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**International
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Date: **22 February 2018**

TRIAL CHAMBER IX

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

SITUATION IN UGANDA

**IN THE CASE OF
*THE PROSECUTOR v. DOMINIC ONGWEN***

PUBLIC

Public Redacted Version of “Defence Response to the LRV and CLRV Requests to Present Evidence and the Views and Concerns of Registered Victims”, filed on 15 February 2018

Source: Defence for Dominic Ongwen

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

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I. INTRODUCTION

1. Pursuant to paragraph 4 of the “Preliminary Directions for any LRV or Defence Evidence Presentation” and Regulation 24(1) of the Regulation of the Court, the Defence for Dominic Ongwen (‘Defence’) hereby responds to the Common Legal Representative for Victims (‘CLRv’) and Legal Representatives for Victims (‘LRV’) (jointly as ‘Legal Representatives’) requests to present evidence after the close of the Prosecution’s case-in-chief and the LRV’s request to present the views and concerns of the registered victims before any Article 74 Judgment.¹
2. For the reasons outlined below, the Defence respectfully request Trial Chamber IX (‘Chamber’) to:
 - a) Deny the Legal Representatives from presenting evidence as it apparently intends to present no evidence as shown by the failures to submit lists of evidence;
 - b) Deny the LRV’s request to present the views and concerns of the registered victims before any Article 74 Judgment;
 - c) Deny the requests of the Legal Representatives to present fact witness testimony during the case as the topics which the proposed witnesses intend to cover are repetitive, not outlined in the charges or completely incredulous; and
 - d) Deny [REDACTED] as a witness for the CLRv as his testimony would [REDACTED].

II. CONFIDENTIALITY

3. Pursuant to Regulation 23 *bis*(2) of the Regulations of the Court, the Defence submits this response as confidential. A public redacted version shall be filed proximate to the filing of this response.

¹ See ICC-02/04-01/15-1165-Conf (with accompanying confidential annexes) and ICC-02/04-01/15-1166 (with confidential annex).

III. BACKGROUND

4. On 13 October 2017, Trial Chamber IX ('Chamber') issued its "Preliminary Directions for any LRV or Defence Evidence Presentation" ('Preliminary Directions').² The Chamber ordered the Legal Representatives to submit provisional lists of witnesses by 14 December 2017 and final lists of witnesses and evidence by 2 February 2018.³
5. On 13 December 2017, the CLRV filed a submission stating that it was not ready to submit its list and that it was encountering difficulties in tracking potential witnesses.⁴ The Defence responded to this submission and requested the disclosure of all the names of the CLRV's potential witnesses.⁵ The CLRV responded on 19 December 2017,⁶ and the Chamber ordered the disclosure of the CLRV's potential expert witnesses.⁷ The CLRV emailed her provisional list of experts on 22 December 2017, and submitted it formally on 29 December 2017.⁸
6. On 14 December 2017, the LRV submitted its provisional list of witnesses. The Defence responded to this submission and requested the disclosure of all the names of the LRV's potential witnesses.⁹ The LRV responded on 18 December 2018,¹⁰ and the Chamber denied the Defence's request on 22 December 2017.¹¹
7. On 2 February 2018, the CLRV and LRV submitted requests to present witnesses,¹² and the LRV requested leave to present the views and concerns of registered victims before any Article 74 Judgment.¹³ The Legal Representatives did not submit lists of evidence.

² ICC-02/04-01/15-1021.

³ Preliminary Directions, paras 3-4.

⁴ *See generally* ICC-02/04-01/15-1105-Conf.

⁵ ICC-02/04-01/15-1109.

⁶ ICC-02/04-01/15-1113-Conf.

⁷ ICC-02/04-01/15-1117.

⁸ ICC-02/04-01/15-1125 with confidential Annex.

⁹ ICC-02/04-01/15-1109.

¹⁰ ICC-02/04-01/15-1112-Conf.

¹¹ ICC-02/04-01/15-1117.

¹² *See* ICC-02/04-01/15-1165-Conf (with accompanying confidential annexes) and ICC-02/04-01/15-1166 (with confidential annex).

¹³ ICC-02/04-01/15-1166, paras 37-58.

IV. SUBMISSIONS

- a) *The Chamber should deny the Legal Representatives from presenting evidence as neither submitted a list of evidence or Acholi translations of statements and reports have not been produced for Mr Ongwen*
8. The Chamber ordered the Legal Representatives to submit final lists of witnesses and evidence by 2 February 2018.¹⁴ At the least, the Defence expected lists containing the **relevant** published works of proposed experts to be discussed in their testimonies, disclosure of said published works and any reports produced for trial. It is noted that the Legal Representatives wrote that expert reports shall come,¹⁵ but this is far past the deadline for the respective lists of evidence. The Defence also notes that victim participation application numbers were disclosed by the LRV in its confidential annex, but the Defence is yet to receive unredacted victim participation applications from these proposed witnesses and their family members.
9. Article 67(1)(b) of the Rome Statute guarantees Mr Ongwen the right to adequate **time** and facilities to prepare his defence. Article 67(1)(c) of the Rome Statute guarantees Mr Ongwen the right to be tried without undue delay. Article 67(1)(e) of the Rome Statute guarantees Mr Ongwen the right to examine witnesses called against him. Article 67(1)(f) of the Rome Statute guarantees Mr Ongwen “[t]o have, free of any cost...translations as are necessary to meet the requirement of fairness, if any of the proceedings of or documents presented to the Court are not in a language which the accused fully understands and speaks.”
10. Mr Ongwen has not been provided with Acholi translations of alleged expert reports¹⁶ and witness statements of the proposed witnesses by the Legal Representatives. This violates Mr Ongwen’s rights under Articles 67(1)(b), (e) and (f) of the Rome Statute. In relation to the registered victims being called by the LRV, the Defence demands Acholi translations of any statement(s) provided to the LRV or its staff so Mr Ongwen may exercise his rights pursuant to Articles 67(1)(b), (c) and (e) of the Rome Statute. If statements were not generated from the meetings with the proposed witnesses, Acholi translations of 1) the summaries of expected testimonies **and** 2) the respective victim participation applications should have been supplied to Mr Ongwen. This is the

¹⁴ Preliminary Directions, para. 4.

¹⁵ See ICC-02/04-01/15-1165-Conf, paras 21 and 27 and ICC-02/04-01/15-1166-Conf-Anx, para. 33.

¹⁶ See *Ibid.*

bare minimum which Article 67(1)(f) of the Rome Statute guarantees Mr Ongwen. And without such translations, Mr Ongwen's rights pursuant to Articles 67(1)(b), (c) and (e) of the Rome Statute will in turn be violated.

11. The Chamber ordered the Prosecution to disclose Acholi translations of witness statements and transcripts of interviews to the Defence no fewer than three months before the expected testimony of the witness.¹⁷ The Defence expects no less from the Legal Representatives. If such material is distinctly different from that which the Prosecution presented, which the Defence argues against below, Mr Ongwen has the unalienable right to that information in a language he fully understands and speaks.
12. The CLRV stated that it expects the expert reports to be completed "in the course of the month of March 2018".¹⁸ The LRV gives no similar type of assurances. As such, if the reports of the proposed experts are completed by the end of March 2018, those report still need to be translated into Acholi. Trial will be delayed and Mr Ongwen's right pursuant to Article 67(1)(c) will be violated.
13. Furthermore, *in arguendo*, if the reports are accompanied with Acholi translations, the expected completion of the reports coincide with the expected completion of the Prosecution's case-in-chief. It is worth stating that during that time period, those three weeks after the close of the Prosecution's case-in-chief, the Defence shall be finalising its own list of witnesses and evidence as ordered by the Chamber in the Preliminary Directions.¹⁹ It is inconceivable that one postulates that preparation time of one month, especially with lack of translations for Mr Ongwen and that the Defence shall be finalising its own lists of witnesses and evidence, is "ample opportunity to be acquainted with the experts [sic] reports which will be disclosed to it in due course..."²⁰ The CLRV, even knowing the expected testimonies of its proposed experts, still requests a minimum of one month to prepare their testimonies.²¹ The lateness of the reports will cause further undue delay of the trial, violating Mr Ongwen's right pursuant to Article 67(1)(c) of the Rome Statute.

¹⁷ ICC-02/04-01/15-457, para. 10.

¹⁸ ICC-02/04-01/15-1165-Conf, para. 37.

¹⁹ Preliminary Directions, para. 7.

²⁰ ICC-02/04-01/15-1165-Conf, para. 36.

²¹ *Ibid.*, para. 37.

14. For the abovementioned reasons, the Defence respectfully requests the Chamber to deny the Legal Representatives from calling witnesses as it would violate Mr Ongwen's rights pursuant to Article 67(1)(b), (c), (e) and (f) of the Rome Statute.

b) The Chamber should deny the LRV request to present the views and concerns of registered victims before any Article 74 Judgment

15. The LRV wishes to present the views and concerns of the registered victims before any Article 74 Judgment without proffering a single cogent reason for the desire to present the views and concerns before any possible Article 74 Judgment. The Defence does not argue at this stage whether the views and concerns of the registered victims should be presented in person, but reserves its right to argue it when appropriate. The Defence only argues that the timing requested by the LRV is inappropriate at this time.
16. The views and concerns, *i.e.* unsworn statements, of the registered victims is best placed after an Article 74 Judgment, if any guilty verdicts are returned. As Judge Pikis wrote:

Participation is confined to the expression of the victims' "views and concerns". It is a highly qualified participation limited to the voicing of their views and concerns. Victims are not made parties to the proceedings nor can they proffer or advance anything other than their "views and concerns". The term "views" in the context of article 68 (3) of the Statute signifies "opinion", in fact an opinion, stance or position on a subject. In the Russian and Spanish version of article 68 (3) of the Statute the word "opinion" is used. "[C]oncerns" signify matters of interest to a person; matters that preoccupy him/her. "[P]réoccupations" is precisely the word used in the French text of the Statute. A combination of the two, "views", "concerns" joined by the conjunctive "and" signifies that victims can express themselves about both, their preoccupations and their opinion.²²

17. This issue is not whether the Rome Statute allows the views and concerns of the registered victims, but the timing and manner in which it is done.
18. As the LRV noted, the Chamber stated in the Preliminary Directions that it "is not provisionally inclined to hear victims present unsworn, non-evidentiary 'views and concern' before its Judgment."²³ The Defence agrees with the Chamber's assessment in the Preliminary Directions.

²² ICC-01/04-01/06-925, *separate opinion of Judge Georgios M. Pikis*, para. 15 [internal citations omitted].

²³ Preliminary Directions, para. 2(ii) [internal citations omitted].

19. The inclusion of the views and concerns of the victims, or as Judge Pikis stated, the victims' preoccupations and opinions, has no place during the presentation of evidence, which is exactly what the victim impact statements discussed by the LRV take place after a judgment.²⁴ The Chamber noted that it permitted the Legal Representatives to question witnesses during the Prosecution's case-in-chief, which included many dual status witnesses.²⁵ The Chamber also allowed the Legal Representatives to elicit testimony of the views and concerns of the witnesses during their questioning.²⁶ The participation of the registered victims has been meaningful during the Prosecution's case-in-chief. Recently, the Defence even notified the Chamber that its questioning of Witness P-0410 would take less time than anticipated, which allowed the LRV to question the witness.
20. The presentation of evidence is just that, a presentation of the evidence to the decider of fact, *i.e.* the Chamber. The views and concerns of the victims are not evidence. Until such time that an Article 74 Judgment is rendered, there is no place for unsworn statements other than that of an accused. If the Judgment is not guilty, no such views and concerns are necessary, and time would have been spent for naught.
21. Should there be any guilty verdicts in the Article 74 Judgment, that is the time for the Legal Representatives to argue for the views and concerns of the registered victims. Until such time, if ever, such views and concern of the registered victims should be limited as outlined in the Preliminary Directions. As such, the Defence requests the Chamber to deny the LRV's request to present the views and concerns of the registered victims until after the Article 74 Judgment.
- c) *The Chamber should deny the requests of the Legal Representatives to present fact and expert witness testimony during the case as the topics which the proposed witnesses intend to cover are repetitive, not outlined in the charges or completely incredulous*
22. In the Preliminary Directions, the Chamber stated that "[a]dditional evidence above and beyond what has already been elicited in the course of the Prosecution's evidence presentation will be permitted only when it is clearly justified."²⁷ The Defence weens

²⁴ ICC-02/04-01/15-1166, para. 44.

²⁵ Preliminary Directions, para. 2(i).

²⁶ *Ibid.*

²⁷ *Ibid.*

that the Legal Representatives fail this standard with its proposed witnesses. The potential witness evidence is either repetitive, not outlined in the charges or completely incredulous.

23. Article 66(2) of the Rome Statute places the onus of proving guilt solely on the Prosecution. Whilst Article 68(3) of the Rome Statute has been interpreted to allow for meaning participation of registered victims, it does not grant the Legal Representatives an unfettered right to present evidence against Mr Ongwen.
24. Additionally, the Defence draws the Chamber's attention to Trial Chamber's III decision on victim participation, which was noted by the Legal Representatives:²⁸

In the view of the Majority, these conditions entail a number of criteria that will assist in determining which victims are best placed to present evidence by personally appearing before the Court. Trial Chamber II identified these criteria as follows:'

a. Whether the proposed testimony relates to matters that were already addressed by the Prosecution in the presentation of its case or would be unnecessarily repetitive of evidence already tendered by the parties.

b. Whether the topic(s) on which the victim proposes to testify is sufficiently closely related to issues which the Chamber must consider in its assessment of the charges brought against the accused.

c. Whether the proposed testimony is typical of a larger group of participating victims, who have had similar experiences as the victim who wishes to testify, or whether the victim is uniquely apt to give evidence about a particular matter.

d. Whether the testimony will likely bring to light substantial new information that is relevant to issues which the Chamber must consider in its assessment of the charges.²⁹

25. The Defence shall discuss below relevant considerations for the Chamber's decision.

The Proposed Witnesses of the Legal Representatives Would be Repetitive of the Prosecution's Presentation of Evidence

26. Much of the expected testimonies of the victim-fact witnesses proposed by the LRV are repetitive of the victim-fact witnesses presented by the Prosecution. As the Legal Representatives are not secondary prosecutors, the obligation is upon the Legal

²⁸ See ICC-02/04-01/15-1165-Conf, para. 13 (noting the *Katanga Decision*, which was cited by Trial Chamber III) and ICC-02/04-01/15-1166, fn. 12.

²⁹ ICC-01/05-01/08-2138, para. 24.

Representatives to show the standards outline by the Appeals Chamber, and those expounded upon by other chambers of the Court.

27. Since witness identification codes were not given by the Legal Representatives, the Defence shall use other means to identify the proposed witnesses. The LRV wishes to call participating victim “[REDACTED]”.³⁰ This proposed witness’s principle purpose for testifying is to discuss the impact on education felt by those the witness knows and his area.³¹ The Defence notes that this question, what impact did your abduction or the attack have on your life, has been a recurrent theme in the examination of Prosecution witnesses by the Legal Representatives. With respect, the Chamber has heard this evidence many times, and is mainly related to the views and concerns of the registered victims, not evidence which is material for an Article 74 Judgment.
28. The LRV wishes to call participating victim “[REACTED]”.³² This proposed witness’s principle purpose for testifying is to discuss the “the various and interrelated forms of harm experienced in the Lukodi community as a result of the crimes charged.”³³ Again, this in an area which was covered during the Prosecution’s case-in-chief, and further topics to be discussed are primarily related to the views and concerns of the registered victims.
29. The LRV wishes to call participating victim “[REDACTED]”.³⁴ This proposed witness’s principle purpose for testifying is to discuss the stigma of being abducted into the LRA.³⁵ Again, this is an area which the Chamber heard on several occasions during the Prosecution’s presentation of evidence. His other areas of testimony, as outlined in the LRV’s confidential annex, are equally repetitive.³⁶ Finally, this principle topic relates to the views and concerns of the registered victims, not to the alleged charges.
30. The LRV wishes to call proposed experts [REDACTED] and [REDACTED].³⁷ The principle purposes of their testimonies are “to complement material already presented

³⁰ ICC-02/04-01/15-1166-Conf-Anx, pp 2-3.

³¹ *Ibid.*, para. 2.

³² *Ibid.*, pp 3-4.

³³ *Ibid.*, para. 8.

³⁴ *Ibid.*, p. 7.

³⁵ *Ibid.*, para. 25.

³⁶ *Ibid.*, para. 26.

³⁷ *Ibid.*, pp 8-10.

by the OTP, and to add a “big picture perspective, showing the overview of different kinds of harms suffered, their inter-relationship, and the best approaches to addressing them through reparations.”³⁸ In essence, and as written by the LRV, these witnesses shall discuss areas covered by the Prosecution and areas of victimisation, *i.e.* the views and concerns of the registered victims.³⁹ Once again, these proposed expert witnesses shall discuss areas covered, and is repetitive, and views and concerns of the registered victims, which is best placed after an Article 74 Judgment.

31. The CLRV wishes to call proposed expert witnesses [REDACTED] and [REDACTED].⁴⁰ The principle purposes of their testimonies are discussed in paragraphs 17-20 of the CLRV’s request. The Defence perceives their proposed testimonies as repetitive, and the CLRV noted that “[s]everal witnesses – including dual status individuals represented by the Common Legal Representative – testified about their abduction and the consequences of said abductions upon their lives and the lives of their families.”⁴¹ Furthermore, gleaned from the description of the rest of the proposed testimonies, a significant amount of it shall be about views and concerns of the victims, which the Defence repeats, it is not the proper timing at this juncture to discuss the views and concerns of the registered victims.
32. The CLRV wishes to call proposed expert witness [REDACTED].⁴² The principle purpose of his testimony is to discuss the impact of alleged SGBC. Again, the CLRV notes that these topics were discussed by witnesses called by the Prosecution,⁴³ and in the Defence’s point-of-view, is repetitive. The further topics for discussion by the proposed expert witness mainly encompass the views and concerns of the witnesses, and it is not the appropriate juncture for this type of testimony.
33. The CLRV wishes to call proposed expert witness [REDACTED].⁴⁴ For reasons set out in section IV(d) below, the Defence requests that the Chamber deny his involvement in the case.

³⁸ *Ibid.*, para. 31.

³⁹ *See ibid.*, para. 32.

⁴⁰ ICC-02/04-01/15-1165-Conf, paras 17-20.

⁴¹ *Ibid.*, para. 18.

⁴² *Ibid.*, paras 21-23.

⁴³ *Ibid.*, para. 22.

⁴⁴ *Ibid.*, paras 24-27.

34. The CLRV wishes to call proposed expert witness [REDACTED].⁴⁵ The principle purpose of her testimony is to discuss Acholi culture. Regardless of the fact that the Defence feels that the best persons to discuss Acholi culture are the Acholi cultural leaders, the proposed witness's testimony is once again repetitive of questions asked and answered of witnesses of Acholi ethnicity⁴⁶ and Prosecution Witness P-0422. The Chamber has already heard evidence from a Prosecution expert on this topic, and the Legal Representatives were allowed to examine the witness.⁴⁷ Whilst the proposed witness may study Acholi culture and customs, the witnesses called by the Prosecution, and to be called by the Defence, live and practice Acholi culture and customs. The further topics to be discussed by this witness are mainly issues related to the views and concerns of the registered victims, and should not be heard at this time.

The Chamber Should Deny the LRV Request to Present Witnesses Who's Proposed Testimonies are not Outlined in the Charges or Completely Incredulous

35. The LRV wishes to call participating victim "[REDACTED]".⁴⁸ The witness's principle purpose of testifying is "concerning sexual violence against men and boys".⁴⁹ The Defence notes that these acts are not outlined in the "Decision on the confirmation of the charges against Dominic Ongwen."⁵⁰ As noted by the Trial Chamber III, which cited Trial Chamber II, at the least, these accusations would be ones which are vastly distinct from the experiences testified to by former LRA and alleged victims.⁵¹ As for his other areas of testimony, these areas have been covered by Prosecution witnesses and are repetitive.
36. The LRV wishes to call participating victim "[REDACTED]".⁵² The witness's principle purposes of testifying are to discuss areas "concerning sexual violence against men and boys and...[REDACTED]".⁵³ The Defence incorporates its statement in paragraph 35 directly above. The reasons for denying this proposed witness are the same as for proposed witness "[REDACTED]".

⁴⁵ *Ibid.*, paras 28-30.

⁴⁶ *See Ibid.*, para 29.

⁴⁷ ICC-02/04-01/15-T-28-ENG ET, pp 88-104.

⁴⁸ ICC-02/04/01/15-1166-Conf-Anx, p. 4.

⁴⁹ *Ibid.*, para. 12.

⁵⁰ ICC-02/04-01/15-422-Conf, paras 136-140.

⁵¹ *See* para. 24 above.

⁵² ICC-02/04/01/15-1166-Conf-Anx, pp 5-6.

⁵³ *Ibid.*, para. 16.

37. The LRV wishes to call participating victim “[REDACTED]”.⁵⁴ The witness’s principle purpose of testifying is “concerning sexual violence against men and boys”.⁵⁵ The Defence incorporates its statement in paragraph 35 above. The reasons for denying this proposed witness are the same as for proposed witness “[REDACTED]” and “[REDACTED]”.
38. Further to this topic, the Defence notes with discontent that the LRV has had ample opportunity to question Prosecution witnesses related to the alleged topics of sexual violence against boys, *i.e.* homo-sexualisation,⁵⁶ [REDACTED].⁵⁷ No such questions about this type of allegation have been asked by the LRV. As testified to by Prosecution witnesses during Defence cross examination, homosexual acts were not ordered, condoned or tolerated in the LRA and were punished by execution.⁵⁸
39. For the abovementioned reasons, the Defence requests the Chamber to deny the LRV from calling the proposed witnesses discussed in paragraphs 35-38 above as their expected testimonies are both highly incredulous and outside the scope of the confirmed charges.
- d) The Chamber should deny [REDACTED] as a witness for the CLRV as his participation for the CLRV [REDACTED]*
40. The CLRV wishes to call [REDACTED] to testify about the effects of the violence on the Acholi people.⁵⁹ The Defence assumes that the proposed expert witness shall discuss generally topics, and shall not discuss specific issues and incidents he learned during the course of his official work [REDACTED]. As such, the Defence reserves its right to object to questions proposed by the Parties or Participants should such questions be asked, if he is allowed to testify.
41. [REDACTED].⁶⁰

⁵⁴ *Ibid.*, p. 6.

⁵⁵ *Ibid.*, para. 21.

⁵⁶ ICC-02/04-01/15-1166, para. 17.

⁵⁷ ICC-02/04-01/15-1166-Conf-Anx, paras 15-16.

⁵⁸ *For example, see* ICC-02/04-01/15-T-72-CONF-ENG ET, p. 50, lns 3-9.

⁵⁹ ICC-02/04-01/15-1165-Conf, para. 26.

⁶⁰ *See generally* ICC-02/04-01/15-339-Anx. Even though not explicitly stated, the reads into this protocol an obligation to determine whether an interviewee has been approached by a Party or Participant, or is a witness as defined by the protocol. Without imputing such a requirement, one can easily disregard this protocol by refusing to ask such questions, and the protocol becomes nearly worthless.

42. [REDACTED].

43. [REDACTED].

44. [REDACTED].

45. [REDACTED]. As such, the Defence respectfully requests the Chamber to deny the CLRV's request to call [REDACTED] to testify before the Court.

V. CONCLUSION

46. The Defence respectfully requests the Chamber to deny the Legal Representatives the opportunity to call witnesses to testify for the reasons discussed above.

47. The Defence also respectfully requests the Chamber to deny the LRV's request to present the views and concerns of the registered victims before an Article 74 Judgment.

Respectfully submitted,



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Hon. Krispus Ayena Odongo
On behalf of Dominic Ongwen

Dated this 22nd day of February, 2018

At Gulu, Uganda