

In: KSC-BC-2020-06

**The Specialist Prosecutor v. Hashim Thaçi, Kadri Veseli,
Rexhep Selimi and Jakup Krasniqi**

Before: Trial Panel II

Judge Charles L. Smith III, Presiding Judge
Judge Christoph Barthe,
Judge Guénaél Mettraux
Judge Fergal Gaynor, Reserve Judge

Registrar: Dr Fidelma Donlon

Filing Participant: Counsel for Hashim Thaçi
Counsel for Kadri Veseli
Counsel for Rexhep Selimi
Counsel for Jakup Krasniqi

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**Public Redacted Version of Joint Defence Response to the Prosecution motion
for admission of evidence of Witnesses W00208, W02082, W02475, W04147,
W04325, W04491, and W04753 pursuant to Rule 154 (F01818)**

Specialist Prosecutor

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I. INTRODUCTION

1. The Defence for Messrs Thaçi, Veseli, Selimi, and Krasniqi (collectively, “the Defence”) hereby files its response to the Prosecution motion for admission of evidence of Witnesses W00208, W02082, W02475, W04147, W04325, W04491, and W04753 pursuant to Rule 154 (“the Motion”).¹
2. The SPO seeks admission pursuant to Rule 154 of the prior statements and associated exhibits of seven witnesses. The Defence hereby objects to the parts of the material tendered through Rule 154 on the grounds that the SPO has failed to substantiate its relevance; (ii) the documents tendered as associated exhibits do not constitute an indispensable or inseparable part of the statements to which they relate; and (iii) their probative value is outweighed by their prejudicial effect and (iv) the time-saving function of admission pursuant to Rule 154 is overshadowed by the lengthy *viva voce* testimony sought by the SPO.
3. Finally, some of the evidence sought to be tendered concerns matters of pivotal importance to the Defence case the admission of which would prove highly prejudicial for the rights of the Accused.

II. SUBMISSIONS

A. W00208

4. W00208 provides evidence concerning alleged crimes in [REDACTED] in [REDACTED] 1999, including the disappearance of his [REDACTED]. The SPO seeks admission of 3 statements/interviews of W00208.²

¹ KSC-BC-2020-06/F01788, Prosecution motion for admission of evidence of Witnesses W00208, W02082, W02475, W04147, W04325, W04491, and W04753 pursuant to Rule 154 with confidential Annexes 1-7, 14 September 2023.

² 007631-TR-ET Part 1-2 RED2; 007631-TR-ET Part 2 RED2; 007631-TR-ET Part 3; 007631-TRET Part 4;

5. The Defence submits that tendering W00208's six parts of the witness's [REDACTED] interview, his [REDACTED] witness statement, as well as his testimony before the [REDACTED], which amounts to over 100 pages of potential evidence does not advance the goal of trial efficiency. It is unclear why any one of these documents alone would not suffice to succinctly convey the evidence the SPO seeks to move into the record.
6. By tendering all three different interviews into evidence via Rule 154, the SPO is contributing to a badly bloated trial record, requiring the Panel, Parties and Participants to review three repetitive interviews to identify the genuinely relevant parts. In so doing, it directly undermines the efficiency gains Rule 154 was designed to accomplish.
7. W00208 provides evidence concerning a discrete allegation. As such, there is no reason why the Rule 154 statement associated with this witness cannot be reduced to a clearer and more succinct statement. Simply because Rule 154 allows for an entire transcript to be placed onto the record, it does not follow that this should be the standard practice. The trial record will benefit greatly from requiring the SPO to take a more disciplined approach. Absent clear reasons for including an entire SPO interview, the Defence requests that the Trial Panel direct the SPO to generate or select a statement(s) that appropriately summarize the key evidence the SPO seeks to elicit from a witness in a more concise and direct format than the current submission. Alternatively, the Defence requests the Panel to admit only though Rule 154 the witness' SITF interview, which is the most exhaustive.

007631-TR-ET Part 5 RED; 007631-TR-ET Part 6; U000-0009-U000-0016 RED2 (and their corresponding Albanian and Serbian translations); 007623-007630 RED2 (007627-007630).

B. W02082

8. W02082's Rule 154 statement relates to allegations of mistreatment in [REDACTED] in [REDACTED] and [REDACTED] 1999. The Defence has no objection to the witness's Rule 154 statement³. The Defence does take issue with one of the associated exhibits linked to this statement,⁴ which is an extract of one of the associated exhibits tendered for [REDACTED]⁵, with the grounds for its non-admission elaborated on below.

C. W02475

9. W02475 is intended to give evidence on human rights abuses of [REDACTED] in Kosovo in [REDACTED] 1999 which [REDACTED].

10. The Defence does not oppose the admission of W02475's Rule 154 Statement but does take issue with several specific sections which the Defence submits constitute inadmissible opinion evidence.⁶ The Defence notes that W02475 is not being called as an expert witness and his evidence therefore must be based upon what he witnessed. The Defence requests that the first two sentences of paragraph 38 as well as the last sentence of that paragraph fall within that category and should be redacted before the document is moved into evidence.

1. Associated Exhibits

11. The SPO seeks to tender seven documents as associated exhibits. However, only the [REDACTED]⁷ form an inseparable and indispensable part of

³ 069393- TR Part 1 Revised-ET RED; 069393- TR Part 2 Revised-ET RED; 069393-TR Part 3 Revised-ET Revised RED

⁴ [REDACTED].

⁵ [REDACTED]

⁶ 034032-034057 RED3.

⁷ SITF00265720-00265827 RED3; SITF00265828-00265846.

W02475's statement⁸ as the facts to which the witness will testify directly derive from such [REDACTED]. With regards to the remainder of the exhibits, the SPO often confuses a description of the contents of the exhibits with their purported relevance.

a. 024835-024843

12. The SPO claims that this article is [REDACTED] and provides an overview of the abuses discussed [REDACTED] as well as other members of [REDACTED] in [REDACTED] 1999. It is noted that only the cases relevant to [REDACTED] as a location were discussed and the witness often referred back to [REDACTED].⁹ It is clear that [REDACTED] constitute the basis for his knowledge and that articles such as this one were merely used as tools [REDACTED].

b. 024844-024865

13. One of the documents being tendered contains extracts from [REDACTED].¹⁰ As will be detailed below, the contents of this document are largely duplicative or not discussed in detail in the witness statement.

14. Pages 024845-024854 of this document contain excerpts of [REDACTED]. Indications of authorship in the document are absent although the witness has clarified that only [REDACTED]. There is little to no information regarding the methodology used [REDACTED]. [REDACTED]."¹¹ The Defence notes that in his [REDACTED] statement, the witness states with

⁸ KSC-BC-2020-06/F01380, Decision on Admission of Evidence of First Twelve SPO Witnesses pursuant to Rule 154, 16 March 2023, para. 24

⁹ 034032-034057 RED3, paras 39, 41.

¹⁰ 024844-024865.

¹¹ *Ibid*, p. 024845.

regards to [REDACTED] that “[REDACTED]”. It follows that these extracts are duplicative [REDACTED]¹² [REDACTED].

15. Pages 0243855-024859 contain an article titled [REDACTED]. This article was not discussed with the witness during the statements nor does the witness make any references to the author.

16. Pages 024860-024862 contain an [REDACTED] which bears no indicia of individual authorship. According to the witness, this letter was based on the information [REDACTED].

17. Pages 024863-024865 contain a [REDACTED],¹³ independently from [REDACTED]. The [REDACTED] on pages 024863-024864 consists of observations [REDACTED], bearing no link to the witness’ evidence which focuses on [REDACTED].

c. 023795-023808, [REDACTED] and [REDACTED]

18. These documents are all articles [REDACTED].¹⁴ These articles retell the same stories [REDACTED].

19. The Defence notes that two of these documents¹⁵ were cited in the SPO Pre-Trial Brief to support the allegation that “[REDACTED]”.¹⁶ However, these documents provide nothing more than generalized evidence of crimes being committed [REDACTED], without any of the specificities suggested by the allegation. Considering that the Articles were not specifically and substantially discussed during the statement as well as the duplicative nature

¹² SITF00265720-00265827 RED3; SITF00265828-00265846.

¹³ 034032-034057 RED3, para. 83.

¹⁴ 023795-023808.

¹⁵ [REDACTED].

¹⁶ [REDACTED].

of the facts contained therein, their admission would overwhelm the trial record with material of marginal probative relevance.

20. In light of the above, the documents tendered by the SPO are not suitable for admission as associated exhibits pursuant to Rule 154. The Defence therefore objects to their admission.

D. W04147

1. Rule 154 Statement

21. W04147 was the [REDACTED]. He is a key witness whose evidence should be heard *viva voce*, in light of his personal interactions with the Accused and alleged JCE members, Serbian military and political leaders, alleged victims and/or prosecution witnesses. W04147 is the first [REDACTED] likely to testify in the case, with an insider knowledge of the relevant players at the time; while the principle of orality may not be absolute, in the instant case, there is clearly an overriding public interest in the evidence in question being presented orally,¹⁷ especially in light of the extensive involvement [REDACTED] in the 1998/1999 conflict in Kosovo. W04147's significance for the Defence is further illustrated by [REDACTED].

22. In consequence, the Defence particularly objects to the admission through Rule 154 of the excerpts of his SPO statement¹⁸ which go to the acts and conduct of the Accused and/or relate to the alleged organisation of the KLA and crimes allegedly committed by the KLA, [REDACTED]. These issues go to the heart of the prosecution case and should be heard live.

23. That Rule 154 is inappropriate for this witness is further demonstrated by the fact that, while the SPO seeks admission of the thirty pages statement of the

¹⁷ See KSC-BC-2020-06/F01380, para. 18.

¹⁸ 075522-075551.

witness and twenty-one associated exhibits, it still intends to spend three hours examining the witness live and to use eighty exhibits in direct examination.¹⁹ Thus, it does not appear that there would be any significant time saving through the admission in writing of W04147's prior evidence.

2. Associated Exhibits

24. If the Panel were to find W04147's SPO statement admissible, the Defence submits the following objections to the proposed Associated Exhibits.

a. [REDACTED]²⁰

25. [REDACTED] do not form an inseparable part of W04147's SPO statement. The witness merely confirms that he has reviewed [REDACTED] during his SPO interview, [REDACTED].²¹ He is not asked to comment any of them in his statement with regard to particular individuals or incidents, [REDACTED]. 075369-075377 was used to refresh W04147's memory regarding the [REDACTED]; yet, this [REDACTED] does not form an inseparable part of his statement since the witness merely confirmed that the [REDACTED] without providing any additional information.²² Similarly, 075395-075402, [REDACTED], does not form an inseparable part of W04147's statement, since the witness confirmed only one sentence [REDACTED], the fact that [REDACTED].²³

26. In addition, without clear authorship, the [REDACTED] prejudicial effect outweighs their probative value, if any. Most [REDACTED] do not identify

¹⁹ KSC-BC-2020-06/F01811/A01, Annex 1 to Prosecution submission of list of reserve witnesses, pp. 36-75.

²⁰ 075300-075308, 075382-075387, 075316-075335, 075378-075381, 075309-075315, 075349-075360, 075392-075394, 075336-075348, 075413-075414, 075409-075412, 075361-075368, 075369-075377, 075388-075391, 075395-075402, 075403-075408.

²¹ 075522-075551, para. 18.

²² *Ibid*, para. 137.

²³ *Ibid*, para. 59.

their author, but merely state that they emanate from “[REDACTED]”²⁴ “[REDACTED]”²⁵ or “[REDACTED]”.²⁶ W04147 acknowledges that [REDACTED],²⁷ which puts in question their reliability. Most [REDACTED] rely on [REDACTED].²⁸ Even when [REDACTED], [REDACTED].²⁹ Some [REDACTED] rely, *inter alia*, on “[REDACTED] officials”,³⁰ without further precision, while [REDACTED], as [REDACTED], was not neutral and may have had an interest in misleading the [REDACTED] and portraying the [REDACTED] in a bad light.

27. This lack of clarity concerning the authorship and source of information of [REDACTED] is particularly prejudicial for the Defence, since they [REDACTED].³¹

28. Furthermore, most of these [REDACTED] remain partly redacted, including regarding significant information, [REDACTED], which is prejudicial for the Defence. In particular, [REDACTED] is often redacted,³² as well as the identity of [REDACTED].³³ Their probative value is thus outweighed by their prejudicial effect.

29. If the SPO considers that these [REDACTED] are relevant, it should put them to W04147 in direct examination in order to clarify [REDACTED].

²⁴ 075413-075414, 075409-075412, 075395-075402.

²⁵ 075361-075368, 075369-075377, 075388-075391, 075403-075408.

²⁶ 075336-075348, p. 075336.

²⁷ *Ibid.*

²⁸ [REDACTED].

²⁹ See for instance [REDACTED]. Similarly, 075395-075402 reports a [REDACTED].

³⁰ See for instance 075316-075335, p. 075316.

³¹ [REDACTED].

³² [REDACTED].

³³ 075361-075368, pp. 075364-075365.

30. Last, the relevance of several [REDACTED], which do not refer to any incident charged in the Indictment, is unclear.³⁴

b. [REDACTED] reports

31. The Defence questions the probative value of 074581-074581 and 074583-074584 since W04147 disagreed with their content, *i.e.* he maintained that [REDACTED] was not [REDACTED] while the two [REDACTED] reports portrayed [REDACTED].³⁵

32. Similarly, concerning 074582-074582, W04147 expressed a different opinion about the [REDACTED]. Therefore, this [REDACTED] report's probative value is, at most, limited.

33. The Defence invites the Panel to take into account these observations when ruling on the admissibility of these items.

c. Excerpts from [REDACTED]

34. [REDACTED] is a 52 pages document, which is, for the most part, illegible and contains numerous redactions. In this context, the Defence requests the Panel to admit through Rule 154 only the few pages discussed by the witness in his SPO statement,³⁶ whose meaning was clarified by the witness.

d. [REDACTED]

35. [REDACTED]. It is unclear how [REDACTED] was compiled. While [REDACTED] involving W04147 is commented in his statement and is admissible pursuant to Rule 154, the [REDACTED] are not commented by W04147, do not form an inseparable part of his statement and are thus not

³⁴ 075378-075381; 075349-075360; 075403-075408.

³⁵ 075522-075551, para. 43.

³⁶ *Ibid*, paras 50, 52, 69-75, 86, 106, 118, 122, 126, 128, 138.

admissible through Rule 154. The Defence does not object to the admission through Rule 154 of the [REDACTED].

3. Status as reserve witness

36. Last, the Defence strongly objects to W04147 being called as a reserve witness.³⁷ First, given W04147's [REDACTED] at the time, the number of core issues covered by his statement and expected testimony,³⁸ and the number of proposed exhibits to be used with the witness -not less than 80³⁹-, the Defence will require advance notice of his appearance in order to have adequate time for its preparation. Second, W04147's testimony will result in a lengthy cross-examination, that may extend into any scheduled break. Third, the SPO has applied for Rule 107 measures for this witness, such as the presence of a [REDACTED] representative during his testimony,⁴⁰ and the Defence has stressed that it intends to contact the [REDACTED] authorities to obtain leave to cross-examine the witness on matters which go beyond his proposed Rule 154 statement, if need be.⁴¹ In these circumstances, it would be wholly inappropriate to call W04147 as reserve witness; his appearance should be scheduled with sufficient prior notice and foreseeability in order to ensure adequate time for the Defence preparation and accommodation for the Rule 107 measures, if granted by the Panel.

E. W04325

37. W04325 was the [REDACTED] in [REDACTED].

³⁷ KSC-BC-2020-06/F01788, para. 1; KSC-BC-2020-06/F01811, Prosecution submission of list of reserve witnesses.

³⁸ KSC-BC-2020-06/F01811/A01, Annex 1 to Prosecution submission of list of reserve witnesses, pp. 34-35.

³⁹ *Ibid*, pp. 36-75.

⁴⁰ KSC-BC-2020-06/F01764, Prosecution request for Rule 107 measures for W04147 and W04868, para. 7.

⁴¹ KSC-BC-2020-06/F01799, Thaçi, Selimi and Krasniqi Defence Response to 'Prosecution request for Rule 107 measures for W04147 and W04868' (F01764), para. 22.

1. Rule 154 Statement

38. The Defence notes that the SPO asks leave to tender through Rule 154 both W04325's SPO statement dated [REDACTED], and two [REDACTED] notes dated [REDACTED] and [REDACTED]. The Defence objects to the admissibility of selected paragraphs of W04325's SPO statement in light of their prejudicial effect as well as to the two [REDACTED] notes in light of their low probative value and reliability.

39. In its Motion, the SPO states that W04325 will describe what he saw and learned at each of those locations, including of [REDACTED], and will identify KLA commanders, including those [REDACTED].⁴² This fact is used by the SPO to suggest the presence of the Accused at crime sites such as [REDACTED], [REDACTED], [REDACTED], and [REDACTED], which it argues is relevant to the charges in the indictment.⁴³

40. The Panel has held that the importance of the proposed evidence to a Party's case is a factor that the Panel may take into consideration and that it may refuse admission pursuant to Rule 154 of a statement that is central to a party's case, ordering that evidence to be heard *viva voce*.⁴⁴

41. W04325 alleges that [REDACTED] was present at [REDACTED] on various occasions, that he was the commander in [REDACTED], and that he gave orders to [REDACTED]. Such allegations go to the heart of the case, i.e. elements of command responsibility and joint criminal enterprise, and are not tenuous or remotely connected to the charges in the indictment. This is evident from the manner in which the SPO has summarized the witness' evidence by implicitly alleging the knowledge of the Accused of crimes

⁴² Motion, para.39.

⁴³ *Ibid*, para. 43.

⁴⁴ KSC-BC-2020-06/F01380, Decision on Admission of Evidence of First Twelve SPO Witnesses Pursuant to Rule 154, 16 March 2023, para. 28.

committed at those sites. The SPO has cited these paragraphs in its Pre-Trial Brief to support the allegation that [REDACTED]⁴⁵ which supports the Defence's position that these allegations go to proof the acts and conduct of the Accused and are pivotal to the Defence case. As such, this evidence ought to be heard *viva voce*.

42. W04325 clarified, in his SPO statement, that he minimized his connection with the KLA when making the [REDACTED] statement, because he was worried that they would prosecute him if he stated anything about him [REDACTED], and he gave several examples of misleading statements or inaccuracies to the SPO.⁴⁶ Therefore, his [REDACTED] statement cannot be admitted for the truth of its content. In addition, the [REDACTED] statement lacks *prima facie* indicia of reliability since it does not contain any official stamp or letterhead from the [REDACTED], and there is neither the name nor the signature of the purported [REDACTED] investigator who took the statement.

43. Similarly, during his SPO statement, W04325 clarified that the [REDACTED] note was an account of his meeting with the [REDACTED] authorities but "[REDACTED]."⁴⁷ Therefore this item cannot be admitted for the truth of its contents. Given that it appears to be an incorrect summary of the witness' interview, its probative value and its reliability are only minimal. The admission of this item would unnecessarily overburden the trial record since the events discussed in the [REDACTED] note are already developed in the SPO witness interview.⁴⁸ Last, the anticipated length of the SPO examination-in-chief for this witness, *i.e.* 3 hours, militates against the admission of the

⁴⁵ PTB, para. [REDACTED].

⁴⁶ 043761-043781-ET RED2, paras 5-13.

⁴⁷ *Ibid*, para. 14.

⁴⁸ *Ibid*.

[REDACTED] notes; the SPO will have enough time to elicit during direct examination any issues not covered by the SPO statement.

2. Associated Exhibits

44. The Defence has no objection to the admission of W04325's proposed associated exhibits.⁴⁹

F. W04491

45. W04491 is intended to give evidence on his detention and the detention of his [REDACTED] in [REDACTED].

1. Rule 154 Statement

46. The SPO seeks to tender W04491's SPO statement, to which the Defence has no objections.⁵⁰ The Defence also does not object to the admission of a letter written to [REDACTED] by W04491.⁵¹

2. Associated Exhibits

47. The Defence does, however, object to the tendering of a criminal file from [REDACTED], dated [REDACTED],⁵² since it does not constitute an inseparable and indispensable part of W04491's statement and has low probative value and reliability. The report is not signed by the witness, is only mentioned in passing in the SPO statement,⁵³ and is noted to be one component of a larger report, which has not been provided to the SPO. The report may therefore be "connected" to the witness' statement, but beyond noting that they are "used" in conjunction with the witness, the SPO has

⁴⁹ KSC-BC-2020-06/F01788/A05.

⁵⁰ 071102-TR-ET Parts 1 and 2.

⁵¹ 081911-081911 RED2.

⁵² 081912-081912 RED2.

⁵³ 071102-TR-ET Part 1, p. 57, lines 2-4.

failed to substantiate that it is either inseparable or indispensable to the witness' evidence.⁵⁴

48. An additional photograph provided by the witness, is also subject to similar objections. It is not marked by the witness, is only briefly commented on for the purposes of identifying [REDACTED],⁵⁵ and does not relate any further to the incident described in the SPO statement. It is not an inseparable or indispensable part of W04491's statement. It should therefore not be admitted pursuant to Rule 154.

G. W04753

49. W04753 will provide evidence on the early structure of the KLA in [REDACTED].

1. Rule 154 Statement

50. The Defence does not hold any objections to the admission of W04753 SPO interview, recognising that they meet the requisite standards for admissibility.⁵⁶

2. Associated Exhibits

51. The Defence objects to the admission of U001-8666-U001-8666, a purported decision regarding entrance given to [REDACTED], dated [REDACTED]. The witness has no knowledge of the document pursuant to his statement and recognises that a signature "could be" attributed to [REDACTED] but requests further verification.⁵⁷ Later in the same statement, W04753 notes "[REDACTED]."⁵⁸ He more broadly indicates having never seen any

⁵⁴ Motion, para. 57.

⁵⁵ *Idem*, p. 56, line 19 – p. 57, line 1.

⁵⁶ 083285-TR-ET Parts 1-8 RED2; 083285-TR-AT Parts 1-8 RED2.

⁵⁷ 083285-TR-ET Part 5, p. 25, lines 24-25.

⁵⁸ *Idem*, p. 27, line 2.

decisions of the type shown to him.⁵⁹ Given all of these cumulative factors, W04753 is in no position to be able to authenticate or comment on the nature of the document, and its absence from his statement would detract little from his testimony, let alone rendering the statement “incomplete or incomprehensible.”⁶⁰ For these reasons, this document is not an inseparable or indispensable part of his testimony and should not be admitted through Rule 154.

52. The Defence further objects to the admission of U000-6519-U000-6519, which was shown to the witness as Exhibit 15 and relates to the [REDACTED] by [REDACTED] and [REDACTED].⁶¹ The document was not authored by W04753 and he noted that he himself did not participate in [REDACTED], nor had he witnessed [REDACTED].⁶² Additionally, he had never seen the document before, or anything like the document that was shown to him.⁶³ The witness’ speculation that the military police in [REDACTED] “might have done” such an activity,⁶⁴ is wholly insufficient to render the document an inseparable or indispensable part of the witness’ testimony, and the document should therefore not be admitted through Rule 154.

53. The remaining exhibits⁶⁵ are not contested by the Defence, as they have been annotated and discussed in detail in the witness’ statements, and constitute an inseparable and indispensable part of W04753’s statements.

⁵⁹ *Idem*, p. 26, lines 5-15.

⁶⁰ Motion, para. 67.

⁶¹ 083285- TR- ET Part 8, p. 30, line 1.

⁶² *Idem*, p. 30, line 25 – p. 31, line 1.

⁶³ *Idem*, p. 31, lines 17-21.

⁶⁴ *Idem*, p. 31, line

⁶⁵ 083286-083518 RED3, p. 083286; 083287-083349-ET RED2; 083286-083518 RED3, U017-2627-U017-2689; U001-7995-U001-7995-ET; 083286-083518 RED3, pp. 083506-083512; 083286-083518 RED3, p. 083513; 083286-083518 RED3, pp. 083514-083517; U000-6159-U000-6159-ET Revised.

III. CONFIDENTIALITY

54. These submissions are filed confidentially pursuant to Rule 82(4) as they respond to confidential submissions filed by the SPO. The Defence will submit a public redacted version of the present submissions in due course.

IV. CONCLUSION AND RELIEF REQUESTED

55. In light of the above, the Defence respectfully requests the Trial Panel to take notice of the Defence objections, and to **DENY** the admission of:

- W00208's [REDACTED] and [REDACTED] testimonies;
- W02082's statement extracted from [REDACTED] as an associated exhibit;
- W02475's associated exhibits with the exception of [REDACTED];
- W04147's evidence that goes to the acts and conduct of the Accused and/or relate to the alleged organisation of the KLA and crimes committed by the KLA, especially paras 19-24, 83-87, and 104-144;
- W04147's [REDACTED] as associated exhibits;
- W04147's [REDACTED];
- W04325's evidence in his SPO statement relating to [REDACTED]'s presence in [REDACTED] and his ability to give orders;
- W04325's [REDACTED] notes;
- W04491's criminal file from [REDACTED] and a photograph provided by the witness as associated exhibits;

- W04753's decision regarding entrance given to [REDACTED] and document concerning the [REDACTED] by [REDACTED] and [REDACTED] as associated exhibits.

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Respectfully submitted on 25 September 2023,



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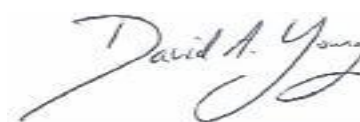
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