

**Cour  
Pénale  
Internationale**



**International  
Criminal  
Court**

Original: English

No.: ICC-01/04-02/06  
Date: 15 November 2016

**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***

**Confidential**

**Joint Response by the Common Legal Representative for the Victims of the  
Attacks and the Common Legal Representative for the Former Child Soldiers to  
the Defence “Urgent Request for Stay of Proceedings”**

**Source:** Office of Public Counsel for Victims

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**

Mr Stéphane Bourgon  
Mr Christopher Gosnell

**Legal Representatives of the Victims**

Ms Sarah Pellet  
Mr Mohamed Abdou

**Legal Representatives of the Applicants**

Mr Dmytro Suprun  
Ms Anne Grabowski

**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**

Mr Herman von Hebel

**Counsel Support Section**

**Victims and Witnesses Unit**

**Detention Section**

**Victims Participation and Reparations  
Section**

**Other**

## I. INTRODUCTION

1. The Common Legal Representative for the Victims of the Attacks and the Common Legal Representative for the Former Child Soldiers (the “Legal Representatives”) hereby submit their joint response to the Defence “Urgent Request for Stay of Proceedings”, filed with a view to obtaining an expedited ruling thereon on 14 November 2016 (the “Defence Request” or “Request”).<sup>1</sup> In its Request, the Defence seeks an immediate suspension of the proceedings until disclosure of material related to the “Prosecution’s Communication of the Disclosure of Evidence obtained pursuant to Article 70”<sup>2</sup> notice (the “Notice”) has taken place.<sup>3</sup>

2. The Legal Representatives oppose the Defence Request and respectfully request that the Chamber reject the relief sought.

3. Entitling its Request as one for a “stay” of proceedings inappropriately reflects the subject-matter of the Request and the nature of the relief sought. Nowhere in its substantive Request does the Defence specifically request a *stay* of proceedings – a term defined by the jurisprudence of this Court or the jurisprudence of the International Criminal Tribunals for the Former Yugoslavia and Rwanda to which it cites.<sup>4</sup> In fact, the Defence Request is rather one for an adjournment.<sup>5</sup>

4. Nevertheless, as the Defence has chosen to characterise its submissions as a Request for the stay of proceedings, the Legal Representatives will briefly address the applicable law in this regard, before concluding their submissions with observations on the actual request for an adjournment.

---

<sup>1</sup> See the “Urgent Request for Stay of Proceedings”, No. ICC-01/04-02/06-1629, 14 November 2016 (the “Defence Request”). A public redacted version of the Request was filed on the same day. See the “Public redacted version of ‘Urgent Request for stay of Proceedings’”, No. ICC-01/04-02/06-1629-Red, 14 November 2016.

<sup>2</sup> See the “Prosecution’s Communication of Disclosure of Evidence obtained pursuant to Article 70”, No. ICC-01/04-02/06-1616, 7 November 2016 (the “Notice”).

<sup>3</sup> See the Defence Request, *supra* note 1, paras. 1 and 28.

<sup>4</sup> *Idem*, paras. 8 and 18.

<sup>5</sup> *Ibid.*, paras. 1, 10 and 18. The word “stay” of proceedings is merely used in the title and first heading of the Request.

5. The Defence Request for a stay of proceedings should be dismissed as it does not fulfil the underlying requirements for such remedy set out in the jurisprudence of the Court. Ordering a stay of proceedings is an exceptional and drastic<sup>6</sup> remedy of last resort.<sup>7</sup> The Defence does not demonstrate that such a measure is warranted in the circumstances. In particular, the Defence fails to establish how article 70 materials specifically affect the cross-examination of the witnesses scheduled to testify in the present evidentiary block and, moreover, fails to substantiate a concrete and specific prejudice that would result in the impossibility to conduct a fair trial, if it were required to proceed with the cross-examination of the upcoming scheduled witnesses in parallel to obtaining disclosure of material relating to the Prosecution's Notice.

## II. PROCEDURAL BACKGROUND

6. On 7 November 2016, the Prosecution publicly filed its Notice.<sup>8</sup>

7. At 9:26 on 14 November 2016, the Defence submitted a courtesy copy of its Request.<sup>9</sup> Defence counsel then proceeded to orally address the Chamber on the interim relief sought arising from its Request.<sup>10</sup> In its oral submissions, the Defence requested an "immediate suspension of the proceedings"<sup>11</sup> and in particular, that the examination of the upcoming Prosecution witness, Witness P-0911, be postponed until adjudication of the Request.<sup>12</sup>

---

<sup>6</sup> See e.g. the "Decision on Defence Application for a permanent stay of the proceedings due to abuse of process" (Trial Chamber V(B)), No. ICC-01/09-02/11-868-Red, 5 December 2013 (the "*Kenyatta* Decision"), para. 14.

<sup>7</sup> *Idem*, para. 99.

<sup>8</sup> See the Notice, *supra* note 2

<sup>9</sup> See Email correspondence from the Defence to the Chamber, Prosecution and Participants dated 14 November 2016 at 9:26.

<sup>10</sup> See transcript of the hearing of 14 November 2016, No. ICC-01/04-02/06-T-157-ENG-RT, p. 3, line 3 to p. 4, line 22.

<sup>11</sup> *Idem*, p. 3, lines 10-11.

<sup>12</sup> *Ibid.*, p. 3, line 3 to p. 4, line 22. The Defence did, however, indicate that it was willing to continue with the cross-examination of Prosecution Witness P-0918 who had already begun her testimony. See *ibid.*, p. 4, lines 11-18.

8. The Prosecution, the Legal Representatives, and the Legal Adviser appointed to assist Witness P-0911 made brief submissions on the interim relief sought.<sup>13</sup> Both the Legal Representative for the Victims of the Attacks<sup>14</sup> and the Prosecution requested to be given the opportunity to respond to the Defence Request in writing.<sup>15</sup> The Legal Adviser expressed that he was not in a position to make any specific submissions on the request, other than to confirm P-0911's availability to immediately commence his testimony.<sup>16</sup> The Legal Representative for the Former Child Soldiers opposed the interim request, arguing that the Chamber should proceed with hearing the evidence of the upcoming witnesses..<sup>17</sup>

9. After deliberation, the Chamber ruled that the examination-in-chief of P-0911 should proceed.<sup>18</sup> It stated that it had specifically considered that *"prejudice to the Defence would mainly arise in respect of potential cross-examination of this witness."*<sup>19</sup> The Chamber further directed the Prosecution and Legal Representatives to file their respective responses to the Defence Request by 16:00 on 15 November 2016.<sup>20</sup>

10. The Defence Request was formally filed later on 14 November 2016.<sup>21</sup> Later on the same day, the Defence notified the Chamber, Prosecution, and Legal Representatives that it had for the first time gained access to audio files referred to in the Prosecution's Notice after midday.<sup>22</sup>

---

<sup>13</sup> *Ibid.*, pp 5-10.

<sup>14</sup> *Ibid.*, p. 7, lines 6-7.

<sup>15</sup> *Ibid.*, p. 5, lines 7-8.

<sup>16</sup> *Ibid.*, p. 7, lines 21-22.

<sup>17</sup> *Ibid.*, p. 6, lines 15-23.

<sup>18</sup> *Ibid.*, p. 9, lines 24-25. The Presiding Judge further clarified that it *"will have first to evaluate the response from prosecution and participants to [the Defence] submission. And very likely also to -- but then probably only orally to hear [the Defence] reply to the response. So I guess that before, before that we can't start with cross-examination. But one of the [sic] option is that it would mean that there is still some possibility we would start cross-examination not [Tuesday, 15 November 2016], but on Wednesday."* See *Ibid.*, p. 35, lines 1-8.

<sup>19</sup> *Ibid.*, p. 10, lines 3-4.

<sup>20</sup> *Ibid.*, p. 10, lines 5-7.

<sup>21</sup> See the Defence Request, *supra* note 1.

<sup>22</sup> See the Email correspondence from the Defence to the Chamber, Prosecution, and Participants sent on 14 November at 14:24.

### III. SUBMISSIONS

11. The Defence submits that the Prosecution's past and continued non-disclosure caused on-going prejudice to the Defence and that immediate suspension of proceedings until the information prescribed in the Prosecution Notice has been disclosed was necessary.<sup>23</sup> It avers that the suspension and immediate disclosure are required so as to put the Defence into a position to make informed submissions to the Trial Chamber concerning the impact of both the investigation and the non-disclosure on the fairness of the proceedings.<sup>24</sup> The Defence further requests to be provided with more information about the Article 70 investigation.<sup>25</sup>

12. The Defence argues that the material in question, as acknowledged by the Prosecution,<sup>26</sup> is subject to disclosure pursuant to Rule 77 of the Rules of Procedure and Evidence (the "Rules").<sup>27</sup> It avers that it was not informed of the existence of this information until 7 November 2016; had not received it by the time of the filing of its Request; and had not received any indication that the Trial Chamber had previously authorised the non-disclosure of the information pursuant to Rule 81(2) of the Rules.<sup>28</sup>

13. The Defence contends that the non-disclosure of the information in question impacts not only on the selection of its witnesses and the preparation and presentation of its case, but also that it "*substantially affects the conduct of cross-examination of Prosecution witnesses.*"<sup>29</sup> It submits that "*no more witnesses should be heard until the [...] disclosure is completed and the Defence has had a reasonable opportunity to make appropriate submissions.*"<sup>30</sup>

---

<sup>23</sup> See the Defence Request, *supra* note 1, para. 1. Emphasis added.

<sup>24</sup> *Idem.*

<sup>25</sup> *Ibid.*

<sup>26</sup> See the Notice, *supra* note 2, para. 3.

<sup>27</sup> See the Defence Request, *supra* note 1, para. 2.

<sup>28</sup> *Idem.*

<sup>29</sup> *Ibid.*

<sup>30</sup> *Ibid.*, para. 4.

14. As set out above, the Legal Representatives observe that the Defence Request interchangeably employs the terms 'suspension of proceedings' and 'stay of proceedings'.<sup>31</sup> It is submitted in this regard that the two are quite dissimilar concepts; the former effectively seeking an adjournment, whereas the latter aims at a termination of the proceedings due to serious infringements, such as an abuse of process.<sup>32</sup> In respect of the latter, the jurisprudence of the Court acknowledges that *"the stay of the proceedings is the necessary remedy only if (i) the 'essential preconditions for a fair trial are missing', and (ii) there is 'no sufficient indication that this will be resolved during the trial process'."*<sup>33</sup>

15. Nevertheless, the Defence having characterised its Request as one for a stay of proceedings, the Request should be assessed against the applicable criteria as set out by the jurisprudence of this Court.

16. In accordance with the jurisprudence of the Court, Chambers of the Court have the inherent power to order a stay of proceedings.<sup>34</sup> In assessing whether the requirements are met, trial chambers enjoy a margin of appreciation based on their intimate understanding of the process.<sup>35</sup> According to the Appeals Chamber, "[t]he power to stay proceedings is par excellence a power assumed by the guardians of the judicial

---

<sup>31</sup> In paragraph 10 of its Request, the Defence even refers to an *"immediate adjournment of the proceedings"*. See the Defence Request, *supra* note 1, para. 10.

<sup>32</sup> Trial Chamber V(B) has previously acknowledged a distinction between a permanent stay and a conditional stay of proceedings. However, it only set out the law applicable to a permanent stay of proceedings given that the application before it made no mention of an alternative request for a conditional stay. See the *Kenyatta* Decision, *supra* note 6, para. 13.

<sup>33</sup> See the "Decision on the defence request for a temporary stay of proceedings" (Trial Chamber IV), No. ICC-02/05-03/09-410, 26 October 2012 (the *"Banda and Jerbo Decision"*), para. 79 referring to "Judgment on the appeal of the Prosecutor against the decision of Trial Chamber I entitled 'Decision on the consequences of non-disclosure of exculpatory materials covered by Article 54(3)(e) agreements and the application to stay the prosecution of the accused, together with certain other issues raised at the Status Conference on 10 June 2008'" (Appeals Chamber), No. ICC-01/04-01/06-1486, 21 October 2008 (the *"Lubanga 2008 Judgment"*), para. 76.

<sup>34</sup> See the "Decision on Defence request for stay of proceedings and further disclosure", ICC-01/05-01/08-3335 (Trial Chamber III), 7 March 2016 (the *"Bemba 2016 Decision"*), para. 17; "Decision on 'Defence Request for Relief for Abuse of Process'" (Trial Chamber III), No. ICC-01/05-01/08-3255 (the *"Bemba 2015 Decision"*), para 8; *Banda and Jerbo* Decision, *supra* note 33, para. 74.

<sup>35</sup> *Idem*.

process, the judges, to see that the stream of justice flows unpolluted.”<sup>36</sup> It is a drastic measure which is subject to a high threshold.<sup>37</sup> In order to meet this threshold, it must be demonstrated that it would be “impossible to piece together the constituent elements of a fair trial”.<sup>38</sup> As Trial Chamber III, for instance, recently recalled, a stay of proceedings is only justified where the situation is such that it would be ‘repugnant’ or ‘odious’ to the administration of justice to allow the case to continue.<sup>39</sup>

17. Essentially, a trial chamber may impose a stay of the proceedings where the moving party can show that (i) the rights of the accused have been violated to such an extent that the essential preconditions of a fair trial are missing and (b) there is no sufficient indication that this will be resolved during the trial process.<sup>40</sup> However, as acknowledged by Trial Chamber V(B), to conceive of a stay of proceedings as an appropriate remedy for any difficulties encountered in accessing information or facilities during trial preparation would run contrary to the responsibility of trial judges to relieve unfairness as part of the trial process.<sup>41</sup>

*a. The Defence fails to Demonstrate that a Stay of the Proceedings is Warranted*

18. The Legal Representatives submit that the Defence fails to substantiate any prejudice that specifically relates to proceeding with the examination of witnesses scheduled to testify in the current, seventh evidentiary block. It merely seeks a break or adjournment in the proceedings that would allow it time to prepare submissions

---

<sup>36</sup> See the “Judgment on the Appeal of Mr. Thomas Lubanga Dyilo against the Decision on the Defence Challenge to the Jurisdiction of the Court pursuant to article 19 (2) (a) of the Statute of 3 October 2006” (Appeals Chamber), No. ICC-01/04-01/06-772, 14 December 2006 (the “Lubanga 2006 Judgment”), para. 28.

<sup>37</sup> See the “Judgment on the Appeal of the Prosecutor against the decision of Trial Chamber I of 8 July 2010 entitled ‘Decision on the Prosecution’s Urgent Request for Variation of the Time-Limit to Disclose the Identity of Intermediary 143 or Alternatively to Stay Proceedings Pending Further Consultations with the VWU’” (Appeals Chamber), No. ICC-01/04-01/06-2582, 8 October 2010 (the “Lubanga 2010 Judgment”), para. 55.

<sup>38</sup> *Idem*.

<sup>39</sup> See the *Bemba* 2016 Decision, *supra* note 34, para. 17. See also the *Lubanga* 2010 Judgment, *supra* note 37, para. 55.

<sup>40</sup> See the *Kenyatta* Decision, *supra* note 6, para. 14.

<sup>41</sup> *Idem*.



relating to the possible impact of the article 70 material on its own preparations, witnesses, strategy and case at a *future* point in time. As such, the Defence fails to demonstrate how a temporary stay in the proceedings is the *only* available remedy. It is submitted that any issues arising from the disclosable material may be dealt with in parallel,<sup>42</sup> and the fact that other measures are available to counter any possible or potential prejudice, clearly indicates that the case at hand does not call for a *measure of last resort*.

19. Moreover, the Defence's assertions that it is "very likely suffering ongoing prejudice", that "is not yet in a position to offer submissions as to the nature and extent of the prejudice to the fairness of these proceedings"<sup>43</sup>, and that "there is a possibility that no remedy will counter-act the prejudice that has already been caused to the fairness of these proceedings"<sup>44</sup> further demonstrates that its Request is, at the very minimum, premature.<sup>45</sup> In fact, at this stage, the assertions of possible prejudice are necessarily speculative, because the Defence was not yet in possession of the material at the time of filing its Request. As pointed out by Trial Chamber IV in the *Banda and Jerbo* case, allegations need to be specific as opposed to vague speculations.<sup>46</sup>

20. Moreover, whether or not the material should have been disclosed to the Defence at a much earlier stage, and whether or not the Prosecution violated its disclosure obligations by failing or not to apply for an authorisation not to disclose certain material pursuant to Rule 81(2)<sup>47</sup> is not, as such, the crucial consideration for adjudicating a request for a stay of proceedings. Rather, the Defence must show that the rights of the accused have been violated to such an extent that the essential preconditions of a fair trial are missing, and that there is no sufficient indication that this will be resolved during the trial process.<sup>48</sup> This threshold is not met in the case at

---

<sup>42</sup> See e.g. the *Kenyatta* Decision, *supra* note 6, para. 101.

<sup>43</sup> See the Defence Request, *supra* note 1, para. 11.

<sup>44</sup> *Idem*, para. 22.

<sup>45</sup> *Ibid.*, para. 4.

<sup>46</sup> See the *Banda and Jerbo* Decision, *supra* note 6, para. 95.

<sup>47</sup> See the argument set forth in the Defence Request at paragraphs 5-7.

<sup>48</sup> See the *Kenyatta* Decision, *supra* note 33, para. 14(ii).

hand. As referred to above, an array of other remedies is available to the Trial Chamber to counter any potential, possible, or actual prejudice caused to the Defence. Nor, would any disclosure violation in this regard – if there were found to be any – constitute such an egregious and irremediable breach of the accused's fair trial rights as to warrant a stay of proceedings.

*b. The stay of the proceedings is prejudicial to the interests of Justice and to the rights of victims*

21. Given that “a stay of proceedings is not explicitly provided for in the legal framework of the Court”, it is with the responsibility of a relevant Chamber to “remedy breaches of the process in the interest of justice.”<sup>49</sup> It is therefore for “a Trial Chamber, using the tools available within the trial process itself, to cure the underlying obstacles to a fair trial, thereby allowing the trial to proceed speedily to a conclusion on its merits. Doing so, rather than resorting to the significantly more drastic remedy of a stay of proceedings, is in the interests, not only of the victims and of the international community as a whole who wish to see justice done, but also of the accused, who is potentially left in limbo, awaiting a decision on the merits of the case against him by the International Criminal Court.”<sup>50</sup> Moreover, the “fair trial” guarantees shall apply throughout the proceedings and in respect to all the parties and participants, including victims.<sup>51</sup> In the same vein, the requirements of the integrity of the proceedings shall apply to all the parties and the participants in the proceedings before the Court, and not only to the suspect/accused.<sup>52</sup> In this

---

<sup>49</sup> See the *Banda and Jerbo* Decision, *supra* note 33, para. 60. See also the *Lubanga* 2006 Judgment, *supra* note 36, para. 24.

<sup>50</sup> See the *Lubanga* 2010 Judgment, *supra* note 37, para. 60.

<sup>51</sup> In this regard, the Declaration of Basic Principles of Justice for Victims of Crimes and Abuse of Power adopted by the UN General Assembly on 29 November 1985 calls for enabling victims to access to Justice and to obtain redress and for providing them with fair treatment in this regard. See the Declaration of Basic Principles of Justice for Victims of Crimes and Abuse of Power adopted by the UN General Assembly on its 96th plenary meeting, UN Doc. A/RES/40/34, 29 November 1985, Principles 4 to 7. The document is available at the following address: <http://www.un.org/documents/ga/res/40/a40r034.htm>.

<sup>52</sup> See the “Decision on the admission of material from the ‘bar table’” (Trial Chamber I), No. ICC-01/04-01/06-1981, 24 June 2009, para. 42. See also in the same sense TRAPP (K.), *Excluding Evidence: The Timing of a Remedy*, non-published manuscript (1998), Faculty of Law, McGill University, Canada, p. 21; quoted in TRIFFTERER (O.), *Commentary on the Rome Statute of the International Criminal Court* –

regard, the general approach of the European Court of Human Rights (the “ECtHR”) in the evaluation of complaints of violation of fair trial rights under article 6(1) of the European Convention on Human Rights should also be considered.<sup>53</sup>

22. It is submitted that the victims in the present case have been waiting for justice since 2003. Any stay or suspension of the proceedings would gravely affect their interests in the truth and justice without delay; especially when a request for stay of proceedings is based on the Defence’s speculations rather than concrete evidence and facts.<sup>54</sup>

*c. No adjournment of the proceedings is warranted*

23. The Legal Representatives oppose any adjournment to the proceedings, as the Defence has failed to substantiate why it is unable to effectively proceed with the cross-examination of the up-coming witnesses. In this regard, the Defence has not sufficiently substantiated how the foreseen areas of cross-examination of these particular witnesses could potentially be affected by the disclosure of the article 70 material.

24. The material has the potential of affecting the credibility of prospective defence witnesses,<sup>55</sup> not current or upcoming Prosecution witnesses. That it *may* also

---

*Observer’s Notes, Article by Article*, Verlag C.H Beck, Munich, 2008, p. 1335, footnote 139. See also the “DECISION ON THE PROSECUTION’S APPLICATION FOR LEAVE TO APPEAL THE CHAMBER’S DECISION OF 17 JANUARY 2006 ON THE APPLICATIONS FOR PARTICIPATION IN THE PROCEEDINGS OF VPRS 1, VPRS 2, VPRS 3, VPRS 4, VPRS 5 AND VPRS 6” (Pre-Trial Chamber I), No. ICC-01/04-135-tEN, 20 April 2006 (dated 31 March 2006), para. 38.

<sup>53</sup> As recently restated by the Grand Chamber: “[T]he Court’s primary concern under Article 6(1) is to evaluate the overall fairness of the criminal proceedings. [...] In making this assessment the Court will look at the proceedings as a whole having regard to the rights of the defence but also to the interests of the public and the victims that crime is properly prosecuted [...] and, where necessary, to the rights of witnesses [...]. In doing so, the Court will have ‘regard to such factors as the way in which statutory safeguards have been applied, the extent to which procedural opportunities were afforded to the defence to counter handicaps that it laboured under and the manner in which the proceedings as a whole have been conducted by the trial judge’.” See ECtHR, *Al-Khawaja and Tahery v. UK*, Applications Nos. 26766/05 and 22228/06, 15 December 2011, paras. 118 and 144.

<sup>54</sup> See *supra* paras. 18-20.

<sup>55</sup> See the Notice, *supra* note 2, para 2; the Defence Request, *supra* note 1, paras. 2 and 5.

affect the conduct of cross-examination of Prosecution witnesses,<sup>56</sup> is not sufficient to warrant an adjournment until the beginning of next evidentiary block as requested by the Defence.<sup>57</sup> In fact, the actual prejudice – if any – as acknowledged by the Defence, would only arise in case of those witnesses whom the Defence intends to call. Until such time, many avenues can be explored to remedy the potential prejudice and the Defence would have had sufficient time to review the disclosed material.

25. The Defence has until 16 December 2016 to notify the Chamber, Prosecution and Legal Representatives of its intention to call evidence. This deadline was known to the Defence since 19 October 2016.<sup>58</sup> It should be noted that it does not have to provide a full list of its witnesses by this time, but rather a preliminary list which is to be filed on an *ex parte* basis available to the Chamber only.<sup>59</sup>

#### IV. CONFIDENTIALITY

26. Pursuant to regulations 23*bis*(1) and (2) of the Regulations of the Court, the present submissions are classified as “confidential” as they refer to documents filed with the same classification. A public redacted version of the present response will be filed in due course.

---

<sup>56</sup> Defence Request, *supra* note 1, para. 5.

<sup>57</sup> *Idem*, para. 28.

<sup>58</sup> See the “Order setting certain deadlines related to the end of the presentation of evidence by the Prosecution” (Trial Chamber VI), No. ICC-01/04-02/06-1588, 19 October 2016, para. 10.

<sup>59</sup> *Idem*, paras. 11.

**FOR THE FOREGOING REASONS** the Legal Representatives respectfully request that the Chamber dismiss the Defence Request for Stay of Proceedings by rejecting the relief sought.



Dmytro Suprun  
Common Legal Representative for the  
the Victims of the Attacks



Sarah Pellet  
Common Legal Representative for  
Former Child soldiers

Dated this 15<sup>th</sup> Day of November 2016

At The Hague, The Netherlands