

**Cour
Pénale
Internationale**



**International
Criminal
Court**

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No.: ICC-02/04-01/15

Date:

TRIAL CHAMBER IX

Before: Judge Bertram Schmitt, Presiding Judge
Judge Péter Kovács, Judge
Judge Raul C. Pangalangan, Judge

SITUATION IN UGANDA

IN THE CASE OF
THE PROSECUTOR v. DOMINIC ONGWEN

Public Document

Submission on Amicus Curiae Observations on Reparations

Source:

The Populace Foundation International (TPFI) - Civil Society Organization (CSO)

Makmot Kibwanga & Co. Advocates - Legal Consultants

Lango War Claimants' Association (LAWCAS) - Victims' Association

Lango Camp Host Association (LACHA) - Victims' Association]

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

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I. INTRODUCTION

1. This is a submission on *Amicus Curiae* observations to Trial Chamber IX from The Populace Foundation International (TPFI), Makmot-Kibwanga & Co. Advocates, Lango War Claimants' Association (LAWCAS) and Lango Camp Hosts' Association (LACHA) hereinafter referred to as 'the Organisations'. On the 17 November 2021, the Organisations were granted leave by Trial Chamber IX to submit *Amicus Curiae* Observations on reparations in the case of the *Prosecutor vs. Dominic Ongwen* in the situation in Uganda pursuant to Article 75 of the Rome Statute and rule 103 of the Rules of Evidence and Procedure.
2. TPFI, established since August 2005 in Northern Uganda, is a Ugandan policy research and advocacy civil society organization (CSO) with an international reach. TPFI envisions a society where humanity, social justice and human rights are respected in the development processes. It has specific objectives of saving lives, alleviating suffering and maintaining human dignity during and in the aftermath of man-made crises and natural disasters, and preventing and strengthening preparedness for the occurrence of such situations. The humanitarian catastrophes from the devastating insurgency whose extreme brutalities disrupted the functions of every institution such as ; healthcare, education, justice systems, etc. and left Northern and North-Eastern Uganda, to-date, in ruins - and this played a big and critical role in the formation of TPFI.

Since its establishment, TPFI has been contributing and providing a supportive environment that enables the cultivation and restoration of hope through human rights advocacy, wellbeing, research, peace-education, psychosocial support programmes, capacity building and other efforts that facilitate building fulfilled lives, harmonious living, inter-generational community and a dynamic society.

It has a vast experience of working in the war-torn northern Uganda and beyond. Please visit www.tpfi.org for more about the organisation and its programming.

3. M/S Makmot Kibwanga & Co. Advocates is a home-grown law firm that does local and international legal consultancy in human rights, access to justice, peace building, class actions, public interest and strategic litigation.¹ It was established in 2006. This period marked the emergence of new areas of legal practice in Uganda and it coincided with the deteriorating human rights and humanitarian law situation at the time in Uganda. This deterioration was more pronounced in

¹ www.makmot.com

Northern Uganda where the firm draws most of its membership and consequently its clientele. The firm specialized in human rights, class actions, structuring humanitarian responses, public and strategic interest litigation among others. It's composed of ; 3 Managing Partners, 16 Advocates, 8 Consultants, 12 Legal Associates, 7 Professional Assistants, and Legal Assistants.

4. LAWCAS is a victims-led organisation with 79,750 members and whose successful landmark court case pioneered the claim for reparation against the Government of Uganda (GoU) in the zone of Ushs. 1.7 Trillion which is equivalent to USD 479, 693, 760. These orders, however, remain unfulfilled by GoU.² This landmark case was tried by Makmot-Kibwanga & Co. Advocates with technical and logistical support from TPFI.

LACHA is another victims-led community-based organization (CBO) with 5,506 members. It has its headquarters in the former Internally Displaced Persons' (IDP) Camp of Abok, Oyam District – northern Uganda and was incorporated in May, 2011. Its membership comprise of ; victims of the Lord's Resistance Army (LRA) war and persons whose lands and their surrounding environment which they rely on for survival were damaged, degraded and destroyed due to the establishment of the internally displaced persons (IDP) camps as a result of the over 2-decade war between the GoU and the LRA rebels.

LACHA has undertaken mass action litigation against the GoU to seek for reparations. Towards this end, Makmot-Kibwanga & Co. Advocates is representing LACHA in Court while TPFI creates community awareness; develop and disseminate Information, Education & Communication (IEC) materials that espouses rights, land governance, environment conservation, etc. to the community ; translating and disseminating simplified versions of relevant material of awareness creation; mapping and verifying the nature of new emerging land-related conflicts affecting host communities; and training the association members. The organisation also structures and facilitates court processes including its latest intervention for the indigent, management of *locus in quo* in five designated districts in Lango Sub-regions.

5. These four members have been carefully selected for the purpose of optimally making this submission on reparations. They have the necessary local expertise.

² Delyon Johnson Wilson & 69,745 Others v. Attorney General of Uganda, High Court Civil Suit No. 27 of 2010.
<https://www.monitor.co.ug/uganda/news/national/60-000-lango-war-claimants-yet-to-be-paid-four-years-later-1795172>
<https://www.monitor.co.ug/uganda/news/national/government-releases-shs10b-to-compensate-teso-lango-war-claimants-3250908>

II. Procedural History

6. On the 17 November 2021, the Court's Chamber IX granted the Organizations leave to submit amicus curiae observations. This followed the call for application for leave by the ICC. This call itself can be traced to the 6 May 2021 when the Trial Chamber IX of the International Criminal Court, in the case of *The Prosecutor v. Dominic Ongwen* (the 'Ongwen case'), having regard to Articles 64 and 75 of the Rome Statute (the 'Statute'), rule 103 of the Rules of Procedure and Evidence (the 'Rules'), and regulations 24*bis*, 34 and 38(2) of the Regulations of the Court (the 'Regulations'), issued the Order for Submissions on Reparations (the 'Order').
7. The Chamber gave directions among which was number 5 (iii) which invited any persons or organizations, particularly with local expertise, interested in making submissions on the specific issues mentioned in the Order, to request for leave from the Chamber, pursuant to Article 75 of the Statute and rule 103 of the Rules, by Monday 7 June 2021.
8. The Organizations, collectively, requested for the leave and were granted by the Court Chamber IX on the 17 November 2021.

III. Applicable Law

9. Article 75 of the Rome Statute empowers Court to establish principles relating to reparations to, or in respect of, victims, including restitution, compensation and rehabilitation. It further provides for the scope and nature of determination of such reparations.
10. Meanwhile, rule 103 of the Rules of Procedure and Evidence provides for *Amicus curiae* and other forms of submission. It clothes the Chamber with the discretion to grant leave at any stage of the proceedings to a State, organization or person to submit, in writing or orally, any observation on any issue that the Chamber deems appropriate.
11. Article 17 of the Rome Statute recognizes the complementarity roles of the Court and encourages municipal participation. Municipal participation can be extended to include local organizations' role in seeking reparations both locally and in the ICC. The Organizations, namely; TPFI, Makmot Kibwanga & Co. Advocates, LAWCAS and LACHA have all made credible effort to have municipal reparations within the laws of Uganda rolled out but their attempts have failed and thus this submission for reparation to the Trial Chamber IX in *Ongwen Case*.

IV. Submission

12. That this submission is premised on the Organisations' earlier request for leave for amicus curiae observations on reparations which was granted on the 17 November 2021 (*Decision on the request to submit amicus curiae observation on reparations-No. ICC -02/04-01/15*), the Registry's Report on the Mapping Exercise cited as ICC-02/04-01/15-1919-Anx 1 06-12-2021 and Registry's Submissions on Reparations on the *Ongwen's* case cited as ICC-02/04-01/15-1919-AnxII 06-12-2021, which were submitted by the Registry as Mapping Report (Public Annex 1) and Registry's Submissions on Reparations (Public Annex II) which were both admitted on 6 December, 2021. This submission recognises the challenges and gaps identified in the two Victims' Participation and Reparations Section (VPRS) Missions' reports in mapping and reparations. It further suggests feasible interventions on reparations that largely address the gaps identified by the two Missions.
13. The Organisations hereby make submissions that calls for a *Victims-led Reparation*. This is because the situation in Uganda is unique as already seen during Ongwen's trial and therefore this peculiarity requires a tailor-made reparation process that is victims-led. Hence, this TPFI-led Consortium has expertise in this particular area. TPFI has supported LAWCAS initiate their war compensation process as early as 2010 and did the same with LACHA since the year 2014 when it commissioned an Environmental Audit Survey (EAS) in aid to LACHA which led to their environmental compensation reparation drive.
14. *Victims-led Reparation* principle, as espoused by the Organizations, is akin to the Victim-Centered Approach captured in the two reports transmitted in the Court's Registry. The Registry Submissions on Reparations in the Ongwen's Case report stated at section 58 as thus:

The entire reparations process, and in particular next steps in preparation of the implementation of reparations, needs to be victim-centred, field driven and conducted at the local level with the survivors fully contributing to defining, designing and taking ownership of the process.

Victims-led Reparation is similar but not entirely the same as Victim-Centered approach because the Victim-led Reparation puts the victims at the forefront and leadership position in the reparations process whereas victim-centered reparation may not necessarily consider victims as leaders in the reparation. Victim-led Reparation is a specific component of the Victim-Centered Approach

which seeks to put the victims in charge of their reparation process such as demonstrated by both LAWCAS and LACHA in their pursuits for reparations for their members. Victims-led Reparation does not exclude other victim-centered approach except such approaches use victim leadership as its basis.

Therefore, Victims-led Approach is when victim leadership is mainstreamed in the whole Victim-Centered Approach. This makes one of the cornerstones of the Organisations' submission.

15. The *Victims-led Reparation* process is categorized into three facets ; individualistic, communal and institutional. The Organisations believe that a true victim-led process is a conversation amongst these three categories as none is independent of the other. An individual victim is a member of the community which may require institutional interventions. However, there are clear cut scenarios that separate the individual from the community and the institution and therefore warranting an individualistic approach, for instance, an amputee due to the war. LAWCAS and LACHA have leverage in this area.

16. The uniqueness in this particular situation is due to the fact that there is a fine line between victims and perpetrators and the line is drawn in family relations, age diversity, gender relations, communal aspects, tribal similarities, and affinity between victims and apparent perpetrators.

17. It is therefore important that a reparation process should be seen to be victims-led and that informs the Organisations' submission. LAWCAS and LACHA who are both victims-led associations, directly and indirectly reaching an approximate population of 2.2 millions within the war-affected Lango Sub-region, give credence to this undertaking.

In addition, both LAWCAS and LACHA were designed to have influence beyond Lango Sub-region due to the nature of the conflict which was characterised by human movements across Sub-regions in Northern Uganda.

18. The *Victims-led Reparation* should lead to prompt reparations. The prompt reparations are the ability for the measures taken to demonstrate outright results. The practical approach and sensible reparation measures stated above have to be prompt and verifiable. This submission makes the involvement of the Organisations in identifying beneficiaries' victims an integral part of the submissions.

19. '*Do-no-harm*' principle should be mainstreamed in the process. Managing expectations, exercising utmost transparency to avoid conflict in communities and rolling out a comprehensive and holistic reparations intervention to address the different layers of needs and repair the complex and multifaceted types of harms are all crucial processes that the Organisations anchor this submission.
20. *Unpacking the accountability principle.* Since the trial of *Dominic Ongwen* was done far away from where the victims are, and more so where the majority did not have access to the media and made more severe by the restrictions imposed by COVID-19 standard operating procedures (SOPs), it is important that stakeholders and victims-led organisations get fully involved and actively participate in the reparation process as a feedback mechanism. This submission for reparation is intended to plug the gaps.
21. Hence, it is against the above backdrop that the Organisations makes submission on reparations. It is hoped that the submissions will make the convict directly accountable through the active participation and full involvement of victims in the reparation process, not only as beneficiaries but as their own representatives. It is further hoped that the victims-led reparations will propagate the deterrent aspects of *Ongwen's* case as an extension to the accountability process.
22. The submission also seeks to give the reparation an *egalitarian approach* which is akin to African societies. Egalitarianism requires communal participation and through this, the community owns and sustains the interventions.
23. This submission is also informed by the need to mainstream *traditional and customary practices* commonly employed among the victims and generally in northern Uganda. The need to unpack the useful and long tested social justice mechanisms such as *mato oput*, *culo kwor* and *kao cuk* and juxtapose them alongside formal reparation mechanisms with the intention to provoke dialogues informs the Organisations' efforts to make the submission for reparations. It is hope that the victim-centered approach which has been narrowed by this submission the victims-led reparations principle will invite useful traditional and customary practices in its quest to roll out a safe and community owned reparations interventions or reliefs for sustainability.
24. Lastly, the Registry Submissions on Reparations on the *Ongwen's* case is that victims must participate in the designing of desired reparations measures ; monitoring their implementation ; and the evaluation of the impact reparations

have. Therefore, it is this submission's observation that *Victims-led Reparations* is the desired way to go.

V. The Need for Reparations

25. The reparation process is comprehensive and covers extensive victims' areas and therefore impracticable to cover all and such its necessary to make submission on specific intervention areas within specific scopes. This submission therefore seeks to focus in Abok IDP Camp which is one of the locations for which *Mr. Ongwen* was tried and found guilty of committing crimes, as charged and convicted. Choosing Abok means that, by extension, the surrounding areas and to some extent the Lango, Acholi and Teso Sub-regions are covered because of the transhuman nature of the conflict.
26. According to TPFI's research findings which are available at www.tpfi.org/Abok, the population of direct and indirect victims was estimated at 13,000. The findings by TPFI were later corroborated, to some extent, by the VPRS Field Missions report, which itself was admittedly challenged by COVID-19 restrictions in outreach, transmitted to Chamber IX on 6 December 2021.
27. The victims of Abok, both direct and indirect, have suffered physical, transgressional, social harms for which now, upon conviction of *Mr. Ongwen* and the Court ordering for reparations, this submission is intended to make observation to Court to have the victims of Abok and surrounding areas benefit from the reparation process. If all are factored, then the number of victims will be way above the estimated 13,000. However, it is also hoped that any reparation intervention will trickle down to some of those victims who have since left Abok and the surrounding areas for their original homes and new areas of resettlements which are mostly within Lango Sub-region and others extend upto Acholi, Teso Sub-regions and beyond. This is because the departed victims have societal, cultural and economic ties with Abok location through marriages, trade and agricultural production among other factors. Therefore, an intervention on the 13,000 Abok victims is potentially reparation to over 100,000 direct and indirect victims of Ongwen's crimes which also include victims of other related thematic crimes. Abok upto now is known for its vibrant commercial activities that influence a good part of Lango, Acholi and Teso Sub-regions.

28. The trial and conviction of Mr. Ongwen exposed a number of atrocities and categories of victims. This comes with the different types of harms mainly categorized by the Registry's reports on the Mapping Exercise and further explained in the Registry's Submissions on Reparations on the *Ongwen* case as, among others, physical, transgressional and social. These reports were as a product of VPRS Missions to the field which identified various categories of victims. It categorized the victims as direct and indirect. The Court also had categorised the type of harm as material, physical or psychological. In a limited number of cases, the Registry has categorised the alleged harm as *substantial impairment of fundamental rights*: where the alleged crimes appeared to have interfered with a child's rights to education and family life, with the fundamental rights to liberty and security of the person, or with the associated right of persons deprived of their liberty to be treated humanely.

29. It therefore follows that the victims of Abok and, by extention, those affected thematically and indirectly suffered the following;

- i. Physical harms such as body injuries, mutilations, rape, abductions, torture etc;
- ii. Material harms such as deprivation of properties, destruction of properties, destruction of land and degradation of the environment; loss of livestock and other related livelihood sources etc.;
- iii. Psychosocial harms such traumatic experience from torture, rape, sepration of families, loss of livelihoods etc.

30. From the harms mentioned above, the victims of Abok mainly suffered loss of livestock and related livelihoods, which is material harm, but to a greater extent also psychological in nature. They also suffered physical harms like injuries to their bodies, and psychological harms e.g., rape, which is to a greater extent physical and deprivation of their fundamental rights. It is therefore this submission's observations that all these harms are inter-related and no one harm can be addressed independently. This has informed this submission's position to observe that reparations on livestock compensations and environmental reparations will resultantly lead to, some extent, reparations on other harms suffered such as psychological and physical harms. Livestock compensation and environmental reparations, which are responses to material harms, have the potential to impact positively towards reparations of all other harms suffered by the victims. This particular position is informed by the fact that all of these

victims by tradition and practice value livestock and environment – which can never be divorced from land – and often find them as solutions to most of their problems. For instance, an unlawful killing is compensated by seven heads of cattle, arson is compensated by 4 heads cattle, rape and defilement is compensated by four heads of cattle and four goats, and injuries to the bodies are compensated by such numbers and categories of livestock according to the gravity of the injuries caused. Another example is the environment which influences fertility of land and thus productivity, psychological comfort of belongingness, psychosocial satisfaction of recognition by the communities, food production as the greener the environment the more the food produced and the happier the people.

31. Therefore, this submission observes that the best intervention for the people of Abok location and its surrounding areas must include livestock compensation and environmental reparations – which include repairing, damaged land.
32. This submission is informed by the need to provide reparations for the victims of Abok location for the destruction of property which has resulted into material harm. It has further resulted into a substantial impairment of fundamental rights such as deprivation of economic rights to own property, interruption of schooling due to inability to afford etc. There has also been social harm as a result of destruction of property - whereby families broke up due to lack of resources which have been destroyed e.g, houses burnt, livestock stolen, land degraded and environment destroyed etc.
33. Submissions should mainstream communal and institutional interests against individual interests. Indeed, it is a predominant culture in Abok and surrounding areas that animals are ‘communally owned’ in nature. For example, oxen and bulls are freely offered by members of the communities to each other for ploughing and fertilization.
34. Finally on harms, whether categorized as direct or indirect victims of thematic crimes or not, transgressional harm is almost always visible to victims and their children as well as onto the next generations. It takes a hybrid of interventions to address it.
35. The Organisations further observe that the Court ought to adopt the home-grown processes of victims’ identification, registration and legal screening process which have been tested by them. The processes include the employment of the

community to identify victims; government screening process whereby victims fill forms and later be verified by the Local Council authorities, forms are then subjected to peer-review to ensure the victims have genuine claims. Traditional and religious leaders are also involved in the identification processes. With do-no-harm principle in mind, the victims' data are then subjected to court trials under the tenacity of cross examination and production of documentary evidences after which the Inter-Ministerial Committee including Ministry of Finance Planning & Economic Development (MFPED) and Ministry of Justice & Constitutional Affairs also carried out their own verification processes based on National Identity Cards, registered telephone numbers, intelligence reports, veterinary reports, etc.

36. Vulnerable victims such as children are identified primarily as a result of deaths of their parents and or guardians which normally almost translate to the need for legal guardianship order. Vulnerable women were identified through the same processes especially those that have been victims of sexual and gender-based violence (SGBV) in the sense that most of them widowed and are being denied compensation outcomes by families of their husbands or women being denied compensation proceeds from the families where they were born. While Persons with Disabilities (PWDs) were also mapped out. This was with the intention of giving them preferential treatments since they should be one of the first categories to benefit from the reparation process.
37. Given the sufficiency of the identification of beneficiaries, the appropriate and sensible reparation measures are very clear in our submissions.

VI. Relief Sought

38. The Organisations respectfully requests the Trial Chamber IX to consider this submission on *amicus curiae* observations on reparations and in particular on the the leadership and participation of the victims in the reparation process. It further proposes that the Court benchmarks the TPFI, Makmot-Kibwanga & Co. Advocates, LAWCAS and LACHA's approaches as victims-led and victims-centered organizations for replication in the reparation process.
39. The Organizations submit that the principle of reparations be expanded to include; *Victims-led Reparation's* principle, livestock compensation reparations, and environmental reparations as was noted in the case of the *Prosecutor v. Thomas Lubanga Dyilo* which states that "principles should be general concepts

that, while formulated in the light of the circumstances of a specific case, can nonetheless be applied, adapted, expanded upon, or added to by future Trial Chambers”.

40. The justification of this approach is for the ultimate consideration of vulnerable groups such as children, women and person with disabilities (PWDs) as primary beneficiaries. It is this submission’s proposal that interventions should take into consideration the above three groups and further it is this submission’s observations that priority should be towards supporting the groups who have directly or indirectly - through their parents and gaurdians - lost their land, livestocks and environment degraded and in extreme cases, completely depleted.
41. The Organisations further submit that they have the following specific reliefs which are victims-led and premised on the texts of the Court. These are;

- i. Environmental Reparations and Incidentals*

It is this submission’s observation that the principles of reparations’ expansion and adaptation include environmental degradation and livestock losses to Ongwen and Sinia Bridage which occurred between 2002 and 2005 in Abok location. To that effect, LACHA has victims of environmental degradation totatlling 5,505 members.

- ii. Replanting Boundaries*

Environmental degradation had the effect of damaging the common and known boundaries such as special trees used for boundary demarcations. The most immediate victims of boundary destruction are children and women due to their vulnerability. They are always overpowered by the male owners of neighbouring lands and sometimes their own family members who in most cases tend to reduce the sizes of their lands or even deny them the right to own land due to lack of clear boundaries.

It is this submission observation that the reparation funds should be able to fund the replanting of boundaries and also provide resources to the victims of environmental degradation, especially women, children and the disabled so as to recover back their lands and to put them to maximum use. This is achievable by empowering them with the information and providing them with modern tools and technical assistance with farming. This should be awarded as a reparations measure.

As an invitation, the reparation process is free to replicate TPFI's tested past information empowerment interventions which have worked elsewhere in the Sub-regions of Lango, Acholi and Teso.

iii. Environmental Restitution through Greening

The Organisations observe that the reparation process should take the direction of Environmental Restitution where it specifically looks at greening the environment to its natural foliage to reclaim back its natural ecological balance and this can be done through training and financial support to victims.

The calculations by the Organizations found out that each victim is entitled to Ushs. 20 Million (USD 5,550). This covers seedlings, land preparations, natural fertilizers, labour and machinery among others.

iv. Decommissioning

The reparation can take the form of decommissioning of the IDP Camps. It is this submission's observation that the Court should avail logistical support to decommission the camps.

TPFI made an *Environmental Audit Survey (EAS)* and disseminated the same in a report which is available at www.tpfi.org/eas2015 wherein it made recommendations to the Government of Uganda (GoU) for immediate decommissioning of the camp sites. TPFI's major findings were ; plastic pollution, chemical pollution, deforestation, surface disruptions, gapping holes left behind, reduced soil fertility, diminished land boundaries which normally result into land wrangles.

This was done at the behest of LACHA. The GoU failed to respond to the call and LACHA, with legal support from Makmot-Kibwanga & Co. Advocates, instituted a civil action vide *Jackson Oneka vs Attorney General Lira HCCS No. 27/2016* against the GoU which was never adjudged hence this submission which invokes Article 17 of the Rome Statute.

This submission, therefore, emphasizes the need for decommissioning of the land which had IDP camps, cleaning and restituting the environment which was damaged, degraded and destroyed due to the establishment of the

internally displaced persons (IDP) camps on the victims' farm land. The IDP camps resulted from Mr. Ongwen's criminal conduct.

This submission observes that the appropriate measures to be rolled out regarding reparations are ;

- a) Detoxification of land in Abok location. The Organisations submit that Ushs. 2 Billion (USD 700,000) is adequate for such undertaking.
- b) Re-filling of 105 holes at a value of Ushs. 3 Million totalling Ushs. 315 Million (USD 90,000).
- c) Introduction of humus and manures in 600,000 acreages at a rate of Ushs. 120,000 per acre amounting to Ushs. 7.2 Billion (USD 2 Millions).
- d) Landscaping over 12,000 acreages resulting from disrupted terrains from IDP advent at 200,000 per acre making upto Ushs. 2.4 Billion (USD 670,000).

v. Livestock Compensation

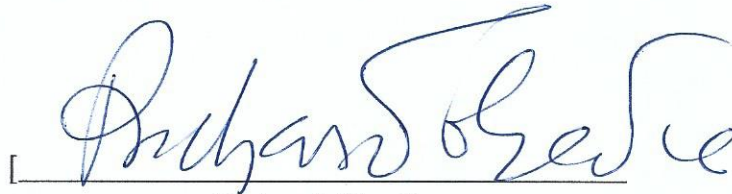
The Organisations are aware of direct, indirect and thematic victims some of whom suffered loss of livestock. These categories are mainly in Abok IDP Camp which itself is one of the 4 locations of interest to the Court. According to data collected and verified by the High Court of Uganda, Abok location lost a total of 4,502 heads of cattle, 6,153 goats and 2007 sheep, among others.

The test for the compensation of livestock which include cattle, goats, pigs, sheep, and chicken, is the data already captured and verified by GoU. Values of these livestock have been conveniently assessed by the judicial process of Uganda through various judgments including ; LAWCAS case of *Delyon Vs Attorney General Lira HCCS No. 27 of 2010*, *Col. Francis Ongia Vs Attorney General Lira HCCS No. 06 of 2011*, *Adyera vs Attorney General Gulu HCCS* in Acholi Sub-region and more other cases in Teso where generally a head of cattle is valued at Ushs. 900,000 (USD 250) ; a goat at Ushs. 150, 000 (USD 45) ; Pig Ushs. 250, 000 (USD 60), a sheep Ushs. 150, 000 (45 USD) and chicken Ushs. 35,000 (USD 10).

It is therefore the observation in this submission that the data available is adequate to aid Court in making livestock compensation reparations.

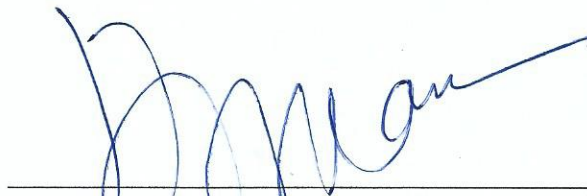
Respectfully Submitted

on behalf of



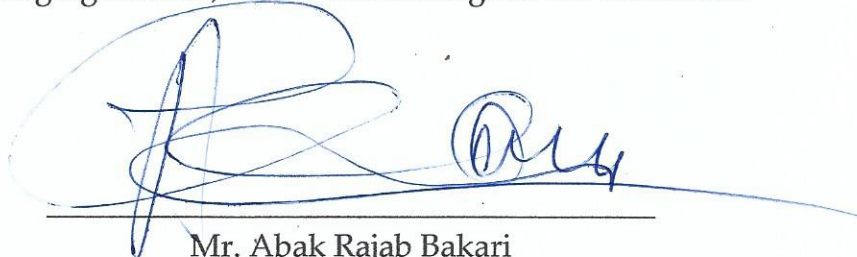
Richard Obedi

Executive Director; The Populace Foundation International (TPFI)



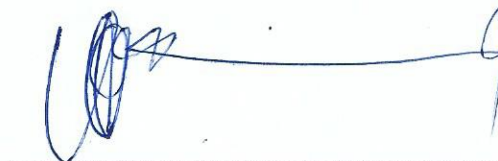
Rajab Adams Makmot Kibwanga;

Managing Partner, Makmot Kibwanga & Co. Advocates



Mr. Abak Rajab Bakari

Coordinator, Lango War Claimants' Association (LAWCAS)



Mr. Jackson Oneka

Chairman, Lango Camp Host Association (LACHA)]

Dated this 6 February 2022

Kampala, Uganda

At [place, country]