



MALAYSIA'S \$14.92 BILLION LEGAL BATTLE

SULU FRAUD VS. MALAYSIA'S TRUTH

**Legal Affairs Division of the
Prime Minister's Department, Malaysia**

September 2025





THE SULU CASE IS A THORN IN MALAYSIA'S SOVEREIGNTY AND NATIONAL SECURITY

SUMMARY

In February 2022, eight individuals who claimed to be the descendants of the defunct Sultan of Sulu, Sultan Jamalul Kiram II, received an ostensibly final award worth \$14.92 billion in an arbitration proceeding against the Government of Malaysia. The said award was delivered by the sole arbitrator, Dr Gonzalo Stampa.

Malaysia is currently pursuing its legal battle against the Sulu claimants across Europe to ensure that the purported Final Award, constituting 16% of the country's national budget, is overturned.

In June 2023, Malaysia successfully secured two landmark victories in the Paris and the Hague Courts of Appeal.

In November 2023, the Paris Courts oversaw the withdrawal of the measures registered by the Claimants on the diplomatic buildings owned by Malaysia in France. The Paris enforcement judge quashed its prior ex parte order that authorised a statutory mortgage to be registered on these diplomatic buildings. The judge also recorded the Claimants' withdrawal from the proceedings they had initiated to seize these diplomatic buildings.

On 22 December 2023, the Spanish Criminal Court found Dr. Stampa guilty of contempt of court. The Criminal Court has sentenced Dr. Stampa to six months in prison and a year ban from professional practice as an arbitrator.

In November 2024, the French Supreme Court for civil and criminal matters, the Court of Cassation, fully dismissed the challenge filed by the so-called heirs. The decision means that the Partial Award, which was the initial basis for the sham Final Award, is not recognised under French law.

In February 2025, the High Court of Justice of Madrid dismissed the application for annulment that was filed by the purported heirs of the Sultanate of Sulu, trying to challenge the nullification of the appointment of Gonzalo Stampa as arbitrator.

On 7 July 2025, the Paris Court of Appeal concluded its hearing on the merits for the annulment of the so-called Final Award. The Claimants' attempt to postpone the proceedings was rejected, and the Court reserved its decision to December 2025.

With these consecutive victories, Malaysia is advancing steadily towards the complete annulment of the purported Final Award in France.



THE HONOURABLE DATO' SERI ANWAR BIN IBRAHIM

(PRIME MINISTER OF MALAYSIA)

“The Government of Malaysia is confident that we are now closer than ever to completely nullifying the sham and abusive final award amounting to approximately \$15 billion issued by Stampa, thus consigning the claimants’ flawed claims to history.”



HISTORY OF THE CASE

HISTORY

The case dates back to the Sulu Sultanate's historical presence in the Philippines and a portion of Sabah, Malaysia.

It centers on an 1878 colonial agreement where the Sultan of Sulu ceded in perpetuity North Borneo (Sabah today) to merchants, Messrs. Gustavus Baron von Overbeck and Alfred Dent. The merchants agreed to an annual cession payment of RM5,000 to the legitimate heirs of the Sulu Sultanate.

In 1903, the cession was affirmed to the British North Borneo Company.

In 1936, Sultan Jamalul Kiram II died and the payment was ceased as the rightful heirs to the Sulu Sultanate could not be determined. In 1936, the High Court of the State of North Borneo identified the heirs of the Sultan of Sulu who were entitled to the cession payment (commonly known as "the Macaskie Judgement 1939").

In 1962, Sabah exercised self-determination and joined Malaysia in 1963.

The Malaysian Government has never recognized the legitimacy of the self-proclaimed Sultanate of Sulu.



THE 2013-ARMED INVASION OF SABAH BY THE ROYAL SULU FORCE

The 1878 agreement, inherited by Malaysia, involved payments to the supposed heirs of Sultan Jamalul Kiram II until 2013.

Payments ceased after a violent armed invasion of Sabah in 2013, ordered by the self-proclaimed Sultan Jamalul Kiram III.

The deadly attack, resulting in 78 casualties, prompted Malaysia to terminate payments, taking decisive action against a security threat.



The ‘Royal Sulu Forces’ behind the 2013 armed invasion is now designated a terrorist group by the Malaysian Government, emphasizing the ongoing priority of security in Sabah.

In April 2023, the Malaysian Ministry of Home Affairs classified Fuad A. Kiram as a terrorist for his participation and commission of a terrorist act and close affiliation with the Royal Sulu Forces.

THE CLAIMANTS WHO ARE THE CLAIMANTS?

The eight Sulu claimants claim to be the descendants of so-called Sultan Jamalul Kiram II of Sulu, who died in 1936.

The Malaysian Government understands that they are all Philippine nationals. However, there is very little information about their identity or their true relation to the Sultan which remains under question.

The names of the claimants are:

- **Nurhima Kiram Fornan;**
- **Fuad A. Kiram** - *he is cited as a terrorist by the Malaysian Ministry of Home Affairs in an investigation led in April 2023 for his connection to the Royal Sulu Forces, which led the 2013 Sabah Incursion.*
- **Sheramar T. Kiram;**
- **Permaisuli Kiram – Guerzon;**
- **Taj – Mahal Kiram – Tarsum Nuqui;**
- **Ahmad Nazard Kiram Sampang** (deceased, 2023);
- **Jenny K.A. Sampang; and**
- **Widz – Raunda Kiram Sampang**

WHO IS FINANCIALLY SUPPORTING THE CLAIMANTS?

The claimants receive funding from a global litigation funder, Therium. This means that the eight individuals are financially supported by a well-funded global business that aims to profit from the success of cases in which they invest.

This funding covers the legal expenses incurred by the lawyers representing the Sulu claimants in different ongoing proceedings all over the world.

It remains uncertain whether Therium or the claimants’ legal advisors have conducted due diligence on the true identity of the Sulu claimants and their connections to the self-proclaimed Sulu Sultanate.

Reports indicate that Therium has already invested over \$20 million in the claim, anticipating substantial returns from the Government of Malaysia. Malaysia is unaware of whether Therium is directly providing financial support to the claimants.

DR. GONZALO STAMPA

WHO IS DR. GONZALO STAMPA?

In March 2019, Dr. Gonzalo Stampa, a Spanish lawyer, was initially appointed as the sole arbitrator by the High Court of Justice of Madrid. Malaysia was not duly summoned in the appointment proceedings and therefore was not able to defend itself. The Malaysian Government does not recognise Dr. Stampa's appointment and refrained from participating in the proceeding that he presided over.

In June 2021, following Malaysia's application, the High Court of Justice of Madrid annulled the judicial appointment of Mr Stampa as arbitrator and instructed him to terminate the arbitration proceeding. Surprisingly, Dr. Stampa, who legally was no longer an arbitrator, defied the Spanish Court's order, relocating the seat of arbitration from Spain to France.

As a consequence, Dr. Stampa became the subject of criminal proceedings in Spain following a criminal complaint filed by the Spanish Public Prosecution. In February 2023, the Spanish Constitutional Court confirmed his annulment as the arbitrator for the Sulu case. Subsequently, he faced indictment by the Spanish Public Prosecutor for contempt of court, accusing him of willfully disobeying the binding orders from the High Court of Justice of Madrid on several occasions.

Dr. Stampa, a former partner at B. Cremades y Asociados in which he worked for 13 years, a firm representing the Filipino citizens in Spain and the arbitration, received a substantial payment of over \$2,700,000 as arbitrator fees, one of the highest fee paid to an arbitrator in European proceedings.

In December 2023, Dr. Stampa underwent a criminal trial in Madrid, facing two charges; one of continuing disobedience of court orders, and the other of continuing intrusiveness in its aggravated form by publicly attributing to himself the quality of arbitrator, given that his appointment as arbitrator had been annulled by the same Spanish court that had initially appointed him.

Following a significant decision by the Madrid Criminal Court on 22 December 2023, Dr. Stampa is found guilty of contempt of court with six-month imprisonment and a one-year ban from practising as an arbitrator. The conviction was resumed from his knowing and blatant disregard of the rulings and orders issued by the Madrid High Court of Justice.

In February 2025, the High Court of Justice of Madrid dismissed the application for annulment that was filed in December 2023 by the purported heirs of the Sultanate of Sulu, who challenged the June 2021 decision, which nullified the appointment of Gonzalo Stampa as arbitrator in their claim against the Malaysian Government. The purported heirs claimed that the annulment was influenced by pressure from the Spanish Ministry of Foreign Affairs to favour Malaysia. However, the High Court of Justice of Madrid firmly rejected this application, affirming that the magistrates acted solely on legal grounds and dismissing allegations of bias as "mere opinions and speculations."



AZALINA OTHMAN SAID (MP)

MINISTER IN THE PRIME MINISTER'S DEPARTMENT (LAW AND INSTITUTIONAL REFORM), MALAYSIA

"Congratulations to all Malaysians! Rogue arbitrator Gonzalo Stampa has been found guilty of contempt of court and has been sentenced by the Spanish courts to six months in prison together with a ban from practising as an arbitrator for a year."

The Madani government's efforts in addressing and putting a stop to the Sulu fraud have not been in vain."

We persist in the fight for justice, and will continue our efforts to annul the final award."

Spanish court convicts arbitrator who awarded \$15 bln to sultan's heirs in Malaysia dispute

Reuters

January 8, 2024 4:44 PM GMT+1 · Updated 24 days ago

MADRID, Jan 8 (Reuters) - A Spanish arbitrator who awarded \$15 billion to the descendants of a former sultan in a land dispute with Malaysia dating back to the 19th century has been convicted of contempt of court, it was announced on Monday, a significant victory in Malaysia's efforts to annul the case.

Gonzalo Stampa was accused by the Spanish state prosecutor and Malaysia of failing to comply with a Madrid court ruling to drop the case by instead moving it to a court in Paris.

Los tribunales madrileños se reafirman en que actuaron correctamente en el caso del sultán de Joló

El Tribunal Superior de Justicia y la Audiencia de Madrid ratifican la nulidad del nombramiento del árbitro que condenó a Malasia a pagar 13.000 millones a los herederos del mandatario

SUPPLEMENTARY FACTS

MALAYSIA'S OBJECTIONS AGAINST THE ARBITRATION PROCEEDING

1. Why did Malaysia not respond to the initial arbitration process?

Malaysia did not participate in the proceedings before the High Court of Justice of Madrid to appoint an arbitrator because it was not properly summoned according to the mandatory Spanish rules and international conventions on notifying sovereign States. As a consequence, Malaysia could not defend its position.

The Government of Malaysia did not recognise the appointment of Dr. Stampa as the arbitrator in 2019, and did not participate in the arbitration process that he subsequently presided over.

Malaysia has at no stage waived its sovereign immunity. In addition, as confirmed by the High Court of Sabah and Sarawak, Dr. Stampa had no jurisdiction over the claim and Malaysia is the natural and proper forum to hear any claims arising from the 1878 agreement.

2. What is the relevance of the letter sent by Malaysia's former Attorney General, Tommy Thomas, to the Claimants in September 2019?

The former Attorney General's letter has no bearing on the Government of Malaysia's response to the merits of the Sulu claim. The former AG's letter did not waive Malaysia's sovereign immunity. The letter was issued without the authority of the Cabinet, and Malaysia has at no stage recognised the legitimacy of the claim.

3. What is Malaysia's response to the claim and the arbitration award?

Malaysia disputes the case brought by the Sulu Claimants on several grounds, summarised as follows:

- a) There was no arbitration clause in the 1878 Agreement, so the case cannot be the subject of international arbitration.
- b) Malaysia has at no stage waived its sovereign immunity, and therefore the arbitration process is illegitimate.
- c) The Malaysian courts have exclusive jurisdiction to hear any dispute concerning the 1878 Agreement, as per the Macaskie Judgement 1939.
- d) The Spanish Courts, determined in 29 June 2021 that the appointment of the arbitrator, Dr. Stampa, was null and void due to procedural irregularity. All actions taken by the arbitrator are deemed null and void.
- e) The 1878 agreement confirms that the Sultan of Sulu ceded his sovereign rights and powers over the territory to British which was further confirmed by the Confirmation Deed dated 1903.
- f) The Claimants submitted that they should be compensated a sum based on the total economic output of Sabah, an entire region of Malaysia.

THE CLAIMANTS' FORUM SHOPPING AND ENFORCEMENT MEASURES

1. Who would benefit from the enforcement of the purported Final Award?

The beneficiaries would be the eight individual Claimants and the litigation funder, Therium, that is backing them. With the final award equivalent to 16% of Malaysia's yearly budget, the Claimants are foreseeable to become extremely wealthy individuals to the detriment of all the Malaysians. The Government of Malaysia is therefore determined to fight the purported final award to prevent the Claimants from benefitting it.

2. Did the Sulu Claimants manage to seize any assets belonging to the Government of Malaysia?

The Sulu Claimants have attempted to seize Malaysia's assets in the Netherlands, France, and Luxembourg. However, due to legal action from the Government of Malaysia, and its foreign counsels in various jurisdictions, these efforts have either been unsuccessful or stayed.

Malaysia continues to protect its assets from any seizure measures undertaken by the Claimants through the appropriate defensive actions.

On 6 November 2023, the Paris Court revoked its previous order which granted the Claimants' request to register a statutory mortgage on Malaysia's diplomatic properties in France. On 9 November 2023, the French court recorded the Claimants' withdrawal of the seizure of three Malaysian-owned diplomatic properties in Paris, including the Malaysian Embassy.

MALAYSIA'S VIGILANT STRATEGIES ON THE NATIONAL SOVEREIGNTY, SECURITY AND ECONOMY

1. Should international investors be concerned about the Sulu case?

The Sulu claim has no bearing on the attractiveness of Malaysia as a leading foreign direct investment destination, and it demonstrates the Government's commitment to ensuring international law, and in particular global arbitration processes, is not subject to abuses. Malaysia has recently been brought together through a coalition government and looks forward to continuous economic development for the benefit of all Malaysians.

2. Why has Malaysia submitted police reports on the so-called Sulu Claimants and their representative, Paul H. Cohen?

Malaysia is continuing to pursue all legal avenues to ensure that its rights under international law are protected. It is also the Government's duty to ensure that those responsible for this sophisticated abuse of the international arbitration processes are held accountable through mechanisms under the rule of law.

The Government has therefore submitted police reports, which will then trigger a formal police investigation into both the Sulu claimants and Mr Paul H. Cohen, the Claimants' legal representative.

These measures are in response to the extraordinary actions of the Sulu Claimants and their legal representatives, which have threatened the sovereignty and security of Malaysia; and in regard to Mr Cohen, who has made patently false and serious allegations against the Attorney General of Malaysia.

The Government of Malaysia will continue to take all necessary actions including legal actions to put an end to the so-called Sulu claim and to ensure that Malaysia's interests, sovereign immunity and sovereignty are constantly safeguarded.



LANDMARK VICTORIES

PARIS

PARIS COURT OF APPEAL DECISION, JUNE 2023

On 6 June 2023, Malaysia won a landmark victory in the Paris Court of Appeal successfully challenging the partial award issued on 25 May 2020, by Dr. Gonzalo Stampa. This verdict overturns the exequatur of the partial award in France and confirms that Malaysia never submitted to arbitration. It also renders the purported final award invalid for any purpose and signals its potential annulment.

PARIS COURT DECISION, NOVEMBER 2023

On 9 November 2023, an enforcement judge in Paris officially documented the Claimants' withdrawal of their request for seizure on three Malaysian-owned diplomatic properties in Paris, linked to the \$14.92 billion arbitration dispute. Following the Court of Appeal Decision in June, which upheld the Malaysian government's challenge against the partial award issued by the arbitrator on 25 May 2020, the withdrawal of the claim against the Paris properties ensued. The judge mandated the Claimants to pay €15,000 to Malaysia as additional costs, in addition to the €100,000 ordered by a Paris Court of Appeal earlier in the year.

FRENCH SUPREME COURT DECISION, NOVEMBER 2024

On 6 November 2024, the French Supreme Court fully dismissed the challenge filed by the so-called heirs of the long-defunct Sultanate of Sulu against the Paris Court of Appeal decision, which had refused to recognise the so-called partial award on jurisdiction dated 25 May 2020. This decision means that the partial award, which formed the initial basis for the final award ordering Malaysia to pay USD 15 billion, is not recognised under French law.

PARIS COURT OF APPEAL HEARING, JULY 2025

On 7 July 2025, the Paris Court of Appeal concluded its hearing on the merits for the annulment of the so-called Final Award. The Claimants' attempt to postpone the proceedings was rejected, and the Court reserved its decision to December 2025. Malaysia is actively pursuing a swift recording of the annulment in a court decision, anticipating the unravelling of the Claimants' global enforcement endeavors.



MADRID

MADRID CRIMINAL COURT DECISION, DECEMBER 2023

On 11 December 2023, Dr. Stampa, the sole arbitrator responsible for issuing the so-called Final Award against the Government of Malaysia, faced a criminal trial in Madrid. He was accused of two crimes: continuing disobedience and aggravated intrusiveness for publicly attributing himself the role of an arbitrator.

In a landmark decision on 22 December 2023, the Madrid Criminal Court sentenced Dr. Stampa to six months imprisonment and a one-year ban from practicing as an arbitrator. This was due to his knowing and blatant disobedience of clear rulings and orders from the Madrid High Court of Justice.

THE MADRID COURT OF APPEAL DECISION MAY 2024

The Madrid Court of Appeal upheld the Madrid Criminal Court judgment of 22 December 2023 that found Dr Gonzalo Stampa guilty of contempt of court. In its judgment, the Madrid Court of Appeal confirmed that Mr Stampa knowingly and wilfully disobeyed the clear rulings and orders of the Madrid High Court of Justice.

MADRID HIGH COURT OF JUSTICE, FEBRUARY 2025

In February 2025, the High Court of Justice of Madrid firmly rejected the application for annulment filed in 2023 by the purported heirs of the Sultanate of Sulu. The application for annulment challenged the June 2021 decision, which nullified the appointment of Gonzalo Stampa as arbitrator in their claim against the Malaysian Government.



THE HAGUE

THE HAGUE COURT OF APPEAL DECISION, JUNE 2023

On 27 June 2023, Malaysia achieved another significant victory in the Hague Court of Appeal. The court upheld Malaysia's challenge against the recognition and enforcement in the Netherlands of the alleged Final Award

illegitimately issued by Dr. Gonzalo Stampa on 28 February 2022, in Paris. On 6 September 2024, the Supreme Court of the Netherlands ruled in favour of Malaysia by dismissing an appeal filed by the alleged heirs of the Sultanate of Sulu seeking to overturn the Hague Court of Appeal decision dated 27 June 2023.

The Hague court's decision was unequivocally based on three grounds:

1. No Final Award could have been lawfully rendered due to the annulment of Dr. Gonzalo Stampa's appointment as an arbitrator by the same Spanish court that initially appointed him.
2. No Final Award was validly rendered and the tribunal was not validly constituted given the prior nullification of Dr. Gonzalo Stampa's appointment as an arbitrator by the same Spanish court that had initially appointed him.
3. The exceptional stay of enforcement of the supposed Final Award in Paris serves as an additional ground for refusal, rendering the spurious award incapable of recognition and enforcement in the Netherlands

NETHERLANDS SUPREME COURT DECISION, SEPTEMBER 2024

On 6 September 2024, the Supreme Court of the Netherlands ruled in favour of Malaysia by dismissing an appeal filed by the alleged heirs of the Sultanate of Sulu seeking to overturn the Hague Court of Appeal decision dated 27 June 2023..

THE SULU CASE IS A SOPHISTICATED ABUSE OF THE ARBITRAL PROCESS AND INTERNATIONAL LAW. IT IS AN ATTEMPT TO HOLD AN INDEPENDENT SOVEREIGN STATE TO RANSOM.



**THE HONOURABLE
DATUK SERI PANGLIMA
HAJI HAJIJI BIN HAJI NOOR**

(CHIEF MINISTER OF SABAH, MALAYSIA)

“The decision by the Spanish Constitutional Court to throw out an appeal by the self-proclaimed heirs of the defunct Sulu sultanate to reinstate controversial Gonzalo Stampa as an arbitrator is proof that the claims had no basis.”



**THE HONOURABLE
DATO' SERI DIRAJA
DR. ZAMBRY ABD KADIR**

(FORMER MINISTER OF FOREIGN
AFFAIRS, MALAYSIA)

“Malaysia’s success in the legal dispute against the claims made by the purported heirs of the long-defunct Sulu Sultan in the Paris Court of Appeal proves that the country was right all along in defending its rights and sovereignty.”





TIMELINE 1878-1946

1878

The Sultan of Sulu, Baron de Overbeck, and Alfred Dent enter an agreement where the Sultan cedes his land, territory and sovereign rights in North Borneo for an annual cession payment of RM5,000.

1885

Spain renounces all sovereignty claims over territories in Borneo held by the Sultan of Sulu, acknowledging them as part of the territories administered by the British North Borneo Company, with respect to the British Government.

1903

The Sultan of Sulu confirms the cession of certain islands, with the cession money increased by RM300.

1936

The last supposed Sultan of Sulu, Jamalul Kiram II, passes away without heirs. Consequently, the British North Borneo Company ceases payments under the 1878 agreement.

1939

The High Court of the State of North Borneo hears a case to establish the rightful heirs of Sultan Jamalul Kiram II. The Macaskie Judgment identifies nine heirs, leading to the resumption of payments under the 1878 agreement.

1946

The British North Borneo Company transferred its interest, powers, and rights concerning the State of North Borneo to the British Government.

1962

The people of Sabah exercise their right to self-determination, deciding to join the Federation of Malaysia.

1963

The Federation of Malaysia is founded and inherits the 1878 agreement.

2013

A violent armed invasion of Sabah, ordered by the self-proclaimed Sultan Jamalul Kiram III and launched from the Sulu Archipelago, results in 78 casualties. In response to the security threat, the Government of Malaysia takes decisive action, leading to the cessation of payments under the 1878 agreement.

2018

In Spain, the claimants notify their intent to initiate arbitration, even though there is no arbitration clause in the 1878 agreement.

TIMELINE 1962-2019

2017

The claimants, self-proclaimed 'heirs' to the Sultan of Sulu, approach the UK Foreign and Commonwealth Office (FCO) alleging a breach of the 1878 Agreement. The FCO dismisses the claim.

05/2019

The High Court of Justice of Madrid appoints Dr. Gonzalo Stampa as the arbitrator for the case.

09/2019

The Attorney General of Malaysia, Tan Sri Tommy Thomas, sends a letter to the claimants' legal representative, Paul Cohen, offering to recommence payment of the cession monies under the 1878 agreement. This letter was sent without the authority of the Government of Malaysia.



TIMELINE

2020-2021

01/2020

Sabah High Court rules in favor of the Government, stating that the 1878 agreement lacks an arbitration clause, and therefore, the arbitrator lacks jurisdiction to address the matter. The court issues an injunction, directing Dr. Stampa and the claimants to cease the arbitration proceeding.

05/2020

Dr. Stampa issues his Preliminary Award, covering his supposed jurisdiction.



09/2021

In France, the Tribunal de Grande Instance recognized the Preliminary Award on jurisdiction granted by Dr. Stampa dated 25 May 2020 through an Exequatur Order.

10/2021

The High Court of Madrid determines that the Preliminary Award on Jurisdiction issued by Dr. Stampa on 25 May 2020, is null and void, in accordance with the decision of the High Court of Justice Madrid on 29 June 2021.

Dr. Stampa moves the purported seat of arbitration from Madrid to Paris.

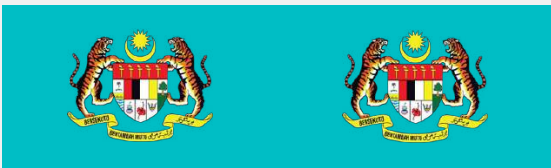
06/2021

The Superior Court of Justice of Madrid determines that the claimants failed to provide proper notice to the Government of Malaysia according to international law. The court revokes the appointment of Dr. Stampa as arbitrator and instructs him to terminate the proceedings. However, Dr. Stampa disregards the ruling.

12/2021

Malaysia files an appeal in France against the Exequatur Order, obtained by the Claimants, recognizing the Preliminary Award before the Paris Court of Appeal. The same month, Malaysia files a criminal complaint to the Attorney General of Spain due to Dr. Stampa ignoring Spanish Court orders.

The Paris Court of Appeal grants a Stay Order against the Exequatur Order which recognizes the Preliminary Award. Dr. Stampa decides to ignore the effects of the Stay Order.



TIMELINE

2022-2023

03/2022

Malaysia files an application to annul the Final Award in France.

04/2022

Malaysia has a request approved for a Stay of the Execution of the Final Award in France, preventing the enforcement of the award.

07/2022

The Paris Court of Appeal upheld Malaysia's stay of the Final Award.



02/2022

The Final Award, a \$14.92 billion arbitration Award, is issued in France by Dr. Stampa against Malaysia. It is defiance of court orders in France, Spain and a Malaysian High Court. Malaysia completely rejects the Award and does not recognize its legitimacy.

06/2022

The Stay Order against the Exequatur Order, which originally acknowledged the preliminary award granted by the Paris Court, is withdrawn after being challenged by the claimants.

01/2023

Malaysia is served with the application to recognize and enforce the Final Award in The Netherlands.

07/2022

The claimants attempt to enforce the Awards in Luxembourg.

TIMELINE 2023



01/2023

In Luxembourg, a decision on the Interim Relief proceedings is made, favouring Malaysia. The court rules to lift the bank attachments with immediate effect. Later in the month, the Spanish Constitutional Court rejects an appeal from the claimants.

06/2023

Malaysia wins a landmark victory in the Paris Court of Appeal, upholding Malaysia's challenge against the partial award. The claimants as a result can no longer rely on the sham arbitration award in France for any purpose.

03/2023

The claimant's appeal in France to lift the Stay Order on the enforcement of Final Award is rejected and the Stay Order remains in place.

04/2023

Following an investigation, the Ministry of Home Affairs issues an Anti-Money Laundering, Anti-Terrorism Financing, and Proceeds of Unlawful Activities Order against Fuad A. Kiram, one of the Sulu claimants. The Order cites Mr. Kiram's participation in and commission of a terrorist act, evidenced by his connection to the Royal Sulu Forces.

06/2023

The Hague Court of Appeal denies the claimants' petition to enforce the purported Final Award instructing the Malaysian Government to pay \$14.92 billion. The Court cites the absence of an arbitration clause in the original pact and deems the French stay as rendering the claim unenforceable in the Netherlands.

11/2023

Spanish arbitrator Dr. Gonzalo Stampa, responsible for the controversial the purported Final Award demanding Malaysia to pay \$14.92 billion to self-proclaimed heirs of the defunct Sulu Sultanate, is set to face criminal charges in the Madrid Court on 11 December 2023.

TIMELINE SINCE 2023

11/2023

The French Court had annulled the judicial authorisation to register a statutory mortgage against Malaysian diplomatic buildings in Paris by a self-proclaimed Sulu group from the Philippines. The judge further directed the Claimants to pay €15,000 to Malaysia as costs, in addition to the €100,000 ordered by a Paris Court of Appeal earlier this year. The same month, still in France, a judge recorded the claimants' withdrawal from their seizure over three Malaysian-owned diplomatic properties in Paris, previously disputed as part of the enforcement of the partial award.

12/2023

The Madrid Criminal Court declares Dr. Gonzalo Stampa guilty of contempt of court in the criminal proceedings initiated by the Spanish Public Prosecutor's Office and Malaysia. He receives a six-month prison sentence and is barred from practicing as an arbitrator for one year.



05/2024

The Madrid Court of Appeal upheld the Madrid Criminal Court judgement of 11 December 2023 that found Dr Gonzalo Stampa guilty of contempt of court, confirming his sentence consisting of six months imprisonment and a one-year ban from practicing as an arbitrator.

11/2024

The French Supreme Court fully dismissed the challenge filed by the so-called heirs of the long-defunct Sultanate of Sulu against the decision of the Paris Court of Appeal which had refused to recognise the so-called Partial Award on jurisdiction dated 25 May 2020.

09/2024

The Supreme Court of the Netherlands fully dismissed the challenge filed by the so-called heirs of the long-defunct Sultanate of Sulu against seeking to overturn the Hague Court of Appeal decision dated 27 June 2023 which upheld Malaysia's challenge against the recognition and enforcement in the Netherlands of the alleged Final Award illegitimately issued by Dr. Gonzalo Stampa on 28 February 2022, in Paris.

02/2025

The High Court of Justice of Madrid dismissed the application for annulment filed by the purported heirs of the Sultanate of Sulu, trying to challenge the nullification of the appointment of Gonzalo Stampa as arbitrator.

07/2025

The Paris Court of Appeal concluded its hearing on the merits for the annulment of the so-called Final Award and rejected the Claimants' attempt to postpone the proceedings. The Court has announced it will unveil its final decision in December 2025.



MALAYSIA IS GOING ALL OUT TO MAKE SURE THE TRUTH ABOUT THE SULU CASE IS TOLD TO THE WORLD

International Arbitration Colloquium 2023: State Sovereignty and Immunity in Commercial Arbitration

KUALA LUMPUR COLLOQUIUM (9 MAY 2023):

...The Deed of Cession is not a commercial agreement. Since Malaysia has not waived sovereign immunity, we should be entitled to such. And the dispute over territorial rights is not arbitrable. Therefore, the sole arbitrator cannot assume jurisdiction...

SABAH COLLOQUIUM (4 JULY 2023):

...The nullity of the Final Award has been scrutinised in the Hague Court of Appeal ruling on 27 June 2023, to which the court found it unqualified to be regarded as an "arbitral award" under the New York Convention 1958...

LONDON COLLOQUIUM (25 SEPTEMBER 2023):

... The Spanish Court rescinded the authority it gave to Dr. Stampa to act as arbitrator. That's the end of it. By the time he came to the court to make a final award, he simply has no power to do so because his power was terminated by the same court that clothed him with such power in the first place.

THE CASE IN THE SPHERE OF INTERNATIONAL MEDIA

Malaysia Wins Dutch Case Over Sulu Heirs' \$15 Billion Award

Arbitrator's Guilty Verdict Puts UK Funder's Investment at Risk

Malaysia hails 'victory' in row with Sulu sultan's Filipino heirs

Entre la Malaisie et les descendants d'un sultan de Bornéo, un litige rocambolesque à 15 milliards de dollars

Malaysia Wins Court Battle Over \$15 Billion Sulu Heirs Award

Sultan of Jolo case: 'Someone has to pay for all this – we will claim for damages'

Países Bajos rechaza reconocer el laudo del caso del sultán de Joló

Spanish court convicts arbitrator who awarded \$15 bln to sultan's heirs in Malaysia dispute

La Audiencia de Madrid confirma la condena al árbitro del millonario caso del Sultán de Joló

Dutch Court Rules in Favor of Malaysia, Adding to Funder's Loss

Un sultan, un fonds spéculatif et la Malaisie : récit d'une saga judiciaire à 15 milliards de dollars

Affaire Sulu en Malaisie: «Nous ne lâcherons rien», assure la ministre de la Justice

Late sultan's heirs fail in bid to challenge French ruling on Malaysia dispute

Bloomberg

EL PAÍS



THE DIPLOMAT

Le Monde

BARRON'S

El Confidencial
EL DIARIO DE LOS LECTORES INFLUYENTES



REUTERS

Challenge



For more information, please visit
malaysia-sulucase.gov.my
or scan the QR Code below:

