

**Cour
Pénale
Internationale**



**International
Criminal
Court**

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No.: **ICC-01/04-02/06**

Date: **13 February 2014**

PRE-TRIAL CHAMBER II

Before: Judge Ekaterina Trendafilova, Presiding Judge
Judge Hans-Peter Kaul
Judge Cuno Tarfusser

SITUATION IN THE DEMOCRATIC REPUBLIC OF THE CONGO

***IN THE CASE OF
THE PROSECUTOR v BOSCO NTAGANDA***

Public

**Application by the Redress Trust for leave to submit observations pursuant to Rule 103
of the Rules of Procedure and Evidence**

Source: The Redress Trust

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

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Defence Support Section

Victims and Witnesses Unit

Detention Section

**Victims Participation and Reparations
Section**

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I. Introduction

1. The Redress Trust (**REDRESS**) seeks leave of Pre-Trial Chamber II (**the Chamber**) to submit, as amicus curiae pursuant to Rule 103 of the Rules of Procedure and Evidence, written observations concerning the developments in international law which demonstrate the ways in which facts justifying charges of rape and sexual violence may, in particular circumstances, also properly support charges of torture, and when these crimes may be charged, individually, cumulatively or alternatively.
2. Bosco Ntaganda is charged with 13 counts of war crimes and five counts of crimes against humanity including, the war crimes of rape and sexual slavery of civilians and the crimes against humanity of rape and sexual slavery of civilians.
3. The proposed observations would be designed to assist the Chamber to determine whether the evidence appears to establish a different crime within the jurisdiction of the Court than those charged, in view of the powers of the Chamber pursuant to Article 61(7)(c)(ii) of the Rome Statute (**the Statute**).

II. Procedural Background

4. On 22 August 2006, Pre-Trial Chamber I, to which this case had originally been assigned, issued a warrant of arrest for Bosco Ntaganda¹ for his alleged responsibility for the war crimes of conscripting and enlisting children under the age of fifteen and using them to participate actively in hostilities under either Article 8(2)(b)(xxvi) or Article 8(2)(e)(vii) of the Statute.
5. On 15 March 2012, the Presidency re-assigned the situation in the Democratic Republic of the Congo to this Chamber² which, on 13 July 2012, issued a second warrant of arrest against Bosco Ntaganda for his alleged responsibility for the crimes against humanity of murder, rape, sexual slavery, and persecution based on ethnic grounds, under Articles 7(1)(a), 7(1)(g) and 7(1)(h) of the Statute, and the war crimes

¹ *Prosecutor v Bosco Ntaganda* (Warrant of Arrest), ICC-01/04-02/06-2-Anx-tENG, 22 August 2006.

² *Situation in the Democratic Republic of the Congo* (Decision on the constitution of Pre-Trial Chambers and on the assignment of the Democratic Republic of the Congo, Darfur, Sudan and Côte d'Ivoire situations), ICC-Pres-01-12, Presidency, 15 March 2012.

of murder, attacks against the civilian population, pillaging, rape and sexual slavery under Articles 8(2)(c)(i), 8(2)(e)(i), 8(2)(e)(v) and 8(2)(e)(vi) of the Statute.³

6. On 22 March 2013, the Single Judge,⁴ acting on behalf of Pre-Trial Chamber II, issued the “Decision on Setting the Date for the Initial Appearance and Related Issues”, in which she, *inter alia*, decided that the confirmation of charges hearing would commence on 23 September 2013.⁵
7. On 17 June 2013, the Single Judge issued the “Decision on the ‘Prosecution’s Urgent Request to Postpone the Date of the Confirmation Hearing’ and Setting a New Calendar for the Disclosure of Evidence Between the Parties”,⁶ which ordered that the commencement of the confirmation of charges hearing be postponed until Monday, 10 February 2014.
8. On 10 January 2014, the Prosecutor filed the “Prosecution’s Submission of Document Containing the Charges and the List of Evidence” together with four annexes appended thereto.⁷ This Document Containing the Charges (the **DCC**) did not include charges of torture in counts 4, 5, 7 and 8; the relevant charges are set out as rape and sexual slavery of civilians.

III. The Applicant

9. REDRESS is an international nongovernmental organisation with a mandate to encourage accountability for those who perpetrate torture and related international crimes and to seek justice and reparation for victims of such crimes. It has considerable expertise in representing individual survivors at the national and international levels and in providing legal assistance to representatives of survivors, including in cases where rape and sexual violence has amounted to torture.

³ *Prosecutor v Bosco Ntaganda* (Decision on the Prosecutor’s Application under Article 58), ICC-01/04-02/06-36-Red, PTC II, 13 July 2012.

⁴ Judge Ekaterina Trendafilova, Presiding Judge.

⁵ *Prosecutor v Bosco Ntaganda* (Transcript of Initial Appearance), ICC-01/04-02/06-T-2-ENG, 26 March 2013, p 12.

⁶ *Prosecutor v Bosco Ntaganda* (Decision on the “Prosecution’s Urgent Request to Postpone the Date of the Confirmation Hearing” and Setting a New Calendar for the Disclosure of Evidence Between the Parties), ICC-01/04-02/06-73, PTC II, 17 June 2013.

⁷ Annexes A and C are public. Annex B was confidential but by order of Pre-Trial Chamber II on 14 January 2014 (ICC-01/04-02/06-209) it was reclassified as public. Annex D is confidential.

10. It has extensive experience in interventions before national and international courts and tribunals including, at the international level, the United Nations Committee against Torture, the United Nations Human Rights Committee, the European Court of Human Rights, the Inter-American Commission on Human Rights, the Special Court for Sierra Leone, and the Extraordinary Chambers in the Courts of Cambodia. It has also intervened in proceedings before the International Criminal Court.⁸
11. REDRESS has conducted extensive research and published papers and reports on the legal characterisation of rape and sexual violence as a form of torture as reflected in international jurisprudence and as a basis for domestic legislative reform and strategic litigation practices.⁹

III. Nature and Scope of the Proposed Observations

12. The proposed observations will describe and analyse jurisprudence from diverse jurisdictions, including particularly the *ad hoc* international criminal tribunals and international human rights bodies, demonstrating the ways in which facts justifying charges of rape and sexual violence may, in particular circumstances, also properly support charges of torture, and the circumstances in which these crimes may be charged, individually, cumulatively and alternatively.
13. As regards cumulative charging, the proposed observations would:
 - (a) provide an analysis of the elements of the crimes of torture, rape and sexual slavery as crimes against humanity and as war crimes. So far as REDRESS

⁸ *Prosecutor v Saif Al-Islam Gaddafi and Abdullah Al-Senussi* (Lawyers for Justice in Libya and Redress Trust's Observations pursuant to Rule 103 of the Rules of Procedure and Evidence), ICC-01/11-01/11-172, PTC I, 8 June 2012; *Prosecutor v Laurent Gbagbo* (Redress Trust Observations to Pre-Trial Chamber I of the International Criminal Court Pursuant to Rule 103 of the Rules of Procedure and Evidence) ICC-02/11-01/11-62, PTC I, 16 March 2012; *Prosecutor v Joseph Kony, Vincent Otti, Okot Odhiambo, Dominic Ongwen* (Amicus Curiae submitted pursuant to the Pre-Trial Chamber II "Decision on application for leave to submit observations under Rule 103" dated 5 November 2008), ICC-02/04-01/05-353, PTC II, 18 November 2009.

⁹ REDRESS' publications are available on its website: <http://www.redress.org/reports/reports>. See in particular, REDRESS, 'Redress for Rape. Using international jurisprudence on rape as a form of torture or other ill-treatment' (October 2013) available in English and French at: [http://www.redress.org/downloads/publications/FINAL%20Rape%20as%20Torture%20\(1\).pdf](http://www.redress.org/downloads/publications/FINAL%20Rape%20as%20Torture%20(1).pdf); <http://www.redress.org/downloads/publications/1311FRENCHRape%20as%20torture.pdf>. See also, REDRESS and Amnesty International, 'Gender and Torture Conference Report' (October 2011) available at: <http://www.redress.org/downloads/publications/GenderandTortureConferenceReport-191011.pdf>.

can determine, such observations have not before been presented to the Court.
In this respect:

- (i) as regards war crimes, the observations would consider whether there are materially distinct elements for rape as a war crime under Article 8(2)(e)(vi) of the Statute and torture as a war crime under Article 8(2)(c)(i) of the Statute;¹⁰ and
- (ii) as regards crimes against humanity, the observations would also analyse the prior jurisprudence of the Court ¹¹ in light of the wider jurisprudence and practice relating to cumulative charging;
- (b) highlight the negotiating history and applicability of several key provisions of the Rome Statute and Elements of Crimes which consider cumulative charging, particularly in connection with crimes of sexual violence;
- (c) analyse how decisions on whether there should be cumulative charging to reflect the multi-faceted aspects of different crimes, take into account the Chamber's wider obligations under Article 21(3) of the Statute. In this context the United Nations Convention on the Elimination of All Forms of Discrimination Against Women, interpreted in light of the United Nations Committee on the Elimination of Discrimination Against Women's General Recommendation 19 which confirms that sexual violence against women is a form of gender-based discrimination,¹² is particularly relevant.

14. As regards individual charging, the proposed observations will touch on:

¹⁰ *Prosecutor v Jean-Pierre Bemba Gombo* (Decision Pursuant to Article 61(7)(a) and (b) of the Rome Statute on the Charges of the Prosecutor Against Jean-Pierre Bemba Gombo), ICC-01/05-01/08-424, PTC II, 15 June 2009, para 202; *Prosecutor v Jean-Pierre Bemba Gombo* (Decision on the Prosecutor's Application for Leave to Appeal the "Decision Pursuant to Article 61(7)(a) and (b) of the Rome Statute on the Charges of the Prosecutor Against Jean-Pierre Bemba Gombo"), ICC-01/05-01/08-532, PTC II, 18 September 2009, para 54 as explained by *Prosecutor v William Samoei Ruto, Henry Kiprono Kosgey and Joshua Arap Sang* (Decision on the Confirmation of Charges Pursuant to Article 61(7)(a) and (b) of the Rome Statute), ICC-01/09-01/11-373, PTC III, 23 January 2012, paras 279–281.

¹¹ *Prosecutor v Jean-Pierre Bemba Gombo* (Decision Pursuant to Article 61(7)(a) and (b) of the Rome Statute on the Charges of the Prosecutor Against Jean-Pierre Bemba Gombo), ICC-01/05-01/08-424, PTC II, 15 June 2009, paras 197–205.

¹² United Nations Committee on the Elimination of All Forms of Discrimination Against Women, General Recommendation No 19: Violence against women, UN Doc HRI/GEN/1/Rev.9 (Vol II), p 331.

(a) in what circumstances international law recognises being forced to witness rape as an act of torture;¹³ and

(b) in what circumstances sexual slavery can amount to torture.

Both of these questions are relevant given the nature of the facts as set out in the DCC.¹⁴

V. The Application

15. Rule 103(1) of the Rules of Procedure and Evidence provides:

At any stage of the proceedings, a Chamber may, if it considers it desirable for the proper determination of the case, invite or grant leave to a State, organization or person to submit, in writing or orally, any observation on any issue that the Chamber deems appropriate.

16. In determining whether a grant of leave is desirable, the Pre-Trial and Appeals Chambers have had regard to three considerations. The first is whether the relevant application relates to an issue that is before the competent Chamber.¹⁵ The second is whether the proposed observations “may assist” in the proper determination of the case.¹⁶ The third is that the decision of whether to accept the Application should be determined in light of the Chamber’s duty to ensure the expeditiousness of the proceedings as one of the fundamental tenets of fairness.¹⁷ Each will be addressed below in turn in relation to the character and scope of the proposed observations.

¹³ *Prosecutor v Furundžija* (Judgment), IT-95-17/1, Trial Chamber, 10 December 1988, para 267 wherein Witness D, who was beaten on the feet with a baton and forced to watch the repeated rapes of Witness A, was deemed to have been tortured.

¹⁴ DCC, paras 66–67, 72, 74, 77–79, 84, 89.

¹⁵ *Situation in Darfur, Sudan* (Decision on Application under Rule 103), ICC-02/05-185, PTC I, 4 February 2009, para 8. In this respect, Pre-Trial Chamber I has held that a Rule 103 application relates to an “issue” before the Chamber where that application relates to a “factor to be taken into consideration” by the Chamber: *Situation in Darfur, Sudan* (Decision on Application under Rule 103), ICC-02/05-185, PTC I, 4 February 2009, paras 9–10.

¹⁶ *Prosecutor v Thomas Lubanga Dyilo* (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”), ICC-01/04-01/06-1289, Appeals Chamber, 22 April 2008, para 8; *Prosecutor v Jean-Pierre Bemba Gombo* (Decision on Request for Leave to Submit Amicus Curiae Observations Pursuant to Rule 103 of the Rules of Procedure and Evidence), ICC-01/05-01/08-451, PTC II, 17 July 2009, para 11.

¹⁷ *Prosecutor v Jean-Pierre Bemba Gombo* (Decision on Application for Leave to Submit Amicus Curiae Observations Pursuant to Rule 103 of the Rules of Procedure and Evidence), ICC-01/05-01/08-504, PTC II, 4 September 2009, para 7.

V(i) The proposed observations relate to an issue that is before the competent Chamber

17. It is respectfully submitted that this application fits squarely within the issues before the Chamber pursuant to Article 61(7) of the Statute.
18. The proposed observations concern the use to which international law permits cumulative charging torture and sexual crimes such as rape and sexual slavery. The formulation of the crimes in the Statute was a significant development for the prosecution of sexual and gender based crimes under international law. The statutes of the *ad hoc* tribunals which preceded the establishment of the Court included rape only as a crime against humanity. The Rome Statute is the first instrument in international law to include an expansive list of sexual and gender based crimes as distinct war crimes in both international and non-international armed conflict. It also broadens the list of crimes against humanity to include not only rape but other forms of sexual violence as well as persecution on the basis of gender.
19. The Prosecutor, in her Draft Policy Paper on Sexual and Gender Based Crimes, released as recently as 7 February 2014,¹⁸ has acknowledged the importance of ensuring that perpetrators of sexual and gender based crimes are charged in a manner that accurately reflects the nature of the impugned conduct. The Draft Policy states:¹⁹

[T]he Office will ensure the inclusion of charges for sexual and gender based crimes, wherever there is sufficient evidence to support such charges.

In principle, the Office will bring, charges for sexual and gender based crimes explicitly as crimes in themselves, as well as charge these acts as forms of other violence within the competence of the Court, where the material elements are met, e.g. rape as torture. In such instances, the Office will seek to bring cumulative charges in order to fairly reflect the severity and multi-faceted character of sexual violence and to enunciate

¹⁸ Office of the Prosecutor, *DRAFT Policy Paper on Sexual and Gender Based Crimes*, 7 February 2014.

¹⁹ Ibid, paras 66–68.

the range of sexual and gender crimes supported by the evidence in each case.

Where supported by the evidence, the Office will also charge acts of sexual and gender based violence as different categories of crimes within the Court's jurisdiction (war crimes, crimes against humanity, genocide), in order to properly describe, *inter alia*, the nature, manner of commission, intent and context of each act.

20. It is submitted that it would be entirely appropriate for the Chamber to consider, as part of its mandate pursuant to Article 61(7)(c)(ii) whether further charges were warranted, in addition to rape and sexual slavery,²⁰ where the material elements of those further crimes are met. In particular, it would be appropriate for the Chamber to consider whether the facts pertaining to the rape and sexual slavery of civilians, as outlined in the DCC, appear to also establish the material elements of torture both as a crime against humanity and a war crime.²¹
21. Article 61(7)(c)(ii) of the Statute contemplates that an issue for determination by a Pre-Trial Chamber, in the discharge of its functions in a confirmation of charges hearing, is whether the evidence appears to establish a different crime within the jurisdiction of the Court. It is this issue to which the proposed observations relate. The interpretation of the word "case" in the phrase "proper determination of the case" in Rule 103(1) should not be construed in an unduly narrow manner such as to restrict observations to those that relate to the "case" or charges as presented by the Prosecutor in the DCC.²² To do so would be to undermine the Chamber's clear role pursuant to Article 61(7)(c)(ii).
22. In setting out the functions of the Chamber in a confirmation of charges hearing, Article 61(7) provides:

The Pre-Trial Chamber shall, on the basis of the hearing, determine whether there is sufficient evidence to establish substantial grounds to

²⁰ Ibid, fn 46.

²¹ DCC, paras 66–67, 72, 74, 77–79, 84, 89.

²² Cf *Prosecutor v Thomas Lubanga Dyilo* (Decision on Request pursuant to Rule 103(1) of the Statute [*sic*]), ICC-01/04-01/06-480, PTC I, 26 September 2006, pp 3–4.

believe that the person committed each of the crimes charged. Based on its determination, the Pre-Trial Chamber shall:

- (a) Confirm those charges in relation to which it has determined that there is sufficient evidence, and commit the person to a Trial Chamber for trial on the charges as confirmed;
- (b) Decline to confirm those charges in relation to which it has determined that there is insufficient evidence;
- (c) Adjourn the hearing and request the Prosecutor to consider:
 - (i) Providing further evidence or conducting further investigation with respect to a particular charge; or
 - (ii) Amending a charge because the evidence submitted appears to establish a different crime within the jurisdiction of the Court.

23. Pre-Trial Chamber III has explained the interpretation and application of Article 61(7) in its “Decision Adjourning the Hearing pursuant to Article 61(7)(c)(ii) of the Rome Statute” in the *Prosecutor v Jean-Pierre Bemba Gombo*.²³ That Decision discussed the substantially different nature of the determinations required under each sub-paragraph. In respect of Article 67(1)(c)(ii), Pre-Trial Chamber III stated:²⁴

24. ... in applying article 61(7)(c)(ii) of the Statute the Chamber has to make a determination based on a limited examination of the evidence submitted that leads the Chamber to conclude that the said evidence appears to establish a different crime within the jurisdiction of the Court. Thus, the starting point for the Chamber's determination at this stage is the “evidence submitted”.

25. ... Given the nature of the present stage of the proceedings, the Chamber is of the opinion that the threshold required for a determination under sub-paragraph (c)(ii) must inevitably be lower than the “substantial grounds to believe” set out in the chapeau of article 61(7) of the Statute. At this stage the Chamber is not called upon to prove that the requirements of the “different crime” are *definitely* satisfied. To make its determination under article 61(7)(c)(ii) of the Statute, the Chamber deems it sufficient to rather make a *prima facie* finding that it has doubts as to the legal characterisation of the facts as reflected in the document containing the charges. By way of a general review of the evidence and mere reference to it in its decision, the Chamber substantiates its finding that a different crime within the jurisdiction of the Court may have been committed. To this end, the Chamber needs only to indicate certain elements which may lead it to conclude that a different crime exists.

²³ *Prosecutor v Jean-Pierre Bemba Gombo* (Decision Adjourning the Hearing Pursuant to Article 61(7)(c)(ii) of the Rome Statute), ICC-01/05-01/08-388, PTC III, 3 March 2009, paras 9–39.

²⁴ *Ibid*, paras 24–25.

Accordingly, in the context of the present decision the Chamber will not conduct an in-depth analysis of the evidence. It will also not address its admissibility and probative value as this will be laid down in the final decision on the confirmation or not of the charges.

24. The Chamber has stated that Article 61(7)(c)(ii) only permits a Pre-Trial Chamber to request the Prosecutor consider amending a charge and not to request the Prosecutor consider adding a charge.²⁵ REDRESS respectfully submits that Article 61(7)(c)(ii) contemplates adding a charge. That is a form of amendment. This appears to have been the approach taken in the *Bemba* case.²⁶

25. The proposed observations, therefore, relate directly to an issue before the Chamber.

V(ii) *The proposed observations will assist in the proper determination of the issue*

26. The relevant threshold for a determination under Article 61(7)(c)(ii) to request the Prosecutor to consider amending the charges is relatively low: a *prima facie* finding of doubt as to the legal characterisation of the facts as reflected in the DCC.²⁷ Such doubt can arise from the existence of facts or statements of the parties that implicitly or explicitly refer to something which appears to establish the existence of a different, additional crime or mode of liability. The proposed observations would offer, in light of the facts as set out in the DCC, a detailed analysis of the international law concerning cumulative charges of torture and sexual crimes, such as rape and sexual slavery, which would assist the Chamber in determining whether to request the Prosecutor to consider amending the charges.

27. Further, as the DCC does not include torture, nor does it particularise the instances of rape and sexual slavery charged, the observations will not duplicate submissions of the parties.

²⁵ *Prosecutor v William Samoei Ruto, Henry Kiprono Kosgey and Joshua Arap Sang* (Decision on the Confirmation of Charges Pursuant to Article 61(7)(a) and (b) of the Rome Statute), ICC-01/09-01/11-373, PTC III, 23 January 2012, para 278.

²⁶ *Prosecutor v Jean-Pierre Bemba Gombo* (Decision Adjourning the Hearing Pursuant to Article 61(7)(c)(ii) of the Rome Statute), ICC-01/05-01/08-388, PTC III, 3 March 2009, paras 26, 41-46; *Prosecutor v Jean-Pierre Bemba Gombo* (Public Redacted Version of the Amended Document containing the charges filed on 30 March 2009), ICC-01/05-01/08-395-Anx3, PTC III, 30 March 2009, pp 33–37.

²⁷ *Prosecutor v Jean-Pierre Bemba Gombo* (Decision Adjourning the Hearing Pursuant to Article 61(7)(c)(ii) of the Rome Statute), ICC-01/05-01/08-388, PTC III, 3 March 2009, para 25.

V (iii) The granting of leave would not be detrimental to the fairness or expeditiousness of the proceedings

28. REDRESS acknowledges the importance of ensuring the fairness and expeditiousness of the proceedings such that the due process rights of the accused are protected.²⁸ REDRESS submits that the period of time between the conclusion of the confirmation of the charges hearing and the delivery of the decision on the confirmation of charges would present an adequate period of time for the parties to respond to the observations, should leave be granted. Further, as the application of Article 61(7)(c)(ii) does not require the presentation of further evidence,²⁹ if leave were granted and the prosecutor decided to amend the charges by including torture, this would not delay proceedings in any significant respect. In *Bemba Gombo*, upon Pre-Trial Chamber III adjourning the confirmation of charges hearing and requesting the Prosecutor to amend the charges, an amended DCC was presented in 27 days.
29. Further, in respect of the Chamber's concern that cumulative charging may be detrimental to the rights of the accused as it places an undue burden on the Defence,³⁰ REDRESS submits that the rights of the accused are not violated when alleged crimes are properly deemed cumulative in accordance with the test for cumulative charging.³¹

VI. Conclusion

30. Given the importance of these issues for this proceeding and for other proceedings involving rape and sexual violence which involve facts that may also amount to torture, and for all of the other foregoing reasons, REDRESS respectfully requests that the Chamber grant leave to REDRESS to submit written observations on the

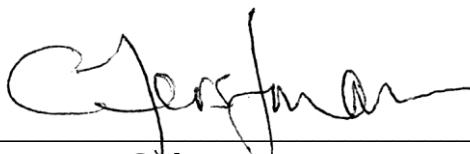
²⁸ The Statute, Article 67.

²⁹ *Prosecutor v Jean-Pierre Bemba Gombo* (Decision Adjourning the Hearing Pursuant to Article 61(7)(c)(ii) of the Rome Statute), ICC-01/05-01/08-388, PTC III, 3 March 2009, para 17.

³⁰ *Prosecutor v Jean-Pierre Bemba Gombo* (Decision Pursuant to Article 61(7)(a) and (b) of the Rome Statute on the Charges of the Prosecutor Against Jean-Pierre Bemba Gombo), ICC-01/05-01/08-424, PTC II, 15 June 2009, para 202.

³¹ *Prosecutor v Jean-Pierre Bemba Gombo* (Decision Pursuant to Article 61(7)(a) and (b) of the Rome Statute on the Charges of the Prosecutor Against Jean-Pierre Bemba Gombo), ICC-01/05-01/08-424, PTC II, 15 June 2009, para 202; *Prosecutor v Jean-Pierre Bemba Gombo* (Decision on the Prosecutor's Application for Leave to Appeal the "Decision Pursuant to Article 61(7)(a) and (b) of the Rome Statute on the Charges of the Prosecutor Against Jean-Pierre Bemba Gombo"), ICC-01/05-01/08-532, PTC II, 18 September 2009, para 54 as explained by *Prosecutor v William Samoei Ruto, Henry Kiprono Kosgey and Joshua Arap Sang* (Decision on the Confirmation of Charges Pursuant to Article 61(7)(a) and (b) of the Rome Statute), ICC-01/09-01/11-373, PTC III, 23 January 2012, paras 279–281.

above mentioned issues within a determined time limit, pursuant to Rule 103 of the Rules of Procedure and Evidence.

A handwritten signature in black ink, appearing to read 'C. Ferstman', is positioned above a horizontal line.

Carla Ferstman

Director, REDRESS

Dated this 13 February 2014

At London, United Kingdom