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Pénale
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**International
Criminal
Court**

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No.: **ICC-01/14-01/21**

Date: **2 June 2022**

TRIAL CHAMBER VI

Before: Judge Miatta Maria Samba, Presiding Judge
Judge María del Socorro Flores Liera
Judge Sergio Gerardo Ugalde Godínez

**SITUATION IN THE CENTRAL AFRICAN REPUBLIC II
IN THE CASE OF *PROSECUTOR v. MAHAMAT SAID ABDEL KANI***

**Public
with Confidential Annex A**

Public Redacted Version of “Prosecution’s fourth request to introduce prior recorded testimony pursuant to rule 68(2)(b)”, ICC-01/14-01/21-319-Conf, dated 19 May 2022

Source: Office of the Prosecutor

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

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I. INTRODUCTION

1. The Prosecution hereby requests that Trial Chamber VI (“Chamber”) introduce into evidence the statement, transcripts of in-court testimony, and associated material (“Prior Recorded Testimony”)¹ of P-0966 (“Witness”), pursuant to rule 68(2)(b) of the Rules of Procedure and Evidence (“Request”).

2. The Prior Recorded Testimony is reliable, probative, and relevant to the charges. It does not reflect on the acts and conduct of Mahamat Said Abdel Kani (“Mr SAID”). Instead, it pertains solely to the chapeau elements of article 8 of the Rome Statute (“Statute”), namely, the existence of an armed conflict not of an international character. Specifically, the Witness is an insider of one party to that conflict, the pro-BOZIZE forces, which later became known as the Anti-Balaka (“Anti-Balaka”). The Witness provides relevant information about the organisation and activities of this group over the course of 2013, including their attacks against the Seleka in and around Bossangoa in September 2013 and their large scale attacks against the Seleka on 5 December 2013.

3. Introduction of the Prior Recorded Testimony would be in the interests of justice. The Prosecution estimates that it would save up to 8 hours of direct examination time. Granting the Request would accordingly enhance the expeditiousness of the proceedings and save valuable court time and resources.

4. Introduction of the Prior Recorded Testimony would not prejudice the rights of the Accused. They are cumulative to and corroborate the evidence of other witnesses who will testify live at trial about the same topics, including P-2232, P-2251, P-1339

¹ Annex A lists the Prior Recorded Testimony of P-0966. This is comprised of his witness statement and transcripts of his in-court testimony in the case of *Yekatom and Ngaissona* (at I), associated material (at II) and items which are necessary to understand his prior recorded testimony, but the Prosecution does not seek to introduce those items into evidence (at III). These materials are all hyperlinked (with exceptions as specified in Annex and authorised by the Trial Chamber’s email of 18 May 2022). See Directions on the conduct of the proceedings, ICC-01/14-01/21-251, para. 38(i)-(ii).

and P-0884, as well as documentary evidence that was produced by the government of the Central African Republic (“CAR”) or other independent sources. Furthermore, core areas of the Witness’s evidence have already been scrutinised by two other Defence teams during the Witness’s in-court testimony in the *Yekatom and Ngaissona* case in April 2022. The transcripts of that testimony are also proposed to be introduced into evidence in this Request.

II. CONFIDENTIALITY

5. Pursuant to regulation 23bis (1), the Request and its annexes are filed as confidential because they refer to the identities of Prosecution witnesses and confidential items of evidence. A public redacted version will be filed as soon as possible.

III. APPLICABLE LAW

6. The Prosecution relies on its previous submissions on the legal framework for the introduction of prior recorded testimony pursuant to rule 68(2)(b), as set out in its first application under rule 68(2)(b).²

7. Additionally, the Prosecution notes that the Trial Chamber in the *Ntaganda* case confirmed that a transcript of a witness’s prior in-court testimony in another case before the Court forms part of the witness’s prior recorded testimony.³

² Prosecution’s first request to introduce prior recorded testimony pursuant to rule 68(2)(b), ICC-01/14-01/21-289-Conf, 29 April 2022, paras. 7-10, 11 (fn. 8), 46-50.

³ *Ntaganda*, Decision on Prosecution application under rule 68(2)(c) of the Rules for admission of prior recorded testimony of P-0022, P-0041 and P-0103, ICC-01/04-02/06-1029, 20 Nov. 2015, paras. 29, 34, 39. This application was in relation to a rule 68(2)(c) request, but the Prosecution submits that the same logic applies to a rule 68(2)(b) request.

IV. SUBMISSIONS

A. The Prior Recorded Testimony Goes to Proof of Matters Other than the Acts and Conduct of the Accused.

8. The Prior Recorded Testimony does not mention Mr SAID or anything about his acts and conduct. Instead, as described below, the Prior Recorded Testimony details the activities and the organisation of the Anti-Balaka in 2013.

B. The Prior Recorded Testimony is Relevant and Probative.

9. The Prior Recorded Testimony is highly relevant as it relates to the chapeau elements of article 8 of the Statute, in relation to which the Prosecution bears the burden of proof. Specifically, P-0966 is an Anti-Balaka insider who possesses direct knowledge about the organisation and activities of this group over the course of 2013. His evidence further covers various armed clashes that took place between the Anti-Balaka and the Seleka in 2013, which gave rise to the fall of the Seleka regime in early 2014.⁴ Key aspects of the Witness's evidence are further highlighted below.

10. P-0966 [REDACTED] joined the Anti-Balaka movement in Gobere [REDACTED].⁵ Largely due to [REDACTED] as compared to other Anti-Balaka members in the group, the Witness was put in charge of [REDACTED].⁶ In line with the Anti-Balaka's strategy, the Witness participated in their attacks on the Seleka in Benzambe and Bossangoa prior to 5 December 2013.⁷ He was [REDACTED] of a

⁴ See Pre-Confirmation Brief, paras. 7, 45-46.

⁵ P-0966, CAR-OTP-2031-0241 at 0245, paras. 23-26.

⁶ P-0966, CAR-OTP-2031-0241 at 0247-0248, paras. 35-39; ICC-01/14-01/18-T-116-CONF-ENG ET, p. 14, ln. 23 – p. 19, ln. 10, p. 30, lns. 15-18.

⁷ P-0966, CAR-OTP-2031-0241 at 0248-0251, paras. 40-55.

company which took part in the Anti-Balaka's large scale attack on the Seleka on 5 December 2013 in Bossangoa.⁸

11. Of particular note, the Witness provides information about (i) the structure of the Anti-Balaka in place in Gobere, led by BOZIZE's ex-Presidential Guard named DEDANE in coordination with long-time BOZIZE ally Maxime MOKOM ("Anti-Balaka Gobere Group");⁹ (ii) recruitment of soldiers to the Anti-Balaka Gobere Group;¹⁰ (iii) training and provision of weapons and ammunitions to the Anti-Balaka Gobere Group;¹¹ (iv) financial support to the Anti-Balaka Gobere Group;¹² (v) an estimated number of the Anti-Balaka in the relevant time period;¹³ (vi) clashes with the Seleka before 5 December 2013 in various places in the CAR, including in Bouca, Lere, Benzambe and Bossangoa;¹⁴ and (vii) the Anti-Balaka's large scale attacks against the Seleka on 5 December 2013, including the one in Bossangoa in which he participated.¹⁵

12. P-0966's Prior Recorded Testimony includes his statement, transcripts of his oral testimony in the case of *Yekatom and Ngaissona*, and associated material.¹⁶

⁸ **P-0966**, CAR-OTP-2031-0241 at 0247, 0251, paras. 34, 58-59.

⁹ **P-0966**, CAR-OTP-2031-0241 at 0246-0248, 0251, paras. 28-39, 56; ICC-01/14-01/18-T-116-CONF-ENG ET, p. 19, lns. 4-10, p. 28, lns. 21-22, p. 50, lns. 13-25; ICC-01/14-01/18-T-117-ENG ET, p. 25, lns. 18-23, p. 26, lns. 9-16, p. 35, ln. 5, p. 37, ln. 22 – p. 39, ln. 2, p. 41, lns. 12-20, p. 42, ln. 24 – p. 44, ln. 16; ICC-01/14-01/18-T-119-ENG ET, p. 11, lns. 4-20.

¹⁰ **P-0966**, CAR-OTP-2031-0241 at 0247-0248, 0251, paras. 35-36, 38, 59; ICC-01/14-01/18-T-116-CONF-ENG ET, p. 15, ln. 4 – p. 19, ln. 10, p. 26, ln. 20 – p. 27, ln. 4.

¹¹ **P-0966**, CAR-OTP-2031-0241 at 0250, para. 51; ICC-01/14-01/18-T-116-CONF-ENG ET, p. 27, lns. 8-11, p. 36, ln. 12 – p. 38, ln. 8 ; ICC-01/14-01/18-T-117-ENG ET, p. 8, lns. 2-10, p. 53, ln. 25 – p. 54, ln. 7; ICC-01/14-01/18-T-118-CONF-ENG ET, p. 58, lns. 4-14.

¹² **P-0966**, CAR-OTP-2031-0241 at 0253, para. 68; ICC-01/14-01/18-T-117-ENG ET, p. 10, lns. 5-11.

¹³ **P-0966**, CAR-OTP-2031-0241 at 0246, para. 29.

¹⁴ **P-0966**, CAR-OTP-2031-0241 at 0248-0251, paras. 40-58; ICC-01/14-01/18-T-116-CONF-ENG ET, p. 48, ln. 25 – p. 49, ln. 8, p. 50, ln. 10-25, p. 52, lns. 18-23; ICC-01/14-01/18-T-117-ENG ET, p. 43, ln. 15 – p. 44, ln. 1; ICC-01/14-01/18-T-118-CONF-ENG ET, p. 61, lns. 13-25.

¹⁵ **P-0966**, CAR-OTP-2031-0241 at 0251-0252, paras. 59-67; ICC-01/14-01/18-T-116-CONF-ENG ET, p. 41, ln. 11 – p. 46, ln. 6, p. 49, lns. 8-20.

¹⁶ See Annex A for the complete list.

C. The Prior Recorded Testimony Has Sufficient Indicia of Reliability.

13. The Prior Recorded Testimony has the necessary indicia of reliability for introduction into evidence. The Witness has signed his statement, attesting that his testimony was read back to him, was given voluntarily, and that its content was true to the best of his recollection of the events.¹⁷ The Witness confirmed that he read over the statement with the interpreter and confirmed its accuracy.¹⁸ The Witness's statement also bears the signature of an interpreter, certifying that the Witness appeared to have heard and understood the translation.¹⁹ During his oral testimony in the case of *Yekatom and Ngaissona*, the Witness reconfirmed the accuracy and voluntary nature of his statement with limited corrections under oath,²⁰ in front of Trial Chamber V, as part of the rule 68(3) procedure.²¹ His statement is further coherent and internally consistent.

14. The transcripts of the Witness's in-court testimony in the *Yekatom and Ngaissona* case equally bear sufficient indicia of reliability. The Witness testified under oath,²² and he adhered to his own recollection of the events without speculating on matters outside his realm of knowledge. For example, the Witness admitted when he was unsure and could not answer because he did not know or could not recall.²³ Similarly, when he was shown documents which he did not author or had not seen before, he

¹⁷ **P-0966**, CAR-OTP-2031-0241 at 0263.

¹⁸ **P-0966**, CAR-OTP-2031-0241 at 0263.

¹⁹ **P-0966**, CAR-OTP-2031-0241 at 0264.

²⁰ See **P-0966**, CAR-OTP-2135-2583 for the corrections made before his testimony; ICC-01/14-01/18-T-116-CONF-ENG ET p.6, ln. 20 – p. 7, ln. 3.

²¹ **P-0966**, ICC-01/14-01/18-T-116-CONF-ENG ET, page. 6, ln. 9 – page. 7, ln. 6.

²² **P-0966**, ICC-01/14-01/18-T-116-CONF-ENG ET, page. 4, lns. 2-10.

²³ See e.g., **P-0966**, ICC-01/14-01/18-T-116-CONF-ENG ET, p. 11, lns. 20-24, p. 13, lns. 18-25, p. 30, lns. 10-22, p. 54, lns. 14-15, p. 55, lns. 4-11; ICC-01/14-01/18-T-117-ENG ET, p. 15, ln. 25 – p. 16, ln. 8, p. 30, lns. 1-6, p. 56, lns. 11-23.

testified as such candidly.²⁴ P-0966's oral testimony is further coherent and internally consistent, and in conformity with his statement.

15. More importantly, his evidence was scrutinised meticulously by two separate Defence teams during their three-day cross-examination under the control of Trial Chamber V.²⁵ Both Defence teams questioned the Witness thoroughly on the issues and events in the period of 2013,²⁶ covering matters directly pertinent to the present case.²⁷

16. The events mentioned by the Witness, including the Anti-Balaka's clashes with the Seleka in Bossangoa, Bouca, Lere and Benzambe, are further corroborated by other documentary and visual evidence.²⁸ The Witness generally distinguishes between information about which he has direct knowledge and information that he acquired from other sources.²⁹

D. The Prior Recorded Testimony is Cumulative to or Corroborative of Other Evidence, including that of *Viva Voce* Witnesses Who Can Be Cross-Examined by the Defence.

²⁴ See e.g., **P-0966**, ICC-01/14-01/18-T-116-CONF-ENG ET, p. 24, ln. 17 - p. 25, ln. 2; ICC-01/14-01/18-T-118-CONF-ENG, p. 31, lns. 19-23.

²⁵ **P-0966**, ICC-01/14-01/18-T-117-ENG ET; ICC-01/14-01/18-T-118-CONF-ENG ET; ICC-01/14-01/18-T-119-ENG ET.

²⁶ **P-0966**, ICC-01/14-01/18-T-117-ENG ET, pp. 3-68; ICC-01/14-01/18-T-118-CONF-ENG ET, pp. 3-13, 55-61; ICC-01/14-01/18-T-119-ENG ET, pp. 6-11.

²⁷ See *infra*, para. 24.

²⁸ See, e.g., **B2 document**: CAR-OTP-2075-0978 [REDACTED]; **B2 document**: CAR-OTP-2075-0985 [REDACTED]; **B2 document**: CAR-OTP-2075-0988 [REDACTED]; **B2 document**: CAR-OTP-2075-0995 [REDACTED]; **B2 document**: CAR-OTP-2075-1001 at 1004 [REDACTED]; **B2 document**: CAR-OTP-2075-1008 [REDACTED]; **Primature document**: CAR-OTP-2100-1790 [REDACTED]; **National Security Council Meeting document**: CAR-OTP-2101-3086 at 3091-3092 [REDACTED]; **Media article**: CAR-OTP-2061-1427 (reporting the BOZIZE supporter's attack on the Seleka in Bossangoa, dated 9 September 2013); **Video**: CAR-OTP-2081-1769 (transcript and translation at CAR-OTP-2107-6939; CAR-OTP-2122-2313) [REDACTED]; **IPIS Report**: CAR-OTP-2001-5739 at 5788 (reporting the Anti-Balaka's attacks in and around Bossangoa in August / September 2013, and their subsequent larger attacks on Bangui and Bossangoa on 5 December 2013).

²⁹ See, e.g., **P-0966**, CAR-OTP-2031-0241 at 0247, 0256, paras. 34, 85; ICC-01/14-01/18-T-117-ENG ET, p. 33, ln. 15 – p. 34, ln. 1.

17. The Prior Recorded Testimony is cumulative to or corroborative of other evidence, including the evidence of witnesses whom the Prosecution will call to testify live. The Prosecution plans to call as live witnesses the following four pro-BOZIZE insiders who are expected to give evidence on the same topics as P-0966:

- **P-2232** - a key pro-BOZIZE insider [REDACTED];
- **P-2251** - a member of the Anti-Balaka Gobere Group who [REDACTED] in clashes with the Seleka in Bossangoa and its surrounding area before 5 December 2013 and further [REDACTED] in the Anti-Balaka's 5 December 2013 attack in Bangui against the Seleka;
- **P-1339** - [REDACTED]; and
- **P-0884** - an important Anti-Balaka figure [REDACTED] from Cameroon and Bangui and [REDACTED] in Anti-Balaka's 5 December 2013 attack against the Seleka in Bangui; he also provide information about the Anti-Balaka activities in Gobere and clashes in the area around Bossangoa in 2013.

18. Furthermore, the Prosecution proposes to call *viva voce* at trial at least three other witnesses whose testimony will cover the organisation and activities of the Anti-Balaka in 2013, though from a more external perspective. These witnesses are P-0342 (a journalist who visited Bossangoa and its surrounding area in September 2013), P-2328, and P-0291 (the latter two were both [REDACTED] during the Seleka regime). The accounts of these three witnesses [REDACTED].

19. The Prior Recorded Testimony is further cumulative to and corroborates other evidence. Such evidence includes the evidence of witnesses whose testimony the

Prosecution will seek to introduce through rule 68(2)³⁰ as well as documentary and visual evidence, including public reporting and official documents produced contemporaneously by the government of the CAR in 2013.³¹

E. The Prior Recorded Testimony Largely Relates to Background Information

20. As noted above, the Witness does not provide any linkage evidence to Mr SAID, but purely relates to background information of the conflict and chapeau elements of article 8 of the Statute. The Prosecution submits that the *factual* allegations put forth by the Witness are unlikely to be materially in dispute. Rather, any matters of significant dispute are likely to be about the *legal significance* or characterisation of those factual allegations.

21. The Defence can explore its themes in this regard during cross-examination of the many other Prosecution witnesses who will give testimony live about the topic. Furthermore, the Defence will have the opportunity to develop this line of legal argument in its oral and written submissions in response to the Prosecution's case, or by calling its own witnesses.

F. The interests of justice would be served by introducing the Prior Recorded Testimony.

22. The interests of justice would be advanced by the introduction of the Prior Recorded Testimony via rule 68(2)(b). The Prosecution estimates that granting the Request would result in a savings of approximately 8 hours of direct examination time, thereby expediting the proceedings. It would also reduce the amount of time the

³⁰ The Prosecution presently plans to apply for the introduction of prior recorded testimonies of two other Anti-Balaka insiders—*i.e.*, P-0975 and P-2269—through rule 68(2) after their in-court testimony in the *Yekatom and Ngaissona* case, as authorized by the Chamber (*see* Decision on Requests to Vary the Time Limits pertaining to the Introduction of Prior Recorded Testimony of Witnesses pursuant to Rule 68 (ICC-01/14-01/21-300-Conf-Red and ICC-01/14-01/21-291), ICC-01/14-01/21-305, 11 May 2022, para. 17).

³¹ *See supra*, para. 16 (fn. 28).

Chamber would spend hearing a repetition of the same type of evidence on the same topics from other witnesses as well as the Witness himself, particularly in light of the fact that he has already testified extensively in the *Yekatom and Ngaissona* case. Furthermore, the Witness would be saved the disruption of having to travel to appear in court, and the Court would preserve valuable resources that could be used for other purposes.

G. Introduction of the Prior Recorded Testimony is not prejudicial to or inconsistent with the rights of the accused.

23. Introducing the evidence of the Witness under rule 68(2)(b) is not prejudicial to or inconsistent with the rights of Accused. As noted above, this evidence is cumulative or corroborative of other evidence.

24. More importantly, and as stated above, the lack of necessity for the Defence to cross-examine P-0966 in the present case is further supported by the fact that he has already been cross-examined extensively by two Defence teams in a separate ICC case. Specifically, on 4, 5, 6 and 7 April 2022, the Witness testified in the *Yekatom and Ngaissona* case, and the two Defence teams were given a three days for his cross-examination.³² During the cross-examination, both Defence teams questioned the Witness thoroughly and substantially on the issues and events in the period of 2013,³³ covering matters directly pertinent to the present case. Specifically, the Witness was questioned about: (i) weapons and ammunitions of the Anti-Balaka Gobere Group;³⁴ (ii) financial support to the Anti-Balaka Gobere Group;³⁵ (iii) communication tools and

³² **P-0966**, ICC-01/14-01/18-T-117-ENG ET; ICC-01/14-01/18-T-118-CONF-ENG ET; ICC-01/14-01/18-T-119-ENG ET.

³³ **P-0966**, ICC-01/14-01/18-T-117-ENG ET, pp. 3-68; ICC-01/14-01/18-T-118-CONF-ENG ET, pp. 3-13, 55-61; ICC-01/14-01/18-T-119-ENG ET, pp. 6-11.

³⁴ See e.g., **P-0966**, ICC-01/14-01/18-T-117-ENG ET, p. 4, lns. 7-15, p. 7, lns. 3-5, p. 14, ln. 16 – p. 15, ln. 24, p. 53, ln. 20 – p. 55, ln. 2; ICC-01/14-01/18-T-118-CONF-ENG ET, p. 57, ln. 9 – p. 58, ln. 14.

³⁵ See e.g., **P-0966**, ICC-01/14-01/18-T-117-ENG ET, p. 9, ln. 22 – p. 10, ln. 4.

methods available to the Anti-Balaka Gobere Group;³⁶ (iv) recruitment of soldiers to the Anti-Balaka Gobere Group;³⁷ (v) living conditions in Gobere;³⁸ (vi) coordination among the Anti-Balaka Gobere Group members;³⁹ (vii) strategy of their attacks on the Seleka;⁴⁰ (viii) commanders who instructed the attacks on the Seleka;⁴¹ (xi) methods in which commanders' instructions were given to their elements;⁴² and (x) methods in which the information of the Anti-Balaka in Gobere was transmitted to Maxime MOKOM in Zongo.⁴³ The Defence teams further scrutinized the Witness's evidence on the topic of armed clashes with the Seleka in 2013, including on: (xi) the Seleka's attack on the Anti-Balaka Gobere Group near Bossangoa;⁴⁴ (xii) the Anti-Balaka's attacks on the Seleka in Benzembe and Bossangoa before 5 December 2013 in which the Witness personally participated;⁴⁵ and (xiii) the Anti-Balaka's attack on the Seleka on 5 December 2013 in Bossangoa, in which again the Witness was directly involved.⁴⁶

25. Furthermore, the Defence is unrestricted in its ability to call evidence to rebut the assertions of the Witness or to address any issues in the evidence in its oral or written submissions. The Defence will also be able to cross-examine other Prosecution witnesses that will testify live before the Chamber about the same topics as those referred to by the Witness. As noted above, these witnesses include other pro-BOZIZE insiders like P-2232, P-0884, P-1339 and P-2251, as well as [REDACTED] like P-0342, P-2328, and P-0291.

³⁶ See e.g., **P-0966**, ICC-01/14-01/18-T-117-ENG ET, p. 15, ln. 25 – p. 16, ln. 1; ICC-01/14-01/18-T-118-CONF-ENG ET, p. 59, ln. 10 – p. 60, ln. 6.

³⁷ See e.g., **P-0966**, ICC-01/14-01/18-T-117-ENG ET, p. 16, lns. 9-13, p. 18, lns. 18-20, p. 20, ln. 7 – p. 21, ln. 5.

³⁸ See e.g., **P-0966**, ICC-01/14-01/18-T-117-ENG ET, p. 42, lns. 12-14 ; ICC-01/14-01/18-T-118-CONF-ENG ET, p. 60, ln. 7 – p. 61, ln. 25.

³⁹ See e.g., **P-0966**, ICC-01/14-01/18-T-117-ENG ET, p. 25, lns. 10-17, p. 26, lns. 7-8.

⁴⁰ See e.g., **P-0966**, ICC-01/14-01/18-T-117-ENG ET, p. 37, ln. 22 - p. 39, ln. 2.

⁴¹ See e.g., **P-0966**, ICC-01/14-01/18-T-117-ENG ET, p. 38, lns. 16-17, p. 43, lns. 9-14.

⁴² See e.g., **P-0966**, ICC-01/14-01/18-T-117-ENG ET, p. 44, lns. 2-4.

⁴³ See e.g., **P-0966**, ICC-01/14-01/18-T-119-ENG ET, p. 9, lns. 1-21.

⁴⁴ See e.g., **P-0966**, ICC-01/14-01/18-T-118-CONF-ENG ET, p. 61, lns. 13-14.

⁴⁵ See e.g., **P-0966**, ICC-01/14-01/18-T-117-ENG ET, p. 53, ln. 20 – p. 57, ln. 5.

⁴⁶ See e.g., **P-0966**, ICC-01/14-01/18-T-117-ENG ET, p. 57, ln. 6 – p. 64, ln. 14; ICC-01/14-01/18-T-118-CONF-ENG ET, p. 3, ln. 16 – p. 9, ln. 23.

26. In these circumstances, it is unnecessary that the Witness be called to testify live, and examination by the Parties may be dispensed of without prejudicing the rights of the Accused.

V. RELIEF SOUGHT

27. For the above reasons, the Prosecution requests that the Chamber introduce into evidence the Prior Recorded Testimony, as set out in Annex A to this filing, subject to the fulfilment of rules 68(2)(b)(ii) and (iii).

A handwritten signature in blue ink, appearing to read 'K.A.Khan', with a horizontal line underneath it.

Karim A. A. Khan QC, Prosecutor

Dated this 2nd day of June 2022
At The Hague, The Netherland