

**Cour
Pénale
Internationale**



**International
Criminal
Court**

Original: **English**

No.: **ICC-02/11-02/11**

Date: **14/08/2014**

PRE-TRIAL CHAMBER I

Before: Judge Silvia Fernández de Gurmendi, Presiding Judge
Judge Ekaterina Trendafilova
Judge Christine Van den Wyngaert

SITUATION IN THE REPUBLIC OF CÔTE D'IVOIRE

IN THE CASE OF THE PROSECUTOR v. CHARLES BLÉ GOUDÉ

**Confidential Document
URGENT**

Defence request for reclassification of filing ICC-02/11-02/11-117

Source: Defence for Charles Blé Goudé

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

The Office of the Prosecutor

Fatou Bensouda

James Stewart

Eric Macdonald

Counsel for the Defence

Nicholas Kaufman

Legal Representatives of the Victims

Legal Representatives of the Applicants

Unrepresented Victims

Unrepresented

Applicants

(Participation/Reparation)

**The Office of Public Counsel for
Victims**

**The Office of Public Counsel for the
Defence**

States' Representatives

Amicus Curiae

REGISTRY

Registrar

Herman von Hebel

Counsel Support Section

Esteban Peralta-Losilla

Deputy Registrar

Victims and Witnesses Unit

Detention Section

Harry Tjonk

**Victims Participation and Reparations
Section Other**

The Defence for Charles Blé Goudé ("the Suspect") hereby requests that the Pre-Trial Chamber immediately reclassify the "*Prosecution's Request for Measures under Regulation 101(2) of the Regulations of the Court*" ("the Prosecutor's Request")¹ as public.

Nothing contained in the Prosecutor's Request is confidential. Every single allegation is made on the basis of material available to the general public through the media.

The conditions pertaining to the visiting rights and internet access for detainees at the ICC detention facility are a matter of public record.

The Prosecution's classification of its application as confidential is, with respect, a bare-faced attempt to disguise the quite extraordinary and unprecedented nature of its draconian request.

The Pre-Trial Chamber is thus requested to reclassify the Prosecution application and this response as public forthwith.

The Defence will file its response in due course.



Nicholas Kaufman
Counsel for Charles Blé Goudé

Done in Jerusalem, Israel
Thursday, August 14, 2014

¹ ICC-02/11-02/11-117.