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**Tribunal Pénal International pour le Rwanda
International Criminal Tribunal for Rwanda**

OFFICE OF THE PRESIDENT

Before: Judge Khalida Rachid Khan, *President*
Registrar: Adama Dieng
Date: 5 March 2012

JUDICIAL RECORDS ARCHIVES
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- PROSECUTOR v. NIYITEGEKA**
Case No. ICTR-96-14
- PROSECUTOR v. NTAKIRUTIMANA et al.** ✓
Case No. ICTR-96-10/17
- PROSECUTOR v. NYIRAMASUHUKO et al.**
Case No. ICTR-98-42
- PROSECUTOR v. BIZIMUNGU et al.**
Case No. ICTR-99-50
- PROSECUTOR v. NDINDILYIMANA et al.**
Case No. ICTR-00-56
- PROSECUTOR v. NDINDABAHIZI**
Case No. ICTR-01-71

**JACQUES MUNGWARERE'S SECOND URGENT MOTION FOR ACCESS TO
MATERIAL and
NOTICE UNDER RULE 67(D)**

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Public Prosecution Service of Canada
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Ottawa Superior Court
C/o The Honorable Louis Z. Charbonneau

**International Criminal Tribunal for Rwanda
Tribunal pénal international pour le Rwanda**
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I. INTRODUCTION

1. As a preliminary matter, the applicant indicates that these requests in the following six cases: *Niyitegeka*¹, *Ntakirutimana et al.*², *Nyiramasuhuko et al.*³, *Bizimungu et al.*⁴, *Ndindiliyimana et al.*⁵, and *Ndindabahizi*⁶, are being submitted as a single Motion for the sake of efficiency and consistency, inasmuch as all of the arguments in law are the same for all of these six different cases.
2. Jacques Mungwarere is being prosecuted in Canada by the Public Prosecution Service of Canada (hereinafter "PPSC") for genocide and crimes against humanity allegedly committed in Kibuye *préfecture*, Rwanda, during the genocide in 1994.⁷
3. The trial of Mr. Mungwarere is scheduled to start on 30 April 2012. The Defence for Mr. Mungwarere therefore stresses the importance that these requests be addressed urgently.

II. APPLICABLE LAW

(a) Disclosure to the Defence in National Jurisdictions:

4. Rule 75 of the Rules of Procedure and Evidence of the Tribunal ("Rules"), provides for the routine disclosure of protected information between proceedings before the Tribunal.⁸ While no explicit provision of the Rules provides for disclosure of protected information to parties in proceedings before national jurisdictions, the Rules have been interpreted to enable such disclosure.

¹ Case No. ICTR-96-14

² Case No. ICTR-96-10/17

³ Case No. ICTR-98-42

⁴ Case No. ICTR-99-50

⁵ Case No. ICTR-00-56

⁶ Case No. ICTR-01-71

⁷ See *Sa majesté la reine et Jacques Mungwarere, acte d'accusation*, dated 12 May 2010, filed 1 June 2010 ("Indictment").

⁸ Rules 75(F) and (G) of the Rules.

5. The jurisprudence of the Tribunal has established that assistance to national prosecutions of crimes committed in Rwanda in 1994 is consistent with the goals of state cooperation under Article 28(1) of the Statute and Security Council Resolutions 1503 and 1534.⁹
6. When a party to other proceedings requests access to confidential material from another case, such material must be identified or described by its general nature and a "legitimate forensic purpose" for accessing it must be demonstrated.¹⁰ A case-specific analysis is required in each instance, and a Trial Chamber must be satisfied that the requesting party has established that this material is "likely to assist its case materially, or that there is at least a good chance that it would".¹¹
7. Consideration must also be given to the relevance of the material sought, which may be demonstrated by showing "the existence of a nexus between the requesting party's case and the case from which such material is sought."¹² Such a factual nexus may be established, for example, if the cases arise from events alleged to have occurred in the same geographic area at the same time, although this may not always be necessary or sufficient.¹³
8. It has been held that this same reasoning is also applicable to a request for disclosure to a party in domestic proceedings.¹⁴

⁹ *Prosecutor v. Nyiramasuhuko et al.*, Case No. ICTR-98-42-T, Decision on Prosecution's Motion to Unseal the Transcripts of Witness WBUSA, 1 November 2006, para. 15 ("Nyiramasuhuko et al. Decision"); See also *Prosecutor v. Muhimana, Kayishema et al., Nyitegeka, Ntakuritimana et al., Musema*, Case No. ICTR-95-1B, ICTR-95-1, ICTR-94-14, ICTR-96-10/17, ICTR-96-13, Decision on Prosecution's Urgent Ex Parte Motion to Unseal and Disclose Personal Information Sheets and Rescind Protective Measures for Certain Witnesses, 13 August 2008, para. 7 ("Muhimana et al. Decision")

¹⁰ *Prosecutor v. Rutaganda*, Case No. ICTR-96-3-R, Decision on Rutaganda's Appeal Concerning Access to Confidential Materials in the *Karemera et al.* case (AC), 10 July 2009, para. 28; See also *Prosecutor v. Karemera et al.*, Case No. ICTR-98-44-T, Decision on Callixte Nzabonimana's Motion for Access to Exhibit DNZ-461, 23 August 2010, para. 6. ("Karemera Decision")

¹¹ *Ibid.*

¹² *Ibid.*

¹³ *Ibid.*

¹⁴ *Prosecutor v. Nindiliyimana et al.*, Case No. ICTR-00-56-T, Decision on the Prosecution Motion to Unseal and Disclose to the Canadian Authorities the Closed Session Transcripts of Witness ANA (TC), 23 March 2007, para. 10; See also *Muhimana et al. Decision*, para. 7

9. Furthermore, it has been held, in the *Prosecution v. Simba*, that “the interest of justice requires a broad interpretation of Rule 75(F)(i) for variation of the protective orders even when the second case is not before the Tribunal but before another jurisdiction”.¹⁵ In that Decision, this reasoning was specifically applied to a request by the Defence in national proceedings and the required material was disclosed directly to the Defence of Mr. Charles Munyaneza in Great Britain.
10. Therefore, confidential material can and has been provided to parties *other* than national authorities, extending the interpretation of the Rules beyond the strict framework of “state cooperation”. It is submitted that such an approach, providing disclosure to the Defence in national proceedings, is appropriate in the present application, and should be followed in this instance.
11. Mr. Mungwarere respectfully submits that, pursuant to the spirit of Articles 20(2) and (4) of the Statute which provide for the right to a fair trial and equality of arms with the Prosecution, the Tribunal has an obligation to assist *both* the prosecution and defence of persons accused of committing serious violations of international humanitarian law.

b) Witness Protection and Confidentiality Issues:

12. Mr. Mungwarere is aware that most, if not all, of the material requested in this motion might be covered by protective measures granted pursuant to Rule 75(A) of the Rules. For obvious reasons, seeking the consent of the witnesses concerned to a variation of their protective measures in order to enable him to review their statements is impracticable.
13. However, according to the Tribunal’s jurisprudence, the consent of witnesses is not an absolute necessity in order to vary protective measures.¹⁶

¹⁵ *Prosecution v. Simba*, Case No. ICTR-01-76-R75, Decision on Charles Munyaneza’s Motion for Disclosure of Documents Related to Protected Witnesses Before the Tribunal (TC), 9 April 2008, para. 5 (“Simba Decision”)

¹⁶ Simba Decision, para. 8; See also *Prosecutor v. Ntzezimana*, Case No. ICTR-00-55C, Decision on Defence Motion for Variance of Witness Protective Measures and International Cooperation of the Government of Canada, 22 June 2011

14. Moreover, the Defence for Mr. Mungwarere submits that Rule 75(F)(i) of the Rules, which requires a broad interpretation in the interest of justice,¹⁷ provides for the extension of existing protective measures to enlarge the group of persons bound by them and allow for access to protected information, without the need for any variation of these protective measures under Rule 75(G) and therefore the consent of the concerned witnesses.
15. If the Chamber were to grant Mr. Mungwarere's request, since he does not seek to contact or disclose the identity of any of the witnesses identified in this material at this stage, but only to access it, an order to the effect that the existing protective measures apply *mutatis mutandis* to the parties would be sufficient and no variance is required.
16. In any case, in light of the increasing number of domestic prosecutions of serious violations of international law, and the approaching completion of the Tribunal's mandate, Mr. Mungwarere submits that it may be necessary for the Tribunal to develop a more efficient method of disclosing such material to parties in national proceedings.
17. Indeed, existing protective measures should not become an obstacle to the right of an accused to fully contest the charges brought against him. Existing protection measures that may have been warranted in the past may also have become totally irrelevant at this point. For example, if some witnesses have died, it will never be possible to obtain their consent to waive the protective measures covering their testimonies and statements, yet there exist provisions allowing the admission of that material, both at the ICTR and in Canada.

III. SUBMISSIONS

18. Mr. Mungwarere's Defence will raise the issues of false allegations and fabrication of evidence against people accused in connection with the Rwandan genocide of 1994

¹⁷ Simba Decision, para. 5

- before this Tribunal, in Rwanda, and elsewhere. Evidence to this effect will be presented through documents as well as witness and expert testimonies.
19. Therefore, Mr. Mungwarere seeks access to material related to evidence of witness tampering, intimidation, collusion and recantation, from the aforementioned proceedings to assist him in preparing his Defence.
20. It has been held in the *Prosecutor v. Karemera et al.*, that this kind of material is not only of interest to other Accused, but is also of general public interest.¹⁸ It is therefore highly relevant and serves a legitimate forensic purpose.¹⁹ It should also be stressed that in that Decision, the consent of the witness concerned was not sought or required.
21. The proceedings for which Mr. Mungwarere seeks disclosure of material relevant to his case are addressed in turn hereafter.

Niyitegeka

22. Paragraphs 398-399 of the *Niyitegeka* Trial Judgment²⁰ refers to allegations of pressures exerted by Assiel Kabera, former *préfet* of Kibuye under the RPF rule and prominent member of the IBUKA organization, on Defence witnesses TEN-6 and TEN-5, and potentially others, to make false allegations. In particular, during his testimony, TEN-6 recanted part of his prior statement dated 27 September 1995 where he stated that he had seen Mr. Niyitegeka and Mr. Karemera in Kibuye *préfecture* during the genocide.
23. Some Canadian Prosecution witnesses in Mr. Mungwarere's case are closely linked with Mr. Kabera as well as the IBUKA organization. Some have made prior statements against Mr. Niyitegeka and testified in the *Niyitegeka* case.
24. Mr. Mungwarere submits that evidence relating to these allegations of pressures exerted on witnesses in the *Niyitegeka* case regarding events in Kibuye *préfecture*

¹⁸ Karemera Decision, para. 4

¹⁹ Karemera Decision, para. 7

²⁰ *Niyitegeka*, Trial Judgement, 16 May 2003

shares a factual nexus and is material to his case. Therefore, Mr. Mungwarere submits that he has established a legitimate forensic purpose for obtaining access to:

- The complete transcripts of the testimony of witnesses TEN-5 and TEN-6, including the closed session portions of such testimony; and
- All exhibits tendered during the testimony of these witnesses

Ntakirutimana et al.

25. Paragraphs 752-753 of the *Ntakirutimana et al.* Trial Judgment²¹ also refer to allegations of intimidation and collusion of witnesses involving Assiel Kabera and other members of IBUKA, in order to fabricate evidence against people from Kibuye *préfecture*, emanating from the testimony of Defence witnesses 9 and 31. In particular, Defence witness 9 alleges that meetings between Mr. Kabera, Prosecution witnesses GG and FF and others were held between November 1994 and March 1995 to falsely incriminate Messrs. Ntakirutimana.

26. As previously stated, some Canadian Prosecution witnesses in Mr. Mungwarere's case are closely linked with Mr. Kabera as well as the IBUKA organization. Some have also made prior statements against Messrs. Ntakirutimana and testified in the *Ntakirutimana et al.* case. Furthermore, allegations made against Mr. Mungwarere are closely related with those of Messrs. Ntakirutimana.

27. Mr. Mungwarere submits that evidence relating to these allegations of fabrication and collusion between witnesses regarding events in Kibuye *préfecture* in the *Ntakirutimana et al.* case shares a factual nexus and is material to his case. Therefore, Mr. Mungwarere submits that he has established a legitimate forensic purpose for obtaining access to:

- The complete transcripts of the testimony of witnesses 9, 31, GG and FF, including the closed session portions of such testimony; and
- All exhibits tendered during the testimony of these witnesses

²¹ *Ntakirutimana et al.*, Trial Judgment, 21 February 2003

Nyiramasuhuko et al.

28. An entire section of the *Nyiramasuhuko et al.* Trial Judgment²² is devoted to allegations of fabrication of evidence against the Accused. More specifically, extensive evidence was presented on the role of the IBUKA organization in witness tampering and collusion to falsely incriminate accused before this Tribunal, in Rwanda and abroad.²³
29. In particular, paragraphs 334-338 refer to the recantation of Prosecution Witness QA, testifying that he lied in his prior statement and testimony before this Tribunal, concerning the allegations made against Mr. Kanyabashi, and that he had also made false accusations in the Canadian proceedings against Mr. Munyaneza. He explained that he was incited and bribed to do so by members of the IBUKA organization, and lied because, as many other Hutus, he feared being falsely accused himself if he would have refused to follow the instructions of the IBUKA administration.
30. As previously stated, some Canadian Prosecution witnesses in Mr. Mungwarere's case are closely linked the IBUKA organization. There is also evidence of systematic fabrication of allegations against him.
31. Mr. Mungwarere submits that evidence relating to these allegations of systemic fabrication of evidence, intimidation and bribing concerning members of the IBUKA organization in the *Nyiramasuhuko et al.* case shares a factual nexus and is material to his case. Therefore, Mr. Mungwarere submits that he has established a legitimate forensic purpose for obtaining access to:
- The complete transcripts of the testimony of witnesses D-2-21-T, D-2-18-O, D-13-D, D-2-13-D, D-1-4-O, D-2-16-P, AND-30, AND-41, AND-59, Charles Karemano, WMCZ, WNMN, Filip Reyntjens and QA, including the closed session portions of such testimony; and
 - All exhibits tendered during the testimony of these witnesses

²² *Nyiramasuhuko et al.*, Trial Judgment, 24 June 2011, paras 246-384

²³ See *Ibid*, paras 253-320

Ndindiliyimana et al.

32. An entire section of the *Ndindiliyimana et al.* Trial Judgment²⁴ is also devoted to allegations of systematic fabrication of evidence in Rwanda against accused before this Tribunal. More specifically, it addresses Prosecution witnesses GFA, GFR and GAP's recantations of their prior testimony in the *Ndindiliyimana et al.* case as well as other cases before this Tribunal, explaining that they lied following pressure exerted by Rwandan authorities, including prosecutors, and through the Rwandan prison system.
33. Almost all Canadian Prosecution witnesses in Mr. Mungwarere's case currently live in Rwanda and many are or have been incarcerated in Rwanda, where there is growing evidence of a well-structured system of fabrication of false testimonies and where high-ranking Rwandan authorities can exert pressure to incriminate people at will.
34. Mr. Mungwarere submits that evidence relating to these allegations of systemic fabrication of evidence, intimidation and collusion involving high-ranking officials in Rwanda and the Rwandan prison system shares a factual nexus and is material to his case. Therefore, Mr. Mungwarere submits that he has established a legitimate forensic purpose for obtaining access to:
- The complete transcripts of the testimony of witnesses GFA, GFR and GAP, including the closed session portions of such testimony; and
 - All material in the *Ndindiliyimana et al.* case relating to the recantation of GFA, GFR and GAP's testimony, including Defence Exhibits 676, 677, 678, 689A, 690A, 691A, 692A, 693A, 697, 698, 699, 700, *Karemera et al. Amicus Report*, *Ndindiliyimana et al. Final Report by Boniface Njiru Amicus Curiae* Relating to Witness GFR.

Bizimungu et al.

²⁴ *Ndindiliyimana et al.*, Trial Judgment, 17 May 2011, paras. 169-194

35. Paragraphs 108-118 of the *Bizimungu et al.* Trial Judgment²⁵ also address the issue of witness tampering, more specifically in relation to GFA's recantation of his previous testimony, as he had lied under pressure from Rwandan officials. Paragraph 109 also refers to other evidence of fabrication and witness tampering, including Decisions by the Chamber pertaining to Mugiraneza Defence allegations of contempt resulting from witness harassment.
36. As previously stated, almost all Canadian Prosecution witnesses in Mr. Mungwarere's case currently live in Rwanda and many are or have been incarcerated in Rwanda, where there is growing evidence of pressure by high-ranking Rwandan authorities to incriminate people at will in conjunction with the Rwandan genocide and generally interfere with the judicial process.
37. Mr. Mungwarere submits that evidence relating to these allegations of systemic fabrication of evidence, intimidation and collusion involving high-ranking officials in Rwanda and the Rwandan prison system shares a factual nexus with his case and is thus material to his case. Therefore, Mr. Mungwarere submits that he has established a legitimate forensic purpose for obtaining access to:
- All material in the *Bizimungu et al.* case relating to the recantation of GFA, including the *Amicus Curiae* Report.
 - All material pertaining to allegations of contempt resulting from Mugiraneza Defence witness harassment, including the Confidential *Amicus Curiae* Report and Confidential Decision on Request to Initiate Contempt Proceedings on the issue.

Ndindabahizi

²⁵ *Bizimungu et al.*, Trial Judgment, 30 September 2011

38. Finally, paragraphs 110-112 of the *Ndindabahizi* Trial Judgment²⁶ refer to allegations of fabrication of evidence and collusion in the Rwandan prison system, involving Rwandan officials.
39. As previously stated, almost all Canadian Prosecution witnesses in Mr. Mungwarere's case currently live in Rwanda and many are or have been incarcerated in Rwanda, where there is growing evidence of pressure by high-ranking Rwandan authorities to incriminate people at will in conjunction with the Rwandan genocide.
40. Mr. Mungwarere submits that evidence relating to these allegations of systemic fabrication of evidence, intimidation and collusion involving high-ranking officials in Rwanda and the Rwandan prison system shares a factual nexus and is material to his case. Therefore, Mr. Mungwarere submits that he has established a legitimate forensic purpose for obtaining access to:
- The complete transcripts of the testimony of witnesses DF and DC, including the closed session portions of such testimony; and
 - All exhibits tendered during the testimony of these witnesses
41. Moreover, Mr. Mungwarere requests access to all material related to witness tampering, intimidation, bribing, collusion, recantation and fabrication of evidence before this Tribunal.
42. Mr. Mungwarere submits that the above-listed exhibits and transcripts (collectively "Material") will materially assist his case and serves a "legitimate forensic purpose". Therefore, he is entitled to receive it pursuant to the jurisprudence of this Tribunal as well as the laws of Canada.²⁷

²⁶ *Ndindabahizi*, Trial Judgment, 15 July 2004

²⁷ See *R. v. McNeil*, [2009] 1 S.C.R. 66, para. 17 (where the Supreme Court of Canada noted that "[t]he Crown's obligation to disclose all relevant information in its possession relating to the investigation against an accused is well established. The duty is triggered upon request and does not require an application to the court. [It is] clear that relevant information in the first party production context includes not only information related to those matters the Crown intends to adduce in evidence against the accused, but also

43. Following the Karemera Decision, Mr. Mungwarere further submits that this Material is of interest to the general public, and therefore, where it is not already the case, should be filed as public documents with the redaction of information identifying protected witnesses.

Other Cases

44. Since a certain level of secrecy surrounds the various episodes of witness intimidation, tampering and recantation that have occurred at the ICTR, the Defence for Mr. Mugwarere is certain that it is extremely likely that other such episodes do indeed exist, and therefore, requests the Office of the Prosecutor and the Registrar to disclose any *Amicus Curiae* reports or the existence of any other situations where it was advised that witness intimidation, tampering or recantation occurred.
45. Indeed, the Registrar, through the Witness and Victims Security Section ("WVSS") often learns in the first instance of the existence of such situations, and the Registrar is also responsible for appointing *Amicus Curiae* when ordered to do so by the Trial Chambers of the Tribunal. Therefore, the Registrar may be in possession of material pertaining to witness intimidation, tampering and recantation that is not in the possession of the Prosecutor, in which the public may have an interest, according to the terms used in the *Karamera* decision, *supra*.

NOTICE UNDER RULE 67(D)

46. In addition, the Defence for Mr. Mungwarere would like to take this opportunity to address a related issue. As mentioned above, some of the Canadian Prosecution witnesses have previously testified before this Tribunal in some of the cases identified by the present motion, as well as in other related cases. The Defence is not aware of whether or not there is some reciprocal agreement between the PPSC and the Office of the Prosecutor in Arusha that would insure that material generated by the PPSC (or any other national authorities, for that matter), that should be disclosed to the

any information in respect of which there is a reasonable possibility that it may assist the accused in the exercise of the right to make full answer and defence.").

Defendants before this Tribunal, is communicated to the Prosecutor of this Tribunal. The Defence assumes that no such agreement exists, hence the present notice under Rule 67(D).

47. Indeed, the PPSC of Canada has disclosed to the Defence for Mr. Mungwarere material which the Defence for Mr. Mungwarere believes may fall within the purview of Rule 67(D) of the Rules, for example subsequent statements of witnesses that have testified before this Tribunal, statements of other witnesses and Gacaca material in the cases of some individuals that were convicted by this Tribunal. It is the understanding of the Defence for Mr. Mungwarere that the PPSC may also have other such material gathered in the investigation of this case that has not yet been disclosed to the Defence (as well as some other such material that may not be discloseable to Mr. Mungwarere because it is not relevant to *his* case).

48. Since this material which may be discloseable to other accused or convicted persons before this Tribunal is currently held by the PPSC and the Defence in the Mungwarere case, and is partly covered by confidentiality measures requested by the PPSC, the Defence for Mr. Mungwarere seeks advice from the Chamber that will be seized of this matter on how to proceed regarding this issue, so that the concerned accused or convicted persons before this Tribunal may have access to such material as they may be entitled to receive.

FOR ALL THE ABOVE REASONS, MAY IT PLEASE THE HONOURABLE CHAMBER TO:

GRANT the present motion

DESIGNATE a Trial Chamber to adjudicate on the present motion

ORDER the disclosure of the Material to the Defence of Jacques Mungwarere, namely:

From the *Niyitegeka* proceedings:

- The complete transcripts of the testimony of witnesses TEN-5 and TEN-6, including the closed session portions of such testimony; and
- All exhibits tendered during the testimony of these witnesses;

From the *Ntakirutimana et al.* proceedings:

- The complete transcripts of the testimony of witnesses 9, 31, GG and FF, including the closed session portions of such testimony; and
- All exhibits tendered during the testimony of these witnesses;

From the *Nyiramasuhuko et al.* proceedings:

- The complete transcripts of the testimony of witnesses D-2-21-T, D-2-18-O, D-13-D, D-2-13-D, D-1-4-O, D-2-16-P, AND-30, AND-41, AND-59, Charles Karemano, WMCZ, WNMN, Filip Reyntjens and QA, including the closed session portions of such testimony; and
- All exhibits tendered during the testimony of these witnesses.

From the *Ndindiliyimana et al.* proceedings:

- The complete transcripts of the testimony of witnesses GFA, GFR and GAP, including the closed session portions of such testimony; and
- All material in the *Ndindiliyimana et al.* case relating to the recantation of GFA, GFR and GAP testimony, including Defence Exhibits 676, 677, 678, 689A, 690A, 691A, 692A, 693A, 697, 698, 699, 700, *Karemera et al. Amicus Report*, *Ndindiliyimana et al. Final Report by Boniface Njiru Amicus Curiae Relating to Witness GFR*.

From the *Bizimungu et al.* proceedings:

- All material in the *Bizimungu et al.* case relating to the recantation of GFA, including the *Amicus Curiae Report*.

- All material pertaining to allegations of contempt resulting from Mugiraneza Defence witness harassment, including the Confidential *Amicus Curiae* Report and Confidential Decision on Request to Initiate Contempt Proceedings on the issue.

From the *Ndindabahizi* proceedings:

- The complete transcripts of the testimony of witnesses DF and DC, including the closed session portions of such testimony; and
- All exhibits tendered during the testimony of these witnesses

From the Prosecutor or the Registrar, any material related to witness tampering, intimidation, bribing, collusion, recantation and fabrication of evidence before this Tribunal.

GIVE INSTRUCTIONS to the Prosecutor of this Tribunal and the parties in the Mungwarere case to insure that the material that should be disclosed to the detainees of this Tribunal comes into possession of the Office of the Prosecutor of the ICTR.

5 March 2011



Me. Philippe Larochelle



**TRANSMISSION SHEET / FICHE DE TRANSMISSION
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I - FILING INFORMATION / INFORMATIONS GENERALES

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Date Created/ Daté du:	05/03/2012		Date transmitted/ Transmis le:	25/07/2012
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Classification Level/ Catégories de classement:	<input checked="" type="checkbox"/> Unclassified/ Non classé	<input type="checkbox"/> Strictly Confidential/ Strictement confidentiel		
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<input type="checkbox"/> Filing Party hereby submits only the original, and requests the Registry to translate/ La Partie déposante ne soumet que l'original et sollicite que le Greffe prenne en charge la traduction (Word version of the document is attached/ La version en Word se trouve en annexe)			
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