

**UNITED
NATIONS**



International Residual Mechanism
for Criminal Tribunals

No.: MICT-13-38-Misc.1

Date: 3 January 2022

Original English

:

THE SINGLE JUDGE

Before: Judge Mahandrisoa Edmond Randrianirina

Registrar: Abubacarr Tambaou

THE PROSECUTOR

v.

FELICIEN KABUGA

Public

SECOND MOTION FOR ORDER CONCERNING FROZEN BANK ACCOUNTS

The Office of the Prosecutor:

Serge Brammertz

Rupert Elderkin

Rashid S. Rashid

Counsel for Felicien Kabuga:

Emmanuel Altit

Counsel for Francois Ngirabatware

and Catherine Mukakayange

Peter Robinson

Introduction

1. Francois Ngirabatware and Catherine Mukakayange (“Applicants”) return to the Single Judge with this second motion requesting an order declaring that the United Nations International Residual Mechanism for Criminal Tribunals (“Mechanism”) and its predecessor, the International Criminal Tribunal for Rwanda (“ICTR”), no longer maintain any interest in freezing their bank accounts.

2. Both the Registrar and Prosecution have now had ample time to investigate the source of the funds in Applicants’ bank accounts. There is no evidence that Felicien Kabuga was the source of any of those funds. There is also no evidence that if the accounts were unfrozen, the funds would be used to influence witnesses or destroy evidence in the *Kabuga* trial. It is past time for the 18-year freeze on the Applicants’ accounts to be lifted.

Procedural History

3. Felicien Kabuga was first indicted by the ICTR on 30 October 1997.¹ Subsequent indictments were filed against him on 29 August 1998,² 12 October 2005,³ 14 April 2011,⁴ and 1 March 2021.⁵ He was arrested on 16 May 2020 in France.⁶ He is currently incarcerated at the United Nations Detention Unit in The Hague awaiting trial.

4. During the period when Mr. Kabuga was a fugitive, the Prosecution requested that various financial institutions and States freeze assets that it believed could be used to assist Kabuga in evading arrest. This included assets of Kabuga’s family members.

5. At that time, Francois Ngirabatware was married to one of Kabuga’s 13 children.⁷ Catherine Mukakayange is Francois Ngirabatware’s sister. At the request of the ICTR prosecutor, their bank accounts were frozen on 11 March 2003. Mr. Ngirabatware’s and Ms. Mukakayange’s efforts to obtain access to these funds through the courts in Belgium were unsuccessful because those courts ruled that the government of Belgium was obligated to cooperate with the ICTR and the ICTR Prosecutor

¹ *Prosecutor v Kabuga*, No. ICTR-97-22, *Indictment* (30 October 1997)

² *Prosecutor v Bizimana, Karemera, Nzabonimana, Rwamakuba, Ngirumpatse, Nzirorera, Kabuga, and Kajelijeli*, No. ICTR-98-44-I, *Confirmation and Disclosure of the Indictment* (29 August 1998)

³ *Prosecutor v Kabuga*, No. ICTR-98-44B-I, *Decision on the Amended Indictment* (12 October 2005)

⁴ *Prosecutor v Kabuga*, No. ICTR-98-44B-PT, *Amended Indictment* (14 April 2011)

⁵ *Prosecutor v Kabuga*, No. MICT-13-38-PT, *Prosecution’s Second Amended Indictment* (1 March 2021)

⁶ *Urgent Motion for Amendment of Order for Transfer* (20 May 2020)

⁷ They are currently divorced.

maintained that the funds should remain frozen so long as Felicien Kabuga was a fugitive.

6. On 14 April 2021, following the arrest of Felicien Kabuga, the Applicants filed their *Motion for Order Concerning Frozen Bank Accounts*. They requested that the Single Judge issue an order declaring that the Mechanism and ICTR no longer maintain any interest in freezing the Applicants' accounts, now that Felicien Kabuga was no longer a fugitive. They submitted a declaration of Francois Ngirabatware indicating that they were the holders of the accounts and that Felicien Kabuga was not the source of any of the funds in the accounts.⁸

7. On 28 April 2021, the Prosecution opposed the motion.⁹ On 3 May 2021, the Applicants filed a reply that included additional declarations of Francois Ngirabatware and Catherine Mukayayange reiterating that they were the holders of the accounts and that Felicien Kabuga was not the source of any of the funds.¹⁰ On 11 May 2021, the Prosecution filed a Sur-Reply.¹¹

8. On 9 June 2021, the Registrar filed a submission in which he requested time to determine if the Applicants' funds could be used to pay for Felicien Kabuga's assigned counsel.¹²

9. On 14 June 2021, the Applicants responded to the Registrar's submission, opposing the Registrar's request.¹³

10. On 14 October 2021, the Single Judge granted the Registrar's request, concluding that the motion was premature pending the completion of the Registrar's inquiry in respect of the legal aid granted to Kabuga.¹⁴ The Applicants regret that the Single Judge consolidated their motion along with those of the Kabuga family and requests that this Second Motion be adjudicated separately and on its own merits.

⁸ *Motion for Order Concerning Frozen Bank Accounts* (14 April 2021), Annex B.

⁹ *Prosecution Response to Motion for Order Concerning Frozen Bank Accounts* (28 April 2021)

¹⁰ *Request for Leave to Reply and Reply: Motion for Order Concerning Frozen Bank Accounts* (3 May 2021), Annexes B and C

¹¹ *Prosecution Opposition to Request for Leave to Reply: Frozen Bank Accounts Motion* (11 May 2021)

¹² *Registrar's Submission in Relation to the Motions for Orders Concerning Frozen Assets* (9 June 2021)

¹³ *Response to Registrar's Submission* (14 June 2021)

¹⁴ *Decision on Motions filed by Felicien Kabuga's Family for Return of Frozen Assets and Seized Property* (14 October 2021), p. 6

11. On 18 October 2021, counsel for the Applicants wrote to the Registrar asking him to complete his inquiry within 60 days and offering the cooperation of the Applicants.¹⁵

12. On the same day, counsel for the Applicants wrote to the Office of the Prosecutor urging that it share its information with the Registrar and that it complete its own inquiry into any claims it may have to maintain the freeze on the bank accounts within 60 days.¹⁶

13. In both letters, counsel indicated his intention to bring the matter back before the Single Judge at the end of December, 2021.

14. On 16 November 2021, counsel for the Applicants again wrote to the Registrar providing further information as to the source of the funds in the account.¹⁷ Another letter was sent to the Registrar on 18 November 2021 notifying him of a correction in the account numbers at the bank.¹⁸

15. On 22 December 2021, the bank confirmed that the accounts of the Applicants remain blocked.¹⁹

16. As of the date of this filing, neither the Registrar nor the Office of the Prosecutor has notified the Applicants of the results of its inquiries.

Argument

17. In his decision of 14 October 2021, the Single Judge gave the Registrar time to determine if the funds in the frozen accounts came from Felicien Kabuga. More than two months have passed since that decision, and six months have passed since the Registrar first requested a delay. The Registrar should now be in a position to advise the Single Judge whether it maintains that the funds must continue to be frozen and if so, on what basis.

18. The only possible legal basis for the Registrar to seize the Applicants' accounts to fund the defence of Felicien Kabuga is if the funds in those accounts are shown to constitute assets previously owned by Felicien Kabuga that he transferred to the

¹⁵ This letter is attached as Annex A.

¹⁶ This letter is attached as Annex B.

¹⁷ A redacted version of this letter is attached as Annex C. An unredacted version and the attachments will be provided to the Single Judge if needed.

¹⁸ A redacted version of this letter is attached as Annex D. An unredacted version will be provided to the Single Judge if needed.

¹⁹ The letter from the bank is attached as Confidential Annex E.

Applicants “for the purpose of sheltering or concealing those assets.”²⁰ Even then, the Registry has no power to freeze or seize those funds, but may only reduce the amount of legal aid available to Mr. Kabuga by the amounts found to have been transferred.²¹

19. There is no evidence in the record whatsoever that the funds in the frozen accounts belong to Felicien Kabuga or that he was the source of those funds. The Prosecution has bank records from those accounts in its possession,²² which the Applicants urged it to share with the Registrar. Mr. Ngirabatware has located and provided to the Registrar and Office of the Prosecution a copy of a contract for the sale of trucks that comprised a substantial part of the source of funds in his account. Neither the Registrar or the Office of the Prosecutor has contacted the Applicants and requested any further information.

20. Both Applicants have declared unequivocally, under penalty of perjury, that Felicien Kabuga was not the source of any of the funds in their accounts. Catherine Mukakayange has never met or had any contact with Felicien Kabuga. Francois Ngirabatware was married to one of Felicien Kabuga’s eight daughters until 2007. While there is evidence that Felicien Kabuga transferred his funds to his eldest son in 1994 before leaving Europe,²³ there is no evidence that he transferred any funds to any of his daughters.

21. In addition, the Registrar has ample funds from the assets seized from Felicien Kabuga and his children to fund his defence.²⁴

22. In the absence of any evidence that the funds in the frozen accounts belong or came from Felicien Kabuga, and in light of the affirmative evidence from the Applicants that they did not, as well as the lack of any provision authorising the Registrar to freeze or seize funds from a third party, there is no continuing basis upon which the accounts should be frozen for possible use by the Registrar to fund Felicien Kabuga’s defence.

²⁰ *Guidelines for Determining the Extent to Which an Applicant for Legal Aid is Able to Remunerate Counsel* (13 November 2017), para. 8 The Guidelines can be found at <https://www.irmct.org/sites/default/files/documents/171113-indigency-guidelines-190104.pdf>

²¹ *Guidelines*, para. 16

²² *Prosecution Opposition to Request for Leave to Reply: Frozen Bank Accounts Motion* (11 May 2011), Annexes 2 and 3

²³ *Prosecutor v Kabuga*, No. IT-13-38-Misc.2, *Request for Leave to Reply and Reply: Motion for Order Concerning Frozen Assets* (4 May 2021), Annexes A and D

²⁴ *Prosecutor v Kabuga*, No. IT-13-38-Misc.2, *Response to Registrar’s Submissions* (23 June 2021), Annex B

23. Likewise, the only basis upon which the Office of the Prosecutor is able to maintain a freeze on the accounts following the arrest of Felicien Kabuga is to produce evidence that the funds in the accounts would be used to injure or intimidate a victim or witness or to destroy evidence in the *Kabuga* case.²⁵ The Prosecution has produced no evidence whatsoever, and not even evidence of a current relationship between Felicien Kabuga and the Applicants.

24. Therefore, the Office of the Prosecutor should now be in a position to advise the Single Judge whether it maintains that the funds must continue to be frozen, and, if so, on what basis.

25. Finally, in his decision, the Single Judge indicated that the Applicants had not shown that the frozen accounts remained unavailable to them.²⁶ Mr. Ngirabatware subsequently went to the bank in person and obtained confirmation that the accounts of he and his sister remain blocked.²⁷

26. The Single Judge indicated that his decision was without prejudice to any subsequent requests by the Applicants.²⁸ This is that subsequent request.

Conclusion

27. The Registrar and Office of the Prosecutor have now had ample time to determine whether the funds in the frozen accounts belong to or derived from Felicien Kabuga or would be used to injure or intimidate a victim or witness or to destroy evidence in the *Kabuga* case. In the absence of evidence supporting the continued freezing of the accounts, the Single Judge is respectfully requested to issue an order declaring that the United Nations International Residual Mechanism for Criminal Tribunals (“Mechanism”) and its predecessor, the International Criminal Tribunal for Rwanda (“ICTR”), no longer maintain any interest in freezing the accounts of Francois Ngirabatware and Catherine Mukakayange, and to direct the Registrar to serve that order on the bank and the government of Belgium.²⁹

²⁵ Rule 37(A)(iii)

²⁶ *Decision on Motions filed by Felicien Kabuga’s Family for Return of Frozen Assets and Seized Property* (14 October 2021), p. 6

²⁷ Confidential Annex E

²⁸ *Decision on Motions filed by Felicien Kabuga’s Family for Return of Frozen Assets and Seized Property* (14 October 2021), p. 6

²⁹ The Applicants listed the wrong account number for Catherine Mukakayange in their original motion and apologise to the Single Judge for any confusion that resulted from that error. The order need not specify

28. The Applicants have been deprived of their funds for too long. It is time that their funds be returned to them.

Word count: 2026

Respectfully submitted,

A handwritten signature in black ink, reading "Peter Robinson". The signature is written in a cursive style with large, overlapping loops for the letters.

PETER ROBINSON

Counsel for Francois Ngirabatware
and Catherine Mukakayange

the account numbers, as the bank has advised that the accounts have now been transferred to its Service Recovery Department. File F106442 should be referenced. (See Confidential Annex E)

ANNEX A

PETER ROBINSON
Defence Counsel
International Residual Mechanism
for Criminal Tribunals
Churchillplein 1
2517JW The Hague
Netherlands
E-mail: peter@peterrobinson.com

18 October 2021

Mr. Abubacarr Tambadou, Registrar
International Residual Mechanism
for Criminal Tribunals
Churchillplein 1
2516JW The Hague
The Netherlands

Re: *Prosecutor v Felicien Kabuga*
Application of Francois Ngirabatware and Catherine Mukakayange
No. MICT-13-38-Misc.1

Dear Mr. Tambadou,

I hope that this letter finds you doing well.

I am writing to you in my capacity as counsel for Francois Ngirabatware and Catherine Mukakayange, whose accounts at the BNP Fortis Bank have been frozen by the Mechanism. I hope that you can help end a long nightmare for my clients, who have been deprived of their funds for too, too long.

I know that you are a fair person and have no hesitation in calling out injustice. I would like for us to work together cooperatively so that you can get to the bottom of this issue without further delay.

I would like to emphasise at the outset that the case of these Applicants is separate and vastly different from the case brought by the children of Felicien Kabuga (Misc.2), wherein it is acknowledged that Felicien Kabuga was the source of the frozen funds. Here, Felicien Kabuga had nothing to do with the funds. The only connection with Felicien Kabuga is that one of the applicants, Francois Ngirabatware, was married to one of Felicien Kabuga's 13 children—a marriage that ended 14 years ago. It was very unfortunate that the Single Judge combined this case with those of the children of Felicien Kabuga in his decision.

Mr. Abubacarr Tambadou

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In his *Decision Relative aux Requetes Deposees par la Famille de Felicien Kabuga concernant la Restitution d'Avoirs Geles et Biens Saisis* (14 October 2021), the Single Judge declined to order that the accounts be unfrozen at this time. He decided to give the Registrar the opportunity to determine whether the funds in that account were transferred by Felicien Kabuga or otherwise are assets owned by him.

I hope that this determination can be made without waiting for an overall investigation into all of Felicien Kabuga's assets to be completed--a process that has taken years in the *Karadzic* and *Praljak* cases.

Under your *Guidelines for Determining the Extent to Which an Applicant for Legal Aid is Able to Remunerate Counsel* (13 November 2017) ("Guidelines"), the only basis for the Registrar to deprive Mr. Ngirabatware and Ms. Mukakayange of the funds in their accounts would be if those funds had been transferred from Felicien Kabuga with the intent to conceal them from the ICTR. The truth is that Felicien Kabuga was not the source of those funds. I am ready to deploy all means to help you reach that conclusion.

I have written a letter today asking the Office of the Prosecutor to make available to you all the information you may need to determine whether the funds in the frozen accounts were transferred from Felicien Kabuga. In addition, I wanted to write to you directly and inform you that Mr. Ngirabatware and Ms. Mukakayange are willing to provide you with any information you require that may bear on this issue.

It should be relatively easy for you to make the determination whether evidence exists that would allow you to attribute these funds to Mr. Kabuga for the purpose of requiring that they be used for his Legal Aid. The Prosecution has presented no evidence of this, despite their possession of bank records from the accounts, and the Applicants have adamantly insisted, in statements under penalty of perjury, that the funds had nothing to do with Felicien Kabuga. As stated above, they are prepared to fully cooperate with the Registrar's inquiry.

Because this is a very simple and straightforward issue, and one in which we are prepared to fully assist you in resolving, we hope that you can complete whatever inquiries that need to be made and be in a position to decide if you will seek to attribute these funds to Felicien Kabuga under the *Guidelines* in the next 60 days.

We intend to file a motion on 20 December 2021 to unfreeze these accounts once and for all and would hope that you will be in a position to agree at that time that there is no basis upon which the funds could be used for Felicien Kabuga's Legal Aid

If your office wishes to continue the freeze on the accounts pursuant beyond that time, we will expect you to be in a position to provide the Single Judge with facts from which he can exercise judicial review of your decision.

Mr. Abubacarr Tambadou
--page three—

Thank you for your consideration of this request. Please don't hesitate to call upon me if I can provide you with any further information. With a little digging, I think you will find that this is a clear-cut case and one in which we should be able to combine our efforts for a just result.

Respectfully submitted,

A handwritten signature in black ink that reads "Peter Robinson". The signature is written in a cursive, flowing style with large, rounded letters.

PETER ROBINSON

Counsel for Francois Ngirabatware
and Catherine Mukakayange

ANNEX B

PETER ROBINSON
Defence Counsel
Mechanism for
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E-mail: peter@peterrobinson.com

18 October 2021

Mr. Rupert Elderkin
Office of the Prosecutor
United Nations International Residual
Mechanism for Criminal Tribunals
Arusha, Tanzania

Re: *Prosecutor v Felicien Kabuga*
Application of Francois Ngirabatware and Catherine Mukakayange
No. MICT-13-38-Misc.1

Dear Rupert,

I hope you are doing well in Arusha.

I am writing to you in my capacity as counsel for Francois Ngirabatware and Catherine Mukakayange, whose accounts at the BNP Fortis Bank have been frozen based upon a request by the Office of the Prosecutor.

I would like to emphasise at the outset that the case of these applicants is separate and vastly different from the case brought by the children of Felicien Kabuga (Misc.2), wherein it is acknowledged that Felicien Kabuga was the source of the frozen funds. Here, Felicien Kabuga had nothing to do with the funds. The only connection with Felicien Kabuga is that one of the applicants, Francois Ngirabatware, was married to one of Felicien Kabuga's 13 children—a marriage that ended 14 years ago. It was very unfortunate that the Single Judge combined this case with those of the children of Felicien Kabuga in his decision.

In his *Decision Relative aux Requetes Deposees par la Famille de Felicien Kabuga concernant la Restitution d'Avoirs Geles et Biens Saisis* (14 October 2021), the Single Judge declined to order that the accounts be unfrozen at this time. He decided to give the Registrar the opportunity to determine whether the funds in that account were transferred by Felicien Kabuga or otherwise are assets owned by him.

Mr. Rupert Elderkin

--page two--

I am requesting, on behalf of Mr. Ngirabatware and Ms. Mukakayange, that your office cooperate with the Registrar's investigation by sharing with them all bank records and other information gathered by the Office of the Prosecutor that would bear on the source of the funds in those accounts. My clients are adamant that Felicien Kabuga was not the source of those funds. Every delay in adjudicating their right to their own funds really hurts them. They have suffered great hardship over the years from being deprived of their funds.

In his decision, the Single Judge also noted that the Office of the Prosecutor should also have the opportunity to determine whether grounds exist under Rule 37 of the Mechanism's Rules of Procedure and Evidence (Rule 40 at the ICTR), following the arrest of Felicien Kabuga, to believe that the funds, if returned to the Applicants, would be used to injure or intimidate of a victim or witness, or to destroy evidence in Felicien Kabuga's case.

On behalf of my clients, I am hereby requesting that the Office of the Prosecutor conduct whatever inquiries are necessary to determine whether there are any grounds to believe that the funds, if returned to the Applicants, would be used to injure or intimidate a victim or witness, or to destroy evidence in Felicien Kabuga's case. My clients have had no contact with Felicien Kabuga for many years and have no interest whatsoever in his criminal case. They are willing to provide you with any information you require that may bear on this issue and execute any undertakings you may require concerning the use of the funds.

Because this is a very simple and straightforward issue, and one in which we are prepared to fully assist you in resolving, I expect that you can complete whatever inquiries that need to be made and be in a position to decide on our request to lift the asset freeze pursuant to Rule 37 within 60 days.

I intend to file a motion on 20 December 2021 to unfreeze these accounts once and for all. I hope that you will be in a position to agree at that time that there is no evidence that the funds, if returned to the Applicants, would be used to injure or intimidate of a victim or witness, or to destroy evidence in Felicien Kabuga's case, and therefore no grounds exist under Rule 37 to prevent them from having access to their funds.

If your office wishes to continue to seek to freeze the accounts pursuant to Rule 37 at that time, I will expect you to be in a position to provide the Single Judge with facts from which he can exercise judicial review of that decision.

Mr. Rupert Elderkin
--page three--

Thank you very much for your consideration of this request. Please feel free to contact me if we can provide you with any further information.

Respectfully submitted,

A handwritten signature in black ink that reads "Peter Robinson". The signature is written in a cursive style with large, rounded letters.

PETER ROBINSON
Counsel for Francois Ngirabatware
and Catherine Mukakayange

cc: Registrar

ANNEX C

PETER ROBINSON
Defence Counsel
International Residual Mechanism
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16 November 2021

Mr. Abubacarr Tambadou, Registrar
International Residual Mechanism
for Criminal Tribunals
Churchillplein 1
2516JW The Hague
The Netherlands

Re: *Prosecutor v Felicien Kabuga*
Application of Francois Ngirabatware and Catherine Mukakayange
No. MICT-13-38-Misc.1

Dear Mr. Tambadou,

Following up on my letter of 18 October 2021, I am enclosing two documents which my client, Francois Ngirabatware, has located that bear on the source of the funds in one of his and his sister's frozen bank accounts.

The first document is an agreement dated 3 July 2000 wherein Mr. Ngirabatware sold ten trucks and trailers to Constantin Ndikumana in Nairobi, Kenya for \$1.2 million dollars. The agreement provided for payments of \$140,000 per quarter, or \$46,666 per month to be made to Mr. Ngirabatware's bank account in Kenya or into account [REDACTED] at [REDACTED] Bank in Belgium. This is one of the frozen accounts.

The second document is a standing order form dated 3 July 2000 for transmission of the first \$140,000 payment to the account at the [REDACTED] Bank.

Mr. Ngirabatware tells me that the buyer subsequently made additional periodic payments, most of which went into the frozen account, and that this transaction is the main source of the funds that are currently frozen in that account.

As he has stated previously, none of the funds came from Felicien Kabuga. Mr. Kabuga had nothing to do with the transaction that is the subject of the enclosed documents. You can feel free to verify this with the buyer.

Mr. Abubacarr Tambadou
--page two—

I hope that this information will assist you in rapidly concluding that there is no basis whatsoever to continue to freeze Mr. Ngirabatware or his sister's accounts to fund Mr. Kabuga's legal aid.

As I indicated in my letter of 18 October, we are expecting you to be able to be in a position to advise the Single Judge of the results of your investigation by 20 December 2021. If we can assist you with any further information, please feel free to contact me.

Respectfully submitted,

A handwritten signature in black ink that reads "Peter Robinson". The signature is written in a cursive, flowing style with large, rounded letters.

PETER ROBINSON

Counsel for Francois Ngirabatware
and Catherine Mukakayange

cc: Rupert Elderkin, OTP

ANNEX D

PETER ROBINSON
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International Residual Mechanism
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18 November 2021

Mr. Abubacarr Tambadou, Registrar
International Residual Mechanism
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Churchillplein 1
2516JW The Hague
The Netherlands

Re: *Prosecutor v Felicien Kabuga*
Application of Francois Ngirabatware and Catherine Mukakayange
No. MICT-13-38-Misc.1

Dear Mr. Tambadou,

After providing you the documents pertaining to the sale of Francois Ngirabatware's trucks on Tuesday, I noticed an error in the account numbers that I have previously provided for my clients Francois Ngirabatware and Catherine Mukayayange.

The account numbers at [REDACTED] Bank for Francois Ngirabatware are # [REDACTED]-51 and [REDACTED]-56. The account number for Catherine Mukayayange is [REDACTED]-84.

I apologize for any inconvenience that this error may have caused you or the Office of the Prosecutor. I will correct the error with the Single Judge when making my next filing.

Mr. Abubacarr Tambadou
--page two--

Please feel free to contact me if you have any questions.

Respectfully submitted,

A handwritten signature in black ink, reading "Peter Robinson". The signature is written in a cursive style with large, rounded letters.

PETER ROBINSON

Counsel for Francois Ngirabatware
and Catherine Mukakayange

cc: Rupert Elderkin, OTP



I - FILING INFORMATION / INFORMATIONS GÉNÉRALES

To/ À :	IRMCT Registry/ <i>Greffe du MIFRTP</i>	<input checked="" type="checkbox"/> Arusha/ <i>Arusha</i>	<input type="checkbox"/> The Hague/ <i>La Haye</i>
From/ De :	<input type="checkbox"/> Chambers/ <i>Chambre</i>	<input type="checkbox"/> Defence/ <i>Défense</i>	<input type="checkbox"/> Prosecution/ <i>Bureau du Procureur</i>
		<input checked="" type="checkbox"/> Other/ <i>Autre</i> :	Applicants
Case Name/ Affaire :	Prosecutor v Kabuga	Case Number/ Affaire n° :	MICT-13-38-Misc.1
Date Created/ Daté du :	3 January 2022	Date transmitted/ Transmis le :	3 January 2021
		No. of Pages/ Nombre de pages :	21
Original Language / Langue de l'original :	<input checked="" type="checkbox"/> English/ <i>Anglais</i>	<input type="checkbox"/> French/ <i>Français</i>	<input type="checkbox"/> Other/ <i>Autre</i> (specify/préciser) :
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Title of Document/ Titre du document :	MOTION FOR ORDER CONCERNING FROZEN BANK ACCOUNTS		
Classification Level/ Catégories de classification :	<input checked="" type="checkbox"/> Unclassified/ <i>Non classifié</i>	<input type="checkbox"/> Ex Parte Defence excluded/ <i>Défense exclue</i>	<input type="checkbox"/> Ex Parte Prosecution excluded/ <i>Bureau du Procureur exclu</i>
	<input type="checkbox"/> Confidential/ <i>Confidentiel</i>	<input type="checkbox"/> Ex Parte R86(H) applicant excluded/ <i>Art. 86 H) requérant exclu</i>	<input type="checkbox"/> Ex Parte Amicus Curiae excluded/ <i>Amicus curiae exclu</i>
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<input type="checkbox"/> Decision/ <i>Décision</i>	<input type="checkbox"/> Submission from parties/ <i>Écritures déposées par des parties</i>	<input type="checkbox"/> Affidavit/ <i>Déclaration sous serment</i>	<input type="checkbox"/> Notice of Appeal/ <i>Acte d'appel</i>
<input type="checkbox"/> Order/ <i>Ordonnance</i>	<input type="checkbox"/> Submission from non-parties/ <i>Écritures déposées par des tiers</i>	<input type="checkbox"/> Indictment/ <i>Acte d'accusation</i>	

II - TRANSLATION STATUS ON THE FILING DATE/ ÉTAT DE LA TRADUCTION AU JOUR DU DÉPÔT

<input type="checkbox"/> Translation not required/ <i>La traduction n'est pas requise</i>
<input checked="" type="checkbox"/> Filing Party hereby submits only the original, and requests the Registry to translate/ <i>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 Word est jointe)</i>
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