



Original: **English**

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

Date: **17 June 2015**

**TRIAL CHAMBER VI**

**Before:** Judge Robert Fremr, Presiding Judge  
Judge Kuniko Ozaki  
Judge Chang-ho Chung

**SITUATION IN THE DEMOCRATIC REPUBLIC OF THE CONGO**

**IN THE CASE OF  
*THE PROSECUTOR V. BOSCO NTAGANDA***

**Public**

**Response on behalf of Mr Ntaganda to Confidential Redacted Version of  
“Corrected version of the ‘Prosecution request for in-court protective measures’,  
27 May 2015, ICC-01/04-02/06-609-Conf-Exp”**

**Source:** Defence Team of Mr Bosco Ntaganda

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

**The Office of the Prosecutor**

Ms Fatou Bensouda  
Mr James Stewart  
Ms Nicole Samson

**Counsel for the Defence**

Me Stéphane Bourgon  
Me Luc Boutin

**Legal Representatives of Victims**

Ms Sarah Pellet  
Mr Dmytro Suprun

**Legal Representatives of 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**

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**Registrar**

Mr Herman von Hebel

**Counsel Support Section**

**Victims and Witnesses Unit**

Mr Nigel Verrill

**Detention Section**

**Victims Participation and Reparations  
Section**

Further to the confidential redacted version of “Corrected version of the ‘Prosecution request for in-court protective measures’, 27 May 2015, ICC-01/04-02/06-609-Conf-Exp” submitted by the Office of the Prosecutor (“Prosecution”) on 28 May 2015 (“Prosecution Request”),<sup>1</sup> Counsel representing Mr Ntaganda (“Defence”) hereby submit this:

**Response on behalf of Mr Ntaganda to Confidential Redacted Version of  
“Corrected version of the ‘Prosecution request for in-court protective measures’,  
27 May 2015, ICC-01/04-02/06-609-Conf-Exp”**

**SUBMISSIONS**

1. In light of the clear and unambiguous prescription under Regulation 42(1) of the Regulations of the Court, the Defence does not object to the maintenance of the in-court protective measures (face distortion, voice distortion and use of a pseudonym) for the 11 witnesses listed in the Prosecution Request.
2. However, the Defence wishes to underscore the fact that it is not in a position to make any meaningful and useful comments as to whether ongoing protective measures for the 11 listed witnesses still remain necessary at this time since the Defence is not aware of the specific security needs for these witnesses.

**RELIEF SOUGHT**

In light of the above submissions, the Defence does not object to the Prosecution Request.

**RESPECTFULLY SUBMITTED ON THIS 17<sup>TH</sup> DAY OF JUNE 2015**



Me Stéphane Bourgon, Counsel for Bosco Ntaganda  
The Hague, The Netherlands

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<sup>1</sup> ICC-01/04-02/06-609-Conf-Corr-Red. A Public Redacted Version was filed by the Prosecution on 5 June 2015: ICC-01/04-02/06-609-Corr-Red2.