

**Cour
Pénale
Internationale**



**International
Criminal
Court**

Original: English

No.: ICC-01/05-01/08

Date: 15 April 2016

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 Document
with
Confidential Annexes 1 to 8**

**Prosecution's Submission of Additional Information regarding its Proposed
Expert Witness**

Source: The Office of the Prosecutor

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

The Office of the Prosecutor

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I. Introduction

1. In accordance with the Trial Chamber III ("Chamber")'s order,¹ the Office of the Prosecutor ("Prosecution") hereby identifies Dr Daryn Reicherter as its proposed expert to present additional evidence at the sentencing phase, pursuant to article 76(2) of the Rome Statute, "on the longitudinal and intergenerational impact of crimes such as (mass) rape and sexual violence, on the mental health of individual victims, their families, and the affected population."²

II. Submissions

2. On 17 November 2015, the Prosecution submitted a letter of mandate and list of materials to Dr Reicherter.³ On 14 April 2016, Dr Reicherter submitted his expert report with five annexes. These documents are attached as Annexes 1 to 8 of this filing.⁴ The expert report addresses the extent of the harm and damage caused to direct and indirect victims of traumatic experiences, such as rape, from an interdisciplinary scientific perspective that demonstrates a broader range of mental health outcomes and their longitudinal and intergenerational impact.

3. As detailed in his *curriculum vitae* ("CV"),⁵ Dr Reicherter is a certified psychiatrist with considerable national and international expertise in cross-cultural trauma of survivors of mass atrocities and human rights abuses, such as rape and torture. Furthermore, he is a Clinical Associate Professor at Stanford University's

¹ ICC-01/05-01/08-3365, Decision on "Defence request for disclosure and/or clarification of the timeline for Sentencing Requests", 13 April 2016, para. 10(i).

² ICC-01/05-01/08-3362, Prosecution's Application to Submit Additional Evidence and Present Final Oral Submissions on Sentencing, 11 April 2016, para. 4.

³ See, letter of mandate (CAR-OTP-0094-0485) and list of materials (CAR-OTP-0094-0488).

⁴ The expert report is CAR-OTP-0094-0493; and the annexes are CAR-OTP-0094-0541, CAR-OTP-0094-0552, CAR-OTP-0094-0560, CAR-OTP-0094-0564, and CAR-OTP-0094-0568.

⁵ CAR-OTP-0094-0541, which is attached to this submission as Annex 4.

Department of Psychiatry and Behavioral Sciences and Director of the Program for Human Rights in Trauma Mental Health.

III. Request for Confidentiality

4. Pursuant to regulation 23(1)*bis* of the Regulations of the Court, the Prosecution requests that Annexes 1 to 8 of this document be received by the Chamber as “Confidential” as they contain confidential information that should not be disclosed to the public.

IV. Relief Sought

5. The Prosecution respectfully reiterates its request for the Chamber to grant its application to call expert testimony as additional evidence for the sentencing phase.⁶



Fatou Bensouda, Prosecutor

Dated this 15th Day of April 2016
At The Hague, The Netherlands

⁶ ICC-01/05-01/08-3362, para. 13.