

**Cour
Pénale
Internationale**



**International
Criminal
Court**

Original: English

No.: ICC-02/05-01/20
Date: 29 January 2026

TRIAL CHAMBER I

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

SITUATION IN DARFUR, SUDAN

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

Public

**Redacted version of Request for leave to submit amicus curiae observations on
reparation pursuant to article 75 of the Statute and Rule 103 of the Rules of
Procedure and Evidence dated 26 January 2026
No. ICC-02/05-01/20-1301**

Source:

REDRESS

Rights for Peace

Darfur Women Action Group Uganda (DWAG Uganda)

Darfur Network for Human Rights (DNHR)

Queen's University Belfast Human Rights Centre

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

☒ Trust Fund For Victims

Registrar

M. Zavala Giler, Osvaldo

☐ Counsel Support Section

☐ Victims and Witnesses Unit

☐ Detention Section

☒ Victims Participation and
Reparations Section

☐ Other

I. Introduction

1. Rights for peace (RfP), REDRESS, Darfur Women Action Group Uganda (DWAG Uganda), Darfur Network for Human Rights (DNHR) and Queen's University Belfast Human Rights Centre, (HRC), (collectively "the Applicants") respectfully request Trial Chamber I for leave to submit amici curiae observations pursuant to Rule 103(1) of the Rules of Procedure and Evidence ("the Rules"), and regulations 24*bis*, 34 and 38(2) of the Regulations of the Court (the "Regulations"), regarding the issues set forth in paragraph 6 of Trial Chamber I's "Order for Submissions on Reparations"¹ in the situation in Darfur, Sudan in the case of *The Prosecutor v. Ali Muhammad Ali Abd-Al-Rahman*.

II. Procedural History

2. On 6 October 2025, the Trial Chamber I of the International Criminal Court (the Chamber) convicted Mr Ali Muhammad Ali Abd-Al-Rahman ("Ali Kushayb") for the commission of 27 counts of crimes against humanity and war crimes.²
3. On 9 December 2025 the Chamber sentenced Mr Ali Kushayb to a joint sentence of 20 years of imprisonment.³
4. On 9 December 2025 the Chamber issued its "Order for Submissions on Reparations"⁴ providing for any persons or organizations with local expertise, to request leave to make submissions pursuant to article 75 of the Statute and rule 103 of the of the Rules.

III. Background and Expertise

5. REDRESS is an international non-governmental organisation that has special consultative status with the United Nations Economic and Social Council. Its mandate is to seek justice and reparation for victims of torture and related international crimes. It has over 25 years'

¹Prosecutor v Abd-Al-Rahman (Ali Kushayb), *Order for Submissions on Reparations* (ICC Trial Chamber I, Case No ICC-02/05-01/20-1282, 9 December 2025).

²Prosecutor v Abd-Al-Rahman (Ali Kushayb), *Trial Judgment* (ICC Trial Chamber I, Case No ICC-02/05-01/20-1240, 6 October 2025).

³Prosecutor v Abd-Al-Rahman (Ali Kushayb), *Sentencing Judgment* (ICC Trial Chamber I, Case No ICC-02/05-01/20-1281, 9 December 2025).

⁴Abd-Al-Rahman Reparations Order (n 1).

expertise in advocating for the rights of victims to gain both access to the courts and redress for their suffering, in over 50 countries worldwide. REDRESS has extensive experience in directly representing victims before national, regional, and international courts and tribunals, as well as UN treaty bodies and special procedures. REDRESS has regularly been granted leave to intervene in cases before the Court, the African Commission on Human and Peoples' Rights, the European Court of Human Rights, the Special Court for Sierra Leone, and the Extraordinary Chambers in the Courts of Cambodia. REDRESS has over 20 years experience working on international justice in Sudan with Sudanese victims, survivors, and activists.

6. Rights for Peace (RfP) is a human rights organisation working to prevent mass atrocity crimes in fragile states, by supporting and collaborating with local organisations. Its mission is to strengthen victims' rights and resilience for prevention, through training, front line action and advocacy with a particular focus on identity-based violence. Over the past six years, the organisation has focused its activities primarily in Sudan and South Sudan working with survivors of conflict-related sexual violence, affected communities, human rights defenders and civil society partners. A key study of relevance is the *Sudan Study on the Status of and Opportunities for Reparations for Survivors of Conflict-Related Sexual Violence*⁵, and the *Sudan Country Briefing on Reparations for Survivors of Conflict Related Sexual Violence*.⁶
7. Through its community engagement, capacity-strengthening, and evidence-based analysis, the organisation has developed specialised expertise in accountability, reparations, and the prevention of mass-atrocity crimes in Sudan context.
8. Darfur Women Action Group Uganda (DWAG Uganda) is a women-led, anti-atrocity non-profit organisation, founded in 2009 by a Darfuri genocide survivor, with 501©(3) status, that amplifies the voices and empowers survivors of the Darfur genocide in Sudan and in the diaspora. Its vision is a world of justice, equal rights, and respect for human

⁵ Rights for Peace at al., *Sudan Study on the Status of and Opportunities for Reparation for Survivors of Conflict Related Sexual Violence* (August 2023) <<https://www.rightsforpeace.org/reparations-sudan>> accessed 19 December 2025.

⁶ Rights for Peace at al., *Sudan Country Briefing, Reparations for Survivors of Conflict Related Sexual Violence* (August 2023) <<https://www.rightsforpeace.org/reparations-sudan>> accessed 19 December 2025.

dignity. Moreover, its mission focuses on equipping survivors and affected communities with tools to confront and resist violence, demand accountability, and prevent future atrocities while promoting sustainable peace. DWAG Uganda works through multiple complementary strategies: advocating for civilian protection and accountability, maintaining international attention on Darfur, providing education to children in displacement camps, and operating Women Empowerment Centers that deliver skills training, trauma counselling, and psychosocial support to women survivors of sexual violence. It also promotes grassroots leadership by women, builds capacity of civil society organisations, and supports human rights defenders in documenting abuses. Through public events, including annual symposiums on women and genocide, advocacy campaigns, and mobilising voices in the international community, DWAG Uganda educates global audiences, empowers activists, and sustains pressure for justice and prevention of mass atrocities.

9. Queen's University Belfast Human Rights Centre (HRC) is a group of professors, practitioners and scholars working on transitional justice, international criminal law, and international human rights law. The HRC and its members have provided research and evidence to a range of national, regional and international courts as well as governments around the world on operationalising reparations and victim's right, including in cases of *Katanga*, *Bemba*, *Al-Mahdi*, *Ntaganda* and *Al Hassan* before the ICC.
10. Darfur Network for Human Rights (DNHR) is a national human rights organization dedicated to the promotion and protection of human rights in the Darfur region. DNHR works through systematic monitoring, documenting reporting of human rights violations, collecting testimonies from victims and witnesses. The organization has shared this evidence with regional and international mechanisms, including REDRESS, the International Criminal Court (ICC), and the UN Fact-Finding Mission on Sudan (FFM Sudan). DNHR maintains thousands of documented cases, which constitute a critical body of evidence that can support accountability processes and reparations claims, including in cases such as that of Ali Muhammad Ali Abd-Al-Rahman ("Ali Kushayb").
11. The Applicants are requesting leave to submit a joint amicus curiae brief, based on the belief that the complementarity of their international and national expertise could be of

assistance to the Court in this case. The expertise of the Applicants has been widely recognised because of their deep knowledge of the right to reparations in theory and in practice, their knowledge of international systems such as the International Criminal Court and their expertise and first-hand work in Sudan, with survivors and victims of international crimes and victims of the case. Their joint efforts on this amicus would permit them to integrate a wealth of knowledge and experience that are relevant to the Court when deciding on reparations for the victims. In particular, if granted, this amicus will bring a firm and clear understanding of the context and views of victims in Sudan. In this regard, the Applicants will conduct a number of consultations and discussions to collect relevant information that can assist the Chamber in its deliberations.

IV. Applicable law

12. Article 75 of the Rome Statute and Rule 103(1) of the Rules provide a Chamber with the authority to accept requests to present amicus curiae observations on any issue the Chamber deems appropriate by organisations, or individuals interested in addressing issues of relevance to the proceedings.

V. Specific issues to be addressed

13. The Applicants respectfully seek to submit observations on the following issues from the list contained in paragraph 6 of the Chamber's Order for Submissions on Reparations, primarily in relation to:
 - (ii) any factual or legal issues relevant to the identification of eligible victims;
 - (iii) considerations relevant to the prioritisation of victims and groups of victims in the reparations process;
 - (iv) the specification of the types and extent of the harm suffered by the victims identified in the Mapping Report;
 - (v) whether recourse to factual presumptions should be considered;
 - (vi) the types and modalities of reparations appropriate to address the harm suffered by victims of the crimes of which Mr Abd-Al-Rahman was convicted.
 - (x) additional information relevant to reparations.

14. This focus reflects the Applicants' direct engagement with affected communities, including through workshops and Focus Group Discussions, which enables them to convey victims' views, experiences, and recommendations to the Court. At the same time, and where relevant, the Applicants will also provide observations on the remaining issues identified by the Chamber, situating their analysis within the broader reparations framework before the Court.

VI. Relief Requested

15. The Applicants request that the Chamber grants them leave to submit amicus curiae observations on the issues listed in paragraph 14 of this request based on the belief that the complementarity of their international and national expertise could be of assistance to the Court in this case. The expertise of the Applicants has been widely recognised because of their deep knowledge of the right to reparations in theory and in practice, their knowledge of international systems such as the International Criminal Court and their expertise and first hand work in Sudan, with survivors of international crimes and victims of the case. Their joint efforts on this amicus would permit to integrate a wealth of knowledge and experience that are relevant to the Court when deciding on reparations. In particular, if granted, this amicus will bring a firm and clear understanding of the context and views of victims in Sudan. In this regard, the Applicants will conduct a number of focus group discussions and consultations to collect relevant information that can assist the Chamber in its deliberations.



Mariana Goetz on behalf of Rights for Peace



Prof Luke Moffett on behalf of QUB Human Rights Centre



Mohammed Hassan on behalf of Darfur Network for Human Rights

[REDACTED]

[REDACTED] on behalf Darfur Women Action Group Uganda

A handwritten signature in dark ink, appearing to read 'Rupert Skilbeck', with a long horizontal flourish extending to the right.

Rupert Skilbeck on behalf of REDRESS

Dated this 29 January 2026

At The Hague, The Netherlands