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**International
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Court**



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TRIAL CHAMBER V

Before: Judge Bertram Schmitt, Presiding Judge
Judge Péter Kovács
Judge Chang-ho Chung

SITUATION IN THE CENTRAL AFRICAN REPUBLIC II

**IN THE CASE OF
*THE PROSECUTOR v. ALFRED YEKATOM AND
PATRICE-ÉDOUARD NGAÏSSONA***

Public

**Public Redacted Version of “Common Legal Representatives’ Joint Response to
the ‘Second Yekatom Defence Motion for Interim Release’”
(ICC-01/14-01/18-616-Conf)**

Source: Common Legal Representatives of Victims

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

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I. INTRODUCTION

1. The Common Legal Representative of the Former Child Soldiers and the Common Legal Representatives of the Victims of Other Crimes (jointly the “Common Legal Representatives”) hereby file their joint response to the “Second Yekatom Defence Motion for Interim Release” (the “Defence Motion” or the “Motion”).¹

2. The Common Legal Representatives submit that the detention of Mr Yekatom should be maintained as the conditions set out in article 58(1) of the Rome Statute (the “Statute”) continue to be met. The Defence Motion requesting interim release in Belgium rather than in the Central African Republic (“CAR”) is the only significant development since Trial Chamber V’s (the “Trial Chamber” or the “Chamber”) last decision in the matter. However, this development does not fulfil the requirement of “changed circumstances” pursuant to article 60(3) of the Statute because it does not have a bearing on the conditions under article 58(1) of the Statute.

3. Interim release in Belgium rather than in CAR and other conditions proposed by the Defence are not sufficient to mitigate Mr Yekatom’s flight risk or the risk to the safety of the victims and witnesses, and to ensure the preservation of the evidence and the integrity of the proceedings.

4. Finally, the Common Legal Representatives argue that interim release in Belgium is not appropriate given the set start date of the trial and in light of other important factors, including the onerous burden it would impose on the Court and the volatility of the health situation in Belgium and The Netherlands caused by the COVID-19 crisis.

¹ See the “Second Yekatom Defence Motion for Interim Release”, [No. ICC-01/14-01/18-603-Conf](#), 27 July 2020 (the “Defence Motion” or the “Motion”). A public redacted version was filed on the same date as [No. ICC-01/14-01/18-603-Red](#).

II. PROCEDURAL BACKGROUND

5. On 11 November 2018, Pre-Trial Chamber II (the “Pre-Trial Chamber”) issued the “Warrant of Arrest for Alfred Yekatom”.²

6. On 11 December 2019, the Pre-Trial Chamber issued the Decision Confirming the Charges.³

7. On 3 March 2020, the Defence for Mr Yekatom filed an application for interim release (the “First Application for Interim Release”).⁴

8. On 16 March 2020, the Common Legal Representatives⁵ and the Prosecution⁶ filed their responses to the First Application for Interim Release.

9. On 14 April 2020, the Registry transmitted the observations of the Kingdom of the Netherlands and the Central African Republic on the interim release of Mr Yekatom.⁷

10. On 28 April 2020, the Trial Chamber issued the “Decision on the Yekatom Defence Application for Interim Release” in which it rejected the application (the “Decision on Yekatom’s First Application for Interim Release”).⁸

² See the “Warrant of Arrest for Alfred Yekatom” (Pre-Trial Chamber II), No. ICC-01/14-01/18-1-US-Exp, 11 November 2018. A public redacted version was issued on 17 November 2018 as [No. ICC-01/14-01/18-1-Red](#).

³ See the “Decision on the confirmation of charges against Alfred Yekatom and Patrice-Edouard Ngaïssona” (Pre-Trial Chamber II), No. ICC-01/14-01/18-403-Conf, 11 December 2019. A public redacted version was issued on 20 December 2019 as [No. ICC-01/14-01/18-403-Red](#). A corrected confidential and corrected public redacted version were issued on 14 May 2020 as [No. ICC-01/14-01/18-403-Conf-Corr](#) and [No. ICC-01/14-01/18-403-Red-Corr](#) respectively.

⁴ See the “Yekatom Defence Application for Interim Release”, [No. ICC-01/14-01/18-438](#), 3 March 2020.

⁵ See the “Common Legal Representatives’ Joint Response to the “Yekatom Defence Application for Interim Release”, [No. ICC-01/14-01/18-450](#), 16 March 2020.

⁶ See the “Prosecution’s Response to YEKATOM’s Request for Interim Release”, [No. ICC-01/14-01/18-452](#), 16 March 2020.

⁷ See the “Transmission of observations from the Kingdom of the Netherlands and the Central African Republic on interim release of Alfred Yekatom”, [No. ICC-01/14-01/18-478](#), 14 April 2020. The observations are annexed in two confidential annexes, see [No. ICC-01/14-01/18-478-Conf-AnxI](#) and [No. ICC-01/14-01/18-478-Conf-AnxII](#).

11. On 16 July 2020, the Trial Chamber issued the “Decision Setting the Commencement Date of the Trial”, deciding that the trial will commence on 9 February 2021.⁹

12. On 27 July 2020, the Defence filed its Motion.¹⁰

13. On 29 July 2020, the Trial Chamber issued the “Order Requesting Observations from relevant States on Interim Release”, inviting Belgium and The Netherlands to submit any observations on the Defence Motion by 19 August 2020.¹¹

III. CLASSIFICATION

14. Pursuant to regulation 23bis (1) and (2) of the Regulations of the Court, the present submission is classified as confidential, since it refers to the content of documents likewise classified as confidential. A public redacted version will be filed in due course.

IV. SUBMISSIONS

A. Applicable law

15. Article 60(3) of the Statute provides that the Pre-Trial Chamber shall periodically review its decision on the release or continued detention of the person concerned and, following the review, amend said decision “*if it is satisfied that changed*

⁸ See the “Decision on the Yekatom Defence Application for Interim Release” (Trial Chamber V), [No. ICC-01/14-01/18-495-Conf-Red](#), 28 April 2020 (the “Decision on Yekatom’s First Application for Interim Release”). On 24 July 2020, a second redacted version and a public redacted version were issued as [No. ICC-01/14-01/18-495-Conf-Red2](#) and [No. ICC-01/14-01/18-495-Red3](#) respectively.

⁹ See the “Decision Setting the Commencement Date of the Trial” (Trial Chamber V), [No. ICC-01/14-01/18-589](#), 16 July 2020.

¹⁰ See the Defence Motion, *supra* note 1.

¹¹ See the “Order Requesting Observations from relevant States on Interim Release” (Trial Chamber V), [No. ICC-01/14-01/18-608](#), 29 July 2020.

circumstances so require".¹² The scope of such a periodic review is, however, of a rather limited nature and must be distinguished from the review provided for under article 60(2) of the Statute. The latter provision states that the person shall be kept in custody "[i]f the Pre-Trial Chamber is satisfied that the conditions set forth in article 58, paragraph 1, are met".¹³ In contrast, the review under article 60(3) does not involve a *de novo* assessment of the requirements of article 58(1) of the Statute, but is limited to an examination of the "changed circumstances" test.¹⁴

16. The Appeals Chamber has explained that the requirement of "changed circumstances" under article 60(3) of the Statute "*imports either a change in some or all of the facts underlying a previous decision on detention, or a new fact satisfying a Chamber that a modification of its prior ruling is necessary*".¹⁵ Accordingly, the relevant Chamber must "*revert to the ruling on detention to determine whether there has been a change in the circumstances that have a bearing on the conditions under article 58(1) of the Statute*".¹⁶

17. The Appeals Chamber has further held that in considering whether changed circumstances require a modification of a previous ruling on detention under article

¹² See article 60(3) of the Statute.

¹³ See article 60(2) of the Statute.

¹⁴ See the "Second Decision on Bosco Ntaganda's Interim Release" (Pre-Trial Chamber II), [No. ICC-01/04-02/06-284](#), 17 March 2014, para. 25.

¹⁵ See the "Judgment on the appeal of the Prosecutor against Pre-Trial Chamber II's 'Decision on the Interim Release of Jean-Pierre Bemba Gombo and Convening Hearings with the Kingdom of Belgium, the Republic of Portugal, the Republic of France, the Federal Republic of Germany, the Italian Republic, and the Republic of South Africa'" (Appeals Chamber), [No. ICC-01/05-01/08-631-Red OA2](#), 2 December 2009, para. 60. See also the "Judgment on the appeal of Mr Jean-Pierre Bemba Gombo against the decision of Trial Chamber III of 2 September 2011 entitled 'Decision on the "Demande de mise en liberté de M. Jean-Pierre Bemba Gombo afin d'accomplir ses devoirs civiques en République Démocratique du Congo"'" (Appeals Chamber), [No. ICC-01/05-01/08-1722 OA8](#), 9 September 2011, para. 30; and "Decision on the review of the detention of Mr Jean-Pierre Bemba Gombo pursuant to Rule 118(2) of the Rules of Procedure and Evidence" (Trial Chamber III), [No. ICC-01/05-01/08-743](#), 1 April 2010, para. 26.

¹⁶ See the "Judgment on the appeal of Mr Jean-Pierre Bemba Gombo against the decision of Trial Chamber III of 28 July 2010 entitled 'Decision on the review of the detention of Mr Jean-Pierre Bemba Gombo pursuant to Rule 118(2) of the Rules of Procedure and Evidence'" (Appeals Chamber), [No. ICC-01/05-01/08-1019 OA4](#), 19 November 2010, para. 52 (emphasis added). See also the "Judgment on the appeal of Mr Jean-Pierre Bemba Gombo against the decision of Trial Chamber HI of 27 June 2011 entitled 'Decision on Applications for Provisional Release'" (Appeals Chamber), [No. ICC-01/05-01/08-1626-Red OA7](#), 19 August 2011, para. 61.

60(3) of the Statute, the first consideration is “*whether the alternative risks under article 58(1)(b) of the Statute remain present so as to justify the continued detention of the person concerned. If they do not, the person must be released, with or without conditions, pursuant to article 60(3) of the Statute. Once this is established, there is no need for any further inquiry into other factors that may justify release. It is only if the article 58(1)(b) risks remain present to a degree which potentially justifies further detention that other factors may need to be balanced against these risks, as articulated above*”.¹⁷

18. According to the constant jurisprudence of the Court, change in circumstances must be demonstrated on a concrete basis,¹⁸ considering all available information, not only the arguments of the detained person.¹⁹

B. The Defence Motion fails to meet the relevant legal criteria

1) Interim release in Belgium does not fulfil the requirement of “changed circumstances”

19. The Common Legal Representatives argue that the Defence’s request for Mr Yekatom to be released in Belgium, rather than in CAR, does not fulfil the requirement of “changed circumstances” pursuant to article 60(3) of the Statute. Indeed, it is submitted that interim release in Belgium does not have a bearing on the conditions under article 58(1) of the Statute. Even if released in Belgium, the following recent findings of the Trial Chamber are still valid:

¹⁷ See the Judgment on the appeals against Pre-Trial Chamber II’s decisions regarding interim release in relation to Aimé Kilolo Musamba, Jean-Jacques Mangenda, Fidèle Babala Wandu, and Narcisse Arido and order for reclassification (Appeals Chamber), [No. ICC-01/05-01/13-969 OA5 OA6 OA7 OA8 OA9](#), 29 May 2015, para. 48.

¹⁸ See the “Public Redacted Version of the ‘Decision on Applications for Provisional Release’ of 27 June 2011” (Trial Chamber III), [No. ICC-01/05-01/08-1565-Red](#), 16 August 2011, para. 58 *citing* the “Judgment on the appeal of Mr. Jean-Pierre Bemba Gombo against the decision of Pre-Trial Chamber III entitled ‘Decision on application for interim release’” (Appeals Chamber), [No. ICC-01/05-01/08-323 OA](#), 16 December 2008, para. 55. See also the “Judgment on the appeal of Mr. Thomas Lubanga Dyilo against the decision of Pre-Trial Chamber I entitled ‘Décision sur la demande de mise en liberté provisoire de Thomas Lubanga Dyilo’” (Appeals Chamber), [No. ICC-01/04-01/06-824 OA 7](#), 13 February 2007, para. 138.

¹⁹ See the “Decision on Mr Gbagbo’s Detention” (Trial Chamber I), [No. ICC-02/11-01/15-846](#), 10 March 2017, para. 11.

- i. Considering the grave nature of the charges and the role attributed to Mr Yekatom, he would have an incentive to flee, given the potential for a high sentence in case of a conviction, especially following the confirmation of charges;²⁰
- ii. Given his position as a member of the CAR parliament during his arrest, Mr Yekatom might still exercise influence over his supporters in his immediate and extended community in the CAR;²¹
- iii. The Registry and the CAR authorities consider that the political and security dynamics in the CAR have the potential to negatively impact the ability or willingness of victims to participate in the Court's proceedings and Mr Yekatom potentially continues to exercise influence in the community to the detriment of the victims' safety.²²

2) *The conditions set forth in article 58(1) of the Statute continue to be met*

20. The Common Legal Representatives reiterate their arguments in relation to the fulfilment of the conditions set out in article 58(1) of the Statute.²³ They highlight that the conditions under article 58(1)(b) of the Statute are in the alternative - if one is satisfied, the other conditions do not have to be addressed or fulfilled.²⁴

21. *First*, the Common Legal Representatives reiterate that it is settled case law that “[i]f a person is charged with grave crimes, the person might face a lengthy prison sentence, which may make the person more likely to abscond”.²⁵ The Defence advances that

²⁰ See the Decision on Yekatom's First Application for Interim Release, *supra* note 8, para. 24.

²¹ *Idem*, para. 25.

²² *Idem*, paras. 29-30.

²³ See the “Common Legal Representatives’ Joint Response to the ‘Yekatom Defence Application for Interim Release’”, *supra* note 5.

²⁴ See the “Public Redacted Version of Judgment on the appeal of the Prosecutor against Pre-Trial Chamber II’s ‘Decision on the Interim Release of Jean-Pierre Bemba Gombo and Convening Hearings with the Kingdom of Belgium, the Republic of Portugal, the Republic of France, the Federal Republic of Germany, the Italian Republic and the Republic of South Africa’”, *supra* note 15, para. 89.

²⁵ See the “Judgment on the appeal of Mr. Thomas Lubanga Dyilo against the decision of Pre-Trial Chamber I entitled ‘Décision sur la demande de mise en liberté provisoire de Thomas Lubanga Dyilo’”, *supra* note 18, para. 136. See also, the “Judgment on the appeal of Mr. Jean-Pierre Bemba

“[a]part from the fact that he is facing a long sentence if convicted, a circumstance that applies to every accused before this Court, there are no facts or circumstances that would support a conclusion that Mr. Yekatom would have the means and resources to flee from Belgium”.²⁶ However, the Defence offers no reason for the Chamber to depart from the constant jurisprudence of the Court on this point.

22. The Defence also refers to a decision issued by the Appeals Chamber in the *Gbagbo and Blé Goudé* case in order to argue that interim release can be granted even where there is a flight risk due to the severe penalties faced by the accused, because said risk could be mitigated by the imposition of conditions.²⁷ The Common Legal Representatives posit that reference to the *Gbagbo and Blé Goudé* case is inapposite because in that decision, interim release was being discussed after the termination of the case, while in the present case Mr Yekatom still faces very serious charges.

23. Furthermore, the Common Legal Representatives argue that the setting of the date of commencement of the trial by the Trial Chamber is a factor that makes Mr Yekatom more likely to abscond. It would thus be inappropriate to grant interim release right after setting a date for the commencement of trial.

24. *Second*, the Trial Chamber has held that, given his position as a member of the CAR parliament during his arrest, Mr Yekatom might still exercise influence over his supporters in his immediate and extended community in the CAR.²⁸ The Common Legal Representatives fail to see how being released in Belgium rather than in CAR would alter or lessen the Accused’s influence over his supporters, nor do they believe that his influence could have dissipated in the three months since the Chamber’s first

Gombo against the decision of Pre-Trial Chamber III entitled 'Decision on application for Interim release', *supra* note 18, para. 55; and the “Judgment on the appeal of the Prosecutor against Pre-Trial Chamber II’s ‘Decision on the Interim Release of Jean-Pierre Bemba Gombo and Convening Hearings with the Kingdom of Belgium, the Republic of Portugal, the Republic of France, the Federal Republic of Germany, the Italian Republic, and the Republic of South Africa’”, *supra* note 15, para. 70.

²⁶ See the Defence Motion, *supra* note 1, para. 17.

²⁷ *Idem*, para. 18.

²⁸ See the Decision on Yekatom’s First Application for Interim Release, *supra* note 8, para. 25.

decision on continued detention. Given the various means of communication that would be available to Mr Yekatom if released in Belgium, there remains a real risk that he would continue to exercise influence over his supporters, even from abroad.

25. The Trial Chamber further noted that the CAR authorities had stated that [REDACTED].²⁹ The Common Legal Representatives contend that it would be disingenuous to suggest that Mr Yekatom could not exert influence over his supporters simply because he would physically be in a different country since it is evident that he can exert influence remotely.

26. The Common Legal Representatives recall in this regard that [REDACTED].³⁰

27. It is submitted that if released, whether in Belgium or in CAR, [REDACTED]. The Common Legal Representatives contend that there would therefore be a risk that Mr Yekatom *“would, directly, or indirectly with the help of others, exert pressure on the witnesses, thus obstructing or endangering the court proceedings”*.³¹

28. The Common Legal Representatives argue that [REDACTED] are evidence that he has the ability to negatively influence his supporters without being physically present in CAR. It is evident that Mr Yekatom can indeed influence and instruct his supporters using any communication technology; [REDACTED]. The Defence’s argument that the *“concerns would be significantly mitigated were Mr. Yekatom to be released to reside in Belgium, where he has no supporters, no influence, and no means to interfere with victims or witnesses”*³² is thus invalid.

29. In light of the above, the Common Legal Representatives aver that, if released in Belgium, Mr Yekatom will in fact have more possibilities of [REDACTED]

²⁹ *Idem*, para. 34.

³⁰ [REDACTED].

³¹ See the “Decision on the Application for the interim release of Thomas Lubanga Dyilo” (Pre-Trial Chamber I, Single Judge), [No. ICC-01/04-01/06-586-tEN](#), 18 October 2006, p. 6.

³² See the Defence Motion, *supra* note 1, para. 21.

communication with his supporters in CAR than in detention in The Hague. He will thus have the possibility to coordinate his supporters' actions, even remotely, which may lead to the influence of or threat to victims and witnesses.

30. *Third*, as the commencement of the trial nears, the Prosecution is continuously and increasingly disclosing information relating to witnesses, some of whom have a dual status as victims.³³ If anything, the fact that Mr Yekatom has now had access to more information about more victims and witnesses militates *in favour* of his continued detention, rather than in favour of interim release. The Common Legal Representatives therefore submit that, in the context of the upcoming trial and the disclosure of witness identities, Mr Yekatom's continued detention is imperative in mitigating the risks to victims and witnesses, and in ensuring the preservation of the evidence and the integrity of the proceedings.

31. Furthermore, the Common Legal Representatives contend that, in light of the upcoming presidential elections in CAR, Mr Yekatom's interim release would be a destabilising factor in an already tense political climate and would be perceived as threatening and discouraging by the victims. Additionally, it might encourage Mr Yekatom's supporters in CAR to either influence witnesses or commit further crimes to which he will be able to contribute remotely.

32. As noted by the CAR authorities, [REDACTED].³⁴ Releasing the Accused would therefore have an irremediable impact on the security and safety of victims and witnesses, the preservation of evidence and the upcoming trial. It would put the lives of witnesses and victims at risk, contrary to the Court's duty under article 68 of

³³ See the "Prosecution's Submission in Compliance of the Single Judge's 'Order to provide a Preliminary Witness List', ICC-01/14-01/18-528", [No. ICC-01/14-01/18-553](#), 15 June 2020. See also the "Decision Setting the Commencement Date of the Trial", *supra* note 9, para. 6: the Prosecution is to provide a Provisional Witness List with anticipated testimony summaries by 31 August 2020.

³⁴ See the "Transmission of observations from the Kingdom of the Netherlands and the Central African Republic on interim release of Alfred Yekatom", Annex II, *supra* note 7, para. 11.

the Statute to take appropriate measures to protect the safety, physical and psychological well-being, dignity and privacy of victims and witnesses.³⁵

33. In fact, the Defence's mere assertion that Mr Yekatom will refrain from contacting victims and witness³⁶ is grossly insufficient to mitigate the risk to the safety of said individuals.

34. Finally, the Defence also compares the length of detention of other detainees to argue that the Court has a history of "*grave injustices*" when it comes to interim release.³⁷ The Common Legal Representatives argue that this cannot form an argument in favour of granting interim release to Mr Yekatom. Decisions on provisional release are taken based on the individual situation of each detainee, and Mr Yekatom's case cannot be used to correct any perceived "*black mark on the human rights record of the ICC*".³⁸

C. Interim release in Belgium is inappropriate in light of other important factors

35. Apart from the various legal hurdles described above, interim release in Belgium as requested by the Defence is also inappropriate in light of the following important factors.

36. *First*, even if the Trial Chamber were inclined to grant the Motion, release in Belgium is not a given or a right. Pre-Trial Chamber II in the *Kilolo et al.* case has held with regards to the Framework Agreement between the Court and the Kingdom of Belgium that "*it is to be noted that the Agreement, far from witnessing to an unconditional availability and willingness on the part of the Kingdom of Belgium to accept that detainees*

³⁵ See the "Common Legal Representatives' Joint Response to the "Yekatom Defence Application for Interim Release", *supra* note 5, paras. 50-52.

³⁶ See the Defence Motion, *supra* note 1, para. 21.

³⁷ *Idem*, para. 27.

³⁸ *Ibid.*

from the Court be released on its territory or, even less, establishing an obligation on their part to do so, makes such acceptance explicitly conditional upon an assessment to be made “au cas-par-cas” on the basis of the specific appreciation that the Belgian authorities may make of a given case. As stated by the Belgian authorities, the Framework Agreement ‘ne peut toutefois nullement modifier les règles applicables en la matière, soit notamment l’article 60-3 du Statut de Rome’; furthermore, it cannot by and itself be considered as the source of a Belgian suspect’s ‘right’ to be accepted on that country’s territory in the context of interim release”.³⁹

37. *Second*, the Common Legal Representatives further contend that if released in Belgium, Mr Yekatom could possibly travel within the Schengen area without the need of identification documents, which would increase the risk of absconding from the jurisdiction of the Court.⁴⁰

38. *Third*, if released in Belgium as requested by the Defence, Mr Yekatom will need to travel between Belgium and The Hague whenever required pending trial. This might give rise to security issues, and will certainly put an additional burden on the Court in terms of travel arrangements and costs. Furthermore, in its Motion, the Defence states that if Mr Yekatom were to be released in Belgium, “[i]n person consultations could take place regularly, since Belgium is only a short train ride from The Hague for defence team members”.⁴¹ This would put a further onerous burden on the Court as the travel costs of the defence team members would need to be covered by the Court’s legal aid scheme. The Common Legal Representatives recall in this

³⁹ See the “Decision on the first review of Aimé Kilolo Musamba’s detention pursuant to article 60(3) of the Statute” (Pre-Trial Chamber II, Single Judge), [No. ICC-01/05-01/13-611](#), 5 August 2014, para. 13.

⁴⁰ See the “Judgment on the appeal of Mr Aime Kilolo Musamba against the decision of Pre-Trial Chamber II of 14 March 2014 entitled ‘Decision on the ‘Demande de mise en liberte provisoire de Maitre Aime Kilolo Musamba’” (Appeals Chamber), [No. ICC-01/05-01/13-558 OA 2](#), 11 July 2014, para. 107.

⁴¹ See the Defence Motion, *supra* note 1, para. 26.

regard that the Court does not have an obligation to make excessive expenditures in order to facilitate the conditional release of an accused.⁴²

39. Finally, the Common Legal Representatives also alert to the volatility of the health situation in Belgium and The Netherlands due to the COVID-19 crisis. Both countries are currently experiencing a surge in coronavirus infections,⁴³ which means that new travel restrictions or lockdowns cannot be excluded. In case the health situation worsens, the Accused might be prevented from attending hearings if he were to be provisionally released in Belgium.

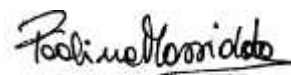
40. In light of the above, it is clear that the present circumstances are not conducive to Mr Yekatom's interim release in Belgium.

V. CONCLUSION

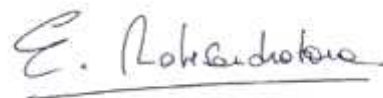
41. For the foregoing reasons, the Common Legal Representatives respectfully request the Trial Chamber to reject the Defence Motion.



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⁴² See the "Decision on Mr Gbagbo's Detention", *supra* note 19, para. 22.

⁴³ See Rijksinstituut voor Volksgezondheid en Milieu, [Number of COVID-19 infections continues to increase](#), 28 July 2020; and Info-coronavirus, [The number of new infections continues to increase](#), 28 July 2020.



Marie-Edith Douzima-Lawson

Common Legal Representatives
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Dated this 9th of September 2020

At The Hague (The Netherlands), Bangui (Central African Republic), La Rochelle
(France) and Saint Louis (Senegal)