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SPECIAL COURT FOR SIERRA LEONE  
OFFICE OF THE PROSECUTOR  
FREETOWN – SIERRA LEONE

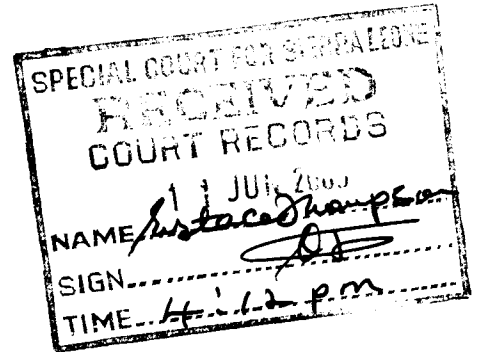
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SCSL-2003-10-PT-008  
(65-67)

Before: Judge Bankole Thompson,  
Designated Judge

Registrar: Robin Vincent

Date filed: 11 June 2003



THE PROSECUTOR

Against

BRIMA BAZZY KAMARA also known as  
IBRAHIM BAZZY KAMARA also known as ALHAJI IBRAHIM KAMARA

CASE NO. SCSL – 2003 – 10 – PT

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**EXTREMELY URGENT**

**PROSECUTION MOTION TO ALLOW DISCLOSURE  
TO THE REGISTRY AND TO KEEP DISCLOSED MATERIAL UNDER  
SEAL UNTIL APPROPRIATE PROTECTIVE MEASURES ARE IN PLACE**

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Office of the Prosecutor:

Luc Côté, Chief of Prosecutions  
Sharan Parmar, Assistant Trial Counsel

Defence Counsel:

John Jones, Acting Chief of Defence Office  
Claire Carlton-Hanciles, Duty Counsel  
Ibrahim Yillah, Duty Counsel  
Hadijatu Kah-Jallow, Duty Counsel  
Sam Scratch, Defence Intern  
Osho Williams  
Hadjibolah Malley Spain

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1. Consistent with Articles 16 and 17 of the Statute of the Special Court for Sierra Leone (the Statute) and pursuant to Rules 53, 54, 66, 69, 73 and 75 of the Special Court's Rules of Procedure and Evidence (Rules), the Prosecution respectfully submits a Motion to allow the transmission of the disclosure materials under Rule 66(A)(i) to the Registry.
2. By motion, dated 11 June 2003, the Prosecution requested immediate protective measures for witnesses and victims and for non-public disclosure.
3. In the motion for immediate protective measures, the Prosecution has requested the Designated Judge or Trial Chamber to order immediate measures to protect the identity of witnesses and to protect confidentiality of all non-public materials disclosed to the Defence. Those measures include:
  - allowing the Prosecution to withhold identifying data of Prosecution's witnesses or any other information which could lead to the identity of such a person to the Defence

until twenty-one (21) days before the witness is to testify at trial;

- prohibiting the Defence from sharing, discussing or revealing, directly or indirectly, any disclosed non-public materials of any sort, or any information contained in such documents, to any person or entity other than the Defence;
- ensuring that the Defence does not interview Prosecution witnesses without the consent of the Chamber and reasonable prior notice to the Prosecution.

4. The initial appearance of the Accused was 4 June 2003. The Prosecution is using this date as the beginning date of its initial disclosure obligations pursuant to Rule 66(A)(i). Accordingly, Rule 66(A)(i) disclosure must be completed no later than 4 July 2003.

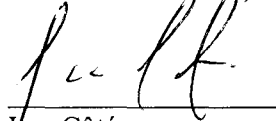
5. On information and belief, the Prosecution has determined it is necessary to take immediate measures to safeguard the security and privacy of witnesses and victims, Prosecution investigations, the integrity of the evidence and of these proceedings. In the event appropriate orders have not been issued by 4 June 2003, interim measures will be required to allow the Prosecution to meet its disclosure obligation as well as to meet its obligation to protect witnesses, victims, the integrity of Prosecution investigations and the integrity of these proceedings.

6. Therefore, absent appropriate protective measures, the Prosecution requests the Designated Judge to issue:

- (a) an Order allowing the Prosecution to transmit its disclosure materials under Rule 66(A)(i) to the Registry;
- (b) an Order to the Registry to keep the disclosed material under seal until the Designated Judge or the Trial Chamber has issued orders for appropriate protective measures for witnesses, victims and non-public materials.

Freetown, 11 June 2003.

For the Prosecution,



Luc Côté,  
Chief of Prosecutions