

**Cour  
Pénale  
Internationale**



**International  
Criminal  
Court**

*Original: English*

No.: ICC-01/04-02/06-2447

Date: 10 January 2020

**TRIAL CHAMBER VI**

Before: Judge Chang-ho Chung, Single Judge

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**SITUATION IN DEMOCRATIC REPUBLIC OF THE CONGO**

**IN THE CASE OF**

*THE PROSECUTOR v. Bosco Ntaganda*

**Public Document**

**Request for Leave to Submit Observations on the issues set out under point 9 (c)  
of the Order ICC-01/04-02/06-2447**

Source: **INTERNATIONAL ORGANIZATION FOR MIGRATION**

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

**The Office of the Prosecutor**

Ms Fatou Bensuda  
Mr James Stewart  
Ms Nicole Samson

**Counsel for the Defence**

Mr Christopher Gosnell

**Legal Representatives of the Victims**

Ms Sarah Pellet

**Legal Representatives of the Applicants**

**Unrepresented Victims**

**Unrepresented Applicants  
(Participation/Reparation)**

**The Office of Public Counsel for  
Victims**

Ms Paolina Massida

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

**States' Representatives**

**Amicus Curiae**

**REGISTRY**

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**Registrar**

M. Peter Lewis

**Counsel Support Section**

**Victims and Witnesses Unit**

Mr Nigel Verrill

**Detention Section**

**Victims Participation and Reparations  
Section**

Mr Philipp Ambach

**Trust Fund for Victims**

Mr Pieter de Baan

1. This Request for leave to submit Observations on the issues set out under point 9 (c) of the Order setting deadlines in relation to reparations (ICC-01/04-02/06-2447), in the context of the reparation phase is filed pursuant paragraph 9 (e) of that Order and Rule 103.

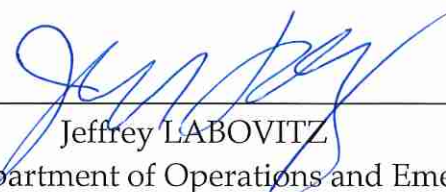
## I. Background

2. In the Order of 5 December 2019 (ICC-01/04-02/06-2447) the Trial Chamber VI invited any interested organization in making submission in the context for reparations proceedings in the *Ntaganda* case, on the following issues:

- i. whether the principles on reparations established by the Appeals Chamber in the Lubanga case need to be amended or supplemented in light of the circumstances of the Ntaganda case;*
- ii. the criteria and the methodology to be applied in the determination and the assessment of: (i) the eligibility of victims; (ii) the relevant types and scope of harm; and (iii) the scope of liability of Mr Ntaganda, including the determination of the precise extent of the (monetary) obligations to be imposed on him;*
- iii. the types and modalities of reparations appropriate to address the types of harm relevant in the circumstances of the Ntaganda case, including factors relating to the appropriateness of awarding reparations on an individual basis, a collective basis, or both; ICC-01/04-02/06-2447 05-12-2019 5/7 NM T  
No. ICC-01/04-02/06 6/7 5 December 2019*
- iv. for the parties and the TFV, any responses to the Registry's identification of potential experts; and*
- v. any other issue the parties, the Registry, and the TFV wish to bring to the attention of the Chamber."*

## II. Request for Leave

3. As instructed, IOM hereby files the request for leave to the Chamber and if leave is granted, IOM will provide the submission of up to 20 pages (9.e - applicable to organizations) to be filed by 28 February 2020.

  
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Jeffrey LABOVITZ  
Director, Department of Operations and Emergencies  
**International Organizations For Migration**

Dated this 10 January 2020

At Geneva, Switzerland