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**International
Criminal
Court**

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TRIAL CHAMBER IV

Before: Judge Joyce Aluoch, Presiding Judge
Judge Silvia Fernandez de Gurmendi
Judge Chile Eboe-Osuji

SITUATION IN DARFUR, THE SUDAN

IN THE CASE OF THE PROSECUTOR

V.

ABDALLAH BANDA ABAKAER NOURAIN

**Public Document
with Confidential Redacted Version of Annexes "A" to "N"**

**Public Redacted Version of "Consolidated Prosecution Application for Redactions"
filed on 25 June 2014 (ICC-02/05-03/09-588-Conf-Exp)**

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

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Introduction

1. The Prosecution hereby requests authorisation, pursuant to Articles 54(3)(f) and 68(1) of the Rome Statute (“Statute”) and Rules 81(2) and 81(4) of the Rules of Procedure and Evidence (“Rules”), for redactions applied in the material disclosed between 2 May 2013 and the present date, including the related metadata.¹ In addition, the Prosecution informs the Chamber of Rule 81(1) redactions that continue to apply to protect internal work product in several of these documents. The redactions sought pertain to information that, if withheld, do not affect the Accused’s understanding of the material disclosed, do not affect any exculpatory or Rule 77 value contained in the material, and do not impact on his ability to meet the Prosecution’s case. Accordingly, the redactions are not prejudicial to, or inconsistent with, the rights of the Accused.

Confidentiality

2. The Prosecution submits this application and its annexes “Confidential, *EX PARTE*, Prosecution and VWU only” because they contain materials disclosed to the Defence in redacted form, and contain information for which authorisation for redactions is sought. Providing the Defence access to this information would defeat the purpose of the application. To enable the Defence to respond to this application, the *ex parte* annexes are identified by ERN,² so that the Defence can refer to the redacted materials. A public redacted version of the application and confidential redacted version of the annexes will be filed shortly.

¹ The Prosecution notes that in the interests of judicial economy the Prosecution chose to file a consolidated application addressing all pending redaction requests.

² Footnotes 26-39, 47-55, 57, 59-61.

Procedural history and identification of the material to which the redactions are applied

3. On 6 March 2013, the Chamber issued the decision setting 2 May 2013 as the final disclosure deadline.³

4. On 2 May 2013, the Prosecution disclosed the following material, among others, with redactions applied to the metadata and/or content: (i) screening notes of trial witnesses P-0439, P-0442, P-0445, and P-0486; (ii) interview transcripts and related material, including 239 photographs,⁴ of witness P-0441; (iii) second non-signed statement of witness P-0466. The Prosecution applied redactions to the names of [REDACTED] in the metadata of some of these items.⁵ On the same day, the Prosecution disclosed identities of three non-trial witnesses P-0304, P-0305 and P-0306, along with their prior statements [REDACTED], which had been previously withheld from disclosure pursuant to an order of the Chamber.⁶ The Prosecution applied redaction to the name of [REDACTED] in the metadata of the three (3) disclosed non-ICC prior statements.

5. In September and October 2013, the Prosecution interviewed [REDACTED] (witness P-0449)⁷ and [REDACTED] (witness P-0450)⁸ who were stationed at the MGS Haskanita at the time of the attack.⁹

³ ICC-02/05-03/09-455, para. 25(iii)-(iv).

⁴ See [REDACTED].

⁵ Screening notes of witnesses P-0439 and P-0442, and 239 photographs provided by witness P-0441.

⁶ [REDACTED].

⁷ Witness P-0449 was interviewed on 11 and 12 September 2013.

⁸ Witness P-0450 was interviewed between 21 and 23 October 2013.

⁹ Witness P-0450 provided several documents related to his employment [REDACTED].

6. On 19 November 2013, the Chamber issued the “Decision establishing simplified proceedings related to future applications for non-disclosure”, in which it identified three categories of information in respect of which the redaction process was to be effected *inter partes* and no longer required “a case-by-case assessment by the Chamber” (“Chamber’s 19 November 2013 decision”).¹⁰ These categories are: (i) identifying and contact information of investigators; (ii) identifying and contact information of translators and interpreters; and (iii) identifying and contact information of family members of witnesses.¹¹

7. On 6 December 2013, the Prosecution disclosed screening notes of trial witness P-0419, pursuant to a request from the Defence.¹² Pursuant to Rule 77 of the Rules, the Prosecution also disclosed the newly collected statements and witness related materials of witnesses P-0449 and P-0450, three of which contained content redactions.¹³

8. On 7 April 2014, the Prosecution disclosed a witness statement of [REDACTED] (witness P-0002),¹⁴ along with the [REDACTED] material requested by the Defence, with certain redactions applied to the content or metadata.¹⁵

¹⁰ ICC-02/05-03/09-524, paras. 36-42.

¹¹ ICC-02/05-03/09-524, para. 36.

¹² ICC-02/05-03/09-534, para. 1.

¹³ On 27 February 2014, the Prosecution disclosed annexes of witness P-0450’s statement (*see* ICC-02/05-03/09-544, para. 1). These included Annexes D.2 and D.3 which were disclosed with redactions to the content.

¹⁴ The Prosecution interviewed [REDACTED] in the course of its investigations into the crimes against the civilian population of Darfur.

¹⁵ Content redactions were applied in the witness statement of [REDACTED]. The Prosecution also redacted the name of [REDACTED] in the metadata of [REDACTED]; DAR-OTP-0060-0020.

9. Between 12 March and 6 April 2014, the Prosecution interviewed three new witnesses, including P-0455 and P-0460, and re-interviewed two of its trial witnesses – P-0419 and P-0446 - and immediately thereafter disclosed the statements and related witness material, including the screening notes, to the Defence.¹⁶ Of the disclosed material, 14 items contained redactions, including the metadata redactions, that did not fall within the three categories simplified by the Chamber.

10. On 11 April 2014, the Prosecution filed an application seeking to add, *inter alia*, (i) the re-interview statements from witnesses P-0419 and P-0446, (ii) the new statements from witnesses P-0455 and P-0460, and (iii) the statements of witnesses P-0449 and P-0441, along with the related witness material, to the Prosecution's evidence list.¹⁷

Submissions

A. Scope of redactions sought

11. The Prosecution's application for redactions relates to the material disclosed between 2 May 2013 and the present date ("disclosed material"), including the statements and related material of six witnesses¹⁸ that are sought to be added to the Prosecution's evidence list. Whilst the Prosecution implemented redactions relying on the simplified redaction regime established in paragraphs 39-42 of the Chamber's 19

¹⁶ ICC-02/05-03/09-546 and ICC-02/05-03/09-579.

¹⁷ ICC-02/05-03/09-557-Conf & Anxs. The Prosecution's application is currently pending with the Chamber.

¹⁸ Witnesses P-0419, P-0441, P-0446, P-0449, P-0455 and P-0460.

November 2013 decision,¹⁹ it seizes the Chamber in relation to those redactions that fall *outside* the three categories to which the simplified regime applies.²⁰

B. Necessity for redactions and impact on rights of the Accused

12. Redactions sought in the current application relate, *inter alia*, to the information on the personal security, dignity and privacy of witnesses or other persons who may be at risk on account of the activities of the Court, pursuant to Articles 54(3)(f) and 68(1) of the Statute and Rule 81(4) of the Rules. The Prosecution also seeks certain redactions in order to preserve the interests of its future or ongoing investigations pursuant to Rule 81(2).

13. The Appeals Chamber has established that the following requirements apply to requests for redactions under Rule 81(2) or (4):

- (i) There is an objectively justifiable risk that the disclosure to the accused of the information sought to be redacted could: (i) prejudice ongoing or further investigations (Rule 81(2)); (ii) affect the confidential character of the information under Articles 54, 72 and 93 of the Statute (Rule 81(4)); or (iii) affect the safety of witnesses, victims and members of their families (Rule 81(4));²¹

¹⁹ The Prosecution proposes to apply the simplified redaction regime retroactively – to also extend to the material disclosed prior to the issuance of Chamber’s 19 November 2013 decision, provided that the redacted information falls within the three categories identified in paragraph 36 of the said decision. Hence, the Prosecution does not seize the Chamber in respect of this material.

²⁰ In reviewing the disclosed material the Prosecution identified several instances, in which redactions were no longer justified considering the current stage of the proceedings. The Prosecution will not seize the Chamber in respect of those redactions. The Prosecution will instead re-disclose the material with the relevant redactions lifted.

²¹ ICC-01/04-01/07-475, paras. 71 and 97; ICC-01/04-01/07-476, para. 60.

(ii) The risk arises from disclosing the particular information to the accused as opposed to disclosing the information to the public at large;²²

(iii) Less restrictive protective measures are not feasible or sufficient;²³

(iv) The redactions sought are not prejudicial to, or inconsistent with, the rights of the accused and the requirements of a fair and impartial trial.²⁴

14. Guided by the above criteria, the Prosecution submits that for the redactions sought,²⁵ (i) there is an objectively justifiable risk associated with the disclosure, and, (ii) that the risk can be managed or mitigated only if the identities and the relevant personal or contact information of the individuals concerned, or designation of specific interview locations, are withheld from the Accused. Accordingly, the redactions are necessary and are the least intrusive measures that can be imposed to protect the safety, security and/or privacy of the persons in respect of whom they are being sought or, where appropriate, to preserve the interests of future or ongoing investigations. Further, the redactions are not prejudicial to, or inconsistent with, the rights of the Accused since none of the redactions affect the content of the material or otherwise conceals the information that is material for the preparation of the defence.

15. The present application for redactions pertains to four categories of information, as follows:

²² ICC-01/04-01/07-475, para. 71; ICC-01/04-01/07-476, para. 60.

²³ ICC-01/04-01/06-568, para. 37; ICC-01/04-01/06-773, para. 33; ICC-01/04-01/07-475, para. 72 (a); ICC-01/04-01/07-476, para. 61.

²⁴ ICC-01/04-01/06-773, para. 34; ICC-01/04-01/07-476, para. 63.

²⁵ See details in the individual charts at Confidential, *ex parte* Annexes "A" to "N".

(1) Personal and contact information of the Prosecution witnesses – Rule 81(4)

16. Under this category, the Prosecution requests authorisation for redactions to:

- i. Place of residence of witnesses P-0419,²⁶ P-0445,²⁷ P-0446,²⁸ P-0449,²⁹ and P-0455;³⁰
- ii. E-mail addresses of witnesses P-0446,³¹ P-0460,³² and P-0486,³³ and the e-mail address used by witness P-0460 during his time in Haskanita;³⁴
- iii. Personal telephone numbers of witnesses P-0446,³⁵ P-0455,³⁶ P-0460,³⁷ and P-0486;³⁸
- iv. Passport number of witness P-0450.³⁹

17. Articles 68(1) and 53(3)(f) provide for the protection of the safety, physical and psychological well-being, dignity and privacy of victims and witnesses and by extension, other persons put at risk on account of the activities of the Court.⁴⁰

²⁶ Annex A, DAR-OTP-0189-0153, p. 0153.

²⁷ Annex E, DAR-OTP-0169-0805, p. 0805.

²⁸ Annex F, DAR-OTP-0189-0470, p. 0470, DAR-OTP-0190-0222, p. 0222.

²⁹ Annex G, DAR-OTP-0188-0207, p. 0207.

³⁰ Annex I, DAR-OTP-0173-0032, p. 0032, DAR-OTP-0190-0129, p. 0137.

³¹ Annex F, DAR-OTP-0189-0470, p. 0476, para. 33; Annex F, DAR-OTP-0191-0043, p. 0043.

³² Annex J, DAR-OTP-0186-0301, p. 0301.

³³ Annex L, DAR-OTP-0186-0277, p. 0277; Annex F, DAR-OTP-0191-0043, p. 0043.

³⁴ Annex J, DAR-OTP-0190-0156, p. 0162, para. 34.

³⁵ Annex F, DAR-OTP-0191-0043, p. 0043.

³⁶ Annex I, DAR-OTP-0190-0129, p. 0137.

³⁷ Annex J, DAR-OTP-0186-0301, p. 0301.

³⁸ Annex L, DAR-OTP-0186-0277, p. 0277; Annex F, DAR-OTP-0191-0043, p. 0043.

³⁹ Annex H, DAR-OTP-0188-1019, p. 1019, DAR-OTP-0188-1020, p. 1020.

⁴⁰ See ICC-02/05-03/09-363-Conf, para. 24, referring to *The Prosecutor v. Germain Katanga*, Appeals Chamber, Judgment on the appeal of the Prosecutor against the decision of Pre-Trial Chamber I entitled "First Decision on the Prosecution Request for Authorisation to Redact Witness Statements", 13 May 2008, ICC-01/04-01/07-475, para. 1.

Chambers of this Court have consistently accepted that disclosure of personal and contact details, including the location or place of residence, of witnesses may pose an unjustifiable risk to the safety and/or physical and psychological well-being, and where appropriate compromise the privacy, of witnesses and their family members, and authorised redactions on that basis.⁴¹ Pre-Trial Chamber I in *Abu Garda* and the current case particularly emphasised the need for protection of information relating to the place of residence or whereabouts of witnesses' and their family members "in order to preserve their privacy from unnecessary intrusion."⁴² This Chamber has similarly authorised redactions to the place of residence of a Prosecution witness affirming that "[t]he redactions protect the privacy of the individuals involved" in pursuance of Articles 54(3)(f), and 68(1) of the Statute.⁴³

18. Disclosure of the private contact details, including the place of residence, of witnesses whose material is subject of this application may infringe upon the right of privacy of those witnesses and that of their families. Further, as previously acknowledged by the Chamber, information about the place of residence of a witness, as recorded in the witness statement, is irrelevant and does "not affect the understanding and legibility of the statement[sic]" in which it occurs.⁴⁴ Nor does this

⁴¹ See, for example, for witness's place of residence and whereabouts: ICC-02/05-03/09-363-Conf, paras. 20-22; ICC-02/05-02/09-58-RSC, paras. 22-23; ICC-01/04-01/10-167, paras. 25-27. For contact details: ICC-01/04-01/07-1099-tENG, para. 31; ICC-01/04-01/07-1101-tENG, para. 42; ICC-01/04-01/06-2597-Red, paras. 34-38.

⁴² ICC-02/05-03/09-58, para. 7. PTC I in *Abu Garda proprio motu* ordered redaction of "any and all information relating to the witness's current place of residence or whereabouts [...] with a view to ensuring the protection of the witnesses' and witnesses' families privacy pursuant to article 57(3)(c) and 68(1) of the Statute." (ICC-02/05-02/09-58-RSC, paras. 22-23).

⁴³ ICC-02/05-03/09-524, paras. 29-30.

⁴⁴ ICC-02/05-03/09-524, para. 29.

information have any utility for purposes of the potential defence investigations.⁴⁵

Further, as previously accepted by the Chamber [REDACTED].⁴⁶

19. In relation to the identity card/passport numbers of Prosecution witnesses, the Prosecution acknowledges that the information may have some remote investigative utility for the Defence; however, interests of confidentiality and privacy outweigh any potential prejudice to the Defence and militate against disclosure.

(2) Identifying and contact information of certain third parties – Rule 81(4)

20. Under this category, the Prosecution requests authorisation for redactions to the identifying and/or contact information of certain third parties, who appear to have provided information to, or been otherwise associated with or of interest for, the Prosecution witnesses in whose material they feature, in particular:

- i. Passport number of a third party individual mentioned in the annex to witness P-0450's statement (Annex D.2);⁴⁷
- ii. Name and position of [REDACTED] who facilitated the Prosecution's contact with witness P-0419 for the purposes of his initial screening;⁴⁸
- iii. Certain identifying and/or contact information of the individuals who were [REDACTED] (witness P-0002) or who otherwise appear to be of interest for

⁴⁵ See ICC-02/05-03/09-524, para. 29, in which the Chamber stressed that "if the defence wishes to contact the witness, it is free to do so following the appropriate procedure as stipulated" in the Protocol adopted by the Chamber (ICC-02/05-03/09-451 & ICC-02/05-03/09-451-Anx).

⁴⁶ [REDACTED].

⁴⁷ Annex H, DAR-OTP-0188-1019, p. 1019.

⁴⁸ Annex A, DAR-OTP-0188-1049, p. 1049.

- him as the source of information [REDACTED]: (i) [REDACTED],⁴⁹ (ii) [REDACTED],⁵⁰ (iii) [REDACTED],⁵¹ and (iv) [REDACTED];⁵²
- iv. Names of [REDACTED] who appear to have assisted [REDACTED] (witness P-0002) [REDACTED];⁵³
- v. Specific contact information (telephone numbers and email addresses) of [REDACTED].⁵⁴

21. None of these individuals are witnesses or prospective witnesses for the Prosecution or are in any other way related to the activities of the Court. However, the contexts in which these individuals' names or contact information appear in the disclosed material (i) may give rise to an erroneous perception that they are in fact witnesses, potential witnesses or otherwise of interest for the Prosecution as potential sources or leads, thereby, (ii) putting their safety, well-being and privacy at risk on account of such misapprehension. Although the Prosecution does not have any information about the current whereabouts or the specific security status of these individuals, redactions applied to their identities and contact details, where applicable, are believed to be the least intrusive measure available to protect their safety, privacy and well-being from unnecessary intrusion. The Prosecution will endeavour to assess any information that it receives regarding the security situation of these third parties and inform the Chamber if/when it is able to positively confirm any change in their security status obviating the need for protective measures.

⁴⁹ Annex M, DAR-OTP-0070-0002, p. 0004.

⁵⁰ Annex M, DAR-OTP-0070-0002, p. 0005.

⁵¹ Annex M, DAR-OTP-0070-0002, p. 0011.

⁵² Annex M, DAR-OTP-0070-0002, p. 0011.

⁵³ Annex M, DAR-OTP-0070-0002, p. 0011.

⁵⁴ Annex F, DAR-OTP-0191-0043, p. 0043.

22. Under this category the Prosecution also seeks authorisation to redact identifying information of [REDACTED],⁵⁵ [REDACTED]. It is noted that the Chamber has previously authorised redaction of the identifying information of this individual, regarding him, [REDACTED], “as a person at risk on account of the activities of the Court”.⁵⁶ His professional situation previously justifying the imposition of redactions to his identity has not changed.

(3) OTP field staff – Rules 81(2) and 81(4)

23. Under this category, the Prosecution seeks authorisation to redact identifying information of [REDACTED] whose name and signature appear in the content and/or metadata of two photographs, and the related handover statement, collected from P-0441.⁵⁷

24. The Chambers of this Court have consistently authorised redactions to the names and identifying information of staff working in and/or for the OTP, who participated in interviews or otherwise facilitated investigations, whether present at the interview

⁵⁵ Annex C, DAR-OTP-0172-0650, p. 0650 (and related metadata); Annex B, DAR-OTP-0168-0457, p. 0457 (and related metadata), DAR-OTP-0171-0592, p. 0592, DAR-OTP-0173-0364, pp. 0364-0373 and 0378-0388 (and related metadata), DAR-OTP-0173-0389, pp. 0389-0393 (and related metadata); Annex D, DAR-OTP-0170-0002, p. 0002 (and related metadata); Annex K, DAR-OTP-0181-0257, pp. 0258-0259, 0287 (and related metadata). Metadata redactions are also sought in (i) the photographs provided by witness P-0441 (DAR-OTP-0178-0071 through 0307, DAR-OTP-0172-0702 and DAR-OTP-0172-0703) and (ii) non-ICC prior statements of witnesses P-0304, P-0305 and P-0306 (DAR-OTP-0157-1080, DAR-OTP-0157-1075 and DAR-OTP-0157-1072), which do not contain any content redactions and are not included in the relevant annexes therefore.

⁵⁶ [REDACTED].

⁵⁷ Annex B, DAR-OTP-0172-0708, p. 0708 and related metadata. The two photographs - DAR-OTP-0172-0702 and DAR-OTP-0172-0703 do not contain any content redactions and are not included in the annex therefore.

or otherwise mentioned.⁵⁸ Indeed, their situation is not dissimilar to that of investigators.

25. The OTP field officer whose identity redactions are sought is currently based in [REDACTED] and is required to travel to conflict regions, [REDACTED], as part of his official duties. The Prosecution maintains that should his identity be disclosed to the Defence, his presence in the field could be easily traced posing a risk to his safety and security, thereby jeopardising the Prosecution's ongoing investigations the field officer facilitates. Further, disclosing the identity of this individual may make surveillance of his activities easier, thus heightening the potential risks to witnesses or prospective witnesses and other individuals whom he meets or collaborates with in the course of performance of his duties. Non-disclosure of his identity is necessary to minimise the chances of any such link being made and is the least intrusive protective measure available in this regard. Considering the minimal nature of the redactions sought, the requested non-disclosure is not inconsistent with the rights of the Accused.

(4) Interview locations – Rule 81(2)

26. Under this category, the Prosecution requests authorisation for redaction of specific locations used by the Prosecution for interviewing witnesses P-0419,⁵⁹ P-0441⁶⁰ and P-0466⁶¹ as recorded in their statements/interview transcript. Whilst disclosing the general information about the place of interview, such as reference to the country,

⁵⁸ See, for example, ICC-02/05-03/09-524, paras. 36-42; ICC-02/11-01/11-74-Red, paras. 87-91; ICC-02/05-03/09-58, para. 4; ICC-02/05-03/09-265-Red, paras. 34-36. See also ICC-01/09-02/11-495-AnxA-Corr, paras. 32-35 (Categories "A.2" and "A.3").

⁵⁹ Annex A, DAR-OTP-0189-0153, p. 0153.

⁶⁰ Annex B, DAR-OTP-0173-0364, p. 0365, lines 8-9.

⁶¹ Annex K, DAR-OTP-0181-0257, p. 0257.

the Prosecution seeks authorisation to redact specific identifying information of the interview location, such as the specific address details or the name of the location where the interview was conducted. The current application is consistent with the Court's established jurisprudence in this regard.⁶²

27. The Prosecution seeks this redaction in order to preserve the interests of any future or ongoing investigations, not necessarily in this case, pursuant to Rule 81(2). The Prosecution maintains that disclosing specific information that may identify locations used by the OTP staff for conducting interviews with witnesses will render it impossible or more difficult for the OTP to use the same locations for future interviews. In view of the limited number of the locations where OTP staff are able to conduct interviews, there is no less intrusive measure available to protect the investigative interest at stake. Lastly, the information sought to be redacted has no relevance for the Defence preparations, and therefore the requested redactions are consistent with fair trial rights of the Accused.

C. Description of annexes

28. The Prosecution submits to the Chamber the documents in the form disclosed to the Defence – containing redactions for which authorisation is being sought. For the Chamber's convenience, the Prosecution has colour-coded the redactions sought – using the blue colour to represent redactions pursuant to Rule 81(2) and red to

⁶² ICC-02/05-03/09-58, para. 5; ICC-02/05-03/09-265-Red, paras. 35-36; ICC-02/11-01/11-74-Red, paras. 93-94, 96-97; ICC-01/09-02/11-495-AnxA-Corr, paras. 30-31; ICC-01/04-01/07-475, paras. 89-108, 110.

represent redactions pursuant to Rule 81(4).⁶³ The Prosecution has also marked the information that is protected from disclosure pursuant to the ‘internal work product’ doctrine under Rule 81(1) or is otherwise non-disclosable. In the Charts the Prosecution also sets out (i) the specific information sought to be redacted, and (ii) the legal basis and justification for each redaction sought.

29. All of these documents are annexed to this application as Confidential, *EX PARTE* Annexes “A” to “N”:

Annex “A” – justification chart and material related to witness **P-0419**;

Annex “B” – justification chart and material related to witness **P-0441**;

Annex “C” – justification chart and material related to witness **P-0439**;

Annex “D” – justification chart and material related to witness **P-0442**;

Annex “E” – justification chart and material related to witness **P-0445**;

Annex “F” – justification chart and material related to witness **P-0446**;

Annex “G” – justification chart and material related to witness **P-0449**;

Annex “H” – justification chart and material related to witness **P-0450**;

Annex “I” – justification chart and material related to witness **P-0455**;

Annex “J” – justification chart and material related to witness **P-0460**;

Annex “K” – justification chart and material related to witness **P-0466**;

Annex “L” – justification chart and material related to witness **P-0486**;

Annex “M” – justification chart and material related to witness **P-0002**;

⁶³ Redactions marked with black and white boxes relate to the information that falls within the simplified redaction regime and do not form part of the redactions for which the Chamber’s authorisation is sought in the Application (see paragraph 11 above).

Annex “N” – justification chart related to witnesses **P-0304, P-0305** and **P-0306**.⁶⁴

Relief sought

30. For the reasons set out above, the Prosecution respectfully requests the Chamber to authorise, retroactively, the redactions applied in the material submitted with this application, as well as to the relevant metadata where applicable.



Fatou Bensouda

Prosecutor

Dated this 30th day of June 2014

At The Hague, The Netherlands

⁶⁴ The materials related to these witnesses do not contain any content redactions and for that reason, are not included in the annex.