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No.: ICC-01/04-01/07
Date: 26 February 2018

THE APPEALS CHAMBER

Before: Judge Howard Morrison, Presiding Judge
Judge Silvia Fernández de Gurmendi
Judge Sanji Mmasenono Monageng
Judge Christine Van den Wyngaert
Judge Piotr Hofmański

SITUATION IN THE DEMOCRATIC REPUBLIC OF THE CONGO

**IN THE CASE OF
*THE PROSECUTOR v. GERMAIN KATANGA***

PUBLIC REDACTED VERSION

**Submissions on the Document Filed by the Office of Public Counsel for Victims
in Support of its Appeal (ICC-01/04-01/07-3746-Conf)**

Source: Legal Representative of Victims

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

Office of the Prosecutor

**Counsel for the Defence
of Germain Katanga**
Mr David Hooper

Legal Representatives of Victims
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Legal Representatives of Applicants

Unrepresented Victims

**Unrepresented Applicants for
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**Victims Participation and Reparations
Section**

**Other
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Mr Pieter de Baan

I. SUBJECT OF THESE SUBMISSIONS

1. The Legal Representative has taken note of the document filed by the Office of Public Counsel for Victims (“OPCV”) in support of its appeal.¹ He submits that the procedural error invoked in that document relies on a misrepresentation of the facts, in particular a misrepresentation of the Legal Representative’s discharge of his representation agreement in respect of the victims whom the OPCV refers to as the “Concerned Victims” before he withdrew from the agreement. In these circumstances, he considers it his duty to respond to the document.

2. The Legal Representative further submits that – without objective justification – the OPCV has asked the Appeals Chamber to proceed in a manner that would discriminate between said “Concerned Victims” and the victims whom he represents and whose claims were wholly or partly rejected in the “Order for Reparations pursuant to article 75 of the Statute” (“Order for Reparations”),² issued by Trial Chamber II on 24 March 2017. The OPCV has effectively asked the Appeals Chamber to open new reparations proceedings enabling the Concerned Victims to complete their applications for reparations and have their claims ruled on anew, even though Trial Chamber II (“Chamber”) has already examined and ruled on their applications, applying a similar process for all the applicants. The OPCV has accordingly requested a full appellate review for some of the victims covered by the Order for Reparations, specifically those represented by the OPCV since 15 March 2017,³ without objective justification and to the disadvantage of the victims represented by the Legal Representative. The Legal Representative therefore intends to respond to the OPCV’s argument in that regard.

3. In accordance with regulation 23 *bis* of the Regulations of the Court, these submissions are filed as “confidential” because they refer to documents with that

¹ “Document in Support of the Appeal against Trial Chamber II’s ‘*Ordonnance de réparation en vertu de l’article 75 du Statut*’”, 27 June 2017, ICC-01/04-01/07-3746-Conf. A public redacted version of the document was notified on 28 June 2017, ICC-01/04-01/07-3746-Red.

² ICC-01/04-01/07-3728-tENG.

³ “*Décision relative à la requête du Représentant légal commun des victimes du 2 mars 2017*”, ICC-01/04-01/07-3727.

classification. In order to fulfil the requirement for public proceedings set forth in article 64 of the Rome Statute (“Statute”), the Legal Representative will file a public redacted version of these submissions shortly.

II. PROCEDURAL HISTORY

4. On 7 March 2014, Germain Katanga was convicted of crimes against humanity and war crimes committed during the attack on Bogoro on 24 February 2003.⁴

5. On 23 May 2014, Trial Chamber II, by majority, sentenced Mr Katanga to 12 years’ imprisonment.⁵

6. On 8 May 2015, Trial Chamber II issued a Decision on the “*Demande de clarification concernant la mise en œuvre de la Règle 94 du Règlement de procédure et de preuve et les étapes ultérieures de la procédure*” (“Decision No. 3546”).⁶

7. In that Decision, the Chamber ordered the Legal Representative, in consultation with the Registry, to submit the consolidated requests for reparations for the victims authorized to participate in the proceedings as well as any new requests for reparations by 1 October 2015.⁷ Ruling on two requests from the Legal Representative,⁸ the Chamber extended that deadline twice, first to 1 December 2015,⁹ then to 29 February 2016.¹⁰

⁴ “Judgment pursuant to article 74 of the Statute”, ICC-01/04-01/07-3436-tENG.

⁵ “Corrigendum of Translation of Decision on Sentence pursuant to article 76 of the Statute”, ICC-01/04-01/07-3484-tENG-Corr.

⁶ “Decision on the ‘*Demande de clarification concernant la mise en œuvre de la Règle 94 du Règlement de procédure et de preuve*’ and future stages of the proceedings”, ICC-01/04-01/07-3546-tENG.

⁷ Decision No. 3546, operative part and para. 19.

⁸ “*Demande en prorogation du délai fixé par la décision ICC-01/04-01/07-3546 pour le dépôt et la transmission des demandes en réparation*”, 7 September 2015, ICC-01/04-01/07-3586; “*Demande en prorogation du délai fixé par la décision ICC-01/04-01/07-3599 pour le dépôt et la transmission des demandes en réparation*”, 25 November 2015, ICC-01/04-01/07-3620 (notified on 26 November 2011).

⁹ “Decision on the requests of the Common Legal Representative of Victims and the Registry for an extension of time limit for transmitting and filing applications for reparations”, 25 September 2015, ICC-01/04-01/07-3599-tENG.

¹⁰ “*Décision accordant une nouvelle prorogation de délai au Représentant légal commun des victimes pour le dépôt des demandes en réparation*”, 8 December 2015, ICC-01/04-01/07-3628.

8. In accordance with the Decision of 8 May 2015, the Legal Representative and his team travelled to the field between June 2015 and February 2016 to meet all of the participating victims and the new applicants for reparations. During those meetings, they collected, to the extent possible, supporting documentation to accompany the requests for reparations, and consolidated the victims' applications.

9. In October 2015, the Legal Representative began to file the consolidated applications for reparations with the Registry.

10. On 16 March 2016, [REDACTED], the Legal Representative requested the Chamber's prior consent for his withdrawal from his representation agreement with respect to 93 victims authorized to participate in the proceedings in Mr Katanga's trial ("participating victims") and/or who had submitted applications for reparations ("reparations applicants").¹¹

11. In a Decision issued on 18 May 2016, the Chamber consented to the Legal Representative's withdrawal from the representation agreement in respect of 51 applicants [REDACTED].¹² [REDACTED].¹³ [REDACTED].¹⁴

12. [REDACTED].¹⁵ In a Decision of 15 March 2017, the Chamber consented to the Legal Representative's withdrawal from the representation agreement in respect of the 42 applicants and saw fit to appoint the OPCV to represent them should they subsequently wish to appeal.¹⁶

13. On 13 May 2016, the Legal Representative filed his "Report on the implementation of Decision No. 3546, including the identification of harm suffered by victims as a result of crimes committed by Germain Katanga (article 75(1) of the Statute and regulation 38(1)(f) of the Regulations of the Court)".¹⁷ [REDACTED].¹⁸

¹¹ "Rectificatif de la 'Demande de retrait de mandat du Représentant légal relativement à certaines victimes ayant été autorisées à participer à la procédure'", 24 March 2016, ICC-01/04-01/07-3670-Conf-Corr.

¹² [REDACTED].

¹³ [REDACTED].

¹⁴ [REDACTED].

¹⁵ [REDACTED].

¹⁶ "Décision relative à la requête du Représentant légal commun des victimes du 2 mars 2017", ICC-01/04-01/07-3727, paras. 12 et seq.

¹⁷ ICC-01/04-01/07-3687-tENG.

14. On 24 March 2017, Trial Chamber II issued its “Order for Reparations pursuant to Article 75 of the Statute”.¹⁹ In the Order, the Chamber determined that 297 of the reparations applicants, 283 of whom were represented by the Legal Representative, had shown that they were victims. Accordingly, the Chamber awarded them individual reparations and targeted collective reparations,²⁰ and assessed the total monetary value of the extent of the harm suffered at USD 3,752,620. It set the reparations award for which Mr Katanga is liable at USD 1,000,000.

15. The Order for Reparations is accompanied by one public annex detailing the procedural history (“Annex I”)²¹ and one confidential *ex parte* annex containing an individual analysis of all of the requests for reparations (“Annex II”).²²

16. On 25 April 2017, the Legal Representative filed a notice of appeal against part of the Order and its Annex II.²³

17. On 26 April 2017, the Defence filed a notice of appeal against part of the Order.²⁴

18. On the same day, the OPCV filed a notice of appeal against the whole Order and its Annex II in respect of the 37 reparations applicants represented by the OPCV.²⁵

¹⁸ “Transmission du ‘Rapport d’expertise sur l’évaluation de l’état psychique des enfants victimes de l’attaque de Bogoro du 24 février 2003’”, ICC-01/04-01/07-3692-Red2.

¹⁹ “Order for Reparations pursuant to Article 75 of the Statute”, 24 March 2017, ICC-01/04-01/07-3728-tENG, with one public annex (Annex I) and one confidential *ex parte* annex available only to the Common Legal Representative of Victims, the Office of Public Counsel for Victims and the Defence team for Germain Katanga (Annex II).

²⁰ Order for Reparations, operative part, pp. 118-120.

²¹ ICC-01/04-01/07-3728-AnxI-tENG.

²² ICC-01/04-01/07-3728-Conf-Exp-AnxII. A public redacted version was notified on 3 August 2017, ICC-01/04-01/07-3728-AnxII-Red.

²³ “Notice of Appeal against the ‘Ordonnance de réparation en vertu de l’article 75 du Statut’ and its Annex II”, ICC-01/04-01/07-3737-tENG.

²⁴ “Defence Notice of Appeal against the ‘Ordonnance de réparation en vertu de l’article 75 du Statut’”, ICC-01/04-01/07-3738.

²⁵ “Notice of Appeal against the Reparations Order and its Annex II issued in accordance with article 75 of the Statute on 24 March 2017”, ICC-01/04-01/07-3739.

19. On 27 June 2017, the Legal Representative,²⁶ the Defence²⁷ and the OPCV²⁸ filed documents in support of their appeals.

III. THE GROUND OF APPEAL INVOKED BY THE OPCV

20. The OPCV claims that the Chamber committed a procedural error by failing to appoint a legal representative immediately after having granted the Legal Representative's request to withdraw from the representation agreement in respect of the victims concerned by the OPCV's appeal, specifically the victims now represented by the OPCV whose reparations claims were either partly or wholly rejected.

21. The OPCV contends that, as a result of the Legal Representative's withdrawal from the representation agreement, those victims were unable to benefit from advice on how to complete their applications, which they would otherwise have been able to do during the period between the termination of the representation agreement in September 2016 and the appointment of the OPCV to represent them in March 2017.²⁹

22. The OPCV maintains that the Chamber should have appointed new counsel to represent those victims immediately after the Legal Representative's withdrawal, which would have enabled them to complete their applications. The OPCV contends that those victims' lack of legal representation during the period immediately following the termination of the representation agreement on 6 September 2016³⁰ affected both the way their applications were examined and the findings made in their respect in the Order for Reparations.

²⁶ "Document in Support of the Appeal against the Order for Reparations under Article 75 of the Statute with its Annex II", ICC-01/04-01/07-3745-t-ENG.

²⁷ "Defence Document in Support of Appeal against the Reparations Order", ICC-01/04-01/07-3747-Conf-Exp. A public redacted version was notified on 29 June 2017, ICC-01/04-01/07-3747-Red.

²⁸ "Document in Support of the Appeal against Trial Chamber II's '*Ordonnance de réparation en vertu de l'article 75 du Statut*'", ICC-01/04-01/07-3746-Conf. A public redacted version was notified on 28 June 2017, ICC-01/04-01/07-3746-Red.

²⁹ ICC-01/04-01/07-3746-Red, paras. 29-46.

³⁰ "Second decision on the Legal Representative of the Victims' request for termination of the representation agreement", 6 September 2016, ICC-01/04-01/07-3706-Conf.

23. The OPCV consequently calls on the Appeals Chamber to reverse the Order for Reparations and to implement reparations proceedings in accordance with article 75 of the Statute for the Concerned Victims only, by allowing them to complete their applications and by examining and ruling anew on their claims.³¹

IV. LEGAL REPRESENTATIVE'S SUBMISSIONS

A. Misrepresentation of the facts to prompt the Appeals Chamber to find a procedural error

24. The OPCV's statement of the facts in support of its claim of procedural error contains two serious flaws. These concern the manner in which the Legal Representative undertook the necessary steps to file the applications for reparations for all of the victims he was representing, including the Concerned Victims, and the process undertaken by the Chamber to allow the applications to be filed by 29 February 2016, and to examine and rule on all of the applications.

25. It is important, therefore, to recall both the subject matter of the Decision of 8 May 2015, in which the Legal Representative was ordered to complete the applications for reparations, and the process by which he fulfilled the Chamber's instruction, given that the procedural error invoked by the OPCV's Appeal relies on an erroneous and partial description of those procedural elements.

26. On 8 May 2015, the Chamber ordered the Legal Representative to consolidate all the requests for participation and/or reparations initially submitted by victims authorized to participate in proceedings, accompanied "– where possible – by supporting documentation attesting to the extent of the harm suffered and the causal link between the alleged harm and the crime committed."³² It further ordered the Legal Representative to represent any victims who had not yet made themselves known and who wished to submit requests for reparations in the case.³³

³¹ ICC-01/04-01/07-3746-Red, paras. 47-49.

³² Decision No. 3546, paras. 18 and 19.

³³ Decision No. 3546, operative part and para. 19.

27. In fulfilment of the Decision, the Legal Representative and his team travelled to the field with a view to (i) collecting any information substantiating participating victims' requests for reparations, including, where appropriate, by gathering supporting documentation; and (ii) identifying victims who had not yet come forward ("new applicants") and, where appropriate, drawing up their requests for reparations, where appropriate. Over a period totalling more than nine months, between June 2015 and February 2016, they met 499 victims, including new applicants.

28. In his Report on the implementation of Decision No. 3546, including the identification of harm suffered by victims as a result of crimes committed by Germain Katanga,³⁴ the Legal Representative describes the method used:

In fulfilment of Decision No. 3546, the Legal Representative therefore completed the existing dossiers and proceeded to draw up new dossiers for new applicants. He did this by conducting a detailed analysis of the requests from the point of view of harm and its causal link with the crimes of which Germain Katanga had been convicted. He performed stringent checks of the information gathered by conducting investigations on the ground, cross-checking information and holding in-depth interviews with some victims (whether existing participants or new applicants) (see below, 1 and 2). All interviews were carried out in accordance with a standard procedure decided in advance by the team. Following these interviews, annexes containing additional information (for victims who had already filed a request for reparations) or requests for reparations were completed in a pre-determined format (see 3, below). Additional supporting documents were also collected in accordance with a strict methodology (see 4, below).³⁵

29. The process followed was therefore the same for all the applicants: investigations and checks on the ground, which included cross-checking facts with various prominent figures and/or people who knew the region well and, specifically, the situation in Bogoro in 2003, and in-depth interviews with the victims.

As the Legal Representative described:

Individual meetings provided a new opportunity to explain the significance of Germain Katanga's conviction and its ramifications. They allowed each person's dossier to be discussed in detail, clarifications to be sought and, where appropriate, explanations of the desired reparations to be requested.

³⁴ "Report on the implementation of Decision No. 3546, including the identification of harm suffered by victims as a result of crimes committed by Germain Katanga (article 75(1) of the Statute and regulation 38(1)(f) of the Regulations for the Court)", 13 May 2016, ICC-01/04-01/07-3687-tENG.

³⁵ *Ibid.*, para. 11.

A recurring difficulty was that several victims saw the attack on Bogoro as the continuation of other attacks that had taken place between 2001 and 2003. They struggled to understand why they should single out events that, in their minds, concern one and the same conflict. Owing to the length of time that had elapsed and/or the trauma they had suffered, others confused the various attacks they had survived. Still others could not easily grasp the geographical limit of the crimes of which Germain Katanga was convicted. Moreover, some victims believed that they were somehow acting on behalf of the entire family, ignoring the fact that other family members might also wish to submit a request, thus creating confusion as to the exact harm alleged.³⁶

30. The Legal Representative further explained in his report that his analysis of some dossiers – and the individual interviews that followed – led him to conclude that certain individuals’ situations did not meet the criteria for claiming harm in connection with the crimes of which Germain Katanga was convicted.³⁷ That conclusion was confirmed when it proved impossible to obtain documents to demonstrate the harm (death certificates and certificates of residence, in particular).

31. [REDACTED].³⁸ [REDACTED].³⁹ [REDACTED].⁴⁰

32. The Legal Representative further submits that the OPCV lends the Chamber intentions it did not have, by maintaining that the Chamber instructed the Legal Representative “to submit additional or consolidated documents for the purpose of substantiating the claims for reparation.”⁴¹ At no time did the Chamber instruct the Legal Representative to proceed in that manner, for the very reason that the Chamber stated that it would examine and rule on those applications in their current state.⁴² Contrary to what the OPCV would have us believe, the Chamber was not waiting for the Legal Representative to submit additional documents after the deadline of 29 February 2016, since it intended to examine and rule on the existing applications of the 37 applicants whom the OPCV was appointed to represent [REDACTED].

33. As the process described above indicates, the Legal Representative confirms that those 37 victims had the opportunity to complete their applications in the same

³⁶ *Ibid.*, paras. 18, 19.

³⁷ *Ibid.*, para. 19.

³⁸ [REDACTED].

³⁹ [REDACTED].

⁴⁰ [REDACTED].

⁴¹ [REDACTED].

⁴² [REDACTED].

conditions and with the same support from the Legal Representative as the other applicants. No distinction was made in the procedure followed. The factual and procedural elements make it clear that the failure to provide supplementary or replacement documents within the time frame set by the Chamber, i.e. by 29 February 2016,⁴³ was not because those applicants had not been given the opportunity to do so, since they benefited from the support of the Legal Representative at the time, [REDACTED].

34. It is important to bear in mind that, for various reasons, not all of the consolidated applications submitted by the Legal Representative were supplemented with additional documentation.⁴⁴ The absence of additional documents was not unique to the files of the 37 Concerned Victims.

35. It is therefore unwarranted to contend that the Concerned Victims were prevented, in violation of the procedure, from filing additional evidence and that, as a result, they lost the opportunity to have their applications examined fairly. Yet that is the sense of the OPCV's claim in the following:

The period of time preceding the issuance of the Impugned Decision, during which the Concerned Victims remained unrepresented, was particularly significant because during said period they could have still been in a position to complete their application for reparation [Emphasis added]. At the time the Chamber issued its Second Decision on Withdrawal, it was aware of and acknowledged the fact that it was not in possession of adequate evidence supporting the claims for reparations of the Concerned Victims and therefore it should have immediately appointed a new lawyer in order to allow them to complete their application for reparation with sufficient evidence.⁴⁵

36. When the OPCV contends that the Chamber did not give the victims concerned by the Appeal the opportunity to submit evidence in support of their claims after the Legal Representative had withdrawn from his representation agreement,⁴⁶ a long time after the deadline for filing the applications for reparations, or when it claims that the victims were not in a position to provide their counsel with information that could allow him to advise and help them in completing their

⁴³ NB The representation agreement was terminated after that date.

⁴⁴ In some files, existing documents were replaced by new ones or simply removed.

⁴⁵ ICC-01/04-01/07-3746-Conf, para. 34 [Footnote omitted].

⁴⁶ ICC-01/04-01/07-3746-Conf, para. 36: "the Concerned Victims were clearly not in a position to submit all necessary materials regarding their applications for reparations after the Chamber terminated the Former Legal Representative's mandate."

applications for reparations,⁴⁷ the OPCV disregards the process undertaken by the Legal Representative and the steps he took to discharge his representation agreement in respect of those victims.

37. The Legal Representative therefore cannot accept such an argument, which raises serious doubts about the manner in which he discharged his representation agreement, especially when it is used to invoke a procedural error and seek a remedy that would discriminate against the victims he represents (see below).

38. Furthermore, the Legal Representative cannot accept the OPCV's claim that the Concerned Victims were not informed about the progress of the reparations proceedings. Once his withdrawal from the representation agreement was authorized, the Legal Representative personally informed all the victims concerned of the decision.⁴⁸

B. The discriminatory nature of the request to reverse the Order for Reparations

39. In Decision No. 3546, the Chamber indicated that it intended,

on the basis of all the documents submitted, and after considering, *inter alia*, the observations of the Defence [...] [to] consider, on a case-by-case basis, whether the requests, within the meaning of rule 94 of the Rules justify the awarding of reparations.⁴⁹

40. After the deadline for the submission of the consolidated applications and any new requests for reparations (29 February 2016), the Chamber examined and ruled on all the requests for reparations, including the files of the 37 applicants in respect of whom the Legal Representative had requested to withdraw from his representation agreement. Regarding those applicants, the Chamber decided that it should examine and rule on their files in their existing state. The Chamber rejected the applications of 23 individuals from that group of applicants, and recognized 14 as victims eligible for reparations. Of the latter, the Chamber recognized the full

⁴⁷ ICC-01/04-01/07-3746-Conf, para. 37.

⁴⁸ In accordance with Decision ICC-01/04-01/07-3706-Conf, the Legal Representative met the victims concerned and notified them of his withdrawal from the representation agreement during a field mission between 29 October and 13 November 2016.

⁴⁹ Decision No. 3546, para. 21.

extent of the harm claimed by five applicants, accepting the credibility of the evidence provided, in particular the documents submitted.

41. Nevertheless, the Legal Representative submits that the OPCV's request to the Appeals Chamber amounts to granting a full appellate review to all of the victims represented by the OPCV, including those whose claims were recognized in part.

42. The OPCV fails to justify the discrimination that would subsequently be introduced between the victims represented by the OPCV and the victims represented by the Legal Representative whose claims were partly or wholly rejected in the same conditions.

43. The Legal Representative refers in this regard to the widely accepted principle that a difference in treatment is discriminatory if it has no objective and reasonable justification, in other words, if it does not pursue a legitimate aim or if there is not a reasonable relationship of proportionality between the means employed and the aim sought to be realized.⁵⁰

44. Neither the criterion of legitimacy nor that of proportionality is met here. As explained above, all of the applications were processed in the same manner within the framework of the Legal Representative's representation agreement. The OPCV fails to justify why only the Concerned Victims would be entitled to appeal against a ruling on the merits of their applications, giving them an advantage over other victims whose claims were also rejected, even though all of the applications were processed in the same manner, under the same procedural conditions and with the same opportunity to provide supporting documentation to accompany their applications. The lack of legal representation during a period outside the time frame of that procedural process is obviously irrelevant here.

45. The Legal Representative submits that, furthermore, the remedy sought by the OPCV would effectively place one party to the proceedings at an advantage,

⁵⁰ See the abundant case law on this point, in particular that of the European Court of Human Rights and most notably the Grand Chamber Judgment: *D.H. and Others v. the Czech Republic*, 13 November 2007, (application no. 57325/00), and the judgments in *Willis v. the United Kingdom*, 11 June 2002, (application no. 36042/97, and *Okpiz v. Germany*, 25 October 2005 (application no. 59140/00).

something that is also widely recognized as contrary to the requirements of a fair trial.⁵¹

46. In conclusion, two important facts should be emphasized:

- The procedure in fulfilment of Decision No. 3546 was completed by the deadline of 29 February 2016 in the same manner for all the applicants, i.e. 499 individuals, including the 37 victims now represented by the OPCV; and
- The Chamber ruled on the new and existing applications in the same conditions and according to the same criteria for all the applicants.

47. The OPCV's claim of procedural error disregards both of those facts.

48. Moreover, the OPCV cannot demonstrate harm caused by the lack of representation of the Concerned Victims during the period between the Legal Representative's withdrawal from the representation agreement and the appointment of the OPCV, since that "interim" period was outside the time frames of both the process in fulfilment of Decision No. 3546 and of the procedure followed by the Chamber to issue the Order for Reparations and Annex II. The appointment of the OPCV at an earlier date would not, therefore, have affected the impugned decision, since the procedure for filing the applications had closed before the Legal Representative withdrew from the representation agreement.

49. The OPCV's argument therefore either deliberately disregards that procedure and its deadline or implies that the Legal Representative failed to discharge his representation agreement in respect of the Concerned Victims.

50. Lastly, the Legal Representative submits that, since the procedural error invoked relies on a truncated presentation of the proceedings, the appeal is inadmissible because the OPCV fails to demonstrate that the alleged error materially affected the impugned decision. Moreover, even regardless of the assessment of the error invoked, the appeal must be dismissed because it is discriminatory.

⁵¹ See the judgment in *Hentrich v. France*, 22 September 1994 (application no. 13616/88).

FOR THESE REASONS,

May it please the Appeals Chamber to dismiss the OPCV's appeal as unfounded.

[signed]

Mr Fidel Nsita Luvengika

Legal Representative of Victims

Dated this 26 February 2018

At Bunia, Democratic Republic of the Congo