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Date: 21 June 2011

TRIAL CHAMBER III

Before: Judge Sylvia Steiner, Presiding Judge
Judge Joyce Aluoch
Judge Kuniko Ozaki

SITUATION IN THE CENTRAL AFRICAN REPUBLIC

**IN THE CASE OF
THE PROSECUTOR
v. Jean-Pierre Bemba Gombo**

Public redacted Version

**Defence Response to the Prosecution's List of documents to be submitted into
evidence pursuant to Trial Chamber III's order of 31 May 2011**

Source: Defence for Mr. Jean-Pierre Bemba Gombo

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

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A. BACKGROUND

1. On 3 May 2011, the Appeals Chamber rendered its *Judgment on the appeals of Mr Jean-Pierre Bemba Gombo and the Prosecutor against the decision of Trial Chamber III entitled Decision on the admission into evidence of materials contained in the prosecution's list of evidence*,¹ in which it reversed the majority of Trial Chamber III's *Decision on the admission into evidence of materials contained in the prosecution's list of evidence* of 19 November 2010.²

2. On 31 May 2011, Trial Chamber III ('Chamber') rendered its *Order on the procedure relating to the submission of evidence* ('Order'),³ in which it set out the 'procedure for the admission of material included in the parties' lists of documents intended to be used during the questioning of witnesses and used in court to date, and other material used in court to date from the commencement of the trial until and including the testimony of Witness 209.'⁴

3. In accordance with the Order, on 14 June 2011 the Prosecution filed its list of material to be admitted in respect of the witnesses already heard ('Prosecution List of documents').⁵

4. Pursuant to paragraph 4 the Order,⁶ the Defence hereby raises objections to the admissibility of the following documents contained on the Prosecution List of documents.

B. RELEVANT LAW

¹ ICC-01/05-01/08-1386

² ICC-01/05-01/08-1022.

³ ICC-01/05-01/08-1470

⁴ ICC-01/05-01/08-1470, paras 3 – 6.

⁵ ICC-01/05-01/08-1514 ('Prosecution List of Documents')

⁶ ICC-01/05-01/08-1470.

5. As a starting point, the Defence notes that during the Preparatory Committee it was considered that “relevancy” should not be the sole determinant of admissibility and other factors need to be considered, including a fair trial, the rights of the defence and a fair evolution of the testimony of a witness.⁷ The jurisprudence of the Court also provides that a Trial Chamber consider three principal factors when determining admissibility of evidence other than direct oral testimony:

- a) *prima facie* relevance of documents;
- b) their *prima facie* probative value; and
- c) the balance between *prima facie* probative value of the evidence and any prejudicial effect.⁸

6. Fundamental to the regime established by the Statute and Rules of the Court is the principle of the primacy of orality, which encapsulates the general rule that witness evidence “shall be given in person” as required by Article 69(2) of the Statute. In reversing the Chamber’s Decision to admit wholesale all documents contained on the Prosecution’s Revised List of Evidence, the Appeals Chamber recently affirmed the importance of this principle, holding that that “[t]he importance of in-court personal testimony is that the witness giving evidence under oath does so under the observation and general oversight of the Chamber. The Chamber hears the evidence directly from the witness and is able to observe his or her demeanour and composure, and is also able to seek clarification on aspects of the witness’ testimony that may be unclear so that it may be accurately recorded.”⁹

⁷ Donald K. Piragoff in: Triffterer, O, Commentary on the Rome Statute of the International Criminal Court – Observers’ Notes, Article by Article, (Nomos Verlag, 2nd ed., 2008), p. 1305.

⁸ *Prosecutor v. Thomas Lubanga Dyilo*, Decision on the Admission from the “bar table”, Case No. ICC-01/04-01/06, 24 June 2009, para. 4.; see also in: *Prosecutor v. Katanga and Ngudjolo*, Prosecution’s Submission of Material as Evidence from the Bar Table Pursuant to Article 64 (9) of the Statute, Case No.: ICC-01/04-01/07, 16 July 2010, para. 14; See also: *Prosecutor v. Lubanga*, Decision on the admissibility of four documents, Case No.: ICC-01/04-01/06, 13 June 2008, paras: 27-31.

⁹ ICC-01/05-01/08-1386, para 76.

7. The Prosecution in these proceedings has also previously emphasised that the Statute requires as a “central aspect of the fairness of the proceedings and the rights of the accused” that as a general rule witness evidence “shall be given in person.” More specifically, the Prosecution submitted that prior witness statements “could only be included as evidence *per se* by means of exception and under very specific conditions.”¹⁰ And while it is clear that Rule 68(b) of the Rules of Procedure and Evidence does provide for an exception to the general principle, the Defence also notes the recent decision in the *Katanga & Ngudjolo* case, where Trial Chamber II was guided by the recent Appeals Chamber Judgement in the present proceedings, and held that “compliance with the requirements of rule 68(b) of the Rules does not automatically create a sufficient ground to deviate from the orality principle.”¹¹

8. Also essential to the proceedings before the Court is the requirement that an accused has a right to a public trial, pursuant to Article 67(1).¹² Article 64(7) also sets out the general principle that “[t]he trial shall be held in public.” The European Court of Human Rights has been unequivocal that the public nature of trials:¹³

“protects litigants against the administration of justice in secret with no public scrutiny; it is also one of the means whereby confidence in the courts can be maintained. By rendering the administration of justice transparent, publicity contributes to the achievement of the aim of article 6(1), namely a fair trial.”

9. With these overall principles in mind, the Defence is obliged to raise the following objections to materials contained in the Prosecution List of documents in the terms set out below.

C. SUBMISSIONS

¹⁰ ICC-01/05-01/08-1194, paras 37, 38.

¹¹ ICC-01/04-01/07-2954 25-05-2011, paras 4, 7.

¹² This right is reflected in the Statutes of other international courts and tribunals, namely Article 21(2) of the ICTR Statute; Article 20(2) of the ICTY Statute; Article 16(2) of the Statute of the Special Tribunal for Lebanon; Article 34 ECCC Law; and Article 17(2) of the Statute of the Special Court for Sierra Leone.

¹³ Judgement, *Werner v. Austria*, 24 November 1997, § 45.

(a) Witness 22

10. The Defence objects to the admission of CAR-OTP-0004-0316 (Medical Certificate) and CAR-OTP-0007-0569 (Medical Reports). These documents are not relevant to an issue in the case. They neither prove, nor disprove that the witness in question was the subject of rape or sexual violence, and do not identify physical injuries consistent with rape. In so far as the medical reports can be seen as positive proof of infection with the HIV virus as opposed to proof of a suppressed immune system (which is not the same thing), they do not indicate infection resulting from any sexual assault alleged. Moreover, the contraction of HIV is not an element of the crimes charged in the Revised Second Amended Document Containing the Charges.¹⁴ For all the aforementioned reasons, the introduction of the medical reports would have a prejudicial effect far outweighing any probative value.

(b) Witness 0068

11. The Defence objects to the admission of CAR-OTP-0020-0442 (Certificate). The Defence notes that the document was prepared in October 2004, nearly two years after the alleged attack on the witness. As such, it is neither a contemporaneous nor corroborative account of the alleged November 2002 attack. The lack of an address or telephone number undermines the document's probative value and reliability. The fact that it refers to an alleged visit in November 2002 further undermines its reliability, as it cannot be explained why no such letter was produced at the first meeting, or why records of the first meeting are neither attached nor referred to.

¹⁴ ICC-01/05-01/08-856-Conf-AnxA

(c) Witness 23

12. The Defence objects to the admission of CAR-OTP-0008-0033_R04 (Witness Statement), CAR-OTP-0008-0050_R03 (Witness Statement); CAR-OTP-0008-0088_R03 (Witness Statement); CAR-OTP-0008-0112_R03 (Witness Statement); CAR-OTP-0034-0106_R02 (Translation of Witness Statement); CAR-OTP-0034-0123_R02 (Translation of Witness Statement); CAR-OTP-0034-0154_R02 (Translation of Witness Statement); CAR-OTP-0034-0170_R02 (Translation of Witness Statement).

13. The Prosecution seeks to tender these statements as “prior consistent statements” that are “consistent with the witness’s testimony” and are offered “to rebut an express or implied charge against the witness of recent fabrication, motive or collusion.”¹⁵

14. As a starting point, the Defence notes that “compliance with the requirements of rule 68(b) of the Rules does not automatically create a sufficient ground to deviate from the orality principle.”¹⁶ As to the Prosecution’s first argument, that the statements are consistent with the witness’s testimony, the Defence notes that this does not provide sufficient basis for their admission. In a decision of 25 May 2011 in the *Katanga & Ngudjolo* case, Trial Chamber II referred to the recent Appeals Chamber Judgement in the present proceedings, and held:¹⁷

The Chamber's starting point in analysing the Request is the principle of orality. This principle is enshrined in article 69(2) of the Statute and was recently confirmed by the Appeals Chamber to be one of the key principles of trials before the ICC.... The simple assertion that a written statement of a witness who has appeared for testimony provides the broader context in which a specific statement was made, **or allegedly corroborates the oral testimony given at trial, does not qualify as a sufficient reason for admitting it into evidence.** Consequently, the Chamber sees no reason in the present case to deviate from its established practice to not allow prior recorded statements of witnesses who appear before it into evidence.

¹⁵ ICC-01/05-01/08-1514-Conf-AnxA, pages 6, 7.

¹⁶ ICC-01/04-01/07-2954 25-05-2011, paras 4, 7.

¹⁷ ICC-01/04-01/07-2954 25-05-2011, paras 4, 7 (emphasis added and internal footnotes omitted).

15. As to the Prosecution's second argument, namely that the statements are offered to to "rebut an express or implied charge against the witness of recent fabrication, motive or collusion", the Defence notes that a prior statement does not become admissible simply because an allegation of fabrication, motive of collusion is raised. If there were matters contained within the statement which merited clarification following Defence question of Witness 0023, both the Rules of Procedure and Evidence, and the practice of the Chamber provide the Prosecution with an opportunity to do so in re-examination. It is impermissible to seek to correct any failing on this score by asking to admit the witness' prior statement into evidence. As such, the Prosecution justification for admission is without merit.

16. In addition, the admission of these prior statements is not permissible under the statutory regime of the Court. The Prosecution has not provided a legal basis within the Rules or the Statute for the admission of these prior statements into evidence.¹⁸ As noted above, the Appeals Chamber has recently, and in reference to the present proceedings, again reiterated the importance of the principle of the primacy of orality, which it recognised as the general rule. While recognising the existence of exceptions to this general rule, the Appeals Chamber held that:

"[i]n deviating from the general requirement of in-court personal testimony and receiving into evidence any prior recorded witness testimony a Chamber must ensure that doing so is not prejudicial to or inconsistent with the rights of the accused or with the fairness of the trial generally. In the view of the Appeals Chamber, this requires a cautious assessment. The Trial Chamber may, for example, take into account, a number of factors, including the following: (i) **whether the evidence relates to issues that are not materially in dispute; (ii) whether that evidence is not central to core issues in the case, but only provides relevant background information;** and (iii) whether the evidence is corroborative of other evidence."¹⁹

17. Consistent with this appellate jurisprudence, the practice of both Trial Chamber I and Trial Chamber II demonstrate that prior statements are inadmissible when the evidence contained therein relates to matters that are significant to the case, or materially in dispute, as is the case in the statements of Witness 0023.

¹⁸ ICC-01/05-01/08-1514-Conf-AnxA, pages 6, 7.

¹⁹ ICC-01/05-01/08-1386, para 76 (emphasis added, internal footnotes omitted).

18. In the *Lubanga* case, Trial Chamber I examined the ambit of Rule 68, and held that “the right of the accused to a fair trial must not be undermined by decisions of this kind, and the Chamber must ensure that the accused's rights are appropriately protected.”²⁰ In terms of the latter, the Chamber indicated that the rights of the Defence would not be infringed if the witness is available in court for examination by the accused, and the evidence only concerns background detail, or information which is corroborative of other evidence, and there was nothing to indicate that the evidence was materially in dispute.²¹

19. Similarly, in the *Katanga & Ngudjolo* case, Trial Chamber II refused to admit parts of a prior statement which related directly to an attack. The Chamber held that the statement concerned “matters which may be of considerable significance to the case. If the Prosecution wishes to rely on this testimony, it must orally examine P-166 on these points.”²²

20. The Prosecution has submitted that the statements of Witness 23 sought to be tendered “are relevant and probative, inter alia, to prove rape and pillaging.”²³ As such, they certainly pertain to matters which are materially in dispute, and are matters which are of “considerable significance” to the case. The Prosecution had the opportunity to examine, and re-examine Witness 0023 on these points, and has provided no valid justification as to why the Chamber should deviate from the general rule as set out in Article 69(2) of the Statute.

²⁰ Decision on the prosecution’s application for the admission of the prior recorded statements of two witnesses, ICC-01/04-01/06-1603, 15 January 2009, para 23.

²¹ ICC-01/04-01/06-1603, para 24.

²² *Decision on Prosecutor’s request to allow the introduction into evidence of the prior recorded testimony of P-166 and P-219*; 3 September 2010; ICC-01/04-01/07-2362, para. 28

²³ ICC-01/05-01/08-1514-Conf-AnxA, pages 6, 7.

(d) Witness 0042

21. The Defence objects to the admission of CAR-OTP-0027-0786 (Witness Statement); CAR-OTP-0027-0809 (Witness Statement); CAR-OTP-0027-0845 (Witness Statement); CAR-OTP-0049-1300; (Translation of Witness Statement) CAR-OTP-0049-1323 (Translation of Witness Statement); CAR-OTP-0049-1361 (Translation of Witness Statement).

22. The Defence repeats and relies on the arguments made in relation to the statements of Witness 0023 above.

(e) Witness 0073

23. The Defence objects to the admission of CAR-OTP-0039-0315_R01 (Witness Statement); CAR-OTP-0039-0341_R01 (Witness Statement); CAR-OTP-0039-0368_R01 (Witness Statement) CAR-OTP-0051-0003_R01 (Translation of Witness Statement); CAR-OTP-0051-0031_R01 (Translation of Witness Statement); CAR-OTP-0051-0059_R01 (Translation of Witness Statement).

24. The Defence repeats and relies on the arguments made in relation to the statements of Witness 0023 above.

(f) Witness 0079

25. The Defence does not object to the tendering of the modified first page of CAR-OTP-0039-0135_R01, but does object to the tendering of the statement as a whole on the grounds enumerated above as regards the tendering of prior statements. However, the Defence does not accept the Prosecution submissions as to the relevance of this modified document to the Witness 0079's complaint before the judicial authorities, on which submissions will be made at the appropriate time.

(g) Witness 0009

26. The Defence objects to the admission of each of the “procès-verbal d’audition de victim” listed at pages 17 to 34 of the Prosecution List of documents, namely all of those which the Prosecution seeks to admit through Witness 0009.

27. The Prosecution has sought the admission of over 200 procès-verbaux of alleged victims not heard by the Chamber in the present proceedings on the following basis: “[t]his document is relevant to prove *inter alia* that crimes committed by the MLC were widespread. The document is probative to issues at trial, and bears sufficient indicia of reliability to warrant its admission into evidence as it was authored by the witness and was part of the dossier that was tendered during the trial. The witness identified some documents in the *dossier* as having been authored by him prior to submission of the *dossier* into evidence.”²⁴ In order to support their admission, the Prosecution cites only to the following transcript reference:²⁵ [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

28. The wholesale admission of these documents into the evidence of this case in this manner is impermissible. As illustrated by the citation directly above, the Prosecution made no attempt to take the witness through the procès-verbaux one by one, in order to demonstrate the witness’ link to each of the documents or his authorship thereof. The three concluding questions posed by the Prosecution, with

²⁴ ICC-01/05-01/08-1514-Conf-AnxA, pages 17, 18.

²⁵ ICC-01/05-01/08-T-104-CONF-ENG ET, pp 31-32.

no individual discussion of the relevance or probative value of each of the documents, cannot justify their admission *en masse*. On this point, the Defence recalls a decision of Trial Chamber II in the *Katanga & Ngudjolo* case, in which the Trial Chamber held:²⁶

First, the Chamber stresses that, although it is permissible to tender documentary evidence directly without producing it by or through a witness under the Statute and the Rules, this does not entail a lower standard of relevance or admissibility. On the contrary, the fact that evidence is being tendered without authentication by a witness may be an important factor in the Chamber's assessment of its admissibility. Second, each item of evidence must be individually assessed for its relevance and probative value at the time it is tendered and before being admitted into evidence. If at the time of tendering an item of evidence, the party is unable to demonstrate its relevance and probative value, including its authenticity, it cannot be admitted.

29. Moreover, it is impossible for the Prosecution to offer all the procès-verbaux as being probative and reliable to warrant admission,²⁷ given that the witness himself cast doubts on the veracity of some of the documents. During the course of his examination, Witness 0009 confirmed his earlier statements explaining that some of the victims he interviewed during the course of his investigation had claimed to be victims of rape, whereas in truth they had voluntarily entered into relationships with the soldiers in question.

30. Witness 0009 confirmed his earlier statements that “[i]t’s difficult because after the events, after Mr. Patasse’s regime fell, all the women who in one way or another had contact with the Banyamulengue came forward as being victims of rape. I know that at that moment in time there were girls, some girls, some prostitutes who came voluntarily and had partners among those soldiers, and they cannot be distinguished now. Everybody came forward saying that they were victims of rape. I am saying this for your information. **Some of them were not victims of rape**; they voluntarily entered into this relationship with these people because they needed a bit of money... Many people came forward, so I could not distinguish the prostitutes who

²⁶ ICC-01/04-01/07-2635, paras 12, 13.

²⁷ ICC-01/05-01/08-1514-Conf-AnxA, page 18.

disguised themselves as victims from the actual victims.”²⁸ As such, the Prosecution’s claim that each of the procès-verbaux bears sufficient indicia of reliability to warrant its admission into evidence cannot be made, and the only way to test the veracity of these claims is through the oral testimony of witness.

(h) Witness 0063

31. The Defence does not object to the tendering of CAR-OTP-0039-0058, in as far as it is admitted in its complete form, and not just the excerpts which appear under the heading “time hacks of video played during trial.”²⁹ Should the Prosecution be in fact seeking to tender the entire video, the Defence does not raise an objection.

(i) Witness 0209

32. The Defence objects to the admission of CAR-OTP-0057-0066_R02 (Witness Statement); CAR-OTP-0057-0080_R01 (Witness Statement); CAR-OTP-0057-0096_R01 (Witness Statement) CAR-OTP-0057-0107_R01 (Witness Statement); CAR-OTP-0057-0128_R01 (Witness Statement); CAR-OTP-0057-0153_R01 (Witness Statement); CAR-OTP-0058-0013_R02 (Translation of Witness Statement); CAR-OTP-0058-0025_R01 (Translation of Witness Statement); CAR-OTP-0058-0043_R01 (Translation of Witness Statement); CAR-OTP-0058-0056_R01 (Translation of Witness Statement); CAR-OTP-0058-0079_R01 (Translation of Witness Statement); CAR-OTP-0062-0086_R01 (Translation of Witness Statement).

33. The Defence repeats and relies on the arguments made in relation to the statements of Witness 0023 above. In addition, the Defence notes that the

²⁸ ICC-01/05-01/08-T-107-ENG ET WT 10-05-2011, pages 39 – 43.

²⁹ ICC-01/05-01/08-1514-Conf-AnxA, pages 34, 35.

Prosecution provides additional justification in support of its request to tender these statements, namely:³⁰

“The Prosecution streamlined its examination so as to cover core issues, due to the health conditions of the witness during his testimony. Therefore, the testimony given by the witness does not capture entirely the information that the witness provided in his statements.”

34. At no time during the examination of this witness did the Prosecution indicate that it was “streamlining” its examination due to the health concerns of the witness. By contrast, the witness was carefully monitored by the Chamber throughout the course of his testimony, and when he experienced discomfort the proceedings were adjourned until the witness was ready to continue his testimony. As such, no need for “streamlining” of his testimony arose.

35. The Defence also notes that the Prosecution estimated that it would examine the witness for 7 hours.³¹ The Prosecution examined the witness for approximately 7.5 hours.³² As such, any argument that its questioning was “streamlined” becomes difficult to accept.

36. The Defence also submits that allowing the admission of evidence on the ground that “the testimony given by the witness does not capture entirely the information that the witness provided in his statements” would set a troubling precedent. Difficulties in a witness’ testimony or less favourable (or even hostile) answers could be avoided on the basis that the more favourable responses contained in prior statements could simply be admitted instead. Such a procedure subverts a proper testing of the evidence by both the Defence and the Chamber, and cannot be reconciled with the Appeals Chamber’s insistence that the admission of prior

³⁰ ICC-01/05-01/08-1514-Conf-AnxA, pages 38, 39.

³¹ ICC-01/05-01/08-975-Conf, page 4.

³² Transcripts of 26 May 2011, 27 May 2011, 30 May 2011 and 31 May 2011.

statements must not be “prejudicial to or inconsistent with the rights of the accused or with the fairness of the trial generally.”³³

37. Nor can it be reconciled with the principle outlined above which requires proceedings to be held in public. The Defence submits that allowing the Prosecution to introduce inculpatory material through prior written statements is inconsistent with the accused’s right to a public trial. Given the confidentiality of prior statements, the substitution of in-court testimony for the admission written statements also means that the public is prevented from receiving a complete picture of the evidence in the trial, which can undermine public confidence in the process.

38. The obligation rests on the calling party to elicit the evidence sought while the witness is on the stand. The proper remedy for the Prosecution’s concerns is not a deviation from the principle of the primacy of orality and the admission of prior statements, but rather would have been a timely submission to the Chamber regarding the health concerns while the witness was still in The Hague.

D. RELIEF SOUGHT

39. In light of all the aforementioned, the Defence objects to the admission of the following documents contained on the Prosecution List of documents:

- CAR-OTP-0004-0316 (Medical Certificate – Witness 0022);
- CAR-OTP-0007-0569 (Medical Reports – Witness 0022);
- CAR-OTP-0020-0442 (Certificate – Witness 0068);
- CAR-OTP-0008-0033_R04 (Witness Statement – Witness 0023),
- CAR-OTP-0008-0050_R03 (Witness Statement - Witness 0023);
- CAR-OTP-0008-0088_R03 (Witness Statement - Witness 0023);
- CAR-OTP-0008-0112_R03 (Witness Statement - Witness 0023);

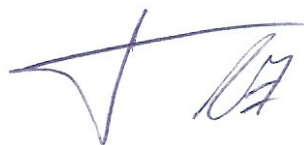
³³ ICC-01/05-01/08-1386, para 76

- CAR-OTP-0034-0106_R02 (Translation of Witness Statement - Witness 0023);
- CAR-OTP-0034-0123_R02 (Translation of Witness Statement - Witness 0023);
- CAR-OTP-0034-0154_R02 (Translation of Witness Statement - Witness 0023);
- CAR-OTP-0034-0170_R02 (Translation of Witness Statement - Witness 0023);
- CAR-OTP-0027-0786 (Witness Statement – Witness 0042);
- CAR-OTP-0027-0809 (Witness Statement – Witness 0042);
- CAR-OTP-0027-0845 (Witness Statement – Witness 0042);
- CAR-OTP-0049-1300; (Translation of Witness Statement – Witness 0042)
- CAR-OTP-0049-1323 (Translation of Witness Statement – Witness 0042);
- CAR-OTP-0049-1361 (Translation of Witness Statement– Witness 0042);
- CAR-OTP-0039-0315_R01 (Witness Statement – Witness 0073);
- CAR-OTP-0039-0341_R01 (Witness Statement Witness 0073);
- CAR-OTP-0039-0368_R01 (Witness Statement Witness 0073);
- CAR-OTP-0051-0003_R01 (Translation of Witness Statement Witness 0073);
- CAR-OTP-0051-0031_R01 (Translation of Witness Statement Witness 0073);
- CAR-OTP-0051- 0059_R01 (Translation of Witness Statement Witness 0073);
- Each of the “procès-verbal d’audition de victim” listed at pages 17 to 34 of the Prosecution List of documents, namely all of those which the Prosecution seeks to admit through Witness 0009.
- CAR-OTP-0057-0066_R02 (Witness Statement – Witness 0209);
- CAR-OTP-0057-0080_R01 (Witness Statement– Witness 0209);
- CAR-OTP-0057-0096_R01 (Witness Statement – Witness 0209);
- CAR-OTP-0057-0107_R01 (Witness Statement - Witness 0209);
- CAR-OTP-0057-0128_R01 (Witness Statement – Witness 0209);
- CAR-OTP-0057-0153_R01 (Witness Statement– Witness 0209);
- CAR-OTP-0058-0013_R02 (Translation of Witness Statement– Witness 0209);
- CAR-OTP-0058-0025_R01 (Translation of Witness Statement – Witness 0209);
- CAR-OTP-0058-0043_R01 (Translation of Witness Statement – Witness 0209);
- CAR-OTP-0058-0056_R01 (Translation of Witness Statement – Witness 0209);
- CAR-OTP-0058-0079_R01 (Translation of Witness Statement– Witness 0209);

- CAR-OTP-0062-0086_R01 (Translation of Witness Statement– Witness 0209).



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21 June 2011