



SPECIALIST PROSECUTOR'S OFFICE  
ZYRA E PROKURORIT TË SPECIALIZUAR  
SPECIJALIZOVANO TUŽILAŠTVO

**In:** KSC-BC-2020-06  
**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:** Specialist Prosecutor's Office

**Date:** 6 October 2023

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**Public Redacted Version of 'Prosecution request to amend the Exhibit List with confidential Annexes 1-5'**

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## I. INTRODUCTION

1. As foreshadowed,<sup>1</sup> and pursuant to Article 40 of the Law<sup>2</sup> and Rule 118(2) of the Rules,<sup>3</sup> the Specialist Prosecutor's Office ('SPO') requests leave to amend the Exhibit List<sup>4</sup> to include material, namely, [REDACTED] and related materials generated, used, or reassessed in the context of [REDACTED]<sup>5</sup> (collectively, 'Requested Amendments').<sup>6</sup> This request – which, at this stage, solely concerns amendment of the Exhibit List and not admission<sup>7</sup> – is relatively limited in scope, allows timely and effective Defence preparations, and concerns relevant material, which is probative of the charges.<sup>8</sup>

## II. SUBMISSIONS

2. This complex multi-Accused case involves a considerable amount of evidence, and is being conducted [REDACTED]. In such circumstances, amendments to the Exhibit List should be treated with flexibility, provided that – as is the case here – there

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<sup>1</sup> Prosecution request to amend the Exhibit List, KSC-BC-2020-06/F01689, 20 July 2023, Confidential, fn.5.

<sup>2</sup> Law No.05/L-053 on Specialist Chambers and Specialist Prosecutor's Office, 3 August 2015 ('Law').

<sup>3</sup> Rules of Procedure and Evidence Before the Kosovo Specialist Chambers, KSC-BD-03/Rev3/2020, 2 June 2020 ('Rules'). All references to 'Rule' or 'Rules' herein refer to the Rules, unless otherwise specified.

<sup>4</sup> Annex 1 to Prosecution submission of amended exhibit list, KSC-BC-2020-06/F01802/A01, 19 September 2023, Strictly Confidential and *Ex Parte* ('Exhibit List').

<sup>5</sup> [REDACTED].

<sup>6</sup> The Requested Amendments have been disclosed in Disclosure package 967, except those included at Annexes 1 to 5, as also indicated in the relevant sections below.

<sup>7</sup> See Decision on Prosecution Request to Amend the Exhibit List and Related Matters, KSC-BC-2020-06/F01352, 8 March 2023, Confidential ('8 March 2023 Decision'), para.31 (an evaluation of proposed amendments to the Exhibit List does not call for an assessment of admissibility, but a *prima facie* evaluation only); Decision on Prosecution Request to Add Five Items Relating to Expert Witness to the Exhibit List, KSC-BC-2020-06/ F01544, 23 May 2023 ('23 May 2023 Decision'), para.11; Decision on Prosecution Request to Add Intercepted Communications to the Exhibit List, KSC-BC-2020-06/F01656, 7 July 2023, Confidential, para.11; Decision on Prosecution Requests to Amend the Exhibit List (F01689 and F01747), KSC-BC-2020-06/F01785, 12 September 2023, Confidential ('12 September 2023 Decision'), para.17.

<sup>8</sup> See 8 March 2023 Decision, KSC-BC-2020-06/F01352, paras 29, 31, 33; Decision on Thaçi's Appeal against "Decision on Specialist Prosecutor's Request to Amend its Exhibit List and to Authorise Related Protective Measures", KSC-BC-2020-06/IA019/F00006, 12 July 2022 ('Appeal Decision'), para.21. See also 23 May 2023 Decision, KSC-BC-2020-06/F01544, para.11.

is adequate protection of the Accused's rights.<sup>9</sup> Considering the stage of the trial proceedings,<sup>10</sup> the scope of the case, and the relatively limited nature and scope of the Requested Amendments,<sup>11</sup> there is minimal impact on Defence preparations.

3. The evidence of the [REDACTED] witnesses has not yet been heard or tendered in this case, and none are currently noticed as reserve or scheduled witnesses. Accordingly, the Defence will have sufficient time to review the items, prepare,<sup>12</sup> and challenge the evidence of the relevant witnesses.<sup>13</sup>

4. In making this request, the SPO has considered relevant adjudicated facts concerning the [REDACTED],<sup>14</sup> which relate to many of the same victims, perpetrators, and crimes concerned by the Requested Amendments. However, considering the Defence's right to seek to rebut such adjudicated facts and the Panel's discretion to admit supplemental and corroborative evidence on the same matters,<sup>15</sup> the Requested Amendments should be authorised to enable the SPO to fully present its case. Before ultimately tendering any of the Requested Amendments, the SPO will take into account all relevant circumstances, including the state of the evidence heard and admitted to date, decisions and submissions, and adjudicated facts.

5. Moreover, it is in the interest of fair and expeditious proceedings, balancing the rights of victims, witnesses, and the Parties, that the SPO has the opportunity to rely

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<sup>9</sup> See 8 March 2023 Decision, KSC-BC-2020-06/F01352, paras 29, 31; Appeal Decision, KSC-BC-2020-06/IA019/F00006, para.21; 12 September 2023 Decision, KSC-BC-2020-06/F01785, para.16

<sup>10</sup> See 12 September 2023 Decision, KSC-BC-2020-06/F01785, para.21.

<sup>11</sup> Compare Order on the Conduct of Proceedings, KSC-BC-2020-06/F01226/A01, 25 January 2023, para.82 (where new material is of significant nature, an opposing Party may seek appropriate relief for preparations).

<sup>12</sup> See KSC-BC-2020-06/F01117/A01. See also 8 March 2023 Decision, KSC-BC-2020-06/F01352, para.33 (where the Trial Panel considered this factor in relation to the impact of requested amendments on the Accused's preparation for trial); 12 September 2023 Decision, KSC-BC-2020-06/F01785, paras 26, 40, 55, 61, 73, 79.

<sup>13</sup> See, similarly, 12 September 2023 Decision, KSC-BC-2020-06/F01785, para.22 (whether the Defence has an opportunity to cross-examine witnesses in relation to newly added documents is one of the reasons for greater scrutiny of requests to amend the Exhibit List as proceedings advance).

<sup>14</sup> KSC-BC-2020-06/F01534/A01, [REDACTED].

<sup>15</sup> Decision on Prosecution Motion for Judicial Notice of Adjudicated Facts, KSC-BC-2020-06/F01534, 17 May 2023, para.13.

on and, as appropriate, use, *inter alia*, prior statements (and related materials) of witnesses, provided they have been disclosed in a manner that enables effective Defence preparations. The quality, accuracy, and completeness of a witness's testimony and the interests of justice could otherwise be undermined. In this respect, the SPO intends to tender the evidence of W04366, [REDACTED], and [REDACTED] pursuant to Rule 154 and of [REDACTED] pursuant to Rule 153.<sup>16</sup> Their [REDACTED] – upon which the SPO intends to rely, if this request is granted – are their most recent statements, [REDACTED] and specifically address charged crimes in this case.

6. Further, the Panel has cautioned the SPO that, if it foresees the possibility of tendering or using prior statements and associated exhibits to, *inter alia*, refresh a witness's memory or confront an adverse witness (Rule 143(1)-(2)), the SPO's obligation to seek an Exhibit List amendment is triggered.<sup>17</sup> Being prior statements (and related materials) of witnesses on the Witness List, the SPO foresees the possibility of both tendering and using the Requested Amendments.

#### A. THE REQUEST IS TIMELY

7. [REDACTED].<sup>18</sup> Promptly after [REDACTED] were made available, the SPO took necessary measures to gather, review, disclose,<sup>19</sup> and prepare the Requested Amendments, which consist of [REDACTED] and related materials. Accordingly, this request is timely as the material was either recently obtained, used, or reassessed by the SPO in light of developments in the [REDACTED]. Further, the Requested Amendments relate to witnesses who are not yet scheduled to testify.<sup>20</sup>

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<sup>16</sup> Annex 2 to Prosecution submission of updated witness list and confidential redacted version of pre-trial brief, KSC-BC-2020-06/F01594/A02, 9 June 2023, Confidential ('Witness List').

<sup>17</sup> 8 March 2023 Decision, KSC-BC-2020-06/F01352, para.20.

<sup>18</sup> [REDACTED].

<sup>19</sup> As also noted above, *see* Disclosure 967.

<sup>20</sup> *See e.g.* 12 September 2023 Decision, KSC-BC-2020-06/F01785, paras 26, 38, 52, 65, 71.

## B. GOOD CAUSE EXISTS FOR THE REQUESTED AMENDMENTS

8. The Requested Amendments include: (i) [REDACTED] of W04366, [REDACTED], relevant associated exhibits, and still images of [REDACTED];<sup>21</sup> (ii) [REDACTED] of one expert witness in the [REDACTED] the SPO [REDACTED], but whose reports were relied upon by [REDACTED];<sup>22</sup> and (iii) material recently obtained, used, or reassessed [REDACTED].<sup>23</sup>

(i) [REDACTED] of W04366, [REDACTED], and associated exhibits

9. The SPO requests the addition to the Exhibit List of the [REDACTED] of W04366, [REDACTED] relevant associated exhibits, and screenshots/still images from of [REDACTED].<sup>24</sup> W04366, [REDACTED] are on the Witness List<sup>25</sup> and their prior statements and/or [REDACTED] expert reports are already on the Exhibit List. The material is therefore *prima facie* relevant and of sufficient importance to justify its addition to the Exhibit List.

10. W04366 and [REDACTED] were detained at [REDACTED] and subjected to physical violence and ill-treatment by KLA members. They witnessed other detainees being beaten and provide evidence on the murder of [REDACTED], a named murder victim in the Indictment.<sup>26</sup> [REDACTED] are proposed to provide evidence as expert witnesses. They are, respectively, a [REDACTED], and their reports concern murder victim [REDACTED].<sup>27</sup>

11. The [REDACTED] of W04366's and [REDACTED] are consistent and substantially overlap with the witnesses' evidentiary material currently on the Exhibit List, providing, however, additional details and a more complete record, since

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<sup>21</sup> See Disclosure Package 967, [REDACTED].

<sup>22</sup> See Annex 1.

<sup>23</sup> See Disclosure Package 967, items [REDACTED]. See also Annexes 2-5.

<sup>24</sup> [REDACTED] are pictures (or still images) from [REDACTED] where he pointed at specific parts of a [REDACTED].

<sup>25</sup> See Witness List, KSC-BC-2020-06/F01594/A02 [REDACTED].

<sup>26</sup> Amended Indictment, KSC-BC-2020-06/F00999/A01, 30 September 2022, Confidential ('Indictment'), [REDACTED], Schedule B, [REDACTED].

<sup>27</sup> Their reports also concern other charged murder victims in this case.

[REDACTED]. Likewise, the [REDACTED] contain clarifications on these witnesses' expert reports.

12. The associated exhibits are versions of items already on the Exhibit List,<sup>28</sup> which have now been marked by the relevant witnesses [REDACTED].<sup>29</sup> In the proposed screenshots, [REDACTED] indicates specific parts of [REDACTED]. These associated exhibits and screenshots, therefore, complement the information contained in the [REDACTED] for these witnesses and are an integral part thereof.

(ii) *[REDACTED] of the [REDACTED] Reports Author*<sup>30</sup>

13. [REDACTED] is the [REDACTED] of an expert witness in the [REDACTED] ('[REDACTED] Reports Author') who prepared a [REDACTED] analysis concerning [REDACTED]<sup>31</sup> and an [REDACTED] analysis on [REDACTED].<sup>32</sup> While, the SPO does not intend to call the [REDACTED] Reports Author to testify [REDACTED], this material is *prima facie* relevant and of sufficient importance to justify its addition to the Exhibit List. In this respect, during his [REDACTED], the [REDACTED] Reports Author provided clarifications on his [REDACTED] reports, which are on the Exhibit List<sup>33</sup> and about which [REDACTED]<sup>34</sup> provides his expert opinion.<sup>35</sup>

(iii) *Material used during or reassessed following the [REDACTED]*

14. The Requested Amendments also include a limited number of items related to and obtained, used, or reassessed [REDACTED].

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<sup>28</sup> [REDACTED].

<sup>29</sup> [REDACTED]. [REDACTED]. [REDACTED]. [REDACTED]. [REDACTED]. [REDACTED]. [REDACTED].

<sup>30</sup> Annex 1.

<sup>31</sup> [REDACTED] (Item 6702 on the Exhibit List).

<sup>32</sup> [REDACTED].

<sup>33</sup> See Annex 1, [REDACTED].

<sup>34</sup> [REDACTED]. The SPO requests the addition of his [REDACTED] to the Exhibit List. See paras 9-11 above.

<sup>35</sup> [REDACTED] does so in his expert reports [REDACTED].

(a) [REDACTED]– Note of a meeting with [REDACTED]<sup>36</sup>

15. [REDACTED] is a note of a meeting held by the SPO with expert witness [REDACTED] on [REDACTED] 2023. During this meeting, [REDACTED] provided clarifications on, *inter alia*, the scientific meaning of the terminology [REDACTED] and the verifications he was able to carry out on the results contained in the [REDACTED] Report.<sup>37</sup>

16. The material is *prima facie* relevant and of sufficient importance to justify its addition to the Exhibit List. As noted above, [REDACTED] prepared two reports where he provides expert opinion on the [REDACTED] Reports.<sup>38</sup> The proposed item clarifies and completes [REDACTED]'s evidence and is necessary to better understand the [REDACTED] Reports. As also noted earlier, the [REDACTED] Reports and [REDACTED]'s expert reports are already on the Exhibit List.

(b) [REDACTED]– Material related to the [REDACTED]<sup>39</sup>

17. [REDACTED]<sup>40</sup> [REDACTED].<sup>41</sup>

18. The material is *prima facie* relevant and of sufficient importance to justify its addition to the Exhibit List. The [REDACTED] Reports Author conducted an analysis of the [REDACTED] and produced a report with this analysis.<sup>42</sup> [REDACTED].<sup>43</sup> [REDACTED] show that the [REDACTED] taken from the [REDACTED] was sent to the [REDACTED] Report Author's institute for analysis.

19. The two items complement the [REDACTED] Reports by providing information on [REDACTED] and source of the material analysed therein. Although

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<sup>36</sup> See Disclosure Package 967, item [REDACTED].

<sup>37</sup> [REDACTED].

<sup>38</sup> [REDACTED].

<sup>39</sup> Annexes 2-3, [REDACTED].

<sup>40</sup> Annex 2, [REDACTED]. The item also contains a related email exchange between the [REDACTED].

<sup>41</sup> Annex 3, [REDACTED].

<sup>42</sup> As mentioned earlier, this is [REDACTED] (Item 6702 on the Exhibit List).

<sup>43</sup> Annex 1, [REDACTED].

these items could have been added to the Exhibit List sooner, the significance of these documents in relation to the [REDACTED] Reports Author was reassessed [REDACTED].<sup>44</sup> The material is not lengthy (a total of only 10 pages) and was already available to the Defence since the two items were disclosed under Rule 102(3) in September and October 2022.<sup>45</sup>

(c) [REDACTED]– Note of a meeting with [REDACTED]<sup>46</sup>

20. [REDACTED] is a note of a meeting held by the SPO with [REDACTED] on [REDACTED] 2023. [REDACTED] provided clarifications on his [REDACTED], including the procedures used for conducting an [REDACTED], the findings and conclusions on the [REDACTED].<sup>47</sup> [REDACTED] also provided corrections and clarifications in relation to the [REDACTED] reports he produced for [REDACTED].<sup>48</sup>

21. The material is *prima facie* relevant and of sufficient importance to justify its addition to the Exhibit List. The [REDACTED] report and two [REDACTED] reports<sup>49</sup> discussed in [REDACTED] are on the Exhibit List.<sup>50</sup> Another report discussed in [REDACTED]<sup>51</sup> was already disclosed under Rule 102(3) to all Defence teams and is part of the Requested Amendments.<sup>52</sup> [REDACTED] on the content of this note.<sup>53</sup> The note of the meeting is only three pages long, and clarifies and completes [REDACTED]'s evidence in the discussed reports and in his [REDACTED].

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<sup>44</sup> [REDACTED]. [REDACTED]. [REDACTED].

<sup>45</sup> [REDACTED] (Disclosure 512: Rule 102(3), 2022-09-29, HT; Disclosure 522: Rule 102(3), 2022-09-30, KV; Disclosure 524: Rule 102(3), 2022-09-30, JK); [REDACTED] (Disclosure 503: Rule 102(3), 2022-09-26, RS; Disclosure 512: Rule 102(3), 2022-09-29, HT; Disclosure 522: Rule 102(3), 2022-09-30, KV; Disclosure 571: Rule 102(3), 2022-10-13, JK).

<sup>46</sup> See Disclosure Package 967, item [REDACTED].

<sup>47</sup> [REDACTED].

<sup>48</sup> See [REDACTED]. [REDACTED].

<sup>49</sup> [REDACTED].

<sup>50</sup> [REDACTED] (item 662 on the Exhibit List); [REDACTED] (item 6764 on the Exhibit List); [REDACTED] (item 6767 on the Exhibit List).

<sup>51</sup> As explained below, it is a near duplicate of another report discussed in the note. See [REDACTED].

<sup>52</sup> See paras 22-24 below.

<sup>53</sup> See Disclosure Package 967, [REDACTED].



(d) [REDACTED]– Report of [REDACTED]<sup>54</sup>

22. [REDACTED] is a Report of [REDACTED].

23. The item is *prima facie* relevant and of sufficient importance to justify its addition to the Exhibit List. It is a near duplicate of an item already on the Exhibit List,<sup>55</sup> however, with two additional pages.<sup>56</sup> The additional pages contain [REDACTED].<sup>57</sup> While this does not alter the previous conclusions,<sup>58</sup> the requested addition is a more complete version of the report already on the Exhibit List.<sup>59</sup>

24. Although this item could have been added to the Exhibit List sooner, the significance of the information contained in the additional pages was only recently reassessed [REDACTED]. The Requested Amendment was disclosed under Rule 102(3) on 30 January 2023 and was therefore available to the Defence. Further, the substantive additional information, compared to the version on the Exhibit List, is contained in only two pages.

(e) [REDACTED]– Official note of meeting with the [REDACTED] Reports Author<sup>60</sup>

25. [REDACTED] is an official note of an SPO meeting with the [REDACTED] Reports Author, dated [REDACTED].<sup>61</sup> The [REDACTED] Reports Author provided the SPO with clarifications on the Institute where he is employed, and on specific

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<sup>54</sup> See Disclosure Package 967, [REDACTED].

<sup>55</sup> [REDACTED] (item 6761 on the Exhibit List).

<sup>56</sup> See Disclosure Package 967, [REDACTED] also contains two other additional pages, at p. [REDACTED], which are not present in [REDACTED]. They are identical cover pages for the [REDACTED]. The cover page sums up information concerning [REDACTED].

<sup>57</sup> See Disclosure Package 967, [REDACTED]. See also [REDACTED], where the recommendations from [REDACTED].

<sup>58</sup> See Disclosure Package 967, [REDACTED], where the conclusion states [REDACTED].

<sup>59</sup> The near duplicate on the Exhibit List ([REDACTED]) however, contains two initial pages which are not contained in the proposed addition ([REDACTED]), and consist of the [REDACTED].

<sup>60</sup> Annex 4, [REDACTED].

<sup>61</sup> The SPO is also requesting the addition of the [REDACTED] Reports Author's [REDACTED] to the Exhibits List. See para.13 above.

passages from: (i) the [REDACTED] Report,<sup>62</sup> concerning the [REDACTED] used in the examination and the modalities of their receipt; and (ii) [REDACTED].<sup>63</sup> As mentioned earlier, both the [REDACTED] Report and [REDACTED] Report are on the Exhibit List.

26. Although the [REDACTED] Reports Author is not a witness [REDACTED], — who is anticipated to testify [REDACTED] — based his expert opinion on, *inter alia*, the [REDACTED] Report and [REDACTED] Report. The Requested Amendment is only one and a half pages long, and only contains clarification of information on the Exhibit List.

(f) [REDACTED]<sup>64</sup>

27. [REDACTED] is the underlying data used for the [REDACTED] analysis performed by the [REDACTED] Reports Author and discussed in his [REDACTED] Report.<sup>65</sup> The document was provided by the [REDACTED] Reports Author.<sup>66</sup>

28. The item is *prima facie* relevant and of sufficient importance to justify its addition to the Exhibit List. It concerns the [REDACTED] of an individual murdered [REDACTED]. [REDACTED],<sup>67</sup> stating, *inter alia*, that he had reviewed this data and confirmed his expert opinion that, upon their review, [REDACTED].<sup>68</sup> He also provided an estimate on the [REDACTED].<sup>69</sup> In this respect, [REDACTED], commenting on the [REDACTED], Report,<sup>70</sup> [REDACTED].<sup>71</sup>

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<sup>62</sup> [REDACTED] (item 6702 on the Exhibit List).

<sup>63</sup> [REDACTED] (item 19538 on the Exhibit List).

<sup>64</sup> Annex 5, [REDACTED].

<sup>65</sup> [REDACTED].

<sup>66</sup> See also Annex 4, para.3(e).

<sup>67</sup> See Disclosure Package 967, [REDACTED].

<sup>68</sup> See Disclosure Package 967, [REDACTED].

<sup>69</sup> See Disclosure Package 967, [REDACTED].

<sup>70</sup> [REDACTED].

<sup>71</sup> See [REDACTED].

29. Therefore, the Requested Amendment – which is only one page – supplements the [REDACTED] Report, which is on the Exhibit List, and enabled [REDACTED] to supplement his expert opinion evidence accordingly.

C. THERE IS LIMITED, IF ANY, PREJUDICE TO THE DEFENCE

30. No undue prejudice would result from adding the Requested Amendments to the Exhibit List. None of the [REDACTED] relate to currently noticed (scheduled or reserve) witnesses.<sup>72</sup> Accordingly, the Defence will have sufficient time to review the items and prepare before the witnesses testify in this case. Further, the new information contained in the Requested Amendments is limited and the Defence has long had notice of the scope of the witnesses' evidence through, *inter alia*, the Rule 95 summaries and disclosed materials.<sup>73</sup> In this respect, the Requested Amendments relate to known aspects of the SPO's case, including witnesses on the Witness List, exhibits already on the Exhibit List, and a known detention site and murder victim.<sup>74</sup>

31. The [REDACTED] cover the same or similar information as these witnesses' prior statements and related materials already on the Exhibit List. Further, in addition to being disclosed, [REDACTED]. In relation to the associated exhibits, these are marked versions of items already on the Exhibit List.

32. As to the other material recently produced, these items are very limited. In total, they amount to seven pages.<sup>75</sup> Finally, for the remaining items used or reassessed

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<sup>72</sup> See KSC-BC-2020-06/F01117/A01. See also 8 March 2023 Decision, KSC-BC-2020-06/F01352, para.33 (where the Trial Panel considered this factor in relation to the impact of requested amendments on the Accused's preparation for trial).

<sup>73</sup> Underlining the lack of prejudice, other Chambers have not required a witness's prior statements to be on a party's exhibit list for admission, let alone for use under procedures equivalent to Rule 143(1)-(2), considering that the Defence has notice of the witness's expected evidence through their summaries and disclosed statements. See e.g. ICTY, *Prosecutor v. Perišić*, IT-04-81-T, Trial Chamber's Ruling on Defence Motion to Clarify Whether the Prosecution Must Request Leave to Amend Its Rule 65 *ter* Exhibit List, 17 November 2008, para.14; STL, *Prosecutor v. Ayyash et al.*, STL-11-01/T/TC, Decision on Prosecution Motion to Admit Statements of Witnesses PRH575 and PRH703, 21 October 2015, paras 17-19.

<sup>74</sup> See, *similarly*, Appeal Decision, KSC-BC-2020-06/IA019/F00006, paras 21-22.

<sup>75</sup> See paras 15-16, 20-21, 25-29 above.

[REDACTED], although the SPO could have added these items to the Exhibit List sooner, their significance was only recently reassessed, in particular, [REDACTED]. The prejudice is minimal since the items were already available to the Defence.<sup>76</sup>

### III. CLASSIFICATION

33. This filing and Annexes 1-5 are confidential in accordance with Rule 82(4) and to give effect to existing protective measures, including for witnesses whose identities have not been publicly released. A public redacted version will be filed.

### IV. RELIEF REQUESTED

34. For the foregoing reasons, the Panel should authorise the Requested Amendments.

**Word Count: 4332**

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/signed/

**Ward Ferdinandusse**  
**Acting Deputy Specialist Prosecutor**

Friday, 6 October 2023

At The Hague, the Netherlands.

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<sup>76</sup> [REDACTED] (Disclosure 512: Rule 102(3), 2022-09-29, HT; Disclosure 522: Rule 102(3), 2022-09-30, KV; Disclosure 524: Rule 102(3), 2022-09-30, JK); [REDACTED] (Disclosure 503: Rule 102(3), 2022-09-26, RS; Disclosure 512: Rule 102(3), 2022-09-29, HT; Disclosure 522: Rule 102(3), 2022-09-30, KV; Disclosure 571: Rule 102(3), 2022-10-13, JK); [REDACTED] (Disclosure 659: Rule 102(3), 2023-01-30, JK KV HT RS).