

Witness Statement of [REDACTED]

INTERNATIONAL CRIMINAL COURT  
DEFENCE FOR DOMINIC ONGWEN

WITNESS STATEMENT PROVIDED FOR THE PURPOSE OF TRIAL IN THE CASE  
OF  
*THE PROSECUTOR v DOMINIC ONGWEN*

Name: [REDACTED] Gender: Female  
Other Names Used: [REDACTED] Father's Name: [REDACTED]  
Place of Birth: [REDACTED] Uganda Mother's Name: [REDACTED]  
Date of Birth/Age: [REDACTED] Marital Status: Married  
Nationality: Ugandan Spouse: [REDACTED]  
Children: Two Place of Residence: [REDACTED]

Ethnic Origin/ Tribe: Lango

Religion: Protestant/Anglican

Language(s) spoken: [REDACTED]

Language(s) written (if different from spoken): [REDACTED]

Language(s) used in interview: English and Lango

Language of statement: English

Proposed language of testimony: Lango

Current Occupation: Farmer

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Language(s) spoken: [REDACTED]  
Language(s) written (if different from spoken): [REDACTED]  
Language(s) used in interview: English and Lango  
Language of statement: English  
Proposed language of testimony: Lango  
Current Occupation: Farmer

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Place of Interview: Lira, Uganda

Date(s) of interview: 31 June 2016

Start of Interview: Not recorded

End of Interview: Not recorded

Name and signature of individual(s) conducting the interview:

1. Tharcisse Gatarama, *Assistant to Counsel*
2. Roy Titus Ayena, *Case Manager*



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Names of all persons present during interview: (*witness, counsel, investigator, interpreter, legal assistant etc*):

1. Tharcisse Gatarama, *Assistant to Counsel*
2. Roy Titus Ayena, *Case Manager*
3. [REDACTED]

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Place of Interview: Lira, Uganda

Date(s) of interview: 29 April 2018

Start of Interview: 11h45 EAT

End of Interview: 13h30

Name and signature of individual(s) conducting the interview:

1. Thomas Obhof, *Assistant to Counsel*
2. Roy Titus Ayena, *Case Manager*



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Names of all persons present during interview: (*witness, counsel, investigator, interpreter, legal assistant etc*):

1. Thomas Obhof, *Assistant to Counsel*
2. Roy Titus Ayena, *Case Manager*
3. [REDACTED]

## WITNESS ACKNOWLEDGMENT

This statement consisting of eight pages is true to the best of my knowledge and recollection. I have given this statement voluntarily and I have not been influenced by any coercion, duress or threat.

I am aware that this statement may be used in legal proceedings before the International Criminal Court (the "ICC"). I understand that if I have knowingly provided false information, I may be liable to prosecution for false testimony under solemn declaration.

I have been informed by the interviewers about the procedures available to the ICC of ensuring the protection of confidential information provided to the Court. I have also been briefed about the procedures that may be available to ensure my own protection and security.

I have been informed that I may be called to testify in public before the ICC. I have also been informed that the ICC may exceptionally order protective measures on my behalf, provided such protection is required. Those interviewing me have also explained that even with protective measures, my identity will be disclosed to the Court and the parties. With knowledge of the above, I agree to testify and appear before the ICC if called to do so.


Signature:



Name:



Date: 29 April 2018

 - *Witness Statement*

*Initials* 

*Page 3 of 8*

1 **Witness Statement of [REDACTED]**

- 2 1. We heard about the LRA on [REDACTED] We heard bomb blasts coming from the eastern  
3 side. We began to see strangers entering the school, and there was a mad lady who was  
4 acting weird.
- 5 2. That night, the Head Mistress proposed to send some people back home, but she did not.  
6 At around [REDACTED] while I was in the dormitory, I realised that people had  
7 ambushed and attacked them. I opened the curtain and saw a young man who she thought  
8 was stealing. That boy came back with a big soldier who slapped me and ordered me out  
9 of the bed. When I stepped out, I found the girls tied up in a line and they tied me.
- 10 3. We went up to [REDACTED] very night and we were told to sit. They saw ladies running out  
11 of the houses and also men in underwear. They looted so many items and distributed it  
12 amongst us to carry. Since I was a school leader, I asked them a question about their  
13 behaviours. [REDACTED] was the girl given salt to carry.
- 14 4. That very night, we left towards the Eastern Route *via* a very big swamp which was very  
15 deep. On the way, the LRA would whip us to force us to move faster. We then arrived at  
16 some place deep in the bush where life became more difficult for us. The ropes were cut  
17 upon my request. I would whisper that if anyone gets a chance to escape, people should let  
18 them, and many of them managed to escape.
- 19 5. The next morning, I tried to escape. I ran towards the bush with a friend, [REDACTED], and  
20 we joined a small road. We then saw some other LRA soldiers, and we retreated and joined  
21 the line again. The soldiers came and asked who was trying to escape, and [REDACTED] and I  
22 were identified. They beat us seriously. [REDACTED] was beaten very badly, and she began  
23 bleeding. We were told that [REDACTED] case would serve as example.
- 24 6. We started moving again. When LRA commander wanted to communicate, they would  
25 throw a wire on the tree and begin reporting about the girls they had abducted on the radio  
26 call. I saw a tall, light skinned man who was talking over the radio and we heard him say  
27 that [REDACTED] myself and some other girls were going to be given to Vincent Otti. We went  
28 to Otti and looked after him and his household.
- 29 7. I kept hearing them communicate on the radio call, and one time they were to meet Abonga  
30 Papa. We were kept by Abonga for about two days. I heard someone over the radio call  
31 saying they were about to reach. They put us in a house and told us to line up according to  
32 our class. I joined the [REDACTED] line since I thought they would favour them and send them  
33 home. I was visibly excited and the soldiers even noticed. A lady told us that the others  
34 who were in the other group which was told to go back home would be killed on the way.  
35 We started the journey again and met [REDACTED] (a body guard to Joseph Kony) at the  
36 border of Uganda and Sudan. At that time we were told that we should not attempt to

1 escape because if we run into Sudan, the Dinka would kill us, and if we try to go back to  
2 Uganda the UPDF would rape and kill us.

3 8. We found a place to rest and we heard some people laughing, and I was called by a certain  
4 Okello, [REDACTED]. I saw a man sitting on a mat who commented that [REDACTED] *you have*  
5 *brought these beautiful girls*". He was with others who I had seen before, namely Otti  
6 Vincent, Mzee Banya, Abonga Papa and Onen Kamdule. We were told to sit in front of  
7 these guys, and other girls joined us. Otti told us that *"the [REDACTED] they were talking about*  
8 *is here"*, and complimented my beauty. We were told not to care about the stupid man since  
9 they would take over. I noticed a lot of people would come and salute this man.

10 9. There was a lady called Pink who I overheard saying "Afande is walking to fast". I then  
11 asked who Afande was. My friend [REDACTED] was not among them. We reached the border, and  
12 before crossing the border, we found a stream which we were to cross – everyone regardless  
13 of swimming skills. I was being taken by the water and I almost drowned. Someone jumped  
14 into the water to save me, but I saw a tree branch rooted beside and I was pulled out of the  
15 water. They asked if someone had a raw egg for me to swallow and vomit the water. We  
16 rested for about 30 minutes, and then we resumed crossing the border. They cut some  
17 barbed wire and when we were across, they informed us that we were now in Sudan.

18 10. We were hungry and thirsty, but there was no food to eat or water to drink. We were told  
19 to go and find food, but asked to be careful since the UPDF could not distinguish who is a  
20 rebel or not. We found some grass thatched houses where they were even cultivating.  
21 Everyone went to their home. [REDACTED] asked why I did not want to go home and I  
22 was astonished. [REDACTED] took me to the place where I found the man who likes sitting on the  
23 mat; I greeted him and he asked how Uganda is and whether I wanted to return home, to  
24 which I said no. I was asked whether I was mistreated, especially because Tabuley was the  
25 one in charge. Joseph Kony encouraged me to stay there. I would later learn that 'the man  
26 that loved to sit on a mat' was Joseph Kony.

27 11. Kony called someone called [REDACTED] and told him to take me to where I would live.  
28 At that place, I saw many women, over 30 in number. The same woman named [REDACTED] asked  
29 why I had been brought there, and thought because I spoke English, I must be educated. I  
30 was told they would be going to harvest the next day.

31 12. The next day, we went to the garden, and I was quite slow in harvesting. [REDACTED] was  
32 complaining about my speed and caned me seriously. I cried loudly [REDACTED]  
33 [REDACTED]. That night, six women came [REDACTED] [REDACTED]  
34 [REDACTED]  
35 [REDACTED]  
36 [REDACTED]  
37 [REDACTED]  
38 [REDACTED]

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33 [REDACTED]. That night, six women came [REDACTED]  
34 [REDACTED]  
35 [REDACTED]  
36 [REDACTED]  
37 [REDACTED]  
38 [REDACTED]

- 1 13. The escorts took me to Kony and explained my ordeal. Kony became very furious. He  
2 asked them to take me to rest. In the morning they communicated by clapping. They started  
3 with prayers led by Abonga Papa. Joseph Kony got up and started quarrelling, and they  
4 asked the boys to get canes. [REDACTED]  
5 [REDACTED]  
6 [REDACTED]
- 7 14. One night about three to four weeks after my abduction, a lady came to tell me that Kony  
8 was inviting me to his house, and that he had asked me to come and sleep. I said I would  
9 go, but I did not go. The second time I did the same; I still did not go. The third time, a boy  
10 was sent and the ladies advised me to just go and sleep there. Kony this time came himself,  
11 but he did not find me. The next day, I was asked to take water to Kony. I was laughing  
12 and he asked me to lay down. He called [REDACTED].  
13 [REDACTED], he forgave me because I was crying so much. The following night, I was  
14 invited and that was when I had sex with Kony. I began to feel some ailments, and he  
15 decided to leave me.
- 16 15. There was a day people were gathered and laughing. Kony sounded a warning that if he  
17 comes out, it will be bad. He finally came with [REDACTED] who ordered that we be caned 50  
18 strokes. [REDACTED]  
19 [REDACTED].
- 20 16. There was an attack in 2004 where there were helicopter gunships. The UPDF had  
21 surrounded us and the people began to run, and the children had been left behind. Among  
22 Kony's children, some of them were used to me and were running after me. I had a gun, a  
23 bag and children on my back. I saw some UPDF soldiers coming towards me, and I dropped  
24 everything and found myself among the UPDF soldiers. I feared this because I was told  
25 that UPDF soldiers rape women, and I ran the opposite side. I came across one [REDACTED] and we  
26 moved together. Life became very difficult since the UPDF soldiers would only move along  
27 the source of water, meaning we could not access water.
- 28 17. Kony himself suggested that we would have to return to Uganda. Kony said that he thought  
29 that I had surrendered to the UPDF, but that I was wise not to surrender. Kony went back  
30 with us to Uganda, and we were asked to avoid water sources and places where there is  
31 food because that was where the UPDF were usually located. We were so thirsty that we  
32 even began drinking one another's urine.
- 33 18. I was asked whether I know Dominic Ongwen. I recall Kony saying over the radio that they  
34 would be going to meet. I also remember a day when I saw someone who came and saluted  
35 Kony, and then Kony said he loves Dominic so much. I would hear Kony and Otti talking  
36 about Odomi, and speaking so much about him. Many other people would speak very well  
37 about Odomi. According to what I heard, he was a tough fighter who was always on the  
38 move. I remember seeing Dominic one time when he was around for two days. I knew it



1 was him because I kept hearing about him; he was not well kempt, not fat and not too dark.  
2 Dominic walked as if one of his legs was shorter than the other. Kony asked Dominic at  
3 the border about how Uganda was and that Kony heard Dominic had been tortured.

4 19. After my abduction, I received basic military training on gun use and how to shield myself  
5 from the helicopter gunships. During the training, we were once forced to kill an old man,  
6 but I did not participate in the killing. They also administered some anointing oil all over  
7 our bodies as a sign of welcome into the bush, and also as a protection against evil. I thought  
8 these rituals were performed to scare us from attempting to escape and return home.

9 20. I believed Kony had spiritual powers because during the last attack, we were surrounded  
10 by the UPDF, he would have been captured if not for his spiritual powers. We were hiding  
11 near each other and I saw the government soldiers. I got up raised my gun, and heard  
12 somebody say in Kiswahili that she is a good lady, and should be rescued. I ran towards  
13 them crying. Luckily enough, I had run into some one called [REDACTED] who actually knew me  
14 as a relative. All the bodyguards of Kony had been killed, but Kony disappeared  
15 mysteriously into thin air.

16 21. It was late when I was rescued, so we stayed the night in that area. We were given tea and  
17 food. The next morning, we came on foot up to a school where we stayed. Later, some  
18 soldiers came with a truck, and a helicopter also arrived. Because of the trauma we ran  
19 away again, but we were convinced by a UPDF soldier that all was well and the government  
20 soldiers gave us food. One of the high-ranking government soldiers came and took us to  
21 Gulu. We were then taken to Radio Mega. I was even allowed to speak to my father. I recall  
22 telling him that Kony can never be captured alive.

23 22. There was a day in Uganda when we were moving for a long time, and then we decided to  
24 rest. During this resting period, Kony said that there were some "stupid people" waiting for  
25 them ahead, but Kony instructed us to use another route. Kony would dodge an ambush  
26 easily, and would inform the soldiers later and forewarn the women to make sure the  
27 children did not cry out loud.

28 23. I was asked about my motivation to testify for Dominic Ongwen. While he was a member  
29 of LRA, he was abducted young and grew up with bad spirits, and he was influenced to do  
30 bad things by these spirits. I draw the analogy of a family eating beans throughout the year.  
31 When such a family gets a visitor, he/she eats the same and cannot demand for any better.

1 Signature: [REDACTED]

2 Name: [REDACTED]

3 Date: 29 April 2018

4 Location: Lira, Uganda

[REDACTED]

*Witness Statement*

*Initials* [REDACTED]

[REDACTED]

*Page 8 of 8*