

**Cour
Pénale
Internationale**



**International
Criminal
Court**

Original: English

No.: ICC-01/14-01/18
Date: 3 December 2025

TRIAL CHAMBER V

Before: Judge Betti Hohler, Presiding judge
Judge Joanna Korner
Judge Keebong Paek

SITUATION IN THE CENTRAL AFRICAN REPUBLIC II

**IN THE CASE OF
*THE PROSECUTOR v. ALFRED YEKATOM AND
PATRICE-ÉDOUARD NGAÏSSONA***

Public Redacted Version of No. ICC-01/14-01/18-2854-Conf-Exp

**Common Legal Representatives of Victims' Response
to the Requests for leave to submit observations pursuant to Rule 103 of the Rules
of Procedure and Evidence**

Source: Common Legal Representatives of Victims of Other Crimes

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

D29

D30

☒ Legal Representatives of the Victims
V44

☐ 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

Queen's University Belfast Human
Rights Centre

Association des réintégrés en
Centrafrique - Arc en Ciel

I. INTRODUCTION

1. The Common Legal Representative of the Victims of the Other Crimes (the “CRLV”) hereby file their response to the request for leave to file observations in the reparations proceedings submitted by two organisations.

2. On the application by the Queen’s University Belfast Human Rights Centre (the “Queen’s University Request”), the CLRV consider appropriate and useful the submission of observations in light of the applicant’s specific expertise in the matter *sub judice*,¹ provided that Trial Chamber V (the “Chamber”) requires the applicant, if authorised, to submit observations on the basis of information already in its possession. The CLRV indeed oppose the proposed collection of information by way of interactions with the affected communities.

3. On the application by Mr Bengo-Gate on behalf of the *Association des réintégrés en Centrafrique - Arc en Ciel* (the “Arc en Ciel Request”),² the CLRV oppose it on the basis: (i) that the organisation lacks relevant proven expertise in the matter *sub judice*; and (ii) [REDACTED].

¹ See the Registry Transmission of “Request for leave to file submission on reparations issues pursuant to Article 75 of the Statute”, [No. ICC-01/14-01/18-2833](#), 4 November 2025, with one public [Annex](#) (the “Queen’s University Request”).

² See the Registry Transmission of “*Demande d’autorisation de presenter des observations*”, [No. ICC-01/14-01/18-2843](#), 17 November 2025, with six confidential annexes (the “Arc en Ciel Request”).

II. CONFIDENTIALITY

4. The present submission is filed *ex parte* only available to the CLRV and the Registry because it contains information related to victims involved in other cases before the Court, as well as information in possession of the Registry currently bearing the same classification. A confidential redacted and a public redacted version are filed simultaneously.

III. PROCEDURAL BACKGROUND

5. On 8 October 2025, the Chamber in its new composition issued the “Order for Submissions on Reparations” (the “Order”),³ setting a calendar for the reparations proceedings and inviting “[a]ny persons or organisations, particularly with local expertise, interested in making submissions” to request leave, pursuant to rule 103 of the Rules of Procedure and Evidence (the “Rules”), by 14 November 2025.⁴

6. On 4 November 2025, the Registry transmitted a request from the Queen’s University for leave to file observations on issues (f), (g) and (i) identified in the Order.⁵

7. On 17 November 2025, the Registry transmitted a second request from Mr Bengo-Gate, President of the *Association des réintégrés en Centrafrique - Arc en Ciel* for leave to file observations on several issues identified in the Order.⁶

8. On 18 November 2025, the Chamber directed the Parties to respond to the Requests by 24 November 2025.⁷ The deadline was subsequently postponed to

³ See the Order for Submission on Reparations (Trial Chamber V), [No. ICC-01/14-01-18-2821](#), 8 October 2025 (the “Order”).

⁴ *Idem*, para. 6 (iv).

⁵ See the Queen’s University Request, *supra* note 1.

⁶ See the *Arc en Ciel* Request, *supra* note 2.

⁷ See the email from the Chamber on 18 November 2025 at 17:49.

3 December 2025⁸ following a request by the Defence of Mr Yekatom,⁹ supported by the Defence of Mr Ngaïssona¹⁰ and not opposed by the CLRV.¹¹

IV. SUBMISSIONS

9. In accordance with rule 103 of the Rules, a Chamber may invite *amicus curiae* submissions on any issue deemed appropriate, if it considers it desirable for the proper determination of the case. Said determination is made on a case by case basis and aims at having the opportunity to get experts' information on relevant issues of legal interest for the proceedings.¹²

10. The CLRV welcome the expression of interest of organisations knowledgeable in the field of reparations and, therefore, they consider that the participation in the proceedings of the Queen's University is appropriate and useful. Indeed, its Human Rights Centre possesses expertise in reparations matters and it has already participated in several reparations proceedings before the Court.¹³

11. The CLRV note that the Queen's University proposes to submit observations on issues (g), (i) and (f) identified in the Order. In this regard, they submit that observations to be provided by the applicant, if authorised, must derive from information already in its possession, rather than from consultations with the affected communities. The CLRV themselves will submit extensive submissions in this respect based on consultations with their clients. It is therefore neither necessary nor appropriate for the Queen's University to seek first-hand information from victims

⁸ See the email from the Chamber on 19 November 2025 at 14:41.

⁹ See the email from the Defence of Mr Yekatom on 19 November 2025 at 00:56.

¹⁰ See the email from the Defence of Mr Ngaïssona on 19 November 2025 at 10:07.

¹¹ See the email from the CLRV on 19 November 2025 at 10:38.

¹² See *inter alia*, the "Decision on "Motion for Leave to File Proposed Amicus Curiae Submission of the International Criminal Bar Pursuant to Rule 103 of the Rules of Procedure and Evidence" (Appeals Chamber), [No. ICC-01/04-01/06-1289](#), 22 April 2008, para. 8.

¹³ See the Queen's University Request, *supra* note 1, para. 3.

and/or affected community and could, on the contrary, create confusion and misunderstanding within said affected communities. Moreover, the Registry and the Trust Fund for Victims (the “TFV”) will also provide information collected from the affected communities.¹⁴

12. Concerning the *Arc en Ciel* Request, the CLRV oppose it for the reasons detailed *infra*.

13. The organisation does not demonstrate any specific expertise on the matter identified by the Chamber in the Order. In this regard, the organisation merely indicates having a “link” to the proceedings because it claims to represent 23 victims admitted to participate in the present case, as well as 15 victims who were not admitted and 17 victims whose file is with the Registry.¹⁵ This simply establishes that the organisation appears to maintain some form of contact with individuals associated with this case and with other proceedings before the Court. It does not demonstrate any particular knowledge or expertise of matters related to the reparations proceedings as identified by the Chamber in its Order, nor relevant information about the victims population.

14. Incidentally, as far as the participating victims are concerned, the CLRV note that their interests are represented by Counsel appointed who have maintained contact with them since the start of the trial. Mr Bengo-Gate’s statement according to which the organisation ‘represents’ 23 individuals admitted to participate in the case is therefore incorrect.

15. Furthermore, [REDACTED].

16. [REDACTED].

¹⁴ See the Order, *supra* note 3, para. 6(v).

¹⁵ See the *Arc en Ciel* Request, *supra* note 2, Annex 1, page 2 and Annexes 2-4.

17. [REDACTED].¹⁶ [REDACTED].

18. The CLRV submit that the information referred *supra* [REDACTED] justifying a cautious approach of not authorising the filing of observations.

19. In any case, the CLRV are able to provide information of comparable nature in their submission to be filed by 27 March 2026.

20. Lastly, [REDACTED],¹⁷ the CLRV suggest that the annexes to the Request remain confidential in order to avoid creating expectations amongst victims at a time in which no determination on reparations has been made by the Chamber.

¹⁶ REDACTED.

¹⁷ REDACTED.

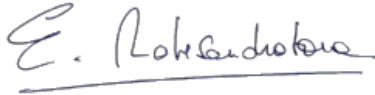
V. CONCLUSION

For the foregoing reasons, the CLRV respectfully request the Chamber to:

- (i) authorise the Queen's University Belfast Human Rights Centre to submit observations, clarifying that information shall be based on data and knowledge in its possession without consultation with victims and/or affected communities; and
- (ii) reject the *Association des réintégrés en Centrafrique - Arc en Ciel* Request.



Paolina Massidda



Elisabeth Rebesandratana



Yaré Fall



Abdou Dangabo Moussa



Marie Edith Douzima-Lawson

Common Legal Representatives Victims of Other Crimes

Dated this 3rd day of December 2025

At The Hague (The Netherlands), Bangui (Central African Republic), La Rochelle (France) and Dakar (Senegal)