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ITEM	PARTICULARS	PURPOSE TO BE SERVED BY THE DOCUMENTS ON THE CHARGES
1	KRIEGLER REPORT ; EUROPEAN UNION REPORT AND ARTICLE BY HUMANITARIAN POLICY GROUP [HPG] "HPG POLICY BRIEF 31" OF APRIL 2008	-To show Presidential election results were contested and the Post Election Violence was a spontaneous uprising not a planned systematic violence.
2	AKIWUMI AND KILIKU REPORTS	-To show there have been previous spontaneous violence not planned by the suspects.
3	GAZETTE NOTICES	-To show that William Ruto was not at the venue of the alleged incident by the prosecution.
4	SEARCH RESULTS FOR EMO FOUNDATION	-To show the nature and purpose of EMO-not a structure to orchestrate violence.
5	ELECTION RESULTS OF ELDORET NORTH,CHERANG' ANY AND NANDI CONSTITUENCIES ; THE 2009 POPULATION AND HOUSING CENSUS RESULTS OF 31 ST AUGUST 2011	-To show there were and there are PNU voters at the respective constituencies, hence untrue to say W.Ruto and other suspects chose and intimidated them. -To show tribal distribution in the respective constituencies.
6	11 PHOTOGRAPHS TAKEN OF THE FOOTBALL TOURNAMENT SPONSORED BY JOSHUA ARAP SANG ON 30 TH DECEMBER 2011	-To show that Joshua Sang was not at the venue of the alleged incident by the prosecution on 30 th December 2007.
7	FLIGHT'S REPORTS AND EVIDENCE	-To show suspect's flight itinerary and the people they travelled with, contrary to what the prosecution's witnesses allege.
8	3 ARCHITECTURAL DRAWINGS AND PLANS OF HON. WILLIAM RUTO'S HOME-SUGOI	-To show William Ruto's house is incapable of accommodating the alleged guns, grenades or gas cylinders
9	PHOTOGRAPHS AND VIDEOS OF HON. WILLIAM RUTO'S HOME-SUGOI AND THE MOLO MILK PLANT	-To show Hon. Ruto's home and milk plant do not have the electric fence alleged by prosecution witnesses.
10	KASS FM ADVERTISING BOOKING SHEET ,KASS FM VISITOR'S BOOK AND KASS ANNOUNCEMENTS.	-To show Kass FM accommodated all political parties and people of all opinions, not ODM only, or William Ruto or Henry Kosgey alone. -To also show that Kass FM had no clergy by the name Reverend Jackson Bett, as alleged, who was a

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		colossus at the station and in the Kalenjin community.
11	<p>ALL NEWSPAPERS ARTICLES AND CD's (Both Audio and Video CD's) of Ruto showing rallies and meetings on various dates held across the country and 5 CDs of Sang on;-</p> <ul style="list-style-type: none"> i. Interview with Ranneberger ii. Interview with IDP Representatives iii. Joshua Arap Sang Peace messages iv. Joshua Arap Sang's broadcast after being named by the Prosecutor. 	<p>-To show the suspects were not at the alleged venues, and did not say what is alleged, and are not people inclined to violent and criminal character as alleged.</p> <p>-To show that the systematic hierarchical, structure with respect to the suspects did not exist, and neither did the alleged organizational policy.</p>
12	TELEPHONE HYBRID DESIGN AND SPECIFICATIONS	-To show it is impossible to know who is calling into the station hence to choose who to give audience and whom to exclude.
13	PRESS STATEMENT OF JOSHUA ARAP SANG	
14	LETTERS OF APPOINTMENT AND DUTIES OF JOSHUA ARAP SANG	-To show J. Sang was an employee at Kass FM incapable of deciding policies and objectives of Kass FM; hence incapable of using the station for the desires of his own ends(even assuming he had any)
15	LETTER FROM KENYA PRISONS SHOWING <i>FRED KAPONDI</i> WAS IN PRISON FROM 17 TH APRIL 2007 TO 14 TH DECEMBER 2007 AND TWO (2) NEWSPAPER PUBLICATIONS REPORTING THE RELEASE.	-To show that the allegations as to the source and procurement of the guns is false.
16	JUDGEMENT HIGH COURT- NAKURU-KENYA-HIGH COURT CRIMINAL CASE NO 34 OF 2008- Dated 30 th April 2009 Honourable Justice D.K. Maraga.	-To show how untrue allegations (e.g. ascribing unrelated deaths to Kiambaa incident) have been imported into post election violence situation.

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17	BOOKS ON KALENJIN SOCIAL STRUCTURE, AGE GROUPS AND WAR DYNAMICS [Total of Eight (8) Books; Note: some are online]	-To contest allegations of organizational structure and hierarchy allegedly based on Kalenjin values and structures, including the place of an enthroned elder; and the truth of alleged unquestioning obedience; and oathing.
18	<p>ALL WITNESS STATEMENTS</p> <ol style="list-style-type: none"> 1. Joseph Kairuri Mwangi. 2. Reverend Stephen Mburu Ngugi. 3. Joseph Githuku Kanyura. 4. Eliud Kipng'etich Letting. 5. Weley Kiprono Kurgat. 6. Samwel Kariuki Ndung'u. 7. Paul Githinji. 8. Mathew Angwenyi Kibagendi. 9. Geoffrey Mokaya Angwenyi. 10. Nelson Kiplagat Koech. 11. Pastor Sammy Mbugua 12. David Nyambane 13. Shadrack Mbugua 14. John Kimani Mwaura 15. William Serem 16. Bishop Cornelius Arap Korir 17. Pastor Peter Chemaswet 18. Hellen Chepkoech Baliach 19. Boniface W. Walumbe 20. Samson Kimeli Maiyo 21. Michael Kosgei 22. Silas K Tarus 23. David K Lagat 24. James K Soimo 25. Anthony K Chebet 26. Ronald C Malakwen 27. Benson Chelang'a 28. Joshua C Kibor 29. Kipkemboi Maiyo 30. Davis Bosire Omariba 31. Julius Kosgei 32. Isaac Bitok 33. Simon Lilan 34. Cllr Julius Kiprono Ruto 	<p>All witnesses to show:-</p> <ol style="list-style-type: none"> i) The suspects are not responsible for the post election murders, transfers, deportations, torture and/or persecution. ii) The suspects are not culpable for the organizational policy. iii) The suspects are not part of any criminal network. iv) The suspects are not party to any express or implied design to raise funds to finance the post election violence. v) The suspects were not party to any coded language scheme, formulated to attack people belonging to PNU, or people who are kikuyus, or Kisiis or Kambaas. vi) The suspects did not convene and did not attend any oathing ceremonies to bind themselves to commit any crimes as alleged in this case. vii) The suspects did not organize, nor attend, nor countenance the constitution of any meetings to formulate violence and its logistics. viii) The suspects are not part of any propaganda machine designed to advance

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	<p>35. Joseph Cheboi Koech 36. Julius Lamaon 37. Anthony K. Chebet 38. Immanuel Chodotum 39. Brian Kiprotich Chemjor 40. Benson K. Chelang'a 41. William (Bill) Kipkoech Ruto 42. Daniel Komen 43. Francis Cheruiyot Arap Maritim 44. Samuel Kimeli Kosgei 45. David Cheruiyot Ng'enda 46. William Samoei Ruto</p>	<p>violence. ix) To show the suspects were not at the locations alleged by the prosecutor, and or did not say and or do what is alleged they said and or the events alleged by the prosecution witnesses did not happen, or otherwise did not happen as alleged by the prosecution witnesses. x) To show that the suspects were and are undergoing investigations in Kenya. xi) To show that the suspects were not party to any widespread and or systematic attack group. xii) To show that the suspects were not party of any criminal group organized with hierarchical structure for political, media, tribal and military components designed to provide leadership logistical, financial arming and networking, broadcasting propaganda sending coded messages or procuring strict obedience.</p>
19	A CD of Sang Interviewing Moreno Ocampo	-To show the prosecutor did nothing towards discharging his obligation to investigate exonerating evidence under Article 54 at all, and even when he had the opportunity to.
20	LETTER FROM INTERIM INDEPENDENT ELECTORAL COMMISSION DATED 11 TH AUGUST 2011	
21	REPORT ON STATUS OF IMPLEMENTATION OF RESETTLEMENT OF 2007/2008	-To disprove allegation in the charges of permanent eviction from Rift-Valley.

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	DISPLACED PERSONS AS AT JANUARY 2009	
22	LUCAS KIPKEMBOI SANG'S EULOGY	-To show date of funeral. -To show absence of J. Sang at the funeral; And also that he was therefore not the master of ceremony.
23	WILLIAM RUTO SAMOEI'S STATEMENT	-To state his innocence
24	JOSHUA ARAP SANG'S STATEMENT	-To state his innocence
25	CONSTITUTION OF KENYA	-To show inter-alia the pre-existing injustices are acknowledge by the Kenyan nation, requiring redress to stem possibility of any future violence.