

**Cour
Pénale
Internationale**



**International
Criminal
Court**

Original: **English**

No.: ICC-01/04-02/06
Date: **19 February 2021**

TRIAL CHAMBER VI

Before: Judge Chang-ho Chung, Presiding Judge
Judge Robert Fremr
Judge Olga Herrera Carbuccion

SITUATION IN THE DEMOCRATIC REPUBLIC OF THE CONGO

**IN THE CASE OF
*THE PROSECUTOR V. BOSCO NTAGANDA***

Public

Public Redacted Version of “Confidential redacted version of “Notice on behalf of Mr NTAGANDA setting out difficulties encountered in relation to the conduct of investigations” filed on 13 April 2015”, 3 July 2015, ICC-01/04-02/06-555-Conf-Exp-Red3

Source: Defence Team of Mr Bosco Ntaganda

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

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Legal Representatives of Victims

Legal Representatives of Applicants

Unrepresented Victims

**Unrepresented Applicants
(Participation / Reparation)**

**The Office of Public Counsel for
Victims**

**The Office of Public Counsel for the
Defence**

States' Representatives

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REGISTRY

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Mr Peter Lewis

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Victims and Witnesses Unit

Mr Nigel Verrill

Detention Section

**Victims Participation and Reparations
Section**

Further to the submission of the "*Urgent request on behalf of Mr NTAGANDA seeking to postpone the presentation of the Prosecution's Case until 2 November 2015 at the earliest with Public Annex A*" on 2 April 2015 ("Request to Postpone"), Counsel representing Mr NTAGANDA ("Mr NTAGANDA" or "Defence") hereby submit this:

**Notice on behalf of Mr NTAGANDA setting out difficulties encountered in
relation to the conduct of investigations**

"Defence Notice"

INTRODUCTION

1. On 2 April 2015, Mr NTAGANDA submitted a request seeking to postpone the presentation of the Prosecution's Case until 2 November 2015 at the earliest.¹
2. One of the main reasons put forward by Mr NTAGANDA in his Request to Postpone is the inability of the Defence to adequately investigate the evidence expected to be adduced by the Prosecution with a view to being ready for the presentation of the Prosecution's Case on 2 June 2015.
3. In this regard and as mentioned in the Defence Request to Postpone, Mr NTAGANDA takes this opportunity to inform the Chamber, on an *ex parte* basis, of difficulties encountered which have impacted the ability of the Defence to conduct meaningful investigations to this day.
4. This Defence Notice addresses the following issues:
 - I) The fact that few Defence investigative activities were conducted during a period of [REDACTED] months;
 - II) Difficulties encountered in recruiting suitable Defence investigators/resource persons;
 - III) Inadvertent contacts with Prosecution witnesses;

¹ ICC-01/04-02/06-541-Conf-Exp + AnxA, Urgent request on behalf of Mr NTAGANDA seeking to postpone the presentation of the Prosecution's Case until 2 November 2015 at the earliest with Public Annex A, 2 April 2015, ("Request to Postpone").

- IV) Recruitment by the Prosecution of a witness having previously cooperated extensively with the Defence;
- V) Difficulties encountered in securing witnesses for the Defence;
- VI) The impact of the non-disclosure of relevant information to the Defence;
- VII) Allegations of Defence interference with witnesses and others;
- VIII) The investigations which need to be conducted in order to be ready for the presentation of the Prosecution's Case.

5. This Defence Notice also addresses briefly the Prosecution's expected arguments opposing the Defence Request to Postpone, set out in its 7 April 2015 request seeking to delay disclosure to the Defence of its first list of witnesses it intends to call² (Section IX).

CONFIDENTIALITY

6. Pursuant to Regulation 23*bis* (1) and (2), this Defence Notice is submitted on an *ex parte* basis –only available to the Chamber and the Defence – as it: (i) provides detailed confidential and sensitive information directly related to the conduct of investigations by the Defence; and (ii) it follows the submission by the Defence of its confidential and *ex parte* – only available to the Chamber and to the Defence– Request to Postpone. Although the Defence Notice has been submitted *via* the Registry, it is not to be communicated to the Victims and Witnesses Unit ("VWU").

I. The fact that few Defence investigative activities were conducted during a period of approximately nine months

7. [REDACTED]³

8. [REDACTED]

² ICC-01/04-02/06-551-Red, Public Redacted Version of Response on behalf of Mr NTAGANDA to Prosecution's request for variation of the Chamber's direction to provide the order of the Prosecution's first witnesses, 8 April 2015, ("Response to Prosecution Request for Variation of the Chamber's Direction").

³ Request to postpone, para 49.

9. Immediately upon being assigned, the new Lead Counsel had to address the Prosecution's urgent request to impose restrictions on Mr NTAGANDA's communications pursuant to Regulation 101(2) of the Regulations of the Court 101 ("RoC").⁴ As mentioned in the Defence Request to Postpone,⁵ considerable time and resources were required to respond the Prosecution Urgent Request for Restrictions. In addition, the new Lead Counsel unfortunately had to enter into litigation with the Registry for the purpose of obtaining additional resources for the Defence, while at the same time searching for a suitable investigator, from The Hague. Consequently, no investigative activities could be conducted in the field until 3 to 11 December 2014.

10. The fact that almost no investigative activities took place between March 2014 and November 2014, seriously impacted the ability of the Defence to be able to be ready for the presentation of the Prosecution's Case by 2 June 2015

II) Difficulties encountered in recruiting suitable Defence investigators/ resource persons

A) First Defence request for the assignment of an investigator

11. [REDACTED]

12. [REDACTED]

13. [REDACTED]

14. [REDACTED]

B) Second Defence request for the assignment of an investigator and a resource person

⁴ICC-01/04-02/06-349-Conf-Exp, Confidential Redacted Version of Prosecution's urgent request for measures under regulation 101(2) of the Regulations of the Court, dated 8 August 2014, 8 August 2014, ("Prosecution Urgent Request for Restrictions").

⁵Request to postpone, paras 66-67.

15. [REDACTED]
16. [REDACTED]
17. [REDACTED]
18. [REDACTED]. The purpose of providing Mr Logo with this information was to assist him with his future work. [REDACTED]⁶
19. [REDACTED]⁷
20. [REDACTED]

III) Inadvertent contacts with Prosecution witnesses

21. During the conduct of the second investigative mission, the Defence investigator and the Defence resource person inadvertently contacted or attempted to contact Prosecution witnesses on three occasions. Even though these inadvertent contacts or attempted contacts were immediately reported to the Prosecution, they resulted in the Defence having to temporarily put on hold its investigative activities for the purpose of reviewing its internal procedures to prevent the reoccurrence of similar events.

22. Significantly, the inadvertent contacts or attempted contacts described below can be attributed to a large extent to the nature and lack of information communicated to Mr Logo and [REDACTED] by the Defence.

A) [REDACTED] - P-0190

23. [REDACTED]. Mr Logo and [REDACTED] were provided requested to attempt scheduling a meeting between the Defence and a person called [REDACTED]. The information they were provided with included the following:

⁶ [REDACTED].

⁷ [REDACTED].

“[REDACTED]” referring to a person residing in Bunia who had the call sign “[REDACTED]” during the event which took place in Ituri in 2002-2003.

24. When requesting Mr Logo and [REDACTED] to arrange a meeting with [REDACTED], the Defence did not realize that the name of the Prosecution witness P-0190 was also [REDACTED].

25. On the basis of the information that he was provided with, [REDACTED] – who had not been informed of the identity of the Prosecution witness⁸ – confused the person called “[REDACTED]” with a person he is familiar with, namely “[REDACTED]” who is actually Prosecution witness (P-0190).

26. On February 2015, [REDACTED] contacted “[REDACTED]” by telephone for the purpose of setting up a meeting on 6 March 2015 in [REDACTED]. “[REDACTED]” informed [REDACTED] that he was willing to meet with the Defence, not mentioning that he was a Prosecution witness.

27. On 18 February 2015, after meeting with Mr Logo who had just arrived in Bunia, [REDACTED] again contacted “[REDACTED]” by telephone for the purpose of setting a meeting on 6 March 2015 in [REDACTED]. [REDACTED]

28. [REDACTED]

29. [REDACTED]

30. [REDACTED]

31. [REDACTED]

32. [REDACTED]

33. [REDACTED]

⁸ [REDACTED].

34. On the same day, the Defence informed the Prosecution by email that its investigator had inadvertently contacted and met with one of its witnesses, namely P-0190 (Annex H)

35. On 11 March 2015, at the Prosecution's request, a meeting was organized to further discuss the inadvertent contact reported with P-0190.

36. During this meeting, the Prosecution informed the Defence of additional information it was allegedly provided with regarding possible interference with its witnesses. However, the Prosecution did not provide any information regarding its new allegations.

37. Nevertheless, the Prosecution stated that witness P-0190 had complained that when speaking with [REDACTED] – whose name the Prosecution managed to obtain from unknown sources – he was told that he would have to 'switch sides' in order to meet with the Defence.

38. Reacting immediately, the Defence informed the Prosecution that according to its information, it was in fact witness P-0190 who requested a financial advantage to testify when meeting with Mr Logo, its investigator, and that nothing of the sort was discussed between [REDACTED] and P-0190.

B) [REDACTED] - P-0067

39. [REDACTED]

40. [REDACTED]⁹

41. [REDACTED]

42. [REDACTED]

43. [REDACTED]

⁹ [REDACTED].

44. On 12 March 2015, having returned from its second investigative mission, the Defence realized for the first time that [REDACTED] had been added to the Prosecution's list of witnesses. Accordingly, on 13 March 2015, the Defence informed the Prosecution of the failed inadvertent attempt to contact [REDACTED], both orally as well as by email (Annex I).

C) [REDACTED] - P-0901

45. [REDACTED]

46. [REDACTED]

47. [REDACTED]

48. [REDACTED]

49. [REDACTED]

50. [REDACTED]

51. [REDACTED]

52. [REDACTED]

53. Notwithstanding the above, on 27 March 2015, when meeting with the Prosecution as a follow-up to the First Registry Report on Mr NTAGANDA's communications for the purpose of discussing how best to ensure the protection of witnesses,¹⁰ the Defence reported this inadvertent contact with [REDACTED].

54. [REDACTED]

D) Measures taken by the Defence to avoid future inadvertent contacts with Prosecution witnesses

¹⁰ ICC-01/04-02/06-533-Conf-Exp + Conf-Anxs, Observations on behalf of Mr NTAGANDA on the post factum review of the phone conversations made by Mr NTAGANDA, 25 March 2015, ("Observation on Post-Factum Review of Phone Conversation").

55. In order to avoid future inadvertent contacts with Prosecution witnesses, the Defence has taken many measures including, in particular, issuing guidelines to its investigator and resource person and closely monitoring their work.

56. Needless to say, taking these measures created an additional burden for the Defence and also reduced the pace of investigative activities conducted.

57. That said, the Defence deems important to underscore two specific measures taken. Firstly, Mr NTAGANDA agreed with the suggestion of the Defence not to have any contact with Mr Logo or [REDACTED] to ensure that they would receive their instructions from one source only. Secondly, Mr Logo and [REDACTED] have been instructed to always ask any person they meet in the performance of their activities – immediately at the beginning – whether that person has previously been met by anyone from the Court and whether that person is a Prosecution witness.

58. Unfortunately, some Prosecution witnesses as well as persons never met by the Prosecution have refrained from answering this question, thereby causing undesirable situations.

59. Accordingly, the Defence has invited the Prosecution to instruct its witnesses to either truthfully answer the question or to find a way to put an end to the encounter with the Defence investigator or resource person before providing any information.

60. The Defence respectfully submits that the Prosecution should be encouraged, if not ordered, to do so.

VI) Recruitment by the Prosecution of a witness having previously cooperated extensively with the Defence

61. [REDACTED]

62. [REDACTED]

63. [REDACTED]

64. [REDACTED]

65. [REDACTED]

66. [REDACTED]

67. [REDACTED]

68. [REDACTED].

69. [REDACTED]

70. [REDACTED]

71. [REDACTED]

72. [REDACTED]

73. [REDACTED]

V) Difficulty encountered in securing witnesses for the Defence

74. In addition to the above, a further issue has directly affected the ability of the Defence to investigate and, at a minimum, results in more time being required to properly do so.

75. This issue is related to the time elapsed since the events which give rise to the proceedings against Mr NTAGANDA and which took place in 2002 and 2003. The reason for this is that many actors in these events, who are in a position to provide exculpatory evidence today, have moved with their lives such that they have no incentive and certainly no advantage to gain by assisting the Defence.

76. In fact, even if they were close to the Accused at the time and would like to assist him in presenting his defence, many of the most potential witnesses for the Defence have everything to lose by cooperating in any way with Mr NTAGANDA.

77. This applies in particular to potential witnesses who are now officers in the *Forces armées de la République du Congo* ("FARDC") due to the fact that the current Government in DRC is the same central Government that was in power at the time and which was opposed to numerous rebel groups existing at the time, including the UPC/FPLC.

78. It is also significant in this regard that the current Government of the DRC is the Government which actually referred the situation in the RDC to the Court.

79. In addition, the Defence wishes to underscore the fact that in order to meet with any potential witness now working for the Government of the DRC, whether military or civilian, an official request must be submitted, which significantly delays the conduct of investigative activities.

80. In this area, the disparity in the support which can be obtained by the Prosecution from the Government of the DRC and which can be obtained by the Defence, makes considerable difference. If only for this reason, the Chamber should consider granting the Defence at least as much time to investigate as that used by the Prosecution for the same purpose.

VI) The impact of the non-disclosure of relevant information to the Defence

81. Since the beginning of the proceedings against Mr NTAGANDA, it has been a standard and repetitive practice of the Prosecution and the Registry not to disclose important information to the Defence.

82. Notwithstanding the legitimacy of this practice – i.e. whether or not information was kept from the Defence for valid reasons and/or pursuant to orders issued by the Chamber – which is altogether a different issue, the Defence respectfully submits that the non-availability of critical information impacted and continues to affect its ability to investigate.

83. To provide but one significant example, in addition to the delayed disclosure of Prosecution evidence and the non standard redactions approved by the Chamber, no less than seven submissions¹¹ have been addressed to the Chamber during the period from 29 December 2014 to 7 April 2015 – a period of a little more than three months – without any information being provided to the Defence.

84. Indeed, in respect of these eight submissions, no information whatsoever has been provided to the Defence regarding the subject matter, the identity of the submitting entity, the contents or the arguments raised therein.

85. Taking into consideration the serious allegations raised by the Prosecution and VWU concerning the illicit disclosure of confidential information and the interference/intimidation of witnesses (further addressed below), the existence of unknown information and/or arguments provided to the Chamber – which might have serious consequences for Mr NTAGANDA and affect the ability of the Defence to adequately represent him – places the Defence in an untenable position.

86. As a result, although it is doing its best to fulfil its duty and obligations diligently, in full observance of all existing rules, regulations and applicable protocols, the Defence has had to use a significant portion of its time and limited resources focusing on its internal procedures as well as on external issues unrelated to the merits of the Prosecution's Case against Mr NTAGANDA.

87. For example, much of the work accomplished by the Defence working with: (i) Mr NTAGANDA; (ii) its investigator and resource persons; and (iii) persons met during the course of its investigations was focussed on issues not related to the substance of the Prosecution's Case.

88. In sum, the non-disclosure of highly relevant information to the Defence, including: (i) the vast quantity of information redacted in the Prosecution's written

¹¹ ICC-01/04-02/06-422; ICC-01/04-02/06-463; ICC-01/04-02/06-472; ICC-01/04-02/06-488; ICC-01/04-02/06-513; ICC-01/04-02/06-532; ICC-01/04-02/06-546.

submissions as well as in the material disclosed by the Prosecution; and (ii) the unknown information and submissions addressed to the Chamber in *ex parte* fillings, resulted in longer and more complex investigations, thereby imposing an additional burden on the Defence.

VI) Allegations of Defence interference with witnesses and others

89. In addition to allegations raised by the Prosecution in its Prosecution Urgent Request for Restrictions as well as in numerous other Prosecution submissions addressed to the Chamber,¹² further allegations of interference with witnesses and others by the Accused/Defence have been brought to the attention of the Defence by the Prosecution and VWU.

90. [REDACTED]

91. As a result of the above, the Defence has had to invest significant time and resources in addressing these allegations and concerns, which impeded its ability to investigate and continues to do so.

A) Prosecution allegations

92. As part of its preparations for trial, the Defence meets with the Prosecution on a regular basis to discuss a variety of issues. The Defence believes in the importance

¹² ICC-01/04-02/06-349-Conf-Red, Confidential Redacted Version of Prosecution's urgent request for measures under regulation 101(2) of the Regulations of the Court, dated 8 August 2014, 8 August 2014; [REDACTED]; ICC-01/04-02/06-368-Conf, Prosecution's Reply to «Réponse/Observations de M. Bosco Ntaganda à la Demande du Procureur pour l'imposition de mesures de prévues à la Norme 101 52° du Règlement de la Cour», 12 September 2014; ICC-01/04-02/06-T-16-ENG, p. 5-6, lines 1-12., 23 October 2014; ICC-01/04-02/06-393-Conf-Red, Confidential Redacted Version of "Prosecution's Proposed Protocol on Redactions" dated 31 October 2014, 31 October 2014; ICC-01/04-02/06-409-Conf-Red, Prosecution submissions on conducting part of the trial in situ, 28 November 2014; [REDACTED]; ICC-01/04-02/06-371-Conf-Red + Conf-Anx A-Red, Prosecution's Submission of Additional Evidence in Support of "Prosecution's urgent request for measures under regulation 101(2) of the Regulations of the Court" dated 8 August 2014, 19 December 2014; [REDACTED]; ICC-01/04-02/06-440, Prosecution's Observations on the Review of the Pre-Trial Detention of Bosco Ntaganda, 3 February 2015; [REDACTED]; ICC-01/04-02/06-461-Conf-Red, Confidential redacted version of "Prosecution application for delayed disclosure", 16 February 2015, ICC-01/04-02/06-461-Conf-Exp; [REDACTED]; ICC-01/04-02/06-544-Conf-Exp, Prosecution's request for a variation of the Chamber's direction to provide the order of the Prosecution's first witnesses, 07 April 2015

of such meetings and intends to continue meeting with representatives of the Prosecution.

93. During some of these meetings, namely on 11 March, 13 March, 27 March, 2 April and 9 April 2015, the Prosecution informed the Defence of additional complaints brought to its attention regarding possible interference with its witnesses by persons allegedly acting on behalf of the Accused/Defence.

94. However, with the exception of the information provided to the Defence concerning witness P-0190 mentioned above¹³, the Prosecution provided no details in support of its allegations. It is also not known whether these allegations have been the object of *ex parte* submissions addressed to the Chamber. For the Defence, this is necessarily a cause of concern.

B) VWU allegations

95. In an email addressed to Mr NTAGANDA's Lead Counsel and Co-Counsel on 3 March 2015, VWU informed the Defence of information it was provided with, indicating that certain individuals claiming to have association with the Defence or the Accused have been approaching witnesses and others and may have threatened them. (Annex K)

96. In a further email addressed to the Defence on 27 March 2015, VWU recalled its earlier allegations (Annex K)

97. [REDACTED]

C) [REDACTED]

98. [REDACTED]¹⁴

99. [REDACTED]¹⁵

¹³ [REDACTED].

¹⁴ [REDACTED].

100. [REDACTED]

101. [REDACTED]¹⁶

102. [REDACTED]

103. [REDACTED]¹⁷

104. [REDACTED]

105. [REDACTED]

106. [REDACTED]

107. [REDACTED]

108. [REDACTED]

109. [REDACTED]

110. [REDACTED]

111. [REDACTED]

112. [REDACTED]

VII) The investigations which need to be conducted in order to be ready for the presentation of the Prosecution's Case

113. [REDACTED]

114. [REDACTED]

¹⁵ [REDACTED].

¹⁶ [REDACTED].

¹⁷[REDACTED]

115. [REDACTED]

116. [REDACTED]

117. [REDACTED]

118. [REDACTED]

119. [REDACTED]

120. [REDACTED]

121. [REDACTED]

IX) Addressing the Prosecution's expected arguments opposing the Defence Request to Postpone

122. In its Request seeking to delay disclosing to the Defence its first list of witnesses it intends to call at the beginning of its Case, the Prosecution informed the Chamber that it would oppose the "Defence's request for a five month delay to start trial, or to have the opening statements in June 2015 with a break in the trial proceedings thereafter."¹⁸

123. The Defence takes this opportunity to address the Prosecution arguments expected to be included in its response to the Defence Request to Postpone.

124. Firstly, the Defence wishes to underscore that it expects to be ready to present its opening statement on 2 June 2015. Moreover, taking into consideration that the proceedings against Mr NTAGANDA have been on the docket since August 2006, the Defence takes the view that it is in the interest of justice to proceed with the opening statements on 2 June 2015 and to postpone the beginning of the Prosecution's Case until 2 November at the earliest.

¹⁸ ICC-01/04-02/06-544-Conf-Exp, Prosecution's request for a variation of the Chamber's direction to provide the order of the Prosecution's first witnesses, 7 April 2014, para 7

125. This would *inter alia*, bring some finality to the scope of proceedings against Mr NTAGANDA and the incriminatory evidence that will be adduced against him.

126. Proceeding with the presentation of the Parties' opening statements in June and scheduling the beginning of the Prosecution's Case on 2 November 2015 will not prejudice the Prosecution in any way. In fact, this will allow both the Prosecution and the Defence to be much more focused in their examination and cross-examination of Prosecution's witnesses, thereby possibly shortening the trial.

127. However, the Defence respectfully submits that proceeding with the Prosecution's Case at a slow pace after the presentation of the opening statements on 2 June 2015, is neither in the interest of justice, nor a workable solution.

128. In fact, even if the Prosecution's Case was to begin at a reduced pace on 2 June 2015, this would necessarily entail a significant change in the organisation of the Defence's work, shifting from the present preparation mode to the trial mode. Significant resources would necessarily have to be devoted to preparing for the cross-examination of the first witnesses, thereby leaving limited resources to accomplish the essential tasks which need to be performed before trial, in particular, acquiring full knowledge and understanding of the Prosecution's Case and conducting the minimum required investigations to be able to challenge the evidence expected to be adduced from the beginning.

129. This would also place the Defence at a considerable disadvantage, constantly having to simultaneously conduct trial activities and investigative/trial preparation activities.

130. As for the Prosecution second proposition to delay the start of trial (including opening statements) for a more limited time, it is inappropriate and must be rejected.

131. Indeed, as set out in the Defence Request to Postpone, the numerous tasks to be performed to be ready for trial make it clear that a delay of five months is the bare minimum required.

132. Lastly, while the Prosecution is likely to suggest that the planned move of the Court from the present premises to its permanent location militates against a 2 November start date, this argument is without merit. The Court's move to its permanent premises will take place regardless of the starting date of the trial and there is no reason to make any connection between this event and the need to postpone the beginning of the presentation's Case. What is important however, regardless of when this move will take place, is to ensure that the time between the last hearing in the current location and the first hearing in the new location will be as short as possible. This is an entirely different issue.

CONCLUSION

133. While this Defence Notice addresses solely the difficulties encountered which have impeded Defence investigations and continue to affect its ability to be ready for the Presentation of the Prosecution's Case on 2 June 2015, the submissions and arguments presented above make it clear that the Defence will be seriously put at a disadvantage in the event the Prosecution's Case was to begin before 2 November 2015.

134. Defence investigative missions take a long time to organise. Unlike the Prosecution, the Defence neither has professional investigators, nor the necessary staff to handle the associated logistical requirements. What is more, in light of the Prosecution recent activities, the Defence must take additional measures to protect the confidentiality of its investigations. The investigative requirements identified therein must be compared with the investigative activities conducted by the Prosecution since 2005, a period of ten years, and more actively since 2012. Defence

investigative requirements must also be considered on the basis of the limited human and financial resources available.

135. The activities described above [REDACTED]. In this regard, the Chamber must also take into consideration the extensive work that must be performed by the members of the Defence team following the conduct of investigative missions.

136. In sum, allowing the Defence to the necessary time to conduct the necessary investigative activities is in the interest of justice less the Defence will not be in a position to properly challenge the Prosecution's evidence as it is adduced.

137. This would impede not only on the right of the Accused to prepare for trial but also on the right of the Accused to examine or have examined the witnesses against him in full respect of the principle of equality of arms.

RESPECTFULLY SUBMITTED ON THIS 19th DAY OF FEBRUARY 2021

A handwritten signature in dark ink, appearing to read 'StB' with a stylized flourish at the end.

Me Stéphane Bourgon, Counsel for Bosco Ntaganda
The Hague, The Netherlands