://web.facebook.com/westernnewsagency?_cft__[0]=AZVvd0_nZgigYMoGq_EGK8XIXnMMR263aaYKbBVvnaMXEYeoXvUUj8ZKRZqDg1_6SoOUJqY17wZ1Tcm0sou0xO-xKGqQT5-WD6VI3R_DIALqtu8K8DQoMa3vW3D0Aoay1GO4vutyyWfOfLjNiHqMeoVblooENGMQ58ewxmGuNhNgzQ&_tn=-UC%2CP-R)

86. Western News 2022, ဦးမောင်ကြီးလှ အသတ်ခံရမှု AA ၏ အရေးယူ ဆောင်ရွက်ချက် ပွင့်လင်းမြင်သာမှုမရှိ၊ တရားမျှတမှုရရှိရေး မိသားစုဝင်များလိုလားနေ၊ August 12, Retrieved September 2024, from [https://web.facebook.com/westernnewsagency?\\_cft\\_\\_\[0\]=AZVvd0\\_nZgigYMoGq\\_EGK8XIXnMMR263aaYKbBVvnaMXEYeoXvUUj8ZKRZqDg1\\_6SoOUJqY17wZ1Tcm0sou0xO-xKGqQT5-WD6VI3R\\_DIALqtu8K8DQoMa3vW3D0Aoay1GO4vutyyWfOfLjNiHqMeoVblooENGMQ58ewxmGuNhNgzQ&\\_tn=-UC%2CP-R](https://web.facebook.com/westernnewsagency?_cft__[0]=AZVvd0_nZgigYMoGq_EGK8XIXnMMR263aaYKbBVvnaMXEYeoXvUUj8ZKRZqDg1_6SoOUJqY17wZ1Tcm0sou0xO-xKGqQT5-WD6VI3R_DIALqtu8K8DQoMa3vW3D0Aoay1GO4vutyyWfOfLjNiHqMeoVblooENGMQ58ewxmGuNhNgzQ&_tn=-UC%2CP-R)

87. Western News 2022, မန္တလေးတိုင်း သေဆုံးမှု နောက်ဆက်တွဲဖြစ်စဉ် တွေ့ရှိချက် (Special Report) August 29, Retrieved September 2024, from [https://web.facebook.com/westernnewsagency/posts/pfbid02dMX1c9SHhKrPYfgRvmCLRvK1X1GyrGJNwoS1EGxinCzUTzZHeM7GmUbb3AYbz4QRI?\\_cft\\_\\_\[0\]=AZXvbXXtX6kaysCSI7HtASJYt6K69WVWFxb\\_wk-ka0XttQHTg5gUISGe\\_O372aJODAZI-RH59D9pl62Pf-mJBMkIdrzUvelepVXj9fOfMjyUcxN\\_vuXUjGQpyibXbVfVfGXAx73MXQoJ6V5S476RHj-ZdvsqgUv35Meu\\_HtBPER8yf8-FDYJ3KxRk4imo&\\_tn=%2CO%2CP-y-R](https://web.facebook.com/westernnewsagency/posts/pfbid02dMX1c9SHhKrPYfgRvmCLRvK1X1GyrGJNwoS1EGxinCzUTzZHeM7GmUbb3AYbz4QRI?_cft__[0]=AZXvbXXtX6kaysCSI7HtASJYt6K69WVWFxb_wk-ka0XttQHTg5gUISGe_O372aJODAZI-RH59D9pl62Pf-mJBMkIdrzUvelepVXj9fOfMjyUcxN_vuXUjGQpyibXbVfVfGXAx73MXQoJ6V5S476RHj-ZdvsqgUv35Meu_HtBPER8yf8-FDYJ3KxRk4imo&_tn=%2CO%2CP-y-R)

88. Western News 2022, မန္တလေးတိုင်း သေဆုံးမှု နောက်ဆက်တွဲဖြစ်စဉ် တွေ့ရှိချက် (Special Report) August 29, Retrieved September 2024, from [https://web.facebook.com/westernnewsagency/posts/pfbid02dMX1c9SHhKrPYfgRvmCLRvK1X1GyrGJNwoS1EGxinCzUTzZHeM7GmUbb3AYbz4QRI?\\_cft\\_\\_\[0\]=AZXvbXXtX6kaysCSI7HtASJYt6K69WVWFxb\\_wk-ka0XttQHTg5gUISGe\\_O372aJODAZI-RH59D9pl62Pf-mJBMkIdrzUvelepVXj9fOfMjyUcxN\\_vuXUjGQpyibXbVfVfGXAx73MXQoJ6V5S476RHj-ZdvsqgUv35Meu\\_HtBPER8yf8-FDYJ3KxRk4imo&\\_tn=%2CO%2CP-y-R](https://web.facebook.com/westernnewsagency/posts/pfbid02dMX1c9SHhKrPYfgRvmCLRvK1X1GyrGJNwoS1EGxinCzUTzZHeM7GmUbb3AYbz4QRI?_cft__[0]=AZXvbXXtX6kaysCSI7HtASJYt6K69WVWFxb_wk-ka0XttQHTg5gUISGe_O372aJODAZI-RH59D9pl62Pf-mJBMkIdrzUvelepVXj9fOfMjyUcxN_vuXUjGQpyibXbVfVfGXAx73MXQoJ6V5S476RHj-ZdvsqgUv35Meu_HtBPER8yf8-FDYJ3KxRk4imo&_tn=%2CO%2CP-y-R)

89. Western News 2023, မန္တလေးတိုင်း အမှုတွင် လူသတ်တရားခံအဖြစ် စွပ်စွဲခံထားရသူ မောင်မျိုးချစ်စိုး ပြန်လွတ်မြောက်လာ၊ January 27, Retrieved September 2024, from <https://web.facebook.com/westernnewsagency/posts/pfbid0PYu8INjZQroANLnqf4vDBSg87krQkkGpu8stq3jBSecFeU8My43NZfz2ambCAygilZrDid=iQVPhEMGUEFBwBV>

90. Western News 2023, မန္တလေးတိုင်း သေဆုံးမှုတွင် တရားခံဖြစ်သူ မျိုးမြင့်ဇော် အား ULA/AA တရားရုံးက သေဒဏ်ချမှတ်၊ February 3, September 2024, from <https://www.facebook.com/share/p/wUryH1zrjLtP35UM/>

91. Western News 2023, ULA/ AA တရားရုံးမှ သေဒဏ်ချမှတ်ခံရသည့် မန်နေဂျာ မျိုးမြင့်ဇော် အယူခံတက်ခွင့်ရ၊ February 3, Retrieved September 2024, from <https://web.facebook.com/westernnewsagency/posts/pfbid0PYu8INjZQroANLnqf4vDBSg87krQkkGpu8stq3jBSecFeU8My43NZfz2ambCAygilZrDid=iQVPhEMGUEFBwBV>

92. Narinjara 2023, ULA/AA က ဖမ်းဆီးစစ်ဆေးနေစဉ် သေဆုံးသွားသည့် ကျောက်ဖြူမှ လူငယ်အမှု တာဝန်ရှိသူများကို အရေးယူမည်ဟု ဦးခိုင်သုခပြော၊ October 13, Retrieved September 2024, from

93. Development Media Group 2023, ULA/ AA က ဖမ်းဆီးစစ်ဆေးနေသည့် ကျောက်ဖြူဒေသခံတစ်ဦး သေဆုံး၊ October 12, Retrieved September 2024, from <https://web.facebook.com/dmgnewsagency/posts/pfbid08PDFotLwPpj4VDu1B3Zew51c8A2zDZHrVKSsUXSYt1bUSdfzRxc81iWuc9i9QMKI?rdid=fzA3DtpgdHfUdl4s>



94. Development Media Group 2023,ULA/ AA က ဖမ်းဆီးစစ်ဆေးနေသည့် ကျောက်ဖြူဒေသခံတစ်ဦး သေဆုံး, October 12,Retrieved September 2024, from [https://web.facebook.com/dmgnewsagency/posts/pfbid02PJUyjdRFGpkWA91YCcs34Q88mzorvGQZSmVM4BN8yHjRjRoUXnu3szQeoifmzSdml?\\_cft\\_\\_\[0\]=AZWwnj6euF8GUGYdERerp5rQUOymccF\\_FRzEXud-mpnufbGSsgFeLfGmFeA6Y4lSTg9u-k59P6Ux9ckZy3W1Xb4YQBF-gNo1oTL2sWRC\\_508dPZY8r7k0NbWBTMuREmENxhhSfC2tXp7i8hcAaCvIyc48p6LS47fLXOldUOxDwILMg&\\_tn\\_=%2CO%2CP-R](https://web.facebook.com/dmgnewsagency/posts/pfbid02PJUyjdRFGpkWA91YCcs34Q88mzorvGQZSmVM4BN8yHjRjRoUXnu3szQeoifmzSdml?_cft__[0]=AZWwnj6euF8GUGYdERerp5rQUOymccF_FRzEXud-mpnufbGSsgFeLfGmFeA6Y4lSTg9u-k59P6Ux9ckZy3W1Xb4YQBF-gNo1oTL2sWRC_508dPZY8r7k0NbWBTMuREmENxhhSfC2tXp7i8hcAaCvIyc48p6LS47fLXOldUOxDwILMg&_tn_=%2CO%2CP-R)
95. Development Media Group, 2023, ကျောက်ဖြူဒေသခံလူငယ် သေဆုံးမှုတွင် တာဝန်ကျ ULA ရဲတပ်ဖွဲ့ဝင်များကို ထိန်းသိမ်းစစ်ဆေးနေကြောင်းပြော, October 13,Retrieved September 2024, from [https://web.facebook.com/dmgnewsagency?\\_cft\\_\\_\[0\]=AZWwnj6euF8GUGYdERerp5rQUOymccF\\_FRzEXud-mpnufbGSsgFeLfGmFeA6Y4lSTg9u-k59P6Ux9ckZy3W1Xb4YQBF-gNo1oTL2sWRC\\_508dPZY8r7k0NbWBTMuREmENxhhSfC2tXp7i8hcAaCvIyc48p6LS47fLXOldUOxDwILMg&\\_tn\\_=-UC%2CP-R](https://web.facebook.com/dmgnewsagency?_cft__[0]=AZWwnj6euF8GUGYdERerp5rQUOymccF_FRzEXud-mpnufbGSsgFeLfGmFeA6Y4lSTg9u-k59P6Ux9ckZy3W1Xb4YQBF-gNo1oTL2sWRC_508dPZY8r7k0NbWBTMuREmENxhhSfC2tXp7i8hcAaCvIyc48p6LS47fLXOldUOxDwILMg&_tn_=-UC%2CP-R)
96. Narinjara 2023, ULA/AA က ဖမ်းဆီးစစ်ဆေးနေစဉ် သေဆုံးသွားသည့် ကျောက်ဖြူမှ လူငယ်အမှု တာဝန်ရှိသူများကို အရေးယူမည်ဟု ဦးခိုင်သုခပြော, October 13,Retrieved September 2024, from
97. Narinjara 2023,ULA/AA ၏ အချုပ်ထောင်အတွင်း သေဆုံးသွားသူ ကိုအောင်နိုင်အတွက် မိသားစုကို နှစ်နာကြေး ကျပ်သိန်း ၂၀ ပေး, October 21,Retrieved September 2024, from <https://burmese.narinjara.com/news/detail/6533be5b6f9b6045ba342899>