

**Cour
Pénale
Internationale**



**International
Criminal
Court**

Original: English

No.: ICC-02/04-01/15 A
Date: **November 12th 2021**

THE APPEALS CHAMBER

Before: Judge Luz del Carmen Ibáñez Carranza, President
Judge Piotr Hofmański, Judge
Judge Solomy Balungi Bossa, Judge
Judge Reine Alapini-Gansou, Judge
Judge Gocha Lordkipanidze, Judge

SITUATION IN UGANDA

IN THE CASE OF
THE PROSECUTOR v. Dominic Ongwen

Public Document

**Request for leave to submit an amicus curiae pursuant to rule 103 (1) on issues
related to duress and mental defect**

Source: Ronald Rijnders

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

The Office of the Prosecutor

Mr Karim A.A.Khan, prosecutor
Ms Helen Brady

Counsel for the Defence

Mr Krispus Ayena Odongo
Chief Charles Achaleke Taku

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**

[2 names maximum]

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

[2 names maximum]

States' Representatives

Amicus Curiae

REGISTRY

Registrar

M. Peter Lewis

Counsel Support Section

Victims and Witnesses Unit

Detention Section

**Victims Participation and Reparations
Section**

Other

I refer to your call for expressions of interest as amicus curiae in judicial proceedings relating to the case of the Prosecutor vs Dominic Ongwen (document reference ICC-02/04-01/15 A).

I am a forensic psychiatrist by profession, and have extensive experience in working with criminals. In addition, I have worked as a physician in war zones such as Mozambique, Honduras and Afghanistan. As a psychiatrist in a nationwide Dutch trauma clinic, I gained a lot of experience with psychiatric treatment of war-related traumatized asylum seekers and refugees. Among them I have regularly treated traumatized child soldiers from different African countries.

My remarks will focus on the evidentiary issues related to mental illness or mentally deficient development. In my experience, traumatic events are more damaging to children and adolescents than to - presumably more balanced - adults. Such events can lead to a serious negative impact on basic trust, ultimately resulting in severe attachment disorder. The latter can lead to skewed personality development manifested in deteriorated cognitive abilities, emotional imbalance and dysregulated behavior.

While a post-traumatic change to a safe and predictable environment can lead to mental and behavioral improvements, continued exposure to an unsafe and unpredictable environment, on the contrary, can lead to chronic dysfunctionalities, for example, chronic post-traumatic stress disorder. In addition, it can lead to deficient personality development, sometimes described as post-traumatic personality disorder.

Since every patient is different and I have not examined Dominic Ongwen myself, it is impossible for me to give a specific diagnosis about his current and former mental situation. However, it is quite possible that as an individual exposed from such a young age and for such a long time to an environment such as within the LRA, he may have developed disorders such as those mentioned above.

Please find my C.V. below:

Curriculum Vitae

Surname	RIJNDERS
Given names	Ronald Johannes Petrus
Date of birth	10 November, 1956
Place of birth	Rijswijk, the Netherlands
Current address	Van der Paauwkade 34, Leiden, the Netherlands
Zip code	2316 NA
Telephone	06 – 44494836
E-mail	Private: rynders@xs4all.nl ; Work: r.rijnders@dji.minjus.nl
Registered	As Medical doctor and psychiatrist in the Netherlands medical register (“B.I.G.-register”); number 89023634601 As rapporteur pro Justitia at the Netherlands register of forensic experts (NRGD); number NRGD.1009.73

Relevant Education

1975 – 1983	University degree in Medicine at Leiden University (graduated with designation “cum laude”)
1983 – 1984	Postgraduate education at the Prince Leopold Institute for Tropical Medicine, Antwerp, Belgium (graduated with designation "with distinction")
1991 – 1995	Specialization in psychiatry at the ‘Hague-Delft Training Consortium Psychiatry’ with internships in psychiatric hospitals in The Hague, Delft and Noordwijkerhout, the Netherlands

Relevant Work Experience (past)

1985 – 1986	Doctor of Tropical Medicine for the non-governmental organization "Médecins sans Frontières" (Doctors without Borders), Paris. Missions in Honduras, Mozambique, and Afghanistan
1987 – 1988	Medical doctor in EuroCross, Emergency and Repatriation Organization, Noordwijk
1988 – 1991	Medical doctor in St. Joris Gasthuis, psychiatric hospital, Delft
1991 – 1996	Intern in psychiatry in several psychiatric hospitals in The Hague, Delft, and Noordwijkerhout, the Netherlands
1993	Research report on survivors of a Moroccan secret military prison: Van Ginneken, E. & Rijnders, R.J.P. “Tazmamart, fort-militaire-secret du Maroc: conséquences d'un internement de 18 années”. Johannes Wier Foundation, Amersfoort
1992 – 2005	Liaison psychiatrist in Rijnland General Hospital, Leiderdorp
1996 – 2006	Psychiatrist in Centrum '45, psychiatric hospital for traumatized asylum seekers and refugees, Noordwijkerhout (last two years as Head of the clinical ward)
2012 – 2019	Board member of the Foundation iMMO (institute of human rights and medical assessment)

Relevant Work Experience (current)

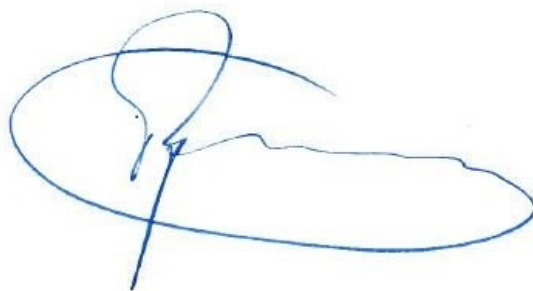
1992 – present	Psychiatrist in psychiatric hospital GGZ Delfland, Delft
2006 – present	Forensic psychiatrist at the Netherlands Institute of Forensic Psychiatry and Psychology (NIFP), location “Pieter Baan Centrum”, Almere. Forensic Rapporteur sworn by the Hague Court (14 December, 2006), Scientific Researcher at the NIFP (research topic is ‘psychopathy’)

2007 – present Psychiatrist in psychiatric hospital Bouman/Antes, mental health institution for addicted patients (one day per week).
 2009 – present Private practice as psychiatrist
 2017 – present Member of the Advice Commission Lifesentenced Detainees

Membership Netherlands Association of Psychiatry
 Interdisciplinary Working Group ‘Trauma and Neurobiology’
 Psychiatrist Intervention Group

Language fluency English (good); French and Spanish (average); Portuguese (poor).

I look forward to your response and am at your disposal to elaborate on the observations made in this letter.



Ronald Rijnders

Dated this November 12th 2021 at Leiden, The Netherlands

At [place, country]