

Annex A

Public



PROPOSAL FOR AGREEMENT ON FACTS PURSUANT TO RULE 69

The Prosecutor v. Dominic ONGWEN

No. ICC-01/04-01/15

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A. FACTS ALLEGED BY THE PROSECUTION RELATING TO THE CONTEXTUAL ELEMENTS OF THE CRIMES

A.	PROPOSED FACT	AGREEMENT BY DOMINIC ONGWEN / PROPOSAL BY DEFENCE
	Pertaining to geography	
A1.	Pajule is located in Pajule Sub-County, Aruu County, Pader District, Uganda	Agreed to the location of the Town of Pajule, but not knowledge of the specific location of the Town.
A2.	Lukodi is located in Bungatira Sub-County, Aswa County, Gulu District, Uganda.	Agreed to the location of the Town of Lukodi, but not knowledge of the specific location of the Town.
A3.	Odek is located Odek Sub-County, Omoro County, Gulu District, Uganda.	Agreed to the location of the Town of Odek, but not knowledge of the specific location of the Town.
A4.	In June 2004, Abok was located in Ngai Sub-County, Apac District, Uganda. Abok is now located in Abok sub-county, Oyam District, Uganda.	Agreed to the location of the Town of Abok, but not knowledge of the specific location of the Town.
	Pertaining to the people in northern Uganda	
A5.	The largest ethnic groups in northern Uganda at the time of the charges were the Acholi and the Langi, with the Iteso one of the largest in Eastern Uganda.	Agreed
	Pertaining to the armed conflict	
A6.	LRA is an acronym for the <i>“Lord’s Resistance Army”</i> .	Agreed

A.	PROPOSED FACT	AGREEMENT BY DOMINIC ONGWEN / PROPOSAL BY DEFENCE
A7.	The LRA was one of the groups in Uganda referred to as " <i>The Holy</i> ".	Agreed
A8.	Between 1 July 2002 and 31 December 2005, Joseph KONY was in charge of the LRA and was also its spiritual leader.	Agreed
A9.	UPDF is an acronym for the " <i>Ugandan People's Defence Forces</i> ", the official military of the Ugandan government.	Agreed
A10.	LDU is an acronym for the " <i>Local Defence Unit</i> ".	Agreed
A11.	LDU were established by, and affiliated with, the Ugandan Government.	Agreed
A12.	ISO is an acronym for the " <i>Internal Security Organisation</i> "	Agreed
A13.	The " <i>Amuka</i> " and " <i>Arrow Boys</i> " were local militia armed by the Ugandan government.	Agreed
A14.	NRM is an acronym for the " <i>National Resistance Movement</i> " political party.	Agreed
A15.	NRA is an acronym for the " <i>National Resistance Army</i> ".	Agreed
A16.	Between 1 July 2002 and 31 December 2005, Yoweri Museveni was the President of the Republic of Uganda and the Chairman of the NRM party.	Agreed

B. FACTS ALLEGED BY THE PROSECUTION RELATING TO DOMINIC ONGWEN'S BACKGROUND

B.	PROPOSED FACT	AGREEMENT BY DOMINIC ONGWEN/ PROPOSAL BY DEFENCE
B1.	Dominic ONGWEN was born in Uganda.	Agreed
B2.	Dominic ONGWEN belongs to the Acholi ethnic group.	Agreed
B3.	Dominic ONGWEN is also known as " <i>Odomi</i> ".	Agreed

C. FACTS ALLEGED BY THE PROSECUTION RELATING TO THE CHARGES

C.	PROPOSED FACT	AGREEMENT BY DOMINIC ONGWEN/ PROPOSAL BY DEFENCE
	Pertaining to the attack on Pajule IDP camp	
C1.	On or about 10 October 2003, there was an attack on Pajule IDP camp.	Agreed
	Pertaining to SGBC	
C2.	Dominic ONGWEN and P-0101 are the biological parents of [REDACTED].	Agreed
C3.	Dominic ONGWEN and P-0101 are the biological parents of [REDACTED].	Agreed
C4.	Dominic ONGWEN and P-0214 are the biological parents of [REDACTED].	Agreed