



Original: English

No: ICC-01/05-01/13

Date: 20 July 2016

TRIAL CHAMBER VII

Before: Judge Chile Eboe-Osuji, Presiding Judge
Judge Olga Herrera Carbuccion
Judge Bertram Schmitt

SITUATION IN THE CENTRAL AFRICAN REPUBLIC

IN THE CASE OF

***THE PROSECUTOR v. JEAN-PIERRE BEMBA GOMBO, AIMÉ KILOLO
MUSAMBA, JEAN-JACQUES MANGENDA KABONGO, FIDÈLE BABALA WANDU
AND NARCISSE ARIDO***

Public Redacted Version

**Mangenda Observations on the proposed Memorandum of Understanding
between the ICC and MINUSCA**

Source: Defence for Jean-Jacques Kabongo Mangenda

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

The Office of the Prosecutor

Ms Fatou Bensouda

Mr James Stewart

Mr Kweku Vanderpuye

Counsel for Jean-Jacques Mangenda

Kabongo

Mr Christopher Gosnell

Counsel for Jean-Pierre Bemba Gombo

Ms Melinda Taylor

Counsel for Aimé Kilolo Musamba

Mr Paul Djunga Mudimbi

Counsel for Fidèle Babala Wandu

Mr Jean-Pierre Kilenda Kakengi Basila

Counsel for Narcisse Arido

Mr Charles Achaleke Taku

Legal Representatives of the Victims

Legal Representatives of the Applicants

Unrepresented Victims

**Unrepresented Applicants
(Participation/Reparation)**

**The Office of Public Counsel for
Victims**

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

States' Representatives

Amicus Curiae

REGISTRY

Registrar

Mr Herman von Hebel

Defence Support Section

Victims and Witnesses Unit

Detention Section

**Victims Participation and Reparations
Section**

Other

1. Jean-Jacques Kabongo Mangenda adopts and supports the submissions of Jean-Pierre Bemba Gombo¹ concerning the [REDACTED].²
2. Mr Mangenda is particularly concerned by the [REDACTED] that [REDACTED]. [REDACTED]. The suggestion that Defence Counsel are more likely to engage in misconduct than ICC staff is baseless, and justifies no differential treatment [REDACTED].
3. The unequal treatment of the Defence could concretely and substantially affect the Defence's ability to conduct investigations and, consequently, the fairness of these proceedings. Mr Mangenda accordingly requests that the Trial Chamber issue any orders, requests or instructions as it may deem necessary and appropriate to ensure that the Defence is not provided any less assistance [REDACTED] than that afforded to the Prosecution in this case.



Christopher Gosnell
Counsel for Mr. Jean-Jacques Kabongo Mangenda

Dated this 20 July 2016,

At The Hague, The Netherlands

¹ Observations of the Defence for Mr. Jean-Pierre Bemba Gombo on the Agenda of the First Status Conference, ICC-01/05-01/13-896-Conf, 13 April 2015, paras. 19-25, 26-28.

² This submission is a public redacted version prepared pursuant to the Chamber's direction in its Decision Closing the Submission of Evidence and Further Directions, ICC-01/05-01/13-1859, 29 April 2016.