

**INTERNATIONAL CRIMINAL COURT
OFFICE OF THE PROSECUTOR**

WITNESS STATEMENT

WITNESS INFORMATION:

Last Name: Agger

Gender: Male

First Name: Kasper

Father's Name: [REDACTED]

Other names used: N/A

Mother's Name: [REDACTED]

Place of Birth: [REDACTED]

Passport / ID number: [REDACTED]

Date of Birth/Age: 30.12.1978

Nationality(s): [REDACTED]

Ethnicity: N/A

Religion: [REDACTED]

Languages Spoken: [REDACTED] English, conversational French

Languages Written: [REDACTED] English

Languages Used in Interview: English

Occupation: Researcher

Place of Interview: The Hague, The Netherlands

Dates and Times of Interview: 3 October 2018, 09h40 – 12h00 and 13h00-16h40

4 October 2018, 09h40 – 13h00 and 13h40-16h00

5 October 2018, 13h40 – 16h30

Names of all persons present during interview: Kasper AGGER (Witness); [REDACTED]

[REDACTED]

[REDACTED] [Initials of all persons present during interview]

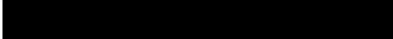
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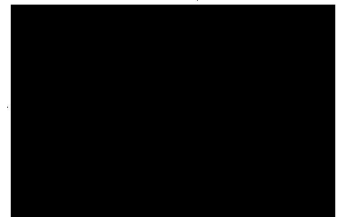
WITNESS STATEMENT

Procedure

1. I was introduced to  (hereinafter "OTP Staff") and told that they are, respectively, an investigator and a trial lawyer with the Office of the Prosecutor (OTP) of the International Criminal Court (ICC).
2. The above OTP Staff explained to me what the ICC is and described its mandate. They explained the role and mandate of the OTP within the ICC.
3. The OTP Staff explained to me that they are investigating events that took place in the Central African Republic (CAR) from 2012 to present. I was informed that the OTP is contacting me because they believe I may have information relevant for establishing the truth of matters pertinent to the investigation.
4. I agreed that the interview would be conducted in English. I fully understand and speak English.
5. The OTP Staff explained to me that I do not have to answer to their questions. The OTP Staff explained to me that they are seeking to find out the truth. I agree to tell the truth and that my answers to their questions are as complete as possible and reflect the best of my knowledge and recollection.
6. I was informed that any information I give to the OTP, including my identity, may be shared with the parties of the proceedings at the ICC; in particular the Judges, Accused persons, the Counsel of the Accused and the legal representatives of the victims.
7. The OTP Staff have explained to me the reasons and importance of keeping my contacts with the OTP confidential, which I fully understand.
8. Having understood all the above issues, I confirmed my willingness to answer the OTP Staff questions.
9. The OTP Staff explained to me how the interview was going to be conducted. I was told that I needed to be as accurate as possible in my account and that I should state when I do not know the answer to or do not understand the question. I understand

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that I need to distinguish between what I have experienced or seen myself and what I have heard or learned about from someone else.

10. I was told that at the conclusion of the interview, I would be asked to sign a written statement after having had the opportunity to review it, make any corrections, or add additional information.

Background

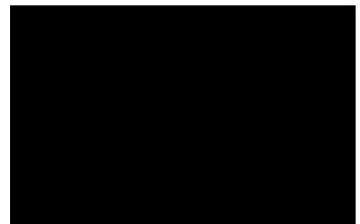
11. I have a master's degree in Social Sciences from [REDACTED] I did my final thesis on the conflict in Northern Uganda, based on field research.
12. I started working with the *The Enough Project* ("Enough") as an LRA Researcher in January 2012. In 2005 I worked as an intern in Gulu, Uganda. I did my thesis on the LRA and Northern Uganda. For 2 years I worked on a UN Development Programme. I applied for the job with *Enough* in Uganda as an LRA Researcher. It must have been in April/May 2012 I travelled to the CAR to conduct research on the LRA in the Eastern CAR. I believe I stayed there roughly 3 weeks. I researched the LRA and the role of the US Special Advisors and the role of the UPDF and what they were doing. In March/April 2013 I again travelled to the CAR. On this occasion I travelled through South Sudan to South-eastern CAR. I was embedded with the UPDF. After returning from that research trip I produced another report on LRA activities entitled "Blind Spots: Gaining Access to Areas Where the LRA Operates" published in November 2013 (see file Annex A). In 2014 and 2015 I travelled to the CAR on four occasions to research the conflict which began in 2013. I stopped working with *Enough* in May 2016.

Research Conducted in the CAR 7-28 February 2014

13. In February 2014 I travelled to the CAR and was present in Bangui from 7-28 February. That was more or less around the period when Seleka was expelled or withdrew and the Chadian military units were in the process of withdrawing back to Chad. I took notes from the phone calls I made and some of the interviews I conducted for my research. I did not travel outside of Bangui on this occasion. I spent time in PK5 and Boy Rabe. After my research in Bangui I drafted the report entitled "Behind the Headlines: Drivers of Violence in the Central African Republic" (CAR-OTP-2001-2564) published in May 2014.
14. Prior to my February 2014 trip in the CAR I conducted open source research in preparation for the trip. In planning the research trip of February 2014, I and others at *Enough* were interested in establishing facts which would enable us to discern the

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drivers of the violence in the CAR and identify the main actors involved in the conflict and produce a report. In preparation for the trip, I planned to speak to the broadest possible range of actors including those whom I could identify from open sources. I had a list of contacts from the CAR from my previous trips to the CAR. I contacted these individuals to plan for logistical arrangements – drivers, interpreters, and lodging. I had no pre-arranged meetings prior to arriving in Bangui. I arranged the meetings with various actors while in Bangui, CAR through contacts I had already made there and through NGO staff, local journalists and aid workers. I travelled to BANGUI on my own and conducted the majority of my interviews with my fixer-interpreter called [REDACTED] a local Central African based in Bangui.

15. During the course of interviews with various actors in the CAR I took handwritten notes, which I transcribed in a MS Word document on a regular basis shortly after the interviews were completed (see file “Interview notes CAR Trip Feb 07 to 28 2014” Annex B). The purpose of the note-taking was to precisely recall what interviewees had stated, to follow up, and to assist in comparing information between interviews with an eye to triangulating or confirming the information. I am able to walk the OTP Staff through my notes and explain them. Most of the time I would write either the names of the person I spoke to or the organisations those persons where from, but rarely both information’s for each interview. This is because the notes were intended to be shared with colleagues at *Enough* and I had an obligations to provide some protection of my sources; whenever requested and remembered, I gave those details to the OTP staff. My notes covers the vast majority of the people with whom I spoke but the notes do not contain comments on every single person with whom I spoke.
16. I made certain abbreviations in my notes. For example, “bz” refers to former President Francois BOZIZE, “AB” refers to anti-Balaka, “dj” refers to Michel DJOTODIQ, “Ng” refers to Patrice Edouard NGAISSONA.

Contemporaneous notes from the 7-28 February 2014 field trip

17. I provided the OTP Staff with an electronic copy of the notes I took during this field trip (see file “Interview notes CAR Trip Feb 07 to 28 2014” Annex B) and provided the OTP with some clarifications they asked me.
18. In my notes on page 4, it is written that “[t]he leader of the Dec – 5 attack was ‘Douze power’12-power,”. I did not mean to imply that he was the overall leader or the only leader, but rather that he was mentioned as one of the leaders of the 5 December 2013 attack.

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19. On page 7 under the heading of "Civil soc leaders' round table, Bangui, CAR, February 12, 2014, I want to explain that I brought 4 or 5 youth leaders together to discuss some recommendations for solutions to the conflict. The objective of the meeting was to discuss various perspectives to inform my organisation's (*Enough*) thinking on recommendations for policies to address the drivers of the conflict. I selected the youth leaders because they were all Central Africans who had started NGO's or were journalists. They were all from Bangui and they were all Christians. There were no Muslims in the group because of the *de facto* segregation of Central Africans based on religion during February 2014. The person who assisted in bringing the youth leaders together was a local university student.
20. On page 8 the heading "[REDACTED] Bangui, CAR, February 11, 2014" is a conversation I had [REDACTED] who was also a source of information for me.
21. On page 12 under the heading "Ministry of Communication, Bangui, CAR, February 12, 2014, I want to explain that this ministry was trying to prepare peace talks and local dialogues between various groups and was therefore very relevant to my research into conflict drivers. I talked to a senior civil servant in the ministry. I don't recall his name. .
22. On page 13 under the heading [REDACTED] Bangui, Car, February 2014, I want to explain that he was speaking in a very general sense. This group was doing many local dialogues to contribute to attempts at peace. This group was likely in contact with lower-level Anti-Balaka based in and around Bangui but most likely not higher-level anti-Balaka.
23. On page 15, under the heading [REDACTED] phone interview, Bangui, CAR, February 17, 2014. The reason why I spoke to the [REDACTED] is because my fixer [REDACTED] and was therefore able to get the contract number for the [REDACTED] I took advantage of this contact to get information about the situation in [REDACTED]
24. On page 15 under the heading "Picture of House destroyed belonged to JOSEPH [REDACTED] I wish to explain that I took pictures of his house after it was destroyed and looted by local Anti-Balaka groups. I was not able to establish the identities of those groups. But I wanted to find out who owned the house. Local people that I found at the house told me that it belonged to Joseph [REDACTED] which I then googled later and found the online article that describe when he was killed. I provided the OTP Staff with those pictures in electronic format (see sub-folder [REDACTED] house", in folder "Pictures Feb 2014" on Annex B).

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25. On pages 17-18, under the heading "Ministry of finance and budget, Bangui, CAR Feb 20, 2014", I wish to explain that I wanted to find out more about the economy in CAR so I spoke to a senior civil servant of the ministry there. I was given documents about the state budget.
26. On page 21, under the heading "St. Joseph IDP camp, Bangui, CAR, Feb 20, 2014," I wish to explain that I went to the camp. I went there because I was able to get access to many individuals at once to obtain their views of the conflict in CAR and to understand why they were displaced. While at the IDP camp I spoke to an individual [REDACTED] who is the one that provided me with the general information like the number of people in the camp. I then interviewed approximately 10-15 IDP's while there. From what I was able to gather, I understand that many people were there to escape inter-communal violence. The IDP camp was within the St. Joseph Church and the area immediately surrounding the church grounds. IDP's were living under makeshift tarps. The IDP's were Central Africans from the surrounding area. The IDP's were a mix of Christians and Muslim, but my understanding was that it was mainly a Christian IDP camp. I assumed there were also Muslims present because I could recognize them by their clothing and by talking to them. In the section in my notes about the Anti-Balaka summarizes the information I gathered from the IDP with whom I spoke. . I provided the OTP Staff with some pictures I took there in electronic format (see sub-folder "IDP CAMP" in folder "Pictures Feb 2014" on Annex B).
27. On page 21, under the heading "Anti-Balaka fighter, Boy-Rabe, Bangui, CAR, Feb 20 2014, I wish to explain the following: I do not recall the name of the Anti-Balaka fighter. I met this individual near the entrance to Boy-Rabe. I specifically recall this meeting because I had not had success in setting up meetings with Anti-Balaka members, so I decided to take a chance and visit Boy-Rabe to see if I could identify any anti-Balaka fighters by the *gris-gris* that I knew they commonly wore and the various machetes and weapons they would commonly carry. I had seen it on journalist's pictures of Anti-Balaka members in the news and it is quite distinctive. Soon after I arrived at what I assumed was an informal Anti-Balaka check-point in Boy-Rabe I identified 5 or 6 individuals as likely Anti-Balaka fighters because they wore gris-gris and carried long knives, so I approached them, explained that I was a researcher and wanted to have a chat with them. They agreed, one of them volunteered to talk and I interviewed him on the spot. He explained that he was Anti-Balaka and provided the information found in my notes. I spoke to him through a Sango-English interpreter whom I trust and had used for all interviews I conducted. We spoke for 20-30 minutes. I did not ask for and he did not provide contact information or identification information. My impression was that the Anti-Balaka fighters who I saw were known in the neighbourhood.

Interview with Patrice NGAISSONA – Anti-Balaka Leader, on 25 February 2014

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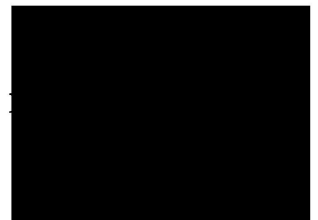
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28. I had previously tried to contact both WENEZOUÏ and NGAÏSSONA through phone because I wanted to meet some leaders of the Anti-Balaka. But I had been unsuccessful. I had understood from conversations with various individuals in Bangui and from open source media that WENEZOUÏ and NGAÏSSONA were some of the senior leaders of the Anti-Balaka. I also recall having seen in various media outlets that WENEZOUÏ and NGAÏSSONA identified themselves as being the leaders of Anti-Balaka. I went to Boy-Rabe looking for anti-Balaka members because several individuals told me that Boy-Rabe was the stronghold of the Anti-Balaka. I did not take photographs or audio record interviewees because under the circumstances I feared that any attempts to do so would most likely make it difficult to obtain spontaneous and candid information. I had previously attempted to record interviews, but with limited success and these only provided limited and shaped information. But I did take handwritten notes in a note book.
29. On page 22, under the heading "Ngaïssona, coordinator AB, Bangui, CAR, Feb 25, 2014," I wish to explain the following: I wanted to establish Anti-Balaka's motives, resources, and organisation for my research. After several failed attempts to call NGAÏSSONA to arrange a meeting with him, I drove to Boy-Rabe with a driver and an interpreter. We asked individuals on the street for directions to NGAÏSSONA's house. Various individuals guided us to NGAÏSSONA's house. My driver, my interpreter and I took a long, winding road deep inside Boy-Rabe and arrived at NGAÏSSONA's house at about 10am. NGAÏSSONA's house sits on a large walled compound containing outbuildings and vehicles. Outside of the gate that I used to enter the compound I saw around 20 individuals sitting on wooden logs and stones. The individuals variously wore gris-gris, bore firearms, carried knives and machetes. It appeared to me that they were members of the Anti-Balaka. I am not able to locate his house on Google Earth as I only went there once.
30. I told the people sitting outside of the compound that I was a researcher and wanted to speak with NGAÏSSONA. After twenty minutes of waiting my interpreter and I were invited into the compound by one individual that came out from the compound and opened the gate so that we could enter. We were brought to an outside terrace connected to NGAÏSSONA's house (see Annexe C). NGAÏSSONA appeared in a white t-shirt, shorts, and slippers and agreed to meet with me and my interpreter on the terrace of his house. There were three other smartly-dressed individuals who appeared to be part of his Anti-Balaka entourage. I don't know their names. One of them was muscular and spoke English stated he had been in the US for military training, that he was part of FACA and had been with NGAÏSSONA in exile, and was trying to help NGAÏSSONA with the organisation of the anti-Balaka. The entire meeting lasted about one and a half hours. We conversed in French with the assistance of my interpreter. There were also individuals who would come and go during the course of the interview.

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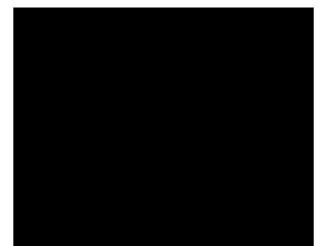
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31. NGAISSONA was willing to speak to me. He was curious to know who I was and what I was doing in Bangui. He wanted to know what I could do for him. I asked questions about Anti-Balaka's resources. I asked about the Anti-Balaka's supply of weapons and NGAISSONA claimed that the Anti-Balaka already had some weapons from the beginning of the conflict, but that they got the majority of the weapons when they fought the Seleka and took their weapons. I asked about Anti-Balaka's resources and support from Bozize. He said that Anti-Balaka would be much stronger if they got support from Bozize. He claimed that local people would give food to Anti-Balaka.
32. My general impression of the Anti-Balaka was that it was a very fragmented group. NGAISSONA claimed that he had come to organise the anti-Balaka, provide ID cards, become part of the government, participate in the DDR, and that the killings were not committed by the "real anti-Balaka" but by the "fake anti-Balaka". NGAISSONA stated that he arrived in Bangui on 14 January 2014. NGAISSONA stated he came in from Cameroon on the main road. NGAISSONA explained that the fake Anti-Balaka are the criminals, who are targeting the civilians and not targeting Seleka. According to NGAISSONA the fake Anti-Balaka do not respect the orders from NGAISSONA and other Anti-Balaka leaders. According to NGAISSONA the real Anti-Balaka fought the Seleka and threw them out. I was very sceptical of NGAISSONA's claims that he only led the real non-criminal anti-Balaka because the only armed individuals with any degree of apparent organisation were regarded as Anti-Balaka. All of the Anti-Balaka with whom I spoke talked of their own protection from Seleka and Muslims. In my view there was no actual distinction between fake and real Anti-Balaka.
33. NGAISSONA made clear that he regarded himself as a very important person within the Anti-Balaka and appeared to be a very smart politician. I regarded NGAISSONA as a very influential at the point of the interview. It was clear to NGAISSONA that he regarded himself as the senior leader of the Anti-Balaka. NGAISSONA explained to me he considered that he was saving the day for the CAR by organising the Anti-Balaka. He claimed that if he were not the leader of Anti-Balaka, it would be a lot worse and impossible to control the Anti-Balaka. I understood this to mean that NGAISSONA believed there would be more violence if he was not in control of the Anti-Balaka, which implied he was in a position to control how much violence they committed. It was my understanding that NGAISSONA was particularly powerful and influential among the Bangui based Anti-Balaka groups.
34. NGAISSONA stated that when the Anti-Balaka moved towards Bangui the FACA joined the Anti-Balaka. NGAISSONA was referring to the 5 December 2013 attack. NGAISSONA was speaking about the Anti-Balaka in general and I don't have any

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idea as to what was his role within the Anti-Balaka before coming back to BANGUI in January 2014.

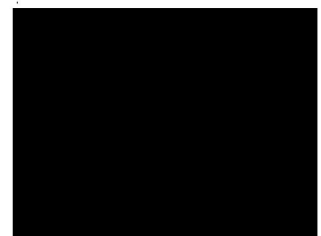
35. It is my personal assessment in the notes that NGAISSONA was an opportunist and he gathered people around him to gain influence.
36. NGAISSONA stated that "it was a very big mistake of the government to try to arrest the leader of the anti-Balaka," referring to himself in the third-person and to his own arrest that had occurred a few days before.
37. NGAISSONA stated that we can live with the Muslims but we cannot accept the leadership of the Muslims and in particular the Seleka. He also denied that the anti-Balaka were responsible for killing Muslims. He said that it was the local people and fake Anti-Balaka that were killing the Muslims, not the real Anti-Balaka.
38. NGAISSONA continually pressed me on "what can you do for me?" NGAISSONA wanted to portray himself as the leader of the anti-Balaka. I perceived that he wanted to lecture me about the status of anti-Balaka and he wanted to show the other people at the terrace that he could get a development project from me.
39. I don't recall whether NGAISSONA answered or made any phone calls during the interview but I assume he did.
40. On page 23, under the heading of "Member of NTC, HR rep, Bangui, CAR, Feb 25, 2014," I wish to explain the following: "NTC" stands for National Transitional Council.
41. On page 25, under the heading of "Gen Sec for BZ party, Bangui, CAR, Feb 25, 2014," I wish to explain the following: I visited the Secretary General of BOZIZE's political party KNK at his house and interviewed him.

CAR-OTP-2001-2564 "Behind the Headlines: Drivers of Violence in the Central African Republic"

42. This report that was shown to me by the OTP Staff is the result of my field research for *Enough* in February 2014 and its analysis and conclusions are based on the interviews I conducted and on various open source media and Human Rights NGO reports.
43. In this report, the information on the control of diamond-rich areas by the Anti-Balaka and the Seleka are mostly based on some discussions with individuals involved in the diamond trade that I met in Bangui. I went to the state owned

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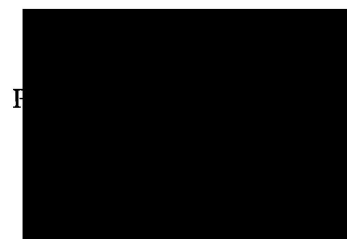


diamond shop *Bijouterie Nationale de Centrafrique Realisee Par le Ministere Des Mines, De l'energie aet de'hydraulique* (see sub-folder "Jewel shop" in folder "Pictures Feb 2014" on Annexe B). Each of these individuals related to me that Anti-Balaka and Seleka sought to control and tax the diamond supply to obtain cash and resources.

44. At page 2570: the sentence "The AB group professionalized, acquired powerful arms and attacked Bangui in December 2013 [...]" reflects a general sense of individuals with whom I spoke.
45. At page 2578: "Members of the former national army – the Forces Armées Centrafricaines, or FACA – some of whom were loyal to former President Bozizé, quickly joined Anti-Balaka groups and brought military skills and weapons. The Anti-Balaka became more organized and continued to acquire more advanced weapons, including AK-47 guns, rocket-propelled grenades, or RPGs, and hand grenades, through both their fights with the Séléka and the general availability of weapons throughout CAR." That passage was based on conversations I had with several individuals, but primarily the Anti-Balaka fighter with whom I spoke on 20 February 2014 at the entrance to the Boy Rabe neighbourhood and the conversation with Human Rights Watch and local journalists.
46. At page 2579: "The group then undertook a vicious revenge campaign, killing and mutilating Séléka fighters and members of Muslim communities, which led to retaliatory attacks between the two groups. This gradually developed into opportunistic looting for personal gain, often including violence and the murder of civilians." This is mainly based on reports from Human Rights NGOs and interviews with aid workers and journalists that were in CAR during those events. . My objective was to establish the drivers of the conflict and not to establish whether human rights violations had occurred. Other groups, such as Human Rights Watch and Amnesty, were undertaking such research.
47. At page 2579: "The Anti-Balaka also looted international organizations in Bangui and across the country. Some aid workers have been attacked and wounded by the Anti-Balaka." This is information I heard in my interviews with individuals in IDP camps and NGO workers but I don't have more details about it.
48. At page 2579: "The Anti-Balaka remain decentralized, divided into multiple groups with different and largely unarticulated political claims and without a clear command structure, although there are some exceptions. Criminal gangs and unemployed youth continue to unite and form new Anti-Balaka groups that loot and kill civilians, known as Faux Anti-Balakas. There have been reports of fights between the original Anti-Balaka and the Faux Anti-Balakas. The Anti-Balaka despise the Faux because they tarnish their name." This is information I heard from my interview with NGAISSONA and I also heard similar information from local

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journalists with whom I spoke. In the footnote 85 supporting a portion of this passage I referred to interviews with Anti-Balaka fighters and Anti-Balaka commanders. This refers to my interviews with NGAISSONA and Anti-Balaka fighters at Boy Rabe.

49. At page 2580: In looking at the photograph I can say the following: I took the analysis of structural damage done by DigitalGlobe and included it in the report. *Enough* had a partnership with DigitalGlobe, a group which analysed satellite images alongside information I provided to them that I obtained from my research in CAR. *Enough* has worked with DigitalGlobe on a number of other unrelated research projects involving similar issues of structural damage. I had provided DigitalGlobe with several names of towns that I had heard had been damaged during the conflict like BRIA, BOSSANGO, GOYA, YALOE, ANGARA and BODA. They compared satellite images of different periods and tried to identify the zone of destructions in those villages, only the images for BODA were conclusive and of particular interest, since it's a town known for diamond trade, which is why I put it there. The identification of the destroyed buildings was done by DigitalGlobe.

Anti-Balaka badges

50. After my interview with NGAISSONA, two young men from Boy-Rabe gave me the template for the anti-Balaka ID card after I requested a copy of such a badge. This happened on the last day I was in Bangui. I don't recall exactly how it was arranged, but we contacted them through the phone and agreed to meet at the entrance of Boy Rabe. However, I do recall that they provided me a USB key which I then used to copy the two files on my laptop. After being shown the metadata of the 2 files I recall that I received these files on 27 February 2014, which was last full day I was in Bangui during this particular trip. I do not recognize the names [REDACTED] found in the metadata of the files under the heading "Author". [REDACTED] My understanding of the purpose of the badges was to professionalize the group and create membership that could later be used for political pressure to push the Anti-Balaka agenda in CAR and possibly turn the Anti-Balaka into a political party (see folder "BADGE ANTI BAL AKA" on annex B).

19 June – 4 July 2014 Research Trip to Bangui

51. From 19 June to 4 July 2014, I travelled to Bangui for another research trip. The objective of this was to look at the political peace process and to do background research for the next major research report. I took handwritten notes during the trip. However, in this instance I did not later type the notes on my laptop. Rather I used the handwritten notes to draft a policy paper entitled "Seize the Peace" for

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Enough (see Annex A). I did not keep my handwritten notes once the policy paper was finalized. The objective of this particular research trip was to observe the peace and reconciliation process and gather facts with an eye to make recommendations for future research.

Testimony Before the U.S. House of Representatives

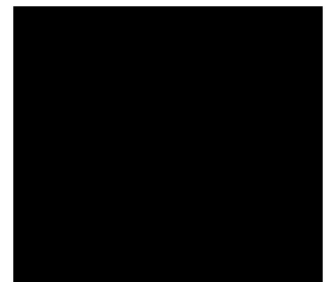
52. *Enough* arranged for me to travel to Washington DC in order to testify before the U.S. House of Representatives Sub-Committee on Africa, Global Health, and Global Human Rights, and International Organizations. I testified on 1 May 2014. This Sub-Committee had invited me as a result of my experience on the ground in the CAR and the Sub-Committee wanted to hear from me about what I had seen and analysed during my Research trip to the CAR in February 2014. The testimony was formal and I was instructed to be truthful and accurate in my testimony. My testimony is contained in exhibit CAR-OTP-2081-0603, which was shown to me and which I verified as being complete, true, and accurate.

February 7-28, 2015 Research Trip to Bangui

53. The objective of this particular research trip to BANGUI was to investigate the funding streams for the main armed groups operating in the CAR, primarily looking at the funds obtained through the gold mining, the diamond trade and the from checkpoint/road barrier extortion. I visited BANGUI, KAGA-BANDORO, and BAMBARI. I selected those locations because of they are all uniquely situated as market places of these economic activities but also because they were accessible in terms of security. I also looked into economic streams from the cattle industry in KAGA-BANDORO. For example, I observed that members of Seleka imposed taxes on the purchase of cattle provided by Chadian and Central African cattle traders. The main purchasers of the cattle were merchants and truckers who would ship the cattle to Bangui for sale in markets there. The results of this particular research trip are found in *Enough's* report entitled "Warlord Business: CAR's violent Armed Groups and their Criminal Operations for Profit and Power" from June 2015 (see Annex A).
54. During the course of interviews I took handwritten notes, which I transcribed in a MS Word document on a regular basis shortly after the interviews were completed (see file "ALL Interview notes from CAR trip February 2015 full" on Annex B).
55. During this particular research trip I interviewed several individuals from various organisations to obtain different perspectives and opinions on the issue of the economics of the armed conflict. I travelled to the CAR on my own and worked with the same fixer/translator, [REDACTED]

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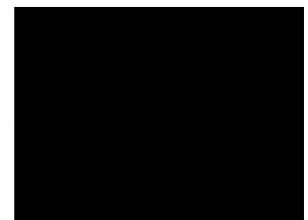
56. The methodology I applied in all my interviews conducted for purposes of research for *Enough* was the following Collecting the views of various stakeholders and actors, summarizing the information they provided, broadly synthesizing main themes and direct quotes from individuals that appeared across the span of interviews in order to produce a report with the intent to inform international and domestic policy-makers and to encourage decision-makers to take action to solve the problems identified by the research. I would have a loose agenda of subjects that I used to ask questions of subjects of my interviews. During the initial part of the interview I would try to build rapport, by allowing the person to talk about their own motivations and their work I would try to gauge the credibility of persons by asking them about particular events that I knew well and could thus evaluate the agenda of the person and whether some details were included or not. I would use multiple sources and conduct multiple interviews to try to build a complete and truthful picture I would interview individuals wherever they were, in their natural setting. If a person was in an IDP camp, I would interview them in the camp. Journalists, I would meet in a café. NGO workers I would meet at their office or at their house.

Contemporaneous notes from the 7-28 February 2015 field trip

57. I provided the OTP Staff with an electronic copy of the notes I took during this field trip (see file "ALL Interview notes from CAR trip February 2015 full" on Annex B) and provided the OTP with some clarifications they asked me.
58. On page 1, [REDACTED] is the name of an analyst from a local NGO which name I don't recall. On page 2, "ICG" refers to the International Crisis Group.
59. On page 4, among the individuals I interviewed [REDACTED]
[REDACTED] This person told me that his view was that the Anti-Balaka do not have common goals and they were un-coordinated and unorganized. He also stated that the Anti-Balaka's only relevance was to create chaos. His view was that the Anti-Balaka struggled to communicate between the different groups. He stated that the phone network where they operated was poor and they did not have advanced communications equipment. He explained that he was able to communicate with Seleka and reach agreements to negotiate humanitarian access, whereas it was difficult to pass messages to Anti-Balaka in the provinces. He suggested that commanders in BANGUI did not have much control outside BANGUI and that, in the provinces, it was difficult to identify the leaders of the Anti-Balaka and that the leadership appeared to change from day to day.
60. On page 5, "[REDACTED]" is my fixer/translator. Those notes are the result of our discussions. I don't know where [REDACTED] got this particular information from, but it was to some extent based on the interviews that we had done together. This

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"Combatants: against Ng because they are seeing that he is using the AB to pursue his own political ambitions. – Local combatants (auto-defense) and FACA wing" refers to the fact that there was a wing in the Anti-Balaka, some senior FACA that did not support NGAISSONA because they considered that he was trying to take credit and support for the fact that the Seleka had been ousted. Regarding ANDJILO who is mention there, I tried to meet him as I had heard that he had an office at the national stadium but I did not manage to contact him.

61. On page 6, I interviewed [REDACTED] I do not recall this person's name. The [REDACTED] told me that former President BOZIZE would send some money to the Anti-Balaka.
62. On page 11, I spoke to a [REDACTED] program officer who explained to me that in his view that within the Anti-Balaka there are very few incentives to be the "small guy" so many of the members wanted to be a leader of their own Anti-Balaka group. His perception was that this created a situation of many small groups of Anti-Balaka operating without a consolidated command structure. I only recall that the first name of this person was [REDACTED] I interviewed him in Bangui. He characterized the Anti-Balaka as being "land pirates" referring to the fact that their main objective was their enrichment and in particular by looting and setting road barriers.
63. On page 12, I spoke to [REDACTED] he identified himself as a spokesperson for Seleka. His view was that the Anti-Balaka was more of a criminal, rather than a political, group.
64. On page 13, I also spoke to a local journalist who expressed the view that members of Anti-Balaka were afraid of registering their names with Ngaissona for badges and formal membership in the Anti-Balaka because they feared being accused of crimes by the International Criminal Court. This journalist told me that BOZIZE used to send money to NGAISSONA and that GAYA Alfred was of the person that would be sent to get the money from BOZIZE in CAMEROUN and bring it back to NGAISSONA. I don't have more information on GAYA Alfred. This local journalist, whose name and journal I don't recall, also mentioned that he was in possession of recordings of the French giving money to WENEZOU. "Winuzei" in my notes stands for WENEZOU whose spelling I did not know at the times I took those notes. I was not able to get those recordings from this journalist, I don't know if he really had them in his possession. He mentions Basil DIKA and RAMBO but I don't recollect any more information than the ones in my notes.
65. On page 14, I interviewed [REDACTED] a staff member of [REDACTED] Igor held the view that NGAISSONA and other Bangui-based Anti-Balaka coordinators had very limited control of the Anti-Balaka in the field. Further my interpreter held that view

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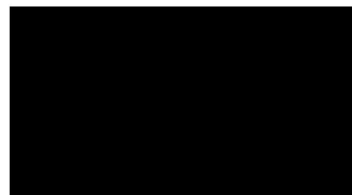
that NGAISSONA lost influence in the Anti-Balaka because he was pursuing his own career.

Interview of Maxime MOKOM, on 21 or 22 February 2015

66. I interviewed Maxime MOKOM on 21 or 22 February 2015. I am not certain as to the exact date. I wanted to interview him because I understood from open source information that he was a leader of the military wing of Anti-Balaka and regarded as influential within the Anti-Balaka. My interpreter called him (I do not have his phone number) and I asked my interpreter to tell Mr MOKOM that I was a researcher and that I was interested in speaking with him. Mr MOKOM agreed to meet with me and my interpreter. I met him at a bar/restaurant called Balafon which is located in BANGUI. This think my interpreter was translating my English into French but he may have spoken Sango, I am not sure. I interviewed him for around 3 hours. We had lunch during the course of the interview. The atmosphere was relaxed and conversational. Mr MOKOM asked several questions about my trip to KAGA-BANDORO and was curious to get my take on the current situation there. I am not sure whether I could recognise MOKOM if was seeing him. I took notes during the interview and labelled them as "Bangui – Intel officer FACA and private consultant" on page 22 of my notes.
67. Mr MOKOM explained the general structure of the Anti-Balaka. Mr MOKOM explained "who was who" in Anti-Balaka. Mr MOKOM explained that he had left the Anti-Balaka as of February 2015 because his objective of expelling the Seleka had been achieved. He explained that he formed part of a group of individuals organizing the resistance against Seleka and to push them out of Bangui. Mr MOKOM explained that it was his duty as a member of FACA to bring back a real government to CAR – namely to bring back the exiled former President BOZIZE. Mr MOKOM explained that after leaving the Anti-Balaka he started business offering private security to individuals and organizations. Mr MOKOM asked if my organization needed his services.
68. During the interview Mr MOKOM told me that the Comzones are the military foundation of the Anti-Balaka. He explained that most Comzones are former FACA and former Presidential Guard. He stated that there are something like 20 powerful Comzones across the country, each commanding something like 50-150 individual members of the Anti-Balaka. He stated that they still take orders from former President BOZIZE. Mr Mokom explained that he was part of organizing the Comzones. He stated he was not a Comzone and my understanding was that he saw himself as being above the Comzone structure. He explained that the Comzones were behind the attack on Bangui on 5 December 2013. He stated that former President BOZIZE and Joachim KOKATE (misspelled in my notes as "Kotate") were the political leaders of the Anti-Balaka. Mr MOKOM noted a few

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notable members of the Anti-Balaka including [REDACTED] a FACA officer and [REDACTED] a lieutenant in FACA. Mr MOKOM stated that [REDACTED]

69. Mr MOKOM also mentioned other individuals in Anti-Balaka: ANDILO and RAMBO. Mr MOKOM explained that ANDILO was not a comzone, but rather he was more of a tribal chief and that he did not have a political agenda. He is just looking for immediate financial gains. Mr MOKOM explained that RAMBO, whose real name was Yekatom Alfred was a Comzone of LOBAYE Prefecture. According to Mr MOKOM, RAMBO had something like 200 fighters and was a FACA Chief Corporal.
70. Mr MOKOM explained that BOZIZE would send money to the Comzones. According to Mr MOKOM, BOZIZE has a lot of money after 10 years in power. He explained to me that members from the Anti-Balaka would go and meet representatives of President BOZIZE in CAMEROON and be handed over cash.
71. Mr MOKOM explained that the leaders of the Anti-Balaka and Seleka had a friendly relationship during the negotiations in Nairobi. Mr MOKOM stated that the senior leaders of each group knew each other. It seemed to me that Mr MOKOM thought that NGAISSONA was trying to take undue credit for the achievements of the Anti-Balaka in expelling the Seleka from Bangui. I say this because Mr MOKOM seemed to be perhaps jealous of the attention on NGAISSONA since Mr MOKOM stated words to the effect that, "in reality, NGAISSONA was side-lined and confined to the Boy Rabe area".

Interview of Sebatien WENEZOU

72. I recall interviewing Sebatien WENEZOU at Grand Café in Bangui but I do not recall specifically when I met him and I cannot find notes that record my recollections of that interview. I am not sure if I met with him in 2014 or 2015. I was with my interpreter and likely conducted the interview in French, but I do not specifically recall. Mr WENEZOU was alone. I am not certain that I would recognize a photograph of Mr WENEZOU.
73. From what I can remember of the interview: Mr WENEZOU was interested in speaking to me about a political party that he had recently established. He wanted to participate in politics and the DDR process. He stated things to the effect of "we are done with the fight now" and "it is time to lay down our weapons and be part of the political solution for our country." He stated that he was a coordinator for the Anti-Balaka and he seemed that he was either a spokesperson or trying to position himself to be a spokesperson.

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74. It is difficult to recall from memory alone the specific things said during the interview but in broad strokes I know we discussed the political situation, the prospects for the DDR process, and aspects of the Anti-Balaka.

July 2015 Research Trip to CAR

75. I again travelled to the CAR to conduct research into the organization of the planned elections there. The objective of the report "The Bangui Carousel: How the recycling of political elites reinforces instability and violence in the Central African Republic" published in August 2016 (see Annexe A) was to discern the extent to which the same Central African elites were recycled through the government. This research involved more data collection than individual interviews and did not specifically look into issues having to do with armed groups.

76. I did not personally witness any active combat activities or any violent criminal activities during all my trips in the CAR.

77. This was the last time I went to the CAR for *Enough*.

ANNEXES

Annex A:

During the course of my interview I mentioned the reports that I produced as a result of my field research for *Enough*. Those reports are still available on the *Enough* website, the OTP Staff downloaded those in a pdf. format on a SD card to annex to my statement. Those reports are the following:

"Blind Spots: Gaining Access to Areas Where the LRA Operates", November 2013

"Seize the Peace: Four Issues to Target Now in the CAR Peace Process", September 2014

"The Bangui Carousel: How the recycling of political elites reinforces instability and violence in the Central African Republic" published in August 2016

"Warlord Business: CAR's violent Armed Groups and their Criminal Operations for Profit and Power" from June 2015

Annex B

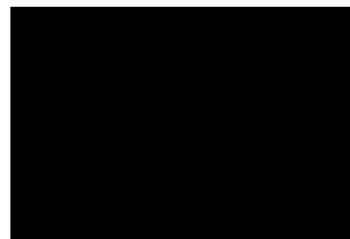
I provided the OTP Staff with an electronic copy of the files that I had kept of my field trips to CAR and which were discussed in the course of my interview. The OTP Staff copied those files from my computer on to an SD card, which was placed into an evidence bag and sealed in front of me. I provided with the OTP Staff with my interview notes:

"Interview notes CAR Trip Feb 07 to 28 2014"

"ALL Interview notes from CAR trip February 2015 full"

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I took some photographs during my February 2014 trip to Bangui. I have provided photographs that were related to the topic discussed during the interview depicting the mostly destroyed house of Joseph [REDACTED] the pictures I took in Saint Joseph IDP camp, and the state-run jewelry shop in Bangui. I placed them in a main folder titled:

Pictures Feb 2014. With sub-folders: IDP CAMP; Jewel Shop; [REDACTED] house.

2014

I provided the OTP Staff with the files that were given to me by two youngsters on 27 February 2014 /anti-Balaka badge. I put those files in a folder titled "BADGE ANTI BAL AKA" which contains the files:

BADGE RECTO

BADGE VERSO

Annex C:

I was asked by the OTP Staff to draw a sketch of NGAISSONA's compound and I indicated the following: terrace (1); house (2); vehicles (3); wooden log outside of the compound (4); staff houses (5), house in front of which I waited before being invited inside the compound (6); compound wall (7); metal gate (8).

Closing Procedure

1. I was informed that I may be called to testify before the Court. It was brought to my attention that ICC trials are held in public and explained to me that, as an exception to the principle of public hearings, the judges may apply protective measures to those testifying if circumstances require.
2. The OTP Staff informed me of the protective measures that may apply during and after the investigation and/or trial proceedings.
3. I have nothing to add to the above statement nor do I have anything to clarify. I am available to be contacted in the future for clarifications or questions on topics not covered during this interview.
4. I have given the answers to the questions of my own free will.
5. There has not been any form of coercion, duress, threat, promise or inducement which has influenced my account.
6. I have no complaints about the way I was treated during this interview.

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WITNESS ACKNOWLEDGMENT

I have read over this statement and it is true to the best of my knowledge and recollection. I have given this statement voluntarily and I am aware that it may be used in legal proceedings before the International Criminal Court and that I may be called to give evidence in public before the International Criminal Court.

Signed: _____

Dated: _____

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