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**International
Criminal
Court**

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TRIAL CHAMBER IX

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

SITUATION IN UGANDA

**IN THE CASE OF
*THE PROSECUTOR v. DOMINIC ONGWEN***

Public Redacted Version of ICC-02/04-01/15-1787-Conf

**CLRv Response to the
“Defence request to submit additional evidence for Trial Chamber IX’s
determination of the sentence”**

Source: Office of Public Counsel for 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 Victims participating at trial¹ (the “CLRv”) opposes the Defence request to submit additional evidence for sentencing purposes (the “Request”)² in the part asking to re-call witnesses who have already testified at trial and to call as witnesses some religious/traditional leaders.

2. Said proposed evidence is indeed either: (i) repetitive or cumulative of the evidence already in the record of the case; (ii) aiming at re-litigating matters already adjudicated by the Trial Chamber; or/and (iii) irrelevant to the determination of the sentence to be imposed upon Mr Ongwen.

3. Concerning the request to call some family members of Mr Ongwen, while leaving the matter to the discretion of the Chamber, the CLRv submits that the Chamber should only accept the most representative statements of one or two witnesses and said testimonies should be strictly confined to the factors identified in rule 145(1)(c) of the Rules of the Rules of Procedure and Evidence (the “Rules”), in the interest of the expeditiousness of the proceedings.

4. Finally, the CLRv asks the Chamber to disregard the submission concerning Dr. Abbo whose expert conclusions seem to have been misinterpreted by the Defence.

¹ See the “Decision on contested victims’ applications for participation, legal representation of victims and their procedural rights” (Pre-Trial Chamber II, Single Judge), [No. ICC-02/04-01/15-350](#), 27 November 2015, p.19; the “Decision on issues concerning victims’ participation” (Pre-Trial Chamber II, Single Judge), [No. ICC-02/04-01/15-369](#), 15 December 2015, pp. 10-11; the “Second decision on contested victims’ applications for participation and legal representation of victims” (Pre-Trial Chamber II, Single Judge), [No. ICC-02/04-01/05-384](#), 24 December 2015, pp. 20-22; and the “Decision on the ‘Request for a determination concerning legal aid’ submitted by the legal representatives of victims” (Trial Chamber IX, Single Judge), [No. ICC-02/04-01/15-445](#), 26 May 2016, para. 13.

² See the “Defence request to submit additional evidence for Trial Chamber IX’s determination of the sentence”, [No. ICC-02/04-01/15-1783-Conf](#), 26 February 2021 (the “Request”).

II. PROCEDURAL BACKGROUND

5. On 4 February 2021, the Trial Chamber (the “Chamber”) rendered its Judgment (the “Judgment”) declaring Mr Ongwen guilty of 61 charges of war crimes and crimes against humanity.³ The same day, the Chamber also issued the “Decision scheduling a hearing on sentence and setting the related procedural calendar” (the “Decision on the Sentencing Hearing”).⁴

6. On 26 February 2021, the Defence filed the Request.⁵

7. On 1 March 2021, the Defence filed an *Addendum* to the Request.⁶

III. LEVEL OF CLASSIFICATION

8. In accordance with regulation 23bis (2) of the Regulations of the Court, the present submission is filed confidential following the classification chosen by the Defence. A public redacted version will be filed in due course.

IV. SUBMISSIONS

9. At the outset, the CLRV recalls that in the Decision on the Sentencing Hearing, the Chamber stressed that:

[For any] proposed additional evidence, the parties/participants shall indicate how, in their submission, the evidence concerned relates to the factors under Article 78 of the Statute and Rule 145 of the Rules that the Chamber is mandated to consider in the

³ See the “Trial Judgment” (Trial Chamber IX), [No. ICC-02/04-01/15-1762-Conf](#), 04 February 2021 (the “Judgment”) (Public redacted version of the document was filed on the same day. [No. ICC-02/04-01/15-1762-Red](#)).

⁴ See the “Decision scheduling a hearing on sentence and setting the related procedural calendar”, [No. ICC-02/04-01/15-1763](#), 4 February 2021 (the “Decision on the Sentencing Hearing”).

⁵ See the Request, *supra* note 2.

⁶ See the “Defence Addendum to ‘Defence request to submit additional evidence for Trial Chamber IX’s determination of the sentence’, filed on 26 February 2021 as ICC-02/04-01/15-1783-Conf”, [No. ICC-02/04-01/15-1785](#), 01 March 2021 (the “Addendum”).

determination of the appropriate sentence to be imposed on Dominic Ongwen. In this regard, the Chamber emphasises that given the abundance of evidence of potential relevance to the sentence that has been presented at trial (and is thus already part of the record of the case), it expects that any additional evidence, especially oral evidence to be heard at the hearing on sentence, will be very limited. [...] The Chamber [may also] intervene in the selection and presentation of evidence in order to ensure the fair and expeditious conduct of the present proceedings”.⁷

10. In light of these instructions and of the relevant jurisprudence of the Court, the CLRV submits that the Defence’s proposals for additional evidence should be rejected in the part aiming at re-calling witnesses who have already sufficiently testified on matters found of limited value in the Judgement and/or aiming at re-litigating issues such as mental health and duress already adjudicated in the Judgment.

11. The CLRV submits that, given the nature of the sentencing stage of the proceedings, only evidence that is unique and goes beyond other evidence already available in the record of the case should be proposed by the parties and participants.⁸ Especially, when a party intends to recall a witness who have already appeared before the Chamber and was extensively examined by the parties and participants, the former must demonstrate “good cause” to recall said witness.⁹ No such good cause is shown by the Defence in relation to the request to re-call witnesses already heard by the Chamber.

12. Pursuant to article 76(2) of the Rome Statute (“Statute”), the sentencing hearing is part of the trial and thus judicial economy demands that recalling witnesses should be granted only in the most compelling circumstances where the evidence is of

⁷ See the Decision on the Sentencing Hearing, *supra* note 4, para. 6.

⁸ See the “Public redacted version of ‘Decision on requests to call witnesses in relation to sentencing and for increased monitoring of Mr Ntaganda’s contacts and scheduling the sentencing hearing’” (Trial Chamber VI), [No. ICC-01/04-02/06-2384-Red](#), 21 August 2019, paras. 15 and 40.

⁹ See the “Decision on requests to present additional evidence and submissions on sentence and scheduling the sentencing hearing” (Trial Chamber III), [No. ICC-01/05-01/08-3384](#), 4 May 2016, paras. 17-18.

significant probative value and not of a cumulative nature.¹⁰ Accepting repetitive¹¹ or overlapping¹² evidence would be disproportionate to the anticipated value (if any) of the proposed evidence¹³ and antithetical to the efficiency and expeditiousness of the proceedings.

A. *Request to Re-call Witnesses*

13. In particular, the CLRV opposes the Request in relation to:

1) *Re-calling Prof. Kristof Titeca (UGA-D26-P-0060) and the submission of documents UGA-D26-0015-1722 and UGA-D26-0015-1723*

14. The Defence proposes to re-call Prof. Kristof Titeca to testify about the personal circumstances of Mr Ongwen, his age, abduction, education and socio-economic conditions, the cosmology of the LRA and duress.¹⁴ The Defence also proposes to submit via the bar table documents UGA-D26-0015-1722 and UGA-D26-0015-1723 used by Prof. Titeca which are not currently in evidence.¹⁵ The Defence argues that these items relate to Mr Ongwen's mental state on the cosmological belief of the LRA, Kony's power over him and his constant state of duress while in captivity in the LRA.¹⁶

15. The CLRV recalls that Prof. Titeca already testified extensively on these matters during the presentation of evidence by the Defence.¹⁷ The expert report prepared and the live testimony given were properly assessed in the Judgment.¹⁸ In this regard, the

¹⁰ *Ibid.*, para. 18.

¹¹ *Ibid.*, para. 15.

¹² See the "Public redacted version of 'Preliminary ruling on prior recorded testimony pursuant to Rule 68(2)(b) in relation to sentencing'" (Trial Chamber VI), [No. ICC-01/04-02/06-2385-Red](#), 23 August 2019, paras. 22 and 32.

¹³ See the "Decision on Sentencing Witnesses and Setting an Article 76(2) Hearing" (Trial Chamber VII), [No. ICC-01/05-01/13-2025](#), 11 November 2016, para. 10.

¹⁴ See the Request, *supra* note 2, paras. 15-16.

¹⁵ *Ibid.*, para. 9.

¹⁶ *Ibid.*, para. 10.

¹⁷ See the transcript of the hearing held on 19 November 2018, No. [ICC-02/04-01/15-T-197](#).

¹⁸ See the Judgment, *supra* note 3, paras. 596 – 597.

Chamber concluded that, while the witness' testimony was candid, comprehensive and clear, his evidence was only of very limited value, especially given the abundance of direct evidence of witnesses who testified about cosmological space of the LRA.¹⁹

16. Furthermore, the CLRV submits that the proposal to recall Prof. Titeca and introduce said items into evidence aims at re-litigating matters that have already been adjudicated by the Chamber. Indeed, the latter explicitly found in the Judgment that the actions which Mr Ongwen took and which underline the crimes committed were free of threat of imminent death or imminent or continuing serious bodily harm and thus, that duress - as a ground excluding criminal responsibility under article 31(1)(d) of the Statute - is not applicable to him.²⁰ In the same vein, the Chamber never found that there were circumstances involving Mr Ongwen which fell short of constituting grounds for exclusion of criminal responsibility such as duress provided for in rule 145(2)(a)(i) of the Rules.

17. As a result, the Defence should not be allowed to contest the finding of the Chamber on duress in the pretence of presenting additional evidence on sentencing. Indeed, the sentencing stage is not a further opportunity for the parties to re-litigate the findings of the Chamber.²¹

2) *Re-calling Prof. Emilio Ovuga (UGA-D26-P-0042)*

18. The Defence proposes to re-call Prof. Emilio Ovuga to testify about the personal circumstances of Mr Ongwen, his age, education, socio-economic conditions, diminished capacity and duress.²² The CLRV posits that the most of the "new" expert report (discussing Mr Ongwen's abduction by the LRA, and [REDACTED] and duress)

¹⁹ *Idem*.

²⁰ See the Judgment, *supra* note 3, para. 2670.

²¹ See the "Decision on Sentencing Witnesses and Setting an Article 76(2) Hearing", *supra* note 13, para. 18 and the "Decision on requests to present additional evidence and submissions on sentence and scheduling the sentencing hearing", *supra* note 9, paras. 21 and 45.

²² See the Request, *supra* note 2, paras. 12 and 14.

is repetitive of the same issues already explored in Prof. Ovuga's previous report (made jointly with Dr. Dickens Akena).²³ In addition, Prof. Ovuga already testified extensively on these matters during the presentation of evidence by the Defence and during the rejoinder proceedings.²⁴

19. Moreover, in its Judgement, the Chamber fully assessed Prof. Ovuga's expert report and his testimony and concluded that Mr Ongwen is [REDACTED] as suggested by the Defence.²⁵ Most importantly, the Chamber never found that there were circumstances involving Mr Ongwen which fell short of constituting grounds for exclusion of criminal responsibility, namely, substantially diminished mental capacity or duress. As mentioned above, a party may not be permitted to re-litigate the merits of the case in the name of proposing additional evidence on sentencing.

3) *Re-calling Major Pollar Awich (UGA-D26-P-0133)*

20. The Defence proposes to re-call Major Pollar Awich to testify about the personal circumstances of Mr Ongwen, his age (both age of abduction and mental age), education, socio-economic conditions, diminished capacity and duress and delve further into the problems associated with child soldiers and former child soldiers returning from war.²⁶ Again, the CLRV notes that Major Awich already testified extensively on most of these matters during the presentation of the evidence by the Defence.²⁷ In the Judgment, the Chamber concluded that, while the witness testified in a straight-forward, open and concise manner, his testimony is not directly relevant to

²³ See Report for Sentence Mitigation, No. UGA-D26-0015-1878, pp. 2-10. See also Psychiatric Report, No. UGA-D26-0015-0004 and Second Psychiatric Report, No. UGA-D26-0015-0948.

²⁴ See the transcripts of the hearings held on 21 and 22 November 2019, No. [ICC-02/04-01/15-T-250-CONF-ENG ET](#) and No. [ICC-02/04-01/15-T-251-CONF-ENG ET](#) and on 28 and 29 November 2019, No. [ICC-02/04/01/05-T-254 ET WT](#) and [ICC-02/04-01/05-T-255 ET WT](#).

²⁵ See the Judgment, *supra* note 3, paras. 2475-2477, 2484, 2492-2493, 2518, 2538 and 2580.

²⁶ See the Request, *supra* note 2, paras. 18 and 19.

²⁷ See the transcripts of the hearings held on 26 and 28 February 2019, No. [ICC-02/04-01/15-T-203 ET WT](#) and No. [ICC-02/04-01/15-T-204 CT WT](#).

the disposal of the charges.²⁸ Moreover, abundance of reliable evidence is already before the Chamber in relation to problems associated with former child soldiers. Additionally, the Chamber never found that there were circumstances involving Mr Ongwen which fell short of constituting substantially diminished mental capacity or duress. This attempt to re-litigate the merits of the case must be rejected, once more.

21. Moreover, according to the Defence, Major Awich would discuss issues which should be taken into account as mitigating factors, found in the United Nations Standard Minimum Rules for the Administration of Juvenile Justice and local mechanisms for rehabilitative and restorative justice.²⁹ The CLRV submits that these matters have no relevance to the determination of the sentence of Mr Ongwen since, as found by the Chamber, he is no longer juvenile and the conduct relevant for the crimes he has been convicted for occurred many years after his abduction when he was an adult and in a commanding position within the LRA.³⁰ Furthermore, the legal framework of the Court, does not allow the Chamber to consider traditional or local mechanisms for rehabilitative and restorative justice when pronouncing itself on the sentence to be applied to a convicted person.

22. Pursuant to article 23, a person convicted by the Court may be punished only in accordance with the provisions of the Statute. In this regard, the Appeals Chamber held :

[...] the Statute and related provisions contain an exhaustive identification of the types of penalties that can be imposed against the convicted person and specify mandatory aggravating and mitigating circumstances as well as the parameters to be considered for the determination of the quantum of such penalties. The corresponding powers of a trial chamber are therefore limited to the identification of the appropriate penalty among the ones listed in the Statute and a determination of its quantum. No “inherent

²⁸ See the Judgment, *supra* note 3, para. 605.

²⁹ See the Request, *supra* note 2, para. 19.

³⁰ See the Judgment, *supra* note 3, para. 2592.

*powers” may be invoked to introduce unregulated penalties or sentencing mechanisms not otherwise foreseen in the legal framework of the Court [...].*³¹

23. In particular, article 77 of the Statute identifies only four types of penalty, including imprisonment, a term of life imprisonment, a fine and a forfeiture of proceeds, property and assets derived directly or indirectly from that crime. Therefore, the powers of the Chamber at the sentencing stage are limited to the identification of the appropriate penalty amongst these specific types of sanctions and a determination of its *quantum*.³² It follows that there is no room for administering penalties for a person convicted by the Court via local mechanisms for rehabilitative and restorative justice in Uganda. Thus, the proposed evidence is highly irrelevant to the determination of the sentence to be imposed upon Mr Ongwen.

4) *Re-calling Prof. Eric Awich Ochen (UGA-D26-P-0114)*

24. The Defence proposes to re-call Prof. Eric Awich Ochen, as an expert witness, to testify about the LRA’s practices of abduction, Mr Ongwen’s experiences during the early days after his abduction, his personal circumstances and his mental state/duress.³³ His expert report was not ready at the time of the filing of the Request.³⁴

25. Yet again, Prof. Ochen already testified extensively on most of these matters during the presentation of evidence by the Defence.³⁵ In the Judgment, the Chamber concluded that, while the witness testified in a straight-forward, open and concise manner, his testimony is not directly relevant to the disposal of the charges.³⁶

³¹ See the “Judgment on the appeals of the Prosecutor, Mr Jean-Pierre Bemba Gombo, Mr Fidèle Babala Wandu and Mr Narcisse Arido against the decision of Trial Chamber VII entitled “Decision on Sentence pursuant to Article 76 of the Statute” (Appeals Chamber), [No. ICC-01/05-01/13-2276-Red NM A6 A7 A8 A9](#), 8 March 2018, para. 77.

³² *Ibid.*, para. 3.

³³ See the Request, *supra* note 2, para. 23.

³⁴ *Ibid.*, para. 22.

³⁵ See the transcript of the hearing held on 31 October 2019, No. [ICC-02/04-01/15-T-247-ENG ET WT](#).

³⁶ See the Judgment, *supra* note 3, para. 607.

26. Moreover, the fact that Prof. Ochen was contracted late and would be submitting his report belatedly is not a justification for disregarding the time-limit set by the Chamber. In fact, the Chamber had previously issued an oral ruling with regards to Prof. Ochen which stated that: (i) he had been on the Defence's list of witnesses since June 2018 and thus, (ii) the Defence's request (made two days prior the appearance of the witness) to have him treated as an expert was manifestly untimely.³⁷ This plainly shows that the Defence had ample time to anticipate for the sentencing stage of the proceedings and facilitate Prof. Ochen's expert report in good time. Indeed, the aim of making an item of evidence available to the parties and participants for the purposes of the sentencing hearing is to place them in a position to fully present the arguments they consider relevant for said hearing.³⁸ Thus, the CLRV posits that the Defence failed to present any justifiable explanation as to why it was unable to obtain the expert report prior to the expiration of the relevant deadline.

B. Request in relation to religious leaders or organisations

27. The CLRV also opposes the Request in relation to the testimony and/or presentation of statements by traditional leaders and/or organisations. In particular:

5) *Testimony of Prime Minister of Ker Kwaro Acholi (UGA-D26-P-0160) and Statement by the Ker Kwaro Acholi*

28. The Defence proposes to call Mr Ambrose Olaa, the Prime Minister of Ker Kwaro Acholi to testify about the abduction of Mr Ongwen, his age, education, socio-economic conditions, duress and the issues related to Acholi traditional justice and the mechanisms of reconciliation and restorative justice.³⁹ The CLRV submits that the Chamber already heard ample evidence about Mr Ongwen's abduction and his

³⁷ See the transcript of the hearing held on 31 October 2019, *supra* note 35, p. 2 line 18 - p. 4 line 9.

³⁸ See the "Decision on Prosecution Request for Submission of an Additional Document for Purposes of Sentencing" (Trial Chamber VII), [No. ICC-01/05-01/13-2076](#), 5 December 2016, para. 9.

³⁹ See the Request, *supra* note 2, para. 26.

personal circumstance. Particularly, Witnesses D-0006, D-0007, D-0008, D-0012 and D-0032 all provided a substantial body of evidence in this regard.⁴⁰ As underlined before, the question of duress has already been adjudicated conclusively. As for the last part of the proposed evidence, there is again no possibility at the Court for administering punishments via local mechanisms for traditional and restorative justice in Uganda. Consequently, the proposed evidence lacks relevance to the determination of the sentence of Mr Ongwen. The same is applicable to the Defence's request to submit via bar table the statement by the Ker Kwaro Acholi contained in the *Addendum*.⁴¹

6) *Testimony of Rwot Baptist Latim (UGA-D26-P-0163)*

29. The Defence wishes to also call Rwot Baptist Latim to testify about the circumstances of the abductions by the LRA, Mr Ongwen's age, his education, socio-economic conditions and current personal situation and the issues related to Acholi traditional justice.⁴² The CLRV submits again that the Chamber already heard ample evidence about Mr Ongwen's abduction and his personal circumstances. For the same reasons outlined previously, the availability of traditional justice mechanisms has no bearing on the determination of sentence for a person convicted by the Court. Hence, the proposed evidence is highly irrelevant to the issue at hand.

7) *Statements by the Acholi Religious Leaders Peace Initiative and the Wang-oo Heritage of Acholi Elders*

30. According to the Defence, these statements discuss the personal circumstances of Mr Ongwen and the Acholi mechanisms of reconciliation and restorative justice, including Mato Oput.⁴³ As argued *supra*, the Statute exhaustively enumerates only four

⁴⁰ See the Judgment, *supra* note 3, paras. 26-31.

⁴¹ See the *Addendum*, *supra* note 6.

⁴² See the Request, *supra* note 2, para. 29.

⁴³ *Ibid.*, paras. 47-53.

types of penalty; chief among them - imprisonment. The relevant legal provisions of the Court offer no other options such as administering penalty through local mechanisms for rehabilitative and restorative justice. Consequently, the proposed evidence in this regard is without any relevance to the live issues currently rising before the Chamber.

C. *Request for testimony of family members of Mr Ongwen*

8) UGA-D26-P-0008, UGA-D26-P-0009, UGA-D26-P-0161 and UGA-D26-P-0162

31. The Defence seeks to introduce into evidence the statements of four family members [REDACTED] of Mr Ongwen who are expected to testify about his abduction, age, education, socio-economic conditions and family, specially the needs of his children.⁴⁴

32. While leaving the matter to the discretion of the Chamber, the CLRV considers that, in principle, the evidence to be provided by individuals who have intimate knowledge of Mr Ongwen's family and his children might be relevant to the determination of the sentence. However, given the similarity of the information contained therein, the Chamber should only accept the most representative statements of these witnesses, not all. The Chamber may indeed restrict the number and/or the scope and duration of the proposed evidence in the interest of expeditiousness.⁴⁵ Even if allowed, the relevant evidence should be restricted in its scope, focusing only on the social and economic conditions of Mr Ongwen, as provided for in rule 145(1)(c) of the Rules. Accordingly, the CLRV respectfully asks the Chamber to use its discretion to identify one or two witnesses in this category.

⁴⁴ See the Request, *supra* note 2, paras. 32-45.

⁴⁵ See the "Decision on requests to present additional evidence and submissions on sentence and scheduling the sentencing hearing", *supra* note 9, para. 15.

33. Concerning Dr. Catherine Abbo Adito, the CLRV notes that the Defence does not seek a specific relief from the Chamber. Obviously, Dr. Abbo's expert report and live testimony are already in evidence. In any case, the excerpts mentioned by the Defence were provided by the expert in the process of ascertaining the guilt or innocence of Mr Ongwen, not for the precise purposes of determining the sentence to be imposed upon him. Thus, the Chamber should not rely on the Defence's submissions in this regard since said excerpts were taken out of their context. Moreover, Dr. Abbo stated in her report the opposite of what the Defence is claiming in the Request. In particular, the expert said that moral concepts are largely formed in infancy and early childhood, involving the formation of a system of values on which to base decisions concerning "right" and "wrong" or "good" and "bad".⁴⁶ She also stated that, despite of his abduction at an early age, Mr Ongwen managed to attain the highest level of moral development as there is evidence that he was able to exercise flexibility in his moral judgment when he reportedly blamed his colleagues for atrocities committed by the LRA.⁴⁷ Thus, she concluded that Mr Ongwen matured and developed moral reasoning.⁴⁸ Therefore, the CLRV asks the Chamber to disregard the Defence's submissions on this point.

34. Finally, the CLRV stresses that Victims have been waiting for justice to be delivered for more than fifteen years. They are concerned that the prospective length of the sentencing hearing may unnecessarily prolong the remainder of the proceedings. Indeed, this phase should not drag on so that appropriate decision can be rendered fairly and expeditiously.⁴⁹ In meetings recently held to discuss the sentencing, Victims expressed their fear that the intervention of some witnesses and organisations (that are not representative of Mr Ongwen's views but purporting to

⁴⁶ See the Forensic Psychiatric Report of Mr Ongwen by Dr. Abbo at UGA-OTP-0280-0740, p. 9.

⁴⁷ *Ibid.*, at UGA-OTP-0280-0741, p. 10 and UGA-OTP-0280-0752, p. 21.

⁴⁸ *Ibid.*, at UGA-OTP-0280-0753, p. 22. See also her testimony ([T-166](#), p. 16 lines 6 – 12; and [T-167](#), p. 34 line 20 – p. 42 line 22).

⁴⁹ See the "Decision on Final Submission of Further Items for Sentencing" (Trial Chamber VII), [No. ICC-01/05-01/13-2099](#), 16 December 2016, para. 10.

represent the voice of Northern Uganda) would detrimentally impact these proceedings.

V. CONCLUSION

35. For the foregoing reasons, the Common Legal Representative of the Victims respectfully requests the Chamber to reject the Request in the part asking to recall witnesses who already testified, to present documents via the bar table and to call as witnesses religious/traditional leaders or to submit statements emanating from said leaders. She leaves to the discretion of the Chamber whether to authorise the testimony of family members of Mr Ongwen, indicating that only one or two individuals should eventually be called and that their evidence should be strictly confined to factors indicated in rule 145(1)(c) of the Rules.



Paolina Massidda
Principal Counsel

Dated this 31st day of August 2021

At The Hague, The Netherlands