

**Cour
Pénale
Internationale**



**International
Criminal
Court**

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16 December 2019

TRIAL CHAMBER X

Before: Judge Antoine Kesia-Mbe Mindua, Presiding Judge
Judge Tomoko Akane
Judge Kimberly Prost

SITUATION IN THE REPUBLIC OF MALI

IN THE CASE OF
THE PROSECUTOR v. AL HASSAN AG ABDOUL AZIZ AG MOHAMED
AG MAHMOUD

Public

**With confidential, *EX PARTE*, Annexes A to J,
only available to the Prosecution and the Victims and Witnesses Unit**

**Public redacted version of "Prosecution motion for authorisation to withhold
information identifying Witnesses MLI-OTP-P-0636, MLI-OTP-P-0638, MLI-OTP-
P-0639, MLI-OTP-P-0641 and MLI-OTP-P-0642 from their statements ",
13 November 2019, ICC-01/12-01/18-487-Conf-Exp**

Source: Office of the Prosecutor

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Introduction

1. Pursuant to article 68(1) of the Rome Statute ("Statute") and rule 81(2) and (4) of the Rules of Procedure and Evidence ("Rules"), the Prosecution seeks the Single Judge's authorisation to withhold the identity of Prosecution Witnesses P-0636, P-0638, P-0639, P-0641 and P-0642 by redacting all identifying information from their statements in order to protect their safety and that of their families, as well as the Prosecution's ongoing investigations.

2. All these witnesses lived in Timbuktu during the occupation by Ansar Dine and AQMI. [REDACTED]
[REDACTED]. The security situation of all five witnesses needs to be properly assessed to determine any risk arising from the armed groups [REDACTED] becoming aware of their cooperation with the Prosecution.

3. P-0636 was interviewed by the Office of the Prosecutor ("OTP") from [REDACTED]
[REDACTED] [REDACTED] uring the occupation of Timbuktu, she was between [REDACTED] and [REDACTED] years old, lived in the house [REDACTED] and was married to [REDACTED]
[REDACTED]. She was arrested by [REDACTED] armed men and taken to the Islamic police, where she was detained for [REDACTED]. During the night, she was raped by three armed men. [REDACTED]
[REDACTED]
[REDACTED] She knows another girl who was impregnated while detained by the Islamists, and who gave birth to a child. She also knows a girl who fled Timbuktu rather than being subjected to a forced marriage to an Islamist.

4. P-0638 was interviewed by the OTP from [REDACTED] [REDACTED] He was arrested [REDACTED] in Timbuktu [REDACTED] He was brought to the Islamic police, where he saw AL HASSAN; detained for [REDACTED] brought to and judged by the Islamic Tribunal, [REDACTED]

and beaten in execution of his sentence. P-0638 heard that AL HASSAN acted as interpreter during the early days of the occupation, and later became *commissaire*.

5. P-0639 was interviewed by the OTP from [REDACTED] [REDACTED] [REDACTED]
[REDACTED]
[REDACTED] [REDACTED]. [REDACTED]
[REDACTED] was arrested and the Islamists attempted to arrest [REDACTED], both as a result of their not being sufficiently veiled. P-0639 witnessed the implementation of various punishments meted out by members of the armed groups: the amputation of DEDEOU's hand, the flogging of [REDACTED] and the latter's girlfriend for adultery, and of an old man for smoking.
6. P-0641 was interviewed by the OTP from [REDACTED] [REDACTED]. He was arrested by members of the armed groups and [REDACTED]
[REDACTED] [REDACTED]. P-0641 witnessed the amputation of DEDEOU's hand and the flogging of a couple for adultery. He identifies perpetrators of various crimes committed during the occupation and their victims.
7. P-0642 [REDACTED] [REDACTED] [REDACTED] by the OTP. She corroborates many aspects of [REDACTED] evidence, particularly the latter's victimization and that [REDACTED] [REDACTED] and P-0642. In contrast with [REDACTED] P-0642 states that [REDACTED] was not arrested nor flogged, as she normally did not leave her house during the occupation. P-0642 also says that [REDACTED] [REDACTED] did not visit [REDACTED]
8. The disclosure of these witnesses' identities is not advisable at this stage:

- P-0639 [REDACTED]
[REDACTED]

[REDACTED],¹ the risk [REDACTED]
 [REDACTED] is high should the armed groups [REDACTED]
 [REDACTED] learn about their cooperation with the Prosecution. [REDACTED]
 [REDACTED]
 [REDACTED]
 [REDACTED]. In the interim, redaction of information identifying him from his statement is the only effective protective measure;

- [REDACTED], P-0641 [REDACTED]
 [REDACTED]
 [REDACTED]
 [REDACTED]
 [REDACTED]
 [REDACTED]. Pending this meeting and such discussions, redaction of information identifying P-0641 from his statement is the only way at this stage to sufficiently mitigate risks to his safety and security and that of his family;

- [REDACTED] P-0642 [REDACTED]
 [REDACTED]
 [REDACTED]
 [REDACTED]
 [REDACTED]. However, until [REDACTED]
 [REDACTED], redaction of information identifying her from her statement is the only effective protective measure;

- P-0638 [REDACTED]
 [REDACTED]

¹ [REDACTED]
 [REDACTED].

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]. Pending this evaluation, the only effective way to sufficiently mitigate risks to his safety and security and that of his family is by redacting all information in his statement which identifies him;

- P-0636 [REDACTED]
- [REDACTED]
- [REDACTED]
- [REDACTED]
- [REDACTED]
- [REDACTED]

[REDACTED]. Pending this determination, the prudent approach therefore is to redact all identifying information from her statement at this juncture;

9. [REDACTED]
- [REDACTED]
- [REDACTED].

10. Accordingly, the Prosecution requests that all identifying information in the statements of P-0636, P-0638, P-0639, P-0641 and P-0642 be withheld prior to their disclosure to the Defence until such time that assessments have been conducted and the protective measures have been implemented where necessary.

Urgency

11. This motion is classified as urgent as the Prosecution intends to file a request to amend the charges in this case to add incidents underlying the charges earlier confirmed by the Chamber. This amendment will be based on, among others, information provided by some of the witnesses subject of this motion. The Defence will be furnished with the request to amend, along with the relevant statements annexed thereto. These statements will contain the appropriate redactions should the Single Judge grant the present request. In addition, while most of the information provided by these witnesses is incriminatory, P-0642 and P-0638 have also furnished potentially exculpatory evidence. The Prosecution wishes to disclose such information to the Defence as soon as it can do so without endangering the security of the Prosecution witnesses.

Confidentiality

12. Pursuant to regulation 23*bis*(2) of the Regulations of the Court, this motion and its annexes are filed confidential, *ex parte*, available only to the Prosecution and VWU.

13. This motion discusses security concerns specific to Witnesses P-0636, P-0638, P-0639, P-0641, and P-0642, and the annexes contain identifying information the disclosure of which would place the witnesses at risk and render the motion moot.

14. The annexes to this motion are as follows:

P-0636

- Annex A contains the statement of Witness P-0636² and two attached annexes containing a sketch of an object used by elements of the armed groups to destroy mausoleums [REDACTED] (annex A to P-0636's statement)³ and a [REDACTED] [REDACTED] (annex B to P-0636's statement);⁴
- Annex B contains [REDACTED] [REDACTED].

P-0638

- Annex C contains the statement of Witness P-0638;⁵
- Annex D contains [REDACTED].

P-0639

- Annex E contains the statement of Witness P-0639,⁶ and six attached annexes containing a colour chart (annex 1 to P-0639's statement),⁷ a sketch of a weapon (annex 2 to P-0639's statement),⁸ [REDACTED] [REDACTED] (annex 3 to P-0639's statement),⁹ [REDACTED] (annex 4 to P-0639's statement),¹⁰ a sketch of the directions to the former bank, BMS (annex 5 to P-0639's statement),¹¹ and a sketch of the timeline of the occupation of Timbuktu (annex 6 to P-0639's statement);¹²
- Annex F contains [REDACTED].

2 [REDACTED]
 3 [REDACTED]
 4 [REDACTED]
 5 [REDACTED]
 6 [REDACTED]
 7 [REDACTED]
 8 [REDACTED]
 9 [REDACTED]
 1 [REDACTED]
 11 [REDACTED]
 12 [REDACTED]

P-0641

- Annex G contains the statement of Witness P-0641,¹³ and three attached annexes containing [REDACTED] [REDACTED] (annex 1 to P-0641's statement)¹⁴ and [REDACTED] [REDACTED] (annexes 2 and 3 to P-0641's statement)¹⁵;
- Annex H contains [REDACTED].

P-0642

- Annex I contains the statement of Witness P-0642,¹⁶ and four attached annexes containing a colour chart (annex 1 to P-0642's statement),¹⁷ [REDACTED] [REDACTED] (annex 2 to P-0642's statement),¹⁸ [REDACTED] [REDACTED] (annex 3 to P-0642's statement),¹⁹ and P-0642's timeline of the events she describes in her statement (annex 4 to her statement);²⁰ and
- Annex J contains [REDACTED].

15. The Prosecution will file a confidential redacted version of the present motion as soon as possible.

Applicable law

16. The Prosecution recalls and reproduces by reference its submissions on the applicable law in motion ICC-01/12-01/18-48-[REDACTED] and the Single Judge's decision ICC-01/12-01/18-88-[REDACTED] resolving the motion.²¹

13 [REDACTED]
 14 [REDACTED]
 15 [REDACTED]
 16 [REDACTED]
 17 [REDACTED]
 18 [REDACTED]

[REDACTED]

20 [REDACTED]

²¹ ICC-01/12-01/18-48-[REDACTED], para. 12-26; ICC-01/12-01/18-88-[REDACTED], particularly para. 15-17.

Submissions

17. Withholding all identifying information from the evidence of Prosecution Witnesses P-0636, P-0638, P-0639, P-0641 and P-0642 is necessary and appropriate under article 68(1) of the Statute and rules 81(4) and 81(2) of the Rules.

A. Witness P-0636's account²²

18. P-0636 is a Malian woman who was between ■ and ■ years of age during the Timbuktu occupation and already married. ■
 ■, she was arrested by ■ armed men and taken to the Islamic police. She was taken to a foul-smelling room where there was another girl. In the evening, she was taken to another room where she was successively raped by three armed men. After she was raped, she was taken back to the foul-smelling room. The armed men then took out the other girl, who later returned crying. This girl told P-0636 that she had also been raped by three armed men.²³

19. P-0636 was released ■
 ■ Less than a week after she was released, P-0636 told her ■
 ■
 ■²⁴

20. From that moment on, P-0636's ■
 ■
 ■²⁵

21. Since her delivery, P-0636 experienced a lot of pain ■
 ■

²² ■.

²³ ■.

²⁴ ■.

²⁵ ■.

22. P-0636 also spoke of other crimes carried out by the Islamists that she witnessed.²⁷

B. Witness P-0638's account²⁸

23. P-0638 is a [REDACTED] Malian male [REDACTED]
[REDACTED].²⁹

24. The arrival of the Islamists did not deter him from staying in Timbuktu as he was unaware of the Islamist's strict [REDACTED] [REDACTED]
[REDACTED]. P-0638 was arrested [REDACTED]
[REDACTED]. [REDACTED] arrested P-0638, [REDACTED],
and brought him to the Islamic police housed in a former bank. [REDACTED]
[REDACTED] sign
identifying it as the Islamic police headquarters. P-0638 noticed such a sign only
sometime in July 2012. P-0638 saw AL HASSAN at the Islamic police when he
was brought there. [REDACTED]
[REDACTED]. P-0638 learned from others who
went to the Islamic police during the early days of the occupation that AL
HASSAN interpreted. Later on, he heard that AL HASSAN became the
commissaire.³⁰

25. P-0638 was detained at the Islamic police [REDACTED] then brought [REDACTED]
[REDACTED] to the Islamic Tribunal at the *Hotel La Maison* in the Koira Tao
area. Throughout the occupation, he never saw a sign at the Hotel La Maison
indicating that it was the Islamic Tribunal, although he says that everyone knew

²⁶ [REDACTED].

²⁷ [REDACTED].

²⁸ [REDACTED].

²⁹ [REDACTED].

³⁰ [REDACTED].

this was where people were brought to be judged. Islamists there said that the Quran proclaimed that those who drink alcohol should be beaten, those who kill should be killed, and those who steal should have their hands cut off. HOUKA HOUKA, [REDACTED], was present

[REDACTED]¹

26. P-0638 was beaten [REDACTED]

[REDACTED]

[REDACTED] Having been beaten, P-0638 felt sore all over, and could not lie on his back.³²

27. P-0638 saw men being trained in the building referred to as the house of Kadhafi, [REDACTED]. Men read the Quran and learned how to operate firearms. P-0638 saw armed men in Islamic police uniforms.³³

28. P-0638 said that AL HASSAN managed Islamic police affairs, such that people would deal with him whenever they were in trouble and brought to the Islamic police. AL HASSAN issued permits, for example, allowing vehicles to leave Timbuktu to go to Kabara.³⁴

29. [REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]. P-0638 notes that many people were puzzled that AL HASSAN had been arrested, as they considered that he had solved numerous problems for

³¹ [REDACTED]
³² [REDACTED]
³³ [REDACTED]
³⁴ [REDACTED]

them during the occupation. P-0638, however, considered that it was only just that he was arrested as he had joined the Islamists and Al Qaeda.³⁵

C. Witness P-0639's account³⁶

30. P-0639 is a [REDACTED]
[REDACTED]. [REDACTED]
[REDACTED] [REDACTED] [REDACTED]
[REDACTED], [REDACTED].³⁷

31. [REDACTED] was arrested by Islamists for not wearing a veil. The Islamists [REDACTED] threw her into their pick-up truck. The driver said they would bring her to the commissariat at the BMS. She was eventually released within [REDACTED] days, but she was traumatized by her imprisonment. [REDACTED]

[REDACTED] P-0639 is not aware of whether [REDACTED] was raped while in detention, although he says he knows she was subject to things in prison.³⁸ [REDACTED] would also have been arrested by the Islamists for baring her head, shoulders and arms, but she managed to evade arrest [REDACTED].³⁹

32. P-0639 came across a man crying in the middle of the Youbou Tao market. This man was around 50-60 years old, and P-0639 spoke to a man beside him who said that the old man had just been given 10 lashes for smoking.⁴⁰

33. P-0639 also witnessed the amputation of DEDEOU's hand and the Islamists' destruction of the Sidi Mahmoud cemetery, and learned about the flogging of [REDACTED] and the latter's girlfriend for having been found together in a room.⁴¹

³⁵ [REDACTED].
³⁶ [REDACTED].
³⁷ [REDACTED].
³⁸ [REDACTED].
³⁹ [REDACTED].
⁴⁰ [REDACTED].

D. Witness P-0641's account⁴²

34. P-0641 is a Malian male born around [REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED].⁴³

35. P-0641 describes AL HASSAN as the Islamic police *commissaire*. The witness spoke to people [REDACTED], and they would relate that they [REDACTED]
[REDACTED]
[REDACTED]. P-0641 also referred to a dispute between [REDACTED]
[REDACTED] L HASSAN resolved the dispute by deciding in favour of [REDACTED] and ordering [REDACTED] to settle his arears.⁴⁴

36. P-0641 noted that AL HASSAN's men often wore a blue vest with the inscription "Police Islamique" written in French and Arabic, and they managed traffic and security, and punished petty crimes, along with cases of theft and adultery. They would conduct patrols throughout Timbuktu and carried out arrests and public sanctions.⁴⁵

37. P-0641 recalled that Hamed MOUSSA would arrest women and imprison them in the small room of the BMS previously housing the cashpoint. Women were subjected to forced marriages and rapes, [REDACTED]
[REDACTED]. [REDACTED], which he has since lost, of women

41 [REDACTED].
42 [REDACTED].
43 [REDACTED].
44 [REDACTED].
45 [REDACTED].

41. P-0642 confirmed [REDACTED]
 [REDACTED] after watching [REDACTED] be flogged by Islamists. Due to the lack of medical personnel in Timbuktu, P-0642 did not receive adequate medical attention. She [REDACTED]
 [REDACTED]
 [REDACTED]⁵¹

42. P-0642 describes how [REDACTED]
 [REDACTED]
 [REDACTED]⁵²

F. The redaction of these witnesses' statements under rule 81(4) of the Rules is necessary for their protection

43. The prevailing security situation in northern Mali remains precarious.⁵³ The Prosecution refers to its prior redaction requests,⁵⁴ [REDACTED]⁵⁵ and [REDACTED]⁵⁶

44. The Single Judge has granted these prior redaction requests on the basis of, among others, his acceptance that the ability of armed groups operating in northern Mali, [REDACTED] to carry out targeted attacks establishes an objective risk to the safety and security of witnesses [REDACTED]
 [REDACTED]⁵⁷

The identities of P-0636, P-0638, P-0639, P-0641 and P-0642 may become known to these armed groups through an intentional or inadvertent disclosure of information provided to the Defence under the Court's disclosure regime.

⁵¹ [REDACTED]

⁵² [REDACTED]

⁵³ See generally, Report of the UN Secretary-General on the Situation in Mali, 1 October 2019, S/2019/782, para. 37-49, available at https://www.securitycouncilreport.org/atf/cf/%7B65BFCF9B-6D27-4E9C-8CD3-CF6E4FF96FF9%7D/S_2019_782.pdf.

⁵⁴ ICC-01/12-01/15-48-[REDACTED], para. 12-26; ICC-01/12-01/18-88-[REDACTED], particularly para. 15-17.

⁵⁵ [REDACTED]
⁵⁶ [REDACTED]

⁵⁷ See, for example, ICC-01/12-01/18-88, para. 33-36; [REDACTED]; ICC-01/12-01/18-174, para. 31.

P-0639 and P-0641

45. [REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]⁵⁸ [REDACTED]
[REDACTED]. In this context, until proper assessments are made and measures proposed and taken, the security of these two witnesses and that of their families requires protection of their identities. Pending this discussion, redaction of identifying information from their statement is the only effective protective measure.

46. In addition, in case the Single Judge approves the redactions to the statements of P-0639 and P-0641, the Prosecution requests [REDACTED]
[REDACTED]
[REDACTED]⁵⁹ [REDACTED]
[REDACTED]
[REDACTED]
[REDACTED].

P-0642

47. [REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]. During this interim period, she is

⁵⁸ [REDACTED]

⁵⁹ [REDACTED].

subject to a security risk [REDACTED]
[REDACTED]. Thus, [REDACTED], redaction of all information identifying her in her statement is the only way to appropriately mitigate risks to her safety and security.

P-0638

48. [REDACTED]
[REDACTED]
[REDACTED]
[REDACTED].

49. [REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED].

50. [REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]

[REDACTED]

[REDACTED].

51. [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]. Until this assessment is carried out,⁶⁰ the only effective way to appropriately mitigate risks to his safety and security and that of his family is by redacting all identifying information from his statement.

P-0636

52. [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED].

53. [REDACTED]

[REDACTED]

[REDACTED]. Pending this determination, the prudent approach is to redact all identifying information from her statement at this juncture.

54. Overall, non-disclosure of the identities of P-0636, P-0638, P-0639, P-0641 and P-0642 to the Defence pending the ascertainment and implementation of the appropriate protective measures is therefore justified.

⁶⁰ [REDACTED]

⁶¹ [REDACTED]

G. The redaction of these witnesses' statements is likewise necessary under rule 81(2) of the Rules to protect the Prosecution's further or ongoing investigations

55. As mentioned in prior filings, the Appeals Chamber has accepted that "further or ongoing investigations may be prejudiced if potential prosecution witnesses are interfered with in a manner that could lead to them being unable to cooperate further with the Prosecutor."⁶² In previous decisions, the Single Judge has accepted that the non-disclosure of witnesses' identities was justified under rule 81(2) of the Rules, as their non-cooperation as a result of security threats could preclude other witnesses from cooperating with the Prosecution.⁶³

56. Should any harm befall P-0636, P-0638, P-0639, P-0641, P-0642, or their families, as a result of the disclosure of these witnesses' identities, this could discourage them or other current and future witnesses from cooperating with the Prosecution and providing evidence. Any threat to P-0642, for instance, [REDACTED]

H. Lack of prejudice to the Defence

57. The Prosecution submits that redactions of any identifying information from these witnesses' statements will not prejudice the Defence.

58. As noted above, this motion is classified as urgent as the Prosecution seeks to disclose these statements as soon as practicable to the Defence while ensuring the safety and security of the witnesses. The Prosecution submits that it is in the interest of the Defence to receive the evidence provided by these witnesses at the earliest possible opportunity.

⁶² ICC-01/12-01/18-48-[REDACTED], para. 55, citing *Prosecutor v. Katanga*, Judgment on Katanga's Appeal against the First Redaction Decision, ICC-01/04-01/07-476, 13 May 2008, para. 49.

⁶³ See, for example, ICC-01/12-01/18-88, para. 38; [REDACTED]; ICC-01/12-01/18-174, para. 65.

59. The redactions to identifying information in the statements will not deprive the Defence of their substantive content, particularly in relation to the potentially exonerating evidence found in P-0642's statement to the extent that it would diverges from the evidence provided by [REDACTED]

60. Moreover, the portions of P-0638's statement which could also be considered potentially exculpatory, or constituting rule 77 material, remain unredacted. As far as P-0638 was aware, the Islamists did not rape women and he did not hear of any forced marriages in Timbuktu⁶⁴. He also recalled that the *notables* in Timbuktu welcomed the Islamists as the *notables* were not respected by the youth before the Islamists' arrival⁶⁵. He added that at present, there are those who prefer the Islamists to MINUSMA as when the Islamists were around, there was no banditry or theft⁶⁶.

61. Similarly, the Defence will still be made aware of [REDACTED]
[REDACTED], which could be considered material under rule 77 of the Rules. This incident remains unredacted, save for some identifying details such as [REDACTED]
[REDACTED]⁶⁷.

62. The redactions to the statements will only remain until the appropriate protective measures for the individuals and their families can be ascertained and implemented. Once their security situations and risk levels are assessed and adequate protective measures are implemented, these witnesses' identities can be disclosed. As for P-0642, the Prosecution anticipates that her identity can be disclosed in the near future [REDACTED]
[REDACTED].

64 [REDACTED].

65 [REDACTED].

66 [REDACTED].

67 [REDACTED].

Relief requested

63. For the reasons set forth above, the Prosecution seeks from the Single Judge an order under article 68(1) of the Statute and rule 81(2) and (4) of the Rules authorising the Prosecution to redact any information identifying P-0636, P-0638, P-0639, P-0641, and P-0642 in their statements and annexes thereto prior to their disclosure to the Defence.

64. In case the Single Judge approves the redactions to the statements of P-0639 and P-0641, [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED].⁶⁸

65. In the event that the Single Judge were to deny this motion in whole or in part, the Prosecution requests an order permitting the Prosecution to make any necessary disclosures regarding P-0636, P-0638, P-0639, P-0641, and P-0642 only

[REDACTED]

[REDACTED]



Fatou Bensouda, Prosecutor

Dated this 13th day of November 2019
At The Hague, The Netherlands

⁶⁸ [REDACTED]