

**Cour
Pénale
Internationale**



**International
Criminal
Court**

Original: *English*

No.: ICC-02/05-01/20
Date: 14 November 2025

TRIAL CHAMBER I

Before: Judge Joanna Korner, Presiding Judge
Judge Reine Alapini-Gansou
Judge Althea Violet Alexis-Windsor

SITUATION IN DARFUR, SUDAN

**IN THE CASE OF
THE PROSECUTOR v. ALI MUHAMMAD ALI ABD-AL-RAHMAN
("ALI KUSHAYB")**

**PUBLIC
With PUBLIC Annex 1**

Defence report further to paragraph 99 of the Defence's Sentencing Brief

Source: Defence for Mr Ali Muhammad Ali Abd-Al-Rahman

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

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| ☒ 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
Mr Osvaldo Zavala Giler | ☐ Counsel Support Section |
| ☐ Victims and Witnesses Unit | ☐ Detention Section |
| ☐ Victims Participation and Reparations Section | ☒ Other
Ms. Deborah Ruiz Verduzco, Executive
Director of the Secretariat of the Trust Fund
for Victims
Members of the Board of Directors of the
Trust Fund for Victims |

1. At paragraph 99 of its Sentencing Submissions,¹ the Defence for Mr Ali Muhammad Ali Abd-Al-Rahman (“Defence”, “Mr Abd-Al-Rahman”) informed Trial Chamber I (“the Chamber”), the Office of the Prosecutor (“OTP”) and the Legal Representative of Victims (“LRVs”) of its meeting of 4 November 2025 with representatives of the Trust Fund for Victims (“TFV”). At the time of submitting its Sentencing Submissions, the Defence had not had the opportunity of reporting its discussions with the TFV to Mr Abd-Al-Rahman, nor to discuss follow-up action. As announced, the Defence will address that topic orally during the forthcoming hearing on sentencing. Nevertheless, the Defence deems it appropriate to inform the Chamber, the OTP and the LRV of its actions, as instructed by Mr Abd-Al-Rahman.
2. On 11 November 2025, the Defence addressed letters calling for earmarked donations for the benefit of victims in the Darfur Situation to the Embassies of 54 Non-State Parties.² Non-State Parties were prioritized because the TFV had indicated on 4 November 2025 that these were not the primary targets of its fundraising activities. The Defence could thus approach them without impacting on the TFV’s fundraising strategy.
3. On 12 November 2025, the Defence informed the TFV of these letters and of its intent to also send similar letters to States Parties by the end of the week. Because States Parties are the natural targets of the TFV fundraising activities, the Defence invited the TFV to indicate whether it would prefer to have a prior consultation with the Defence on its intended action, in which case the Defence would wait before sending its letters to States Parties.³ The TFV did not require further consultations. On Friday, 14 November 2025, the Defence sent a further batch of the same letter to the Embassies of 114 States Parties,⁴ for a total 168 States.
4. A third batch is in preparation, targeting this time private donors. The Defence will further update the Chamber at the hearing on sentencing.
5. The template letter addressed to States is annexed to the present submission.

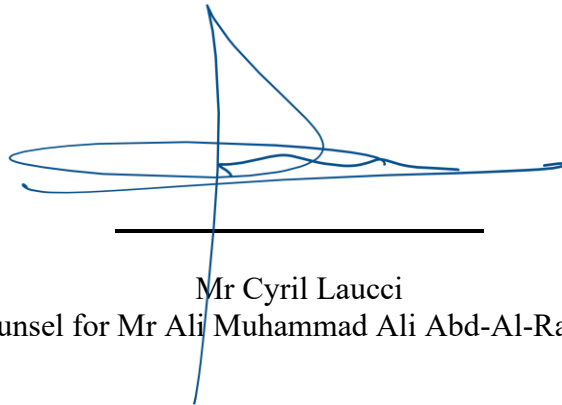
¹ ICC-02/05-01/20-1259-Conf-Corr

² Algeria, Angola, Azerbaijan, Bahrain, Bangladesh, Bielorussia, Brunei-Darussalam, Burundi, Cameroon, China, Comoros, Egypt, Equatorial Guinea, Eritrea, Ethiopia, Guinea Bissau, India, Indonesia, Iran, Iraq, Kazakhstan, Kuwait, Laos, Lebanon, Libya, Malaysia, Mauritania, Morocco, Mozambique, Myanmar, Nepal, Oman, Pakistan, Papua New Guinea, Philippines, Qatar, Russia, Rwanda, Sao Tomé and Príncipe, Saudi Arabia, Singapore, Somalia, South Sudan, Sri Lanka, Syria, Thailand, Togo, Turkey, United Arab Emirates, Uzbekistan, Vietnam, Yemen, Zimbabwe.

³ Email to the TFV, 12 November 2025, 9h40 a.m..

⁴ The Defence is yet to find a contact address for the following States: Antigua and Barbuda, Congo, Cook Islands, Côte d’Ivoire, Dominica, Fiji, Gambia, Liechtenstein, Malta, Marshall Islands and Nauru. The letters will be sent as soon as possible.

Respectfully submitted,



Mr Cyril Laucci
Counsel for Mr Ali Muhammad Ali Abd-Al-Rahman

Dated this 14 November 2025

At The Hague, The Netherlands.