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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

Public Redacted Version of “Defence request for recall of Witness P-178”

Source: Defence for Mr. Jean-Pierre Bemba Gombo

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

The Office of the Prosecutor

Fatou Bensouda

Jean-Jacques Badibanga

Counsel for the Defence

Peter Haynes QC

Kate Gibson

Melinda Taylor

Legal Representatives of the Victims

Marie-Edith Douzima-Lawson

Legal Representatives of the Applicants

Unrepresented Victims

Unrepresented

(Participation/Reparation)

Applicants

The Office of Public Counsel for the Victims

Paolina Massidda

The Office of Public Counsel for the Defence

Xavier-Jean Keita

States' Representatives

Amicus Curiae

REGISTRY

Registrar

Herman von Hebel

Defence Support Section

Deputy Registrar

Victims and Witnesses Unit

Nigel Verrill

Detention Section

**Victims Participation and Reparations Other
Section**

A. INTRODUCTION

1. It is a significant feature of the present proceedings that, despite protective measures having been ordered for 22 Prosecution witnesses coming from the [REDACTED], and despite protestations from these witnesses that they kept the fact of their testimony a secret, an accurate list [REDACTED]¹ (“the List”). [REDACTED].

2. In the context of the evidence heard in this case about the stigma associated with being a victim of sexual crime in the Central African Republic,² the existence of a complete list of [REDACTED] poses an incomprehensible risk to the quality of life of [REDACTED]. The List is also necessarily demonstrative of a breach of Trial Chamber III’s (“the Chamber”) protective measures, and is evidence of contact between Prosecution witnesses [REDACTED].³ Given the title of the List, and the link between payments to witnesses and their resultant credibility,⁴ the List necessarily raises questions as to the motivation and veracity of all witnesses [REDACTED].

3. Between 22 and 24 October 2014, the Chamber heard evidence from P-169; the [REDACTED] the List on at least three occasions.⁵ P-169 corroborated previous statements to VWU⁶ that the List [REDACTED]:⁷

[REDACTED]

¹ [REDACTED].

² See, for example, P-42, T-64, p.21, lines 7-14.

³ [REDACTED].

⁴ *Prosecutor v Martić*, Case No. IT-95-11-T, Judgment, 12 June 2007, paras. 36–38; *Prosecutor v Karemera et al.*, Case No. ICTR-98-44-T, Decision on Joseph Nzirorera’s Motion to Dismiss for Abuse of Process: Payments to Prosecution Witnesses, 27 October 2008; *Prosecutor v. Haradinaj et al.*, IT-04-84bis-T, Decision on Joint Defence Motion for Relief from Rule 68 Violations by the Prosecution and for Sanctions Pursuant to Rule 68bis, 12 October 2011, para. 45.

⁵ CAR-OTP-0072-0504_R01; CAR-OTP-0072-0508_R01, CAR-OTP-0083-1212.

⁶ ICC-01/05-01/08-3099-Conf, para. 4; ICC-01/05-01/08-3143-Conf-Anx-Corr-Red, p.2.

⁷ [REDACTED].

4. Despite having now heard the testimony of P-169, the Chamber, parties and participants are no closer to knowing how the List was created, and the level of contact and/or collusion as between the Prosecution witnesses which brought about its compilation. In the Defence submission, this question must be explored. Any trial which proceeds to Judgment with such a significant question mark hanging over the motivation of Prosecution witnesses and their level of interaction will be necessarily exposed to attack.

5. Moreover, the central theme of P-169's recent testimony was an insistence that, in fact, it was [REDACTED] of the scheme to extort money from the ICC on the part of Prosecution witnesses.⁸ [REDACTED]⁹ According to P-169, it was P-178 [REDACTED] of seeking further payments from the Court,¹⁰ [REDACTED] the List,¹¹ [REDACTED]¹² and who [REDACTED].¹³ It appears, therefore, that P-178's evidence on these matters is of more significance to the Chamber's search for the truth than that of P-169. At the very least, P-178 should be given a chance to defend himself against, or provide further information concerning P-169's claims [REDACTED].

6. In addition, following an order by the Chamber,¹⁴ the Prosecution has now disclosed records of its contact with P-178.¹⁵ The Defence had first asked for these records in November 2013, nearly 12 months ago,¹⁶ with the Prosecution simply arguing that Defence request was "without merit".¹⁷ These newly-disclosed records detail a history of P-178's practice of contacting the Prosecution by telephone and

⁸ [REDACTED].

⁹ [REDACTED].

¹⁰ [REDACTED].

¹¹ [REDACTED].

¹² [REDACTED].

¹³ [REDACTED].

¹⁴ ICC-01/05-01/08-3159-Conf.

¹⁵ CAR-OTP-0083-1489_R01.

¹⁶ ICC-01/05-01/08-2872-Conf, para. 50.

¹⁷ ICC-01/05-01/08-2897-Conf, para. 13.

demanding money.¹⁸ They also detail his claim that he has “consulted the ICC’s other witnesses” who are “not happy”.¹⁹ These materials were patently disclosable at the time of their creation. Their late disclosure has caused prejudice to the Accused, given the light that they shed on issues which have been litigated over the course of the past 12 months.²⁰

7. P-178 accordingly holds the key to a number of outstanding and significant questions which hang over the Prosecution case. For the reasons set out below, the Defence asks that the Chamber order his recall.

B. APPLICABLE LAW

8. The Trial Chamber has held that in exceptional circumstances a case may be reopened to permit the presentation of “fresh” evidence.” Fresh evidence includes not only evidence which was not available at the closing of the case but also evidence that was previously available but **“the importance of which was revealed only in light of new evidence”**.²¹

9. On determining whether there are sufficient grounds to recall a witness, the Chamber shall consider whether “good cause” to recall the witness has been demonstrated.²²

¹⁸ CAR-OTP-0083-1489_R01 at 1490 and 1491.

¹⁹ CAR-OTP-0083-1489_R01 at 1491.

²⁰ ICC-01/05-01/08-2872-Conf; ICC-01/05-01/08-2932-Conf; ICC-01/05-01/08-2939-Conf; ICC-01/05-01/08-3005; ICC-01/05-01/08-3013-Conf; ICC-01/05-01/08-3139-Conf; ICC-01/05-01/08-3146-Conf.

²¹ ICC-01/05-01/08-3154-Conf, para. 25 (emphasis added).

²² ICC-01/05-01/08-3154-Conf, para. 27, citing: Decision on "Defence Motion concerning 'Information on contacts [of] Witnesses 169 and 178 with other witnesses'", 18 December 2013, ICC-01/05-01/08-2924-Conf, paragraph 35. ICTR, Prosecutor v. Bagosora et al, Case No. ICTR-98-41-T, Trial Chamber I, Decision on the Defence Motion to Recall Prosecution Witness OAB for Cross-Examination, 19 September 2005, paragraph 2; ICTY, Prosecutor v. Ante Gotovina et al., Case No. IT-06-90-T, Trial Chamber I, Decision on prosecution motion to recall Marko Rajčić, 24 April 2009, paragraph 10; ICTR, Prosecutor v. Kayishema and Ruzindana, Case No. ICTR-95-1-T, Trial Chamber H, Decision on the Defence Motion for the Re-examination of Defence Witness DE, 1 August 1998, paragraph 14. In assessing good cause, it has been held that a Chamber should consider the purpose for recalling the witness as well as the applicant's justification for not eliciting the relevant evidence from the

C. SUBMISSIONS

(a) Recall on the basis of P-178's central role

10. This is not the first time the Chamber has been seized with a request for P-178's recall. On 7 November 2013, the Defence asked the Chamber to recall both P-169 and P-178.²³ The request was rejected,²⁴ as was leave to appeal.²⁵

11. The Chamber's refusal to order recall either P-169 or P-178 appeared to hang on the Defence's submission that disclosure of information requested by the Defence and "put into admissible form for reception into evidence, may well obviate the need for the recall of any witnesses".²⁶ The information requested by the Defence included records of payments to, and contacts between, the Prosecution and P-169 and P-178.²⁷ This information has only now been disclosed.²⁸

12. Since the Chamber's decision rejecting the recall of P-178, the situation has altered significantly. This is due, in part, to the following:

- The VWU Reports of 27 June 2014,²⁹ and 18 September 2014³⁰ which indicate that, according to P-169, the List was [REDACTED] P-178;

witness when he or she originally testified: ICTY, Prosecutor v. Ante Gotovina et al., Case No. IT-06-90-T, Trial Chamber I, Decision on prosecution motion to recall Marko Rajčić, 24 April 2009, paragraph 10; ICTR, Prosecutor v. Bagosora et al. Case No. ICTR-98-41-T, Trial Chamber I, Decision on the Defence Motion to Recall Prosecution Witness OAB for Cross-Examination, 19 September 2005, paragraph 2.

²³ ICC-01/05-01/08-2872-Conf.

²⁴ ICC-01/05-01/08-2924-Conf.

²⁵ ICC-01/05-01/08-2980-Conf.

²⁶ ICC-01/05-01/08-2924-Conf, para. 36, citing: ICC-01/05-01/08-2872-Conf, para. 49.

²⁷ ICC-01/05-01/08-2872-Conf, para. 50.

²⁸ ICC-01/05-01/08-3171-Conf; ICC-01/05-01/08-3171-Conf-Anxs.

²⁹ ICC-01/05-01/08-3099-Conf, para. 4.

³⁰ ICC-01/05-01/08-3143-Conf-Anx-Corr-Red, p.2.

- The disclosure of P-169's letters of [REDACTED],³¹ and [REDACTED],³² which evince an ongoing intention to put pressure on the Court for financial gain;
- P-169's testimony implicating P-178 as the person who "[REDACTED]" of seeking further payments from the Court,³³ who [REDACTED] the List,³⁴ who "[REDACTED],"³⁵ and who [REDACTED];³⁶
- The late disclosure, on 22 October 2014, of records of contact between the Prosecution and P-178 concerning his repeated requests for money and [REDACTED];³⁷ and
- The Chamber's order that P-169 provide [REDACTED].³⁸

13. P-178's additional testimony is accordingly of relevance to the credibility of his original evidence before the Chamber, the testimony of P-169, and potentially to the testimony of each of the [REDACTED] witnesses called from [REDACTED]. Mindful of the "exceptional" nature of recall, particularly after the close of the evidence, the Defence submits that good cause exists warranting his return to The Hague.

14. The Chamber ordered the recall of P-169 on the basis of "[REDACTED]."³⁹ The Chamber has now heard evidence that, in fact, P-178 was at the [REDACTED]. P-178 was "[REDACTED]".⁴⁰ The following testimony is worth noting:⁴¹

[REDACTED]

³¹ CAR-OTP-0083-1303.

³² CAR-OTP-0083-1212.

³³ [REDACTED].

³⁴ [REDACTED].

³⁵ [REDACTED].

³⁶ [REDACTED].

³⁷ See, for example, CAR-OTP-0083-1491.

³⁸ [REDACTED].

³⁹ ICC-01/05-01/08-3154-Conf, para. 29.

⁴⁰ [REDACTED].

⁴¹ [REDACTED].

15. In addition to being the [REDACTED] P-169's letters,⁴² P-178 was also identified as [REDACTED].⁴³ [REDACTED].⁴⁴ [REDACTED],⁴⁵ [REDACTED].⁴⁶ [REDACTED], and is [REDACTED] to explain to the Chamber the level of contact and/or collusion between them as they coordinated their efforts to receive more money as a result of their testimony. The need to elicit further details is plain:⁴⁷

[REDACTED]

(b) Recall as a remedy for late disclosure

16. On 22 October 2014, following an order from the Chamber, the Prosecution disclosed 324 documents to the Defence which detail payments made to Prosecution witnesses, and records of contacts between the Prosecution and witnesses concerning payments. As noted above, the Defence had first asked for disclosure of these documents in November 2013.⁴⁸

17. No possible argument can be made that these documents were not disclosable,⁴⁹ given that they detail not only demands from witnesses for payments from the Prosecution,⁵⁰ contact between Prosecution witnesses concerning payments from the Prosecution,⁵¹ and [REDACTED].⁵²

18. [REDACTED].

⁴² [REDACTED].

⁴³ [REDACTED].

⁴⁴ [REDACTED].

⁴⁵ CAR-OTP-0083-1494_R01 at 1495.

⁴⁶ [REDACTED].

⁴⁷ [REDACTED].

⁴⁸ ICC-01/05-01/08-2872-Conf, para. 50.

⁴⁹ ICC-01/05-01/08-2845-Conf-Red, para. 9.

⁵⁰ CAR-OTP-0083-1494_R01.

⁵¹ CAR-OTP-0083-1489_R01.

⁵² ICC-01/05-01/08-3160-Conf-AnxB-Red.

19. For the present purposes, however, the disclosure indicates that, for example, P-178 was in regular contact with the Prosecution, repeating his demand for payment, and informing the Prosecution of [REDACTED]. For example:

- [REDACTED]⁵³, [REDACTED].⁵⁴
- [REDACTED],⁵⁵ [REDACTED].”⁵⁶
- [REDACTED]⁵⁷ [REDACTED].⁵⁸
- [REDACTED].⁵⁹

20. It is worth noting that these materials were in the possession of the Prosecution at the time that they told the Chamber that:⁶⁰

[REDACTED].

21. This information was disclosable at the time it was created. Issues concerning the monetary claims of P-169 and P-178 have been litigated in front of the Chamber for almost a year. The non-disclosure of this material which, at a minimum, supported Mr. Bemba’s request for recall of P-178 in November 2013, has caused prejudice. Since that time, the evidence has been closed, the parties have filed their Closing Briefs, and Mr. Bemba has spent another year in custody. A common remedy for prosecutorial disclosure violations at the ICTY and ICTR was the recall of the relevant witness, particularly in situations where the relevant material would assist the Defence in its examination of the witness.⁶¹ The Defence submits that

⁵³ CAR-OTP-0083-1489_R01 at 1491.

⁵⁴ CAR-OTP-0083-1489_R01 at 1490.

⁵⁵ [REDACTED].

⁵⁶ CAR-OTP-0083-1489_R01 at 1490.

⁵⁷ [REDACTED].

⁵⁸ CAR-OTP-0083-1489_R01 at 1490.

⁵⁹ CAR-OTP-0083-1489_R01 at 1491.

⁶⁰ ICC-01/05-01/08-3160-Conf, para. 7.

⁶¹ See, for example, *Prosecutor v Orić*, IT-03-68-T, Decision on Urgent Defence Motion Regarding Prosecutorial Non-Compliance With Rule 68, 27 October 2005; *Prosecutor v Stanišić & Simatović*, IT-03-69-T, Decision on *Stanišić* Motion Requesting the Recall of Manoljo Milovanović, 22 November 2011, at paras. 9-10; *Prosecutor v Karadžić*, IT-95-5/18-T, Decision on Accused’s Motion to Recall Twelve Municipalities Witnesses, 20 January 2012, at para. 11; *Prosecutor v Zigiranyirazo*, ICTR-2001-73-T, Decision on Prosecutor Ex Parte Confidential Application et al, 10 October 2005; *Prosecutor v*

should the Trial Chamber still intend to consider P-178's testimony during its deliberations, the recall of the witness is an appropriate remedy for prejudice caused by the failure of the Prosecution to provide these disclosable materials to the Defence. Recall would allow the Defence to explore the motivation behind P-178's testimony, and the basis for his insistence that he has a "right" to more money from the Court.

(c) Recall on the basis that P-178 is the [REDACTED] the List

22. P-178 is the key to the List. As noted above, the case is rapidly drawing to a close without any answers as to how a complete list of protected Prosecution witnesses [REDACTED] was compiled. P-178 is in a position to provide the Chamber and the parties with answers. This is an opportunity which should be seized.

23. The case for P-178's recall finds further support in the apparent lack of investigation or resultant action taken by the Prosecution into this breach of the Chamber's orders. This has not escaped Chamber's notice, with the Prosecution being asked during the 23 September Status Conference as to "[REDACTED]"⁶² The Senior Trial Attorney responded that:

[REDACTED].

24. The Chamber has a means of forcing P-178 to answer this question: recall for further testimony under oath.

(d) Recall on the basis of P-178's relationship with "[REDACTED]"

Nyiramasuhuko et al, No. ICTR-98-42-T, Decision on Elie Ndayambaje's and Alphonse Nteziryayo's Request for the Recall of Witness FAG Following the Disclosure of a New Confessional Statement, 18 June 2004.

⁶² T-360-CONF-ENG ET, p.26, lines 8-11.

25. An added bonus from the recall of P-178 would be the opportunity to question him about “[REDACTED]”, an individual whose misconduct and interference in the present proceedings dates back many years.

26. As the Chamber is aware, “[REDACTED] facilitated false claims on the part of participating victims in the *Bemba* case. Holding himself out as coming from the ICC,⁶³ his role in the falsification of victims’ application forms was not limited to encouraging alleged victims to exaggerate claims for lost property or harm suffered. The Chamber heard testimony that he instructed a Prosecution witness to falsely claim that his daughter had been raped, in order to be in a better position to claim reparations from the Court.⁶⁴

27. Following this revelation, the Chamber ordered that 70 applications completed by “[REDACTED]” be reviewed by the VPRS,⁶⁵ and that the 160 individuals who had already been authorised to participate in the proceedings by previous Chamber’s decisions be contacted by the Legal Representatives of Victims to check the accuracy of information provided in their application forms.⁶⁶ This was not a small undertaking.

28. Years later, it appears that “[REDACTED]” continues to meddle in the conduct of the *Bemba* case, appearing at meetings between Prosecution witnesses where they attempt to coordinate further attempts to get money from the ICC.⁶⁷ Given the evidence before the Chamber of [REDACTED]’s familiarity with the proceedings, the victims, and at least some of the Prosecution witnesses, it cannot be discounted that he has played a role [REDACTED] of the List, and in the pressure being put on the Court by Prosecution witnesses.

⁶³ P-73, T-73-Conf-ENG-ET, p.21, lines 10-12; p.22, lines 11-12; p.28, lines 2-5.

⁶⁴ P-73, T-76-Conf-ENG-ET p.9, lines 17-18.

⁶⁵ ICC-01/05-01/08-1593-Conf, para. 33.

⁶⁶ ICC-01/05-01/08-1593-Conf, para. 36.

⁶⁷ [REDACTED]

29. P-178 knows [REDACTED] well:⁶⁸

[REDACTED].

30. P-178's recall would accordingly provide the Chamber and the parties with an opportunity to explore the extent of [REDACTED]'s involvement in the contact between Prosecution witnesses, the [REDACTED] of the List, and to shed light on the steadfast belief of P-169 and P-178 that it was their "right"⁶⁹ to receive money from the ICC as a result of their testimony; a critical question in the assessment of the credibility of these two key Prosecution witnesses.

(e) Recall to explore the veracity of P-178's claimed "threats"

31. Providing further support for P-178's recall are his claims of threats on the part of anonymous callers, whom he associates with the [REDACTED].⁷⁰ P-178 has gone as far as to claim anxiety on the basis that [REDACTED].⁷¹ These reports of threats prompted filings before the Chamber; contact between the Prosecution and the [REDACTED]; [REDACTED], and the preparation of a number of Registry reports.⁷²

32. Like P-178, P-169 had also made similar claims against individuals associated with the MLC.⁷³ During his recall, however, he withdrew from his previous allegations of threats against him. Having claimed in July 2011 that he had received threatening phone calls from [REDACTED],⁷⁴ for example, P-169 then testified that:⁷⁵

⁶⁸ [REDACTED]

⁶⁹ CAR-OTP-0083-1489_R01 at 1491.

⁷⁰ ICC-01/05-01/08-1623-Conf-Red, paras. 6-9.

⁷¹ ICC-01/05-01/08-1623-Conf-Red, para. 6.

⁷² ICC-01/05-01/08-1623-Conf-Red, para. 10; ICC-01/05-01/08-1816-Conf-Anx1-Red2.

⁷³ ICC-01/05-01/08-1623-Conf-Red, paras. 3-5.

⁷⁴ ICC-01/05-01/08-1816-Conf-Anx1-Red2, p.5.

⁷⁵ ICC-01/05-01/08-T-361-CONF-ENG ET, p.11, lines 12-13.

[REDACTED].

33. A basis therefore exists for the Chamber and parties to explore whether the threats reported by P-178 are of the same caliber as those reported by P-169, particularly given the contemporaneous manner of their reporting,⁷⁶ the level of contact between these two witnesses,⁷⁷ and their repeated insistence that the Court would pay them the money they were owed.⁷⁸ If P-178 also withdraws from his previous allegations concerning threats against him, this is directly relevant to his credibility generally, and further evidence of his willingness to give false information in the hope of receiving further benefits from the Court. The Defence is entitled to explore such issues.

(f) Recall as a further check on the general credibility of P-169

34. Since the principal philosophy behind the recall of P-169 was to examine how the letters he had written impacted upon his credibility as a witness in the trial itself, it would be illogical not to recall P-178, upon whom [REDACTED] now that the opportunity presents itself.

35. P-169's account of his receipt and custody of the list is highly questionable in any event, especially given that the only copies ever received in fact [REDACTED] in apparently electronic format, and that those copies of the document were in significantly different forms. It was, of course convenient for P-169 to adopt the approach he did, given the "empty chair" in the case at this time. P-178 may of course agree with him, but the Chamber cannot know. On the other hand, he may lay responsibility for [REDACTED] the list firmly at the door of P-169. He may,

⁷⁶ ICC-01/05-01/08-1623-Conf-Red, paras. 3, 9.

⁷⁷ ICC-01/05-01/08-1816-Conf-Anx1-Red2, p.13. [REDACTED]

⁷⁸ CAR-OTP-0083-1489_R01 at 1491: "P-0178 continues to express his anger and insisting that the ICC is going to pay him the money because it was his right". See also ICC-01/05-01/08-1660-Conf-Anx-Red2, p.2; CAR-OTP-0072-0504_R01 at 0505; CAR-OTP-0083-1303; CAR-OTP-0083-1212 at 1213.

moreover, paint an entirely different picture of P-169's involvement in the contacting of other witnesses, attendance at meetings, and acquaintance with [REDACTED].

36. Such evidence would impact devastatingly upon an assessment of P-169's credibility. If accepted, it would necessarily follow that P-169 had lied on oath on material issues before the Chamber. Absent the recall of P-178, the recall of P-169 represents only a partial and unsatisfactory reappraisal of his credibility.

E. CONCLUSION

37. There are too many unknowns which plague this critical aspect of the Prosecution case, namely the motivation behind and contact between such a significant tranche of its witnesses. Simply allowing P-169 to point to an empty chair and transfer all responsibility to P-178 is of little assistance in a genuine search for the truth. Rather than providing all the answers, P-169's testimony raised a significant number of new questions. P-169 and P-178 have enjoyed a remarkable level of contact throughout the period of their association with the ICC; a level of contact which suggests they have worked hand-in-hand to achieve their apparent goals. There is arguably no justification for recalling P-169 and not recalling P-178, particularly given the role ascribed to the latter during the course of P-169's testimony.

38. In the Defence submission, recall would be warranted on any of the five grounds set out above. In combination, good cause exists to recall P-178 to give further testimony before the Chamber. Moreover, there can be no suggestion that, with reasonable diligence, the evidence in question could have been identified and

presented by the Defence prior to the closing of evidence.⁷⁹ Despite the late phase of the proceedings, both the Registry and the parties have demonstrated an ability and willingness to facilitate the appearance of, and complete the testimony of recalled witnesses within a very short period of time. This additional delay is justified given the importance of P-178 to questions raised as to the veracity of the Prosecution's case.

39. Given the stage of the trial, the Defence also asks that the Chamber expedite the Prosecution's timeframe for a response to the present motion. In the Defence submission, P-178's evidence could potentially heard in the week starting 10 November 2014. Although this would necessitate an additional and limited delay to the presentation of Closing Arguments, the Defence submits that any delay would be minimal, and warranted in the present circumstances.

F. REQUESTED RELIEF

40. Given the above, the Defence respectfully requests that the Chamber:

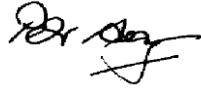
GRANT the Defence request for recall of Prosecution Witness P-178;

ORDER the Prosecution to respond to the present application within an expedited period; and

DELAY the hearing of Closing Arguments until after the completion of P-178's testimony and the filing of limited associated additional submissions.

The whole respectfully submitted.

⁷⁹ ICC-01/05-01/08-3154-Conf, para. 26.



Peter Haynes QC
Counsel for Mr. Jean-Pierre Bemba

The Hague, The Netherlands

4 December 2014