



AFRICAN-CARIBBEAN REPARATIONS AND RESETTLEMENT ALLIANCE

Associate Member of the CARICOM Reparations Commission

**SUPPLEMENTAL LEGAL MEMORANDUM SUBMITTED TO THE
PERMANENT COURT OF ARBITRATION REGARDING THE 1916
TREATY OF THE DANISH WEST INDIES AND THE REQUEST FOR
PROCEDURAL REVIEW AND RECOGNITION OF THIRD-PARTY
STANDING**

SUPPLEMENTAL SUBMISSION

TO: **MR. MARCIN CZEPELAK**
SECRETARY-GENERAL
PERMANENT COURT OF ARBITRATION
PEACE PALACE
CARNEGIEPLEIN 2
2517 KJ THE HAGUE
THE NETHERLANDS

FILED BY: **SHELLEY MOORHEAD**
PRESIDENT AND FOUNDER
AFRICAN-CARIBBEAN REPARATIONS AND RESETTLEMENT
ALLIANCE (ACRRA)
FORMER MINISTER OF STATE FOR EXTERNAL AFFAIRS,
UNITED STATES VIRGIN ISLANDS
FORMER SECRETARY-GENERAL, INTER-VIRGIN ISLANDS
COUNCIL
FORMER CHAIRMAN, INTER-VIRGIN ISLANDS COUNCIL
STANDING COMMITTEE

ON BEHALF OF: **THE PEOPLE OF THE UNITED STATES VIRGIN ISLANDS**

DATE: **30 MARCH 2025**

SUBJECT: **SUPPLEMENTAL SUBMISSION TO PCA – PROCEDURAL
REVIEW AND TREATY BREACH (1916 DANISH WEST
INDIES TREATY)**



**SUPPLEMENTAL LEGAL MEMORANDUM**

RE: UNITED STATES VIOLATION OF THE 1916 LANSING
DECLARATION THROUGH OFFICIAL CONDUCT IN
GREENLAND

DATE: 30 MARCH 2025

SUBMITTED BY: SHELLEY MOORHEAD
PRESIDENT AND FOUNDER
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I. INTRODUCTION

This supplemental memorandum is submitted in support of the original filing made before the Permanent Court of Arbitration (PCA) requesting recognition of third-party standing for the people of the U.S. Virgin Islands under the 1916 Treaty of the Danish West Indies. It provides urgent documentation of a material treaty breach by the United States, which has occurred subsequent to the filing.

II. BACKGROUND: THE LANSING DECLARATION AND THE 1916 TREATY

On August 4, 1916, U.S. Secretary of State Robert Lansing issued a formal diplomatic note affirming the United States would not interfere in Danish sovereignty over Greenland. The language was unequivocal:





“The Government of the United States will not object to the Danish Government extending their political and economic interests to the whole of Greenland.”

This commitment, known as the Lansing Declaration, was a precondition to the 1916 Treaty of the Danish West Indies—whereby Denmark transferred sovereignty over the Danish West Indies (now the U.S. Virgin Islands) to the United States. The two agreements formed a diplomatic package, linking recognition of Danish sovereignty in the Arctic with U.S. acquisition of territory in the Caribbean.

III. NEW DEVELOPMENT: PUBLIC BREACH BY U.S. PRESIDENT AND VICE PRESIDENT

On March 28, 2025, during a high-profile visit to Greenland, Vice President JD Vance—accompanied by National Security Advisor Mike Waltz—made multiple public statements directly repudiating Denmark’s political and economic interests in Greenland.

Key statements include:

- *“Denmark has not done a good job for the people of Greenland.”*
- *“This is why Trump’s policy is what it is.”*
- *“We have to have Greenland.” —President Donald Trump, March 28, 2025, White House press briefing*
- *“We’re going to cut a Trump-style deal.”*
- *“Greenlanders will choose the U.S. over Denmark.”*





These remarks were made at the U.S. Pituffik Space Base in northern Greenland, on foreign soil, and during an ongoing diplomatic dispute between the U.S. and Denmark over Arctic policy. The comments were broadcast globally, provoking immediate reaction from the Danish Prime Minister, Foreign Minister, and members of the Greenlandic parliament.

IV. LEGAL ANALYSIS: A MATERIAL BREACH OF THE LANSING DECLARATION

The public and official nature of these statements constitutes a material breach of the Lansing Declaration. The United States, through its highest executive officials, has:

1. **Publicly objected** to Denmark's political leadership in Greenland;
2. **Declared intent** to pursue unilateral acquisition of Greenland;
3. **Undermined the legal and diplomatic commitments** made in 1916 in exchange for Denmark's transfer of the Virgin Islands.

This breach affects not only U.S.–Danish relations but the legal foundation of U.S. sovereignty in the Virgin Islands. As the Lansing Declaration and the 1916 Treaty formed a single diplomatic structure, repudiation of one element destabilizes the integrity of the whole.

V. IMPLICATIONS FOR THIRD-PARTY STANDING AND TREATY REVIEW

The public breach reinforces the necessity of immediate procedural recognition of the people of the Virgin Islands before the PCA. It confirms:





- That the treaty continues to produce legal consequences today, despite excluding Virgin Islanders from the original agreement;
- That the United States no longer honors the original framework in its entirety;
- That Virgin Islanders are entitled to challenge the continued legal validity of their transfer and present political status under the doctrine of self-determination and post-colonial redress.

VI. CONCLUSION

This memorandum supplements the legal petition currently before the PCA and is submitted as part of the evidentiary record. The violation of the Lansing Declaration is not hypothetical—it has occurred. The time for recognition, review, and remedy is now.

30 MARCH 2025

RESPECTFULLY SUBMITTED, IN SERVICE OF MY PEOPLE,

SHELLEY MOORHEAD

PRESIDENT, AFRICAN-CARIBBEAN REPARATIONS AND RESETTLEMENT ALLIANCE

FORMER MINISTER OF STATE FOR EXTERNAL AFFAIRS, UNITED STATES VIRGIN ISLANDS

FORMER SECRETARY-GENERAL, INTER-VIRGIN ISLANDS COUNCIL

FORMER CHAIRMAN, STANDING COMMITTEE, INTER-VIRGIN ISLANDS COUNCIL

TEL: +1 340 244 0099

