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**International
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Date: **10 March 2022**

TRIAL CHAMBER V

Before:

**Judge Bertrand 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 ROMBHOT YEKATOM AND PATRICE-EDOUARD
NGAISSONA**

PUBLIC

Public redacted version of the “Defence response to Prosecution’s ‘Request for leave to add 21 Items to the List of Evidence and their Submission from the Bar Table, and to extend the estimated examination time for P-0889’ (ICC-01/14-01/18-1285-Conf)”, ICC-01/14-01/18-1293-Conf, 24 February 2022

Source: Defence of Patrice-Edouard Ngaïssona

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

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I. Introduction

1. On 17 February 2022, the Prosecution filed its “Request for leave to add 21 Items to the List of Evidence and their Submission from the Bar Table, and to extend the estimated examination time for P-0889”.¹ The Defence for Mr Patrice-Edouard Ngaïssona (“Defence”) hereby responds to the Prosecution’s request for leave to add 21 items to the List of Evidence, as well as to the Prosecution’s request to extend the examination time for P-0889. As ordered by Trial Chamber V (“Chamber”), the Defence will only respond to the Prosecution’s request for submission of the 21 items from the Bar Table at a later stage, should the request to add the 21 items to the List of Evidence be granted.²
2. The Defence opposes the Prosecution’s request to add 21 items to the List of Evidence, as the Prosecution has not demonstrated that the legal requirements warranting the amendment of its List of Evidence have been met.
3. Similarly, the Defence opposes the Prosecution’s request to extend the examination time for P-0889.

II. Confidentiality

4. This response is filed as confidential pursuant to Regulation 23 (1) *bis* of the Regulations of the Court (the “Regulations”), as it responds to a filing of the same classification. A public redacted version will be filed as soon as practicable.

¹ ICC-01/14-01/18-1285-Conf.

² Email sent by Trial Chamber V on 18 February 2022 at 13:41.

III. Relevant Procedural History

5. On 16 July 2020, the Chamber ordered the Prosecution to disclose all incriminatory material by 9 November 2020 and to file a corresponding List of Evidence containing all the materials it intended to submit as evidence during trial by the same deadline.³ The Chamber indicated that, in order to add material to the List of Evidence after the deadline of 9 November 2020, leave should be sought by the Prosecution.⁴
6. Over the following year, the Prosecution requested leave to add material to its List of Evidence six times.⁵ When ruling on said requests, the Chamber repeatedly stressed that the Prosecution should thoroughly review its List and request any additions on an exceptional basis and in a timely manner.⁶ On 7 December 2021, the Single Judge further stressed that it expected no more oversights from the Prosecution in this regard and ordered it to file an updated List of Evidence.⁷ The updated List of Evidence, which the Prosecution filed on 14 December 2021, comprised an additional 120 items of evidence, bringing the total number of evidentiary items in the List of Evidence to 19,962.⁸ On the same day of filing its updated List of Evidence, the Prosecution filed another request for leave to add items to it.⁹
7. On 11 January 2022, in accordance with the Initial Directions on the Conduct of the Proceedings,¹⁰ the Prosecution provided the list of exhibits it intended to

³ ICC-01/14-01/18-589.

⁴ Ibid, para. 16.

⁵ ICC-01/14-01/18-715-Conf; ICC-01/14-01/18-958-Conf; ICC-01/14-01/18-1042-Conf; Email sent by the Prosecution on 28 September 2021 at 17:37; ICC-01/14-01/18-1144-Conf; ICC-01/14-01/18-1164-Conf.

⁶ Email sent by Trial Chamber V on 29 September 2021 at 10:00; Transcript of hearing, 5 November 2021, ICC-01/14-01/18-T-073-CONF-ENG, p. 3, lines 9-15; ICC-01/14-01/18-1206, para. 15.

⁷ ICC-01/14-01/18-1206, para. 15.

⁸ ICC-01/14-01/18-1211, para. 2.

⁹ ICC-01/14-01/18-1212-Conf.

¹⁰ ICC-01/14-01/18-631, para. 41.

use for the examination of witness P-0889,¹¹ whose testimony was set to begin on 17 January 2022.¹² The Chamber has repeatedly indicated that documents that the parties intend to use during a hearing should be included in the List of Evidence.¹³ Nevertheless, the Prosecution listed a number of items that did not feature on its List of Evidence, including the 21 items which are the subject of the present request (“21 items”). The Prosecution disclosed the 21 items to the Defence on 4 and 11 June, pursuant to Rule 77 of the Rules of Procedure and Evidence (“Rules”).¹⁴ On 11 February 2022, the Prosecution reclassified the 21 items to “INCRIM”.¹⁵

8. On 17 February 2022, the Prosecution filed its “Request for leave to add 21 Items to the List of Evidence and their Submission from the Bar Table, and to extend the estimated examination time for P-0889”.¹⁶ On the same day, the Chamber shortened the deadline to respond to said request to 24 February 2022,¹⁷ given the imminence of P-0889’s testimony, who is currently set to begin testifying on 8 March 2022.¹⁸
9. On 18 February 2022, noting that the necessity for a ruling on the Prosecution’s Bar Table Application would depend on the outcome of the Chamber’s decision on the request to add the relevant items to the Prosecution’s List of Evidence, the Chamber granted the Defence’s request to suspend the deadline to respond to the Bar Table Application “until further notice”.¹⁹

¹¹ Email sent by the Prosecution on 12 January 2022 at 11:35.

¹² Email sent by the Prosecution on 16 December 2021 at 08:52.

¹³ Email sent by Trial Chamber V on 29 September 2021 at 10:00; Transcript of hearing, 5 November 2021, ICC-01/14-01/18-T-073-CONF-ENG, p. 3, lines 9-15.

¹⁴ Trial Rule 77 Package 49, containing 304 items (ICC-01/14-01/18-1013); Trial Rule 77 package 50, containing 879 items (ICC-01/14-01/18-1018).

¹⁵ Trial Re-classification to INCRIM Package 10, containing 29 items (ICC-01/14-01/18-1277).

¹⁶ ICC-01/14-01/18-1285-Conf.

¹⁷ Email sent by the Single Judge on 17 February 2022 at 17:57.

¹⁸ Email sent by the Prosecution on 26 January 2022 at 12:20.

¹⁹ Email sent by the Single Judge on 18 February 2022 at 13:41.

IV. Applicable Law

10. In the first decision the Chamber rendered on whether to grant the Prosecution leave to add items to its List of Evidence,²⁰ the Chamber found that “it must be determined in the concrete circumstances whether reliance by the Prosecution on items additional to those included in the initial list of evidence causes undue prejudice to the procedural rights of the Defence.”²¹ In making this determination, the factors to be considered include *inter alia* : (1) the extent to which the requested addition is opposed by the Defence; (2) the time when the addition was sought; (3) the nature and the amount of the material concerned; (4) the intended purpose of the Prosecution’s requested reliance on such material; and (5) its prospective significance in light of the charges brought against the accused and the rest of the available evidence.²²

V. Submissions

A. Prosecution’s Request to add 21 Items to its List of Evidence

11. The Defence objects to the Prosecution’s request to add 21 items to its List of Evidence and submits that reliance by the Prosecution on said items would cause undue prejudice to the procedural rights of the Defence.

12. *First*, the Prosecution’s request is wholly untimely. While receipt of the items after the 9 November 2020 disclosure deadline may have been due to reasons outside the Prosecution’s control, the delay in disclosing the material under the correct classification and in informing the Defence that it intended to rely on said material is unjustifiable and wholly attributable to the Prosecution. The Prosecution has been in possession of the 21 items since 5 March 2021, therefore

²⁰ ICC-01/14-01/18-989-Conf.

²¹ *Ibid.*, para. 5.

²² *Ibid.*, para 5.

for close to one year.²³ Having received the documents, the Prosecution analysed them twice: once to filter out irrelevant material, and once to, *inter alia*, classify them legally.²⁴ At the time of review, the Prosecution was fully cognisant of the breadth and nature of the case against Mr Ngaïssona, having filed its Trial Brief over four months prior²⁵ and having already begun calling witnesses in the case.²⁶ Furthermore, the Prosecution was aware of the apparent significance of P-0889's testimony to its case, given that it interviewed the witness twice, [REDACTED], and that it had made a request to [REDACTED].²⁷ Against this backdrop, the Prosecution cannot argue that it did not immediately recognize the alleged significance of the 21 items, which it qualifies as providing "direct evidence that is consistent with the theory of the case and the basis of the confirmed charges".²⁸

13. Even assuming *arguendo* that the Prosecution only noticed the significance of the 21 items during the preparation of P-0889's examination, the Prosecution's subsequent conduct shows a complete disregard for the Chamber's instructions to "thoroughly review its List of Evidence for completeness" and to request the addition of any material it intends to rely on at trial in a timely manner.²⁹ The Prosecution conducted a further review of the 21 items in January 2022 or earlier, which led the Prosecution to include them in its List of Exhibits for witness P-0889 on 11 January 2022. At the time, the Prosecution had information before it that it had disclosed the 21 items to the Defence pursuant to Rule 77, and that the 21 items had not been included in its List of Evidence. Nonetheless, the Prosecution unexplainably waited one month before

²³ ICC-01/14-01/18-1285-Conf, para. 3.

²⁴ ICC-01/14-01/18-1285-Conf, para. 10.

²⁵ ICC-01/14-01/18-723-Conf.

²⁶ The first Prosecution witness in the case began testifying on 15 March 2021.

²⁷ CAR-OTP-2127-9187.

²⁸ ICC-01/14-01/18-1285-Conf, para. 21.

²⁹ ICC-01/14-01/18-1206, para. 8.

reclassifying said items to “INCRIM”, and more than a month before requesting leave to add them to its List of Evidence. The Prosecution does not provide any explanation for these delays. On the contrary, it seeks to benefit from its shortcomings, arguing that the Defence was on notice of the significance of the 21 items, given that the Prosecution had included the items in its List of Exhibits for P-0889.³⁰

14. The Defence notes that in a similar case to the one at hand, the Single Judge expressed concern at the Prosecution requesting the addition of material to its List of Evidence over a month after having presumably detected an oversight.³¹ Albeit recognizing that the Prosecution’s error was unfortunate, the Single Judge found that said error did not constitute an impediment to adding items to the List of Evidence, given that the Prosecution had made the error while acting in good faith and that there were no indications of abuse.³² By contrast, the case at hand presents several indications of abuse. Having realised that the 21 items were relevant during its preparation of P-0889’s examination, the Prosecution waited for more than a month to reclassify them and seek leave to add them to its List of Evidence, despite being fully aware of the imminence of P-0889’s testimony and of the Defence’s right to prepare. Moreover, when it finally filed its request, it did so on the eve of a lengthy evidentiary block, knowing that the Defence’s resources would be fully engaged with courtroom proceedings and that the timing of its request would barely allow time for its adjudication in advance of P-0889’s testimony.

15. *Second*, with respect to the nature and volume of the 21 items, the Defence disagrees with the Prosecution’s contention that the 21 items are “limited in

³⁰ ICC-01/14-01/18-1285-Conf, para. 22.

³¹ ICC-01/14-01/18-1206, paras 8-9.

³² ICC-01/14-01/18-1206, para. 9.

volume”.³³ The Prosecution cannot argue that a total of 192 pages of Facebook conversations, involving 20 interlocutors who are mostly unknown to the Defence, are limited in volume. Nor does prior disclosure to the Defence pursuant to Rule 77 of the Rules diminish the burden on the Defence to review and analyse said material. The Defence notes that, to date, the Prosecution disclosed almost 7,000 items of evidence pursuant to Rule 77 of the Rules. The 21 items were disclosed in packages that contained, in total, 1,183 items of evidence.³⁴ The Prosecution had not articulated the relevance of the items to its case, nor added the items to its List of Evidence. The Prosecution cannot insist that the Defence assume that all items not presently on the Prosecution List of Evidence will be added at any moment. To insist this would unfairly divert Defence resources towards material that might never enter the hearings. This would then diminish resources that should be rightfully directed towards challenging evidence that is unambiguously part of the proceedings.

16. Further, the Defence is puzzled by the Prosecution’s contention that “[g]iven their relationship to the persons and subject matter of the conversations, the Defence has always been in a better position than the Prosecution to recognise the materiality of the information.”³⁵ The Defence does not see how it could be in a better position than the Prosecution to recognize which items of evidence are material to the Prosecution’s case, and which ones are not, especially given that Prosecution has been conducting investigations in this case since 2014. Moreover, given that the 21 items consist of private Facebook conversations not involving Mr Ngaïssona, the Defence fails to comprehend how it could have any advantage on the Prosecution to understand and analyse said conversations.

³³ ICC-01/14-01/18-1285-Conf, para. 22.

³⁴ Trial Rule 77 Package 49, containing 304 items (ICC-01/14-01/18-1013); Trial Rule 77 package 50, containing 879 items (ICC-01/14-01/18-1018).

³⁵ ICC-01/14-01/18-1285-Conf, para. 22.

17. *Third*, the Prosecution appears to inflate the prospective significance of the 21 items in light of the charges brought against Mr Ngaïssona and the rest of the available evidence, by:

- (i) failing to address the fact that similar information is already available in items of evidence already included in the List of Evidence;
- (ii) interpreting the conversations incorrectly, or choosing the interpretation that is most fitting to the Prosecution's case;
- (iii) ignoring the internal lack of consistency of certain conversations;
- (iv) stating that certain conversations are demonstrative of the Anti-Balaka's mind-set and sentiments, while such conversations simply report individual opinions; and
- (v) stating that certain conversations demonstrate that two persons were "in communication", despite the interlocutors of P-0889 having never responded.

i. Similar information is already available on the record of the case

18. One of the factors the Chamber must consider in determining whether to grant leave to add items to the list of evidence is the significance of the evidence in light of the rest of the available evidence. The Defence submits that the information contained in several conversations is insignificant in light of the very same information being available on the record of the case. Its potential contribution to the Chamber's truth finding function would be *de minimus*. Therefore, the prejudice to the Defence of adding these items greatly outweighs the minimal significance of the evidence. For instance, information contained

in conversations 2, 5, 6³⁶ and concerning [REDACTED].³⁷ Information contained in conversation 6 and [REDACTED],³⁸ which was submitted by the Prosecution pursuant to Rule 68(3) of the Rules.³⁹ Similarly, information in conversation 10 concerning [REDACTED] is already included in P-0889's statement.⁴⁰ The same observation can be made for information contained in conversation 16 and relating to the fact that [REDACTED], which was already confirmed by P-0889.⁴¹ With respect to information concerning the fact that [REDACTED], allegedly contained in conversation 17, the Defence notes that this information is already available.⁴² [REDACTED], which the Prosecution infers from conversations 6 and 18, P-0889 already provided extensive information in his statement in this regard.⁴³ Lastly, information concerning the alleged [REDACTED] is already available in P-0889's statement.⁴⁴

ii. The Prosecution's interpretation of the 21 items is incorrect or imprecise

19. In many cases, the Prosecution's interpretation of the items is an exaggeration of the evidence, or is plainly incorrect. For example, the Prosecution infers from conversation 20 that weapons were held at Mr Ngaïssona's warehouse in 2013. However, a plain reading of the conversation demonstrates that the Prosecution's interpretation is incorrect: [REDACTED].⁴⁵ Similarly, the Prosecution infers from a message in conversation 18, stating [REDACTED]. However, there is no mention whatsoever of Mr Ngaïssona's name in such

³⁶ For ease of reference, the Defence refers to the tab numbers indicated by the Prosecution in its Confidential Annex ICC-01/14-01/18-1285-Conf-Anx, which lists the 21 items and their alleged significance.

³⁷ [REDACTED]. [REDACTED].

³⁸ CAR-OTP-2122-7825-R02, at 7841 lines 563-567.

³⁹ ICC-01/14-01/18-1226-Conf.

⁴⁰ CAR-OTP-2122-7554, at 7560-7566, lines 243-463, at 7568, lines 545-574.

⁴¹ CAR-OTP-2122-7554, at 7569, lines 620-621.

⁴² [REDACTED].

⁴³ See inter alia: CAR-OTP-2027-2290-R02, at 2297, paras 38-40; CAR-OTP-2122-7600-R02, at 7612, lines 463-480 and at 7615-7616, lines 595-635. With respect to continued fighting after the 5 December attack, see inter alia CAR-OTP-2122-7781-R02, at 7782-7787, lines 15-220.

⁴⁴ CAR-OTP-2122-8079-R02, at 8100, lines 722-732.

⁴⁵ CAR-OTP-2133-8109, at 8111.

conversation and the conversation does not lead to such a conclusion.⁴⁶ In conversation 15, the Prosecution speculates that the exchange [REDACTED]⁴⁷ means that Mr Ngaïssona and Mokom were the creators of the movement. However, the meaning of the message is not as self-evident as the Prosecution suggests. It is indeed unclear why [REDACTED], if Mr Ngaïssona belonged to the latter category. In conversation 7, the Prosecution infers that [REDACTED],⁴⁸ [REDACTED]. In conversation 6, the Prosecution makes a speculative leap, claiming that people planned the 5 December attack because of the presence of certain persons [REDACTED] .⁴⁹ While the above only constitute examples of incorrect or stretched interpretation, there are many more instances where the Prosecution's interpretation of the 21 items is at the very least disputable. The Defence submits that the assessment of the 21 items' significance should not be based on the Prosecution's stretched or incorrect interpretation, but rather on their plain content.

iii. Some conversations lack internal consistency

20. Moreover, certain conversations lack internal consistency, which weakens their prospective significance. For example, in conversation 12, P-0889 tells [REDACTED].⁵⁰ Similarly, in conversation 13, P-0889 informs [REDACTED].⁵¹ In both conversations, is it therefore unclear whether P-0889 is with [REDACTED] or not.

⁴⁶ CAR-OTP-2133-2741, at 2760.

⁴⁷ CAR-OTP-2132-9727, at 9729-9730.

⁴⁸ CAR-OTP-2131-9585, at 9586.

⁴⁹ CAR-OTP-2131-8590, at 8605-8606.

⁵⁰ CAR-OTP-2132-6963, at 6972.

⁵¹ CAR-OTP-2132-7226, at 7235-7236.

iv. *The Prosecution conflates individual opinions and Anti-Balaka's sentiments*

21. The Prosecution inflates the apparent significance of other conversations, such as number 4, 13 and 14, by stating that they are demonstrative of the Anti-Balaka's sentiments and mind-set, despite the fact that those conversations simply contain the personal opinions of P-0889 or his interlocutors.⁵²

v. *The Prosecution turns unilateral messages into "communications"*

22. Lastly, the Prosecution inflates the significance of conversations 8 and 11, stating that such conversations demonstrate that P-0889 was in communication with [REDACTED], despite the fact that the two interlocutors never responded to P-0889's messages.⁵³ Furthermore, the Prosecution has not pointed to any evidence suggesting that [REDACTED].

23. In light of the above, the Defence submits that the 21 items do not bear sufficient significance to the Prosecution's case to override the prejudice that the Defence would suffer due to their late addition to the List of Evidence and their use during P-0889's examination. Indeed, should leave be granted to use the 21 items during P-0889's examination, the Defence will be obliged to conduct a cross examination without being afforded time to investigate all the information contained in the items which are being brought to incriminate Mr Ngaïssona. This is prejudicial. For example, the Prosecution proposes to show through Item 9 that there was a link between the Anti-Balaka and FROCCA, and that FROCCA has a military character. The Prosecution's suggestion stems from the fact that, on 13 November 2013, [REDACTED].⁵⁴ Naturally, in order to dispel the Prosecution's proposition, the Defence would be assisted by the collection of further information about [REDACTED] and his role, if any,

⁵² CAR-OTP-2131-5154, at 5155 ; CAR-OTP-2132-7226, at 7228 and 7241-7242; CAR-OTP-2132-7764, at 7770-7771.

⁵³ CAR-OTP-2131-9941; CAR-OTP-2132-2941.

⁵⁴ CAR-OTP-2132-0021, at 0021.

during the conflict. However, the imminence of P-0889's testimony makes it virtually impossible for the Defence to properly investigate this person. Similarly, the Defence will not be in a position to investigate and potentially refute the Prosecution's attribution of certain nicknames, such as [REDACTED]⁵⁵ and [REDACTED],⁵⁶ to persons of relevance to the case. These are non-exhaustive examples that highlight the disadvantages that the Defence would face, should the Prosecution be allowed to rely on the 21 items during its examination of P-0889. Such disadvantages are further exacerbated by the fact that the Prosecution anticipates having to spend an additional four hours of its examination tackling the content of the 21 items.⁵⁷

24. In sum, none of the factors the Chamber must consider in determining whether to grant leave to add the items to the List of Evidence weigh in favour of granting the Prosecution's request. To the contrary, granting the Prosecution's request would seriously prejudice the Defence's ability to fulfil its role, given the lack of time to meaningfully analyse and investigate the content of the 21 items. The Defence stresses that such lack of time is solely the consequence of the Prosecution's conduct.

B. Prosecution's request to extend the examination time for P-0889

25. The Defence opposes the Prosecution's request to extend the examination time for P-0889 from two to six hours. Even assuming that the Chamber were to grant the Prosecution's request to add the 21 items to the List of Evidence, the Defence considers the Prosecution's request to examine P-0889 for four additional hours to be exaggerated. This is especially since a relevant portion

⁵⁵ [REDACTED].

⁵⁶ [REDACTED].

⁵⁷ ICC-01/14-01/18-1285-Conf, para. 23.

of the information contained in the 21 items is already contained in P-0889's Rule 68(3) prior-recorded testimony, as outlined above.

26. Since filing its first anticipated witness order, the Prosecution estimated that it would need 2 hours to complete its examination of P-0889.⁵⁸ This estimation had not changed when the Prosecution transmitted its Order of Witnesses and Schedule for Block 9,⁵⁹ nor when it transmitted its summary of P-0889's testimony and the list of exhibits it intended to use during P-0889's examination.⁶⁰ At that time, the Prosecution was already aware that it wished to use the 21 items during P-0889's examination. The Trial Chamber should reject the Prosecution's request to expand its examination by four hours because it is untimely.

27. Furthermore, one of the factors that the Chamber considered when granting the Prosecution's request to introduce P-0889's prior-recorded statement pursuant to Rule 68(3) of the Rules was that such introduction would contribute to the expeditiousness of the proceedings, reducing the Prosecution's examination from eight to two hours.⁶¹ Granting the Prosecution's request for four additional hours to conduct P-0889's examination would make this reasoning almost moot. Moreover, the Defence hereby respectfully informs the Chamber that, should the Chamber grant the Prosecution's request for additional time, the Defence will request an additional two to three hours to conduct its examination of P-0889, in order to properly address any information arising from the Prosecution's additional examination.

⁵⁸ ICC-01/14-01/18-724-Conf-AnxB, page 3.

⁵⁹ Email sent by the Prosecution on 16 December 2021, at 08:52.

⁶⁰ Email sent by the Prosecution on 11 January 2022, at 21:09.

⁶¹ ICC-01/14-01/18-1226-Conf, para. 30.

VI. Relief sought

28. The Defence respectfully requests the Chamber to REJECT the Prosecution's Requests for leave to add 21 Items to the List of Evidence and REJECT the Prosecution's request to extend the estimated examination time for P-0889.

Respectfully submitted,



Mr. Knoops, Lead Counsel for Patrice-Edouard Ngaïssona

Dated this 10 March 2022,

At The Hague, the Netherlands