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TRIAL CHAMBER X

Before: Judge Antoine Kesia-Mbe Mindua, Presiding
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 Annexes A, B and C

Public redacted version of “Prosecution application to call Witnesses MLI-OTP-P-0064, MLI-OTP-P-0635 and MLI-OTP-P-0075 as experts and to introduce their reports and associated material into evidence, and regulation 35 request”, ICC-01/12-01/18-851-Conf, 1 June 2020

Source: Office of the Prosecutor

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

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1. As foreseen in the Decision on the Conduct of Proceedings,¹ the Prosecution requests that Trial Chamber X² authorise calling Witnesses P-0064, P-0635 and P-0075 as experts (“Proposed Experts”) and, pursuant to articles 64(9), 69(2)-(4)³ and rules 63(2) and 68(3)⁴, introducing their reports and associated materials into evidence and permit the Prosecution to conduct a streamlined supplementary examination.
2. The Proposed Experts possess sufficient qualifications and expertise in relation to the subject matter of their proposed testimony, namely satellite imagery (P-0064), geolocation (P-0635), and information technology (P-0075). Their reports and intended testimony properly fall within the scope of expert testimony and are relevant to the issues in the case.
3. The Prosecution seeks the introduction into evidence of the Proposed Experts’ reports. In addition, it seeks to introduce the material associated to these reports. This material includes the annexes to the reports, the letters of instruction (with their own annexes, where applicable) and the Proposed Experts’ *curricula vitae* – when those documents were not directly included in the reports. This material also includes evidence analysed or processed by Proposed Experts P-0064 and P-0075, namely: (i) for P-0064, satellite imagery from [REDACTED] and Google Earth photographs annotated by the Prosecution;⁵ (ii) for P-0075, the forensic copies of the physical items containing the material he analysed (*i.e.*, [REDACTED] a [REDACTED] and [REDACTED]), the documents containing the logical extractions conducted in this process and documents containing the metadata or other information retrieved from the files.⁶

¹ ICC-01/12-01/18-789-AnxA, para. 67.

² “Chamber”.

³ Rome Statute (“Statute”).

⁴ Rules of Procedure and Evidence (“Rules”).

⁵ [REDACTED].

See Annexes A, B and C for list of items which the Prosecution seeks to introduce for each witness.

4. The Proposed Experts will testify [REDACTED]
[REDACTED] They will be asked to attest to the accuracy of their reports at the beginning of their testimony and to confirm their availability and willingness to be examined by the Parties, Legal Representatives if applicable, and the Chamber.
5. The introduction of the Proposed Experts' reports and associated documents would not be prejudicial to the rights of the Accused and would enhance the expeditiousness of the proceedings by reducing the length of the expert's in-court testimony by one hour. Should this application be granted, the Prosecution intends to conduct a streamlined examination of the Proposed Experts.
6. The Prosecution seeks an extension of time to amend the list of incriminatory evidence to include (i) a [REDACTED] [REDACTED] (ii) the forensic copy of a [REDACTED] [REDACTED] and (iii) the physical item containing the forensic copies of [REDACTED] as well as the forensic copy [REDACTED] [REDACTED] These items were not previously disclosed due to oversight, but the relevant evidence they contained was previously disclosed and, for the most part, relied on in the Document containing the charges and the Pre-Trial Brief.

Confidentiality

7. Pursuant to regulation 23*bis*(1) of the Regulations of the Court,⁷ the Prosecution files this submission and its accompanying annexes as confidential because they contain confidential information including information regarding Prosecution witnesses, in addition to referring to filings classified as confidential. The Prosecution shall file a public redacted version in due course.

⁷ "Regulations".

Prosecution's Submissions

Request to hear Witnesses P-0064, P-0635, and P-0075 as expert witnesses

8. Pursuant to articles 64(9)(a) and 69(4) of the Statute, the Chamber has the discretion to hear a witness as an expert when it is satisfied that (i) the proposed testimony in the relevant area of expertise would be of assistance,⁸ (ii) the proposed witness is an expert,⁹ giving due consideration to whether the person is included in the Registry's list of experts,¹⁰ and (iii) the anticipated testimony falls within the expertise of the witness and does not usurp the functions of the Chamber as ultimate arbiter of fact and law.¹¹

P-0064

9. Witness P-0064 is an expert in satellite imagery. [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED],¹² [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED].¹³

10. [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

⁸ ICC-01/04-01/06-1069, para. 25; ICC-01/05-01/08-2273, para. 8; ICC-01/09-01/11-844, para. 12.

⁹ ICC-01/05-01/08-2273, para. 9; ICC-01/09-01/11-844, para. 11, 12.

¹⁰ See also ICC-01/09-01/11-844, para. 20, noting that the placement of a particular witness on the Court's list of experts is an administrative act on the part of the Registrar that is not binding on the Chamber.

¹¹ ICC-01/09-01/11-844, para. 12.

¹² [REDACTED]

[REDACTED]
[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED].¹⁴

11. [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED].¹⁵ [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED].¹⁶

12. [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED].¹⁷

13. [REDACTED]

[REDACTED].¹⁸ [REDACTED]

14. [REDACTED]

15. [REDACTED]

16. [REDACTED]

17. [REDACTED]

18. [REDACTED]

[REDACTED]¹⁹ [REDACTED]²⁰
 [REDACTED]²¹

14. Witness P-0064 produced two expert reports [REDACTED]
 [REDACTED], containing analysis of satellite imagery of Timbuktu.²²
 The two reports aimed to show, through comparison of satellite imagery between
 and before target dates, any changes in the state of mausoleums and monuments
 located in Timbuktu during the occupation of the city by members of Ansar Dine
 and AQMI (“the Groups”).²³ The reports and their associated material, which
 confirm the destruction (full or partial) of those sites during the period of interest,
 have become relevant to the charges of attack against protected objects (count 7) and
 persecution (count 13) in the *Al Hassan* case.

15. Witness P-0064’s reports and associated material are probative and reliable. The
 reports were prepared voluntarily for the Prosecution by the Proposed Expert in the
 understanding that they could be used as evidence of the attack and destruction of
 monuments by the Groups, and that its author could be selected as an expert witness
 at trial.²⁴ [REDACTED]
 [REDACTED]. The sources of the
 reports are clearly identified therein. P-0064 further explained in his first report how
 the satellite images were acquired [REDACTED].²⁵

¹⁹ [REDACTED]

²⁰ [REDACTED]

²¹ [REDACTED]

²³ The list of these mausoleums and monuments and of the target dates were all specified by the Prosecution in
 the annexes to its mission letters – see the charts and annotated maps mentioned in Annex A, Section II.

²⁴ Mission letters: [REDACTED]
 [REDACTED]

P-0635

16. Witness P-0635 is [REDACTED]
 [REDACTED] Certified Forensic [REDACTED] Analyst²⁶ and an expert in the field of
 forensic [REDACTED] analysis and examination of digital evidence, including notably
 comparison analysis of objects in multimedia evidence and geolocation.²⁷ [REDACTED]
 [REDACTED]²⁸ [REDACTED]
 [REDACTED]²⁹ [REDACTED]
 [REDACTED]³⁰

17. [REDACTED]
 [REDACTED]
 [REDACTED]
 [REDACTED]³¹ [REDACTED]
 [REDACTED]
 [REDACTED]
 [REDACTED]³²

18. [REDACTED]
 [REDACTED]³³ [REDACTED]
 [REDACTED]
 [REDACTED]
 [REDACTED]³⁴ [REDACTED]

²⁶

²⁷ [REDACTED]
 [REDACTED]
 [REDACTED]
 [REDACTED]
 [REDACTED]
²⁹ [REDACTED]
³⁰ [REDACTED]
³¹ [REDACTED]
³² [REDACTED]
³³ [REDACTED]
³⁴ [REDACTED]

[REDACTED]³⁵ [REDACTED]

[REDACTED]³⁶ [REDACTED]

[REDACTED]³⁷ [REDACTED]

[REDACTED]³⁸

19. Witness P-0635 produced a report and an addendum thereto for the Prosecution, containing a technical examination of the [REDACTED] material provided to her by the Prosecution³⁹ and a forensic analysis (specifically geolocation) of sites of interest [REDACTED] namely: the BMS, *Place Sankoré*, the *Petit Marché*, *Hôtel Azalai*, the *Gouvernorat*, *Hôtel Bouctou* and *Hôtel La Maison*.⁴⁰

20. Witness P-0635's report (and addendum⁴¹) and its annexes are relevant. They give information on the geolocation of [REDACTED]
[REDACTED]
[REDACTED], which are all areas of interest in the *Al Hassan* case. They correspond either to sites where crimes were committed or that were occupied by members of the Organisation or its organs, notably the Islamic Police. The conclusions reached by Witness P-0635 are relevant to the determination of the location where crimes were committed by the Accused or where members of the common plan operated. The materials in question analysed by P-0635 include [REDACTED]

[REDACTED]⁴²

21. The report and its addendum are probative and reliable. They were prepared for the Prosecution by Witness P-0635 in the understanding that they could be used

³⁵ [REDACTED]

³⁶ [REDACTED]

³⁷ [REDACTED]

³⁸ [REDACTED]

³⁹ For the list of [REDACTED] to be analysed, see Report, [REDACTED]
[REDACTED], [REDACTED], [REDACTED], and notably Annex 12 to this report (Mission Letter). The [REDACTED] to be analysed are also listed in Annex B to this filing under "III. Material necessary to [REDACTED]'s report".

⁴⁰ [REDACTED], [REDACTED]
[REDACTED], p.9281.

[REDACTED]

⁴² See, [REDACTED]
[REDACTED]

[REDACTED]
[REDACTED]⁴⁹

23. [REDACTED]
[REDACTED]
[REDACTED]⁵⁰ [REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]⁵¹

24. Witness P-0075 produced several reports for the *Al Hassan* case, most of which concern the metadata analysis [REDACTED]. His reports are listed in Section I of Annex C to this filing and can be divided in the following sub-categories of topics: (i) analysis of the metadata [REDACTED] [REDACTED] to assess the date of recording and whether there had been any malicious alterations (nine reports in total); (ii) processing of [REDACTED] collected by the Prosecution and analysis of the metadata [REDACTED] [REDACTED] (four reports); (iii) creation of a forensic copy of [REDACTED] [REDACTED] (two reports); and (iv) creation of a forensic copy [REDACTED] [REDACTED] (one report).

25. Witness P-0075's reports and associated materials are relevant to assess the reliability of an important amount of material (several hundred items) that the Prosecution will rely upon in this case, notably: (i) more than [REDACTED] and [REDACTED] collected by the Prosecution [REDACTED]
[REDACTED]

⁴⁹ [REDACTED]

⁵⁰ [REDACTED]

⁵¹ [REDACTED]

[REDACTED]⁵² [REDACTED]
[REDACTED]
[REDACTED]
[REDACTED] ; (ii) six [REDACTED]
[REDACTED] ; (iii) 70 [REDACTED]
[REDACTED] ; (iv) more than [REDACTED]
retrieved [REDACTED]
[REDACTED] ; and (v) more than 500 [REDACTED]
[REDACTED]

26. The reports have significant probative value. The files analysed are contemporaneous documents from the period relevant to the charges. Therefore, the findings in the reports, notably on the creation date of the relevant files, can help determine not only the integrity of the material analysed, but also its content: what

[REDACTED]

27. Witness P-0075's reports and associated documents are reliable. The reports were prepared voluntarily for the Prosecution by the Proposed Expert in the understanding that they could be used as evidence of the integrity and authenticity of the items analysed and/or processed, and that its author could be selected as an expert witness at trial.⁵³ The sources on which it is based are clearly identified in the report.

⁵² See, e.g., [REDACTED]

⁵³ See the description of P-0075's mandate in his reports on digital forensic analysis and/or letters of instructions:

For Report [REDACTED]
For Report [REDACTED]
For Report [REDACTED]
[REDACTED]
For Report [REDACTED]
For Report [REDACTED]
For Report [REDACTED]
For Report [REDACTED]
For Report [REDACTED]
For Report [REDACTED]
For Report [REDACTED]
For Report [REDACTED]

Request for authorisation to introduce the Proposed Experts' materials into evidence

28. Rule 68(3) of the Rules provides that the Chamber may allow the introduction of the prior recorded testimony of a witness who is present before the Chamber where the individual does not object to the submission, and the Parties⁵⁴ and Chamber have the opportunity to examine the witness. Trial Chambers VI and IX relied on rule 68(3) to receive evidence from expert witnesses in the *Ntaganda* and *Ongwen* cases,⁵⁵ even absent a request from the calling party.⁵⁶ The Prosecution nonetheless notes that this is primarily a *mutatis mutandis* approach, since an expert report is not testimonial in nature, and in this sense, it is different from a statement obtained by the Prosecution under rules 111 or 112. Should the Chamber consider rule 68(3) to be inapplicable where the calling party seeks to introduce an expert's report as prior recorded testimony, due to its documentary nature, the Chamber may admit the report pursuant to its general powers under article 69 of the Statute.

29. In its Decision on the conduct of proceedings, the Chamber ordered the Prosecution to file motivated rule 68(3) applications together with copies of the previously recorded testimony, identifying the precise passages it wishes to tender into evidence, and other materials referred to in these passages that are available to the calling party and, without which, the passages would not be understandable.⁵⁷

For Report

For Report

⁵⁴ ICC-02/11-01/15-744 OA 8, para. 69, stating that “rule 68 (3) of the Rules provides for the possibility for the Prosecutor, the defence and the Chamber to have the opportunity to examine the witness during the proceedings – this de facto includes the calling party, which in the instant case is the Prosecutor”.

⁵⁵ ICC-01/04-02/06-845, ICC-01/04-02/06-T-31-CONF-ENG, p.75, ll.7-16.

⁵⁶ ICC-01/04-02/06-T-87-ENG CT, p. 3-4, ICC-01/04-02/06-T-113-Red-ENG WT, p.27, l. 17 - p.28, l. 6.

⁵⁷ ICC-01/12-01/18-789-Conf-AnxA, para. 63(i) and (ii). Each item of evidence which the Prosecution seeks to introduce into evidence through the present application may be accessed by clicking on the ERN listed in Annex A, which is hyperlinked to the item of evidence in eCourt, as authorised by the Chamber in its email of 28 May 2020 13:38.

30. The Prosecution identified the Proposed Experts as appropriate witnesses for the procedure under rule 68(3) of the Rules.⁵⁸

31. The material that the Prosecution seeks to introduce for each of the Proposed Experts, set out herein, is relevant, probative and reliable. The Proposed Experts will be asked to attest to the authenticity and accuracy of their reports at the beginning of their testimony⁵⁹ and to confirm their availability and willingness to be examined by the Parties, Legal Representatives if applicable, and the Chamber. Each witness will be asked whether they consent to the introduction of their materials into evidence. The introduction of the Proposed Experts' reports and associated material is not prejudicial to the rights of the Accused.

P-0064

32. The Prosecution seeks to introduce, in full, P-0064's reports, which, as addressed above, are relevant, probative and reliable.

33. It also seeks to introduce into evidence the materials necessary to establish his expertise, namely his *curriculum vitae*⁶⁰ and the Prosecution's letter of instructions.⁶¹

34. Further, the Prosecution seeks to introduce in full the material associated to P-0064's reports, as set out in the chart contained in Annex A to this application. Section I of the chart identifies the reports which the Prosecution seeks to introduce into evidence. These reports include P-0064's explanations regarding the material associated with his reports which the Prosecution also seeks to introduce into evidence.

⁵⁸ In accordance with ICC-01/12-01/18-789-AnxA, para. 62, the Prosecution provided the Prosecution List of Witnesses on 15 April 2020, in which it indicated its intention to apply for the introduction of their evidence under rule 68(3) of the Rules in ICC-01/12-01/18-740-Conf-AnxA .

⁵⁹ ICC-01/12-01/18-789-AnxA, para.65. report

⁶⁰

⁶¹

35. Section II of Annex A lists 32 items associated with P-0064's first report [REDACTED] and 15 items associated to his second report [REDACTED], which the Prosecution also seeks to introduce into evidence. Seven of those documents are correspondence between the Prosecution and P-0064 and contain the letters of instruction to P-0064, their annexes, an amended chart sent by P-0064 with satellite coordinates, and P-0064's *curriculum vitae*. The remainder of the items are satellite imagery of Timbuktu from [REDACTED] [REDACTED] Google Earth photographs annotated by the Prosecution to indicate the locations of interest to be analysed. These items were analysed or used by Witness P-0064 in his report, and are relevant to the case against the Accused. Brief summaries of the content of each item are provided in Section II of the chart contained in Annex A.

36. Based on past practice, the Prosecution estimates that it will require in total an hour for the examination-in-chief of P-0064: namely, approximately 15 minutes for the formalities associated with the introduction of his reports and associated exhibits, and an additional 45 minutes to conduct a streamlined supplementary examination to elicit his methodology. The introduction of P-0064's evidence would reduce the length of his examination-in-chief by half.⁶²

P-0635

37. The Prosecution seeks to introduce, in full, P-0635's report and its addendum, as well as the eight annexes attached to it (containing technical information on the items analysed and providing elements for the comparison analysis), which, as addressed above, are relevant, probative and reliable.

⁶² The two hours originally estimated for this witness' examination-in-chief is based on the assumption that P-0064's reports could be submitted under rule 68(3). The Prosecution presently tries to further limit, in the present application, the examination in chief to an hour.

38. It also seeks to introduce into evidence the materials necessary to establish her expertise, namely her *curriculum vitae*⁶³ and the Prosecution's letter of instruction and its annex,⁶⁴ which are listed in Section II of Annex B.

39. Section III of Annex B lists other materials necessary to understand Witness P-0635's reports, but which the Prosecution does not seek to introduce into evidence. These are all the items analysed in P-0635's reports that the Prosecution seeks to introduce, [REDACTED] the seven sites of interest mentioned *supra*.

40. Based on past practice, the Prosecution estimates that it will require in total one hour and 40 minutes for the examination-in-chief of P-0635: namely, approximately 30 minutes for the formalities associated with the introduction of her reports and associated exhibits, and an additional one hour 10 minutes to conduct a streamlined supplementary examination to essentially elicit her methodology. The introduction of P-0635's evidence would reduce the length of her examination-in-chief almost by half.⁶⁵

P-0075

41. The Prosecution seeks to introduce, in full, Witness P-0075's reports, which, as addressed above, are relevant, probative and reliable. The materials necessary to establish his expertise, namely his *curriculum vitae*, and the Prosecution's letter of instructions, are included in some reports themselves, in Section I of Annex C, or listed in Section II of Annex C.

42. Further, the Prosecution seeks to introduce the material associated with P-0075's reports, as set out in the chart contained in Section II of Annex C to this

⁶³ [REDACTED]

⁶⁴ [REDACTED]

⁶⁵ The three hours originally estimated for this witness' examination-in-chief was based on the assumption that P-0635's report and addendum could be submitted under rule 68(3). The Prosecution presently tries to further limit, in the present application, the examination in chief to an hour 40 minutes.

application. Section I of the chart identifies the reports which the Prosecution seeks to introduce into evidence. These reports include P-0075's explanations regarding the material associated with his reports which the Prosecution also seeks to introduce into evidence.

43. Section II of Annex C lists the material associated with P-0075's report which the Prosecution also seeks to introduce into evidence. In addition to letters of instruction, these items are: (i) forensic copies of [REDACTED] [REDACTED] [REDACTED], a [REDACTED] and a [REDACTED] containing the files to be analysed; (ii) documents containing the logical extraction conducted in this process and (iii) documents containing the metadata or other information retrieved from the files.

44. These items served as the basis of P-0075's analysis, and are relevant to the case against the Accused. Brief summaries of the content of each item and its link to P-0075's reports, are provided in the chart contained in Section II of Annex C.

45. Section III of Annex C lists other materials necessary to understand Witness P-0064's reports, but which the Prosecution does not seek to introduce into evidence. These are all the items analysed in P-0075's reports that the Prosecution seeks to introduce. Section III also contains the physical media containing the material and two contact notes with P-0075.

46. Based on past practice, the Prosecution estimates that it will require in total two hours 10 minutes for the examination-in-chief of P-0075: namely, approximately thirty to forty-five minutes for the formalities associated with the introduction of his reports and associated exhibits, and an additional one hour 25 minutes to conduct a streamlined supplementary examination to elicit further details on the methodology

he used in preparing his report. The introduction of P-0075's evidence would reduce the length of his examination-in-chief by almost half.⁶⁶

Proposed procedure for the introduction of the Proposed Experts' materials

47. Should this application be granted, the Prosecution submits that there will be no need to read into evidence the reports as the witnesses will be asked to confirm their accuracy and to provide corrections or amendments, if any.

48. During witness preparation, the Prosecution will ask the Proposed Experts, *inter alia*, to review their reports and associated material, advise of any corrections or clarifications they wish to make, and to confirm the accuracy of their reports.⁶⁷ In accordance with the Witness Preparation Protocol this session will be video-recorded and the Prosecution will disclose a log of the session clearly indicating any changes or corrections which the witnesses make.⁶⁸

49. When the Proposed Experts appears in court, the Prosecution will seek to elicit, in principle by way of neutral questions, any clarifications noted by the witnesses during witness preparation.⁶⁹ The Prosecution will then ask the witnesses whether they have any further changes or clarifications to make to their reports and to confirm their consent to be questioned by the Parties and the Chamber.

50. In terms of further procedure, after tendering the reports, with any changes or clarifications noted on the record, and the associated material, the Prosecution will then conduct a supplementary examination of the Proposed Experts as outlined above.

⁶⁶ The four hours originally estimated for this witness' examination-in-chief was based on the assumption that P-0075's reports could be submitted under rule 68(3). The Prosecution presently tries to further limit, in the present application, the examination in chief to 2 hours 10 minutes.

⁶⁷ ICC-01/12-01/18-666-Anx, para.18-19.

⁶⁸ ICC-01/12-01/18-666-Anx, para.12-15, 31.

⁶⁹ ICC-01/12-01/18-666-Anx, para. 50.

Request to allow amendment of the list of evidence with one [REDACTED] and two forensic documents analysed or used by Witness P-0075 under regulation 35 of the Regulations

51. The Prosecution further seeks pursuant to regulation 35 of the Regulations authorisation to amend its list of incriminatory evidence by adding one [REDACTED]⁷⁰ and two forensic documents⁷¹ analysed or used by Witness P-0075 in preparing associated forensic reports. More specifically, these documents are:

- [REDACTED]: The [REDACTED]
[REDACTED]
[REDACTED]
[REDACTED].⁷² The forensic copy of [REDACTED] was disclosed to the Defence⁷³ as well as the relevant files contained therein. The files analysed by P-0075 [REDACTED] are listed in Annex C.⁷⁴
- [REDACTED]: The forensic copy [REDACTED]⁷⁵ [REDACTED]
[REDACTED] The [REDACTED] was disclosed to the Defence⁷⁶ as well as the relevant files contained therein. The files analysed by P-0075 contained in this forensic copy are listed in Annex C.⁷⁷
- [REDACTED] The physical item containing the forensic copies of [REDACTED]
[REDACTED]⁷⁸ as well as the forensic copy of [REDACTED]
[REDACTED].⁷⁹ As mentioned above, the forensic copy of [REDACTED] and [REDACTED]

⁷⁰ [REDACTED]

⁷¹ [REDACTED]

⁷² [REDACTED]

⁷⁴ See, Annex C, Section III.B.(i) [REDACTED].

⁷⁵ [REDACTED]

⁷⁶ [REDACTED]

⁷⁷ See, Annex C, Section III.B.(ii) [REDACTED].

⁷⁸ [REDACTED]

⁷⁹ [REDACTED]

is no undue prejudice to the Defence because it has already received this material in a different format as well as the relevant material contained therein.

Conclusion

55. Witnesses P-0064, P-0635 and P-0075 are experts in the subject matters to which their proposed testimony relate. The content of their reports falls within the scope of their expertise and their proposed testimony may assist the Chamber. Granting the application to introduce their reports and associated material as requested in this application would not be prejudicial to the rights of the Accused and it would enhance the expeditiousness of the proceedings by reducing the length of the Proposed Experts' examination-in-chief as set out above.

56. For the foregoing reasons, the Prosecution asks that the Chamber grant its application.



Fatou Bensouda, Prosecutor

Dated this 1 June 2020

At The Hague, The Netherlands