

**Cour
Pénale
Internationale**



**International
Criminal
Court**

Original: English

No.: ICC-02/04-01/15
Date: 30 October 2025

TRIAL CHAMBER II

Before: Judge María del Socorro Flores Liera, Presiding Judge
Judge Kimberly Prost
Judge Nicolas Guillou

SITUATION IN UGANDA

IN THE CASE OF THE PROSECUTOR v. DOMINIC ONGWEN

Public

Registry Request for Extension of Time

Source: Registry

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

- | | |
|--|--|
| ☐ The Office of the Prosecutor | ☐ Counsel for the Defence |
| ☐ Legal Representatives of the Victims | ☐ Legal Representatives of the Applicants |
| ☐ Unrepresented Victims | ☐ Unrepresented Applicants (Participation/Reparation) |
| ☒ The Office of Public Counsel for Victims | ☐ The Office of Public Counsel for the Defence |
| ☐ States' Representatives | ☐ Amicus Curiae |

REGISTRY

- | | |
|---|---|
| Registrar
M. Zavala Giler, Osvaldo | ☐ Counsel Support Section |
| ☐ Victims and Witnesses Unit | ☐ Detention Section |
| ☒ Victims Participation and Reparations Section | ☒ Other
Trust Fund for Victims |

I. Introduction

1. In the Reparations Order issued on 28 February 2024 (“Order”), Trial Chamber IX ordered the Registry, through its Victims Participation and Reparations Section (“VPRS” or the “Section”), to administer the eligibility process for reparations in the case of *The Prosecutor v. Dominic Ongwen* (“Case”) —namely by: *i*) identifying potential beneficiaries of reparations; *ii*) assessing their eligibility and priority category based on criteria set out in the Order; and *iii*) communicating the assessment results with applicants and the Trust Fund for Victims (“TFV”).¹ The Order further instructed the VPRS to complete this process for a “conservative minimum estimate”² of 49,772 eligible victims within two years from the date of the Order.³
2. The Registry hereby requests an extension of time for a period considered appropriate by the Chamber for the VPRS to continue its administrative eligibility process, with permission to provide status updates in four-month intervals during the extension period.

II. Procedural History

3. On 28 February 2024, Trial Chamber IX issued the Order in which it instructed the VPRS to proceed with the administrative eligibility process outlined above and provide “an estimate as to the time it requires to assess eligibility and urgent needs of all participating victims”.⁴
4. On 12 March 2024, the Presidency of the International Criminal Court (“Court”) referred the Case to Trial Chamber II (“Chamber”).⁵

¹ Trial Chamber IX, “Reparations Order”, 28 February 2024, ICC-02/04-01/15-2074, paras. 808-812.

² Order, para. 704. As clarified in the Order, this estimate “should not be understood as a limit on the maximum number of individuals who may come forward and be considered eligible to benefit from the award”. *Ibid.*, para. 777. Indeed, the Registry estimates the total number to be greater.

³ *Ibid.*, paras. 748, 813.

⁴ *Ibid.*, para. 810(c).

⁵ Presidency, “Decision assigning judges to divisions and recomposing Chambers”, 12 March 2024, ICC-02/04-01/15-2079.

5. On 2 April 2024, the Registry filed its submissions pursuant to the Order (“Registry Submissions”), undertaking to complete the assessments for all participating victims “by the end of 2024, or the first months of 2025 at the latest” contingent on “the timely receipt of relevant information from victims”,⁶ and seeking clarification on certain criteria for assessment.⁷ For the remainder of the estimated number of eligible beneficiaries, the Registry assured to do its utmost to work towards the set target by February 2026.⁸
6. On 3 May 2024, the Chamber issued its decision on the Registry Submissions, acknowledging the projection and responding to the requests for clarification (“Decision”).⁹

III. Applicable Law

7. The Registry submits this filing in accordance with regulation 35 of the Regulations of the Court.

IV. Submissions

8. The Registry’s submissions are organized in four parts: *i*) an overview of the current processing status; *ii*) key challenges faced; *iii*) projections based on the current capacity; and *iv*) the request for extension of time.

i. Current Processing Status

9. As of the date of this filing, the VPRS’ assessment process is fully operational, with monthly transmissions to the TFV underway.¹⁰ Pursuant to the Order, the

⁶ Registry, “Registry Submissions pursuant to Reparations Order ICC-02/04-01/15-2074”, 2 April 2024, ICC-02/04-01/15-2082, para. 25 and footnote 52.

⁷ Registry Submissions, paras. 12-24.

⁸ *Ibid.*, para. 26.

⁹ Trial Chamber II, “Decision on Registry Submissions pursuant to Reparations Order ICC-02/04-01/15-2074”, 3 May 2024, ICC-02/04-01/15-2088.

¹⁰ The VPRS has made six transmissions in 2025 so far, dated 17 April, 18 June, 16 July, 27 August, 17 September and 15 October.

VPRS has proceeded with a two-part assessment: a review for reparations eligibility in the Case, followed by a priority analysis for all eligible victims based on their urgent needs and vulnerabilities.¹¹ The Section began by compiling all criteria for both assessments based on the Order and its Annex I¹² and shared the resulting compilations with the Chamber, the TFV, the Office of Public Counsel for Victims (“OPCV”) and Mr Joseph Akwenyu Manoba and Mr Francisco Cox (“LRVs”)¹³ for transparency and coordination.¹⁴ These standards have been used to design new forms for reparations in the Case and for all assessments to date.

10. In its processing, the Section has dealt with three categories of potential reparations beneficiaries: *i)* participating victims, *ii)* victims who were previously identified but did not participate in the Case, and *iii)* newly identified victims.

11. For *i) participating victims*, the VPRS has assessed information it has available to date and continues to analyse new input when received.¹⁵ Nonetheless, a substantial number of dossiers of participating victims still require additional

¹¹ Order, para. 810. The first priority is to be given to “vulnerable victims in dire need of urgent assistance”; the second priority to “vulnerable direct participating victims”; the third priority to “all remaining vulnerable victims”; and the fourth priority to “all remaining non-vulnerable victims”. *Ibid.*, paras. 659-662.

¹² For reparations eligibility, the Order requires applicants to establish identity, victimhood, harm, and causal link. *Ibid.*, para. 435. After compiling the relevant standard of proof, evidentiary requirements, and presumptions set out in the Order, the VPRS reviewed Trial Chamber IX’s assessment of applications in Annex I to the Order as well as previous decisions and judgments in the Case to further clarify the details of the eligibility criteria. For prioritization, the Order set out eight vulnerability categories: “individuals who require immediate physical and/or psychological medical care, victims with disabilities[,] the elderly, victims of sexual or gender-based violence, victims who are homeless[, victims] experiencing financial hardship, as well as children born out of rape and sexual slavery and former child soldiers”. *Ibid.*, para. 655. To tailor the analysis to the situation in Northern Uganda, the VPRS further contextualized these eight categories with information collected in the field and desk research on country conditions.

¹³ Activities of the LRVs have been limited pursuant to para. 812(b) of the Order and in accordance with the Court’s Legal Aid Policy. See footnote 25 below.

¹⁴ The compilations were also incorporated in simplified forms into the messages of the VPRS and the Public Information and Outreach Section (“PIOS”), as well as intermediary trainings and stakeholder meetings in Uganda.

¹⁵ Everything received up to 14 October 2025 has been fully processed. New information and materials received for more than 200 victims on 15 October 2025 and afterwards are currently under review.

information. Efforts, in most cases towards actually locating the relevant victims, are ongoing.

- a. For reparations eligibility, pursuant to the Order and the Decision, the Section reviewed the dossiers of victims who suffered harm as a result of the attacks on the four internally displaced people (“IDP”) camps for which Mr Ongwen was convicted, to check for their identity and their residence or physical presence at the time of the attacks.¹⁶ The VPRS also conducted new assessments for victims previously found ineligible in Annex I to the Order,¹⁷ and for victims who suffered harm exclusively as a result of the thematic crimes for which Mr Ongwen was convicted.
- b. For prioritization and resumption of action (“RoA”), the Section assessed most information and documents received to date, but input from the victims’ legal representatives remains incoming.¹⁸
- c. In total, the VPRS has made transmissions to the TFV for 2,282 eligible participating victims. As of the latest transmission in October 2025, 30 participating victims required additional information to be considered eligible, 1,692 required information for priority assessments and 60 were deceased with their RoA documents incomplete or pending.¹⁹ The Section continues to work closely with the OPCV and the LRVs for

¹⁶ Decision, para. 7. This review consisted of two parts. For the first part, the Section confirmed that its Rule 85 assessments for the Case used physical presence or residence at one of the IDP camps at the time of the attacks as its basis for categorizing applicants as “direct victims”, and then reviewed all “indirect victims” of the four IDP camp attacks for indications of physical presence or residence using the balance of probabilities standard. For the second part, the VPRS reviewed the IDP camp attack victims’ identity documents for substantial discrepancies in age or date of birth information and sought clarification for such discrepancies.

¹⁷ Order, para. 510.

¹⁸ Pursuant to para. 810(b)(i) of the Order, victims’ legal representatives have been providing the VPRS with vulnerability and urgent needs information of participating victims. The OPCV provided information for all 1,502 victims on 18 July 2024, of which 14 were assessed as having no information on applicable vulnerabilities. The LRVs have been providing input in batches, with eight batches of information received from 14 October 2024 to 15 October 2025. Where no relevant information was provided for a participating victim, but age or thematic crime based vulnerabilities applied, the VPRS proceeded with the priority assessment and informed the legal representatives.

¹⁹ The figures represent the Section’s assessment status as of the transmission in October 2025. See footnote 15 above.

outstanding components as well as up-to-date contact details of eligible victims.²⁰

12. For *ii) victims who were previously identified but did not participate* in the Case, the VPRS conducted *de novo* eligibility assessments and sought clarification where relevant. This included (a) applications that were rejected at the pre-trial or trial stage of the Case proceedings and (b) applications that were not transmitted on the record of the Case.

- a. Previously rejected applications were screened for victims that were potentially within the scope of the Case but dismissed based on discrepancies. The Section has sought clarification for the inconsistencies and continues to reassess dossiers when additional information is received.
- b. Applications not transmitted were forms that the VPRS received but did not transmit on the record due to questions of causal link.²¹ The Section has reassessed these applications and is in the process of seeking and receiving additional information to assess the priority categories of victims who would now be considered eligible for reparations based on the Order and the balance of probabilities standard.

13. For *iii) newly identified victims*, the VPRS is identifying victims and collecting their applications for reparations through its network of intermediaries situated in 19 districts across Northern Uganda. The Section has invested in a strong IT capacity in the collection of victim information in order to meet relevant targets. To this end, the Section has developed electronic forms using the platform of an online provider, making available individual and group-based (so called “household”) forms tailored to the Case. Intermediaries have been trained and

²⁰ As part of such coordination, the Section periodically shares with the respective legal representative teams its assessment results and reminders about pending components (e.g., incomplete RoA). The latest comprehensive updates were provided to each team via email on 22 September 2025.

²¹ This primarily concerns children born after the four IDP camp attacks who suffered harm by growing up in the incidents’ aftermath, and family members who joined victims’ households after victimization but suffered subsequent harm alongside the victims (e.g., spouse to a direct victim of an IDP camp attack).

equipped with tablets to collect the forms, with a focus on completing household forms to ensure that more victims can be reached through the administrative eligibility process. However, the development of these forms, the distribution of equipment, and the training of field clerks in using the IT tools required substantial time, with the roll out taking place in the spring of 2025.

14. With the above approach and the expansion of its field network, the VPRS has substantially increased its capacity on the ground throughout 2025. From July to October 2025, the Section collected approximately 3,200 applications from newly identified victims; as most of these were household forms, the applications covered more than 10,000 victims. The newly collected applications are now being registered and reviewed, alongside information and documents the Section continues to receive and assess for existing applications.
15. To date, the total number of victims transmitted to the TFV—2,356 eligible beneficiaries—represents roughly 5% of the target minimum estimate given in the Order;²² the total number of victims for whom the Section has received applications for reparations, if assessed to be eligible, would represent around 30% of the target.

ii. Key Challenges

16. The Registry first recalls that the estimated number of victims eligible for reparations in this Case is approximately five times greater than in the case of *The Prosecutor v. Bosco Ntaganda* (“the Ntaganda case”); however, the same two-year timeframe has been mandated for the eligibility process in both cases.²³

²² Transmissions to the TFV have included eligible beneficiaries’ dossiers alongside information on their priority categories, contacts, and other details requested by the TFV to facilitate the implementation of reparations. As the TFV is required to follow up with eligible beneficiaries within 30 days of VPRS’ notification to the relevant victims (Order, para. 810(f)), the Section has developed an IT tool that automatically informs the TFV upon such notification. VPRS and TFV have engaged in regular discussions to coordinate this process.

²³ Registry Submissions, para. 26. The Registry also notes that the VPRS shared a 1.5 to 2 years’ estimate for the administrative process assuming the best case scenario—with, *inter alia*, 60 local contractors and a group-based household form used for the full duration of the process. Registry, “Annex II to the

Along with the scale of operations required, the Registry has faced a number of additional and interconnected challenges—some of which have been beyond the VPRS' control.

17. For participating victims, a key challenge has been the substantial level of coordination and information exchange needed with the victims' legal representatives—in part because for many victims, the contact details on file in the VPRS' internal database were no longer accurate. To carry out its assessments and follow-up contacts with victims, the VPRS required information from the OPCV and the LRVs as to the victims' current needs for prioritization purposes, as well as their up-to-date contacts. The legal representatives have been supplying the Section with relevant input, but the information transfer is still ongoing.²⁴ Of note, the LRVs have been operating with a reduced budget and capacity due to the current procedural stage of the case and relevant allotments pursuant to the Court's Legal Aid Policy.²⁵
18. For victims newly identified by the Section, a major challenge has been the secure and efficient integration of digital forms collected through its new IT tool into the Section's central database. Additional time is required to fully synchronize the data systems, an obstacle that may be compounded by the Court's recent initiatives to further strengthen its IT structure. Potential changes to the Court's use of cloud services, for instance, have prompted the Section to develop alternatives for data collection in the field. While suitable options are being explored, this need has impacted the Section's capacity to process the

Registry's Mapping Report and Submission on Reparations", 6 December 2021, ICC-02/04-01/15-1919-AnxII, footnote 30.

²⁴ As of 15 October 2025, information was outstanding for 1,822 participating victims—83 of which were represented by the OPCV and 1,739 by the LRVs. See footnote 15 above for materials currently under review. Given their interactions with victims for the vulnerability and dire needs information pursuant to the Order, victims' legal representatives have been transmitting the victims' up-to-date contact details as well as supplementary information for issues of eligibility. In the process, the LRVs have reported difficulty in locating some of their clients—an issue the VPRS also anticipates for some of the victims found to be eligible for reparations.

²⁵ Assembly of State Parties, "Draft Legal aid policy of the International Criminal Court", 22 November 2023, ICC-ASP/22/9, paras. 67-73. At the implementation phase of reparations, a maximum lump-sum of EUR 60,000 is applicable.

forms newly received. The VPRS is working on such alternative solutions alongside efforts to automate data entry for the new digital forms in order to reduce disparity between the incoming data and the Section's capacity to process and analyse the data.

iii. Projections

19. At its current capacity, each month, the VPRS collects around 800 household forms in the field (representing an estimate of 2,400 victims²⁶) and processes around a quarter of them at the headquarters' level.²⁷
20. Assuming the Section can maintain and gradually expand this processing capacity (and most newly identified victims can be assessed as eligible for reparations without supplementary information), the VPRS expects to transmit to the TFV information on approximately 6,000 eligible victims by the original deadline.²⁸
21. The VPRS aims to increase its processing speed in 2026. This would be the expected combined effect of the improved data collection capacity and the ongoing efforts to optimize the Section's resources, such as the incorporation of additional automation steps and the onboarding of additional personnel. If successful, these latter initiatives would also have a notable impact on the Section's future output. Further cooperation with the TFV may also help accelerate the pace.
22. While progress expected by the original deadline falls shy of the estimate target by a significant margin, the VPRS considers that its tools and processes currently in place or in active development would, if operations were to be continued for a year or more, help ensure that a meaningful number of

²⁶ Based on forms received to date, one household form includes three applicants on average.

²⁷ Projections are given in terms of household forms, as they are being filled out as a matter of priority. Aligning the Section's capacity for form collection and form processing will require resolving issues noted in para. 18 above.

²⁸ This estimate is a rough sum of participating victims that do not have outstanding issues of eligibility as of the date of this filing and other victims that would be assessed throughout the months leading up to the original deadline in February 2026.

victims—ideally, as many as the targeted 49,772—would benefit from reparations in the Case.

iv. Request for Extension of Time

23. Based on the challenges and projections above, the Registry hereby submits that there is good cause shown to grant an extension of time as deemed appropriate by the Chamber for the VPRS to continue its administrative eligibility process.²⁹ If granted the extension, the Registry will continue to monitor developments for reparation implementation in the Case³⁰ and work in close collaboration with the TFV to minimize negative impacts on implementation.³¹
24. Additionally, the Registry offers to provide periodic updates every four months during the extension period.
25. Finally, for participating victims, the Registry undertakes to finalize the assessments and transmissions to the TFV by the original deadline of 28 February 2026.³² To this end, as the step is contingent on receiving all relevant information, the VPRS will set 15 December 2025 as the final deadline for all input from the victims' legal representatives for participating victims, so that there remains sufficient time to process the information within the original timeline.

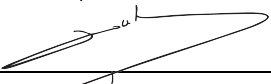
²⁹ Regulations of the Court, Reg. 35(2) ("The Chamber may extend or reduce a time limit if good cause is shown and, where appropriate, after having given the participants an opportunity to be heard.").

³⁰ The Registry is mindful of the challenges inherent in raising funds for reparations and the resulting reality that implementation of reparations in the Case may also require time. According to the first update report on the implementation of reparations the Case, dated 18 June 2025, TFV described the current stage as "the preparatory phase of the programme" and remarked that "[n]o contributions in 2024, or so far in 2025 have been earmarked to the Ongwen Reparation Programme". TFV, "Trust Fund for Victims' First Update Report on the implementation of reparations in the Ongwen case", 18 June 2025, ICC-02/04-01/15-2109, paras. 13, 98. As noted in the report, resources for this Case will have to be balanced with the needs of other cases with reparations programmes, including *The Prosecutor v. Ahmad Al Faqi Al Mahdi*, *The Prosecutor v. Thomas Lubanga Dyilo* and the *Ntaganda* case. *Ibid.*, para. 98. The needs for other cases will continue to grow, namely in *The Prosecutor v. Alfred Yekatom and Patrice-Edouard Ngaïssona* and *The Prosecutor v. Ali Muhammad Ali Abd-Al-Rahman* ("Ali Kushayb").

³¹ The VPRS continues to have joint meetings with the TFV and the PIOS every two months for coordination in this Case. Both TFV and PIOS were briefed on the present extension request.

³² For victims with outstanding issues of eligibility, this would mean categorizing them as not eligible. For victims with outstanding issues of prioritization, this would mean categorizing them as not vulnerable (i.e., priority category 4).

26. The Registry remains committed to administering the process as efficiently as possible and will continue identifying and implementing measures to increase its efficiency.



Marc Dubuisson, Director, Division of Judicial Services
on behalf of
Osvaldo Zavala Giler, Registrar

Dated this 30 October 2025

At The Hague, The Netherlands