

**Cour
Pénale
Internationale**



**International
Criminal
Court**

Original: **English**

No.: **ICC-01/04-02/06**

Date: **26 March 2018**

TRIAL CHAMBER VI

Before:

**Judge Robert Fremr, Presiding Judge
Judge Kuniko Ozaki
Judge Chang-ho Chung**

SITUATION IN THE DEMOCRATIC REPUBLIC OF THE CONGO

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

Confidential

Response to “Confidential redacted version of ‘Prosecution’s submissions in relation to ‘Decision on Defence requests for lifting of redactions and disclosure’, ICC-01/04-02/06-2252-Conf’, 14 March 2018, ICC-01/04-02/06-2257-Conf”

Source: Defence Team of Mr Bosco Ntaganda

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
Ms Nicole Samson

Counsel for the Defence

Me Stéphane Bourgon
Me Christopher Gosnell

Legal Representatives of Victims

Ms Sarah Pellet
Mr Dmytro Suprun

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

Amicus Curiae

REGISTRY

Registrar

Mr Herman von Hebel

Counsel Support Section

Victims and Witnesses Unit

Mr Nigel Verrill

Detention Section

**Victims Participation and Reparations
Section**

Other

Response to Response to “Confidential redacted version of ‘Prosecution’s submissions in relation to ‘Decision on Defence requests for lifting of redactions and disclosure’, ICC-01/04-02/06-2252-Conf’, 14 March 2018, ICC-01/04-02/06-2257-Conf”¹

INTRODUCTION

1. On 9 March 2018, following *ex parte* submissions by the Prosecution to the Trial Chamber concerning the content of information obtained from a potential rebuttal witness, the Trial Chamber observed that “it would have been more appropriate if the Prosecution had refrained from providing the Chamber” with “the substance of the Individual’s anticipated evidence.”² The Trial Chamber ordered the Prosecution to disclose portions of the two *ex parte* filings in question, and also found that the information obtained from the potential rebuttal witness was “disclosable to the Defence.”³
2. The Prosecution has now apparently provided to the Trial Chamber, on an *ex parte* basis, the entirety of the substance of the potential rebuttal witness’s anticipated evidence. The Prosecution claims that this information is “incriminatory.”⁴ The Prosecution also claims that it provided this incriminatory information *ex parte* “[i]n accordance” with the Trial Chamber’s Decision.⁵ The Trial Chamber did express its willingness to entertain, if necessary, further submissions from the Prosecution: (i) in respect of the *ex parte* filings, on “why the lifting of the relevant redactions would lead to identification of the Individual”;⁶ and (ii) in respect of the disclosable materials, to provide “the relevant information” in case of “uncertainties concerning the extent of [the Prosecution’s] disclosure obligations,” or

¹ Confidential redacted version of “Prosecution’s submissions in relation to ‘Decision on Defence requests for lifting of redactions and disclosure’, ICC-01/04-02/06-2252-Conf”, 14 March 2018, ICC-01/04-02/06-2257-Conf”, 15 March 2018, ICC-01/04-02/06-2257-Conf-Red (“Prosecution Request”).

² Decision on Defence requests for lifting of redactions and disclosure, 9 March 2018, ICC-01/04-02/06-2252 (“Decision”), para. 18.

³ Decision, para. 24.

⁴ Prosecution Request, para. 9.

⁵ Prosecution Request, para. 13.

⁶ Decision, paras. 22, 25.

“serious and justified concerns that certain information cannot be disclosed without revealing the Individual’s identity”.⁷

3. The submission of the totality of the witness’s “incriminatory” evidence to the Trial Chamber on an *ex parte* basis deepens the prejudice and the appearance of bias created by such submissions. The Defence, to be clear, still has no indication of the subject-matter of this information that apparently goes to the merits of the case against Mr Ntaganda, and that the Prosecution claims is “incriminatory”. Only one remedy is now adequate in the circumstances: ordering disclosure of all of the *ex parte* material, including the source’s identity.
4. Any disclosure order or order for reclassification may be accompanied by other appropriate non-disclosure orders and/or other protective measures as deemed appropriate and necessary. These alternatives must be considered in evaluating whether non-disclosure under Rule 81(4) is, to the exclusion of other alternatives, “necessary.”⁸
5. In the alternative, the Defence requests that the Trial Chamber order the fullest possible reclassification and disclosure of all *ex parte* materials consistent with the non-disclosure of the potential witness’s identity.

PROCEDURAL HISTORY

6. The procedural background of the current matter has been previously set out by the Trial Chamber in its Decision.⁹
7. Subsequent to the Decision, the Prosecution filed another *ex parte* submission on 15 March 2018, with redactions concealing all of the Prosecution’s

⁷ Decision, para. 24 [underline added].

⁸ *Lubanga*, Judgment on the appeal of Mr. Thomas Lubanga Dyilo against the decision of the Pre-Trial Chamber I entitled “First Decision on the Prosecution Requests and Amended Requests for Redactions under Rule 81”, 14 December 2006, ICC-01/04-01/06-773, para. 33 (“[...] if less restrictive protective measures are sufficient and feasible, a Chamber must choose those measures over more restrictive measures”).

⁹ Decision, paras. 1-9.

substantive submissions to the Trial Chamber. The filing also contains two *ex parte* annexes that are described as “the information provided by the witness”.¹⁰ The Prosecution asserts that, in its view, none of the information is subject to disclosure under Rule 77 because it “is not material to the preparation of the Defence”.¹¹ The Prosecution argues in the alternative that it be relieved of its disclosure obligations pursuant to Rule 81(4) of the Rules of Procedure and Evidence.¹²

SUBMISSIONS

- (i) *The Prosecution has exceeded the scope of the Trial Chamber's invitation to make additional submissions, and has made ex parte submissions on matters pertaining to the merits of this case that are not authorised under the statutory framework of the Court*
8. The Trial Chamber has previously expressed its unease at the extent of the substantive *ex parte* submissions that the Prosecution has made in relation to this matter. In particular, the Trial Chamber observed that:

Pending the Prosecution's determination as to whether “it can request the Chamber to authorise his testimony in rebuttal,” the Chamber considers that it would have been more appropriate if the Prosecution had refrained from providing the Chamber with any such information at that stage.¹³

9. The Trial Chamber's subsequent invitation to the Prosecution to make additional submissions must be read against that guidance. The Trial Chamber appears to have intended to limit the matters on which the Prosecution should make further *ex parte* submissions. As to the previous *ex parte* filings, the Prosecution was permitted to make additional submissions “as to why the lifting of the relevant redactions would lead to the identification of the

¹⁰ Prosecution Request, para. 13.

¹¹ Prosecution Request, para. 10.

¹² All subsequent references to “Rule” or “Rules” are to be understood as referring to the ICC Rules of Procedure and Evidence.

¹³ Decision, para. 18.

Individual”.¹⁴ As to the disclosable material, the Trial Chamber held, and directed, that:

However, given the Prosecution’s indication that the information provided, or expected to be provided, relates to the testimony of the accused, and the fact that it was found to be of sufficient importance to be considered for a request to present evidence in rebuttal, the Chamber considers that the information could be *prima facie* material, and therefore, disclosable to the Defence. In these circumstances, the Chamber directs the Prosecution to review the information provided by the Individual with a view to identifying any information that is disclosable to the Defence, and, if applicable, disclose any such information without delay, in line with the regime established in the “Decision on the Protocol establishing a redaction regime”. In case of uncertainties concerning the extent of its disclosure obligations, or serious and justified concerns that certain information cannot be disclosed without revealing the Individual’s identity, the Prosecution shall provide the Chamber with the relevant information in order for the Chamber to determine whether, and under which conditions, such information is disclosable to the Defence.¹⁵

10. The Prosecution appears to have interpreted “the relevant information” as meaning the entirety of the information provided by the witness. In providing the entirety of the “information provided by the witness,” the Prosecution asserts that it is acting “[i]n accordance with the Chamber’s directions in its 9 March Decision.”¹⁶
11. The Defence submits that the Trial Chamber’s reference to “relevant information” was intended to be more limited. First, the Trial Chamber did not open the door to reconsideration of its fundamental finding that the information was “*prima facie* material” – which is the trigger for disclosure under Rule 77.¹⁷ The Prosecution has nevertheless asserted, contrary to this finding, that the information “is not material to the preparation of the

¹⁴ Decision, para. 22.

¹⁵ Decision, para. 24 [underline added].

¹⁶ Prosecution Request, para. 13.

¹⁷ Decision, para. 24.

Defence.”¹⁸ The position is untenable in light of past jurisprudence,¹⁹ and is not even seriously supported by the Prosecution,²⁰ which also characterises the information as “incriminatory”.²¹ It cannot seriously be argued that information that is simultaneously “incriminatory” but not material, especially considering that the Prosecution deemed the information so material to this case that it purportedly met the high threshold for introduction as rebuttal evidence. The Prosecution’s unsupported claim that the admissibility of the information is “one facet of Rule 77” is also incorrect.²²

12. Second, the Chamber limited the Prosecution’s additional submissions to “uncertainties” about the “extent of [the Prosecution’s] disclosure obligations”.²³ Rather than making submissions about specific “uncertainties” – such as whether particular information might fall outside of *prima facie* materiality, or might reveal the witness’s identity – the Prosecution has taken the liberty of assuming that the “uncertainties” extend to the Trial Chamber’s core finding. This approach has allowed the Prosecution to adopt a correspondingly liberal approach to the scope of the substantive information that it claims it was permitted to provide to the Trial Chamber.
13. This approach, in the Defence’s view, misreads the Decision and substantially undermines its purpose – which was to ensure that the Trial Chamber was not placed in the position of receiving substantive information about the case *ex parte*. The Prosecution’s interpretation of the Decision means that the Trial

¹⁸ Prosecution Request, para. 10.

¹⁹ *Lubanga*, Judgment on the appeal of Mr. Lubanga Dyilo against the Oral Decision of Trial Chamber I of 18 January 2008, 11 July 2008, ICC-01/04-01/06-1433, para. 78 (“[...] the term ‘material to the preparation of the defence’ must be interpreted broadly,”) referring to ICTR and ICTY jurisprudence interpreting similarly-worded statutory provisions.

²⁰ The full extent of the Prosecution’s arguments are contained in three cursory statements in paragraph 10 of the Prosecution Request.

²¹ Prosecution Request, para. 9.

²² *Bemba*, Decision on defence requests for disclosure, ICC-01/05-01/08-3100, 2 July 2014, para. 24 (“Whether the prosecution intends to submit an item as evidence in a trial is irrelevant to its obligations under Article 67(2) of the Statute and the materiality prong of Rule 77 of the Rules.”)

²³ Decision, para. 24.

Chamber has now been exposed to a much wider range of information concerning the merits of this case on an *ex parte* basis.

14. The statutory instruments of the court, furthermore, do not authorise the Prosecution to submit potential Rule 77 material to the Trial Chamber for *ex parte* review. On the contrary, the only head of potential disclosure for which *ex parte* review by a Trial Chamber is permitted are materials that are potentially exculpatory under Article 67(2).²⁴ Review of potential Rule 77 disclosure also does not fall within one of the five situations in which *ex parte* proceedings are expressly authorised in the Court's statutory instruments.²⁵ The Appeals Chamber has recently re-affirmed that the "Court's functions are regulated by a comprehensive legal framework in which its powers have been deliberately spelt out by the drafters to a great degree of detail, thus leaving little room to the invocation of 'inherent powers' in the proceedings before it".²⁶ Trial Chambers are not, accordingly, free to create unenumerated exceptions to the requirement in Article 63(1) that "[t]he accused shall be present during trial".²⁷
15. The Prosecution's submission of the entirety of the potential rebuttal witness's testimony has, unfortunately, undermined the purpose of the Trial Chamber's

²⁴ Article 67(2) ("In case of doubt as to the application of this paragraph, the Court shall decide.") Although this provision does not expressly authorize *ex parte* review, it has been observed that "it would obviously defeat the purpose of the provision to allow the defence access to such evidence prior to the determination by the Court that it must be disclosed"). William A. Schabas and Yvonne McDermott, "Article 67 Rights of the Accused", *The Rome Statute of the International Criminal Court: A Commentary*, Triffterer/Ambos, C.H.BECK, Hart, Nomos, 3rd edition, pp. 1650-1680 at p. 1677.

²⁵ Article 72(5)(d) (national security information); Rule 88(2) (necessity of measures to facilitate the testimony of a traumatised victim or witness); Article 18(6) and Rule 57 (seeking authority for investigative steps to preserve evidence); Rule 74(4) (offering assurances to a witness who may self-incriminate); Rule 81(2) (non-disclosure on the basis that such disclosure may "may prejudice further or ongoing investigations").

²⁶ *Bemba et al.*, Judgment on the appeals of the Prosecutor, Mr Jean-Pierre Bemba Gombo, Mr Fidèle Babala Wandu and Mr Narcisse Arido against the decision of Trial Chamber VII entitled "Decision on Sentence pursuant to Article 76 of the Statute," 8 March 2018, ICC-01/05-01/13-2276-Red, para. 79.

²⁷ The Appeals Chamber has previously contemplated the possibility that Rule 77 material being provided to a Chamber for an *ex parte* review. *Banda & Jerbo*, Prosecution request for notice to be given of a possible recharacterisation pursuant to regulation 55(2), 9 March 2015, ICC-02/05-03/09-501, para. 39. However, the parties do not appear to have made submissions on the propriety of this *ex parte* procedure under the Statute or Rules.

Decision. The Trial Chamber has now been more fully exposed *ex parte* to all of the information provided by the witness, and the Prosecution has characterised the information as incriminatory. Regardless of whether the Prosecution misinterpreted the scope of the information that the Trial Chamber intended to receive,²⁸ the extent of prejudice arising from the *ex parte* submissions is now greater than before the Prosecution's further *ex parte* submissions.

(ii) ***Rule 81(4) does not justify non-disclosure of the substantive information that has now been conveyed to the Trial Chamber on an ex parte basis***

16. The Prosecution asserts that none of the substantive information provided by the witness can be disclosed to the Defence because “the specificity of the information will identify” the person in question.²⁹
17. The Defence is deprived of the ability to make meaningful submissions on the Prosecution's submissions because of their *ex parte* nature. Nonetheless, four observations can be made based on the information that has been disclosed to the Defence.
18. First, the Defence still has no information concerning the subject-matter of the potential rebuttal witness's information. The Prosecution's position, accordingly, is that witness protection concerns justify complete non-disclosure. The Defence questions whether this claim – that none of the substantive information can be communicated without revealing the witness identity – is substantiated. The Trial Chamber already appears to have adopted a contrary view in respect of the redactions applied to filings ICC-01/04-02/06-2148 and ICC-01/04-02/06-2179.³⁰

²⁸ Prosecution's argument that this ostensibly “incriminatory” information is not material is manifestly inconsistent with the Trial Chamber's ruling. Defence notes that Rule 77 has been interpreted broadly by the Appeals Chamber.

²⁹ Prosecution Request, para. 4.

³⁰ Decision, paras. 22, 25.

19. Second, a party making *ex parte* submissions is under a duty of candour, including proactively raising all facts and arguments that may be adverse to the applicant.³¹ The Trial Chamber is requested to scrutinise all filings in relation to this matter to assess whether it believes that this duty has been met throughout the litigation of this matter. The Prosecution's dual claims concerning the witness's protection concerns, as well as whether identity would be disclosed, should both be assessed in light of whether all facts adverse to the Prosecution are available for the Trial Chamber's consideration.
20. Third, complete non-disclosure of information that is otherwise subject to disclosure under Rule 77, and which has now been provided to the Trial Chamber on an *ex parte* basis as Annexes A and B to the Prosecution Request, occasions serious prejudice to the accused's right to a fair trial. The prejudice is only magnified further if, as the Prosecution claims, this information is "incriminatory."³² The Trial Chamber's finding of 15 February 2018 that "non-disclosure of this person's identity is justified and necessary, and, noting that this information will not be adduced, not unduly prejudicial to the accused" should now be re-evaluated in light of these additional facts.³³
21. In particular, the Trial Chamber should now carefully scrutinise whether the witness protection concerns before it: (i) are substantiated, and (ii) even if substantiated, outweighs the prejudice to the fairness of proceedings caused by permitting extensive information concerning the merits of this case, which are said to be "incriminatory," to remain *ex parte*. The Defence questions whether the witness has affirmed his or her witness protection concerns, and

³¹ See e.g. *Australia, Thomas A. Edison Ltd v Bullock*, (1912) 15 CLR 679 at 681 ("*Uberrima fides* is required, and the party inducing the Court to act in the absence of the other party, fails in his obligation unless he supplies the place of the absent party to the extent of bringing forward all the material facts which that party would presumably have brought forward in his defence to that application"); *South Africa, National Director of Public Prosecutions v Basson*, [2001] ZASCA 111, para. 21 ("utmost good faith must be observed. All material facts must be disclosed which might influence a court in coming to its decision").

³² Prosecution Request, para. 9.

³³ Decision on expedited Defence request for reclassification of *ex parte* documents, 15 February 2018, ICC-01/04-02/06-2230, para. 11.

their basis, under oath. D-0172's concerns, for instance, were not accepted by the Trial Chamber.³⁴ Many sources express concern for their security when they meet with parties from the International Criminal Court. The disclosure regime prescribed by the statutory instruments of the court, which is designed to preserve trial fairness, cannot be conditional on a source failing to express witness protection concerns. In light of the substantial prejudice that would now arise from non-disclosure of the source's identity, and the apparently broad non-disclosure upon which the Prosecution insists as a corollary, the Defence urges the Trial Chamber to apply the highest standard of scrutiny and proof before determining that non-disclosure is justified under Rule 81(4).

(iii) *The only adequate remedy is for the Prosecution to disclose the entirety of the information submitted to the Trial Chamber; in the alternative, the Trial Chamber should order the fullest possible disclosure of the information short of revealing the witness's identity*

22. The Trial Chamber is requested to order full disclosure of all information that it has received on an *ex parte* basis, including the identity of the potential rebuttal witness. Although the Trial Chamber found on 15 February 2018 that non-disclosure of this witness's identity was "justified and necessary,"³⁵ the situation has now fundamentally changed. The Trial Chamber has now received, by all appearances, extensive *ex parte* submissions that ostensibly concern the merits of this case and are incriminating. The issue is not whether the Trial Judges are psychologically or professionally capable of banishing this information from their minds in their deliberations; the issue, rather, is: (i) the direct violation of Article 63(1); (ii) the offering of *ex parte* submissions that are not statutorily authorised; and (iii) the impact on the fairness of the trial and the reasonable apprehension of bias arising from substantial *ex parte* submissions having been made, combined with the provision of incriminating information on an *ex parte* basis.

³⁴ ICC-01/04-02/06-T-245-CONF-ENG, p.11 ln. 2-10, 14-20.

³⁵ Decision on expedited Defence request for reclassification of *ex parte* documents, 15 February 2018, ICC-01/04-02/06-2230, para. 11.

23. The non-disclosure has caused, and is causing ongoing, prejudice. The purpose of Rule 77 is to allow the Defence, *inter alia*, to pursue investigative leads, in particular, on the basis of information obtained by the Prosecution. This is an integral part of trial fairness, given the broad investigative powers and obligations imposed on the Prosecution by virtue of Article 54(1)(a) of the Statute. The Prosecution has with-held this information from the Defence since before the close of the Defence case.
24. Disclosure is required not only because the information is disclosable under Rule 77, but also because the accused has the right to know what information concerning the merits of this case have been presented to the Trial Chamber on an *ex parte* basis. Whatever security concerns may have justified non-disclosure of the potential witness's identity are now substantially outweighed by the *ex parte* submissions that have been made by the Prosecution.
25. Any finding under Rule 81 "must be supported by sufficient reasoning" which includes addressing the three factors relevant to the application of that Rule: (i) the nature of the alleged endangerment to the person; (ii) the necessity of the non-disclosure as a protective measure; and (iii) "why the [Chamber] consider[s] that the measure would not be prejudicial to or inconsistent with the rights of the accused and a fair and impartial trial."³⁶ The objective justification for the protective measure, moreover, can lessen over time

³⁶ *Lubanga*, Judgment on the appeal of Mr. Thomas Lubanga Dyilo against the decision of the Pre-Trial Chamber I entitled "First Decision on the Prosecution Requests and Amended Requests for Redactions under Rule 81", 14 December 2006, ICC-01/04-01/06-773, para. 21. Decision on Prosecution application for authorisation to provide a summary of Witness P-0040's statement and to apply redactions to the statement's annexes, 8 April 2015, ICC-01/04-02/06-550-Red, para. 8 ("i) the existence of an 'objectively justifiable risk' to the safety of the person concerned; ii) the risk must arise from disclosing the particular information to the Defence; iii) the infeasibility or insufficiency of less restrictive protective measures; iv) an assessment as to whether the redactions sought are 'prejudicial to or inconsistent with the rights of the accused and a fair and impartial trial'; and v) the obligation to periodically review the decision authorising the redactions should circumstances change.")

depending on the stage of proceedings.³⁷ The objective degree of threat must be assessed in light of the fact that the case is now closed.

26. The identity of the person who provided the information is essential, not merely incidental, to the Defence's understanding of the information. The situation is not analogous to with-holding the name of a victim in another person's statement.³⁸
27. The Prosecution's own submissions seem to suggest that with-holding all witness-identifying information will denude the material of all meaning. The clear and proximate needs of preserving the fairness of the trial must, in these circumstances, prevail over speculative apprehensions about security. The demands of a fair trial often demand the cooperation of individuals who may feel anxious about that cooperation.
28. The Defence likewise requests that the Prosecution be ordered to provide versions of all relevant and related filings with no redactions whatsoever – including the Prosecution Request itself.
29. In the alternative, the Trial Chamber is requested to order the fullest possible disclosure consistent with concealing the witness's identity. This disclosure should extend to *ex parte* Annexes A and B to the Prosecution Request, as well as all other related filings, including the Prosecution Request itself.

³⁷ *Ntaganda*, Decision on Prosecution application for authorisation to provide a summary of Witness P-0040's statement and to apply redactions to the statement's annexes, 8 April 2015, ICC-01/04-02/06-550-Red, para. 14 ("The Chamber therefore authorises the redactions sought to identifying information contained in the statement's annexes and any related metadata, until there is a relevant change of circumstance").

³⁸ *Katanga & Ngudjolo Chui*, Judgment on the appeal of Mr Mathieu Ngudjolo against the decision of Pre-Trial the Pre-Trial Chamber I entitled "Decision on the Prosecution Request for Authorisation to Redact Statements of Witnesses 4 and 9", 27 May 2008, ICC-01/04-01/07-521, para. 32-36 (upholding the non-disclosure of the name of a victim in a witness statement provided by another person (whose name was not redacted)).

CONCLUSION AND RELIEF REQUESTED

30. The Prosecution request to with-hold any information, including the identity of the potential witness, under Rule 81(4), should be denied. All notes or statements provided by the potential witnesses, and in the Prosecution's possession, is subject to disclosure under Rule 77 and should be provided to the Defence. Furthermore, Annexes A and B of the Prosecution Request are subject to re-classification given the right of the accused to be "present during the trial" and the lack of statutory justification for the submission of this merits-related information to the Chamber *ex parte*. The non-reclassification of this material causes severe prejudice to the fairness of the trial.
31. The Defence, for the same reasons, requests reclassification of filing ICC-01/04-02/06-2148, filing ICC-01/04-02/06-2179, the Prosecution Request, and all other related Prosecution filings that are to any extent *ex parte*. Any such orders for disclosure may be accompanied by non-disclosure orders addressed to the Defence and the accused, and by any other protective measures deemed necessary and appropriate.
32. In the alternative, if non-disclosure of the potential witness's identity is deemed necessary and justified under Rule 81(4) or on any other basis, the Trial Chamber is requested to order the Prosecution to provide the least redacted version of Annexes A and B of the Prosecution Request consistent with preserving his or her anonymity, as well as lesser-redacted versions of filing ICC-01/04-02/06-2148, filing ICC-01/04-02/06-2179, the Prosecution Request, and any other related Prosecution filings that are to any extent *ex parte*.

CONFIDENTIALITY

33. This Defence Response is filed confidential pursuant to Regulation 23*bis* (2) of the Regulations of the Court ("RoC"). However, the Defence requests that the Prosecution Notice and this filing be reclassified public.

RESPECTFULLY SUBMITTED ON THIS 26th DAY OF MARCH 2018

A handwritten signature in dark ink, appearing to read 'StB' with a small horizontal line at the end.

Me Stéphane Bourgon, Counsel for Bosco Ntaganda

The Hague, The Netherlands