



Original: **English**

No.: **ICC-01/14-01/21**

Date: **20 November 2024**

TRIAL CHAMBER VI

Before: Judge Miatta Maria Samba, Presiding Judge
Judge María del Socorro Flores Liera
Judge Sergio Gerardo Ugalde Godínez
Judge Keebong Paek, Alternate Judge

**SITUATION IN THE CENTRAL AFRICAN REPUBLIC II
IN THE CASE OF *PROSECUTOR* v. *MAHAMAT SAID ABDEL KANI***

**Public
with Public Annex A**

Public Redacted version of “Prosecution’s Application for Submission of Duplicated Documents from the Bar Table pursuant to Article 64(9)”, ICC-01/14-01/21-894-Conf, dated 15 November 2024

Source: Office of the Prosecutor

Document to be notified in accordance with regulation 31 of the *Regulations of the Court* to:

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I. INTRODUCTION

Pursuant to the Decision on the Prosecution’s Applications for Submission of Documents from the Bar Table dated 13 February 2024,¹ the Office of the Prosecutor (“Prosecution”) requests Trial Chamber VI (“Chamber”) to recognise as formally submitted 48 items of evidence from the bar table. These items, set out in Annex A, black font, also comprise their considered ‘duplicate’ material in red font, all previously submitted in the Prosecution’s applications for submission of documents from the bar table pursuant to article 64(9).

II. CONFIDENTIALITY

1. Pursuant to regulation 23*bis*(1) of the Regulations of the Court, the Prosecution files this submission and Annex A confidential because it contains confidential information regarding Prosecution evidence and refers to confidential filings. A public redacted version will be filed as soon as practicable.

III. SUBMISSIONS

2. In compliance with the Chamber’s instructions in its decision,² the Prosecution provides an update on submitted material deemed duplicates. The Prosecution submits that the retained material is relevant to issues at trial, has probative value, and does not unfairly prejudice the Accused Mahamat Said Abdel Kani (“Mr SAID”). The Prosecution provides and explains which duplicates it wishes to formally submit onto the record, where more than one version of the same item is submitted.

A. Duplicated items collected from different sources with the same content

3. CAR-OTP-2005-0324 and CAR-OTP-2034-2768 are partial duplicates as both documents have the same content (*Decree No 13.135*) in black and white and the same number of pages but are collected from different sources, from the [REDACTED] in 2015 and from the [REDACTED] in 2016. The Prosecution requests to formally submit CAR-OTP-2034-2768 which is sufficient to show relevance, probative value and authenticity.

¹ See ICC-01/14-01/21-694, paras. 52-57.

² See ICC-01/14-01/21-694, paras. 52-57.

4. CAR-OTP-2005-0380 and CAR-OTP-2075-0892 are partial duplicates as both documents have the same content (*Decree No. 13.185*) and the same number of pages but are collected from different sources, from the [REDACTED] in 2015 and from the [REDACTED] in 2018. The Prosecution requests to formally submit CAR-OTP-2075-0892 which is sufficient to show relevance, probative value and authenticity.

5. CAR-OTP-2005-0368 and CAR-OTP-2064-0256 are partial duplicates as both documents have similar content (*Decree No. 13.297*) and the same number of pages but are collected from different sources, from the [REDACTED] in 2015 and from the [REDACTED] in 2017. The Prosecution requests to formally submit CAR-OTP-2064-0256 which is sufficient to show relevance, probative value and authenticity.

B. Duplicated items collected from the [REDACTED] with different content (versions and/ or markings)

6. CAR-OTP-2034-2673 and CAR-OTP-2034-2348 are partial duplicates as both documents have similar content and are collected from the same source, the [REDACTED] in 2016 but with different content (different versions of the same document). CAR-OTP-2034-2673 contains one page with one document (*communiqué radio No 0235*) in black and white, annotated “radio Ndekeluka” and signed/ stamped; CAR-OTP-2034-2348 contains four pages with the same annotated document in black and white but also a coloured un-dated/ un-signed version and two other signed black and white versions without the annotation. The Prosecution requests to formally submit CAR-OTP-2034-2348 which is sufficient to show relevance, probative value and authenticity.

7. CAR-OTP-2034-2243 and CAR-OTP-2034-2678 are partial duplicates as both documents have similar content and are collected from the same source, the [REDACTED] in 2016 but with different content (different versions of the same document and markings). CAR-OTP-2034-2243 is a coloured photograph of a document (*communiqué radio No 0304*) annotated “Radio Centrafrique” and CAR-OTP-2034-2678 is a scanned black and white copy of the same document annotated “Radio NDEKE-LUKA”. The Prosecution requests to formally submit CAR-OTP-2034-2243 in colour and with the national radio annotation which is sufficient to show relevance, probative value and authenticity, and which also incorporates the factual proposition that the Seleka had control over the police at the relevant time.

8. CAR-OTP-2034-2242 and CAR-OTP-2034-2680 are partial duplicates as both documents have similar content and are collected from the same source the [REDACTED] in 2016 but with different content (different versions of the same document and markings). CAR-OTP-2034-2242 is a coloured photograph of a document (*communiqué radio No 0323*) annotated “Radio Centrafrique” and CAR-OTP-2034-2680 is a scanned black and white copy of the same document without the annotation. The Prosecution requests to formally submit CAR-OTP-2034-2242 in colour which is sufficient to show relevance, probative value and authenticity.

9. CAR-OTP-2034-2682 and CAR-OTP-2034-2244 are partial duplicates as both documents have similar content and are collected from the same source the [REDACTED] in 2016 but with different content (different versions of the same document). CAR-OTP-2034-2682 is a scanned black and white copy of a document (*communiqué radio No 0324*) and CAR-OTP-2034-2244 is a coloured photograph of the same document. The Prosecution requests to formally submit CAR-OTP-2034-2244 in colour which is sufficient to show relevance, probative value and authenticity.

10. CAR-OTP-2034-3081 and CAR-OTP-2034-2822 are partial duplicates as both documents have similar content and are collected from the same source the [REDACTED] in 2016 but with different content (different versions of the same document). CAR-OTP-2034-3081 is a scanned black and white copy of a document (*ordre de mission*) and CAR-OTP-2034-2822 is a coloured photograph of the same document. The Prosecution requests to formally submit CAR-OTP-2034-2822 in colour which is sufficient to show relevance, probative value and authenticity.

C. Duplicated items collected from the [REDACTED] (same agency) with different content (email chain)

11. CAR-OTP-2124-0725 and CAR-OTP-2124-0805 are partial duplicates as both documents have similar content and are collected from the same source, the [REDACTED] in 2020 but with different content (different email chains/ dates and different format). CAR-OTP-2124-0725 contains one email from [REDACTED] to [REDACTED] on 13 September 2013 with an attachment titled “[REDACTED]” and CAR-OTP-2124-0805 contains two emails, the same email of 13 September 2013 forwarded by [REDACTED] to unknown recipient on 17

September 2013. The Prosecution requests to formally submit CAR-OTP-2124-0805 whose email thread has more information which is sufficient to show relevance, probative value and authenticity.

12. CAR-OTP-2124-0785 and CAR-OTP-2130-3667 are partial duplicates as both documents have similar content and are collected from the same source, the [REDACTED] in 2020 and 2021 but with different content (different email chains/ dates and different format). CAR-OTP-2124-0785 contains ten emails between [REDACTED] and [REDACTED] on 13, 14, 15 and 16 August 2013 and on 17 September 2013; CAR-OTP-2130-3667 contains the same nine emails between [REDACTED] and [REDACTED] on 13, 14, 15 and 16 August 2013 and an additional email on 16 August 2013. The Prosecution requests to formally submit both documents because each document contains exclusive information not found in the other, (email of 17 September 2013 in CAR-OTP-2124-0785 and email of 16 August 2013 in CAR-OTP-2130-3667) which contributes to show relevance, probative value and authenticity.

13. CAR-OTP-2124-0788 and CAR-OTP-2124-0789 are partial duplicates as both documents have similar content and collected from the same source, the [REDACTED] in 2020 but with different content (different email chains and dates). CAR-OTP-2124-0788 contains three emails between [REDACTED] and [REDACTED] on 16 July, 13 August and 17 September 2013; CAR-OTP-2124-0789 contains the same three emails and an additional email from [REDACTED] to [REDACTED] on 17 September 2013. The Prosecution requests to formally submit CAR-OTP-2124-0789 whose email thread has more information which is sufficient to show relevance, probative value and authenticity.

14. CAR-OTP-2124-0823, CAR-OTP-2124-0842 and CAR-OTP-2124-0844 are partial duplicates as these documents have similar content and are collected from the same source, the [REDACTED] in 2020 but with different content (different emails chains and dates). CAR-OTP-2124-0823 contains five emails between [REDACTED] and [REDACTED] on 16 July, 13 August and 17 and 19 September 2013; CAR-OTP-2124-0842 contains the same five emails and an additional email from [REDACTED] to [REDACTED] on 21 September 2013; CAR-OTP-2124-0844 contains the same six emails and an additional email from [REDACTED] to [REDACTED] on 22 September 2013. The Prosecution requests to formally submit CAR-OTP-2124-0844 whose email thread has more information which is sufficient to show relevance, probative value and authenticity.

15. CAR-OTP-2126-2626 and CAR-OTP-2126-2619 are partial duplicates as both documents have similar content and are collected from the same source, the [REDACTED] in 2020 but with different content (different email chains and attachment). CAR-OTP-2126-2626 contains two emails between [REDACTED] and [REDACTED] on 29 May 2013; CAR-OTP-2126-2619 contains only one similar email from [REDACTED] to [REDACTED] on 29 May 2013 but with an attachment titled “[REDACTED]”. The Prosecution requests to formally submit both documents because each document contains exclusive information not found in the other, which contributes to show relevance, probative value and authenticity.

16. CAR-OTP-2126-2627 and CAR-OTP-2126-2628 are partial duplicates as both documents have similar content and are collected from the same source, the [REDACTED] in 2020 but with different content (different email chains). CAR-OTP-2126-2627 contains one email from [REDACTED] to [REDACTED] on 24 June 2013; CAR-OTP-2126-2628 contains the same email and an additional email from [REDACTED] to [REDACTED] on 27 June 2013. The Prosecution requests to formally submit CAR-OTP-2126-2628 whose email thread has more information which is sufficient to show relevance, probative value and authenticity.

17. CAR-OTP-2130-3376 and CAR-OTP-2130-3373 are partial duplicates as both documents have similar content and are collected from the same source, the [REDACTED] in 2021 and attached to the same ‘family group’ document at CAR-OTP-2130-2011 but with different content (different email chains). CAR-OTP-2130-3376 contains two emails between [REDACTED] to [REDACTED] on 5 and 6 October 2013; CAR-OTP-2130-3373 contains only one same email from [REDACTED] to [REDACTED] on 5 October 2013. The Prosecution requests to formally submit CAR-OTP-2130-3376 whose email thread has more information which is sufficient to show relevance, probative value and authenticity.

18. CAR-OTP-2130-3490 and CAR-OTP-2130-3493 are partial duplicates as both documents have similar content and are collected from the same source, the [REDACTED] in 2021 and attached to the same ‘family group’ document at CAR-OTP-2130-2011 but with different content (different email chains and attachment). CAR-OTP-2130-3490 contains one email from [REDACTED] to [REDACTED] on 21 June 2013 with one attachment titled “[REDACTED]”; CAR-OTP-2130-3493 contains the same email without referring to the attachment and an additional email from [REDACTED] to [REDACTED] on 22 June 2013. The Prosecution requests to formally submits both documents because each document contains

exclusive information not found in the other, which contributes to show relevance, probative value and authenticity.

19. CAR-OTP-2130-3504 and CAR-OTP-2130-3501 are partial duplicates as both documents have similar content and are collected from the same source, the [REDACTED] in 2021 and attached to the same ‘family group’ document at CAR-OTP-2130-2011 but with different content (different email chains). CAR-OTP-2130-3504 contains one email from [REDACTED] to [REDACTED] on 24 June 2013; CAR-OTP-2130-3501 contains the same email and an additional email from [REDACTED] to [REDACTED] on 24 June 2013. The Prosecution requests to formally submit CAR-OTP-2130-3501 with the most information which is sufficient to show relevance, probative value and authenticity.

20. CAR-OTP-2130-3543 and CAR-OTP-2130-3560 are partial duplicates as both documents have similar content and are collected from the same source, the [REDACTED] in 2021 and attached to the same ‘family group’ document at CAR-OTP-2130-2011 but with different content (different email chains). CAR-OTP-2130-3543 contains one email from [REDACTED] to [REDACTED] and [REDACTED] on 11 July 2013 including twice a press article titled “[REDACTED]”; CAR-OTP-2130-3560 contains two emails, the same email on 11 July 2013 forwarded by [REDACTED] to [REDACTED] on 17 July 2013. The Prosecution requests to formally submit CAR-OTP-2130-3560 with the most information which is sufficient to show relevance, probative value and authenticity.

21. CAR-OTP-2130-3638, CAR-OTP-2130-3639 and CAR-OTP-2130-3641 are partial duplicates as both documents have similar content and are collected from the same source, the [REDACTED] in 2021 and attached to the same ‘family group’ email at CAR-OTP-2130-2011 but with different content (different email chains and attachment). CAR-OTP-2130-3638 contains one email from [REDACTED] to [REDACTED] on 13 August 2013 with an attachment titled “[REDACTED]”; CAR-OTP-2130-3639 contains two emails, the same email on 13 August 2013 but without the attachment and an additional email from [REDACTED] to [REDACTED] on 13 August 2013; CAR-OTP-2130-3641 contains two emails, the same email of 13 August 2013 with the attachment forwarded by [REDACTED] to [REDACTED] on 13 August 2013. The Prosecution requests to formally submit CAR-OTP-2130-3639 and CAR-OTP-2130-3641 because each document contains exclusive information not found in the other, which contributes to show relevance, probative value and authenticity.

22. CAR-OTP-2124-0895 and CAR-OTP-2124-0896 are partial duplicates as both documents have similar content and are collected from the same source, the [REDACTED] in 2020 but with different content (different email chains). CAR-OTP-2124-0895 contains one email from [REDACTED] to [REDACTED] on 6 October 2013. CAR-OTP-2124-0896 contains the same mail and an additional email from [REDACTED] to [REDACTED] on 6 October 2013. The Prosecution requests to formally submit CAR-OTP-2124-0896 with the most information which is sufficient to show relevance, probative value and authenticity.

23. CAR-OTP-2126-2640 and CAR-OTP-2126-2645 are partial duplicates as both documents have similar content and are collected from the same source, the [REDACTED] in 2020 but with different content (different email chains and attachment). CAR-OTP-2126-2640 contains one email from [REDACTED] to [REDACTED] and [REDACTED] on 21 July 2013 with three attachments titled “[REDACTED]”, “[REDACTED]” and “[REDACTED]”; CAR-OTP-2126-2645 contains the same email without attachments and an additional email from [REDACTED] to [REDACTED] on 21 July 2013. For the above reasons, the Prosecution requests to formally submit both documents because each document contains exclusive information not found in the other, which contributes to show relevance, probative value and authenticity.

D. Duplicated items collected from the [REDACTED] (same agency) with the same content but attached to different ‘family group’ documents (email chain)

24. CAR-OTP-2124-0726 and CAR-OTP-2124-0806 are partial duplicates as both documents have the same content (*memorandum*) and are collected from the same source, the [REDACTED] in 2020 but are attachments to different email chains showing that different persons received the *memorandum* on different dates. CAR-OTP-2124-0726 is a *memorandum* attached to the ‘family group’ document at CAR-OTP-2124-0725 (one email from [REDACTED] to [REDACTED] on 13 September 2013) and CAR-OTP-2124-0806 is the same *memorandum* attached to another family group’ document at CAR-OTP-2124-0805 (two emails, the same email from [REDACTED] to [REDACTED] on 13 September 2013 forwarded by [REDACTED] to unknown recipient on 17 September 2013). The Prosecution requests to formally submit both documents because they are attached to different ‘family group’ documents (submitted email chains CAR-OTP-2124-0725 and CAR-OTP-2124-0805) which contribute to show probative value and authenticity.

25. CAR-OTP-2126-2630, CAR-OTP-2126-2635 and CAR-OTP-2126-2641 are partial duplicates as these documents have the same content (list of needs) and are collected from the same source, the [REDACTED] in 2020 but are attachments to different email chains showing that different persons received the list of needs on different dates. CAR-OTP-2126-2630 contains a list of needs titled “[REDACTED]” attached to a ‘family group’ document at CAR-OTP-2126-2629 (email from [REDACTED] to [REDACTED] on 19 July 2013 with one attachment titled “[REDACTED]”); CAR-OTP-2126-2635 contains the same list attached to a different ‘family group’ document at CAR-OTP-2126-2634 (email from [REDACTED] to [REDACTED] and [REDACTED] on 21 July 2013 with four attachments including “[REDACTED]”); CAR-OTP-2126-2641 contains the same list of needs attached to another ‘family group’ document at CAR-OTP-2126-2640 (email from [REDACTED] to [REDACTED] and [REDACTED] on 21 July 2013 with three attachments including “[REDACTED]”). The Prosecution requests to formally submit all three documents because they are attached to different ‘family group’ documents (submitted email chains CAR-OTP-2126-2629, CAR-OTP-2126-2634 and CAR-OTP-2126-2640) which contribute to show probative value and authenticity.

26. CAR-OTP-2126-2633, CAR-OTP-2126-2637, CAR-OTP-2126-2638 and CAR-OTP-2126-2643 are partial duplicates as these documents have the same content (map of CAR) and are collected from the same source, the [REDACTED] in 2020 but are attachments to different emails chains showing that different persons of interest received this map of CAR on different dates. CAR-OTP-2126-2633 is a map of CAR attached to a ‘family group’ document at CAR-OTP-2126-2629 (email from [REDACTED] to [REDACTED] on 19 July 2013 with one attachment titled “[REDACTED]”); CAR-OTP-2126-2637 and CAR-OTP-2126-2638 are the same map attached to the same ‘family group’ document at CAR-OTP-2126-2634 (email from [REDACTED] to [REDACTED] and [REDACTED] on 21 July 2013 with four attachments including “[REDACTED]” and “[REDACTED]”); CAR-OTP-2126-2643 is the same map attached to another ‘family group’ document at CAR-OTP-2126-2640 (email from [REDACTED] to [REDACTED] and [REDACTED] on 21 July 2013 with three attachments including “[REDACTED]” and “[REDACTED]”). For the above reasons, the Prosecution requests to formally submit CAR-OTP-2126-2633, CAR-OTP-2126-2637 and CAR-OTP-2126-2643 because they are attached to different ‘family group’ documents (submitted email chains CAR-OTP-2126-2629, CAR-OTP-2126-2634 and CAR-OTP-2126-2640) which contribute to show probative value and authenticity.

27. CAR-OTP-2126-2639 and CAR-OTP-2126-2644 are partial duplicates as both documents have the same content (map of CAR with a legend) and are collected from the same source, the [REDACTED] in 2020 but are attachments to different emails chains showing that different persons received this map of CAR on different dates. CAR-OTP-2126-2639 is a map of CAR attached to a ‘family group’ document at CAR-OTP-2126-2634 (email from [REDACTED] to [REDACTED] and [REDACTED] on 21 July 2013 with four attachments including “[REDACTED]” and “[REDACTED]”); CAR-OTP-2126-2644 is the same map attached to another ‘family group’ document at CAR-OTP-2126-2640 (email from [REDACTED] to [REDACTED] and [REDACTED] on 21 July 2013 with three attachments including “[REDACTED]” and “[REDACTED]”). For the above reasons, the Prosecution requests to formally submit both documents because they are attached to different ‘family group’ documents (submitted email chains CAR-OTP-2126-2634 and CAR-OTP-2126-2640) which contribute to show probative value and authenticity.

28. CAR-OTP-2126-2647 and CAR-OTP-2126-2698 are partial duplicates as both documents have the same content (list of needs) and are collected from the same source, the [REDACTED] in 2020 but are attachments to different emails chains showing that different persons received this list of needs on different dates. CAR-OTP-2126-2647 contains a list of needs titled “[REDACTED]” attached to a ‘family group’ document at CAR-OTP-2126-2646 (email from [REDACTED] to [REDACTED] on 26 July 2013 with three attachments including “[REDACTED]”); CAR-OTP-2126-2698 contains the same list attached to a different ‘family group’ document at CAR-OTP-2126-2697 (email from [REDACTED] to [REDACTED] on 27 July 2013 with one attachment titled “[REDACTED]”). For the above reasons, the Prosecution requests to formally submit both documents attached to different ‘family group’ documents (submitted email chains CAR-OTP-2126-2646 and CAR-OTP-2126-2697) which contribute to show probative value and authenticity.

29. CAR-OTP-2126-2651 and CAR-OTP-2126-2703 are partial duplicates as both documents have the same content (list of requested information) and are collected from the same source, the [REDACTED] in 2020 but are attachments to different emails chains showing that different persons received this list of requested information on different dates. CAR-OTP-2126-2651 contains a list of requested information titled “[REDACTED]” attached to a ‘family group’ document at CAR-OTP-2126-2646 (email from [REDACTED] to [REDACTED] on 26 July 2013 with three attachments including “[REDACTED]”); CAR-OTP-2126-2703 contains

the same list attached to a different ‘family group’ document at CAR-OTP-2126-2702 (email from [REDACTED] to [REDACTED] on 27 July 2013 with one attachment “[REDACTED]”). The Prosecution requests to formally submit both documents attached to different ‘family group’ documents (submitted email chains CAR-OTP-2126-2646 and CAR-OTP-2126-2702) which contribute to show probative value and authenticity.

30. CAR-OTP-2126-2719 and CAR-OTP-2126-2723 are partial duplicates as both documents have the same content (list of dignitaries) and are collected from the same source, the [REDACTED] in 2020 but are attachments to different email chains showing that different persons received this list of dignitaries on different dates. CAR-OTP-2126-2719 contains a list of dignitaries titled “[REDACTED]” attached to a ‘family group’ document at CAR-OTP-2126-2718 (email from [REDACTED] to [REDACTED] on 1 August 2013 with one attachment titled “[REDACTED]”); CAR-OTP-2126-2723 contains the same list attached to a different ‘family group’ document at CAR-OTP-2126-2722 (email from [REDACTED] to [REDACTED] on 1 August 2013 with one attachment titled “[REDACTED]” and another email from [REDACTED] to [REDACTED] on 31 August 2013). For the above reasons, the Prosecution requests to formally submit both documents attached to different ‘family group’ documents (submitted email chains CAR-OTP-2126-2718 and CAR-OTP-2126-2722) which contribute to show probative value and authenticity.

E. Duplicated items collected from the [REDACTED] (same agency) with the same content (email chain)

31. CAR-OTP-2130-3491 and CAR-OTP-2130-3498 are partial duplicates as both documents have similar content and are collected from the same source, the [REDACTED] in 2021 and attached to the same ‘family group’ document at CAR-OTP-2130-2011 and with identical content (email chain). CAR-OTP-2130-3491 and CAR-OTP-2130-3498 contains five emails with the same senders and recipients on 21 May, 18 and 22 June 2013. The Prosecution requests to formally submit CAR-OTP-2130-3491, collected first, which is sufficient to show relevance, probative value and authenticity.

F. Duplicated items from the [REDACTED] but from different agencies and with different content (email chain)

32. CAR-OTP-2130-3379, CAR-OTP-2124-0890, CAR-OTP-2124-0891 and CAR-OTP-2124-0892 are partial duplicates as these documents have similar content and are collected from the same source, the [REDACTED] but from different agencies and with different content (different email chains and dates). One document, CAR-OTP-2130-3379 is sourced from the [REDACTED] in 2021 while three documents CAR-OTP-2124-0890, CAR-OTP-2124-0891 and CAR-OTP-2124-0892 are sourced from the [REDACTED] in 2020. CAR-OTP-2130-3379 contains four emails between [REDACTED] and [REDACTED] on 5 and 6 October 2013; CAR-OTP-2124-0890 contains only one same email from [REDACTED] to [REDACTED] on 5 October 2013; CAR-OTP-2124-0891 contains three same emails between [REDACTED] and [REDACTED] on 5 and 6 October 2013; CAR-OTP-2124-0892 contains the same four emails between [REDACTED] and [REDACTED] on 5 and 6 October 2013. The Prosecution requests to formally submit CAR-OTP-2130-3379 whose email thread has more information which is sufficient to show relevance, probative value and authenticity.

33. CAR-OTP-2130-3383 and CAR-OTP-2124-0899 are partial duplicates as both documents have similar content and are collected from the same source, the [REDACTED] but from different agencies and with similar content (different format). CAR-OTP-2130-3383 is sourced from the [REDACTED] in 2021 and contains one email from [REDACTED] to [REDACTED] on 7 October 2013 while CAR-OTP-2124-0899 is sourced from the [REDACTED] in 2020 and contains the same email but in a different format. The Prosecution requests to formally submit CAR-OTP-2130-3383 which is sufficient to show relevance, probative value and authenticity.

34. CAR-OTP-2130-3385, CAR-OTP-2124-0901, and CAR-OTP-2124-0903 are partial duplicates as these documents have similar content and are collected from the same source, the [REDACTED] but from different agencies and with different content (different email chains and dates). CAR-OTP-2130-3385 is sourced from the [REDACTED] in 2021 containing one email from [REDACTED] to [REDACTED] on 13 October 2013; CAR-OTP-2124-0901 and CAR-OTP-2124-0903 are sourced from the [REDACTED] in 2020: CAR-OTP-2124-0901 contains two emails, one email from [REDACTED] to [REDACTED] on 12 October 2013 forwarded by [REDACTED] to [REDACTED] on 15 October 2013; CAR-OTP-2124-0903

contains three emails, the same two emails and an email from [REDACTED] to [REDACTED] on 17 October 2013. The Prosecution requests to formally submit CAR-OTP-2130-3385 because it contains exclusive information not found in the other documents and CAR-OTP-2124-0903 whose email thread has more information. Both items are sufficient to show relevance, probative value and authenticity.

G. Duplicated items from the [REDACTED] with different content (versions)

35. CAR-OTP-2002-2105 and CAR-OTP-2027-1822 are partial duplicates as both documents have the same content and are collected from the same source, the [REDACTED] in 2015 and 2016 respectively. CAR-OTP-2002-2105 contains 12 pages of '*PV de declaration No 427*' by P-1519 and CAR-OTP-2027-1822 contains the same '*PV de declaration*' but with some amendments to the document: a) at ERN page 1822, a corrected title "Assassinat" to previous title "Ass + Vol"; b) at ERN page 1823, an additional name "[REDACTED]" to previous name "[REDACTED]"; c) at ERN page 1826, an additional signature and names with "[REDACTED]"; and d) at ERN page 1832, an additional "attestation de residence" dated [REDACTED] and stamped for [REDACTED]. For the above reasons, the Prosecution requests to formally submit CAR-OTP-2027-1822 with the most up to date relevant information which is sufficient to show relevance, probative value and authenticity.

IV. CONCLUSION

36. For the above reasons, the Prosecution respectfully requests to formally submit onto the case record 48 documents as set out in Annex A.



Karim A. A. Khan KC, Prosecutor

Dated this 20th day of November 2024
At The Hague, The Netherlands