

**Cour
Pénale
Internationale**



**International
Criminal
Court**

Original: English

No.: ICC-02/04-01/15

Date: 7 June 2021

TRIAL CHAMBER IX

Before: Judge Bertram Schmitt, Presiding Judge
Judge Péter KovácsTitle
Judge Raul C. PangalanganTitle
Choose ICC Judge...Title
Choose ICC Judge...Title

SITUATION IN UGANDA

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

Public Document

**Request for Leave to Submit Observations on the issues set out under point 5 (iii)
of the Order No. ICC-02/04-01/15**

Source: REFUGEE LAW PROJECT ('RLP')

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

Counsel for the Defence

Mr Krispus Ayena Odongo

Legal Representatives of the Victims

Mr Joseph Akwenyu Manoba

Legal Representatives of the Applicants

[1 name per team maximum]

Unrepresented Victims

Unrepresented Applicants

(Participation/Reparation)

**The Office of Public Counsel for
Victims**

Ms Paolina Massidda

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

[2 names maximum]

States' Representatives

Competent authorities of the Republic of
Uganda

Amicus Curiae

REGISTRY

Registrar

M. Peter Lewis

Counsel Support Section

Victims and Witnesses Unit

Mr Nigel Verrill

Detention Section

**Victims Participation and Reparations
Section**

Mr Philipp Ambach

Other

1. Refugee Law Project (RLP) respectfully requests the Pre-Trial Chamber IX (the “Chamber”) for leave to submit amicus curiae observations pursuant to Rule 103 of the Rules of Procedure and Evidence (“RPE”) in the Situation in Uganda in the case of the Prosecutor V. Dominic Ongwen.

I. Introduction

2. The Refugee Law Project (RLP), a Centre for Justice and Forced Migrants, is an Outreach Project of the School of Law, Makerere University. It seeks to ensure fundamental human rights for all forced migrants and their hosts. Under its Conflict, Transitional Justice & Governance (CTJ&G) Programme, RLP strategically confronts the challenges of dealing with legacies of past atrocities and human rights violations, the pursuit of justice - locally and globally, the promotion of democratisation and good governance, and sustainable peace building. It focuses on addressing the multiple gaps in access to justice for forced migrants, both justice for every day civil and criminal matters before formal and informal justice platforms, and transitional justice for the unaddressed harms experienced during armed conflict as well as other mass violations of rights.
3. RLP is recognized as a leading organization in the field of transitional justice in Uganda. Since 1999, RLP has worked with communities emerging from armed conflict, providing medical rehabilitation assistance, promoting local level truth-telling and reconciliation and traditional justice as contributions to addressing impunity and accountability. RLP has conducted victim consultations in areas under the jurisdiction of the Ongwen case (e.g. Odek in Omoro, Lokodi, Pajule), and has also worked closely with the ICC Outreach Office in Uganda in the various capacities, including organising live and recorded screenings of the trial proceedings, accompanied by psychosocial support to participants at such screenings.
4. RLP’s intended submission will draw from its over 20 years work with victims and victim-communities in transitional justice particularly medical rehabilitation and working with victims support groups in northern Uganda. We seek to focus on how reparations need to take into consideration;
 - a. Evidence of the direct and indirect costs involved in medical repair of victims with long-standing untreated injuries
 - b. Those who continue to be violated because of various identities arising from their experiences during the war, such as returned abductees, those born in captivity, and those returning with children born of war.
 - c. Those with major ongoing psychological support needs

- d. The psychosocial needs that persist even where immediate individual medical and psychological needs have been addressed. These arise particularly in survivor support groups, frequently focused on livelihood issues.

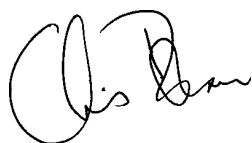
II. Background

5. On 6 May 2021 (No. ICC-02/04-01/15), the Trial Chamber IX issued an order for reparations in which directions were issued in order to ensure fair and expeditious reparations proceedings for victims in the Ongwen case. In particular, the chamber issues informing any persons or organizations, particularly with local expertise, interested in making submissions on the specific issues mentioned above, are invited to request leave from the Chamber, pursuant to article 75 of the Statute and rule 103 of the Rules, by Monday 7 June 2021.¹

III. Request for Leave

6. RLP's intended submission will draw upon its over 20 years work with both direct and indirect victims and their communities in transitional justice particularly through medical rehabilitation and working with victims support groups in northern Uganda.
7. As instructed, RLP hereby respectfully files the request for leave to the Chamber and if leave is granted, RLP will provide the submission of up to 20 pages (5.iii-applicable to organisations) to be filled by Monday 6 September 2021.

SIGNATURE/DATE



Dr CHRIS DOLAN
DIRECTOR

Dated this 7 JUNE 2021

At [Kampala, Uganda]

¹ No. ICC-02/04-01/15