

Ieng Sary's objections to OCP list of new documents put on the Case File by TC Decision E190

1	Type	Date	Title	Doc. No.	Description	Points of the Indictment	Objection
2	Analytical Report	31 May 1976	Analytical Report by Amnesty International entitled The Amnesty International Report 1975-1976: Democratic Kampuchea (Cambodia)	E190.1.391	Describes allegations of widespread executions. Notes that IENG Sary alias Van admitted the execution of three former Khmer Republic officials LONG Boret, SIRIK Matak and LON Non in November 1975.	VII. FACTUAL FINDINGS OF JOINT CRIMINAL ENTERPRISE [41:156 to 220], D. TREATMENT OF TARGETED GROUPS [55:205 to 215], B. IENG SARY [250:994 to 1125], Participation in the Common Purpose [255:1018 to 1121], Targeting of Groups [280:1105 to 1119], Widespread or Systematic [335:1352to1361]	The Defence recognizes that the Trial Chamber has previously found that "material such as analytical reports, books, documentary films, and media articles may be relevant and will not be excluded as a category" (E185, para. 21(5)). However, the Defence submits that analytical reports cannot be accepted at face value as being accurate or objective, especially when these reports may have been prepared by organizations which had an agenda to present a particular version of the events or even to formulate disinformation. Simply, it is virtually impossible to test their validity without, at a minimum, adducing evidence from the author. The report contains information and conclusions not based on direct observation of events. The document is unreliable and unsuitable to prove facts it purports to prove, and it is inadmissible pursuant to Rule 87(3)(c). Further, the author of this document is not presently scheduled to testify in Case 002/01. Because Mr. IENG Sary has not been afforded his absolute right under Rule 84(1) to confront the author of this article, this document is also inadmissible pursuant to Rule 87(3)(d). Should this document be admitted, the Defence submits that limited weight, if any, should be given to it unless the content of the document can be verified or supported through independent indicia. For further argument, <i>see</i> IENG Sary's Objections to the Admissibility of Certain Categories of Documents, 6 September 2011, E114, paras. 1 (Standards for the admission of documentary evidence set by the Establishment Law), 7-9 (Reliability), 11 (Relevance), 18-19 (Reports, articles and non-contemporaneous documents).

3	Analytical Report	14 July 1978	Analytical Report by Amnesty International entitled "Submission from Amnesty International under Commission on Human Rights Decision 9 (XXXIV)"	E190.1.392	Describes, based on refugee accounts, the killing of former Khmer Republic soldiers; killing and discrimination of Cham; prohibition of Buddhism. Describes SALOTH Sar alias POL Pot stating the need to reeducate and eradicate reactionary elements.	VII. FACTUAL FINDINGS OF JOINT CRIMINAL ENTERPRISE [41:156 to 220], D. TREATMENT OF TARGETED GROUPS [55:205 to 215], Treatment of Buddhists [184:740 to 744], Treatment of the Cham [186:745 to 790], Treatment of Vietnamese [196:791 to 841], B. IENG SARY [250:994 to 1125], Roles and Functions [251:1001 to 1017], Deputy Prime Minister for Foreign Affairs [252:1005 to 1014]	The Defence recognizes that the Trial Chamber has previously found that "material such as analytical reports, books, documentary films, and media articles may be relevant and will not be excluded as a category" (E185, para. 21(5)). However, the Defence submits that analytical reports cannot be accepted at face value as being accurate or objective, especially when these reports may have been prepared by organizations which had an agenda to present a particular version of the events or even to formulate disinformation. Simply, it is virtually impossible to test their validity without, at a minimum, adducing evidence from the author. The report contains information and conclusions not based on direct observation of events. The document is unreliable and unsuitable to prove facts it purports to prove, and it is inadmissible pursuant to Rule 87(3)(c). Further, the author of this document is not presently scheduled to testify in Case 002/01. Because Mr. IENG Sary has not been afforded his absolute right under Rule 84(1) to confront the author of this article, this document is also inadmissible pursuant to Rule 87(3)(d). Should this document be admitted, the Defence submits that limited weight, if any, should be given to it unless the content of the document can be verified or supported through independent indicia. For further argument, <i>see</i> IENG Sary's Objections to the Admissibility of Certain Categories of Documents, 6 September 2011, E114, paras. 1 (Standards for the admission of documentary evidence set by the Establishment Law), 7-9 (Reliability), 11 (Relevance), 18-19 (Reports, articles and non-contemporaneous documents).
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4	Analytical Report	29 April 1997	Analytical Report by DC-Cam entitled "Mapping the Killing Fields of Cambodia 1997: khet Banteay Meanchey"	E190.1.393	Describes a number of execution sites located in the Banteay Meanchey Province with names of witnesses and summaries of the information provided by them, detailing mass graves, the composition of the victims, including Cambodian civil servants, and persons of Chinese and Vietnamese origin.	VII. FACTUAL FINDINGS OF JOINT CRIMINAL ENTERPRISE [41:156 to 220], C. SECURITY CENTRES AND EXECUTION SITES [47:178 to 204], D. TREATMENT OF TARGETED GROUPS [55:205 to 215], Treatment of Vietnamese [196:791 to 841]	The Defence recognizes that the Trial Chamber has previously found that "material such as analytical reports, books, documentary films, and media articles may be relevant and will not be excluded as a category" (E185, para. 21(5)). However, the Defence submits that analytical reports cannot be accepted at face value as being accurate or objective, especially when these reports may have been prepared by organizations which had an agenda to present a particular version of the events or even to formulate disinformation. Such is the case with DC-Cam, an organization the Defence submits is biased and takes as its starting point the conclusion that genocide occurred in Cambodia. Simply, it is virtually impossible to test their validity without, at a minimum, adducing evidence from the author. The report contains information and conclusions not based on direct observation of events. The document is unreliable and unsuitable to prove facts it purports to prove, and it is inadmissible pursuant to Rule 87(3)(c). Further, the author of this document is not presently scheduled to testify in Case 002/01. Because Mr. IENG Sary has not been afforded his absolute right under Rule 84(1) to confront the author of this article, this document is also inadmissible pursuant to Rule 87(3)(d). Should this document be admitted, the Defence submits that limited weight, if any, should be given to it unless the content of the document can be verified or supported through independent indicia. For further argument, <i>see</i> IENG Sary's Objections to the Admissibility of Certain Categories of Documents, 6 September 2011, E114, paras. 1 (Standards for the admission of documentary evidence set by the Establishment Law), 7-9 (Reliability), 11 (Relevance), 18-19 (Reports, articles and non-contemporaneous documents).
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5	Analytical Report	21 June 1999 - 25 June 1999	Analytical Report by DC-Cam entitled "Banteay Meanchey Province"	E190.1.394	Describes co-operatives, security centres and execution sites located in Banteay Meanchey Province. Contains summaries of the information provided by local witnesses, including testimonies regarding forced evacuation, forced labour, starvation, unlawful killings and the purge of Northwest Zone cadre by Southwest Zone.	VII. FACTUAL FINDINGS OF JOINT CRIMINAL ENTERPRISE [41:156 to 220], B. COOPERATIVES AND WORKSITES [44:168 to 177], C. SECURITY CENTRES AND EXECUTION SITES [47:178 to 204], "Purges" [52:192 to 204], Purge of the Old and New North Zones [52:193 to 198]	The Defence recognizes that the Trial Chamber has previously found that "material such as analytical reports, books, documentary films, and media articles may be relevant and will not be excluded as a category" (E185, para. 21(5)). However, the Defence submits that analytical reports cannot be accepted at face value as being accurate or objective, especially when these reports may have been prepared by organizations which had an agenda to present a particular version of the events or even to formulate disinformation. Such is the case with DC-Cam, an organization the Defence submits is biased and takes as its starting point the conclusion that genocide occurred in Cambodia. Simply, it is virtually impossible to test their validity without, at a minimum, adducing evidence from the author. The report contains information and conclusions not based on direct observation of events. The document is unreliable and unsuitable to prove facts it purports to prove, and it is inadmissible pursuant to Rule 87(3)(c). Further, the author of this document is not presently scheduled to testify in Case 002/01. Because Mr. IENG Sary has not been afforded his absolute right under Rule 84(1) to confront the author of this article, this document is also inadmissible pursuant to Rule 87(3)(d). Should this document be admitted, the Defence submits that limited weight, if any, should be given to it unless the content of the document can be verified or supported through independent indicia. For further argument, <i>see</i> IENG Sary's Objections to the Admissibility of Certain Categories of Documents, 6 September 2011, E114, paras. 1 (Standards for the admission of documentary evidence set by the Establishment Law), 7-9 (Reliability), 11 (Relevance), 18-19 (Reports, articles and non-contemporaneous documents).
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6	Analytical Report	August 1999	Analytical Report by Stephen HEDER entitled "Documentary Evidence Linking Surviving Senior Leaders of the Communist Party of Kampuchea to Crimes Against Humanity in Cambodia, 1975-1979"	E190.1.397	Describes an analysis of DK telegrams in the DC-Cam archives which tend to implicate NUON Chea and IENG Sary alias Van in crimes, such as requests to the Center from zone leaders for authorization to conduct executions.	II. ADMINISTRATIVE STRUCTURES (CENTRE) [16:33 to 63], C. STANDING COMMITTEE [18:41 to 47], IV. COMMUNICATION STRUCTURE [25:72 to 112], Communication Within the Centre [25:74 to 75], Zone to Centre Communication [26:76 to 81], Telegram Communication [29:93 to 98], VII. FACTUAL FINDINGS OF JOINT CRIMINAL ENTERPRISE [41:156 to 220], B. COOPERATIVES AND WORKSITES [44:168 to 177], C. SECURITY CENTRES AND EXECUTION SITES [47:178 to 204], D. TREATMENT OF TARGETED GROUPS [55:205 to 215], A. NUON CHEA [214:862 to 993], Roles and Functions [215:869 to 894], Participation in The Common Purpose [222:895 to 992], Security Centres and Execution Sites [228:916 to 974], B. IENG SARY [250:994 to 1125], Membership of the Central and Standing Committees [251:1001 to 1004], Participation in the Common Purpose [255:1018 to 1121], Security Centres and Execution Sites [262:1048 to 1104], Knowledge and Implementation of this Policy Generally [265:1061 to 1066]	This document is an analytical report prepared by Stephen Heder. Stephen Heder is biased as he is a former OCP employee who helped prepare the Introductory Submission against Mr. IENG Sary. Mr. Heder then moved to the OCIJ to investigate the Introductory Submission and prepare the Closing Order indicting Mr. IENG Sary. No material prepared by Mr. Heder should be considered admissible as it is unreliable and unsuitable to prove facts it purports to prove. The Trial Chamber should reject this document pursuant to Rule 87(3)(c). The Trial Chamber has indicated that it will consider the Defence's objections to documents attributed to Stephen Heder when assessing the weight to be accorded to the documents. <i>See</i> Decision on Objections to Documents Proposed to be put before the Chamber on the Co-Prosecutors' Annexes A1-A5 and to Documents Cited in the Paragraphs of the Closing Order Relevant to the First Two Trial Segments of Case 002/01, 9 April 2012, E185, para. 32. For the Defence's objections to Heder, <i>see</i> Trial Management Meeting Transcript, 17 August 2012, p. 25-26; IENG Sary's Application to Seize the Pre-Trial Chamber with a Request for Annulment of All Investigative Acts Performed by or Performed with the Assistance of Stephen Heder and David Boyle, 19 May 2010, D381; IENG Sary's Appeal Against the OCIJ's Constructive Denial of IENG Sary's Application to Seize the Pre-Trial Chamber with a Request for Annulment of All Investigative Acts Performed by or with the Assistance of Stephen Heder & David Boyle and IENG Sary's Application to Seize the Pre-Trial Chamber with a Request for Annulment of All Evidence Collected from the Documentation Center of Cambodia, 3 September 2010, D381/1/1; IENG Sary's Appeal Against the OCIJ's Order Rejecting IENG Sary's Application to Seize the Pre-Trial Chamber with a Request for Annulment of All Investigative Acts Performed by or with the Assistance of Stephen Heder & David Boyle and IENG Sary's Application to Seize the Pre-Trial Chamber with a Request for Annulment of All Evidence Collected from the Documentation Center of Cambodia & Expedited Appeal Against the OCIJ Rejection of a Stay of the Proceedings, 15 September 2010, D402/1/2.
7	Analytical Report	November 2002	Analytical Report by SOKHYM Em entitled "Revolutionary Female Medical Staff in Tram Kak District"	E190.1.399	Details the discipline in the health sector in Tram Kak District; mentions that new people were discriminated by base nurses, that any moral violation would lead to severe punishment or killing, including at Kraing Ta Chan prison; and describes nurses' forced marriages.	VII. FACTUAL FINDINGS OF JOINT CRIMINAL ENTERPRISE [41:156 to 220], E. THE REGULATION OF MARRIAGE [58:216 to 220], Tram Kok Cooperatives [79:302 to 322], Kraing Ta Chan Security Centre [125:489 to 515], Regulation of Marriage [209:842 to 861], D. IENG THIRITH [304:1201 to 1298]	This is <u>not</u> an analytical report, as claimed by the OCP. This is instead a story written for DC-Cam's magazine "Searching for the Truth." This story cites no authority, even for direct quotes. It gives the statements of individuals Mr. IENG Sary has not had the opportunity to confront. Nor has Mr. IENG Sary had the opportunity to confront the author. This document is unreliable and unsuitable to prove facts it purports to prove. The Trial Chamber should reject this document pursuant to Rule 87(3)(c).

8	Analytical Report	March 2003	Analytical Report by Stephen HEDER entitled "Reassessing the Role of Senior Leaders and Local Officials in Democratic Kampuchea Crimes: Cambodian Accountability in Comparative Perspective"	E190.1.398	Draws parallels between the acts of persons in authority in Nazi Germany and the acts of persons in authority in DK; Persons discussed are mainly SALOTH Sar alias POL Pot, NUON Chea, SON Sen alias Khieu alias 47, but also IENG Sary alias Van and KHIEU Samphan alias Haem; Discusses the security issues, concept of "enemy", treatment of the Cham and Buddhist leaders.	IV. COMMUNICATION STRUCTURE [25:72 to 112], Zone to Centre Communication [26:76 to 81], Zone to Sector and District Communication [27:82 to 84], VII. FACTUAL FINDINGS OF JOINT CRIMINAL ENTERPRISE [41:156 to 220], B. COOPERATIVES AND WORKSITES [44:168 to 177], C. SECURITY CENTRES AND EXECUTION SITES [47:178 to 204], D. TREATMENT OF TARGETED GROUPS [55:205 to 215], Movement of the Population from Phnom Penh (Phase 1) [60:221 to 261], Treatment of Buddhists [184:740 to 744], Treatment of the Cham [186:745 to 790], A. NUON CHEA [214:862 to 993], Roles and Functions [215:869 to 894], Participation in The Common Purpose [222:895 to 992], B. IENG SARY [250:994 to 1125], Roles and Functions [251:1001 to 1017], Participation in the Common Purpose [255:1018 to 1121], Security Centres and Execution Sites [262:1048 to 1104], C. KHIEU SAMPHAN [284:1126 to 1200], Roles and Functions [286:1131 to 1152], Participation in the Common Purpose [291:1153 to 1199]	This document is not an analytical report, but is actually a book chapter written by Stephen Heder. Stephen Heder is biased as he is a former OCP employee who helped prepare the Introductory Submission against Mr. IENG Sary. Mr. Heder then moved to the OCIJ to investigate the Introductory Submission and prepare the Closing Order indicting Mr. IENG Sary. No material prepared by Mr. Heder should be considered admissible as it is unreliable and unsuitable to prove facts it purports to prove. The Trial Chamber should reject this document pursuant to Rule 87(3)(c). The Trial Chamber has indicated that it will consider the Defence's objections to documents attributed to Stephen Heder when assessing the weight to be accorded to the documents. See Decision on Objections to Documents Proposed to be put before the Chamber on the Co-Prosecutors' Annexes A1-A5 and to Documents Cited in the Paragraphs of the Closing Order Relevant to the First Two Trial Segments of Case 002/01, 9 April 2012, E185, para. 32. For the Defence's objections to Heder, see Trial Management Meeting Transcript, 17 August 2012, p. 25-26; IENG Sary's Application to Seize the Pre-Trial Chamber with a Request for Annulment of All Investigative Acts Performed by or Performed with the Assistance of Stephen Heder and David Boyle, 19 May 2010, D381; IENG Sary's Appeal Against the OCIJ's Constructive Denial of IENG Sary's Application to Seize the Pre-Trial Chamber with a Request for Annulment of All Investigative Acts Performed by or with the Assistance of Stephen Heder & David Boyle and IENG Sary's Application to Seize the Pre-Trial Chamber with a Request for Annulment of All Evidence Collected from the Documentation Center of Cambodia, 3 September 2010, D381/1/1; IENG Sary's Appeal Against the OCIJ's Order Rejecting IENG Sary's Application to Seize the Pre-Trial Chamber with a Request for Annulment of All Investigative Acts Performed by or with the Assistance of Stephen Heder & David Boyle and IENG Sary's Application to Seize the Pre-Trial Chamber with a Request for Annulment of All Evidence Collected from the Documentation Center of Cambodia & Expedited Appeal Against the OCIJ Rejection of a Stay of the Proceedings, 15 September 2010, D402/1/2.
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9	Analytical Report	30 July 2007	Analytical Report by Craig ETCHESON entitled "OCP Mission to Batheay District, Kampong Cham Province"	E190.1.396	Describes OCP investigation of a security centre at Wat Batheay in Kampong Cham Province, where people from the East Zone cadres were transferred for execution in 1978. Surviving prisoners and perpetrators are identified and photos of skeletal remains included.	Purge of the East Zone [54:199 to 204], Widespread or Systematic [335:1352to1361]	<p>This is a report prepared by an OCP staff member as part of his work with the OCP. This document is OCP work product. The role of the OCP, pursuant to Rule 87(1), is to prove the guilt of Mr. IENG Sary. The document is unreliable and unsuitable to prove facts it purports to prove because its preparer is biased. The Trial Chamber should reject this document pursuant to Rule 87(3)(c). For further argument, <i>see</i> IENG Sary's Objections to the Admissibility of Certain Categories of Documents, 6 September 2011, E114, para. 1 (Standards for the admission of documentary evidence set by the Establishment Law), 2-5 (Standards for the admission of documentary evidence set by the Rules), 7-9 (Reliability), 11 (Relevance), 16 (Documents obtained by the OCP).</p> <p>This report contains witness statements taken by the OCP which were not collected under judicial supervision. It is a summary of what the witness actually said and no audio recordings are available. It is tainted by bias as the role of the OCP, pursuant to Rule 87(1), is to prove the guilt of Mr. IENG Sary. The prejudicial effect of this document on the fairness of the proceedings outweighs its probative value. The document is unreliable and unsuitable to prove facts it purports to prove. This statement must not be admitted pursuant to Rule 87(3)(c). Furthermore, Mr. IENG Sary was afforded no opportunity to confront this witness. The Trial Chamber should therefore give little or no weight to this statement, should it nonetheless find that the statement is admissible pursuant to the criteria set out in Rule 87(3).</p>
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10	Analytical Report	03 June 2010	Analytical Report by Elizabeth DO entitled "Treatment of the Vietnamese Minority in Democratic Kampuchea from a Comparative Perspective"	E190.1.395	Analyses disparities between the treatment of Khmer and Vietnamese people under the DK regime, and describes crimes against the Vietnamese including forced integration, prohibition of Vietnamese language and culture, anti-Vietnamese propaganda, less favourable living conditions, and massacres of Vietnamese communities.	VII. FACTUAL FINDINGS OF JOINT CRIMINAL ENTERPRISE [41:156 to 220], D. TREATMENT OF TARGETED GROUPS [55:205 to 215], Treatment of Vietnamese [196:791 to 841]	The Defence recognizes that the Trial Chamber has previously found that "material such as analytical reports, books, documentary films, and media articles may be relevant and will not be excluded as a category" (E185, para. 21(5)). However, the Defence submits that analytical reports cannot be accepted at face value as being accurate or objective, especially when these reports may have been prepared by organizations which had an agenda to present a particular version of the events or even to formulate disinformation. Simply, it is virtually impossible to test their validity without, at a minimum, adducing evidence from the author. The report contains information and conclusions not based on direct observation of events. The document is unreliable and unsuitable to prove facts it purports to prove, and it is inadmissible pursuant to Rule 87(3)(c). Further, the author of this document is not presently scheduled to testify in Case 002/01. Because Mr. IENG Sary has not been afforded his absolute right under Rule 84(1) to confront the author of this article, this document is also inadmissible pursuant to Rule 87(3)(d). Should this document be admitted, the Defence submits that limited weight, if any, should be given to it unless the content of the document can be verified or supported through independent indicia. For further argument, <i>see</i> IENG Sary's Objections to the Admissibility of Certain Categories of Documents, 6 September 2011, E114, paras. 1 (Standards for the admission of documentary evidence set by the Establishment Law), 7-9 (Reliability), 11 (Relevance), 18-19 (Reports, articles and non-contemporaneous documents).
11	Book	20 November 1978	Book by SAK Sutsakhan entitled "The Khmer Republic at War and the Final Collapse"	E190.1.403	Describes the Khmer Republic military situation from 1970 until the fall of the regime in 1975, including detailed accounts of the Chenla I and II campaigns.	I. HISTORICAL BACKGROUND [13:18 to 32], V. MILITARY STRUCTURE [33:113 to 149], B. ROLE OF RAK [34:116 to 118], D. COMPOSITION OF THE RAK [36:126 to 135], VI. ARMED CONFLICT [40:150 to 155], C. KHIEU SAMPHAN [284:1126 to 1200], Background [285:1126 to 1130], Roles and Functions [286:1131 to 1152], Other Roles [289:1145 to 1150], Military [289:1146]	The Defence recognizes that the Trial Chamber has previously found that "material such as analytical reports, books, documentary films, and media articles may be relevant and will not be excluded as a category" (E185, para. 21(5)). However, the Defence submits that this book should not be admitted unless its author testifies and is examined by the Defence. Should this document be admitted, the Defence submits that limited weight, if any, should be given to it unless the content of the document can be verified or supported through independent indicia. For further argument, <i>see</i> IENG Sary's Objections to the Admissibility of Certain Categories of Documents, 6 September 2011, E114, paras. 1 (Standards for the admission of documentary evidence set by the Establishment Law), 7-9 (Reliability), 11 (Relevance), 18-19 (Reports, articles and non-contemporaneous documents).

12	Book	2005	Book by Jaya RAMJI and Beth Van SCHAACK entitled "Bringing the Khmer Rouge to Justice"	E190.1.402	Describes various aspects of and issues related to the ECCC process including reparations, amnesty, judicial independence, sources of evidence, the structure of the court, and theories of the case.	I. CREATION OF THE ECCC [9:1to2], II. PROCEDURAL BACKGROUND [9:3 to 17], I. HISTORICAL BACKGROUND [13:18 to 32], III. ADMINISTRATIVE STRUCTURES (NATIONAL) [23:64 to 71]	<p>This book is not relevant to Case 002. It is not about the events at issue from 1975-1979, but is rather about "Bringing the Khmer Rouge to Justice." This book is irrelevant and should be rejected pursuant to Rule 87(3)(a).</p> <p>The Defence recognizes that the Trial Chamber has previously found that "material such as analytical reports, books, documentary films, and media articles may be relevant and will not be excluded as a category" (E185, para. 21(5)). However, the Defence submits that this book should not be admitted unless its authors testify and are examined by the Defence. Should this document be admitted, the Defence submits that limited weight, if any, should be given to it unless the content of the document can be verified or supported through independent indicia. For further argument, <i>see</i> IENG Sary's Objections to the Admissibility of Certain Categories of Documents, 6 September 2011, E114, paras. 1 (Standards for the admission of documentary evidence set by the Establishment Law), 7-9 (Reliability), 11 (Relevance), 18-19 (Reports, articles and non-contemporaneous documents).</p> <p>Finally, this book is only available in English. Unless it is made available in Khmer and French by 4 March 2013, it cannot be considered to have been put before the Chamber (pursuant to E185/1, para. 16, E246/1).</p>
13	Book	2005	Book by P.T. Linh entitled "History of the Combat Operations Department 1945-2000"	E190.1.400	Describes the Vietnam-DK conflict from the Vietnamese perspective, including: origins of the conflict in May 1975; Khmer Rouge purges; mass atrocities in Vietnam; and the development of the conflict through 1991.	V. MILITARY STRUCTURE [33:113 to 149], G. PARTICIPATION OF RAK IN PURGES [39:146 to 149], VI. ARMED CONFLICT [40:150 to 155], VII. FACTUAL FINDINGS OF JOINT CRIMINAL ENTERPRISE [41:156 to 220], C. SECURITY CENTRES AND EXECUTION SITES [47:178 to 204], "Purges" [52:192 to 204], D. TREATMENT OF TARGETED GROUPS [55:205 to 215], Treatment of Vietnamese [196:791 to 841], Crimes committed by the Revolutionary Army of Kampuchea on Vietnamese territory [207:832 to 841]	<p>The Defence recognizes that the Trial Chamber has previously found that "material such as analytical reports, books, documentary films, and media articles may be relevant and will not be excluded as a category" (E185, para. 21(5)). However, the Defence submits that this book should not be admitted unless its authors testify and are examined by the Defence. Should this document be admitted, the Defence submits that limited weight, if any, should be given to it unless the content of the document can be verified or supported through independent indicia. For further argument, <i>see</i> IENG Sary's Objections to the Admissibility of Certain Categories of Documents, 6 September 2011, E114, paras. 1 (Standards for the admission of documentary evidence set by the Establishment Law), 7-9 (Reliability), 11 (Relevance), 18-19 (Reports, articles and non-contemporaneous documents).</p> <p>Finally, this book is not available in Khmer or French. Unless it is made available in Khmer and French by 4 March 2013, it cannot be considered to have been put before the Chamber (pursuant to E185/1, para. 16, E246/1).</p>

14	Book	2009	Book by PHAM Van Tra entitled "Memoirs"	E190.1.401	Describes the Socialist Republic of Vietnam campaign to depose the DK regime, detailing the DK atrocities which motivated Socialist Republic of Vietnam to invade and the structure of Socialist Republic of Vietnam military operations against DK.	I. HISTORICAL BACKGROUND [13:18 to 32], V. MILITARY STRUCTURE [33:113 to 149], B. ROLE OF RAK [34:116 to 118], C. CPK CENTRE MILITARY ORGANS [34:119 to 125], General Staff [35:124 to 125], D. COMPOSITION OF THE RAK [36:126 to 135], The Regular army [36:127], Centre Divisions [36:128 to 132], Zone Armies [37:133], E. COMMUNICATION / REPORTING [37:136 to 142], Communication Between Divisions and Centre [38:137 to 141], F. DISCIPLINE [39:143 to 145], G. PARTICIPATION OF RAK IN PURGES [39:146 to 149], VI. ARMED CONFLICT [40:150 to 155], Treatment of Vietnamese [196:791 to 841]	<p>The Defence recognizes that the Trial Chamber has previously found that "material such as analytical reports, books, documentary films, and media articles may be relevant and will not be excluded as a category" (E185, para. 21(5)). However, the Defence submits that this book should not be admitted unless its authors testify and are examined by the Defence. Should this document be admitted, the Defence submits that limited weight, if any, should be given to it unless the content of the document can be verified or supported through independent indicia. For further argument, <i>see</i> IENG Sary's Objections to the Admissibility of Certain Categories of Documents, 6 September 2011, E114, paras. 1 (Standards for the admission of documentary evidence set by the Establishment Law), 7-9 (Reliability), 11 (Relevance), 18-19 (Reports, articles and non-contemporaneous documents).</p> <p>The book apparently contains memoirs of a Vietnamese soldier. This amounts to a witness statement by an entity external to the ECCC. It therefore enjoys no presumption of reliability (E96/7, para. 29). Unless Mr. IENG Sary is permitted to confront this witness at trial to verify the accuracy of his/her statement, the statement must not be admitted. Should the Trial Chamber nonetheless find that the statement is admissible, it should accord it little or no weight.</p> <p>Only a small portion of this book has been translated into English, and an even much smaller portion has been translated into Khmer and French. It is uncertainty how translating only this selective excerpt may have altered the meaning of the text. The excerpt is therefore unreliable and unsuitable to prove facts it purports to prove, and it is inadmissible pursuant to Rule 87(3)(c).</p>
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15	Book	2010	Book by Margaret SLOCOMB entitled "An Economic History of Cambodia in the Twentieth Century"	E190.1.404	Describes the economic history of Cambodia from 1863 through 2005. The chapter on the DK economy notes that the only consensus among scholars about CPK economic policies is that they failed. The analysis considers demographics, nutrition, health, education, agriculture, industry, foreign trade, and finance, concluding that the CPK policy of autarky could never have succeeded, "no matter what cost in human effort." The roles of KHIEU Samphan alias Haem and IENG Thirith alias Phea are evaluated.	I. HISTORICAL BACKGROUND [13:18 to 32], II. ADMINISTRATIVE STRUCTURES (CENTRE) [16:33 to 63], A. THE COMMUNIST PARTY OF KAMPUCHEA (CPK) [16:33 to 36], D. OFFICES OF "'870'" [20:48 to 61], E. MINISTRIES (GOVERNMENT) OF DEMOCRATIC KAMPUCHEA [23:62 to 63], VII. FACTUAL FINDINGS OF JOINT CRIMINAL ENTERPRISE [41:156 to 220], A. MOVEMENT OF THE POPULATION [42:160 to 167], B. COOPERATIVES AND WORKSITES [44:168 to 177], C. SECURITY CENTRES AND EXECUTION SITES [47:178 to 204], D. TREATMENT OF TARGETED GROUPS [55:205 to 215], C. KHIEU SAMPHAN [284:1126 to 1200], Roles and Functions [286:1131 to 1152], Ministry of Commerce [288:1142 to 1144], Participation in the Common Purpose [291:1153 to 1199], D. IENG THIRITH [304:1201 to 1298], Roles and Functions [305:1207 to 1226], Minister of Social Affairs [305:1209 to 1221], Participation in the Common Purpose [309:1227to1295]	<p>The Defence recognizes that the Trial Chamber has previously found that "material such as analytical reports, books, documentary films, and media articles may be relevant and will not be excluded as a category" (E185, para. 21(5)). However, the Defence submits that this book should not be admitted unless its authors testify and are examined by the Defence. Should this document be admitted, the Defence submits that limited weight, if any, should be given to it unless the content of the document can be verified or supported through independent indicia. For further argument, <i>see</i> IENG Sary's Objections to the Admissibility of Certain Categories of Documents, 6 September 2011, E114, paras. 1 (Standards for the admission of documentary evidence set by the Establishment Law), 7-9 (Reliability), 11 (Relevance), 18-19 (Reports, articles and non-contemporaneous documents).</p> <p>Finally, this book is not available in Khmer or French. Unless it is made available in Khmer and French by 4 March 2013, it cannot be considered to have been put before the Chamber (pursuant to E185/1, para. 16, E246/1).</p>
16	DK Biography	11 December 1978	Biography of SAY Khon alias Phy	E190.1.1	Biography of the Chairman of Surgery section at Po-6 (6 January Hospital), arrested at Po-6 on 11 December 1978 and executed on 31 December 1978.	S-21 Security Centre [108:415 to 475], Composition of the Incarcerated Population [110:423 to 433], D. IENG THIRITH [304:1201 to 1298], Participation in the Common Purpose [309:1227to1295], Security Centres and Execution Sites [313:1247 to 1287], Knowledge and Implementation of this Policy at the Ministry of Social Affairs [316:1265 to 1272], Links to S-21 through the Ministry of Social Affairs [318:1273 to 1287]	Any biography which is derived from torture-tainted material must not be admitted. Torture-tainted material is, under all its forms and in every circumstance (except against a person accused of torture as evidence that a statement was made), inadmissible in judicial proceedings before the ECCC. All preliminary biographical information and other derivative evidence contained in this document derived from torture-tainted material is inadmissible. Torture-tainted material is not allowed under the law and it is inherently unreliable. The Trial Chamber must reject this document pursuant to Rule 87(3)(d). <i>See</i> Decision on Objections to Documents Proposed to be put before the Chamber on the Co-Prosecutors' Annexes A1-A5 and to Documents Cited in the Paragraphs of the Closing Order Relevant to the First Two Trial Segments of Case 002/01, 9 April 2012, E185, para. 21.

17	DK Commerce Record	14 November 1975	State Commerce Report entitled "Report on Spray, DDT, Antrin and medicine, 29/10/75 to 14/11/75"	E190.1.2	Describes the quantity, expense, and balance of medicines, spray, DDT and Antrin distributed to the Northeast Zone, North Zone and Ministry of Social Affairs.	C. KHIEU SAMPHAN [284:1126 to 1200], Roles and Functions [286:1131 to 1152], D. IENG THIRITH [304:1201 to 1298], Roles and Functions [305:1207 to 1226], Cooperatives and Worksites [310:1235 to 1246], Knowledge and Implementation of this Policy [312:1242 to 1246]	<p>In accordance with Rule 87(3), the Defence objects to the admission of this document unless the OCP can sufficiently demonstrate the authenticity, reliability and relevance of this document by demonstrating who is responsible for the content of this document. Should this document be admitted, the Defence submits that limited weight, if any, should be given to it unless the content of the document can be verified or supported through independent indicia.</p> <p>Further, Mr. IENG Sary has not been afforded the opportunity to confront the author of this document. This document should therefore be found inadmissible pursuant to Rule 87(3)(d). For further argument, <i>see</i> IENG Sary's Objections to the Admissibility of Certain Categories of Documents, 6 September 2011, E114, paras. 1 (Standards for the admission of documentary evidence set by the Establishment Law), 7-9 (Reliability), 11 (Relevance), 18-19 (Reports, articles and non-contemporaneous documents).</p>
18	DK Commerce Record	August 1976	Commerce Document entitled "Medicines from China"	E190.1.3	Report from Ministry of Commerce listing available medicines and distribution to zones, sectors and headquarters	II. ADMINISTRATIVE STRUCTURES (CENTRE) [16:33 to 63], E. MINISTRIES (GOVERNMENT) OF DEMOCRATIC KAMPUCHEA [23:62 to 63], C. KHIEU SAMPHAN [284:1126 to 1200], Ministry of Commerce [288:1142 to 1144], D. IENG THIRITH [304:1201 to 1298], Minister of Social Affairs [305:1209 to 1221]	<p>In accordance with Rule 87(3), the Defence objects to the admission of this document unless the OCP can sufficiently demonstrate the authenticity, reliability and relevance of this document by demonstrating who is responsible for the content of this document. Should this document be admitted, the Defence submits that limited weight, if any, should be given to it unless the content of the document can be verified or supported through independent indicia.</p> <p>Further, Mr. IENG Sary has not been afforded the opportunity to confront the author of this document. This document should therefore be found inadmissible pursuant to Rule 87(3)(d). For further argument, <i>see</i> IENG Sary's Objections to the Admissibility of Certain Categories of Documents, 6 September 2011, E114, paras. 1 (Standards for the admission of documentary evidence set by the Establishment Law), 7-9 (Reliability), 11 (Relevance), 18-19 (Reports, articles and non-contemporaneous documents).</p>
19	DK Commerce Record	22 December 1976	Price listing for medicine on Hong Kong market	E190.1.4	Contains numerous items and their prices on the market in Hong Kong.	II. ADMINISTRATIVE STRUCTURES (CENTRE) [16:33 to 63], E. MINISTRIES (GOVERNMENT) OF DEMOCRATIC KAMPUCHEA [23:62 to 63], D. IENG THIRITH [304:1201 to 1298], Roles and Functions [305:1207 to 1226], Minister of Social Affairs [305:1209 to 1221]	<p>In accordance with Rule 87(3), the Defence objects to the admission of this document unless the OCP can sufficiently demonstrate the authenticity, reliability and relevance of this document by demonstrating who is responsible for the content of this document. Should this document be admitted, the Defence submits that limited weight, if any, should be given to it unless the content of the document can be verified or supported through independent indicia.</p> <p>Further, Mr. IENG Sary has not been afforded the opportunity to confront the author of this document. This document should therefore be found inadmissible pursuant to Rule 87(3)(d). For further argument, <i>see</i> IENG Sary's Objections to the Admissibility of Certain Categories of Documents, 6 September 2011, E114, paras. 1 (Standards for the admission of documentary evidence set by the Establishment Law), 7-9 (Reliability), 11 (Relevance), 18-19 (Reports, articles and non-contemporaneous documents).</p>

20	DK Commerce Record	06 March 1977	Price list sent from Chinese company to Khmer Foreign Trading company (FORTRA)	E190.1.5	Describes price of items from a Chinese machine firm to Khmer Foreign Trading company (FORTRA) dated 01 March 1977. Bears annotation on first page: "already reported to Brother Hem and asked for his comments," dated 06-03-1977 and signed.	II. ADMINISTRATIVE STRUCTURES (CENTRE) [16:33 to 63], E. MINISTRIES (GOVERNMENT) OF DEMOCRATIC KAMPUCHEA [23:62 to 63], IV. COMMUNICATION STRUCTURE [25:72 to 112], C. KHIEU SAMPHAN [284:1126 to 1200], Roles and Functions [286:1131 to 1152], Ministry of Commerce [288:1142 to 1144]	<p>In accordance with Rule 87(3), the Defence objects to the admission of this document unless the OCP can sufficiently demonstrate the authenticity, reliability and relevance of this document by demonstrating who is responsible for the content of this document. Should this document be admitted, the Defence submits that limited weight, if any, should be given to it unless the content of the document can be verified or supported through independent indicia.</p> <p>Further, Mr. IENG Sary has not been afforded the opportunity to confront the author of this document. This document should therefore be found inadmissible pursuant to Rule 87(3)(d). For further argument, <i>see</i> IENG Sary's Objections to the Admissibility of Certain Categories of Documents, 6 September 2011, E114, paras. 1 (Standards for the admission of documentary evidence set by the Establishment Law), 7-9 (Reliability), 11 (Relevance), 18-19 (Reports, articles and non-contemporaneous documents).</p>
21	DK Commerce Record	07 June 1977	Report from Committee of Warehouse Ministry	E190.1.6	Weekly import/export report for the first week of June 1977, which describes statistics of rice & unhusked rice remaining in the warehouse, signed by Comrade Roeung, Committee of Warehouse Ministry. Bears annotation on upper left hand corner by VAN Rith signed and dated 09 June [1977].	IV. COMMUNICATION STRUCTURE [25:72 to 112], C. KHIEU SAMPHAN [284:1126 to 1200], Roles and Functions [286:1131 to 1152], Ministry of Commerce [288:1142 to 1144], Participation in the Common Purpose [291:1153 to 1199], Cooperatives and Worksites [294:1164 to 1171]	<p>In accordance with Rule 87(3), the Defence objects to the admission of this document unless the OCP can sufficiently demonstrate the authenticity, reliability and relevance of this document by demonstrating who is responsible for the content of this document. Should this document be admitted, the Defence submits that limited weight, if any, should be given to it unless the content of the document can be verified or supported through independent indicia.</p> <p>Further, Mr. IENG Sary has not been afforded the opportunity to confront the author of this document. This document should therefore be found inadmissible pursuant to Rule 87(3)(d). For further argument, <i>see</i> IENG Sary's Objections to the Admissibility of Certain Categories of Documents, 6 September 2011, E114, paras. 1 (Standards for the admission of documentary evidence set by the Establishment Law), 7-9 (Reliability), 11 (Relevance), 18-19 (Reports, articles and non-contemporaneous documents).</p>
22	DK Commerce Record	04 November 1978	Cover page of a communication entitled "Material contracted with China during the periods 1-30/6/78, 1-31/08/76 and 1-30/10/76"	E190.1.7	Cover sheet of report that lists merchandise contracted for purchase from China in June, August and October 1978. Bears annotations by VAN Rith alias Reut with dates on each page, copied to Brother Hem and PENH Thuok alias VON Vet.	II. ADMINISTRATIVE STRUCTURES (CENTRE) [16:33 to 63], E. MINISTRIES (GOVERNMENT) OF DEMOCRATIC KAMPUCHEA [23:62 to 63], IV. COMMUNICATION STRUCTURE [25:72 to 112], C. KHIEU SAMPHAN [284:1126 to 1200], Roles and Functions [286:1131 to 1152], Ministry of Commerce [288:1142 to 1144]	<p>In accordance with Rule 87(3), the Defence objects to the admission of this document unless the OCP can sufficiently demonstrate the authenticity, reliability and relevance of this document by demonstrating who is responsible for the content of this document. Should this document be admitted, the Defence submits that limited weight, if any, should be given to it unless the content of the document can be verified or supported through independent indicia.</p> <p>Further, Mr. IENG Sary has not been afforded the opportunity to confront the author of this document. This document should therefore be found inadmissible pursuant to Rule 87(3)(d). For further argument, <i>see</i> IENG Sary's Objections to the Admissibility of Certain Categories of Documents, 6 September 2011, E114, paras. 1 (Standards for the admission of documentary evidence set by the Establishment Law), 7-9 (Reliability), 11 (Relevance), 18-19 (Reports, articles and non-contemporaneous documents).</p>

23	DK Commerce Record	23 November 1978	List of goods received from China on 23-11-1978	E190.1.8	Describes merchandise received from China which arrived at Kampong Som Port on 23 November 1978. Bears annotation: "sent to Brother Hem Vorn and comrade Roeung (no oil) & comrade Yan (relevant to oil)" 28 November [1978]."	II. ADMINISTRATIVE STRUCTURES (CENTRE) [16:33 to 63], E. MINISTRIES (GOVERNMENT) OF DEMOCRATIC KAMPUCHEA [23:62 to 63], IV. COMMUNICATION STRUCTURE [25:72 to 112], C. KHIEU SAMPHAN [284:1126 to 1200], Roles and Functions [286:1131 to 1152], Ministry of Commerce [288:1142 to 1144]	<p>In accordance with Rule 87(3), the Defence objects to the admission of this document unless the OCP can sufficiently demonstrate the authenticity, reliability and relevance of this document by demonstrating who is responsible for the content of this document. Should this document be admitted, the Defence submits that limited weight, if any, should be given to it unless the content of the document can be verified or supported through independent indicia.</p> <p>Further, Mr. IENG Sary has not been afforded the opportunity to confront the author of this document. This document should therefore be found inadmissible pursuant to Rule 87(3)(d). For further argument, <i>see</i> IENG Sary's Objections to the Admissibility of Certain Categories of Documents, 6 September 2011, E114, paras. 1 (Standards for the admission of documentary evidence set by the Establishment Law), 7-9 (Reliability), 11 (Relevance), 18-19 (Reports, articles and non-contemporaneous documents).</p>
24	Int'l Communication	24 April 1975	International Media Report by Herald Tribune entitled "Thais Reinforce Cambodian Border Force"	E190.1.298	Describes KHIEU Samphan alias Haem as commander of the Khmer Rouge armed forces delivering a speech that was broadcasted on Phnom Penh radio.	VII. FACTUAL FINDINGS OF JOINT CRIMINAL ENTERPRISE [41:156 to 220], A. MOVEMENT OF THE POPULATION [42:160 to 167], C. KHIEU SAMPHAN [284:1126 to 1200], Roles and Functions [286:1131 to 1152]	<p>The Defence recognizes that the Trial Chamber has previously found that "material such as analytical reports, books, documentary films, and media articles may be relevant and will not be excluded as a category" (E185, para. 21(5)). However, the Defence submits that media articles cannot be accepted at face value as being accurate or objective, especially when the journalists may have been engaged by governments to present a particular version of the events or even to formulate disinformation. Simply, it is virtually impossible to test the validity of media articles without, at a minimum, adducing evidence from the author. It is impossible to verify the reliability of the reporting contained herein. The article contains information and conclusions not based on direct observation of events. The document is unreliable and unsuitable to prove facts it purports to prove, and it is inadmissible pursuant to Rule 87(3)(c). Further, the author of this document is not presently scheduled to testify in Case 002/01. Because Mr. IENG Sary has not been afforded his absolute right under Rule 84(1) to confront the author of this article, this document is also inadmissible pursuant to Rule 87(3)(d). Should this document be admitted, the Defence submits that limited weight, if any, should be given to it unless the content of the document can be verified or supported through independent indicia. For further argument, <i>see</i> IENG Sary's Objections to the Admissibility of Certain Categories of Documents, 6 September 2011, E114, paras. 1 (Standards for the admission of documentary evidence set by the Establishment Law), 7-9 (Reliability), 11 (Relevance), 18-19 (Reports, articles and non-contemporaneous documents).</p>

25	Int'l Media Report	01 June 1972	International Media Report entitled "The Cambodian Liberation Forces: A Political and Economic Doctrine" (Indochina Chronicle)	E190.1.299	Contains three articles dealing with the insurgency in Cambodia in 1972; covers topics such as FUNK policies regarding enemies and the economy; KHIEU Samphan alias Haem's role in the FUNK; KHIEU Samphan alias Haem's PhD thesis and its relationship with FUNK policies; organisation and functioning of Khmer Rouge forces.	I. HISTORICAL BACKGROUND [13:18 to 32], II. ADMINISTRATIVE STRUCTURES (CENTRE) [16:33 to 63], A. THE COMMUNIST PARTY OF KAMPUCHEA (CPK) [16:33 to 36], VII. FACTUAL FINDINGS OF JOINT CRIMINAL ENTERPRISE [41:156 to 220], A. MOVEMENT OF THE POPULATION [42:160 to 167], C. SECURITY CENTRES AND EXECUTION SITES [47:178 to 204], C. KHIEU SAMPHAN [284:1126 to 1200], Background [285:1126 to 1130], Participation in the Common Purpose [291:1153 to 1199], Movement of the Population [291:1152 to 1163], Cooperatives and Worksites [294:1164 to 1171]	<p>The Defence recognizes that the Trial Chamber has previously found that "material such as analytical reports, books, documentary films, and media articles may be relevant and will not be excluded as a category" (E185, para. 21(5)). However, the Defence submits that media articles cannot be accepted at face value as being accurate or objective, especially when the journalists may have been engaged by governments to present a particular version of the events or even to formulate disinformation. Simply, it is virtually impossible to test the validity of media articles without, at a minimum, adducing evidence from the author. It is impossible to verify the reliability of the reporting contained herein. The article contains information and conclusions not based on direct observation of events. The document is unreliable and unsuitable to prove facts it purports to prove, and it is inadmissible pursuant to Rule 87(3)(c). Further, the author of this document is not presently scheduled to testify in Case 002/01. Because Mr. IENG Sary has not been afforded his absolute right under Rule 84(1) to confront the author of this article, this document is also inadmissible pursuant to Rule 87(3)(d). Should this document be admitted, the Defence submits that limited weight, if any, should be given to it unless the content of the document can be verified or supported through independent indicia. For further argument, <i>see</i> IENG Sary's Objections to the Admissibility of Certain Categories of Documents, 6 September 2011, E114, paras. 1 (Standards for the admission of documentary evidence set by the Establishment Law), 7-9 (Reliability), 11 (Relevance), 18-19 (Reports, articles and non-contemporaneous documents).</p> <p>This document is dated 1 June 1972 and is not relevant to the proceedings in Case 002. The Trial Chamber should reject this document pursuant to Rule 87(3)(a). The Trial Chamber has previously stated that evidence falling outside the temporal jurisdiction of the ECCC may be admitted where relevant to establishing background or context. <i>See</i> Decision on Objections to Documents Proposed to be put before the Chamber on the Co-Prosecutors' Annexes A1-A5 and to Documents Cited in the Paragraphs of the Closing Order Relevant to the First Two Trial Segments of Case 002/01, 9 April 2012, E185, para. 29. This document is not necessary for background or context.</p>
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26	Int'l Media Report	14 April 1975	International Media Report entitled "Sihanouk silent as insurgents wait outside Phnom Penh" (The Guardian)	E190.1.300	Describes Khmer Rouge's intention to kill seven traitors including LONG Boret, SIRIK Matak, and others.	VII. FACTUAL FINDINGS OF JOINT CRIMINAL ENTERPRISE [41:156 to 220], D. TREATMENT OF TARGETED GROUPS [55:205 to 215]	The Defence recognizes that the Trial Chamber has previously found that "material such as analytical reports, books, documentary films, and media articles may be relevant and will not be excluded as a category" (E185, para. 21(5)). However, the Defence submits that media articles cannot be accepted at face value as being accurate or objective, especially when the journalists may have been engaged by governments to present a particular version of the events or even to formulate disinformation. Simply, it is virtually impossible to test the validity of media articles without, at a minimum, adducing evidence from the author. It is impossible to verify the reliability of the reporting contained herein. The article contains information and conclusions not based on direct observation of events. The document is unreliable and unsuitable to prove facts it purports to prove, and it is inadmissible pursuant to Rule 87(3)(c). Further, the author of this document is not presently scheduled to testify in Case 002/01. Because Mr. IENG Sary has not been afforded his absolute right under Rule 84(1) to confront the author of this article, this document is also inadmissible pursuant to Rule 87(3)(d). Should this document be admitted, the Defence submits that limited weight, if any, should be given to it unless the content of the document can be verified or supported through independent indicia. For further argument, <i>see</i> IENG Sary's Objections to the Admissibility of Certain Categories of Documents, 6 September 2011, E114, paras. 1 (Standards for the admission of documentary evidence set by the Establishment Law), 7-9 (Reliability), 11 (Relevance), 18-19 (Reports, articles and non-contemporaneous documents).
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27	Int'l Media Report	19 April 1975	International Media Report entitled "End of the Cambodian Illusion" (The Guardian Weekly)	E190.1.301	Provides biographical details on KHIEU Samphan alias Haem, notably his senior role in the Khmer Rouge movement, and recounts the history of the decline of LON Nol's regime.	I. HISTORICAL BACKGROUND [13:18 to 32], C. KHIEU SAMPHAN [284:1126 to 1200], Background [285:1126 to 1130]	The Defence recognizes that the Trial Chamber has previously found that "material such as analytical reports, books, documentary films, and media articles may be relevant and will not be excluded as a category" (E185, para. 21(5)). However, the Defence submits that media articles cannot be accepted at face value as being accurate or objective, especially when the journalists may have been engaged by governments to present a particular version of the events or even to formulate disinformation. Simply, it is virtually impossible to test the validity of media articles without, at a minimum, adducing evidence from the author. It is impossible to verify the reliability of the reporting contained herein. The article contains information and conclusions not based on direct observation of events. The document is unreliable and unsuitable to prove facts it purports to prove, and it is inadmissible pursuant to Rule 87(3)(c). Further, the author of this document is not presently scheduled to testify in Case 002/01. Because Mr. IENG Sary has not been afforded his absolute right under Rule 84(1) to confront the author of this article, this document is also inadmissible pursuant to Rule 87(3)(d). Should this document be admitted, the Defence submits that limited weight, if any, should be given to it unless the content of the document can be verified or supported through independent indicia. For further argument, <i>see</i> IENG Sary's Objections to the Admissibility of Certain Categories of Documents, 6 September 2011, E114, paras. 1 (Standards for the admission of documentary evidence set by the Establishment Law), 7-9 (Reliability), 11 (Relevance), 18-19 (Reports, articles and non-contemporaneous documents).
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28	Int'l Media Report	28 April 1975	International Media Report entitled "The Last Days of Phnom Penh" and "KHIEU Samphan: Out of the Jungle"	E190.1.302	Media article describing the final battle for Phnom Penh, and its immediate aftermath; gives biographical details on KHIEU Samphan alias Haem and his role in the new government.	Movement of the Population from Phnom Penh (Phase 1) [60:221 to 261], C. KHIEU SAMPHAN [284:1126 to 1200], Background [285:1126 to 1130], Roles and Functions [286:1131 to 1152]	The Defence recognizes that the Trial Chamber has previously found that "material such as analytical reports, books, documentary films, and media articles may be relevant and will not be excluded as a category" (E185, para. 21(5)). However, the Defence submits that media articles cannot be accepted at face value as being accurate or objective, especially when the journalists may have been engaged by governments to present a particular version of the events or even to formulate disinformation. Simply, it is virtually impossible to test the validity of media articles without, at a minimum, adducing evidence from the author. It is impossible to verify the reliability of the reporting contained herein. The article contains information and conclusions not based on direct observation of events. The document is unreliable and unsuitable to prove facts it purports to prove, and it is inadmissible pursuant to Rule 87(3)(c). Further, the author of this document is not presently scheduled to testify in Case 002/01. Because Mr. IENG Sary has not been afforded his absolute right under Rule 84(1) to confront the author of this article, this document is also inadmissible pursuant to Rule 87(3)(d). Should this document be admitted, the Defence submits that limited weight, if any, should be given to it unless the content of the document can be verified or supported through independent indicia. For further argument, <i>see</i> IENG Sary's Objections to the Admissibility of Certain Categories of Documents, 6 September 2011, E114, paras. 1 (Standards for the admission of documentary evidence set by the Establishment Law), 7-9 (Reliability), 11 (Relevance), 18-19 (Reports, articles and non-contemporaneous documents).
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29	Int'l Media Report	05 May 1975	International Media Report entitled "Executions of Cambodian Officers, Wives Reported" (Los Angeles Times)	E190.1.303	Details US reaction to reports of executions of former Khmer Republic officials and their wives.	VII. FACTUAL FINDINGS OF JOINT CRIMINAL ENTERPRISE [41:156 to 220], D. TREATMENT OF TARGETED GROUPS [55:205 to 215]	The Defence recognizes that the Trial Chamber has previously found that "material such as analytical reports, books, documentary films, and media articles may be relevant and will not be excluded as a category" (E185, para. 21(5)). However, the Defence submits that media articles cannot be accepted at face value as being accurate or objective, especially when the journalists may have been engaged by governments to present a particular version of the events or even to formulate disinformation. Simply, it is virtually impossible to test the validity of media articles without, at a minimum, adducing evidence from the author. It is impossible to verify the reliability of the reporting contained herein. The article contains information and conclusions not based on direct observation of events. The document is unreliable and unsuitable to prove facts it purports to prove, and it is inadmissible pursuant to Rule 87(3)(c). Further, the author of this document is not presently scheduled to testify in Case 002/01. Because Mr. IENG Sary has not been afforded his absolute right under Rule 84(1) to confront the author of this article, this document is also inadmissible pursuant to Rule 87(3)(d). Should this document be admitted, the Defence submits that limited weight, if any, should be given to it unless the content of the document can be verified or supported through independent indicia. For further argument, <i>see</i> IENG Sary's Objections to the Admissibility of Certain Categories of Documents, 6 September 2011, E114, paras. 1 (Standards for the admission of documentary evidence set by the Establishment Law), 7-9 (Reliability), 11 (Relevance), 18-19 (Reports, articles and non-contemporaneous documents).
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30	Int'l Media Report	10 May 1975	International Media Report entitled "The Murder of Phnom Penh" (Chicago Tribune)	E190.1.304	Describes forced evacuation of Phnom Penh and execution of former Khmer Republic officials.	VII. FACTUAL FINDINGS OF JOINT CRIMINAL ENTERPRISE [41:156 to 220], D. TREATMENT OF TARGETED GROUPS [55:205 to 215], Movement of the Population from Phnom Penh (Phase 1) [60:221 to 261]	The Defence recognizes that the Trial Chamber has previously found that "material such as analytical reports, books, documentary films, and media articles may be relevant and will not be excluded as a category" (E185, para. 21(5)). However, the Defence submits that media articles cannot be accepted at face value as being accurate or objective, especially when the journalists may have been engaged by governments to present a particular version of the events or even to formulate disinformation. Simply, it is virtually impossible to test the validity of media articles without, at a minimum, adducing evidence from the author. It is impossible to verify the reliability of the reporting contained herein. The article contains information and conclusions not based on direct observation of events. The document is unreliable and unsuitable to prove facts it purports to prove, and it is inadmissible pursuant to Rule 87(3)(c). Further, the author of this document is not presently scheduled to testify in Case 002/01. Because Mr. IENG Sary has not been afforded his absolute right under Rule 84(1) to confront the author of this article, this document is also inadmissible pursuant to Rule 87(3)(d). Should this document be admitted, the Defence submits that limited weight, if any, should be given to it unless the content of the document can be verified or supported through independent indicia. For further argument, <i>see</i> IENG Sary's Objections to the Admissibility of Certain Categories of Documents, 6 September 2011, E114, paras. 1 (Standards for the admission of documentary evidence set by the Establishment Law), 7-9 (Reliability), 11 (Relevance), 18-19 (Reports, articles and non-contemporaneous documents).
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31	Int'l Media Report	12 May 1975	International Media Report entitled "Cambodia's Rulers Stress China Ties" (New York Times)	E190.1.305	Describes a Phnom Penh Radio broadcast stating that seven traitors would be executed while other government officials would be pardoned.	VII. FACTUAL FINDINGS OF JOINT CRIMINAL ENTERPRISE [41:156 to 220], D. TREATMENT OF TARGETED GROUPS [55:205 to 215]	The Defence recognizes that the Trial Chamber has previously found that "material such as analytical reports, books, documentary films, and media articles may be relevant and will not be excluded as a category" (E185, para. 21(5)). However, the Defence submits that media articles cannot be accepted at face value as being accurate or objective, especially when the journalists may have been engaged by governments to present a particular version of the events or even to formulate disinformation. Simply, it is virtually impossible to test the validity of media articles without, at a minimum, adducing evidence from the author. It is impossible to verify the reliability of the reporting contained herein. The article contains information and conclusions not based on direct observation of events. The document is unreliable and unsuitable to prove facts it purports to prove, and it is inadmissible pursuant to Rule 87(3)(c). Further, the author of this document is not presently scheduled to testify in Case 002/01. Because Mr. IENG Sary has not been afforded his absolute right under Rule 84(1) to confront the author of this article, this document is also inadmissible pursuant to Rule 87(3)(d). Should this document be admitted, the Defence submits that limited weight, if any, should be given to it unless the content of the document can be verified or supported through independent indicia. For further argument, <i>see</i> IENG Sary's Objections to the Admissibility of Certain Categories of Documents, 6 September 2011, E114, paras. 1 (Standards for the admission of documentary evidence set by the Establishment Law), 7-9 (Reliability), 11 (Relevance), 18-19 (Reports, articles and non-contemporaneous documents).
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32	Int'l Media Report	14 May 1975	International Media Report entitled "Kissinger Sees Atrocity In Events in Cambodia" (New York Times)	E190.1.306	Describes forced evacuation of Phnom Penh and execution of Khmer Republic officials and their wives.	VII. FACTUAL FINDINGS OF JOINT CRIMINAL ENTERPRISE [41:156 to 220], D. TREATMENT OF TARGETED GROUPS [55:205 to 215], Movement of the Population from Phnom Penh (Phase 1) [60:221 to 261]	The Defence recognizes that the Trial Chamber has previously found that "material such as analytical reports, books, documentary films, and media articles may be relevant and will not be excluded as a category" (E185, para. 21(5)). However, the Defence submits that media articles cannot be accepted at face value as being accurate or objective, especially when the journalists may have been engaged by governments to present a particular version of the events or even to formulate disinformation. Simply, it is virtually impossible to test the validity of media articles without, at a minimum, adducing evidence from the author. It is impossible to verify the reliability of the reporting contained herein. The article contains information and conclusions not based on direct observation of events. The document is unreliable and unsuitable to prove facts it purports to prove, and it is inadmissible pursuant to Rule 87(3)(c). Further, the author of this document is not presently scheduled to testify in Case 002/01. Because Mr. IENG Sary has not been afforded his absolute right under Rule 84(1) to confront the author of this article, this document is also inadmissible pursuant to Rule 87(3)(d). Should this document be admitted, the Defence submits that limited weight, if any, should be given to it unless the content of the document can be verified or supported through independent indicia. For further argument, <i>see</i> IENG Sary's Objections to the Admissibility of Certain Categories of Documents, 6 September 2011, E114, paras. 1 (Standards for the admission of documentary evidence set by the Establishment Law), 7-9 (Reliability), 11 (Relevance), 18-19 (Reports, articles and non-contemporaneous documents).
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33	Int'l Media Report	19 May 1975	International Media Report entitled "Cambodia's 'Purification'" (Newsweek)	E190.1.307	Details forced evacuation from the cities to the countryside, arbitrary killings, and enlistment of child soldiers.	VII. FACTUAL FINDINGS OF JOINT CRIMINAL ENTERPRISE [41:156 to 220], C. SECURITY CENTRES AND EXECUTION SITES [47:178 to 204], Movement of the Population from Phnom Penh (Phase 1) [60:221 to 261]	The Defence recognizes that the Trial Chamber has previously found that "material such as analytical reports, books, documentary films, and media articles may be relevant and will not be excluded as a category" (E185, para. 21(5)). However, the Defence submits that media articles cannot be accepted at face value as being accurate or objective, especially when the journalists may have been engaged by governments to present a particular version of the events or even to formulate disinformation. Simply, it is virtually impossible to test the validity of media articles without, at a minimum, adducing evidence from the author. It is impossible to verify the reliability of the reporting contained herein. The article contains information and conclusions not based on direct observation of events. The document is unreliable and unsuitable to prove facts it purports to prove, and it is inadmissible pursuant to Rule 87(3)(c). Further, the author of this document is not presently scheduled to testify in Case 002/01. Because Mr. IENG Sary has not been afforded his absolute right under Rule 84(1) to confront the author of this article, this document is also inadmissible pursuant to Rule 87(3)(d). Should this document be admitted, the Defence submits that limited weight, if any, should be given to it unless the content of the document can be verified or supported through independent indicia. For further argument, <i>see</i> IENG Sary's Objections to the Admissibility of Certain Categories of Documents, 6 September 2011, E114, paras. 1 (Standards for the admission of documentary evidence set by the Establishment Law), 7-9 (Reliability), 11 (Relevance), 18-19 (Reports, articles and non-contemporaneous documents).
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34	Int'l Media Report	19 May 1975	International Media Report entitled "Long March from Phnom-Penh" (Time Magazine)	E190.1.308	Describes the evacuation of Phnom Penh, including deaths, lack of food and water.	VII. FACTUAL FINDINGS OF JOINT CRIMINAL ENTERPRISE [41:156 to 220], A. MOVEMENT OF THE POPULATION [42:160 to 167]	The Defence recognizes that the Trial Chamber has previously found that "material such as analytical reports, books, documentary films, and media articles may be relevant and will not be excluded as a category" (E185, para. 21(5)). However, the Defence submits that media articles cannot be accepted at face value as being accurate or objective, especially when the journalists may have been engaged by governments to present a particular version of the events or even to formulate disinformation. Simply, it is virtually impossible to test the validity of media articles without, at a minimum, adducing evidence from the author. It is impossible to verify the reliability of the reporting contained herein. The article contains information and conclusions not based on direct observation of events. The document is unreliable and unsuitable to prove facts it purports to prove, and it is inadmissible pursuant to Rule 87(3)(c). Further, the author of this document is not presently scheduled to testify in Case 002/01. Because Mr. IENG Sary has not been afforded his absolute right under Rule 84(1) to confront the author of this article, this document is also inadmissible pursuant to Rule 87(3)(d). Should this document be admitted, the Defence submits that limited weight, if any, should be given to it unless the content of the document can be verified or supported through independent indicia. For further argument, <i>see</i> IENG Sary's Objections to the Admissibility of Certain Categories of Documents, 6 September 2011, E114, paras. 1 (Standards for the admission of documentary evidence set by the Establishment Law), 7-9 (Reliability), 11 (Relevance), 18-19 (Reports, articles and non-contemporaneous documents).
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35	Int'l Media Report	25 June 1975	International Media Report entitled "Cambodian Describes Red Terror" (Chicago Tribune)	E190.1.310	Describes deaths from forced evacuation of Phnom Penh; details people being executed or dying from starvation or illness. Details senior role of KHIEU Samphan alias Haem.	VII. FACTUAL FINDINGS OF JOINT CRIMINAL ENTERPRISE [41:156 to 220], D. TREATMENT OF TARGETED GROUPS [55:205 to 215], Movement of the Population from Phnom Penh (Phase 1) [60:221 to 261], C. KHIEU SAMPHAN [284:1126 to 1200], Background [285:1126 to 1130], Roles and Functions [286:1131 to 1152]	The Defence recognizes that the Trial Chamber has previously found that "material such as analytical reports, books, documentary films, and media articles may be relevant and will not be excluded as a category" (E185, para. 21(5)). However, the Defence submits that media articles cannot be accepted at face value as being accurate or objective, especially when the journalists may have been engaged by governments to present a particular version of the events or even to formulate disinformation. Simply, it is virtually impossible to test the validity of media articles without, at a minimum, adducing evidence from the author. It is impossible to verify the reliability of the reporting contained herein. The article contains information and conclusions not based on direct observation of events. The document is unreliable and unsuitable to prove facts it purports to prove, and it is inadmissible pursuant to Rule 87(3)(c). Further, the author of this document is not presently scheduled to testify in Case 002/01. Because Mr. IENG Sary has not been afforded his absolute right under Rule 84(1) to confront the author of this article, this document is also inadmissible pursuant to Rule 87(3)(d). Should this document be admitted, the Defence submits that limited weight, if any, should be given to it unless the content of the document can be verified or supported through independent indicia. For further argument, <i>see</i> IENG Sary's Objections to the Admissibility of Certain Categories of Documents, 6 September 2011, E114, paras. 1 (Standards for the admission of documentary evidence set by the Establishment Law), 7-9 (Reliability), 11 (Relevance), 18-19 (Reports, articles and non-contemporaneous documents).
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36	Int'l Media Report	25 June 1975	International Media Report entitled "Cambodian Toll High - Kissinger" (Los Angeles Times)	E190.1.309	Describes Henry Kissinger's assessment of a high number of Casualties in DK. Also details forced evacuation of Phnom Penh.	VII. FACTUAL FINDINGS OF JOINT CRIMINAL ENTERPRISE [41:156 to 220], A. MOVEMENT OF THE POPULATION [42:160 to 167], C. SECURITY CENTRES AND EXECUTION SITES [47:178 to 204]	The Defence recognizes that the Trial Chamber has previously found that "material such as analytical reports, books, documentary films, and media articles may be relevant and will not be excluded as a category" (E185, para. 21(5)). However, the Defence submits that media articles cannot be accepted at face value as being accurate or objective, especially when the journalists may have been engaged by governments to present a particular version of the events or even to formulate disinformation. Simply, it is virtually impossible to test the validity of media articles without, at a minimum, adducing evidence from the author. It is impossible to verify the reliability of the reporting contained herein. The article contains information and conclusions not based on direct observation of events. The document is unreliable and unsuitable to prove facts it purports to prove, and it is inadmissible pursuant to Rule 87(3)(c). Further, the author of this document is not presently scheduled to testify in Case 002/01. Because Mr. IENG Sary has not been afforded his absolute right under Rule 84(1) to confront the author of this article, this document is also inadmissible pursuant to Rule 87(3)(d). Should this document be admitted, the Defence submits that limited weight, if any, should be given to it unless the content of the document can be verified or supported through independent indicia. For further argument, <i>see</i> IENG Sary's Objections to the Admissibility of Certain Categories of Documents, 6 September 2011, E114, paras. 1 (Standards for the admission of documentary evidence set by the Establishment Law), 7-9 (Reliability), 11 (Relevance), 18-19 (Reports, articles and non-contemporaneous documents).
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37	Int'l Media Report	25 June 1975	International Media Report entitled "Henry Tells of Cambodia Agony" (Chicago Tribune)	E190.1.311	Describes US Secretary of State Henry Kissinger's assessment of a substantial death toll in DK; mentions border clashes; starvation and massive killings following the evacuation of the cities.	VI. ARMED CONFLICT [40:150 to 155], VII. FACTUAL FINDINGS OF JOINT CRIMINAL ENTERPRISE [41:156 to 220], D. TREATMENT OF TARGETED GROUPS [55:205 to 215], Movement of the Population from Phnom Penh (Phase 1) [60:221 to 261]	The Defence recognizes that the Trial Chamber has previously found that "material such as analytical reports, books, documentary films, and media articles may be relevant and will not be excluded as a category" (E185, para. 21(5)). However, the Defence submits that media articles cannot be accepted at face value as being accurate or objective, especially when the journalists may have been engaged by governments to present a particular version of the events or even to formulate disinformation. Simply, it is virtually impossible to test the validity of media articles without, at a minimum, adducing evidence from the author. It is impossible to verify the reliability of the reporting contained herein. The article contains information and conclusions not based on direct observation of events. The document is unreliable and unsuitable to prove facts it purports to prove, and it is inadmissible pursuant to Rule 87(3)(c). Further, the author of this document is not presently scheduled to testify in Case 002/01. Because Mr. IENG Sary has not been afforded his absolute right under Rule 84(1) to confront the author of this article, this document is also inadmissible pursuant to Rule 87(3)(d). Should this document be admitted, the Defence submits that limited weight, if any, should be given to it unless the content of the document can be verified or supported through independent indicia. For further argument, <i>see</i> IENG Sary's Objections to the Admissibility of Certain Categories of Documents, 6 September 2011, E114, paras. 1 (Standards for the admission of documentary evidence set by the Establishment Law), 7-9 (Reliability), 11 (Relevance), 18-19 (Reports, articles and non-contemporaneous documents).
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38	Int'l Media Report	16 August 1975 - 17 August 1975	International Media Reports entitled "Khmer Chief May Launch Sihanouk Talk", "Cambodia Leader Arrives in Peking" and "Peking advice to Cambodia on Soviet 'tentacles'" (The Herald Tribune and The London Times)	E190.1.312	Describes KHIEU Samphan alias Haem as Deputy Premier and Commander in Chief of Khmer Rouge forces, and IENG Sary alias Van as Deputy Premier in charge of Foreign Relations, visiting China in August 1975, possibly discuss with NORODOM Sihanouk. Also describes KHIEU Samphan alias Haem asking China for aid.	B. IENG SARY [250:994 to 1125], Roles and Functions [251:1001 to 1017], Deputy Prime Minister for Foreign Affairs [252:1005 to 1014], Association with Other CPK Senior Leaders [255:1016 to 1017], C. KHIEU SAMPHAN [284:1126 to 1200], Roles and Functions [286:1131 to 1152], Other Roles [289:1145 to 1150], Military [289:1146], Association with Other CPK Leaders [291:1151 to 1152]	The Defence recognizes that the Trial Chamber has previously found that "material such as analytical reports, books, documentary films, and media articles may be relevant and will not be excluded as a category" (E185, para. 21(5)). However, the Defence submits that media articles cannot be accepted at face value as being accurate or objective, especially when the journalists may have been engaged by governments to present a particular version of the events or even to formulate disinformation. Simply, it is virtually impossible to test the validity of media articles without, at a minimum, adducing evidence from the author. It is impossible to verify the reliability of the reporting contained herein. The article contains information and conclusions not based on direct observation of events. The document is unreliable and unsuitable to prove facts it purports to prove, and it is inadmissible pursuant to Rule 87(3)(c). Further, the author of this document is not presently scheduled to testify in Case 002/01. Because Mr. IENG Sary has not been afforded his absolute right under Rule 84(1) to confront the author of this article, this document is also inadmissible pursuant to Rule 87(3)(d). Should this document be admitted, the Defence submits that limited weight, if any, should be given to it unless the content of the document can be verified or supported through independent indicia. For further argument, <i>see</i> IENG Sary's Objections to the Admissibility of Certain Categories of Documents, 6 September 2011, E114, paras. 1 (Standards for the admission of documentary evidence set by the Establishment Law), 7-9 (Reliability), 11 (Relevance), 18-19 (Reports, articles and non-contemporaneous documents).
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39	Int'l Media Report	23 August 1975	International Media Report entitled "Cambodia; News from No Man's Land" (The Economist)	E190.1.313	Describes the forced evacuation of cities including lack of food and medicine.	VII. FACTUAL FINDINGS OF JOINT CRIMINAL ENTERPRISE [41:156 to 220], A. MOVEMENT OF THE POPULATION [42:160 to 167]	The Defence recognizes that the Trial Chamber has previously found that "material such as analytical reports, books, documentary films, and media articles may be relevant and will not be excluded as a category" (E185, para. 21(5)). However, the Defence submits that media articles cannot be accepted at face value as being accurate or objective, especially when the journalists may have been engaged by governments to present a particular version of the events or even to formulate disinformation. Simply, it is virtually impossible to test the validity of media articles without, at a minimum, adducing evidence from the author. It is impossible to verify the reliability of the reporting contained herein. The article contains information and conclusions not based on direct observation of events. The document is unreliable and unsuitable to prove facts it purports to prove, and it is inadmissible pursuant to Rule 87(3)(c). Further, the author of this document is not presently scheduled to testify in Case 002/01. Because Mr. IENG Sary has not been afforded his absolute right under Rule 84(1) to confront the author of this article, this document is also inadmissible pursuant to Rule 87(3)(d). Should this document be admitted, the Defence submits that limited weight, if any, should be given to it unless the content of the document can be verified or supported through independent indicia. For further argument, <i>see</i> IENG Sary's Objections to the Admissibility of Certain Categories of Documents, 6 September 2011, E114, paras. 1 (Standards for the admission of documentary evidence set by the Establishment Law), 7-9 (Reliability), 11 (Relevance), 18-19 (Reports, articles and non-contemporaneous documents).
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40	Int'l Media Report	28 August 1975	International Media Report entitled "2,000 Reportedly Flee Cambodia" (Los Angeles Times)	E190.1.314	Describes escape from DK of 2000 residents of Pailin to Thailand, fleeing forced labour, torture and starvation.	VII. FACTUAL FINDINGS OF JOINT CRIMINAL ENTERPRISE [41:156 to 220], B. COOPERATIVES AND WORKSITES [44:168 to 177]	The Defence recognizes that the Trial Chamber has previously found that "material such as analytical reports, books, documentary films, and media articles may be relevant and will not be excluded as a category" (E185, para. 21(5)). However, the Defence submits that media articles cannot be accepted at face value as being accurate or objective, especially when the journalists may have been engaged by governments to present a particular version of the events or even to formulate disinformation. Simply, it is virtually impossible to test the validity of media articles without, at a minimum, adducing evidence from the author. It is impossible to verify the reliability of the reporting contained herein. The article contains information and conclusions not based on direct observation of events. The document is unreliable and unsuitable to prove facts it purports to prove, and it is inadmissible pursuant to Rule 87(3)(c). Further, the author of this document is not presently scheduled to testify in Case 002/01. Because Mr. IENG Sary has not been afforded his absolute right under Rule 84(1) to confront the author of this article, this document is also inadmissible pursuant to Rule 87(3)(d). Should this document be admitted, the Defence submits that limited weight, if any, should be given to it unless the content of the document can be verified or supported through independent indicia. For further argument, <i>see</i> IENG Sary's Objections to the Admissibility of Certain Categories of Documents, 6 September 2011, E114, paras. 1 (Standards for the admission of documentary evidence set by the Establishment Law), 7-9 (Reliability), 11 (Relevance), 18-19 (Reports, articles and non-contemporaneous documents).
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41	Int'l Media Report	03 October 1975	International Media Report entitled "Real Power Centres Remain Unclear in Indochina States" (International Herald Tribune)	E190.1.315	Describes senior positions of KHIEU Samphan alias Haem and IENG Sary alias Van in DK regime, and states that the leadership was still unknown to the outside world.	B. IENG SARY [250:994 to 1125], Roles and Functions [251:1001 to 1017], Deputy Prime Minister for Foreign Affairs [252:1005 to 1014], C. KHIEU SAMPHAN [284:1126 to 1200], Roles and Functions [286:1131 to 1152]	The Defence recognizes that the Trial Chamber has previously found that "material such as analytical reports, books, documentary films, and media articles may be relevant and will not be excluded as a category" (E185, para. 21(5)). However, the Defence submits that media articles cannot be accepted at face value as being accurate or objective, especially when the journalists may have been engaged by governments to present a particular version of the events or even to formulate disinformation. Simply, it is virtually impossible to test the validity of media articles without, at a minimum, adducing evidence from the author. It is impossible to verify the reliability of the reporting contained herein. The article contains information and conclusions not based on direct observation of events. The document is unreliable and unsuitable to prove facts it purports to prove, and it is inadmissible pursuant to Rule 87(3)(c). Further, the author of this document is not presently scheduled to testify in Case 002/01. Because Mr. IENG Sary has not been afforded his absolute right under Rule 84(1) to confront the author of this article, this document is also inadmissible pursuant to Rule 87(3)(d). Should this document be admitted, the Defence submits that limited weight, if any, should be given to it unless the content of the document can be verified or supported through independent indicia. For further argument, <i>see</i> IENG Sary's Objections to the Admissibility of Certain Categories of Documents, 6 September 2011, E114, paras. 1 (Standards for the admission of documentary evidence set by the Establishment Law), 7-9 (Reliability), 11 (Relevance), 18-19 (Reports, articles and non-contemporaneous documents).
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42	Int'l Media Report	12 October 1975	International Media Report entitled "Phnom Penh Becomes 'Dead City'" (The Times)	E190.1.316	Describes the killing of former Khmer Republic officials, including Long Non, Long Boret, Sirik Matak. Also describes the evacuation of Phnom Penh.	VII. FACTUAL FINDINGS OF JOINT CRIMINAL ENTERPRISE [41:156 to 220], D. TREATMENT OF TARGETED GROUPS [55:205 to 215], Movement of the Population from Phnom Penh (Phase 1) [60:221 to 261]	The Defence recognizes that the Trial Chamber has previously found that "material such as analytical reports, books, documentary films, and media articles may be relevant and will not be excluded as a category" (E185, para. 21(5)). However, the Defence submits that media articles cannot be accepted at face value as being accurate or objective, especially when the journalists may have been engaged by governments to present a particular version of the events or even to formulate disinformation. Simply, it is virtually impossible to test the validity of media articles without, at a minimum, adducing evidence from the author. It is impossible to verify the reliability of the reporting contained herein. The article contains information and conclusions not based on direct observation of events. The document is unreliable and unsuitable to prove facts it purports to prove, and it is inadmissible pursuant to Rule 87(3)(c). Further, the author of this document is not presently scheduled to testify in Case 002/01. Because Mr. IENG Sary has not been afforded his absolute right under Rule 84(1) to confront the author of this article, this document is also inadmissible pursuant to Rule 87(3)(d). Should this document be admitted, the Defence submits that limited weight, if any, should be given to it unless the content of the document can be verified or supported through independent indicia. For further argument, <i>see</i> IENG Sary's Objections to the Admissibility of Certain Categories of Documents, 6 September 2011, E114, paras. 1 (Standards for the admission of documentary evidence set by the Establishment Law), 7-9 (Reliability), 11 (Relevance), 18-19 (Reports, articles and non-contemporaneous documents).
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43	Int'l Media Report	15 October 1975	International Media Report entitled "Cambodia Ex-Leader Says Reds Killed His Brother" (Los Angeles Times)	E190.1.317	Details LON Nol's belief that Khmer Rouge killed his brother, a former Khmer Republic official.	VII. FACTUAL FINDINGS OF JOINT CRIMINAL ENTERPRISE [41:156 to 220], D. TREATMENT OF TARGETED GROUPS [55:205 to 215]	The Defence recognizes that the Trial Chamber has previously found that "material such as analytical reports, books, documentary films, and media articles may be relevant and will not be excluded as a category" (E185, para. 21(5)). However, the Defence submits that media articles cannot be accepted at face value as being accurate or objective, especially when the journalists may have been engaged by governments to present a particular version of the events or even to formulate disinformation. Simply, it is virtually impossible to test the validity of media articles without, at a minimum, adducing evidence from the author. It is impossible to verify the reliability of the reporting contained herein. The article contains information and conclusions not based on direct observation of events. The document is unreliable and unsuitable to prove facts it purports to prove, and it is inadmissible pursuant to Rule 87(3)(c). Further, the author of this document is not presently scheduled to testify in Case 002/01. Because Mr. IENG Sary has not been afforded his absolute right under Rule 84(1) to confront the author of this article, this document is also inadmissible pursuant to Rule 87(3)(d). Should this document be admitted, the Defence submits that limited weight, if any, should be given to it unless the content of the document can be verified or supported through independent indicia. For further argument, <i>see</i> IENG Sary's Objections to the Admissibility of Certain Categories of Documents, 6 September 2011, E114, paras. 1 (Standards for the admission of documentary evidence set by the Establishment Law), 7-9 (Reliability), 11 (Relevance), 18-19 (Reports, articles and non-contemporaneous documents).
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44	Int'l Media Report	02 January 1976	International Media Report entitled "The Khmer Rouge's Iron Grip on Cambodia" (Far Eastern Economic Review)	E190.1.318	Reports accounts of DK refugees in Thailand regarding forced labour, starvation and repression, including that the CPK tried to eliminate officials from the Lon Nol regime and anyone who expressed complaints or doubts. Describes recent forced movement of up to 300,000 evacuees to Battambang.	VII. FACTUAL FINDINGS OF JOINT CRIMINAL ENTERPRISE [41:156 to 220], B. COOPERATIVES AND WORKSITES [44:168 to 177], C. SECURITY CENTRES AND EXECUTION SITES [47:178 to 204], D. TREATMENT OF TARGETED GROUPS [55:205 to 215], "Movement of the Population from the Central (Old North), Southwest, West and East Zones (Phase 2) [69:262 to 282]"	The Defence recognizes that the Trial Chamber has previously found that "material such as analytical reports, books, documentary films, and media articles may be relevant and will not be excluded as a category" (E185, para. 21(5)). However, the Defence submits that media articles cannot be accepted at face value as being accurate or objective, especially when the journalists may have been engaged by governments to present a particular version of the events or even to formulate disinformation. Simply, it is virtually impossible to test the validity of media articles without, at a minimum, adducing evidence from the author. It is impossible to verify the reliability of the reporting contained herein. The article contains information and conclusions not based on direct observation of events. The document is unreliable and unsuitable to prove facts it purports to prove, and it is inadmissible pursuant to Rule 87(3)(c). Further, the author of this document is not presently scheduled to testify in Case 002/01. Because Mr. IENG Sary has not been afforded his absolute right under Rule 84(1) to confront the author of this article, this document is also inadmissible pursuant to Rule 87(3)(d). Should this document be admitted, the Defence submits that limited weight, if any, should be given to it unless the content of the document can be verified or supported through independent indicia. For further argument, <i>see</i> IENG Sary's Objections to the Admissibility of Certain Categories of Documents, 6 September 2011, E114, paras. 1 (Standards for the admission of documentary evidence set by the Establishment Law), 7-9 (Reliability), 11 (Relevance), 18-19 (Reports, articles and non-contemporaneous documents).
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45	Int'l Media Report	07 January 1976	International Media Report entitled "Warm Greetings to Democratic Kampuchea" (Vietnam Monthly Courier)	E190.1.319	Describes the promulgation of the DK Constitution; the content of the report of KHIEU Samphan alias Haem at the Third National Congress of People's Representatives; and Vietnamese acclamation of DK.	C. KHIEU SAMPHAN [284:1126 to 1200], Roles and Functions [286:1131 to 1152]	The Defence recognizes that the Trial Chamber has previously found that "material such as analytical reports, books, documentary films, and media articles may be relevant and will not be excluded as a category" (E185, para. 21(5)). However, the Defence submits that media articles cannot be accepted at face value as being accurate or objective, especially when the journalists may have been engaged by governments to present a particular version of the events or even to formulate disinformation. Simply, it is virtually impossible to test the validity of media articles without, at a minimum, adducing evidence from the author. It is impossible to verify the reliability of the reporting contained herein. The article contains information and conclusions not based on direct observation of events. The document is unreliable and unsuitable to prove facts it purports to prove, and it is inadmissible pursuant to Rule 87(3)(c). Further, the author of this document is not presently scheduled to testify in Case 002/01. Because Mr. IENG Sary has not been afforded his absolute right under Rule 84(1) to confront the author of this article, this document is also inadmissible pursuant to Rule 87(3)(d). Should this document be admitted, the Defence submits that limited weight, if any, should be given to it unless the content of the document can be verified or supported through independent indicia. For further argument, <i>see</i> IENG Sary's Objections to the Admissibility of Certain Categories of Documents, 6 September 2011, E114, paras. 1 (Standards for the admission of documentary evidence set by the Establishment Law), 7-9 (Reliability), 11 (Relevance), 18-19 (Reports, articles and non-contemporaneous documents).
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46	Int'l Media Report	12 February 1976	International Media Report entitled "Cambodia Avoids Starvation, Revolt" (Washington Post)	E190.1.320	Describes refugees' accounts of forced labor and daily rations below UN recommended levels for manual labor.	A. NUON CHEA [214:862 to 993], Participation in The Common Purpose [222:895 to 992], Cooperatives and Worksites [225:903 to 915], B. IENG SARY [250:994 to 1125], Participation in the Common Purpose [255:1018 to 1121], Cooperatives and worksites [258:1026 to 1047], C. KHIEU SAMPHAN [284:1126 to 1200], Participation in the Common Purpose [291:1153 to 1199], Cooperatives and Worksites [294:1164 to 1171], D. IENG THIRITH [304:1201 to 1298], Participation in the Common Purpose [309:1227 to 1295], Cooperatives and Worksites [310:1235 to 1246]	The Defence recognizes that the Trial Chamber has previously found that "material such as analytical reports, books, documentary films, and media articles may be relevant and will not be excluded as a category" (E185, para. 21(5)). However, the Defence submits that media articles cannot be accepted at face value as being accurate or objective, especially when the journalists may have been engaged by governments to present a particular version of the events or even to formulate disinformation. Simply, it is virtually impossible to test the validity of media articles without, at a minimum, adducing evidence from the author. It is impossible to verify the reliability of the reporting contained herein. The article contains information and conclusions not based on direct observation of events. The document is unreliable and unsuitable to prove facts it purports to prove, and it is inadmissible pursuant to Rule 87(3)(c). Further, the author of this document is not presently scheduled to testify in Case 002/01. Because Mr. IENG Sary has not been afforded his absolute right under Rule 84(1) to confront the author of this article, this document is also inadmissible pursuant to Rule 87(3)(d). Should this document be admitted, the Defence submits that limited weight, if any, should be given to it unless the content of the document can be verified or supported through independent indicia. For further argument, <i>see</i> IENG Sary's Objections to the Admissibility of Certain Categories of Documents, 6 September 2011, E114, paras. 1 (Standards for the admission of documentary evidence set by the Establishment Law), 7-9 (Reliability), 11 (Relevance), 18-19 (Reports, articles and non-contemporaneous documents).
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47	Int'l Media Report	16 April 1976	International Media Report entitled "The Cambodian Horror" (Wall Street Journal)	E190.1.321	Describes estimates of the number of deaths in Cambodia. Describes forced marches, forced labour, mass killings.	A. NUON CHEA [214:862 to 993], Participation in The Common Purpose [222:895 to 992], B. IENG SARY [250:994 to 1125], Participation in the Common Purpose [255:1018 to 1121], C. KHIEU SAMPHAN [284:1126 to 1200], Participation in the Common Purpose [291:1153 to 1199], D. IENG THIRITH [304:1201 to 1298], Participation in the Common Purpose [309:1227to1295]	The Defence recognizes that the Trial Chamber has previously found that "material such as analytical reports, books, documentary films, and media articles may be relevant and will not be excluded as a category" (E185, para. 21(5)). However, the Defence submits that media articles cannot be accepted at face value as being accurate or objective, especially when the journalists may have been engaged by governments to present a particular version of the events or even to formulate disinformation. Simply, it is virtually impossible to test the validity of media articles without, at a minimum, adducing evidence from the author. It is impossible to verify the reliability of the reporting contained herein. The article contains information and conclusions not based on direct observation of events. The document is unreliable and unsuitable to prove facts it purports to prove, and it is inadmissible pursuant to Rule 87(3)(c). Further, the author of this document is not presently scheduled to testify in Case 002/01. Because Mr. IENG Sary has not been afforded his absolute right under Rule 84(1) to confront the author of this article, this document is also inadmissible pursuant to Rule 87(3)(d). Should this document be admitted, the Defence submits that limited weight, if any, should be given to it unless the content of the document can be verified or supported through independent indicia. For further argument, <i>see</i> IENG Sary's Objections to the Admissibility of Certain Categories of Documents, 6 September 2011, E114, paras. 1 (Standards for the admission of documentary evidence set by the Establishment Law), 7-9 (Reliability), 11 (Relevance), 18-19 (Reports, articles and non-contemporaneous documents).
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48	Int'l Media Report	29 April 1976	International Media Report entitled "The Khmer Rouge: Rampant Terror" (Time Magazine)	E190.1.322	Indicates KHIEU Samphan alias Haem's role as a spokesperson for DK. Describes forced transfers and forced labour in DK, and estimates that up to 600,000 people have been executed or have died from starvation and disease.	B. MEANS OF COMMUNICATION [28:90 to 112], Political and Education Material [30:99 to 112], Public Radio [32:108 to 112], Movement of the Population from Phnom Penh (Phase 1) [60:221 to 261], C. KHIEU SAMPHAN [284:1126 to 1200], Roles and Functions [286:1131 to 1152], Speeches and Political Education [290:1148 to 1150]	The Defence recognizes that the Trial Chamber has previously found that "material such as analytical reports, books, documentary films, and media articles may be relevant and will not be excluded as a category" (E185, para. 21(5)). However, the Defence submits that media articles cannot be accepted at face value as being accurate or objective, especially when the journalists may have been engaged by governments to present a particular version of the events or even to formulate disinformation. Simply, it is virtually impossible to test the validity of media articles without, at a minimum, adducing evidence from the author. It is impossible to verify the reliability of the reporting contained herein. The article contains information and conclusions not based on direct observation of events. The document is unreliable and unsuitable to prove facts it purports to prove, and it is inadmissible pursuant to Rule 87(3)(c). Further, the author of this document is not presently scheduled to testify in Case 002/01. Because Mr. IENG Sary has not been afforded his absolute right under Rule 84(1) to confront the author of this article, this document is also inadmissible pursuant to Rule 87(3)(d). Should this document be admitted, the Defence submits that limited weight, if any, should be given to it unless the content of the document can be verified or supported through independent indicia. For further argument, <i>see</i> IENG Sary's Objections to the Admissibility of Certain Categories of Documents, 6 September 2011, E114, paras. 1 (Standards for the admission of documentary evidence set by the Establishment Law), 7-9 (Reliability), 11 (Relevance), 18-19 (Reports, articles and non-contemporaneous documents).
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49	Int'l Media Report	24 April 1976	International Media Report entitled "Cambodia; The End of the Beginning" (The Economist)	E190.1.323	Reports on forced evacuations of cities, executions, beatings, torture, decesses, lack of food, deaths resulting from various other factors.	VII. FACTUAL FINDINGS OF JOINT CRIMINAL ENTERPRISE [41:156 to 220], A. MOVEMENT OF THE POPULATION [42:160 to 167], B. COOPERATIVES AND WORKSITES [44:168 to 177], C. SECURITY CENTRES AND EXECUTION SITES [47:178 to 204]	The Defence recognizes that the Trial Chamber has previously found that "material such as analytical reports, books, documentary films, and media articles may be relevant and will not be excluded as a category" (E185, para. 21(5)). However, the Defence submits that media articles cannot be accepted at face value as being accurate or objective, especially when the journalists may have been engaged by governments to present a particular version of the events or even to formulate disinformation. Simply, it is virtually impossible to test the validity of media articles without, at a minimum, adducing evidence from the author. It is impossible to verify the reliability of the reporting contained herein. The article contains information and conclusions not based on direct observation of events. The document is unreliable and unsuitable to prove facts it purports to prove, and it is inadmissible pursuant to Rule 87(3)(c). Further, the author of this document is not presently scheduled to testify in Case 002/01. Because Mr. IENG Sary has not been afforded his absolute right under Rule 84(1) to confront the author of this article, this document is also inadmissible pursuant to Rule 87(3)(d). Should this document be admitted, the Defence submits that limited weight, if any, should be given to it unless the content of the document can be verified or supported through independent indicia. For further argument, <i>see</i> IENG Sary's Objections to the Admissibility of Certain Categories of Documents, 6 September 2011, E114, paras. 1 (Standards for the admission of documentary evidence set by the Establishment Law), 7-9 (Reliability), 11 (Relevance), 18-19 (Reports, articles and non-contemporaneous documents).
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50	Int'l Media Report	03 December 1976	International Media Report entitled "Flow of Cambodia Refugees Into Thailand Dries Up" (Los Angeles Times)	E190.1.324	Describes living conditions in DK from perspective of refugees. Notes that fewer refugees are arriving in Thailand because of increased DK control.	VII. FACTUAL FINDINGS OF JOINT CRIMINAL ENTERPRISE [41:156 to 220], D. TREATMENT OF TARGETED GROUPS [55:205 to 215], Treatment of Buddhists [184:740 to 744]	The Defence recognizes that the Trial Chamber has previously found that "material such as analytical reports, books, documentary films, and media articles may be relevant and will not be excluded as a category" (E185, para. 21(5)). However, the Defence submits that media articles cannot be accepted at face value as being accurate or objective, especially when the journalists may have been engaged by governments to present a particular version of the events or even to formulate disinformation. Simply, it is virtually impossible to test the validity of media articles without, at a minimum, adducing evidence from the author. It is impossible to verify the reliability of the reporting contained herein. The article contains information and conclusions not based on direct observation of events. The document is unreliable and unsuitable to prove facts it purports to prove, and it is inadmissible pursuant to Rule 87(3)(c). Further, the author of this document is not presently scheduled to testify in Case 002/01. Because Mr. IENG Sary has not been afforded his absolute right under Rule 84(1) to confront the author of this article, this document is also inadmissible pursuant to Rule 87(3)(d). Should this document be admitted, the Defence submits that limited weight, if any, should be given to it unless the content of the document can be verified or supported through independent indicia. For further argument, <i>see</i> IENG Sary's Objections to the Admissibility of Certain Categories of Documents, 6 September 2011, E114, paras. 1 (Standards for the admission of documentary evidence set by the Establishment Law), 7-9 (Reliability), 11 (Relevance), 18-19 (Reports, articles and non-contemporaneous documents).
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51	Int'l Media Report	26 February 1977	International Media Report entitled "Cambodia; Counting the Cost" (The Economist)	E190.1.325	Describes KHIEU Samphan alias Haem being presented statistics, including an estimated number of 1,2 millions deaths. Describes two book reviews.	C. KHIEU SAMPHAN [284:1126 to 1200], Participation in the Common Purpose [291:1153 to 1199], Movement of the Population [291:1152 to 1163], Cooperatives and Worksites [294:1164 to 1171]	The Defence recognizes that the Trial Chamber has previously found that "material such as analytical reports, books, documentary films, and media articles may be relevant and will not be excluded as a category" (E185, para. 21(5)). However, the Defence submits that media articles cannot be accepted at face value as being accurate or objective, especially when the journalists may have been engaged by governments to present a particular version of the events or even to formulate disinformation. Simply, it is virtually impossible to test the validity of media articles without, at a minimum, adducing evidence from the author. It is impossible to verify the reliability of the reporting contained herein. The article contains information and conclusions not based on direct observation of events. The document is unreliable and unsuitable to prove facts it purports to prove, and it is inadmissible pursuant to Rule 87(3)(c). Further, the author of this document is not presently scheduled to testify in Case 002/01. Because Mr. IENG Sary has not been afforded his absolute right under Rule 84(1) to confront the author of this article, this document is also inadmissible pursuant to Rule 87(3)(d). Should this document be admitted, the Defence submits that limited weight, if any, should be given to it unless the content of the document can be verified or supported through independent indicia. For further argument, <i>see</i> IENG Sary's Objections to the Admissibility of Certain Categories of Documents, 6 September 2011, E114, paras. 1 (Standards for the admission of documentary evidence set by the Establishment Law), 7-9 (Reliability), 11 (Relevance), 18-19 (Reports, articles and non-contemporaneous documents).
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52	Int'l Media Report	06 March 1977	International Media Report entitled "Human Rights: The Rest of the World Sees them Differently" (New York Times)	E190.1.326	Details state of human rights generally around the world, but notes that "radical forces" have isolated Cambodia/ and killed and exiled millions.	VII. FACTUAL FINDINGS OF JOINT CRIMINAL ENTERPRISE [41:156 to 220], A. MOVEMENT OF THE POPULATION [42:160 to 167], B. COOPERATIVES AND WORKSITES [44:168 to 177], D. TREATMENT OF TARGETED GROUPS [55:205 to 215]	The Defence recognizes that the Trial Chamber has previously found that "material such as analytical reports, books, documentary films, and media articles may be relevant and will not be excluded as a category" (E185, para. 21(5)). However, the Defence submits that media articles cannot be accepted at face value as being accurate or objective, especially when the journalists may have been engaged by governments to present a particular version of the events or even to formulate disinformation. Simply, it is virtually impossible to test the validity of media articles without, at a minimum, adducing evidence from the author. It is impossible to verify the reliability of the reporting contained herein. The article contains information and conclusions not based on direct observation of events. The document is unreliable and unsuitable to prove facts it purports to prove, and it is inadmissible pursuant to Rule 87(3)(c). Further, the author of this document is not presently scheduled to testify in Case 002/01. Because Mr. IENG Sary has not been afforded his absolute right under Rule 84(1) to confront the author of this article, this document is also inadmissible pursuant to Rule 87(3)(d). Should this document be admitted, the Defence submits that limited weight, if any, should be given to it unless the content of the document can be verified or supported through independent indicia. For further argument, <i>see</i> IENG Sary's Objections to the Admissibility of Certain Categories of Documents, 6 September 2011, E114, paras. 1 (Standards for the admission of documentary evidence set by the Establishment Law), 7-9 (Reliability), 11 (Relevance), 18-19 (Reports, articles and non-contemporaneous documents).
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53	Int'l Media Report	08 April 1977	International Media Report entitled "Forced Cambodian Labor Depicted" (Washington Post)	E190.1.327	Describes the evacuation of Phnom Penh. Contains pictures showing people forced to work at gun-point.	VII. FACTUAL FINDINGS OF JOINT CRIMINAL ENTERPRISE [41:156 to 220], A. MOVEMENT OF THE POPULATION [42:160 to 167], B. COOPERATIVES AND WORKSITES [44:168 to 177]	The Defence recognizes that the Trial Chamber has previously found that "material such as analytical reports, books, documentary films, and media articles may be relevant and will not be excluded as a category" (E185, para. 21(5)). However, the Defence submits that media articles cannot be accepted at face value as being accurate or objective, especially when the journalists may have been engaged by governments to present a particular version of the events or even to formulate disinformation. Simply, it is virtually impossible to test the validity of media articles without, at a minimum, adducing evidence from the author. It is impossible to verify the reliability of the reporting contained herein. The article contains information and conclusions not based on direct observation of events. The document is unreliable and unsuitable to prove facts it purports to prove, and it is inadmissible pursuant to Rule 87(3)(c). Further, the author of this document is not presently scheduled to testify in Case 002/01. Because Mr. IENG Sary has not been afforded his absolute right under Rule 84(1) to confront the author of this article, this document is also inadmissible pursuant to Rule 87(3)(d). Should this document be admitted, the Defence submits that limited weight, if any, should be given to it unless the content of the document can be verified or supported through independent indicia. For further argument, <i>see</i> IENG Sary's Objections to the Admissibility of Certain Categories of Documents, 6 September 2011, E114, paras. 1 (Standards for the admission of documentary evidence set by the Establishment Law), 7-9 (Reliability), 11 (Relevance), 18-19 (Reports, articles and non-contemporaneous documents).
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54	Int'l Media Report	08 April 1977	International Media Report entitled "Parliament Hill: Cambodia Genocide Draws Condemnation" (The Globe and Mail)	E190.1.328	Describes a Canadian parliament resolution condemning the genocide of two million people in Cambodia.	A. NUON CHEA [214:862 to 993], Participation in The Common Purpose [222:895 to 992], B. IENG SARY [250:994 to 1125], Participation in the Common Purpose [255:1018 to 1121], C. KHIEU SAMPHAN [284:1126 to 1200], Participation in the Common Purpose [291:1153 to 1199], D. IENG THIRITH [304:1201 to 1298], Participation in the Common Purpose [309:1227to1295]	The Defence recognizes that the Trial Chamber has previously found that "material such as analytical reports, books, documentary films, and media articles may be relevant and will not be excluded as a category" (E185, para. 21(5)). However, the Defence submits that media articles cannot be accepted at face value as being accurate or objective, especially when the journalists may have been engaged by governments to present a particular version of the events or even to formulate disinformation. Simply, it is virtually impossible to test the validity of media articles without, at a minimum, adducing evidence from the author. It is impossible to verify the reliability of the reporting contained herein. The article contains information and conclusions not based on direct observation of events. The document is unreliable and unsuitable to prove facts it purports to prove, and it is inadmissible pursuant to Rule 87(3)(c). Further, the author of this document is not presently scheduled to testify in Case 002/01. Because Mr. IENG Sary has not been afforded his absolute right under Rule 84(1) to confront the author of this article, this document is also inadmissible pursuant to Rule 87(3)(d). Should this document be admitted, the Defence submits that limited weight, if any, should be given to it unless the content of the document can be verified or supported through independent indicia. For further argument, <i>see</i> IENG Sary's Objections to the Admissibility of Certain Categories of Documents, 6 September 2011, E114, paras. 1 (Standards for the admission of documentary evidence set by the Establishment Law), 7-9 (Reliability), 11 (Relevance), 18-19 (Reports, articles and non-contemporaneous documents).
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55	Int'l Media Report	20 April 1977	International Media Report entitled "Carter's First Big Crunch" (New York Times)	E190.1.329	Describes economic crisis in Cambodia/which is said to have doomed itself by deliberately destroying its factories and killing its technicians.	VII. FACTUAL FINDINGS OF JOINT CRIMINAL ENTERPRISE [41:156 to 220], B. COOPERATIVES AND WORKSITES [44:168 to 177], D. TREATMENT OF TARGETED GROUPS [55:205 to 215]	The Defence recognizes that the Trial Chamber has previously found that "material such as analytical reports, books, documentary films, and media articles may be relevant and will not be excluded as a category" (E185, para. 21(5)). However, the Defence submits that media articles cannot be accepted at face value as being accurate or objective, especially when the journalists may have been engaged by governments to present a particular version of the events or even to formulate disinformation. Simply, it is virtually impossible to test the validity of media articles without, at a minimum, adducing evidence from the author. It is impossible to verify the reliability of the reporting contained herein. The article contains information and conclusions not based on direct observation of events. The document is unreliable and unsuitable to prove facts it purports to prove, and it is inadmissible pursuant to Rule 87(3)(c). Further, the author of this document is not presently scheduled to testify in Case 002/01. Because Mr. IENG Sary has not been afforded his absolute right under Rule 84(1) to confront the author of this article, this document is also inadmissible pursuant to Rule 87(3)(d). Should this document be admitted, the Defence submits that limited weight, if any, should be given to it unless the content of the document can be verified or supported through independent indicia. For further argument, <i>see</i> IENG Sary's Objections to the Admissibility of Certain Categories of Documents, 6 September 2011, E114, paras. 1 (Standards for the admission of documentary evidence set by the Establishment Law), 7-9 (Reliability), 11 (Relevance), 18-19 (Reports, articles and non-contemporaneous documents).
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56	Int'l Media Report	02 May 1977	International Media Report entitled "Extermination in Cambodia" (Chicago Tribune)	E190.1.330	Details estimated 1.2 million deaths from executions or from poor living conditions after forced evacuation from cities and other forced movements.	VII. FACTUAL FINDINGS OF JOINT CRIMINAL ENTERPRISE [41:156 to 220], A. MOVEMENT OF THE POPULATION [42:160 to 167], C. SECURITY CENTRES AND EXECUTION SITES [47:178 to 204], Movement of the Population from Phnom Penh (Phase 1) [60:221 to 261], "Movement of the Population from the Central (Old North), Southwest, West and East Zones (Phase 2) [69:262 to 282]"	The Defence recognizes that the Trial Chamber has previously found that "material such as analytical reports, books, documentary films, and media articles may be relevant and will not be excluded as a category" (E185, para. 21(5)). However, the Defence submits that media articles cannot be accepted at face value as being accurate or objective, especially when the journalists may have been engaged by governments to present a particular version of the events or even to formulate disinformation. Simply, it is virtually impossible to test the validity of media articles without, at a minimum, adducing evidence from the author. It is impossible to verify the reliability of the reporting contained herein. The article contains information and conclusions not based on direct observation of events. The document is unreliable and unsuitable to prove facts it purports to prove, and it is inadmissible pursuant to Rule 87(3)(c). Further, the author of this document is not presently scheduled to testify in Case 002/01. Because Mr. IENG Sary has not been afforded his absolute right under Rule 84(1) to confront the author of this article, this document is also inadmissible pursuant to Rule 87(3)(d). Should this document be admitted, the Defence submits that limited weight, if any, should be given to it unless the content of the document can be verified or supported through independent indicia. For further argument, <i>see</i> IENG Sary's Objections to the Admissibility of Certain Categories of Documents, 6 September 2011, E114, paras. 1 (Standards for the admission of documentary evidence set by the Establishment Law), 7-9 (Reliability), 11 (Relevance), 18-19 (Reports, articles and non-contemporaneous documents).
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57	Int'l Media Report	02 May 1977 to 29 August 2007	International Media Reports from Factiva regarding IENG Thirith (83 articles)	E190.1.331	Contains a series of international articles which refer to IENG Thirith alias Phea from 1976 till 2007. Detail her senior role in DK regime, and her continued insistence that the regime was important for Cambodia/'s progress.	D. IENG THIRITH [304:1201 to 1298], Background [304:1201 to 1206], Roles and Functions [305:1207 to 1226], PART FOUR: CHARACTER INFORMATION [390:1577to1612], IV. IENG THIRITH [394:1605to1612]	The Defence recognizes that the Trial Chamber has previously found that "material such as analytical reports, books, documentary films, and media articles may be relevant and will not be excluded as a category" (E185, para. 21(5)). However, the Defence submits that media articles cannot be accepted at face value as being accurate or objective, especially when the journalists may have been engaged by governments to present a particular version of the events or even to formulate disinformation. Simply, it is virtually impossible to test the validity of media articles without, at a minimum, adducing evidence from the author. It is impossible to verify the reliability of the reporting contained herein. The article contains information and conclusions not based on direct observation of events. The document is unreliable and unsuitable to prove facts it purports to prove, and it is inadmissible pursuant to Rule 87(3)(c). Further, the author of this document is not presently scheduled to testify in Case 002/01. Because Mr. IENG Sary has not been afforded his absolute right under Rule 84(1) to confront the author of this article, this document is also inadmissible pursuant to Rule 87(3)(d). Should this document be admitted, the Defence submits that limited weight, if any, should be given to it unless the content of the document can be verified or supported through independent indicia. For further argument, <i>see</i> IENG Sary's Objections to the Admissibility of Certain Categories of Documents, 6 September 2011, E114, paras. 1 (Standards for the admission of documentary evidence set by the Establishment Law), 7-9 (Reliability), 11 (Relevance), 18-19 (Reports, articles and non-contemporaneous documents).
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58	Int'l Media Report	09 May 1977	International Media Report entitled "Cambodia Criticized on Human Rights" (Washington Post)	E190.1.332	Describes DK silence over the fate of people repatriated from Thailand and former Khmer Republic officials and their families.	D. TREATMENT OF TARGETED GROUPS [55:205 to 215], A. NUON CHEA [214:862 to 993], Participation in The Common Purpose [222:895 to 992], Targeting of Groups [246:975 to 990], B. IENG SARY [250:994 to 1125], Participation in the Common Purpose [255:1018 to 1121], Targeting of Groups [280:1105 to 1119], C. KHIEU SAMPHAN [284:1126 to 1200], Participation in the Common Purpose [291:1153 to 1199], Targeting of Groups [301:1191 to 1198], D. IENG THIRITH [304:1201 to 1298], Participation in the Common Purpose [309:1227to1295], Treatment of Targeted Groups [321:1288 to 1292]	The Defence recognizes that the Trial Chamber has previously found that "material such as analytical reports, books, documentary films, and media articles may be relevant and will not be excluded as a category" (E185, para. 21(5)). However, the Defence submits that media articles cannot be accepted at face value as being accurate or objective, especially when the journalists may have been engaged by governments to present a particular version of the events or even to formulate disinformation. Simply, it is virtually impossible to test the validity of media articles without, at a minimum, adducing evidence from the author. It is impossible to verify the reliability of the reporting contained herein. The article contains information and conclusions not based on direct observation of events. The document is unreliable and unsuitable to prove facts it purports to prove, and it is inadmissible pursuant to Rule 87(3)(c). Further, the author of this document is not presently scheduled to testify in Case 002/01. Because Mr. IENG Sary has not been afforded his absolute right under Rule 84(1) to confront the author of this article, this document is also inadmissible pursuant to Rule 87(3)(d). Should this document be admitted, the Defence submits that limited weight, if any, should be given to it unless the content of the document can be verified or supported through independent indicia. For further argument, <i>see</i> IENG Sary's Objections to the Admissibility of Certain Categories of Documents, 6 September 2011, E114, paras. 1 (Standards for the admission of documentary evidence set by the Establishment Law), 7-9 (Reliability), 11 (Relevance), 18-19 (Reports, articles and non-contemporaneous documents).
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59	Int'l Media Report	30 May 1977	International Media Report entitled "Cambodia: Horror Stories" (Newsweek)	E190.1.333	Based on consistent refugee stories and claims, reports on mass executions that occurred after the forced evacuation of population from the cities and alleges forced labour.	VII. FACTUAL FINDINGS OF JOINT CRIMINAL ENTERPRISE [41:156 to 220], A. MOVEMENT OF THE POPULATION [42:160 to 167], B. COOPERATIVES AND WORKSITES [44:168 to 177], D. TREATMENT OF TARGETED GROUPS [55:205 to 215]	The Defence recognizes that the Trial Chamber has previously found that "material such as analytical reports, books, documentary films, and media articles may be relevant and will not be excluded as a category" (E185, para. 21(5)). However, the Defence submits that media articles cannot be accepted at face value as being accurate or objective, especially when the journalists may have been engaged by governments to present a particular version of the events or even to formulate disinformation. Simply, it is virtually impossible to test the validity of media articles without, at a minimum, adducing evidence from the author. It is impossible to verify the reliability of the reporting contained herein. The article contains information and conclusions not based on direct observation of events. The document is unreliable and unsuitable to prove facts it purports to prove, and it is inadmissible pursuant to Rule 87(3)(c). Further, the author of this document is not presently scheduled to testify in Case 002/01. Because Mr. IENG Sary has not been afforded his absolute right under Rule 84(1) to confront the author of this article, this document is also inadmissible pursuant to Rule 87(3)(d). Should this document be admitted, the Defence submits that limited weight, if any, should be given to it unless the content of the document can be verified or supported through independent indicia. For further argument, <i>see</i> IENG Sary's Objections to the Admissibility of Certain Categories of Documents, 6 September 2011, E114, paras. 1 (Standards for the admission of documentary evidence set by the Establishment Law), 7-9 (Reliability), 11 (Relevance), 18-19 (Reports, articles and non-contemporaneous documents).
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60	Int'l Media Report	07 July 1977	International Media Report entitled "The Human Rights Clamor Ignores Cambodia's Holocaust" (Chicago Tribune)	E190.1.334	Details international reluctance to act against DK regime. Describes forced evacuation of Phnom Penh during which the sick and wounded were killed and Khmer Rouge cadres even shot and beat hospital patients to death; also describes mass executions.	VII. FACTUAL FINDINGS OF JOINT CRIMINAL ENTERPRISE [41:156 to 220], A. MOVEMENT OF THE POPULATION [42:160 to 167], C. SECURITY CENTRES AND EXECUTION SITES [47:178 to 204], D. TREATMENT OF TARGETED GROUPS [55:205 to 215], Movement of the Population from Phnom Penh (Phase 1) [60:221 to 261]	The Defence recognizes that the Trial Chamber has previously found that "material such as analytical reports, books, documentary films, and media articles may be relevant and will not be excluded as a category" (E185, para. 21(5)). However, the Defence submits that media articles cannot be accepted at face value as being accurate or objective, especially when the journalists may have been engaged by governments to present a particular version of the events or even to formulate disinformation. Simply, it is virtually impossible to test the validity of media articles without, at a minimum, adducing evidence from the author. It is impossible to verify the reliability of the reporting contained herein. The article contains information and conclusions not based on direct observation of events. The document is unreliable and unsuitable to prove facts it purports to prove, and it is inadmissible pursuant to Rule 87(3)(c). Further, the author of this document is not presently scheduled to testify in Case 002/01. Because Mr. IENG Sary has not been afforded his absolute right under Rule 84(1) to confront the author of this article, this document is also inadmissible pursuant to Rule 87(3)(d). Should this document be admitted, the Defence submits that limited weight, if any, should be given to it unless the content of the document can be verified or supported through independent indicia. For further argument, <i>see</i> IENG Sary's Objections to the Admissibility of Certain Categories of Documents, 6 September 2011, E114, paras. 1 (Standards for the admission of documentary evidence set by the Establishment Law), 7-9 (Reliability), 11 (Relevance), 18-19 (Reports, articles and non-contemporaneous documents).
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61	Int'l Media Report	21 July 1977	International Media Report entitled "Cambodia: Most Brutal Dictatorship" (Washington Post)	E190.1.335	Estimates 1 million people have already died from mistreatment and executions in DK. Describes the country being sealed off due to DK Government policy and action; denounces the forced evacuation of Phnom Penh, killing of educated people and existence of mass graves across the country.	VII. FACTUAL FINDINGS OF JOINT CRIMINAL ENTERPRISE [41:156 to 220], A. MOVEMENT OF THE POPULATION [42:160 to 167], C. SECURITY CENTRES AND EXECUTION SITES [47:178 to 204], D. TREATMENT OF TARGETED GROUPS [55:205 to 215], Movement of the Population from Phnom Penh (Phase 1) [60:221 to 261]	The Defence recognizes that the Trial Chamber has previously found that "material such as analytical reports, books, documentary films, and media articles may be relevant and will not be excluded as a category" (E185, para. 21(5)). However, the Defence submits that media articles cannot be accepted at face value as being accurate or objective, especially when the journalists may have been engaged by governments to present a particular version of the events or even to formulate disinformation. Simply, it is virtually impossible to test the validity of media articles without, at a minimum, adducing evidence from the author. It is impossible to verify the reliability of the reporting contained herein. The article contains information and conclusions not based on direct observation of events. The document is unreliable and unsuitable to prove facts it purports to prove, and it is inadmissible pursuant to Rule 87(3)(c). Further, the author of this document is not presently scheduled to testify in Case 002/01. Because Mr. IENG Sary has not been afforded his absolute right under Rule 84(1) to confront the author of this article, this document is also inadmissible pursuant to Rule 87(3)(d). Should this document be admitted, the Defence submits that limited weight, if any, should be given to it unless the content of the document can be verified or supported through independent indicia. For further argument, <i>see</i> IENG Sary's Objections to the Admissibility of Certain Categories of Documents, 6 September 2011, E114, paras. 1 (Standards for the admission of documentary evidence set by the Establishment Law), 7-9 (Reliability), 11 (Relevance), 18-19 (Reports, articles and non-contemporaneous documents).
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62	Int'l Media Report	22 July 1977	International Media Report entitled "Disease, Hunger Ravage Cambodia as Birthrate Falls" (Washington Post)	E190.1.336	Reports a refugee describing forced labour in Cambodia.	VI. ARMED CONFLICT [40:150 to 155], VII. FACTUAL FINDINGS OF JOINT CRIMINAL ENTERPRISE [41:156 to 220], B. COOPERATIVES AND WORKSITES [44:168 to 177]	The Defence recognizes that the Trial Chamber has previously found that "material such as analytical reports, books, documentary films, and media articles may be relevant and will not be excluded as a category" (E185, para. 21(5)). However, the Defence submits that media articles cannot be accepted at face value as being accurate or objective, especially when the journalists may have been engaged by governments to present a particular version of the events or even to formulate disinformation. Simply, it is virtually impossible to test the validity of media articles without, at a minimum, adducing evidence from the author. It is impossible to verify the reliability of the reporting contained herein. The article contains information and conclusions not based on direct observation of events. The document is unreliable and unsuitable to prove facts it purports to prove, and it is inadmissible pursuant to Rule 87(3)(c). Further, the author of this document is not presently scheduled to testify in Case 002/01. Because Mr. IENG Sary has not been afforded his absolute right under Rule 84(1) to confront the author of this article, this document is also inadmissible pursuant to Rule 87(3)(d). Should this document be admitted, the Defence submits that limited weight, if any, should be given to it unless the content of the document can be verified or supported through independent indicia. For further argument, <i>see</i> IENG Sary's Objections to the Admissibility of Certain Categories of Documents, 6 September 2011, E114, paras. 1 (Standards for the admission of documentary evidence set by the Establishment Law), 7-9 (Reliability), 11 (Relevance), 18-19 (Reports, articles and non-contemporaneous documents).
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63	Int'l Media Report	19 September 1977	International Media Report entitled "Out of the Silence: 'Peace with Horror'" (The Economist)	E190.1.337	Book Review of "Out of the Silence: 'Peace with Horror' by John BARROW and Anthony PAUL". Describes the evacuation of cities; lack of food and medicine; executions for minor infractions; executions of former Khmer Republic officials.	A. MOVEMENT OF THE POPULATION [42:160 to 167], D. TREATMENT OF TARGETED GROUPS [55:205 to 215]	The Defence recognizes that the Trial Chamber has previously found that "material such as analytical reports, books, documentary films, and media articles may be relevant and will not be excluded as a category" (E185, para. 21(5)). However, the Defence submits that media articles cannot be accepted at face value as being accurate or objective, especially when the journalists may have been engaged by governments to present a particular version of the events or even to formulate disinformation. Simply, it is virtually impossible to test the validity of media articles without, at a minimum, adducing evidence from the author. It is impossible to verify the reliability of the reporting contained herein. The article contains information and conclusions not based on direct observation of events. The document is unreliable and unsuitable to prove facts it purports to prove, and it is inadmissible pursuant to Rule 87(3)(c). Further, the author of this document is not presently scheduled to testify in Case 002/01. Because Mr. IENG Sary has not been afforded his absolute right under Rule 84(1) to confront the author of this article, this document is also inadmissible pursuant to Rule 87(3)(d). Should this document be admitted, the Defence submits that limited weight, if any, should be given to it unless the content of the document can be verified or supported through independent indicia. For further argument, <i>see</i> IENG Sary's Objections to the Admissibility of Certain Categories of Documents, 6 September 2011, E114, paras. 1 (Standards for the admission of documentary evidence set by the Establishment Law), 7-9 (Reliability), 11 (Relevance), 18-19 (Reports, articles and non-contemporaneous documents).
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64	Int'l Media Report	26 September 1977	International Media Report entitled "Cambodia - Our Sinful Sloth" (Los Angeles Times)	E190.1.338	Details a press interview given by KHIEU Samphan alias Haem where he expresses frustration at Western preoccupation with war criminals. Also describes international reluctance to intervene in DK.	B. IENG SARY [250:994 to 1125], Roles and Functions [251:1001 to 1017], C. KHIEU SAMPHAN [284:1126 to 1200], Roles and Functions [286:1131 to 1152], President of the State Presidium [287:1135 to 1138]	The Defence recognizes that the Trial Chamber has previously found that "material such as analytical reports, books, documentary films, and media articles may be relevant and will not be excluded as a category" (E185, para. 21(5)). However, the Defence submits that media articles cannot be accepted at face value as being accurate or objective, especially when the journalists may have been engaged by governments to present a particular version of the events or even to formulate disinformation. Simply, it is virtually impossible to test the validity of media articles without, at a minimum, adducing evidence from the author. It is impossible to verify the reliability of the reporting contained herein. The article contains information and conclusions not based on direct observation of events. The document is unreliable and unsuitable to prove facts it purports to prove, and it is inadmissible pursuant to Rule 87(3)(c). Further, the author of this document is not presently scheduled to testify in Case 002/01. Because Mr. IENG Sary has not been afforded his absolute right under Rule 84(1) to confront the author of this article, this document is also inadmissible pursuant to Rule 87(3)(d). Should this document be admitted, the Defence submits that limited weight, if any, should be given to it unless the content of the document can be verified or supported through independent indicia. For further argument, <i>see</i> IENG Sary's Objections to the Admissibility of Certain Categories of Documents, 6 September 2011, E114, paras. 1 (Standards for the admission of documentary evidence set by the Establishment Law), 7-9 (Reliability), 11 (Relevance), 18-19 (Reports, articles and non-contemporaneous documents).
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65	Int'l Media Report	05 October 1977	International Media Report entitled "Cambodian Offers Evacuation Motive" (New York Times)	E190.1.339	Describes SALOTH Sar alias POL Pot's admission that the forced evacuation of Phnom Penh was planned in advance. Also identifies each of the Accused as a senior figure in DK regime.	VII. FACTUAL FINDINGS OF JOINT CRIMINAL ENTERPRISE [41:156 to 220], A. MOVEMENT OF THE POPULATION [42:160 to 167], Movement of the Population from Phnom Penh (Phase 1) [60:221 to 261], A. NUON CHEA [214:862 to 993], Roles and Functions [215:869 to 894], Membership of the Central and Standing Committees [215:869 to 872] - Roles and Functions [215:869 to 894], Chairman of the People's Representative Assembly and Chairman of the Standing Committee of the People's Representative Assembly [221:889 to 890], B. IENG SARY [250:994 to 1125], Roles and Functions [251:1001 to 1017], Membership of the Central and Standing Committees [251:1001 to 1004], Deputy Prime Minister for Foreign Affairs [252:1005 to 1014], C. KHIEU SAMPHAN [284:1126 to 1200], Roles and Functions [286:1131 to 1152], President of the State Presidium [287:1135 to 1138], D. IENG THIRITH [304:1201 to 1298], Roles and Functions [305:1207 to 1226], Minister of Social Affairs [305:1209 to 1221]	The Defence recognizes that the Trial Chamber has previously found that "material such as analytical reports, books, documentary films, and media articles may be relevant and will not be excluded as a category" (E185, para. 21(5)). However, the Defence submits that media articles cannot be accepted at face value as being accurate or objective, especially when the journalists may have been engaged by governments to present a particular version of the events or even to formulate disinformation. Simply, it is virtually impossible to test the validity of media articles without, at a minimum, adducing evidence from the author. It is impossible to verify the reliability of the reporting contained herein. The article contains information and conclusions not based on direct observation of events. The document is unreliable and unsuitable to prove facts it purports to prove, and it is inadmissible pursuant to Rule 87(3)(c). Further, the author of this document is not presently scheduled to testify in Case 002/01. Because Mr. IENG Sary has not been afforded his absolute right under Rule 84(1) to confront the author of this article, this document is also inadmissible pursuant to Rule 87(3)(d). Should this document be admitted, the Defence submits that limited weight, if any, should be given to it unless the content of the document can be verified or supported through independent indicia. For further argument, <i>see</i> IENG Sary's Objections to the Admissibility of Certain Categories of Documents, 6 September 2011, E114, paras. 1 (Standards for the admission of documentary evidence set by the Establishment Law), 7-9 (Reliability), 11 (Relevance), 18-19 (Reports, articles and non-contemporaneous documents).
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66	Int'l Media Report	07 October 1977	International Media Report entitled "Secretary Pol Pot's Speech" (Peking Review)	E190.1.341	Pol Pot speech at banquet in Peking, stating that the Cambodian revolution was based on the teachings of Mao Tse Tung regarding the role of the countryside and cities, class analysis and "revolutionary violence." He also describes rice production quota, the export of rice, the construction of water reservoirs, and the distinction between friends and enemies.	VII. FACTUAL FINDINGS OF JOINT CRIMINAL ENTERPRISE [41:156 to 220], A. MOVEMENT OF THE POPULATION [42:160 to 167], B. COOPERATIVES AND WORKSITES [44:168 to 177], C. SECURITY CENTRES AND EXECUTION SITES [47:178 to 204], D. TREATMENT OF TARGETED GROUPS [55:205 to 215]	The Defence recognizes that the Trial Chamber has previously found that "material such as analytical reports, books, documentary films, and media articles may be relevant and will not be excluded as a category" (E185, para. 21(5)). However, the Defence submits that media articles cannot be accepted at face value as being accurate or objective, especially when the journalists may have been engaged by governments to present a particular version of the events or even to formulate disinformation. Simply, it is virtually impossible to test the validity of media articles without, at a minimum, adducing evidence from the author. It is impossible to verify the reliability of the reporting contained herein. The article contains information and conclusions not based on direct observation of events. The document is unreliable and unsuitable to prove facts it purports to prove, and it is inadmissible pursuant to Rule 87(3)(c). Further, the author of this document is not presently scheduled to testify in Case 002/01. Because Mr. IENG Sary has not been afforded his absolute right under Rule 84(1) to confront the author of this article, this document is also inadmissible pursuant to Rule 87(3)(d). Should this document be admitted, the Defence submits that limited weight, if any, should be given to it unless the content of the document can be verified or supported through independent indicia. For further argument, <i>see</i> IENG Sary's Objections to the Admissibility of Certain Categories of Documents, 6 September 2011, E114, paras. 1 (Standards for the admission of documentary evidence set by the Establishment Law), 7-9 (Reliability), 11 (Relevance), 18-19 (Reports, articles and non-contemporaneous documents).
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67	Int'l Media Report	07 October 1977	International Media Reports entitled "Cambodian Delegation's Visit to North Korea: Rally Speeches" and "Pol Pot's Banquet for Kim: Delegation's Departure for Peking" (KCNA)	E190.1.340	Excerpts of two speeches made by POL Pot as Head of a Cambodian Delegation visiting North Korea (North Korea), in which he states that DK was able to export several thousand tons of rice and that they had constructed numerous irrigation facilities by "carrying out a mass movement to solve water problems."	VII. FACTUAL FINDINGS OF JOINT CRIMINAL ENTERPRISE [41:156 to 220], B. COOPERATIVES AND WORKSITES [44:168 to 177]	<p>The Defence recognizes that the Trial Chamber has previously found that "material such as analytical reports, books, documentary films, and media articles may be relevant and will not be excluded as a category" (E185, para. 21(5)). However, the Defence submits that media articles cannot be accepted at face value as being accurate or objective, especially when the journalists may have been engaged by governments to present a particular version of the events or even to formulate disinformation. Simply, it is virtually impossible to test the validity of media articles without, at a minimum, adducing evidence from the author. It is impossible to verify the reliability of the reporting contained herein. The article contains information and conclusions not based on direct observation of events. The document is unreliable and unsuitable to prove facts it purports to prove, and it is inadmissible pursuant to Rule 87(3)(c). Further, the author of this document is not presently scheduled to testify in Case 002/01. Because Mr. IENG Sary has not been afforded his absolute right under Rule 84(1) to confront the author of this article, this document is also inadmissible pursuant to Rule 87(3)(d). Should this document be admitted, the Defence submits that limited weight, if any, should be given to it unless the content of the document can be verified or supported through independent indicia. For further argument, <i>see</i> IENG Sary's Objections to the Admissibility of Certain Categories of Documents, 6 September 2011, E114, paras. 1 (Standards for the admission of documentary evidence set by the Establishment Law), 7-9 (Reliability), 11 (Relevance), 18-19 (Reports, articles and non-contemporaneous documents).</p> <p>This document contains excerpts of speeches by Pol Pot. Mr. IENG Sary has not been afforded the opportunity to confront the speaker. There is apparently no recording of the speech to verify the contents of the transcript. The document is unreliable and unsuitable to prove facts it purports to prove. The Trial Chamber should reject this document pursuant to Rule 87(3)(c). For further argument, <i>see</i> IENG Sary's Objections to the Admissibility of Certain Categories of Documents, 6 September 2011, E114, para. 1 (Standards for the admission of documentary evidence set by the Establishment Law), 7-9 (Reliability), 11 (Relevance), 18-19 (Reports, articles and non-contemporaneous documents).</p>
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68	Int'l Media Report	08 October 1977	International Media Report entitled "Cambodia; What Pot?" (The Economist)	E190.1.342	Describes killings of citizens and purges of "subversive elements" and SALOTH Sar alias POL Pot as PCK leader, China and PRK as allies.	V. MILITARY STRUCTURE [33:113 to 149], G. PARTICIPATION OF RAK IN PURGES [39:146 to 149], VII. FACTUAL FINDINGS OF JOINT CRIMINAL ENTERPRISE [41:156 to 220], C. SECURITY CENTRES AND EXECUTION SITES [47:178 to 204], "Purges" [52:192 to 204], D. TREATMENT OF TARGETED GROUPS [55:205 to 215]	The Defence recognizes that the Trial Chamber has previously found that "material such as analytical reports, books, documentary films, and media articles may be relevant and will not be excluded as a category" (E185, para. 21(5)). However, the Defence submits that media articles cannot be accepted at face value as being accurate or objective, especially when the journalists may have been engaged by governments to present a particular version of the events or even to formulate disinformation. Simply, it is virtually impossible to test the validity of media articles without, at a minimum, adducing evidence from the author. It is impossible to verify the reliability of the reporting contained herein. The article contains information and conclusions not based on direct observation of events. The document is unreliable and unsuitable to prove facts it purports to prove, and it is inadmissible pursuant to Rule 87(3)(c). Further, the author of this document is not presently scheduled to testify in Case 002/01. Because Mr. IENG Sary has not been afforded his absolute right under Rule 84(1) to confront the author of this article, this document is also inadmissible pursuant to Rule 87(3)(d). Should this document be admitted, the Defence submits that limited weight, if any, should be given to it unless the content of the document can be verified or supported through independent indicia. For further argument, <i>see</i> IENG Sary's Objections to the Admissibility of Certain Categories of Documents, 6 September 2011, E114, paras. 1 (Standards for the admission of documentary evidence set by the Establishment Law), 7-9 (Reliability), 11 (Relevance), 18-19 (Reports, articles and non-contemporaneous documents).
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69	Int'l Media Report	19 October 1977	International Media Report entitled "Cambodia's Communist Regime Begins to Purge Its Own Ranks While Continuing a Crack-Down" (Wall Street Journal)	E190.1.343	Describes purges, the killing of former Khmer Republic officials, the evacuation of Phnom Penh, mass executions, widespread hunger and disease.	A. MOVEMENT OF THE POPULATION [42:160 to 167], D. TREATMENT OF TARGETED GROUPS [55:205 to 215]	The Defence recognizes that the Trial Chamber has previously found that "material such as analytical reports, books, documentary films, and media articles may be relevant and will not be excluded as a category" (E185, para. 21(5)). However, the Defence submits that media articles cannot be accepted at face value as being accurate or objective, especially when the journalists may have been engaged by governments to present a particular version of the events or even to formulate disinformation. Simply, it is virtually impossible to test the validity of media articles without, at a minimum, adducing evidence from the author. It is impossible to verify the reliability of the reporting contained herein. The article contains information and conclusions not based on direct observation of events. The document is unreliable and unsuitable to prove facts it purports to prove, and it is inadmissible pursuant to Rule 87(3)(c). Further, the author of this document is not presently scheduled to testify in Case 002/01. Because Mr. IENG Sary has not been afforded his absolute right under Rule 84(1) to confront the author of this article, this document is also inadmissible pursuant to Rule 87(3)(d). Should this document be admitted, the Defence submits that limited weight, if any, should be given to it unless the content of the document can be verified or supported through independent indicia. For further argument, <i>see</i> IENG Sary's Objections to the Admissibility of Certain Categories of Documents, 6 September 2011, E114, paras. 1 (Standards for the admission of documentary evidence set by the Establishment Law), 7-9 (Reliability), 11 (Relevance), 18-19 (Reports, articles and non-contemporaneous documents).
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70	Int'l Media Report	31 October 1977	International Media Report entitled "Refugees Depict Cambodia as Grim, Work-Gang Land" (New York Times)	E190.1.344	Describes living and working conditions in Srae Ambel village, as detailed by refugees. Details executions, disease, beatings, insufficient food and forced labour.	Srae Ambel Worksite [95:369 to 382], C. KHIEU SAMPHAN [284:1126 to 1200], Roles and Functions [286:1131 to 1152], President of the State Presidium [287:1135 to 1138]	The Defence recognizes that the Trial Chamber has previously found that "material such as analytical reports, books, documentary films, and media articles may be relevant and will not be excluded as a category" (E185, para. 21(5)). However, the Defence submits that media articles cannot be accepted at face value as being accurate or objective, especially when the journalists may have been engaged by governments to present a particular version of the events or even to formulate disinformation. Simply, it is virtually impossible to test the validity of media articles without, at a minimum, adducing evidence from the author. It is impossible to verify the reliability of the reporting contained herein. The article contains information and conclusions not based on direct observation of events. The document is unreliable and unsuitable to prove facts it purports to prove, and it is inadmissible pursuant to Rule 87(3)(c). Further, the author of this document is not presently scheduled to testify in Case 002/01. Because Mr. IENG Sary has not been afforded his absolute right under Rule 84(1) to confront the author of this article, this document is also inadmissible pursuant to Rule 87(3)(d). Should this document be admitted, the Defence submits that limited weight, if any, should be given to it unless the content of the document can be verified or supported through independent indicia. For further argument, <i>see</i> IENG Sary's Objections to the Admissibility of Certain Categories of Documents, 6 September 2011, E114, paras. 1 (Standards for the admission of documentary evidence set by the Establishment Law), 7-9 (Reliability), 11 (Relevance), 18-19 (Reports, articles and non-contemporaneous documents).
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71	Int'l Media Report	09 November 1977	International Media Report entitled "Lord of the Flies" (Wall Street Journal)	E190.1.345	Describes estimates of the number of deaths in Cambodia; also describes living conditions, including killings, absence of medical care and schools, decomposition of the familial unit.	A. NUON CHEA [214:862 to 993], Participation in The Common Purpose [222:895 to 992], B. IENG SARY [250:994 to 1125], Participation in the Common Purpose [255:1018 to 1121], C. KHIEU SAMPHAN [284:1126 to 1200], Participation in the Common Purpose [291:1153 to 1199], D. IENG THIRITH [304:1201 to 1298], Participation in the Common Purpose [309:1227to1295]	The Defence recognizes that the Trial Chamber has previously found that "material such as analytical reports, books, documentary films, and media articles may be relevant and will not be excluded as a category" (E185, para. 21(5)). However, the Defence submits that media articles cannot be accepted at face value as being accurate or objective, especially when the journalists may have been engaged by governments to present a particular version of the events or even to formulate disinformation. Simply, it is virtually impossible to test the validity of media articles without, at a minimum, adducing evidence from the author. It is impossible to verify the reliability of the reporting contained herein. The article contains information and conclusions not based on direct observation of events. The document is unreliable and unsuitable to prove facts it purports to prove, and it is inadmissible pursuant to Rule 87(3)(c). Further, the author of this document is not presently scheduled to testify in Case 002/01. Because Mr. IENG Sary has not been afforded his absolute right under Rule 84(1) to confront the author of this article, this document is also inadmissible pursuant to Rule 87(3)(d). Should this document be admitted, the Defence submits that limited weight, if any, should be given to it unless the content of the document can be verified or supported through independent indicia. For further argument, <i>see</i> IENG Sary's Objections to the Admissibility of Certain Categories of Documents, 6 September 2011, E114, paras. 1 (Standards for the admission of documentary evidence set by the Establishment Law), 7-9 (Reliability), 11 (Relevance), 18-19 (Reports, articles and non-contemporaneous documents).
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72	Int'l Media Report	10 November 1977	International Media Report entitled "World News Briefs: Britain Refuses to Appoint a Cambodian Ambassador" (New York Times)	E190.1.346	Describes Great Britain's refusal to appoint an ambassador to DK due to grave human rights violations.	B. IENG SARY [250:994 to 1125], Roles and Functions [251:1001 to 1017], Deputy Prime Minister for Foreign Affairs [252:1005 to 1014]	The Defence recognizes that the Trial Chamber has previously found that "material such as analytical reports, books, documentary films, and media articles may be relevant and will not be excluded as a category" (E185, para. 21(5)). However, the Defence submits that media articles cannot be accepted at face value as being accurate or objective, especially when the journalists may have been engaged by governments to present a particular version of the events or even to formulate disinformation. Simply, it is virtually impossible to test the validity of media articles without, at a minimum, adducing evidence from the author. It is impossible to verify the reliability of the reporting contained herein. The article contains information and conclusions not based on direct observation of events. The document is unreliable and unsuitable to prove facts it purports to prove, and it is inadmissible pursuant to Rule 87(3)(c). Further, the author of this document is not presently scheduled to testify in Case 002/01. Because Mr. IENG Sary has not been afforded his absolute right under Rule 84(1) to confront the author of this article, this document is also inadmissible pursuant to Rule 87(3)(d). Should this document be admitted, the Defence submits that limited weight, if any, should be given to it unless the content of the document can be verified or supported through independent indicia. For further argument, <i>see</i> IENG Sary's Objections to the Admissibility of Certain Categories of Documents, 6 September 2011, E114, paras. 1 (Standards for the admission of documentary evidence set by the Establishment Law), 7-9 (Reliability), 11 (Relevance), 18-19 (Reports, articles and non-contemporaneous documents).
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73	Int'l Media Report	16 November 1977	International Media Report entitled "Killings Mark Cambodia Power Struggle" (Los Angeles Times)	E190.1.347	Describes purge of DK cadres, military figures, and officials linked to the Khmer Republic. Also details executions of civilians.	VII. FACTUAL FINDINGS OF JOINT CRIMINAL ENTERPRISE [41:156 to 220], Purge of the Old and New North Zones [52:193 to 198], D. TREATMENT OF TARGETED GROUPS [55:205 to 215]	The Defence recognizes that the Trial Chamber has previously found that "material such as analytical reports, books, documentary films, and media articles may be relevant and will not be excluded as a category" (E185, para. 21(5)). However, the Defence submits that media articles cannot be accepted at face value as being accurate or objective, especially when the journalists may have been engaged by governments to present a particular version of the events or even to formulate disinformation. Simply, it is virtually impossible to test the validity of media articles without, at a minimum, adducing evidence from the author. It is impossible to verify the reliability of the reporting contained herein. The article contains information and conclusions not based on direct observation of events. The document is unreliable and unsuitable to prove facts it purports to prove, and it is inadmissible pursuant to Rule 87(3)(c). Further, the author of this document is not presently scheduled to testify in Case 002/01. Because Mr. IENG Sary has not been afforded his absolute right under Rule 84(1) to confront the author of this article, this document is also inadmissible pursuant to Rule 87(3)(d). Should this document be admitted, the Defence submits that limited weight, if any, should be given to it unless the content of the document can be verified or supported through independent indicia. For further argument, <i>see</i> IENG Sary's Objections to the Admissibility of Certain Categories of Documents, 6 September 2011, E114, paras. 1 (Standards for the admission of documentary evidence set by the Establishment Law), 7-9 (Reliability), 11 (Relevance), 18-19 (Reports, articles and non-contemporaneous documents).
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74	Int'l Media Report	21 November 1977	International Media Report entitled "Tales of Brave New Kampuchea" (Time Magazine)	E190.1.348	Describes purges, forced labour, exports of rice while food is missing in the country, forced marriage.	VII. FACTUAL FINDINGS OF JOINT CRIMINAL ENTERPRISE [41:156 to 220], B. COOPERATIVES AND WORKSITES [44:168 to 177], E. THE REGULATION OF MARRIAGE [58:216 to 220]	The Defence recognizes that the Trial Chamber has previously found that "material such as analytical reports, books, documentary films, and media articles may be relevant and will not be excluded as a category" (E185, para. 21(5)). However, the Defence submits that media articles cannot be accepted at face value as being accurate or objective, especially when the journalists may have been engaged by governments to present a particular version of the events or even to formulate disinformation. Simply, it is virtually impossible to test the validity of media articles without, at a minimum, adducing evidence from the author. It is impossible to verify the reliability of the reporting contained herein. The article contains information and conclusions not based on direct observation of events. The document is unreliable and unsuitable to prove facts it purports to prove, and it is inadmissible pursuant to Rule 87(3)(c). Further, the author of this document is not presently scheduled to testify in Case 002/01. Because Mr. IENG Sary has not been afforded his absolute right under Rule 84(1) to confront the author of this article, this document is also inadmissible pursuant to Rule 87(3)(d). Should this document be admitted, the Defence submits that limited weight, if any, should be given to it unless the content of the document can be verified or supported through independent indicia. For further argument, <i>see</i> IENG Sary's Objections to the Admissibility of Certain Categories of Documents, 6 September 2011, E114, paras. 1 (Standards for the admission of documentary evidence set by the Establishment Law), 7-9 (Reliability), 11 (Relevance), 18-19 (Reports, articles and non-contemporaneous documents).
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75	Int'l Media Report	29 November 1977	International Media Report entitled "How Can We Help Cambodia" (Chicago Tribune)	E190.1.349	Describes IENG Sary alias Van's visit to the UN General Assembly to deny DK human rights violations. Also details US condemnation of the regime.	VI. ARMED CONFLICT [40:150 to 155], VII. FACTUAL FINDINGS OF JOINT CRIMINAL ENTERPRISE [41:156 to 220], D. TREATMENT OF TARGETED GROUPS [55:205 to 215], Movement of the Population from Phnom Penh (Phase 1) [60:221 to 261], Treatment of Buddhists [184:740 to 744], B. IENG SARY [250:994 to 1125], Roles and Functions [251:1001 to 1017], Deputy Prime Minister for Foreign Affairs [252:1005 to 1014]	The Defence recognizes that the Trial Chamber has previously found that "material such as analytical reports, books, documentary films, and media articles may be relevant and will not be excluded as a category" (E185, para. 21(5)). However, the Defence submits that media articles cannot be accepted at face value as being accurate or objective, especially when the journalists may have been engaged by governments to present a particular version of the events or even to formulate disinformation. Simply, it is virtually impossible to test the validity of media articles without, at a minimum, adducing evidence from the author. It is impossible to verify the reliability of the reporting contained herein. The article contains information and conclusions not based on direct observation of events. The document is unreliable and unsuitable to prove facts it purports to prove, and it is inadmissible pursuant to Rule 87(3)(c). Further, the author of this document is not presently scheduled to testify in Case 002/01. Because Mr. IENG Sary has not been afforded his absolute right under Rule 84(1) to confront the author of this article, this document is also inadmissible pursuant to Rule 87(3)(d). Should this document be admitted, the Defence submits that limited weight, if any, should be given to it unless the content of the document can be verified or supported through independent indicia. For further argument, <i>see</i> IENG Sary's Objections to the Admissibility of Certain Categories of Documents, 6 September 2011, E114, paras. 1 (Standards for the admission of documentary evidence set by the Establishment Law), 7-9 (Reliability), 11 (Relevance), 18-19 (Reports, articles and non-contemporaneous documents).
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76	Int'l Media Report	14 December 1977	International Media Report entitled "Communist Purge Unabated in Cambodia" (Los Angeles Times)	E190.1.350	Describes continuous purges of enemies and DK cadres and political figures since March 1977.	VII. FACTUAL FINDINGS OF JOINT CRIMINAL ENTERPRISE [41:156 to 220], "Purges" [52:192 to 204], Purge of the Old and New North Zones [52:193 to 198], D. TREATMENT OF TARGETED GROUPS [55:205 to 215]	The Defence recognizes that the Trial Chamber has previously found that "material such as analytical reports, books, documentary films, and media articles may be relevant and will not be excluded as a category" (E185, para. 21(5)). However, the Defence submits that media articles cannot be accepted at face value as being accurate or objective, especially when the journalists may have been engaged by governments to present a particular version of the events or even to formulate disinformation. Simply, it is virtually impossible to test the validity of media articles without, at a minimum, adducing evidence from the author. It is impossible to verify the reliability of the reporting contained herein. The article contains information and conclusions not based on direct observation of events. The document is unreliable and unsuitable to prove facts it purports to prove, and it is inadmissible pursuant to Rule 87(3)(c). Further, the author of this document is not presently scheduled to testify in Case 002/01. Because Mr. IENG Sary has not been afforded his absolute right under Rule 84(1) to confront the author of this article, this document is also inadmissible pursuant to Rule 87(3)(d). Should this document be admitted, the Defence submits that limited weight, if any, should be given to it unless the content of the document can be verified or supported through independent indicia. For further argument, <i>see</i> IENG Sary's Objections to the Admissibility of Certain Categories of Documents, 6 September 2011, E114, paras. 1 (Standards for the admission of documentary evidence set by the Establishment Law), 7-9 (Reliability), 11 (Relevance), 18-19 (Reports, articles and non-contemporaneous documents).
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77	Int'l Media Report	1978	International Media Report entitled "The Prisoner of Phnom Penh" (Asiaweek)	E190.1.351	Describes a banquet attended by KHIEU Samphan alias Haem as Chairman of the State Presidium, members of MSA, other Khmer Rouge ministers.	B. IENG SARY [250:994 to 1125], Roles and Functions [251:1001 to 1017], Deputy Prime Minister for Foreign Affairs [252:1005 to 1014], Association with Other CPK Senior Leaders [255:1016 to 1017], C. KHIEU SAMPHAN [284:1126 to 1200], Background [285:1126 to 1130], President of the State Presidium [287:1135 to 1138], Association with Other CPK Leaders [291:1151 to 1152], D. IENG THIRITH [304:1201 to 1298], Associations with Other CPK leaders [309:1224 to 1226]	The Defence recognizes that the Trial Chamber has previously found that "material such as analytical reports, books, documentary films, and media articles may be relevant and will not be excluded as a category" (E185, para. 21(5)). However, the Defence submits that media articles cannot be accepted at face value as being accurate or objective, especially when the journalists may have been engaged by governments to present a particular version of the events or even to formulate disinformation. Simply, it is virtually impossible to test the validity of media articles without, at a minimum, adducing evidence from the author. It is impossible to verify the reliability of the reporting contained herein. The article contains information and conclusions not based on direct observation of events. The document is unreliable and unsuitable to prove facts it purports to prove, and it is inadmissible pursuant to Rule 87(3)(c). Further, the author of this document is not presently scheduled to testify in Case 002/01. Because Mr. IENG Sary has not been afforded his absolute right under Rule 84(1) to confront the author of this article, this document is also inadmissible pursuant to Rule 87(3)(d). Should this document be admitted, the Defence submits that limited weight, if any, should be given to it unless the content of the document can be verified or supported through independent indicia. For further argument, <i>see</i> IENG Sary's Objections to the Admissibility of Certain Categories of Documents, 6 September 2011, E114, paras. 1 (Standards for the admission of documentary evidence set by the Establishment Law), 7-9 (Reliability), 11 (Relevance), 18-19 (Reports, articles and non-contemporaneous documents).
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78	Int'l Media Report	19 January 1978	International Media Report entitled "China, in Apparent Gesture of Support, Sends Official to Cambodia" (New York Times)	E190.1.352	Details the visit of a Chinese official to Phnom Penh in relation to the DK - Socialist Republic of Vietnam conflict and the deaths of hundreds of thousands of people during the DK regime.	VI. ARMED CONFLICT [40:150 to 155], VII. FACTUAL FINDINGS OF JOINT CRIMINAL ENTERPRISE [41:156 to 220], C. SECURITY CENTRES AND EXECUTION SITES [47:178 to 204]	The Defence recognizes that the Trial Chamber has previously found that "material such as analytical reports, books, documentary films, and media articles may be relevant and will not be excluded as a category" (E185, para. 21(5)). However, the Defence submits that media articles cannot be accepted at face value as being accurate or objective, especially when the journalists may have been engaged by governments to present a particular version of the events or even to formulate disinformation. Simply, it is virtually impossible to test the validity of media articles without, at a minimum, adducing evidence from the author. It is impossible to verify the reliability of the reporting contained herein. The article contains information and conclusions not based on direct observation of events. The document is unreliable and unsuitable to prove facts it purports to prove, and it is inadmissible pursuant to Rule 87(3)(c). Further, the author of this document is not presently scheduled to testify in Case 002/01. Because Mr. IENG Sary has not been afforded his absolute right under Rule 84(1) to confront the author of this article, this document is also inadmissible pursuant to Rule 87(3)(d). Should this document be admitted, the Defence submits that limited weight, if any, should be given to it unless the content of the document can be verified or supported through independent indicia. For further argument, <i>see</i> IENG Sary's Objections to the Admissibility of Certain Categories of Documents, 6 September 2011, E114, paras. 1 (Standards for the admission of documentary evidence set by the Establishment Law), 7-9 (Reliability), 11 (Relevance), 18-19 (Reports, articles and non-contemporaneous documents).
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79	Int'l Media Report	19 February 1978	International Media Report entitled "The Unknown Dimensions of the Cambodian Tragedy" (Washington Post)	E190.1.353	Describes the uncertainty amongst American analysts about the situation in Cambodia in 1978 though there are estimates that many people have died and many agree that the Khmer Rouge are running the most brutal regime since the Nazis and are authors of widespread crimes.	VII. FACTUAL FINDINGS OF JOINT CRIMINAL ENTERPRISE [41:156 to 220], B. COOPERATIVES AND WORKSITES [44:168 to 177], C. SECURITY CENTRES AND EXECUTION SITES [47:178 to 204], Widespread or Systematic [335:1352to1361]	The Defence recognizes that the Trial Chamber has previously found that "material such as analytical reports, books, documentary films, and media articles may be relevant and will not be excluded as a category" (E185, para. 21(5)). However, the Defence submits that media articles cannot be accepted at face value as being accurate or objective, especially when the journalists may have been engaged by governments to present a particular version of the events or even to formulate disinformation. Simply, it is virtually impossible to test the validity of media articles without, at a minimum, adducing evidence from the author. It is impossible to verify the reliability of the reporting contained herein. The article contains information and conclusions not based on direct observation of events. The document is unreliable and unsuitable to prove facts it purports to prove, and it is inadmissible pursuant to Rule 87(3)(c). Further, the author of this document is not presently scheduled to testify in Case 002/01. Because Mr. IENG Sary has not been afforded his absolute right under Rule 84(1) to confront the author of this article, this document is also inadmissible pursuant to Rule 87(3)(d). Should this document be admitted, the Defence submits that limited weight, if any, should be given to it unless the content of the document can be verified or supported through independent indicia. For further argument, <i>see</i> IENG Sary's Objections to the Admissibility of Certain Categories of Documents, 6 September 2011, E114, paras. 1 (Standards for the admission of documentary evidence set by the Establishment Law), 7-9 (Reliability), 11 (Relevance), 18-19 (Reports, articles and non-contemporaneous documents).
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80	Int'l Media Report	24 March 1978	International Media Report entitled "Yugoslavs, After Rare Tour, Tell of a Primitive Cambodia" (New York Times)	E190.1.354	Describes the experience of the first European journalists permitted to enter DK. Observations included the general decay of the country, poor work conditions, lack of education, functioning of DK communication, and absence of a currency system in 1978; also describes Pol Pot's claim that the food supply was abundant.	I. HISTORICAL BACKGROUND [13:18 to 32], II. ADMINISTRATIVE STRUCTURES (CENTRE) [16:33 to 63], IV. COMMUNICATION STRUCTURE [25:72 to 112], Telegram Communication [29:93 to 98], Print Media [30:99 to 104], VII. FACTUAL FINDINGS OF JOINT CRIMINAL ENTERPRISE [41:156 to 220], B. COOPERATIVES AND WORKSITES [44:168 to 177]	The Defence recognizes that the Trial Chamber has previously found that "material such as analytical reports, books, documentary films, and media articles may be relevant and will not be excluded as a category" (E185, para. 21(5)). However, the Defence submits that media articles cannot be accepted at face value as being accurate or objective, especially when the journalists may have been engaged by governments to present a particular version of the events or even to formulate disinformation. Simply, it is virtually impossible to test the validity of media articles without, at a minimum, adducing evidence from the author. It is impossible to verify the reliability of the reporting contained herein. The article contains information and conclusions not based on direct observation of events. The document is unreliable and unsuitable to prove facts it purports to prove, and it is inadmissible pursuant to Rule 87(3)(c). Further, the author of this document is not presently scheduled to testify in Case 002/01. Because Mr. IENG Sary has not been afforded his absolute right under Rule 84(1) to confront the author of this article, this document is also inadmissible pursuant to Rule 87(3)(d). Should this document be admitted, the Defence submits that limited weight, if any, should be given to it unless the content of the document can be verified or supported through independent indicia. For further argument, <i>see</i> IENG Sary's Objections to the Admissibility of Certain Categories of Documents, 6 September 2011, E114, paras. 1 (Standards for the admission of documentary evidence set by the Establishment Law), 7-9 (Reliability), 11 (Relevance), 18-19 (Reports, articles and non-contemporaneous documents).
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81	Int'l Media Report	24 March 1978	International Media Report entitled "Yugoslavs, After Rare Tour, Tell of a Primitive Cambodia" (New York Times)	E190.1.355	Describes a visit of Yugoslavian journalists to DK. Details their observations of forced labour and poor living conditions.	B. MEANS OF COMMUNICATION [28:90 to 112], Political and Education Material [30:99 to 112], Print Media [30:99 to 104]	The Defence recognizes that the Trial Chamber has previously found that "material such as analytical reports, books, documentary films, and media articles may be relevant and will not be excluded as a category" (E185, para. 21(5)). However, the Defence submits that media articles cannot be accepted at face value as being accurate or objective, especially when the journalists may have been engaged by governments to present a particular version of the events or even to formulate disinformation. Simply, it is virtually impossible to test the validity of media articles without, at a minimum, adducing evidence from the author. It is impossible to verify the reliability of the reporting contained herein. The article contains information and conclusions not based on direct observation of events. The document is unreliable and unsuitable to prove facts it purports to prove, and it is inadmissible pursuant to Rule 87(3)(c). Further, the author of this document is not presently scheduled to testify in Case 002/01. Because Mr. IENG Sary has not been afforded his absolute right under Rule 84(1) to confront the author of this article, this document is also inadmissible pursuant to Rule 87(3)(d). Should this document be admitted, the Defence submits that limited weight, if any, should be given to it unless the content of the document can be verified or supported through independent indicia. For further argument, <i>see</i> IENG Sary's Objections to the Admissibility of Certain Categories of Documents, 6 September 2011, E114, paras. 1 (Standards for the admission of documentary evidence set by the Establishment Law), 7-9 (Reliability), 11 (Relevance), 18-19 (Reports, articles and non-contemporaneous documents).
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82	Int'l Media Report	20 April 1978	International Media Report entitled "As Many as 1 Million Feared Dead in Cambodian 'Holocaust'" (Washington Post)	E190.1.356	Describes the situation in DK as a "reign of terror" where one million Cambodians have been slaughtered and maybe one million more have died from starvation and disease. Describes an armed conflict between DK and Socialist Republic of Vietnam.	VI. ARMED CONFLICT [40:150 to 155], VII. FACTUAL FINDINGS OF JOINT CRIMINAL ENTERPRISE [41:156 to 220], B. COOPERATIVES AND WORKSITES [44:168 to 177]	The Defence recognizes that the Trial Chamber has previously found that "material such as analytical reports, books, documentary films, and media articles may be relevant and will not be excluded as a category" (E185, para. 21(5)). However, the Defence submits that media articles cannot be accepted at face value as being accurate or objective, especially when the journalists may have been engaged by governments to present a particular version of the events or even to formulate disinformation. Simply, it is virtually impossible to test the validity of media articles without, at a minimum, adducing evidence from the author. It is impossible to verify the reliability of the reporting contained herein. The article contains information and conclusions not based on direct observation of events. The document is unreliable and unsuitable to prove facts it purports to prove, and it is inadmissible pursuant to Rule 87(3)(c). Further, the author of this document is not presently scheduled to testify in Case 002/01. Because Mr. IENG Sary has not been afforded his absolute right under Rule 84(1) to confront the author of this article, this document is also inadmissible pursuant to Rule 87(3)(d). Should this document be admitted, the Defence submits that limited weight, if any, should be given to it unless the content of the document can be verified or supported through independent indicia. For further argument, <i>see</i> IENG Sary's Objections to the Admissibility of Certain Categories of Documents, 6 September 2011, E114, paras. 1 (Standards for the admission of documentary evidence set by the Establishment Law), 7-9 (Reliability), 11 (Relevance), 18-19 (Reports, articles and non-contemporaneous documents).
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83	Int'l Media Report	22 April 1978	International Media Report entitled "Carter Assails Cambodia as 'Worst Violator' of Rights" (Los Angeles Times)	E190.1.357	Details US condemnation of DK regime, and a UNHRC resolution calling on the regime to respond to allegations of human rights violations.	VII. FACTUAL FINDINGS OF JOINT CRIMINAL ENTERPRISE [41:156 to 220], C. SECURITY CENTRES AND EXECUTION SITES [47:178 to 204], D. TREATMENT OF TARGETED GROUPS [55:205 to 215]	The Defence recognizes that the Trial Chamber has previously found that "material such as analytical reports, books, documentary films, and media articles may be relevant and will not be excluded as a category" (E185, para. 21(5)). However, the Defence submits that media articles cannot be accepted at face value as being accurate or objective, especially when the journalists may have been engaged by governments to present a particular version of the events or even to formulate disinformation. Simply, it is virtually impossible to test the validity of media articles without, at a minimum, adducing evidence from the author. It is impossible to verify the reliability of the reporting contained herein. The article contains information and conclusions not based on direct observation of events. The document is unreliable and unsuitable to prove facts it purports to prove, and it is inadmissible pursuant to Rule 87(3)(c). Further, the author of this document is not presently scheduled to testify in Case 002/01. Because Mr. IENG Sary has not been afforded his absolute right under Rule 84(1) to confront the author of this article, this document is also inadmissible pursuant to Rule 87(3)(d). Should this document be admitted, the Defence submits that limited weight, if any, should be given to it unless the content of the document can be verified or supported through independent indicia. For further argument, <i>see</i> IENG Sary's Objections to the Admissibility of Certain Categories of Documents, 6 September 2011, E114, paras. 1 (Standards for the admission of documentary evidence set by the Establishment Law), 7-9 (Reliability), 11 (Relevance), 18-19 (Reports, articles and non-contemporaneous documents).
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84	Int'l Media Report	22 April 1978	International Media Report entitled "President Charges Cambodia Regime Worst on Rights" (Washington Post)	E190.1.358	Describes U.S. President Carter condemning the Human Rights situation in DK; says that DK refugees have reported mass killings, inhumane treatment, total abolition of political and religious freedom, and deprivation of food and health care.	VII. FACTUAL FINDINGS OF JOINT CRIMINAL ENTERPRISE [41:156 to 220], B. COOPERATIVES AND WORKSITES [44:168 to 177], C. SECURITY CENTRES AND EXECUTION SITES [47:178 to 204], Treatment of Buddhists [184:740 to 744], Treatment of the Cham [186:745 to 790], D. IENG THIRITH [304:1201 to 1298], Roles and Functions [305:1207 to 1226]	The Defence recognizes that the Trial Chamber has previously found that "material such as analytical reports, books, documentary films, and media articles may be relevant and will not be excluded as a category" (E185, para. 21(5)). However, the Defence submits that media articles cannot be accepted at face value as being accurate or objective, especially when the journalists may have been engaged by governments to present a particular version of the events or even to formulate disinformation. Simply, it is virtually impossible to test the validity of media articles without, at a minimum, adducing evidence from the author. It is impossible to verify the reliability of the reporting contained herein. The article contains information and conclusions not based on direct observation of events. The document is unreliable and unsuitable to prove facts it purports to prove, and it is inadmissible pursuant to Rule 87(3)(c). Further, the author of this document is not presently scheduled to testify in Case 002/01. Because Mr. IENG Sary has not been afforded his absolute right under Rule 84(1) to confront the author of this article, this document is also inadmissible pursuant to Rule 87(3)(d). Should this document be admitted, the Defence submits that limited weight, if any, should be given to it unless the content of the document can be verified or supported through independent indicia. For further argument, <i>see</i> IENG Sary's Objections to the Admissibility of Certain Categories of Documents, 6 September 2011, E114, paras. 1 (Standards for the admission of documentary evidence set by the Establishment Law), 7-9 (Reliability), 11 (Relevance), 18-19 (Reports, articles and non-contemporaneous documents).
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85	Int'l Media Report	23 April 1978	International Media Report entitled "Silence is Guilt" (New York Times)	E190.1.359	Details forced evacuation of Phnom Penh and compares the situation in DK to Nazi Germany.	VII. FACTUAL FINDINGS OF JOINT CRIMINAL ENTERPRISE [41:156 to 220], D. TREATMENT OF TARGETED GROUPS [55:205 to 215], Movement of the Population from Phnom Penh (Phase 1) [60:221 to 261], Treatment of Vietnamese [196:791 to 841]	The Defence recognizes that the Trial Chamber has previously found that "material such as analytical reports, books, documentary films, and media articles may be relevant and will not be excluded as a category" (E185, para. 21(5)). However, the Defence submits that media articles cannot be accepted at face value as being accurate or objective, especially when the journalists may have been engaged by governments to present a particular version of the events or even to formulate disinformation. Simply, it is virtually impossible to test the validity of media articles without, at a minimum, adducing evidence from the author. It is impossible to verify the reliability of the reporting contained herein. The article contains information and conclusions not based on direct observation of events. The document is unreliable and unsuitable to prove facts it purports to prove, and it is inadmissible pursuant to Rule 87(3)(c). Further, the author of this document is not presently scheduled to testify in Case 002/01. Because Mr. IENG Sary has not been afforded his absolute right under Rule 84(1) to confront the author of this article, this document is also inadmissible pursuant to Rule 87(3)(d). Should this document be admitted, the Defence submits that limited weight, if any, should be given to it unless the content of the document can be verified or supported through independent indicia. For further argument, <i>see</i> IENG Sary's Objections to the Admissibility of Certain Categories of Documents, 6 September 2011, E114, paras. 1 (Standards for the admission of documentary evidence set by the Establishment Law), 7-9 (Reliability), 11 (Relevance), 18-19 (Reports, articles and non-contemporaneous documents).
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86	Int'l Media Report	24 April 1978	International Media Report entitled "Cambodia's New Tragedy" (Washington Post)	E190.1.360	Describes the evacuation of cities, forced labour and International Armed Conflict between DK and Socialist Republic of Vietnam.	VI. ARMED CONFLICT [40:150 to 155], VII. FACTUAL FINDINGS OF JOINT CRIMINAL ENTERPRISE [41:156 to 220], A. MOVEMENT OF THE POPULATION [42:160 to 167], B. COOPERATIVES AND WORKSITES [44:168 to 177]	The Defence recognizes that the Trial Chamber has previously found that "material such as analytical reports, books, documentary films, and media articles may be relevant and will not be excluded as a category" (E185, para. 21(5)). However, the Defence submits that media articles cannot be accepted at face value as being accurate or objective, especially when the journalists may have been engaged by governments to present a particular version of the events or even to formulate disinformation. Simply, it is virtually impossible to test the validity of media articles without, at a minimum, adducing evidence from the author. It is impossible to verify the reliability of the reporting contained herein. The article contains information and conclusions not based on direct observation of events. The document is unreliable and unsuitable to prove facts it purports to prove, and it is inadmissible pursuant to Rule 87(3)(c). Further, the author of this document is not presently scheduled to testify in Case 002/01. Because Mr. IENG Sary has not been afforded his absolute right under Rule 84(1) to confront the author of this article, this document is also inadmissible pursuant to Rule 87(3)(d). Should this document be admitted, the Defence submits that limited weight, if any, should be given to it unless the content of the document can be verified or supported through independent indicia. For further argument, <i>see</i> IENG Sary's Objections to the Admissibility of Certain Categories of Documents, 6 September 2011, E114, paras. 1 (Standards for the admission of documentary evidence set by the Establishment Law), 7-9 (Reliability), 11 (Relevance), 18-19 (Reports, articles and non-contemporaneous documents).
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87	Int'l Media Report	26 April 1978	International Media Report entitled "Cambodia - 'Worst Violator'" (Chicago Tribune)	E190.1.361	Describes U.S. President Carter condemning the Human Rights situation in DK; says that DK refugees have reported mass killings, inhumane treatment, total abolition of political and religious freedom, and deprivation of food and health care.	VII. FACTUAL FINDINGS OF JOINT CRIMINAL ENTERPRISE [41:156 to 220], B. COOPERATIVES AND WORKSITES [44:168 to 177], C. SECURITY CENTRES AND EXECUTION SITES [47:178 to 204], Treatment of Buddhists [184:740 to 744], Treatment of the Cham [186:745 to 790], D. IENG THIRITH [304:1201 to 1298], Roles and Functions [305:1207 to 1226]	The Defence recognizes that the Trial Chamber has previously found that "material such as analytical reports, books, documentary films, and media articles may be relevant and will not be excluded as a category" (E185, para. 21(5)). However, the Defence submits that media articles cannot be accepted at face value as being accurate or objective, especially when the journalists may have been engaged by governments to present a particular version of the events or even to formulate disinformation. Simply, it is virtually impossible to test the validity of media articles without, at a minimum, adducing evidence from the author. It is impossible to verify the reliability of the reporting contained herein. The article contains information and conclusions not based on direct observation of events. The document is unreliable and unsuitable to prove facts it purports to prove, and it is inadmissible pursuant to Rule 87(3)(c). Further, the author of this document is not presently scheduled to testify in Case 002/01. Because Mr. IENG Sary has not been afforded his absolute right under Rule 84(1) to confront the author of this article, this document is also inadmissible pursuant to Rule 87(3)(d). Should this document be admitted, the Defence submits that limited weight, if any, should be given to it unless the content of the document can be verified or supported through independent indicia. For further argument, <i>see</i> IENG Sary's Objections to the Admissibility of Certain Categories of Documents, 6 September 2011, E114, paras. 1 (Standards for the admission of documentary evidence set by the Establishment Law), 7-9 (Reliability), 11 (Relevance), 18-19 (Reports, articles and non-contemporaneous documents).
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88	Int'l Media Report	29 April 1978	International Media Report entitled "From Bad to Worse" (The Economist)	E190.1.362	Describes a panel hearing of Cambodian refugees. Describes lack of food and medicine, executions and purges and that the revolution was "turned into a murderous delirium" with conditions worsening over time.	VII. FACTUAL FINDINGS OF JOINT CRIMINAL ENTERPRISE [41:156 to 220], B. COOPERATIVES AND WORKSITES [44:168 to 177], "Purges" [52:192 to 204], D. TREATMENT OF TARGETED GROUPS [55:205 to 215]	The Defence recognizes that the Trial Chamber has previously found that "material such as analytical reports, books, documentary films, and media articles may be relevant and will not be excluded as a category" (E185, para. 21(5)). However, the Defence submits that media articles cannot be accepted at face value as being accurate or objective, especially when the journalists may have been engaged by governments to present a particular version of the events or even to formulate disinformation. Simply, it is virtually impossible to test the validity of media articles without, at a minimum, adducing evidence from the author. It is impossible to verify the reliability of the reporting contained herein. The article contains information and conclusions not based on direct observation of events. The document is unreliable and unsuitable to prove facts it purports to prove, and it is inadmissible pursuant to Rule 87(3)(c). Further, the author of this document is not presently scheduled to testify in Case 002/01. Because Mr. IENG Sary has not been afforded his absolute right under Rule 84(1) to confront the author of this article, this document is also inadmissible pursuant to Rule 87(3)(d). Should this document be admitted, the Defence submits that limited weight, if any, should be given to it unless the content of the document can be verified or supported through independent indicia. For further argument, <i>see</i> IENG Sary's Objections to the Admissibility of Certain Categories of Documents, 6 September 2011, E114, paras. 1 (Standards for the admission of documentary evidence set by the Establishment Law), 7-9 (Reliability), 11 (Relevance), 18-19 (Reports, articles and non-contemporaneous documents).
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89	Int'l Media Report	02 May 1978	International Media Report entitled "In Cambodia, Obliterating a Culture" (Washington Post)	E190.1.363	Reports on genocide in Cambodia responsible for the deaths of between 1.8 million and 2.5 million.	VII. FACTUAL FINDINGS OF JOINT CRIMINAL ENTERPRISE [41:156 to 220], C. SECURITY CENTRES AND EXECUTION SITES [47:178 to 204]	The Defence recognizes that the Trial Chamber has previously found that "material such as analytical reports, books, documentary films, and media articles may be relevant and will not be excluded as a category" (E185, para. 21(5)). However, the Defence submits that media articles cannot be accepted at face value as being accurate or objective, especially when the journalists may have been engaged by governments to present a particular version of the events or even to formulate disinformation. Simply, it is virtually impossible to test the validity of media articles without, at a minimum, adducing evidence from the author. It is impossible to verify the reliability of the reporting contained herein. The article contains information and conclusions not based on direct observation of events. The document is unreliable and unsuitable to prove facts it purports to prove, and it is inadmissible pursuant to Rule 87(3)(c). Further, the author of this document is not presently scheduled to testify in Case 002/01. Because Mr. IENG Sary has not been afforded his absolute right under Rule 84(1) to confront the author of this article, this document is also inadmissible pursuant to Rule 87(3)(d). Should this document be admitted, the Defence submits that limited weight, if any, should be given to it unless the content of the document can be verified or supported through independent indicia. For further argument, <i>see</i> IENG Sary's Objections to the Admissibility of Certain Categories of Documents, 6 September 2011, E114, paras. 1 (Standards for the admission of documentary evidence set by the Establishment Law), 7-9 (Reliability), 11 (Relevance), 18-19 (Reports, articles and non-contemporaneous documents).
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90	Int'l Media Report	03 May 1978	International Media Report entitled "A Modern Day Holocaust" (Washington Post)	E190.1.364	Describes shootings, beatings, forced labour and starvation in DK. Describes the evacuation of Phnom Penh and deaths during that march.	VI. ARMED CONFLICT [40:150 to 155], VII. FACTUAL FINDINGS OF JOINT CRIMINAL ENTERPRISE [41:156 to 220], A. MOVEMENT OF THE POPULATION [42:160 to 167], B. COOPERATIVES AND WORKSITES [44:168 to 177]	The Defence recognizes that the Trial Chamber has previously found that "material such as analytical reports, books, documentary films, and media articles may be relevant and will not be excluded as a category" (E185, para. 21(5)). However, the Defence submits that media articles cannot be accepted at face value as being accurate or objective, especially when the journalists may have been engaged by governments to present a particular version of the events or even to formulate disinformation. Simply, it is virtually impossible to test the validity of media articles without, at a minimum, adducing evidence from the author. It is impossible to verify the reliability of the reporting contained herein. The article contains information and conclusions not based on direct observation of events. The document is unreliable and unsuitable to prove facts it purports to prove, and it is inadmissible pursuant to Rule 87(3)(c). Further, the author of this document is not presently scheduled to testify in Case 002/01. Because Mr. IENG Sary has not been afforded his absolute right under Rule 84(1) to confront the author of this article, this document is also inadmissible pursuant to Rule 87(3)(d). Should this document be admitted, the Defence submits that limited weight, if any, should be given to it unless the content of the document can be verified or supported through independent indicia. For further argument, <i>see</i> IENG Sary's Objections to the Admissibility of Certain Categories of Documents, 6 September 2011, E114, paras. 1 (Standards for the admission of documentary evidence set by the Establishment Law), 7-9 (Reliability), 11 (Relevance), 18-19 (Reports, articles and non-contemporaneous documents).
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91	Int'l Media Report	07 May 1978	International Media Report entitled "Cambodians: An Endangered Species" (Los Angeles Times)	E190.1.365	Describes the estimated numbers of Cambodians dying from forced transfers, forced labour, disease and starvation, and other inhumane conditions.	VI. ARMED CONFLICT [40:150 to 155], VII. FACTUAL FINDINGS OF JOINT CRIMINAL ENTERPRISE [41:156 to 220], A. MOVEMENT OF THE POPULATION [42:160 to 167], B. COOPERATIVES AND WORKSITES [44:168 to 177]	The Defence recognizes that the Trial Chamber has previously found that "material such as analytical reports, books, documentary films, and media articles may be relevant and will not be excluded as a category" (E185, para. 21(5)). However, the Defence submits that media articles cannot be accepted at face value as being accurate or objective, especially when the journalists may have been engaged by governments to present a particular version of the events or even to formulate disinformation. Simply, it is virtually impossible to test the validity of media articles without, at a minimum, adducing evidence from the author. It is impossible to verify the reliability of the reporting contained herein. The article contains information and conclusions not based on direct observation of events. The document is unreliable and unsuitable to prove facts it purports to prove, and it is inadmissible pursuant to Rule 87(3)(c). Further, the author of this document is not presently scheduled to testify in Case 002/01. Because Mr. IENG Sary has not been afforded his absolute right under Rule 84(1) to confront the author of this article, this document is also inadmissible pursuant to Rule 87(3)(d). Should this document be admitted, the Defence submits that limited weight, if any, should be given to it unless the content of the document can be verified or supported through independent indicia. For further argument, <i>see</i> IENG Sary's Objections to the Admissibility of Certain Categories of Documents, 6 September 2011, E114, paras. 1 (Standards for the admission of documentary evidence set by the Establishment Law), 7-9 (Reliability), 11 (Relevance), 18-19 (Reports, articles and non-contemporaneous documents).
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92	Int'l Media Report	10 May 1978	International Media Report entitled "The Terror in Cambodia" (Wall Street Journal)	E190.1.366	Describes the evacuation of cities including the killing of people too sick to walk.	VII. FACTUAL FINDINGS OF JOINT CRIMINAL ENTERPRISE [41:156 to 220], A. MOVEMENT OF THE POPULATION [42:160 to 167]	The Defence recognizes that the Trial Chamber has previously found that "material such as analytical reports, books, documentary films, and media articles may be relevant and will not be excluded as a category" (E185, para. 21(5)). However, the Defence submits that media articles cannot be accepted at face value as being accurate or objective, especially when the journalists may have been engaged by governments to present a particular version of the events or even to formulate disinformation. Simply, it is virtually impossible to test the validity of media articles without, at a minimum, adducing evidence from the author. It is impossible to verify the reliability of the reporting contained herein. The article contains information and conclusions not based on direct observation of events. The document is unreliable and unsuitable to prove facts it purports to prove, and it is inadmissible pursuant to Rule 87(3)(c). Further, the author of this document is not presently scheduled to testify in Case 002/01. Because Mr. IENG Sary has not been afforded his absolute right under Rule 84(1) to confront the author of this article, this document is also inadmissible pursuant to Rule 87(3)(d). Should this document be admitted, the Defence submits that limited weight, if any, should be given to it unless the content of the document can be verified or supported through independent indicia. For further argument, <i>see</i> IENG Sary's Objections to the Admissibility of Certain Categories of Documents, 6 September 2011, E114, paras. 1 (Standards for the admission of documentary evidence set by the Establishment Law), 7-9 (Reliability), 11 (Relevance), 18-19 (Reports, articles and non-contemporaneous documents).
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93	Int'l Media Report	12 May 1978	International Media Report entitled "The Banishment of Hope" (Los Angeles Times)	E190.1.367	An exiled Khmer Republic information minister describes the crisis in DK as a Holocaust, speaks of guarded village concentration camps, executions, deaths from starvation, diseases, abolition of religion and destruction of schools, and subsistence economy.	VII. FACTUAL FINDINGS OF JOINT CRIMINAL ENTERPRISE [41:156 to 220], B. COOPERATIVES AND WORKSITES [44:168 to 177], "Purges" [52:192 to 204], Movement of the Population from Phnom Penh (Phase 1) [60:221 to 261], Treatment of Buddhists [184:740 to 744]	The Defence recognizes that the Trial Chamber has previously found that "material such as analytical reports, books, documentary films, and media articles may be relevant and will not be excluded as a category" (E185, para. 21(5)). However, the Defence submits that media articles cannot be accepted at face value as being accurate or objective, especially when the journalists may have been engaged by governments to present a particular version of the events or even to formulate disinformation. Simply, it is virtually impossible to test the validity of media articles without, at a minimum, adducing evidence from the author. It is impossible to verify the reliability of the reporting contained herein. The article contains information and conclusions not based on direct observation of events. The document is unreliable and unsuitable to prove facts it purports to prove, and it is inadmissible pursuant to Rule 87(3)(c). Further, the author of this document is not presently scheduled to testify in Case 002/01. Because Mr. IENG Sary has not been afforded his absolute right under Rule 84(1) to confront the author of this article, this document is also inadmissible pursuant to Rule 87(3)(d). Should this document be admitted, the Defence submits that limited weight, if any, should be given to it unless the content of the document can be verified or supported through independent indicia. For further argument, <i>see</i> IENG Sary's Objections to the Admissibility of Certain Categories of Documents, 6 September 2011, E114, paras. 1 (Standards for the admission of documentary evidence set by the Establishment Law), 7-9 (Reliability), 11 (Relevance), 18-19 (Reports, articles and non-contemporaneous documents).
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94	Int'l Media Report	01 June 1978	International Media Report entitled "Widespread Bloodletting in Cambodia" (The Washington Post)	E190.1.368	Describes the role of senior leaders of DK, including IENG Sary alias Van as Minister of Foreign Affairs and KHIEU Samphan alias Haem as Head of State.	B. IENG SARY [250:994 to 1125], Roles and Functions [251:1001 to 1017], Deputy Prime Minister for Foreign Affairs [252:1005 to 1014], Association with Other CPK Senior Leaders [255:1016 to 1017], C. KHIEU SAMPHAN [284:1126 to 1200], Roles and Functions [286:1131 to 1152], President of the State Presidium [287:1135 to 1138], Association with Other CPK Leaders [291:1151 to 1152], D. IENG THIRITH [304:1201 to 1298], Associations with Other CPK leaders [309:1224 to 1226]	The Defence recognizes that the Trial Chamber has previously found that "material such as analytical reports, books, documentary films, and media articles may be relevant and will not be excluded as a category" (E185, para. 21(5)). However, the Defence submits that media articles cannot be accepted at face value as being accurate or objective, especially when the journalists may have been engaged by governments to present a particular version of the events or even to formulate disinformation. Simply, it is virtually impossible to test the validity of media articles without, at a minimum, adducing evidence from the author. It is impossible to verify the reliability of the reporting contained herein. The article contains information and conclusions not based on direct observation of events. The document is unreliable and unsuitable to prove facts it purports to prove, and it is inadmissible pursuant to Rule 87(3)(c). Further, the author of this document is not presently scheduled to testify in Case 002/01. Because Mr. IENG Sary has not been afforded his absolute right under Rule 84(1) to confront the author of this article, this document is also inadmissible pursuant to Rule 87(3)(d). Should this document be admitted, the Defence submits that limited weight, if any, should be given to it unless the content of the document can be verified or supported through independent indicia. For further argument, <i>see</i> IENG Sary's Objections to the Admissibility of Certain Categories of Documents, 6 September 2011, E114, paras. 1 (Standards for the admission of documentary evidence set by the Establishment Law), 7-9 (Reliability), 11 (Relevance), 18-19 (Reports, articles and non-contemporaneous documents).
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95	Int'l Media Report	09 June 1978	International Media Report entitled "Holocaust' Cambodians' Entry Urged" (Washington Post)	E190.1.369	Describes a recommendation to allow more Cambodian refugees into the US, calling the situation in Cambodia a "holocaust" and "the worst hell of all".	A. NUON CHEA [214:862 to 993], Participation in The Common Purpose [222:895 to 992], B. IENG SARY [250:994 to 1125], Participation in the Common Purpose [255:1018 to 1121], C. KHIEU SAMPHAN [284:1126 to 1200], Participation in the Common Purpose [291:1153 to 1199], D. IENG THIRITH [304:1201 to 1298], Participation in the Common Purpose [309:1227to1295]	The Defence recognizes that the Trial Chamber has previously found that "material such as analytical reports, books, documentary films, and media articles may be relevant and will not be excluded as a category" (E185, para. 21(5)). However, the Defence submits that media articles cannot be accepted at face value as being accurate or objective, especially when the journalists may have been engaged by governments to present a particular version of the events or even to formulate disinformation. Simply, it is virtually impossible to test the validity of media articles without, at a minimum, adducing evidence from the author. It is impossible to verify the reliability of the reporting contained herein. The article contains information and conclusions not based on direct observation of events. The document is unreliable and unsuitable to prove facts it purports to prove, and it is inadmissible pursuant to Rule 87(3)(c). Further, the author of this document is not presently scheduled to testify in Case 002/01. Because Mr. IENG Sary has not been afforded his absolute right under Rule 84(1) to confront the author of this article, this document is also inadmissible pursuant to Rule 87(3)(d). Should this document be admitted, the Defence submits that limited weight, if any, should be given to it unless the content of the document can be verified or supported through independent indicia. For further argument, <i>see</i> IENG Sary's Objections to the Admissibility of Certain Categories of Documents, 6 September 2011, E114, paras. 1 (Standards for the admission of documentary evidence set by the Establishment Law), 7-9 (Reliability), 11 (Relevance), 18-19 (Reports, articles and non-contemporaneous documents).
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96	Int'l Media Report	09 July 1978	International Media Report entitled "Cambodia: Voices from the Silence" (Washington Post)	E190.1.370	Book Review of "Cambodia: Year Zero" from François PONCHAUD picturing the Cambodian revolution as the bloodiest of the century; Phnom Penh forced evacuation; inhumane conditions and executions.	I. HISTORICAL BACKGROUND [13:18 to 32], VII. FACTUAL FINDINGS OF JOINT CRIMINAL ENTERPRISE [41:156 to 220], A. MOVEMENT OF THE POPULATION [42:160 to 167], B. COOPERATIVES AND WORKSITES [44:168 to 177], C. SECURITY CENTRES AND EXECUTION SITES [47:178 to 204], Movement of the Population from Phnom Penh (Phase 1) [60:221 to 261]	The Defence recognizes that the Trial Chamber has previously found that "material such as analytical reports, books, documentary films, and media articles may be relevant and will not be excluded as a category" (E185, para. 21(5)). However, the Defence submits that media articles cannot be accepted at face value as being accurate or objective, especially when the journalists may have been engaged by governments to present a particular version of the events or even to formulate disinformation. Simply, it is virtually impossible to test the validity of media articles without, at a minimum, adducing evidence from the author. It is impossible to verify the reliability of the reporting contained herein. The article contains information and conclusions not based on direct observation of events. The document is unreliable and unsuitable to prove facts it purports to prove, and it is inadmissible pursuant to Rule 87(3)(c). Further, the author of this document is not presently scheduled to testify in Case 002/01. Because Mr. IENG Sary has not been afforded his absolute right under Rule 84(1) to confront the author of this article, this document is also inadmissible pursuant to Rule 87(3)(d). Should this document be admitted, the Defence submits that limited weight, if any, should be given to it unless the content of the document can be verified or supported through independent indicia. For further argument, <i>see</i> IENG Sary's Objections to the Admissibility of Certain Categories of Documents, 6 September 2011, E114, paras. 1 (Standards for the admission of documentary evidence set by the Establishment Law), 7-9 (Reliability), 11 (Relevance), 18-19 (Reports, articles and non-contemporaneous documents).
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97	Int'l Media Report	22 July 1978	International Media Report entitled "World News Briefs: Cambodia Rejects Charges of Rights Violations" (New York Times)	E190.1.371	Details DK Government letter to United Nations denying allegations of human rights violations and executions and emphasizing achievements, while the British spoke of "systematic and arbitrary executions and many other gross violations of human rights"	VII. FACTUAL FINDINGS OF JOINT CRIMINAL ENTERPRISE [41:156 to 220], C. SECURITY CENTRES AND EXECUTION SITES [47:178 to 204], Widespread or Systematic [335:1352to1361]	The Defence recognizes that the Trial Chamber has previously found that "material such as analytical reports, books, documentary films, and media articles may be relevant and will not be excluded as a category" (E185, para. 21(5)). However, the Defence submits that media articles cannot be accepted at face value as being accurate or objective, especially when the journalists may have been engaged by governments to present a particular version of the events or even to formulate disinformation. Simply, it is virtually impossible to test the validity of media articles without, at a minimum, adducing evidence from the author. It is impossible to verify the reliability of the reporting contained herein. The article contains information and conclusions not based on direct observation of events. The document is unreliable and unsuitable to prove facts it purports to prove, and it is inadmissible pursuant to Rule 87(3)(c). Further, the author of this document is not presently scheduled to testify in Case 002/01. Because Mr. IENG Sary has not been afforded his absolute right under Rule 84(1) to confront the author of this article, this document is also inadmissible pursuant to Rule 87(3)(d). Should this document be admitted, the Defence submits that limited weight, if any, should be given to it unless the content of the document can be verified or supported through independent indicia. For further argument, <i>see</i> IENG Sary's Objections to the Admissibility of Certain Categories of Documents, 6 September 2011, E114, paras. 1 (Standards for the admission of documentary evidence set by the Establishment Law), 7-9 (Reliability), 11 (Relevance), 18-19 (Reports, articles and non-contemporaneous documents).
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98	Int'l Media Report	31 July 1978	International Media Report entitled "Surviving the Hard Way in Cambodia" (Washington Post)	E190.1.373	Report of a journalist account, describing extreme working conditions in DK; inadequate food and ineffective medicines; executions for minor misdemeanors; and strong government control over marriage.	VII. FACTUAL FINDINGS OF JOINT CRIMINAL ENTERPRISE [41:156 to 220], B. COOPERATIVES AND WORKSITES [44:168 to 177], E. THE REGULATION OF MARRIAGE [58:216 to 220], Regulation of Marriage [209:842 to 861]	The Defence recognizes that the Trial Chamber has previously found that "material such as analytical reports, books, documentary films, and media articles may be relevant and will not be excluded as a category" (E185, para. 21(5)). However, the Defence submits that media articles cannot be accepted at face value as being accurate or objective, especially when the journalists may have been engaged by governments to present a particular version of the events or even to formulate disinformation. Simply, it is virtually impossible to test the validity of media articles without, at a minimum, adducing evidence from the author. It is impossible to verify the reliability of the reporting contained herein. The article contains information and conclusions not based on direct observation of events. The document is unreliable and unsuitable to prove facts it purports to prove, and it is inadmissible pursuant to Rule 87(3)(c). Further, the author of this document is not presently scheduled to testify in Case 002/01. Because Mr. IENG Sary has not been afforded his absolute right under Rule 84(1) to confront the author of this article, this document is also inadmissible pursuant to Rule 87(3)(d). Should this document be admitted, the Defence submits that limited weight, if any, should be given to it unless the content of the document can be verified or supported through independent indicia. For further argument, <i>see</i> IENG Sary's Objections to the Admissibility of Certain Categories of Documents, 6 September 2011, E114, paras. 1 (Standards for the admission of documentary evidence set by the Establishment Law), 7-9 (Reliability), 11 (Relevance), 18-19 (Reports, articles and non-contemporaneous documents).
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99	Int'l Media Report	31 July 1978	International Media Report entitled "Surviving the Hard Way in Cambodia" (Washington Post)	E190.1.372	Describes living and working conditions in DK including people being either sent to reeducation or killed for complaining or failing to work as expected.	VII. FACTUAL FINDINGS OF JOINT CRIMINAL ENTERPRISE [41:156 to 220], B. COOPERATIVES AND WORKSITES [44:168 to 177], C. SECURITY CENTRES AND EXECUTION SITES [47:178 to 204]	The Defence recognizes that the Trial Chamber has previously found that "material such as analytical reports, books, documentary films, and media articles may be relevant and will not be excluded as a category" (E185, para. 21(5)). However, the Defence submits that media articles cannot be accepted at face value as being accurate or objective, especially when the journalists may have been engaged by governments to present a particular version of the events or even to formulate disinformation. Simply, it is virtually impossible to test the validity of media articles without, at a minimum, adducing evidence from the author. It is impossible to verify the reliability of the reporting contained herein. The article contains information and conclusions not based on direct observation of events. The document is unreliable and unsuitable to prove facts it purports to prove, and it is inadmissible pursuant to Rule 87(3)(c). Further, the author of this document is not presently scheduled to testify in Case 002/01. Because Mr. IENG Sary has not been afforded his absolute right under Rule 84(1) to confront the author of this article, this document is also inadmissible pursuant to Rule 87(3)(d). Should this document be admitted, the Defence submits that limited weight, if any, should be given to it unless the content of the document can be verified or supported through independent indicia. For further argument, <i>see</i> IENG Sary's Objections to the Admissibility of Certain Categories of Documents, 6 September 2011, E114, paras. 1 (Standards for the admission of documentary evidence set by the Establishment Law), 7-9 (Reliability), 11 (Relevance), 18-19 (Reports, articles and non-contemporaneous documents).
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100	Int'l Media Report	08 August 1978	International Media Report entitled "Third Cambodia purge throws wider net" (Financial Times)	E190.1.374	Report on new purge launched in Battambang (Northwest Zone), following earlier purges directed against intellectuals, Lon Nol officials and dissidents or traitors within the CPK. Report quotes a former cooperative chairman from Thma Puork District who describes orders from higher authorities to identify "suspect elements" and the arrests and replacement of local cadres.	VII. FACTUAL FINDINGS OF JOINT CRIMINAL ENTERPRISE [41:156 to 220], C. SECURITY CENTRES AND EXECUTION SITES [47:178 to 204], "Purges" [52:192 to 204], D. TREATMENT OF TARGETED GROUPS [55:205 to 215]	The Defence recognizes that the Trial Chamber has previously found that "material such as analytical reports, books, documentary films, and media articles may be relevant and will not be excluded as a category" (E185, para. 21(5)). However, the Defence submits that media articles cannot be accepted at face value as being accurate or objective, especially when the journalists may have been engaged by governments to present a particular version of the events or even to formulate disinformation. Simply, it is virtually impossible to test the validity of media articles without, at a minimum, adducing evidence from the author. It is impossible to verify the reliability of the reporting contained herein. The article contains information and conclusions not based on direct observation of events. The document is unreliable and unsuitable to prove facts it purports to prove, and it is inadmissible pursuant to Rule 87(3)(c). Further, the author of this document is not presently scheduled to testify in Case 002/01. Because Mr. IENG Sary has not been afforded his absolute right under Rule 84(1) to confront the author of this article, this document is also inadmissible pursuant to Rule 87(3)(d). Should this document be admitted, the Defence submits that limited weight, if any, should be given to it unless the content of the document can be verified or supported through independent indicia. For further argument, <i>see</i> IENG Sary's Objections to the Admissibility of Certain Categories of Documents, 6 September 2011, E114, paras. 1 (Standards for the admission of documentary evidence set by the Establishment Law), 7-9 (Reliability), 11 (Relevance), 18-19 (Reports, articles and non-contemporaneous documents).
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101	Int'l Media Report	09 August 1978	International Media Report entitled "Cambodia and World Opinion" (Chicago Tribune)	E190.1.375	Details IENG Sary alias Van's visits to Thailand and Yugoslavia as deputy Prime Minister and Minister of Foreign Affairs to represent DK regime.	VI. ARMED CONFLICT [40:150 to 155], B. IENG SARY [250:994 to 1125], Roles and Functions [251:1001 to 1017], Deputy Prime Minister for Foreign Affairs [252:1005 to 1014], Knowledge of Existence of an International Armed Conflict [284:1122 to 1125]	The Defence recognizes that the Trial Chamber has previously found that "material such as analytical reports, books, documentary films, and media articles may be relevant and will not be excluded as a category" (E185, para. 21(5)). However, the Defence submits that media articles cannot be accepted at face value as being accurate or objective, especially when the journalists may have been engaged by governments to present a particular version of the events or even to formulate disinformation. Simply, it is virtually impossible to test the validity of media articles without, at a minimum, adducing evidence from the author. It is impossible to verify the reliability of the reporting contained herein. The article contains information and conclusions not based on direct observation of events. The document is unreliable and unsuitable to prove facts it purports to prove, and it is inadmissible pursuant to Rule 87(3)(c). Further, the author of this document is not presently scheduled to testify in Case 002/01. Because Mr. IENG Sary has not been afforded his absolute right under Rule 84(1) to confront the author of this article, this document is also inadmissible pursuant to Rule 87(3)(d). Should this document be admitted, the Defence submits that limited weight, if any, should be given to it unless the content of the document can be verified or supported through independent indicia. For further argument, <i>see</i> IENG Sary's Objections to the Admissibility of Certain Categories of Documents, 6 September 2011, E114, paras. 1 (Standards for the admission of documentary evidence set by the Establishment Law), 7-9 (Reliability), 11 (Relevance), 18-19 (Reports, articles and non-contemporaneous documents).
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102	Int'l Media Report	22 August 1978	International Media Report entitled "McGovern Backs Anti-Cambodia Action" (Washington Post)	E190.1.376	Describes U.S. Senator McGovern backing Anti-Cambodia Action and qualifying the Cambodia situation as genocide; says that based on the percentage of persons who have died, this ""makes Hitler's operations look tame.""	VII. FACTUAL FINDINGS OF JOINT CRIMINAL ENTERPRISE [41:156 to 220], C. SECURITY CENTRES AND EXECUTION SITES [47:178 to 204]	The Defence recognizes that the Trial Chamber has previously found that "material such as analytical reports, books, documentary films, and media articles may be relevant and will not be excluded as a category" (E185, para. 21(5)). However, the Defence submits that media articles cannot be accepted at face value as being accurate or objective, especially when the journalists may have been engaged by governments to present a particular version of the events or even to formulate disinformation. Simply, it is virtually impossible to test the validity of media articles without, at a minimum, adducing evidence from the author. It is impossible to verify the reliability of the reporting contained herein. The article contains information and conclusions not based on direct observation of events. The document is unreliable and unsuitable to prove facts it purports to prove, and it is inadmissible pursuant to Rule 87(3)(c). Further, the author of this document is not presently scheduled to testify in Case 002/01. Because Mr. IENG Sary has not been afforded his absolute right under Rule 84(1) to confront the author of this article, this document is also inadmissible pursuant to Rule 87(3)(d). Should this document be admitted, the Defence submits that limited weight, if any, should be given to it unless the content of the document can be verified or supported through independent indicia. For further argument, <i>see</i> IENG Sary's Objections to the Admissibility of Certain Categories of Documents, 6 September 2011, E114, paras. 1 (Standards for the admission of documentary evidence set by the Establishment Law), 7-9 (Reliability), 11 (Relevance), 18-19 (Reports, articles and non-contemporaneous documents).
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103	Int'l Media Report	22 August 1978	International Media Report entitled "McGovern Urges World Act to Stop Cambodia Killing" (Chicago Tribune)	E190.1.377	Describes U.S. Senator McGovern backing Anti-Cambodia Action and qualifying the Cambodia situation as genocide; says that based on the percentage of persons who have died, this ""makes Hitler's operations look tame.""	VII. FACTUAL FINDINGS OF JOINT CRIMINAL ENTERPRISE [41:156 to 220], C. SECURITY CENTRES AND EXECUTION SITES [47:178 to 204]	The Defence recognizes that the Trial Chamber has previously found that "material such as analytical reports, books, documentary films, and media articles may be relevant and will not be excluded as a category" (E185, para. 21(5)). However, the Defence submits that media articles cannot be accepted at face value as being accurate or objective, especially when the journalists may have been engaged by governments to present a particular version of the events or even to formulate disinformation. Simply, it is virtually impossible to test the validity of media articles without, at a minimum, adducing evidence from the author. It is impossible to verify the reliability of the reporting contained herein. The article contains information and conclusions not based on direct observation of events. The document is unreliable and unsuitable to prove facts it purports to prove, and it is inadmissible pursuant to Rule 87(3)(c). Further, the author of this document is not presently scheduled to testify in Case 002/01. Because Mr. IENG Sary has not been afforded his absolute right under Rule 84(1) to confront the author of this article, this document is also inadmissible pursuant to Rule 87(3)(d). Should this document be admitted, the Defence submits that limited weight, if any, should be given to it unless the content of the document can be verified or supported through independent indicia. For further argument, <i>see</i> IENG Sary's Objections to the Admissibility of Certain Categories of Documents, 6 September 2011, E114, paras. 1 (Standards for the admission of documentary evidence set by the Establishment Law), 7-9 (Reliability), 11 (Relevance), 18-19 (Reports, articles and non-contemporaneous documents).
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104	Int'l Media Report	26 August 1978	International Media Report entitled "2d Cambodia Plea" (Chicago Tribune)	E190.1.378	Details US Senator George McGovern's calls for the US to refer the situation in DK to UN Security Council to know if is genocide. Quotes a figure of two million Cambodians destroyed.	VII. FACTUAL FINDINGS OF JOINT CRIMINAL ENTERPRISE [41:156 to 220], C. SECURITY CENTRES AND EXECUTION SITES [47:178 to 204]	The Defence recognizes that the Trial Chamber has previously found that "material such as analytical reports, books, documentary films, and media articles may be relevant and will not be excluded as a category" (E185, para. 21(5)). However, the Defence submits that media articles cannot be accepted at face value as being accurate or objective, especially when the journalists may have been engaged by governments to present a particular version of the events or even to formulate disinformation. Simply, it is virtually impossible to test the validity of media articles without, at a minimum, adducing evidence from the author. It is impossible to verify the reliability of the reporting contained herein. The article contains information and conclusions not based on direct observation of events. The document is unreliable and unsuitable to prove facts it purports to prove, and it is inadmissible pursuant to Rule 87(3)(c). Further, the author of this document is not presently scheduled to testify in Case 002/01. Because Mr. IENG Sary has not been afforded his absolute right under Rule 84(1) to confront the author of this article, this document is also inadmissible pursuant to Rule 87(3)(d). Should this document be admitted, the Defence submits that limited weight, if any, should be given to it unless the content of the document can be verified or supported through independent indicia. For further argument, <i>see</i> IENG Sary's Objections to the Admissibility of Certain Categories of Documents, 6 September 2011, E114, paras. 1 (Standards for the admission of documentary evidence set by the Establishment Law), 7-9 (Reliability), 11 (Relevance), 18-19 (Reports, articles and non-contemporaneous documents).
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105	Int'l Media Report	10 September 1978	International Media Report entitled "Holocaust in Cambodia" (Chicago Tribune)	E190.1.379	Details growing international protests against DK regime, as well as the regime's letter to the UN Secretary-General referring to dealing with traitors 'rigorously'.	VII. FACTUAL FINDINGS OF JOINT CRIMINAL ENTERPRISE [41:156 to 220], C. SECURITY CENTRES AND EXECUTION SITES [47:178 to 204]	The Defence recognizes that the Trial Chamber has previously found that "material such as analytical reports, books, documentary films, and media articles may be relevant and will not be excluded as a category" (E185, para. 21(5)). However, the Defence submits that media articles cannot be accepted at face value as being accurate or objective, especially when the journalists may have been engaged by governments to present a particular version of the events or even to formulate disinformation. Simply, it is virtually impossible to test the validity of media articles without, at a minimum, adducing evidence from the author. It is impossible to verify the reliability of the reporting contained herein. The article contains information and conclusions not based on direct observation of events. The document is unreliable and unsuitable to prove facts it purports to prove, and it is inadmissible pursuant to Rule 87(3)(c). Further, the author of this document is not presently scheduled to testify in Case 002/01. Because Mr. IENG Sary has not been afforded his absolute right under Rule 84(1) to confront the author of this article, this document is also inadmissible pursuant to Rule 87(3)(d). Should this document be admitted, the Defence submits that limited weight, if any, should be given to it unless the content of the document can be verified or supported through independent indicia. For further argument, <i>see</i> IENG Sary's Objections to the Admissibility of Certain Categories of Documents, 6 September 2011, E114, paras. 1 (Standards for the admission of documentary evidence set by the Establishment Law), 7-9 (Reliability), 11 (Relevance), 18-19 (Reports, articles and non-contemporaneous documents).
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106	Int'l Media Report	22 September 1978	International Media Report entitled "Ex-President of Cambodia Vows to Battle Communists" (Los Angeles Times)	E190.1.381	Describes LON Nol's visit to Washington to advocate the replacement of the DK UN representative with a Free Khmer delegation.	B. IENG SARY [250:994 to 1125], Roles and Functions [251:1001 to 1017], Deputy Prime Minister for Foreign Affairs [252:1005 to 1014]	The Defence recognizes that the Trial Chamber has previously found that "material such as analytical reports, books, documentary films, and media articles may be relevant and will not be excluded as a category" (E185, para. 21(5)). However, the Defence submits that media articles cannot be accepted at face value as being accurate or objective, especially when the journalists may have been engaged by governments to present a particular version of the events or even to formulate disinformation. Simply, it is virtually impossible to test the validity of media articles without, at a minimum, adducing evidence from the author. It is impossible to verify the reliability of the reporting contained herein. The article contains information and conclusions not based on direct observation of events. The document is unreliable and unsuitable to prove facts it purports to prove, and it is inadmissible pursuant to Rule 87(3)(c). Further, the author of this document is not presently scheduled to testify in Case 002/01. Because Mr. IENG Sary has not been afforded his absolute right under Rule 84(1) to confront the author of this article, this document is also inadmissible pursuant to Rule 87(3)(d). Should this document be admitted, the Defence submits that limited weight, if any, should be given to it unless the content of the document can be verified or supported through independent indicia. For further argument, <i>see</i> IENG Sary's Objections to the Admissibility of Certain Categories of Documents, 6 September 2011, E114, paras. 1 (Standards for the admission of documentary evidence set by the Establishment Law), 7-9 (Reliability), 11 (Relevance), 18-19 (Reports, articles and non-contemporaneous documents).
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107	Int'l Media Report	22 September 1978	International Media Report entitled "Lon Nol Pleads for Cambodia Help" (Washington Post)	E190.1.380	Describes LON Nol's requests for international assistance against DK regime during a visit to USA; article says an estimated 1 million people have died since the Khmer Rouge took over.	VII. FACTUAL FINDINGS OF JOINT CRIMINAL ENTERPRISE [41:156 to 220], C. SECURITY CENTRES AND EXECUTION SITES [47:178 to 204]	The Defence recognizes that the Trial Chamber has previously found that "material such as analytical reports, books, documentary films, and media articles may be relevant and will not be excluded as a category" (E185, para. 21(5)). However, the Defence submits that media articles cannot be accepted at face value as being accurate or objective, especially when the journalists may have been engaged by governments to present a particular version of the events or even to formulate disinformation. Simply, it is virtually impossible to test the validity of media articles without, at a minimum, adducing evidence from the author. It is impossible to verify the reliability of the reporting contained herein. The article contains information and conclusions not based on direct observation of events. The document is unreliable and unsuitable to prove facts it purports to prove, and it is inadmissible pursuant to Rule 87(3)(c). Further, the author of this document is not presently scheduled to testify in Case 002/01. Because Mr. IENG Sary has not been afforded his absolute right under Rule 84(1) to confront the author of this article, this document is also inadmissible pursuant to Rule 87(3)(d). Should this document be admitted, the Defence submits that limited weight, if any, should be given to it unless the content of the document can be verified or supported through independent indicia. For further argument, <i>see</i> IENG Sary's Objections to the Admissibility of Certain Categories of Documents, 6 September 2011, E114, paras. 1 (Standards for the admission of documentary evidence set by the Establishment Law), 7-9 (Reliability), 11 (Relevance), 18-19 (Reports, articles and non-contemporaneous documents).
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108	Int'l Media Report	01 October 1978	International Media Report entitled "Imperiled and Reviled Cambodia Seeks to Win Friends" (Washington Post)	E190.1.382	Describes attempts of DK regime, through IENG Sary alias Van, to normalise relations with other countries; UK's referral of Cambodian atrocities to UNCHR; escalating conflict between DK and Socialist Republic of Vietnam.	IV. COMMUNICATION STRUCTURE [25:72 to 112], Political and Education Material [30:99 to 112], Public Radio [32:108 to 112], VI. ARMED CONFLICT [40:150 to 155], Movement of the Population from Phnom Penh (Phase 1) [60:221 to 261], B. IENG SARY [250:994 to 1125], Roles and Functions [251:1001 to 1017], Deputy Prime Minister for Foreign Affairs [252:1005 to 1014]	The Defence recognizes that the Trial Chamber has previously found that "material such as analytical reports, books, documentary films, and media articles may be relevant and will not be excluded as a category" (E185, para. 21(5)). However, the Defence submits that media articles cannot be accepted at face value as being accurate or objective, especially when the journalists may have been engaged by governments to present a particular version of the events or even to formulate disinformation. Simply, it is virtually impossible to test the validity of media articles without, at a minimum, adducing evidence from the author. It is impossible to verify the reliability of the reporting contained herein. The article contains information and conclusions not based on direct observation of events. The document is unreliable and unsuitable to prove facts it purports to prove, and it is inadmissible pursuant to Rule 87(3)(c). Further, the author of this document is not presently scheduled to testify in Case 002/01. Because Mr. IENG Sary has not been afforded his absolute right under Rule 84(1) to confront the author of this article, this document is also inadmissible pursuant to Rule 87(3)(d). Should this document be admitted, the Defence submits that limited weight, if any, should be given to it unless the content of the document can be verified or supported through independent indicia. For further argument, <i>see</i> IENG Sary's Objections to the Admissibility of Certain Categories of Documents, 6 September 2011, E114, paras. 1 (Standards for the admission of documentary evidence set by the Establishment Law), 7-9 (Reliability), 11 (Relevance), 18-19 (Reports, articles and non-contemporaneous documents).
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109	Int'l Media Report	13 October 1978	International Media Report entitled "80 Senators Ask World Action on Cambodia Killing" (Los Angeles Times)	E190.1.384	Details a letter sent by DK Ministry of Foreign Affairs to US Senator McGovern in response to allegations of human rights violations, stating that "Kampuchea's people have smashed/into pieces all the activities of spying and subversion...".	IV. COMMUNICATION STRUCTURE [25:72 to 112], External Communication [27:85 to 86], B. IENG SARY [250:994 to 1125], Roles and Functions [251:1001 to 1017], Deputy Prime Minister for Foreign Affairs [252:1005 to 1014], Participation in the Common Purpose [255:1018 to 1121], Security Centres and Execution Sites [262:1048 to 1104], Targeting of Groups [280:1105 to 1119]	The Defence recognizes that the Trial Chamber has previously found that "material such as analytical reports, books, documentary films, and media articles may be relevant and will not be excluded as a category" (E185, para. 21(5)). However, the Defence submits that media articles cannot be accepted at face value as being accurate or objective, especially when the journalists may have been engaged by governments to present a particular version of the events or even to formulate disinformation. Simply, it is virtually impossible to test the validity of media articles without, at a minimum, adducing evidence from the author. It is impossible to verify the reliability of the reporting contained herein. The article contains information and conclusions not based on direct observation of events. The document is unreliable and unsuitable to prove facts it purports to prove, and it is inadmissible pursuant to Rule 87(3)(c). Further, the author of this document is not presently scheduled to testify in Case 002/01. Because Mr. IENG Sary has not been afforded his absolute right under Rule 84(1) to confront the author of this article, this document is also inadmissible pursuant to Rule 87(3)(d). Should this document be admitted, the Defence submits that limited weight, if any, should be given to it unless the content of the document can be verified or supported through independent indicia. For further argument, <i>see</i> IENG Sary's Objections to the Admissibility of Certain Categories of Documents, 6 September 2011, E114, paras. 1 (Standards for the admission of documentary evidence set by the Establishment Law), 7-9 (Reliability), 11 (Relevance), 18-19 (Reports, articles and non-contemporaneous documents).
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110	Int'l Media Report	13 October 1978	International Media Report entitled "Press U.N. on Cambodia, 80 Senators Urge Vance" (Washington Post)	E190.1.383	Describes a letter sent by DK leadership to U.S. Senator McGovern. Describes a DK declaration that "activities of spying and subversion" have been "Smashed".	VII. FACTUAL FINDINGS OF JOINT CRIMINAL ENTERPRISE [41:156 to 220], C. SECURITY CENTRES AND EXECUTION SITES [47:178 to 204], D. TREATMENT OF TARGETED GROUPS [55:205 to 215]	The Defence recognizes that the Trial Chamber has previously found that "material such as analytical reports, books, documentary films, and media articles may be relevant and will not be excluded as a category" (E185, para. 21(5)). However, the Defence submits that media articles cannot be accepted at face value as being accurate or objective, especially when the journalists may have been engaged by governments to present a particular version of the events or even to formulate disinformation. Simply, it is virtually impossible to test the validity of media articles without, at a minimum, adducing evidence from the author. It is impossible to verify the reliability of the reporting contained herein. The article contains information and conclusions not based on direct observation of events. The document is unreliable and unsuitable to prove facts it purports to prove, and it is inadmissible pursuant to Rule 87(3)(c). Further, the author of this document is not presently scheduled to testify in Case 002/01. Because Mr. IENG Sary has not been afforded his absolute right under Rule 84(1) to confront the author of this article, this document is also inadmissible pursuant to Rule 87(3)(d). Should this document be admitted, the Defence submits that limited weight, if any, should be given to it unless the content of the document can be verified or supported through independent indicia. For further argument, <i>see</i> IENG Sary's Objections to the Admissibility of Certain Categories of Documents, 6 September 2011, E114, paras. 1 (Standards for the admission of documentary evidence set by the Establishment Law), 7-9 (Reliability), 11 (Relevance), 18-19 (Reports, articles and non-contemporaneous documents).
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111	Int'l Media Report	15 October 1978	International Media Report entitled "Jews to Battle a 'Holocaust' in Cambodia" (Chicago Tribune)	E190.1.385	Describes a Jewish action group protesting the deaths of 2 million Cambodians.	VII. FACTUAL FINDINGS OF JOINT CRIMINAL ENTERPRISE [41:156 to 220], C. SECURITY CENTRES AND EXECUTION SITES [47:178 to 204]	The Defence recognizes that the Trial Chamber has previously found that "material such as analytical reports, books, documentary films, and media articles may be relevant and will not be excluded as a category" (E185, para. 21(5)). However, the Defence submits that media articles cannot be accepted at face value as being accurate or objective, especially when the journalists may have been engaged by governments to present a particular version of the events or even to formulate disinformation. Simply, it is virtually impossible to test the validity of media articles without, at a minimum, adducing evidence from the author. It is impossible to verify the reliability of the reporting contained herein. The article contains information and conclusions not based on direct observation of events. The document is unreliable and unsuitable to prove facts it purports to prove, and it is inadmissible pursuant to Rule 87(3)(c). Further, the author of this document is not presently scheduled to testify in Case 002/01. Because Mr. IENG Sary has not been afforded his absolute right under Rule 84(1) to confront the author of this article, this document is also inadmissible pursuant to Rule 87(3)(d). Should this document be admitted, the Defence submits that limited weight, if any, should be given to it unless the content of the document can be verified or supported through independent indicia. For further argument, <i>see</i> IENG Sary's Objections to the Admissibility of Certain Categories of Documents, 6 September 2011, E114, paras. 1 (Standards for the admission of documentary evidence set by the Establishment Law), 7-9 (Reliability), 11 (Relevance), 18-19 (Reports, articles and non-contemporaneous documents).
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112	Int'l Media Report	25 October 1978	International Media Report entitled "Cambodia Seeking to Polish its Image" (Los Angeles Times)	E190.1.386	Details IENG Sary alias Van's attempts to improve DK's image and diplomatic relations. Also describes escalating conflict with Socialist Republic of Vietnam.	VI. ARMED CONFLICT [40:150 to 155], Treatment of Vietnamese [196:791 to 841], B. IENG SARY [250:994 to 1125], Roles and Functions [251:1001 to 1017], Deputy Prime Minister for Foreign Affairs [252:1005 to 1014]	The Defence recognizes that the Trial Chamber has previously found that "material such as analytical reports, books, documentary films, and media articles may be relevant and will not be excluded as a category" (E185, para. 21(5)). However, the Defence submits that media articles cannot be accepted at face value as being accurate or objective, especially when the journalists may have been engaged by governments to present a particular version of the events or even to formulate disinformation. Simply, it is virtually impossible to test the validity of media articles without, at a minimum, adducing evidence from the author. It is impossible to verify the reliability of the reporting contained herein. The article contains information and conclusions not based on direct observation of events. The document is unreliable and unsuitable to prove facts it purports to prove, and it is inadmissible pursuant to Rule 87(3)(c). Further, the author of this document is not presently scheduled to testify in Case 002/01. Because Mr. IENG Sary has not been afforded his absolute right under Rule 84(1) to confront the author of this article, this document is also inadmissible pursuant to Rule 87(3)(d). Should this document be admitted, the Defence submits that limited weight, if any, should be given to it unless the content of the document can be verified or supported through independent indicia. For further argument, <i>see</i> IENG Sary's Objections to the Admissibility of Certain Categories of Documents, 6 September 2011, E114, paras. 1 (Standards for the admission of documentary evidence set by the Establishment Law), 7-9 (Reliability), 11 (Relevance), 18-19 (Reports, articles and non-contemporaneous documents).
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113	Int'l Media Report	18 December 1978	International Media Report entitled "Making the Unbelievable Believable" (Time Magazine)	E190.1.387	Claims that Cambodia may have endured one of cruelest slaughters since Hitler; describes the process of piecing together evidence of crimes in DK from the individual accounts of those fleeing.	VII. FACTUAL FINDINGS OF JOINT CRIMINAL ENTERPRISE [41:156 to 220], C. SECURITY CENTRES AND EXECUTION SITES [47:178 to 204]	The Defence recognizes that the Trial Chamber has previously found that "material such as analytical reports, books, documentary films, and media articles may be relevant and will not be excluded as a category" (E185, para. 21(5)). However, the Defence submits that media articles cannot be accepted at face value as being accurate or objective, especially when the journalists may have been engaged by governments to present a particular version of the events or even to formulate disinformation. Simply, it is virtually impossible to test the validity of media articles without, at a minimum, adducing evidence from the author. It is impossible to verify the reliability of the reporting contained herein. The article contains information and conclusions not based on direct observation of events. The document is unreliable and unsuitable to prove facts it purports to prove, and it is inadmissible pursuant to Rule 87(3)(c). Further, the author of this document is not presently scheduled to testify in Case 002/01. Because Mr. IENG Sary has not been afforded his absolute right under Rule 84(1) to confront the author of this article, this document is also inadmissible pursuant to Rule 87(3)(d). Should this document be admitted, the Defence submits that limited weight, if any, should be given to it unless the content of the document can be verified or supported through independent indicia. For further argument, <i>see</i> IENG Sary's Objections to the Admissibility of Certain Categories of Documents, 6 September 2011, E114, paras. 1 (Standards for the admission of documentary evidence set by the Establishment Law), 7-9 (Reliability), 11 (Relevance), 18-19 (Reports, articles and non-contemporaneous documents).
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114	Int'l Media Report	29 December 1978	International Media Report entitled "Report Purge in Cambodia" (Chicago Tribune)	E190.1.388	Describes a high-level purge conducted within DK government, and identifies IENG Sary alias Van as a senior leader of DK.	II. ADMINISTRATIVE STRUCTURES (CENTRE) [16:33 to 63], E. MINISTRIES (GOVERNMENT) OF DEMOCRATIC KAMPUCHEA [23:62 to 63], VI. ARMED CONFLICT [40:150 to 155], B. IENG SARY [250:994 to 1125], Roles and Functions [251:1001 to 1017]	The Defence recognizes that the Trial Chamber has previously found that "material such as analytical reports, books, documentary films, and media articles may be relevant and will not be excluded as a category" (E185, para. 21(5)). However, the Defence submits that media articles cannot be accepted at face value as being accurate or objective, especially when the journalists may have been engaged by governments to present a particular version of the events or even to formulate disinformation. Simply, it is virtually impossible to test the validity of media articles without, at a minimum, adducing evidence from the author. It is impossible to verify the reliability of the reporting contained herein. The article contains information and conclusions not based on direct observation of events. The document is unreliable and unsuitable to prove facts it purports to prove, and it is inadmissible pursuant to Rule 87(3)(c). Further, the author of this document is not presently scheduled to testify in Case 002/01. Because Mr. IENG Sary has not been afforded his absolute right under Rule 84(1) to confront the author of this article, this document is also inadmissible pursuant to Rule 87(3)(d). Should this document be admitted, the Defence submits that limited weight, if any, should be given to it unless the content of the document can be verified or supported through independent indicia. For further argument, <i>see</i> IENG Sary's Objections to the Admissibility of Certain Categories of Documents, 6 September 2011, E114, paras. 1 (Standards for the admission of documentary evidence set by the Establishment Law), 7-9 (Reliability), 11 (Relevance), 18-19 (Reports, articles and non-contemporaneous documents).
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115	Int'l Media Report	15 May 1986	International Media Report entitled "A Qualified Recovery" (Far Eastern Economic Review)	E190.1.389	Describes improving economic conditions in Cambodia/ after fall of DK regime. Details continuing senior roles of KHIEU Samphan alias Haem and IENG Sary alias Van throughout conflict with Socialist Republic of Vietnam.	PART FOUR: CHARACTER INFORMATION [390:1577to1612], II. IENG SARY [391:1585to1597], III. KHIEU SAMPHAN [393:1598to1604]	The Defence recognizes that the Trial Chamber has previously found that "material such as analytical reports, books, documentary films, and media articles may be relevant and will not be excluded as a category" (E185, para. 21(5)). However, the Defence submits that media articles cannot be accepted at face value as being accurate or objective, especially when the journalists may have been engaged by governments to present a particular version of the events or even to formulate disinformation. Simply, it is virtually impossible to test the validity of media articles without, at a minimum, adducing evidence from the author. It is impossible to verify the reliability of the reporting contained herein. The article contains information and conclusions not based on direct observation of events. The document is unreliable and unsuitable to prove facts it purports to prove, and it is inadmissible pursuant to Rule 87(3)(c). Further, the author of this document is not presently scheduled to testify in Case 002/01. Because Mr. IENG Sary has not been afforded his absolute right under Rule 84(1) to confront the author of this article, this document is also inadmissible pursuant to Rule 87(3)(d). Should this document be admitted, the Defence submits that limited weight, if any, should be given to it unless the content of the document can be verified or supported through independent indicia. For further argument, <i>see</i> IENG Sary's Objections to the Admissibility of Certain Categories of Documents, 6 September 2011, E114, paras. 1 (Standards for the admission of documentary evidence set by the Establishment Law), 7-9 (Reliability), 11 (Relevance), 18-19 (Reports, articles and non-contemporaneous documents).
116	Map	~ 1993	Map entitled "Tram Kak District"	E190.1.74	Displays UNTAC-era map of Tram Kak District, Takeo Province, showing communes and villages.	VII. FACTUAL FINDINGS OF JOINT CRIMINAL ENTERPRISE [41:156 to 220], B. COOPERATIVES AND WORKSITES [44:168 to 177], C. SECURITY CENTRES AND EXECUTION SITES [47:178 to 204], Tram Kok Cooperatives [79:302 to 322], Kraing Ta Chan Security Centre [125:489 to 515]	It is unclear who made this map and for what purpose it was made. Because Mr. IENG Sary has not been afforded his absolute right under Rule 84(1) to confront the author of this map, this document is also inadmissible pursuant to Rule 87(3)(d).
117	Map	> 2006	Map entitled "Siem Reap showing the North Zone Security Office"	E190.1.75	Displays layout of Siem Reap town, with area shaded in blue being the Court of First Instance, the area in red being where the North Zone Security Office stood, and the area to the west being Dharmayudhi Pagoda.	VII. FACTUAL FINDINGS OF JOINT CRIMINAL ENTERPRISE [41:156 to 220], C. SECURITY CENTRES AND EXECUTION SITES [47:178 to 204], North Zone Security Centre [146:572 to 588]	It is unclear who made this map and for what purpose it was made. Because Mr. IENG Sary has not been afforded his absolute right under Rule 84(1) to confront the author of this map, this document is also inadmissible pursuant to Rule 87(3)(d).

118	Photograph	To Be Determined	Photograph depicting NUON Chea	E190.1.76	Photograph from unknown source depicting NUON Chea in the countryside with two CPK cadres.	A. NUON CHEA [214:862 to 993], Roles and Functions [215:869 to 894]	This photograph cannot be accepted at face value as being authentic without, at a minimum, adducing evidence from the photographer. The photograph is unreliable and unsuitable to prove facts it purports to prove, and it is inadmissible pursuant to Rule 87(3)(c). Further, the photographer is not presently scheduled to testify in Case 002/01. Because Mr. IENG Sary has not been afforded his absolute right under Rule 84(1) to confront the photographer, this document is also inadmissible pursuant to Rule 87(3)(d). For further argument, <i>see</i> IENG Sary's Objections to the Admissibility of Certain Categories of Documents, 6 September 2011, E114, para. 1 (Standards for the admission of documentary evidence set by the Establishment Law), 7-9 (Reliability), 11 (Relevance), 18-19 (Reports, articles and non-contemporaneous documents).
119	Photograph	To Be Determined	Two photographs, one depicting Ieng Sary and one of Nuon Chea giving speeches at a reception	E190.1.77	Two photographs, one depicting IENG Sary alias Van giving a speech at a banquet with an unidentified guest in the background; the other depicting NUON Chea giving a speech with a translator in the background	A. NUON CHEA [214:862 to 993], Roles and Functions [215:869 to 894], B. IENG SARY [250:994 to 1125], Roles and Functions [251:1001 to 1017], Deputy Prime Minister for Foreign Affairs [252:1005 to 1014]	This photograph cannot be accepted at face value as being authentic without, at a minimum, adducing evidence from the photographer. The photograph is unreliable and unsuitable to prove facts it purports to prove, and it is inadmissible pursuant to Rule 87(3)(c). Further, the photographer is not presently scheduled to testify in Case 002/01. Because Mr. IENG Sary has not been afforded his absolute right under Rule 84(1) to confront the photographer, this document is also inadmissible pursuant to Rule 87(3)(d). For further argument, <i>see</i> IENG Sary's Objections to the Admissibility of Certain Categories of Documents, 6 September 2011, E114, para. 1 (Standards for the admission of documentary evidence set by the Establishment Law), 7-9 (Reliability), 11 (Relevance), 18-19 (Reports, articles and non-contemporaneous documents).
120	Photograph	July 1974	Photograph depicting IENG Sary, KHIEU Samphan and IENG Thirith	E190.1.78	Photograph from Lao News Agency Photo Archive via Martin Rathie depicting a flag ceremony with IENG Sary alias Van, KHIEU Samphan alias Haem and IENG Thirith alias Phea during a 1974 FUNK / GRUNK international tour.	I. HISTORICAL BACKGROUND [13:18 to 32], B. IENG SARY [250:994 to 1125], Background [250:994 to 1000], C. KHIEU SAMPHAN [284:1126 to 1200], Background [285:1126 to 1130], D. IENG THIRITH [304:1201 to 1298], Background [304:1201 to 1206]	This photograph cannot be accepted at face value as being authentic without, at a minimum, adducing evidence from the photographer. The photograph is unreliable and unsuitable to prove facts it purports to prove, and it is inadmissible pursuant to Rule 87(3)(c). Further, the photographer is not presently scheduled to testify in Case 002/01. Because Mr. IENG Sary has not been afforded his absolute right under Rule 84(1) to confront the photographer, this document is also inadmissible pursuant to Rule 87(3)(d). For further argument, <i>see</i> IENG Sary's Objections to the Admissibility of Certain Categories of Documents, 6 September 2011, E114, para. 1 (Standards for the admission of documentary evidence set by the Establishment Law), 7-9 (Reliability), 11 (Relevance), 18-19 (Reports, articles and non-contemporaneous documents).

121	Photograph	July 1974	Photograph depicting IENG Thirith, IENG Sary and TIV OI	E190.1.79 P00513367	Photograph from Lao News Agency Photo Archive via Martin Rathie depicting IENG Thirith alias Phea, IENG Sary alias Van and TIV OI alias Penh in Xang Lot, Laos, during a 1974 FUNK / GRUNK international tour.	I. HISTORICAL BACKGROUND [13:18 to 32], B. IENG SARY [250:994 to 1125], Background [250:994 to 1000], D. IENG THIRITH [304:1201 to 1298], Background [304:1201 to 1206]	This photograph cannot be accepted at face value as being authentic without, at a minimum, adducing evidence from the photographer. The photograph is unreliable and unsuitable to prove facts it purports to prove, and it is inadmissible pursuant to Rule 87(3)(c). Further, the photographer is not presently scheduled to testify in Case 002/01. Because Mr. IENG Sary has not been afforded his absolute right under Rule 84(1) to confront the photographer, this document is also inadmissible pursuant to Rule 87(3)(d). For further argument, <i>see</i> IENG Sary's Objections to the Admissibility of Certain Categories of Documents, 6 September 2011, E114, para. 1 (Standards for the admission of documentary evidence set by the Establishment Law), 7-9 (Reliability), 11 (Relevance), 18-19 (Reports, articles and non-contemporaneous documents).
122	Photograph	July 1974	Photograph depicting IENG Thirith, KHIEU Samphan and SITHON	E190.1.80 P00513617	Photograph from Lao News Agency Photo Archive via Martin Rathie depicting IENG Thirith alias Phea and KHIEU Samphan alias Haem with Laotian leader Sithon during a 1974 FUNK / GRUNK international tour.	I. HISTORICAL BACKGROUND [13:18 to 32], C. KHIEU SAMPHAN [284:1126 to 1200], Background [285:1126 to 1130], D. IENG THIRITH [304:1201 to 1298], Background [304:1201 to 1206]	This photograph cannot be accepted at face value as being authentic without, at a minimum, adducing evidence from the photographer. The photograph is unreliable and unsuitable to prove facts it purports to prove, and it is inadmissible pursuant to Rule 87(3)(c). Further, the photographer is not presently scheduled to testify in Case 002/01. Because Mr. IENG Sary has not been afforded his absolute right under Rule 84(1) to confront the photographer, this document is also inadmissible pursuant to Rule 87(3)(d). For further argument, <i>see</i> IENG Sary's Objections to the Admissibility of Certain Categories of Documents, 6 September 2011, E114, para. 1 (Standards for the admission of documentary evidence set by the Establishment Law), 7-9 (Reliability), 11 (Relevance), 18-19 (Reports, articles and non-contemporaneous documents).
123	Photograph	July 1974	Photograph depicting IENG THIRITH, SITHON, IENG Sary and KHIEU Samphan	E190.1.81 P00513368	Photograph from Lao News Agency Photo Archive via Martin Rathie depicting IENG Thirith alias Phea, IENG Sary alias Van and KHIEU Samphan alias Haem with Laotian leader Sithon during a 1974 FUNK / GRUNK international tour.	I. HISTORICAL BACKGROUND [13:18 to 32], B. IENG SARY [250:994 to 1125], Background [250:994 to 1000], C. KHIEU SAMPHAN [284:1126 to 1200], Background [285:1126 to 1130], D. IENG THIRITH [304:1201 to 1298], Background [304:1201 to 1206]	This photograph cannot be accepted at face value as being authentic without, at a minimum, adducing evidence from the photographer. The photograph is unreliable and unsuitable to prove facts it purports to prove, and it is inadmissible pursuant to Rule 87(3)(c). Further, the photographer is not presently scheduled to testify in Case 002/01. Because Mr. IENG Sary has not been afforded his absolute right under Rule 84(1) to confront the photographer, this document is also inadmissible pursuant to Rule 87(3)(d). For further argument, <i>see</i> IENG Sary's Objections to the Admissibility of Certain Categories of Documents, 6 September 2011, E114, para. 1 (Standards for the admission of documentary evidence set by the Establishment Law), 7-9 (Reliability), 11 (Relevance), 18-19 (Reports, articles and non-contemporaneous documents).

124	Photograph	July 1974	Photograph depicting Kaysone, KHIEU Samphan and IENG Sary	E190.1.83 P 00513397-00513397	Photograph from Lao News Agency Photo Archive via Martin Rathie depicting Laotian leader Kaysone speaking with KHIEU Samphan alias Haem and IENG Sary alias Van during a 1974 FUNK / GRUNK international tour.	I. HISTORICAL BACKGROUND [13:18 to 32], B. IENG SARY [250:994 to 1125], Background [250:994 to 1000], C. KHIEU SAMPHAN [284:1126 to 1200], Background [285:1126 to 1130]	This photograph cannot be accepted at face value as being authentic without, at a minimum, adducing evidence from the photographer. The photograph is unreliable and unsuitable to prove facts it purports to prove, and it is inadmissible pursuant to Rule 87(3)(c). Further, the photographer is not presently scheduled to testify in Case 002/01. Because Mr. IENG Sary has not been afforded his absolute right under Rule 84(1) to confront the photographer, this document is also inadmissible pursuant to Rule 87(3)(d). For further argument, <i>see</i> IENG Sary's Objections to the Admissibility of Certain Categories of Documents, 6 September 2011, E114, para. 1 (Standards for the admission of documentary evidence set by the Establishment Law), 7-9 (Reliability), 11 (Relevance), 18-19 (Reports, articles and non-contemporaneous documents).
125	Photograph	July 1974	Photograph depicting Kaysone, KHIEU Samphan and IENG Sary	E190.1.84 P 00513392-00513392	Photograph from Lao News Agency Photo Archive via Martin Rathie depicting Kaysone explaining a gift to KHIEU Samphan alias Haem and IENG Sary alias Van during a 1974 FUNK / GRUNK international tour.	I. HISTORICAL BACKGROUND [13:18 to 32], B. IENG SARY [250:994 to 1125], Background [250:994 to 1000], C. KHIEU SAMPHAN [284:1126 to 1200], Background [285:1126 to 1130]	This photograph cannot be accepted at face value as being authentic without, at a minimum, adducing evidence from the photographer. The photograph is unreliable and unsuitable to prove facts it purports to prove, and it is inadmissible pursuant to Rule 87(3)(c). Further, the photographer is not presently scheduled to testify in Case 002/01. Because Mr. IENG Sary has not been afforded his absolute right under Rule 84(1) to confront the photographer, this document is also inadmissible pursuant to Rule 87(3)(d). For further argument, <i>see</i> IENG Sary's Objections to the Admissibility of Certain Categories of Documents, 6 September 2011, E114, para. 1 (Standards for the admission of documentary evidence set by the Establishment Law), 7-9 (Reliability), 11 (Relevance), 18-19 (Reports, articles and non-contemporaneous documents).
126	Photograph	July 1974	Photograph depicting Kaysone, KHIEU Samphan and IENG Sary	E190.1.82 P 00513395-00513395	Photograph from Lao News Agency Photo Archive via Martin Rathie depicting Laotian leader Kaysone speaking, with glass in hand, to KHIEU Samphan alias Haem and IENG Sary alias Van during a 1974 FUNK / GRUNK international tour.	I. HISTORICAL BACKGROUND [13:18 to 32], B. IENG SARY [250:994 to 1125], Background [250:994 to 1000], C. KHIEU SAMPHAN [284:1126 to 1200], Background [285:1126 to 1130]	This photograph cannot be accepted at face value as being authentic without, at a minimum, adducing evidence from the photographer. The photograph is unreliable and unsuitable to prove facts it purports to prove, and it is inadmissible pursuant to Rule 87(3)(c). Further, the photographer is not presently scheduled to testify in Case 002/01. Because Mr. IENG Sary has not been afforded his absolute right under Rule 84(1) to confront the photographer, this document is also inadmissible pursuant to Rule 87(3)(d). For further argument, <i>see</i> IENG Sary's Objections to the Admissibility of Certain Categories of Documents, 6 September 2011, E114, para. 1 (Standards for the admission of documentary evidence set by the Establishment Law), 7-9 (Reliability), 11 (Relevance), 18-19 (Reports, articles and non-contemporaneous documents).

127	Photograph	July 1974	Photograph depicting Khamtai, KHIEU Samphan and IENG Sary	E190.1.85 P 00513410-00513410	Photograph from Lao News Agency Photo Archive via Martin Rathie depicting Laotian leader Khamtai with KHIEU Samphan alias Haem and IENG Sary alias Van during a 1974 FUNK / GRUNK international tour.	I. HISTORICAL BACKGROUND [13:18 to 32], B. IENG SARY [250:994 to 1125], Background [250:994 to 1000], C. KHIEU SAMPHAN [284:1126 to 1200], Background [285:1126 to 1130]	This photograph cannot be accepted at face value as being authentic without, at a minimum, adducing evidence from the photographer. The photograph is unreliable and unsuitable to prove facts it purports to prove, and it is inadmissible pursuant to Rule 87(3)(c). Further, the photographer is not presently scheduled to testify in Case 002/01. Because Mr. IENG Sary has not been afforded his absolute right under Rule 84(1) to confront the photographer, this document is also inadmissible pursuant to Rule 87(3)(d). For further argument, <i>see</i> IENG Sary's Objections to the Admissibility of Certain Categories of Documents, 6 September 2011, E114, para. 1 (Standards for the admission of documentary evidence set by the Establishment Law), 7-9 (Reliability), 11 (Relevance), 18-19 (Reports, articles and non-contemporaneous documents).
128	Photograph	July 1974	Photograph depicting KHIEU Samphan	E190.1.86 P 00513340-00513340	Photograph depicting KHIEU Samphan alias Haem in a jeep during a 1974 FUNK / GRUNK international tour.	I. HISTORICAL BACKGROUND [13:18 to 32], Background [285:1126 to 1130]	This photograph cannot be accepted at face value as being authentic without, at a minimum, adducing evidence from the photographer. The photograph is unreliable and unsuitable to prove facts it purports to prove, and it is inadmissible pursuant to Rule 87(3)(c). Further, the photographer is not presently scheduled to testify in Case 002/01. Because Mr. IENG Sary has not been afforded his absolute right under Rule 84(1) to confront the photographer, this document is also inadmissible pursuant to Rule 87(3)(d). For further argument, <i>see</i> IENG Sary's Objections to the Admissibility of Certain Categories of Documents, 6 September 2011, E114, para. 1 (Standards for the admission of documentary evidence set by the Establishment Law), 7-9 (Reliability), 11 (Relevance), 18-19 (Reports, articles and non-contemporaneous documents).
129	Photograph	July 1974	Photograph depicting KHIEU Samphan	E190.1.87 P 00513427-00513427	Photograph from Lao News Agency Photo Archive via Martin Rathie depicting KHIEU Samphan alias Haem at cave banquet during a 1974 FUNK / GRUNK international tour.	I. HISTORICAL BACKGROUND [13:18 to 32], C. KHIEU SAMPHAN [284:1126 to 1200], Background [285:1126 to 1130]	This photograph cannot be accepted at face value as being authentic without, at a minimum, adducing evidence from the photographer. The photograph is unreliable and unsuitable to prove facts it purports to prove, and it is inadmissible pursuant to Rule 87(3)(c). Further, the photographer is not presently scheduled to testify in Case 002/01. Because Mr. IENG Sary has not been afforded his absolute right under Rule 84(1) to confront the photographer, this document is also inadmissible pursuant to Rule 87(3)(d). For further argument, <i>see</i> IENG Sary's Objections to the Admissibility of Certain Categories of Documents, 6 September 2011, E114, para. 1 (Standards for the admission of documentary evidence set by the Establishment Law), 7-9 (Reliability), 11 (Relevance), 18-19 (Reports, articles and non-contemporaneous documents).

130	Photograph	July 1974	Photograph depicting KHIEU Samphan and IENG Sary	E190.1.89 P 00513585- 00513585	Photograph from Lao News Agency Photo Archive via Martin Rathie depicting soldiers saluting flags with KHIEU Samphan alias Haem and IENG Sary alias Van during a 1974 FUNK / GRUNK international tour.	I. HISTORICAL BACKGROUND [13:18 to 32], B. IENG SARY [250:994 to 1125], Background [250:994 to 1000], C. KHIEU SAMPHAN [284:1126 to 1200], Background [285:1126 to 1130]	This photograph cannot be accepted at face value as being authentic without, at a minimum, adducing evidence from the photographer. The photograph is unreliable and unsuitable to prove facts it purports to prove, and it is inadmissible pursuant to Rule 87(3)(c). Further, the photographer is not presently scheduled to testify in Case 002/01. Because Mr. IENG Sary has not been afforded his absolute right under Rule 84(1) to confront the photographer, this document is also inadmissible pursuant to Rule 87(3)(d). For further argument, <i>see</i> IENG Sary's Objections to the Admissibility of Certain Categories of Documents, 6 September 2011, E114, para. 1 (Standards for the admission of documentary evidence set by the Establishment Law), 7-9 (Reliability), 11 (Relevance), 18-19 (Reports, articles and non-contemporaneous documents).
131	Photograph	July 1974	Photograph depicting KHIEU Samphan and IENG Sary	E190.1.88 P 00513430- 00513430	Photograph from Lao News Agency Photo Archive via Martin Rathie depicting KHIEU Samphan alias Haem and IENG Sary alias Van congratulating Lao performers during a 1974 FUNK / GRUNK international tour.	I. HISTORICAL BACKGROUND [13:18 to 32], B. IENG SARY [250:994 to 1125], Background [250:994 to 1000], C. KHIEU SAMPHAN [284:1126 to 1200], Background [285:1126 to 1130]	This photograph cannot be accepted at face value as being authentic without, at a minimum, adducing evidence from the photographer. The photograph is unreliable and unsuitable to prove facts it purports to prove, and it is inadmissible pursuant to Rule 87(3)(c). Further, the photographer is not presently scheduled to testify in Case 002/01. Because Mr. IENG Sary has not been afforded his absolute right under Rule 84(1) to confront the photographer, this document is also inadmissible pursuant to Rule 87(3)(d). For further argument, <i>see</i> IENG Sary's Objections to the Admissibility of Certain Categories of Documents, 6 September 2011, E114, para. 1 (Standards for the admission of documentary evidence set by the Establishment Law), 7-9 (Reliability), 11 (Relevance), 18-19 (Reports, articles and non-contemporaneous documents).
132	Photograph	July 1974	Photograph depicting KHIEU Samphan and IENG Sary	E190.1.90 P 00513414- 00513414	Photograph from Lao News Agency Photo Archive via Martin Rathie depicting KHIEU Samphan alias Haem and IENG Sary alias Van meeting locals during a 1974 FUNK / GRUNK international tour.	I. HISTORICAL BACKGROUND [13:18 to 32], B. IENG SARY [250:994 to 1125], Background [250:994 to 1000], C. KHIEU SAMPHAN [284:1126 to 1200], Background [285:1126 to 1130]	This photograph cannot be accepted at face value as being authentic without, at a minimum, adducing evidence from the photographer. The photograph is unreliable and unsuitable to prove facts it purports to prove, and it is inadmissible pursuant to Rule 87(3)(c). Further, the photographer is not presently scheduled to testify in Case 002/01. Because Mr. IENG Sary has not been afforded his absolute right under Rule 84(1) to confront the photographer, this document is also inadmissible pursuant to Rule 87(3)(d). For further argument, <i>see</i> IENG Sary's Objections to the Admissibility of Certain Categories of Documents, 6 September 2011, E114, para. 1 (Standards for the admission of documentary evidence set by the Establishment Law), 7-9 (Reliability), 11 (Relevance), 18-19 (Reports, articles and non-contemporaneous documents).

133	Photograph	July 1974	Photograph depicting KHIEU Samphan and Sisavath	E190.1.91 P 00513423- 00513423	Photograph from Lao News Agency Photo Archive via Martin Rathie depicting KHIEU Samphan alias Haem and Laotian leader Sisavath passing locals in a jeep during a 1974 FUNK / GRUNK international tour.	I. HISTORICAL BACKGROUND [13:18 to 32], C. KHIEU SAMPHAN [284:1126 to 1200], Background [285:1126 to 1130]	This photograph cannot be accepted at face value as being authentic without, at a minimum, adducing evidence from the photographer. The photograph is unreliable and unsuitable to prove facts it purports to prove, and it is inadmissible pursuant to Rule 87(3)(c). Further, the photographer is not presently scheduled to testify in Case 002/01. Because Mr. IENG Sary has not been afforded his absolute right under Rule 84(1) to confront the photographer, this document is also inadmissible pursuant to Rule 87(3)(d). For further argument, <i>see</i> IENG Sary's Objections to the Admissibility of Certain Categories of Documents, 6 September 2011, E114, para. 1 (Standards for the admission of documentary evidence set by the Establishment Law), 7-9 (Reliability), 11 (Relevance), 18-19 (Reports, articles and non-contemporaneous documents).
134	Photograph	July 1974	Photograph depicting KHIEU Samphan, IENG Sary and IENG Thirith	E190.1.95 P 00513416- 00513416	Photograph from Lao News Agency Photo Archive via Martin Rathie depicting KHIEU Samphan alias Haem, IENG Sary alias Van and IENG Thirith alias Phea walking past locals during a 1974 FUNK / GRUNK international tour.	I. HISTORICAL BACKGROUND [13:18 to 32], B. IENG SARY [250:994 to 1125], Background [250:994 to 1000], C. KHIEU SAMPHAN [284:1126 to 1200], Background [285:1126 to 1130], D. IENG THIRITH [304:1201 to 1298], Background [304:1201 to 1206]	This photograph cannot be accepted at face value as being authentic without, at a minimum, adducing evidence from the photographer. The photograph is unreliable and unsuitable to prove facts it purports to prove, and it is inadmissible pursuant to Rule 87(3)(c). Further, the photographer is not presently scheduled to testify in Case 002/01. Because Mr. IENG Sary has not been afforded his absolute right under Rule 84(1) to confront the photographer, this document is also inadmissible pursuant to Rule 87(3)(d). For further argument, <i>see</i> IENG Sary's Objections to the Admissibility of Certain Categories of Documents, 6 September 2011, E114, para. 1 (Standards for the admission of documentary evidence set by the Establishment Law), 7-9 (Reliability), 11 (Relevance), 18-19 (Reports, articles and non-contemporaneous documents).
135	Photograph	July 1974	Photograph depicting KHIEU Samphan, IENG Sary and IENG Thirith	E190.1.94 P 00513517- 00513517	Photograph from Lao News Agency Photo Archive via Martin Rathie depicting KHIEU Samphan alias Haem, IENG Sary alias Van and IENG Thirith alias Phea in official talks with Laotian leaders during a 1974 FUNK / GRUNK international tour.	I. HISTORICAL BACKGROUND [13:18 to 32], B. IENG SARY [250:994 to 1125], Background [250:994 to 1000], C. KHIEU SAMPHAN [284:1126 to 1200], Background [285:1126 to 1130], D. IENG THIRITH [304:1201 to 1298], Background [304:1201 to 1206]	This photograph cannot be accepted at face value as being authentic without, at a minimum, adducing evidence from the photographer. The photograph is unreliable and unsuitable to prove facts it purports to prove, and it is inadmissible pursuant to Rule 87(3)(c). Further, the photographer is not presently scheduled to testify in Case 002/01. Because Mr. IENG Sary has not been afforded his absolute right under Rule 84(1) to confront the photographer, this document is also inadmissible pursuant to Rule 87(3)(d). For further argument, <i>see</i> IENG Sary's Objections to the Admissibility of Certain Categories of Documents, 6 September 2011, E114, para. 1 (Standards for the admission of documentary evidence set by the Establishment Law), 7-9 (Reliability), 11 (Relevance), 18-19 (Reports, articles and non-contemporaneous documents).

136	Photograph	July 1974	Photograph depicting KHIEU Samphan, IENG Sary and IENG Thirith	E190.1.93 P 00513515- 00513515	Photograph from Lao News Agency Photo Archive via Martin Rathie depicting the Pathet Lao pennant to KHIEU Samphan alias Haem, IENG Sary alias Van and IENG Thirith alias Phea during a 1974 FUNK / GRUNK international tour.	I. HISTORICAL BACKGROUND [13:18 to 32], B. IENG SARY [250:994 to 1125], Background [250:994 to 1000], C. KHIEU SAMPHAN [284:1126 to 1200], Background [285:1126 to 1130], D. IENG THIRITH [304:1201 to 1298], Background [304:1201 to 1206]	This photograph cannot be accepted at face value as being authentic without, at a minimum, adducing evidence from the photographer. The photograph is unreliable and unsuitable to prove facts it purports to prove, and it is inadmissible pursuant to Rule 87(3)(c). Further, the photographer is not presently scheduled to testify in Case 002/01. Because Mr. IENG Sary has not been afforded his absolute right under Rule 84(1) to confront the photographer, this document is also inadmissible pursuant to Rule 87(3)(d). For further argument, <i>see</i> IENG Sary's Objections to the Admissibility of Certain Categories of Documents, 6 September 2011, E114, para. 1 (Standards for the admission of documentary evidence set by the Establishment Law), 7-9 (Reliability), 11 (Relevance), 18-19 (Reports, articles and non-contemporaneous documents).
137	Photograph	July 1974	Photograph depicting KHIEU Samphan, IENG Sary and IENG Thirith	E190.1.92 P 00513354- 00513354	Photograph from Lao News Agency Photo Archive via Martin Rathie depicting a gift of flowers for KHIEU Samphan alias Haem while IENG Sary alias Van and IENG Thirith alias Phea watch during a 1974 FUNK / GRUNK international tour.	I. HISTORICAL BACKGROUND [13:18 to 32], B. IENG SARY [250:994 to 1125], Background [250:994 to 1000], C. KHIEU SAMPHAN [284:1126 to 1200], Background [285:1126 to 1130], D. IENG THIRITH [304:1201 to 1298], Background [304:1201 to 1206]	This photograph cannot be accepted at face value as being authentic without, at a minimum, adducing evidence from the photographer. The photograph is unreliable and unsuitable to prove facts it purports to prove, and it is inadmissible pursuant to Rule 87(3)(c). Further, the photographer is not presently scheduled to testify in Case 002/01. Because Mr. IENG Sary has not been afforded his absolute right under Rule 84(1) to confront the photographer, this document is also inadmissible pursuant to Rule 87(3)(d). For further argument, <i>see</i> IENG Sary's Objections to the Admissibility of Certain Categories of Documents, 6 September 2011, E114, para. 1 (Standards for the admission of documentary evidence set by the Establishment Law), 7-9 (Reliability), 11 (Relevance), 18-19 (Reports, articles and non-contemporaneous documents).
138	Photograph	July 1974	Photograph depicting KHIEU Samphan, IENG Sary and MAISOUK	E190.1.96 P 00513438- 00513438	Photograph from Lao News Agency Photo Archive via Martin Rathie depicting KHIEU Samphan alias Haem and IENG Sary alias Van with Laotian leader Maisouk during a 1974 FUNK / GRUNK international tour.	I. HISTORICAL BACKGROUND [13:18 to 32], B. IENG SARY [250:994 to 1125], Background [250:994 to 1000], C. KHIEU SAMPHAN [284:1126 to 1200], Background [285:1126 to 1130]	This photograph cannot be accepted at face value as being authentic without, at a minimum, adducing evidence from the photographer. The photograph is unreliable and unsuitable to prove facts it purports to prove, and it is inadmissible pursuant to Rule 87(3)(c). Further, the photographer is not presently scheduled to testify in Case 002/01. Because Mr. IENG Sary has not been afforded his absolute right under Rule 84(1) to confront the photographer, this document is also inadmissible pursuant to Rule 87(3)(d). For further argument, <i>see</i> IENG Sary's Objections to the Admissibility of Certain Categories of Documents, 6 September 2011, E114, para. 1 (Standards for the admission of documentary evidence set by the Establishment Law), 7-9 (Reliability), 11 (Relevance), 18-19 (Reports, articles and non-contemporaneous documents).

139	Photograph	July 1974	Photograph depicting KHIEU Samphan, IENG Sary and TIV Ol	E190.1.97 P 00513628-00513628	Photograph from Lao News Agency Photo Archive via Martin Rathie depicting KHIEU Samphan alias Haem, IENG Sary alias Van and TIV Ol alias Penh leaving a meeting during a 1974 FUNK / GRUNK international tour.	I. HISTORICAL BACKGROUND [13:18 to 32], B. IENG SARY [250:994 to 1125], Background [250:994 to 1000], C. KHIEU SAMPHAN [284:1126 to 1200], Background [285:1126 to 1130]	This photograph cannot be accepted at face value as being authentic without, at a minimum, adducing evidence from the photographer. The photograph is unreliable and unsuitable to prove facts it purports to prove, and it is inadmissible pursuant to Rule 87(3)(c). Further, the photographer is not presently scheduled to testify in Case 002/01. Because Mr. IENG Sary has not been afforded his absolute right under Rule 84(1) to confront the photographer, this document is also inadmissible pursuant to Rule 87(3)(d). For further argument, <i>see</i> IENG Sary's Objections to the Admissibility of Certain Categories of Documents, 6 September 2011, E114, para. 1 (Standards for the admission of documentary evidence set by the Establishment Law), 7-9 (Reliability), 11 (Relevance), 18-19 (Reports, articles and non-contemporaneous documents).
140	Photograph	July 1974	Photograph depicting KHIEU Samphan, IENG Sary, IENG Thirith and Sithon	E190.1.98 P 00513356-00513356	Photograph from Lao News Agency Photo Archive via Martin Rathie depicting KHIEU Samphan alias Haem, IENG Sary alias Van and IENG Thirith alias Phea with a gift for Lao leader Sithon during a 1974 FUNK / GRUNK international tour.	I. HISTORICAL BACKGROUND [13:18 to 32], B. IENG SARY [250:994 to 1125], Background [250:994 to 1000], C. KHIEU SAMPHAN [284:1126 to 1200], Background [285:1126 to 1130], D. IENG THIRITH [304:1201 to 1298], Background [304:1201 to 1206]	This photograph cannot be accepted at face value as being authentic without, at a minimum, adducing evidence from the photographer. The photograph is unreliable and unsuitable to prove facts it purports to prove, and it is inadmissible pursuant to Rule 87(3)(c). Further, the photographer is not presently scheduled to testify in Case 002/01. Because Mr. IENG Sary has not been afforded his absolute right under Rule 84(1) to confront the photographer, this document is also inadmissible pursuant to Rule 87(3)(d). For further argument, <i>see</i> IENG Sary's Objections to the Admissibility of Certain Categories of Documents, 6 September 2011, E114, para. 1 (Standards for the admission of documentary evidence set by the Establishment Law), 7-9 (Reliability), 11 (Relevance), 18-19 (Reports, articles and non-contemporaneous documents).
141	Photograph	July 1974	Photograph depicting KHIEU Samphan, IENG Sary, IENG Thirith, TIV Ol and SIEN An	E190.1.99 P 00513518-00513518	Photograph from Lao News Agency Photo Archive via Martin Rathie depicting KHIEU Samphan alias Haem, IENG Sary alias Van, IENG Thirith alias Phea, TIV Ol alias Penh and SIEN An during a 1974 FUNK / GRUNK international tour.	I. HISTORICAL BACKGROUND [13:18 to 32], C. KHIEU SAMPHAN [284:1126 to 1200], Background [285:1126 to 1130], D. IENG THIRITH [304:1201 to 1298], Background [304:1201 to 1206]	This photograph cannot be accepted at face value as being authentic without, at a minimum, adducing evidence from the photographer. The photograph is unreliable and unsuitable to prove facts it purports to prove, and it is inadmissible pursuant to Rule 87(3)(c). Further, the photographer is not presently scheduled to testify in Case 002/01. Because Mr. IENG Sary has not been afforded his absolute right under Rule 84(1) to confront the photographer, this document is also inadmissible pursuant to Rule 87(3)(d). For further argument, <i>see</i> IENG Sary's Objections to the Admissibility of Certain Categories of Documents, 6 September 2011, E114, para. 1 (Standards for the admission of documentary evidence set by the Establishment Law), 7-9 (Reliability), 11 (Relevance), 18-19 (Reports, articles and non-contemporaneous documents).

142	Photograph	July 1974	Photograph depicting KHIEU Samphan, IENG Thirith and TIV Ol	E190.1.102 P 00513512-00513512	Photograph from Lao News Agency Photo Archive via Martin Rathie depicting KHIEU Samphan alias Haem, IENG Thirith alias Phea and TIV Ol alias Penh inspecting a Pathet Lao anti-aircraft gun during a 1974 FUNK / GRUNK international tour.	I. HISTORICAL BACKGROUND [13:18 to 32], C. KHIEU SAMPHAN [284:1126 to 1200], Background [285:1126 to 1130], D. IENG THIRITH [304:1201 to 1298], Background [304:1201 to 1206]	This photograph cannot be accepted at face value as being authentic without, at a minimum, adducing evidence from the photographer. The photograph is unreliable and unsuitable to prove facts it purports to prove, and it is inadmissible pursuant to Rule 87(3)(c). Further, the photographer is not presently scheduled to testify in Case 002/01. Because Mr. IENG Sary has not been afforded his absolute right under Rule 84(1) to confront the photographer, this document is also inadmissible pursuant to Rule 87(3)(d). For further argument, <i>see</i> IENG Sary's Objections to the Admissibility of Certain Categories of Documents, 6 September 2011, E114, para. 1 (Standards for the admission of documentary evidence set by the Establishment Law), 7-9 (Reliability), 11 (Relevance), 18-19 (Reports, articles and non-contemporaneous documents).
143	Photograph	July 1974	Photograph depicting KHIEU Samphan, IENG Thirith and TIV Ol	E190.1.100 P 00513413-00513413	Photograph from Lao News Agency Photo Archive via Martin Rathie depicting KHIEU Samphan alias Haem, IENG Thirith alias Phea and TIV Ol alias Penh inspecting an anti-aircraft unit in Laos during a 1974 FUNK / GRUNK international tour.	I. HISTORICAL BACKGROUND [13:18 to 32], C. KHIEU SAMPHAN [284:1126 to 1200], Background [285:1126 to 1130], D. IENG THIRITH [304:1201 to 1298], Background [304:1201 to 1206]	This photograph cannot be accepted at face value as being authentic without, at a minimum, adducing evidence from the photographer. The photograph is unreliable and unsuitable to prove facts it purports to prove, and it is inadmissible pursuant to Rule 87(3)(c). Further, the photographer is not presently scheduled to testify in Case 002/01. Because Mr. IENG Sary has not been afforded his absolute right under Rule 84(1) to confront the photographer, this document is also inadmissible pursuant to Rule 87(3)(d). For further argument, <i>see</i> IENG Sary's Objections to the Admissibility of Certain Categories of Documents, 6 September 2011, E114, para. 1 (Standards for the admission of documentary evidence set by the Establishment Law), 7-9 (Reliability), 11 (Relevance), 18-19 (Reports, articles and non-contemporaneous documents).
144	Photograph	July 1974	Photograph depicting KHIEU Samphan, IENG Thirith and TIV Ol	E190.1.101 P 00513442-00513442	Photograph from Lao News Agency Photo Archive via Martin Rathie depicting KHIEU Samphan alias Haem, IENG Thirith alias Phea and TIV Ol clapping outdoors during a 1974 FUNK / GRUNK international tour.	I. HISTORICAL BACKGROUND [13:18 to 32], C. KHIEU SAMPHAN [284:1126 to 1200], Background [285:1126 to 1130], D. IENG THIRITH [304:1201 to 1298], Background [304:1201 to 1206]	This photograph cannot be accepted at face value as being authentic without, at a minimum, adducing evidence from the photographer. The photograph is unreliable and unsuitable to prove facts it purports to prove, and it is inadmissible pursuant to Rule 87(3)(c). Further, the photographer is not presently scheduled to testify in Case 002/01. Because Mr. IENG Sary has not been afforded his absolute right under Rule 84(1) to confront the photographer, this document is also inadmissible pursuant to Rule 87(3)(d). For further argument, <i>see</i> IENG Sary's Objections to the Admissibility of Certain Categories of Documents, 6 September 2011, E114, para. 1 (Standards for the admission of documentary evidence set by the Establishment Law), 7-9 (Reliability), 11 (Relevance), 18-19 (Reports, articles and non-contemporaneous documents).

145	Photograph	July 1974	Photograph depicting KHIEU Samphan, Khamtai and IENG Sary	E190.1.103 P 00513434- 00513434	Photograph from Lao News Agency Photo Archive via Martin Rathie depicting IENG Sary alias Van with KHIEU Samphan alias Haem, preparing, next to Laotian leader Khamtai during a 1974 FUNK / GRUNK international tour.	I. HISTORICAL BACKGROUND [13:18 to 32], B. IENG SARY [250:994 to 1125], Background [250:994 to 1000], C. KHIEU SAMPHAN [284:1126 to 1200], Background [285:1126 to 1130]	This photograph cannot be accepted at face value as being authentic without, at a minimum, adducing evidence from the photographer. The photograph is unreliable and unsuitable to prove facts it purports to prove, and it is inadmissible pursuant to Rule 87(3)(c). Further, the photographer is not presently scheduled to testify in Case 002/01. Because Mr. IENG Sary has not been afforded his absolute right under Rule 84(1) to confront the photographer, this document is also inadmissible pursuant to Rule 87(3)(d). For further argument, <i>see</i> IENG Sary's Objections to the Admissibility of Certain Categories of Documents, 6 September 2011, E114, para. 1 (Standards for the admission of documentary evidence set by the Establishment Law), 7-9 (Reliability), 11 (Relevance), 18-19 (Reports, articles and non-contemporaneous documents).
146	Photograph	July 1974	Photograph depicting NOUHAK, SITHON, KHIEU Samphan and IENG Sary	E190.1.104 P 00513495- 00513495	Photograph from Lao News Agency Photo Archive via Martin Rathie depicting KHIEU Samphan alias Haem and IENG Sary alias Van with Laotian leaders Nouhak and Sithon during a 1974 FUNK / GRUNK international tour.	I. HISTORICAL BACKGROUND [13:18 to 32], B. IENG SARY [250:994 to 1125], Background [250:994 to 1000], C. KHIEU SAMPHAN [284:1126 to 1200], Background [285:1126 to 1130]	This photograph cannot be accepted at face value as being authentic without, at a minimum, adducing evidence from the photographer. The photograph is unreliable and unsuitable to prove facts it purports to prove, and it is inadmissible pursuant to Rule 87(3)(c). Further, the photographer is not presently scheduled to testify in Case 002/01. Because Mr. IENG Sary has not been afforded his absolute right under Rule 84(1) to confront the photographer, this document is also inadmissible pursuant to Rule 87(3)(d). For further argument, <i>see</i> IENG Sary's Objections to the Admissibility of Certain Categories of Documents, 6 September 2011, E114, para. 1 (Standards for the admission of documentary evidence set by the Establishment Law), 7-9 (Reliability), 11 (Relevance), 18-19 (Reports, articles and non-contemporaneous documents).
147	Photograph	July 1974	Photograph depicting Sisavath and KHIEU Samphan	E190.1.106 P 00513373- 00513373	Photograph from Lao News Agency Photo Archive via Martin Rathie depicting jeep bringing Laotian leader Sisavath and KHIEU Samphan alias Haem during a 1974 FUNK / GRUNK international tour.	I. HISTORICAL BACKGROUND [13:18 to 32], C. KHIEU SAMPHAN [284:1126 to 1200], Background [285:1126 to 1130]	This photograph cannot be accepted at face value as being authentic without, at a minimum, adducing evidence from the photographer. The photograph is unreliable and unsuitable to prove facts it purports to prove, and it is inadmissible pursuant to Rule 87(3)(c). Further, the photographer is not presently scheduled to testify in Case 002/01. Because Mr. IENG Sary has not been afforded his absolute right under Rule 84(1) to confront the photographer, this document is also inadmissible pursuant to Rule 87(3)(d). For further argument, <i>see</i> IENG Sary's Objections to the Admissibility of Certain Categories of Documents, 6 September 2011, E114, para. 1 (Standards for the admission of documentary evidence set by the Establishment Law), 7-9 (Reliability), 11 (Relevance), 18-19 (Reports, articles and non-contemporaneous documents).

148	Photograph	July 1974	Photograph depicting Sisavath and KHIEU Samphan	E190.1.105 P 00513573-00513573	Photograph from Lao News Agency Photo Archive via Martin Rathie depicting Laotian leader Sisavath talking with KHIEU Samphan alias Haem during a 1974 FUNK / GRUNK international tour.	I. HISTORICAL BACKGROUND [13:18 to 32], C. KHIEU SAMPHAN [284:1126 to 1200], Background [285:1126 to 1130]	This photograph cannot be accepted at face value as being authentic without, at a minimum, adducing evidence from the photographer. The photograph is unreliable and unsuitable to prove facts it purports to prove, and it is inadmissible pursuant to Rule 87(3)(c). Further, the photographer is not presently scheduled to testify in Case 002/01. Because Mr. IENG Sary has not been afforded his absolute right under Rule 84(1) to confront the photographer, this document is also inadmissible pursuant to Rule 87(3)(d). For further argument, <i>see</i> IENG Sary's Objections to the Admissibility of Certain Categories of Documents, 6 September 2011, E114, para. 1 (Standards for the admission of documentary evidence set by the Establishment Law), 7-9 (Reliability), 11 (Relevance), 18-19 (Reports, articles and non-contemporaneous documents).
149	Photograph	July 1974	Photograph depicting Sisavath and KHIEU Samphan	E190.1.107 P 00513570-00513570	Photograph from Lao News Agency Photo Archive via Martin Rathie depicting Laotian leader Sisavath and KHIEU Samphan alias Haem in jeep during a 1974 FUNK / GRUNK international tour.	I. HISTORICAL BACKGROUND [13:18 to 32], C. KHIEU SAMPHAN [284:1126 to 1200], Background [285:1126 to 1130]	This photograph cannot be accepted at face value as being authentic without, at a minimum, adducing evidence from the photographer. The photograph is unreliable and unsuitable to prove facts it purports to prove, and it is inadmissible pursuant to Rule 87(3)(c). Further, the photographer is not presently scheduled to testify in Case 002/01. Because Mr. IENG Sary has not been afforded his absolute right under Rule 84(1) to confront the photographer, this document is also inadmissible pursuant to Rule 87(3)(d). For further argument, <i>see</i> IENG Sary's Objections to the Admissibility of Certain Categories of Documents, 6 September 2011, E114, para. 1 (Standards for the admission of documentary evidence set by the Establishment Law), 7-9 (Reliability), 11 (Relevance), 18-19 (Reports, articles and non-contemporaneous documents).
150	Photograph	July 1974	Photograph depicting SITHON, KHIEU Samphan and IENG Sary	E190.1.108 P 00513577-00513577	Photograph from Lao News Agency Photo Archive via Martin Rathie depicting Lao leaders Sithon and Nouhak leading KHIEU Samphan alias Haem and IENG Sary alias Van past locals during 1974 FUNK / GRUNK international tour.	I. HISTORICAL BACKGROUND [13:18 to 32], B. IENG SARY [250:994 to 1125], Background [250:994 to 1000], C. KHIEU SAMPHAN [284:1126 to 1200], Background [285:1126 to 1130]	This photograph cannot be accepted at face value as being authentic without, at a minimum, adducing evidence from the photographer. The photograph is unreliable and unsuitable to prove facts it purports to prove, and it is inadmissible pursuant to Rule 87(3)(c). Further, the photographer is not presently scheduled to testify in Case 002/01. Because Mr. IENG Sary has not been afforded his absolute right under Rule 84(1) to confront the photographer, this document is also inadmissible pursuant to Rule 87(3)(d). For further argument, <i>see</i> IENG Sary's Objections to the Admissibility of Certain Categories of Documents, 6 September 2011, E114, para. 1 (Standards for the admission of documentary evidence set by the Establishment Law), 7-9 (Reliability), 11 (Relevance), 18-19 (Reports, articles and non-contemporaneous documents).

151	Photograph	July 1974	Photograph depicting SITHON, NOUHAK, IENG Sary and KHIEU Samphan	E190.1.110 P 00513581-00513581	Photograph from Lao News Agency Photo Archive via Martin Rathie depicting IENG Sary alias Van and KHIEU Samphan alias Haem with Laotian leaders Sithon and Nouhak at attention during a 1974 FUNK / GRUNK international tour.	I. HISTORICAL BACKGROUND [13:18 to 32], B. IENG SARY [250:994 to 1125], Background [250:994 to 1000], C. KHIEU SAMPHAN [284:1126 to 1200], Background [285:1126 to 1130]	This photograph cannot be accepted at face value as being authentic without, at a minimum, adducing evidence from the photographer. The photograph is unreliable and unsuitable to prove facts it purports to prove, and it is inadmissible pursuant to Rule 87(3)(c). Further, the photographer is not presently scheduled to testify in Case 002/01. Because Mr. IENG Sary has not been afforded his absolute right under Rule 84(1) to confront the photographer, this document is also inadmissible pursuant to Rule 87(3)(d). For further argument, <i>see</i> IENG Sary's Objections to the Admissibility of Certain Categories of Documents, 6 September 2011, E114, para. 1 (Standards for the admission of documentary evidence set by the Establishment Law), 7-9 (Reliability), 11 (Relevance), 18-19 (Reports, articles and non-contemporaneous documents).
152	Photograph	July 1974	Photograph depicting SITHON, NOUHAK, IENG Sary and KHIEU Samphan	E190.1.109 P 00513582-00513582	Photograph from Lao News Agency Photo Archive via Martin Rathie depicting KHIEU Samphan alias Haem and IENG Sary alias Van with Laotian leaders Sithon and Nouhak during the GRUNK / FUNK international tour in July 1974.	I. HISTORICAL BACKGROUND [13:18 to 32], B. IENG SARY [250:994 to 1125], Background [250:994 to 1000], C. KHIEU SAMPHAN [284:1126 to 1200], Background [285:1126 to 1130]	This photograph cannot be accepted at face value as being authentic without, at a minimum, adducing evidence from the photographer. The photograph is unreliable and unsuitable to prove facts it purports to prove, and it is inadmissible pursuant to Rule 87(3)(c). Further, the photographer is not presently scheduled to testify in Case 002/01. Because Mr. IENG Sary has not been afforded his absolute right under Rule 84(1) to confront the photographer, this document is also inadmissible pursuant to Rule 87(3)(d). For further argument, <i>see</i> IENG Sary's Objections to the Admissibility of Certain Categories of Documents, 6 September 2011, E114, para. 1 (Standards for the admission of documentary evidence set by the Establishment Law), 7-9 (Reliability), 11 (Relevance), 18-19 (Reports, articles and non-contemporaneous documents).
153	Photograph	17 April 1975 - 07 January 1979	Photograph depicting forced labour	E190.1.115 P 00407200-00407200	Photograph from Tuol Sleng Museum depicting mass forced labour digging a canal.	VII. FACTUAL FINDINGS OF JOINT CRIMINAL ENTERPRISE [41:156 to 220], B. COOPERATIVES AND WORKSITES [44:168 to 177]	This photograph cannot be accepted at face value as being authentic without, at a minimum, adducing evidence from the photographer. The photograph is unreliable and unsuitable to prove facts it purports to prove, and it is inadmissible pursuant to Rule 87(3)(c). Further, the photographer is not presently scheduled to testify in Case 002/01. Because Mr. IENG Sary has not been afforded his absolute right under Rule 84(1) to confront the photographer, this document is also inadmissible pursuant to Rule 87(3)(d). For further argument, <i>see</i> IENG Sary's Objections to the Admissibility of Certain Categories of Documents, 6 September 2011, E114, para. 1 (Standards for the admission of documentary evidence set by the Establishment Law), 7-9 (Reliability), 11 (Relevance), 18-19 (Reports, articles and non-contemporaneous documents).

154	Photograph	17 April 1975 - 07 January 1979	Photograph depicting forced labour	E190.1.119 P 00407202-00407202	Photograph from Tuol Sleng Museum depicting mass forced labour digging a canal.	VII. FACTUAL FINDINGS OF JOINT CRIMINAL ENTERPRISE [41:156 to 220], B. COOPERATIVES AND WORKSITES [44:168 to 177]	This photograph cannot be accepted at face value as being authentic without, at a minimum, adducing evidence from the photographer. The photograph is unreliable and unsuitable to prove facts it purports to prove, and it is inadmissible pursuant to Rule 87(3)(c). Further, the photographer is not presently scheduled to testify in Case 002/01. Because Mr. IENG Sary has not been afforded his absolute right under Rule 84(1) to confront the photographer, this document is also inadmissible pursuant to Rule 87(3)(d). For further argument, <i>see</i> IENG Sary's Objections to the Admissibility of Certain Categories of Documents, 6 September 2011, E114, para. 1 (Standards for the admission of documentary evidence set by the Establishment Law), 7-9 (Reliability), 11 (Relevance), 18-19 (Reports, articles and non-contemporaneous documents).
155	Photograph	17 April 1975 - 07 January 1979	Photograph depicting forced labour	E190.1.113 P 00407203-00407203	Photograph from Tuol Sleng Museum depicting mass forced labour digging a canal.	VII. FACTUAL FINDINGS OF JOINT CRIMINAL ENTERPRISE [41:156 to 220], B. COOPERATIVES AND WORKSITES [44:168 to 177]	This photograph cannot be accepted at face value as being authentic without, at a minimum, adducing evidence from the photographer. The photograph is unreliable and unsuitable to prove facts it purports to prove, and it is inadmissible pursuant to Rule 87(3)(c). Further, the photographer is not presently scheduled to testify in Case 002/01. Because Mr. IENG Sary has not been afforded his absolute right under Rule 84(1) to confront the photographer, this document is also inadmissible pursuant to Rule 87(3)(d). For further argument, <i>see</i> IENG Sary's Objections to the Admissibility of Certain Categories of Documents, 6 September 2011, E114, para. 1 (Standards for the admission of documentary evidence set by the Establishment Law), 7-9 (Reliability), 11 (Relevance), 18-19 (Reports, articles and non-contemporaneous documents).
156	Photograph	17 April 1975 - 07 January 1979	Photograph depicting forced labour	E190.1.116 P 00407201-00407201	Photograph from Tuol Sleng Museum depicting mass forced labour digging a canal.	VII. FACTUAL FINDINGS OF JOINT CRIMINAL ENTERPRISE [41:156 to 220], B. COOPERATIVES AND WORKSITES [44:168 to 177]	This photograph cannot be accepted at face value as being authentic without, at a minimum, adducing evidence from the photographer. The photograph is unreliable and unsuitable to prove facts it purports to prove, and it is inadmissible pursuant to Rule 87(3)(c). Further, the photographer is not presently scheduled to testify in Case 002/01. Because Mr. IENG Sary has not been afforded his absolute right under Rule 84(1) to confront the photographer, this document is also inadmissible pursuant to Rule 87(3)(d). For further argument, <i>see</i> IENG Sary's Objections to the Admissibility of Certain Categories of Documents, 6 September 2011, E114, para. 1 (Standards for the admission of documentary evidence set by the Establishment Law), 7-9 (Reliability), 11 (Relevance), 18-19 (Reports, articles and non-contemporaneous documents).

157	Photograph	17 April 1975 - 07 January 1979	Photograph depicting forced labour	E190.1.112 P 00407204-00407204	Photograph from Tuol Sleng Museum depicting mass forced labour digging a canal.	VII. FACTUAL FINDINGS OF JOINT CRIMINAL ENTERPRISE [41:156 to 220], B. COOPERATIVES AND WORKSITES [44:168 to 177]	This photograph cannot be accepted at face value as being authentic without, at a minimum, adducing evidence from the photographer. The photograph is unreliable and unsuitable to prove facts it purports to prove, and it is inadmissible pursuant to Rule 87(3)(c). Further, the photographer is not presently scheduled to testify in Case 002/01. Because Mr. IENG Sary has not been afforded his absolute right under Rule 84(1) to confront the photographer, this document is also inadmissible pursuant to Rule 87(3)(d). For further argument, <i>see</i> IENG Sary's Objections to the Admissibility of Certain Categories of Documents, 6 September 2011, E114, para. 1 (Standards for the admission of documentary evidence set by the Establishment Law), 7-9 (Reliability), 11 (Relevance), 18-19 (Reports, articles and non-contemporaneous documents).
158	Photograph	17 April 1975 - 07 January 1979	Photograph depicting forced labour	E190.1.118 P 00407199-00407199	Photograph from Tuol Sleng Museum depicting mass forced labour digging a canal.	VII. FACTUAL FINDINGS OF JOINT CRIMINAL ENTERPRISE [41:156 to 220], B. COOPERATIVES AND WORKSITES [44:168 to 177]	This photograph cannot be accepted at face value as being authentic without, at a minimum, adducing evidence from the photographer. The photograph is unreliable and unsuitable to prove facts it purports to prove, and it is inadmissible pursuant to Rule 87(3)(c). Further, the photographer is not presently scheduled to testify in Case 002/01. Because Mr. IENG Sary has not been afforded his absolute right under Rule 84(1) to confront the photographer, this document is also inadmissible pursuant to Rule 87(3)(d). For further argument, <i>see</i> IENG Sary's Objections to the Admissibility of Certain Categories of Documents, 6 September 2011, E114, para. 1 (Standards for the admission of documentary evidence set by the Establishment Law), 7-9 (Reliability), 11 (Relevance), 18-19 (Reports, articles and non-contemporaneous documents).
159	Photograph	17 April 1975 - 07 January 1979	Photograph depicting forced labour	E190.1.111 P 00407205-00407205	Photograph from Tuol Sleng Museum depicting mass forced labour digging a canal.	VII. FACTUAL FINDINGS OF JOINT CRIMINAL ENTERPRISE [41:156 to 220], B. COOPERATIVES AND WORKSITES [44:168 to 177]	This photograph cannot be accepted at face value as being authentic without, at a minimum, adducing evidence from the photographer. The photograph is unreliable and unsuitable to prove facts it purports to prove, and it is inadmissible pursuant to Rule 87(3)(c). Further, the photographer is not presently scheduled to testify in Case 002/01. Because Mr. IENG Sary has not been afforded his absolute right under Rule 84(1) to confront the photographer, this document is also inadmissible pursuant to Rule 87(3)(d). For further argument, <i>see</i> IENG Sary's Objections to the Admissibility of Certain Categories of Documents, 6 September 2011, E114, para. 1 (Standards for the admission of documentary evidence set by the Establishment Law), 7-9 (Reliability), 11 (Relevance), 18-19 (Reports, articles and non-contemporaneous documents).

160	Photograph	17 April 1975 - 07 January 1979	Photograph depicting forced labour	E190.1.117 P 00407198-00407198	Photograph from Tuol Sleng Museum depicting mass forced labour digging a canal.	VII. FACTUAL FINDINGS OF JOINT CRIMINAL ENTERPRISE [41:156 to 220], B. COOPERATIVES AND WORKSITES [44:168 to 177]	This photograph cannot be accepted at face value as being authentic without, at a minimum, adducing evidence from the photographer. The photograph is unreliable and unsuitable to prove facts it purports to prove, and it is inadmissible pursuant to Rule 87(3)(c). Further, the photographer is not presently scheduled to testify in Case 002/01. Because Mr. IENG Sary has not been afforded his absolute right under Rule 84(1) to confront the photographer, this document is also inadmissible pursuant to Rule 87(3)(d). For further argument, <i>see</i> IENG Sary's Objections to the Admissibility of Certain Categories of Documents, 6 September 2011, E114, para. 1 (Standards for the admission of documentary evidence set by the Establishment Law), 7-9 (Reliability), 11 (Relevance), 18-19 (Reports, articles and non-contemporaneous documents).
161	Photograph	17 April 1975 - 07 January 1979	Photograph depicting forced labour	E190.1.114 P 00407197-00407197	Photograph from Tuol Sleng Museum depicting mass forced labour digging a canal.	VII. FACTUAL FINDINGS OF JOINT CRIMINAL ENTERPRISE [41:156 to 220], B. COOPERATIVES AND WORKSITES [44:168 to 177]	This photograph cannot be accepted at face value as being authentic without, at a minimum, adducing evidence from the photographer. The photograph is unreliable and unsuitable to prove facts it purports to prove, and it is inadmissible pursuant to Rule 87(3)(c). Further, the photographer is not presently scheduled to testify in Case 002/01. Because Mr. IENG Sary has not been afforded his absolute right under Rule 84(1) to confront the photographer, this document is also inadmissible pursuant to Rule 87(3)(d). For further argument, <i>see</i> IENG Sary's Objections to the Admissibility of Certain Categories of Documents, 6 September 2011, E114, para. 1 (Standards for the admission of documentary evidence set by the Establishment Law), 7-9 (Reliability), 11 (Relevance), 18-19 (Reports, articles and non-contemporaneous documents).
162	Photograph	17 April 1975 - 07 January 1979	Photograph depicting forced labour	E190.1.120 P 00407131-00407131	Photograph from Tuol Sleng Museum depicting mass forced labour in clearing land for agricultural purposes.	VII. FACTUAL FINDINGS OF JOINT CRIMINAL ENTERPRISE [41:156 to 220], B. COOPERATIVES AND WORKSITES [44:168 to 177]	This photograph cannot be accepted at face value as being authentic without, at a minimum, adducing evidence from the photographer. The photograph is unreliable and unsuitable to prove facts it purports to prove, and it is inadmissible pursuant to Rule 87(3)(c). Further, the photographer is not presently scheduled to testify in Case 002/01. Because Mr. IENG Sary has not been afforded his absolute right under Rule 84(1) to confront the photographer, this document is also inadmissible pursuant to Rule 87(3)(d). For further argument, <i>see</i> IENG Sary's Objections to the Admissibility of Certain Categories of Documents, 6 September 2011, E114, para. 1 (Standards for the admission of documentary evidence set by the Establishment Law), 7-9 (Reliability), 11 (Relevance), 18-19 (Reports, articles and non-contemporaneous documents).

163	Photograph	1977	Photograph depicting IENG Sary and Kaysone	E190.1.121 P 00513370-00513370	Photograph from Lao News Agency Photo Archive via Martin Rathie depicting IENG Sary shaking hands with Laotian leader Kaysone.	B. IENG SARY [250:994 to 1125], Roles and Functions [251:1001 to 1017]	This photograph cannot be accepted at face value as being authentic without, at a minimum, adducing evidence from the photographer. The photograph is unreliable and unsuitable to prove facts it purports to prove, and it is inadmissible pursuant to Rule 87(3)(c). Further, the photographer is not presently scheduled to testify in Case 002/01. Because Mr. IENG Sary has not been afforded his absolute right under Rule 84(1) to confront the photographer, this document is also inadmissible pursuant to Rule 87(3)(d). For further argument, <i>see</i> IENG Sary's Objections to the Admissibility of Certain Categories of Documents, 6 September 2011, E114, para. 1 (Standards for the admission of documentary evidence set by the Establishment Law), 7-9 (Reliability), 11 (Relevance), 18-19 (Reports, articles and non-contemporaneous documents).
164	Photograph	1977	Photograph depicting IENG Sary and KHIEU Samphan	E190.1.122 P 00513534-00513534	Photograph from Lao News Agency Photo Archive via Martin Rathie depicting KHIEU Samphan alias Haem and IENG Sary alias Van offering a toast at a banquet for Laotian leaders including President Souphanouvong.	B. IENG SARY [250:994 to 1125], Roles and Functions [251:1001 to 1017], C. KHIEU SAMPHAN [284:1126 to 1200], Roles and Functions [286:1131 to 1152]	This photograph cannot be accepted at face value as being authentic without, at a minimum, adducing evidence from the photographer. The photograph is unreliable and unsuitable to prove facts it purports to prove, and it is inadmissible pursuant to Rule 87(3)(c). Further, the photographer is not presently scheduled to testify in Case 002/01. Because Mr. IENG Sary has not been afforded his absolute right under Rule 84(1) to confront the photographer, this document is also inadmissible pursuant to Rule 87(3)(d). For further argument, <i>see</i> IENG Sary's Objections to the Admissibility of Certain Categories of Documents, 6 September 2011, E114, para. 1 (Standards for the admission of documentary evidence set by the Establishment Law), 7-9 (Reliability), 11 (Relevance), 18-19 (Reports, articles and non-contemporaneous documents).
165	Photograph	1977	Photograph depicting IENG Sary and Souphanouvong	E190.1.123 P 00513562-00513562	Photograph from Lao News Agency Photo Archive via Martin Rathie depicting IENG Sary shaking hands with Laotian President Souphanouvong at Pochentong Airport.	B. IENG SARY [250:994 to 1125], Roles and Functions [251:1001 to 1017]	This photograph cannot be accepted at face value as being authentic without, at a minimum, adducing evidence from the photographer. The photograph is unreliable and unsuitable to prove facts it purports to prove, and it is inadmissible pursuant to Rule 87(3)(c). Further, the photographer is not presently scheduled to testify in Case 002/01. Because Mr. IENG Sary has not been afforded his absolute right under Rule 84(1) to confront the photographer, this document is also inadmissible pursuant to Rule 87(3)(d). For further argument, <i>see</i> IENG Sary's Objections to the Admissibility of Certain Categories of Documents, 6 September 2011, E114, para. 1 (Standards for the admission of documentary evidence set by the Establishment Law), 7-9 (Reliability), 11 (Relevance), 18-19 (Reports, articles and non-contemporaneous documents).

166	Photograph	1977	Photograph depicting IENG Sary, KHIEU Samphan and Souphanouvong	E190.1.124 P 00513595-00513595	Photograph from Lao News Agency Photo Archive via Martin Rathie depicting IENG Sary alias Van and KHIEU Samphan alias Haem with Laotian President Souphanouvong at the Bayon temple.	B. IENG SARY [250:994 to 1125], Roles and Functions [251:1001 to 1017], C. KHIEU SAMPHAN [284:1126 to 1200], Roles and Functions [286:1131 to 1152]	This photograph cannot be accepted at face value as being authentic without, at a minimum, adducing evidence from the photographer. The photograph is unreliable and unsuitable to prove facts it purports to prove, and it is inadmissible pursuant to Rule 87(3)(c). Further, the photographer is not presently scheduled to testify in Case 002/01. Because Mr. IENG Sary has not been afforded his absolute right under Rule 84(1) to confront the photographer, this document is also inadmissible pursuant to Rule 87(3)(d). For further argument, <i>see</i> IENG Sary's Objections to the Admissibility of Certain Categories of Documents, 6 September 2011, E114, para. 1 (Standards for the admission of documentary evidence set by the Establishment Law), 7-9 (Reliability), 11 (Relevance), 18-19 (Reports, articles and non-contemporaneous documents).
167	Photograph	1977	Photograph depicting IENG Sary, KHIEU Samphan and Souphanouvong	E190.1.125 P 00513590-00513590	Photograph from Lao News Agency Photo Archive via Martin Rathie depicting IENG Sary alias Van and KHIEU Samphan alias Haem with Laotian President Souphanouvong observing boy technicians.	B. IENG SARY [250:994 to 1125], Roles and Functions [251:1001 to 1017], C. KHIEU SAMPHAN [284:1126 to 1200], Roles and Functions [286:1131 to 1152]	This photograph cannot be accepted at face value as being authentic without, at a minimum, adducing evidence from the photographer. The photograph is unreliable and unsuitable to prove facts it purports to prove, and it is inadmissible pursuant to Rule 87(3)(c). Further, the photographer is not presently scheduled to testify in Case 002/01. Because Mr. IENG Sary has not been afforded his absolute right under Rule 84(1) to confront the photographer, this document is also inadmissible pursuant to Rule 87(3)(d). For further argument, <i>see</i> IENG Sary's Objections to the Admissibility of Certain Categories of Documents, 6 September 2011, E114, para. 1 (Standards for the admission of documentary evidence set by the Establishment Law), 7-9 (Reliability), 11 (Relevance), 18-19 (Reports, articles and non-contemporaneous documents).
168	Photograph	1977	Photograph depicting IENG Sary, KHIEU Samphan and THIUONN Prasith	E190.1.126 P 00513339-00513339	Photograph from Lao News Agency Photo Archive via Martin Rathie depicting IENG Sary alias Van, KHIEU Samphan alias Haem and THIUONN Prasith alias San atop Angkor Wat with a Lao delegation including President Souphanouvong.	B. IENG SARY [250:994 to 1125], Roles and Functions [251:1001 to 1017], C. KHIEU SAMPHAN [284:1126 to 1200], Roles and Functions [286:1131 to 1152]	This photograph cannot be accepted at face value as being authentic without, at a minimum, adducing evidence from the photographer. The photograph is unreliable and unsuitable to prove facts it purports to prove, and it is inadmissible pursuant to Rule 87(3)(c). Further, the photographer is not presently scheduled to testify in Case 002/01. Because Mr. IENG Sary has not been afforded his absolute right under Rule 84(1) to confront the photographer, this document is also inadmissible pursuant to Rule 87(3)(d). For further argument, <i>see</i> IENG Sary's Objections to the Admissibility of Certain Categories of Documents, 6 September 2011, E114, para. 1 (Standards for the admission of documentary evidence set by the Establishment Law), 7-9 (Reliability), 11 (Relevance), 18-19 (Reports, articles and non-contemporaneous documents).

169	Photograph	1977	Photograph depicting KANG Chap and KHIEU Samphan	E190.1.127 P 00513391-00513391	Photograph from Lao News Agency Photo Archive via Martin Rathie depicting North Zone Secretary KANG Chap alias Sae giving a speech at a Siem Reap banquet in honor of a Lao delegation, with KHIEU Samphan alias Haem.	C. KHIEU SAMPHAN [284:1126 to 1200], Roles and Functions [286:1131 to 1152]	This photograph cannot be accepted at face value as being authentic without, at a minimum, adducing evidence from the photographer. The photograph is unreliable and unsuitable to prove facts it purports to prove, and it is inadmissible pursuant to Rule 87(3)(c). Further, the photographer is not presently scheduled to testify in Case 002/01. Because Mr. IENG Sary has not been afforded his absolute right under Rule 84(1) to confront the photographer, this document is also inadmissible pursuant to Rule 87(3)(d). For further argument, <i>see</i> IENG Sary's Objections to the Admissibility of Certain Categories of Documents, 6 September 2011, E114, para. 1 (Standards for the admission of documentary evidence set by the Establishment Law), 7-9 (Reliability), 11 (Relevance), 18-19 (Reports, articles and non-contemporaneous documents).
170	Photograph	1977	Photograph depicting Kaysone and KHIEU Samphan	E190.1.128 P 00513393-00513393	Photograph from Lao News Agency Photo Archive via Martin Rathie depicting Laotian leader Kaysone making a presentation to KHIEU Samphan alias Haem.	C. KHIEU SAMPHAN [284:1126 to 1200], Roles and Functions [286:1131 to 1152]	This photograph cannot be accepted at face value as being authentic without, at a minimum, adducing evidence from the photographer. The photograph is unreliable and unsuitable to prove facts it purports to prove, and it is inadmissible pursuant to Rule 87(3)(c). Further, the photographer is not presently scheduled to testify in Case 002/01. Because Mr. IENG Sary has not been afforded his absolute right under Rule 84(1) to confront the photographer, this document is also inadmissible pursuant to Rule 87(3)(d). For further argument, <i>see</i> IENG Sary's Objections to the Admissibility of Certain Categories of Documents, 6 September 2011, E114, para. 1 (Standards for the admission of documentary evidence set by the Establishment Law), 7-9 (Reliability), 11 (Relevance), 18-19 (Reports, articles and non-contemporaneous documents).
171	Photograph	1977	Photograph depicting Kaysone, KHIEU Samphan and IENG Sary	E190.1.129 P 00513402-00513402	Photograph from Lao News Agency Photo Archive via Martin Rathie depicting Laotian leader Kaysone with KHIEU Samphan alias Haem and IENG Sary alias Van.	B. IENG SARY [250:994 to 1125], Roles and Functions [251:1001 to 1017], C. KHIEU SAMPHAN [284:1126 to 1200], Roles and Functions [286:1131 to 1152]	This photograph cannot be accepted at face value as being authentic without, at a minimum, adducing evidence from the photographer. The photograph is unreliable and unsuitable to prove facts it purports to prove, and it is inadmissible pursuant to Rule 87(3)(c). Further, the photographer is not presently scheduled to testify in Case 002/01. Because Mr. IENG Sary has not been afforded his absolute right under Rule 84(1) to confront the photographer, this document is also inadmissible pursuant to Rule 87(3)(d). For further argument, <i>see</i> IENG Sary's Objections to the Admissibility of Certain Categories of Documents, 6 September 2011, E114, para. 1 (Standards for the admission of documentary evidence set by the Establishment Law), 7-9 (Reliability), 11 (Relevance), 18-19 (Reports, articles and non-contemporaneous documents).

172	Photograph	1977	Photograph depicting KHAMMA PHOMKONG and KHIEU Samphan	E190.1.130 P 00513406-00513406	Photograph from Lao News Agency Photo Archive via Martin Rathie depicting Laotian leader Khamma Phomkong toasting with KHIEU Samphan alias Haem at a banquet.	C. KHIEU SAMPHAN [284:1126 to 1200], Roles and Functions [286:1131 to 1152]	This photograph cannot be accepted at face value as being authentic without, at a minimum, adducing evidence from the photographer. The photograph is unreliable and unsuitable to prove facts it purports to prove, and it is inadmissible pursuant to Rule 87(3)(c). Further, the photographer is not presently scheduled to testify in Case 002/01. Because Mr. IENG Sary has not been afforded his absolute right under Rule 84(1) to confront the photographer, this document is also inadmissible pursuant to Rule 87(3)(d). For further argument, <i>see</i> IENG Sary's Objections to the Admissibility of Certain Categories of Documents, 6 September 2011, E114, para. 1 (Standards for the admission of documentary evidence set by the Establishment Law), 7-9 (Reliability), 11 (Relevance), 18-19 (Reports, articles and non-contemporaneous documents).
173	Photograph	1977	Photograph depicting KHAMMA PHOMKONG, KHIEU Samphan and IENG Sary	E190.1.131 P 00513405-00513405	Photograph from Lao News Agency Photo Archive via Martin Rathie depicting Khamma Phomkong presenting his credentials to KHIEU Samphan alias Haem and IENG Sary alias Van.	B. IENG SARY [250:994 to 1125], Roles and Functions [251:1001 to 1017], C. KHIEU SAMPHAN [284:1126 to 1200], Roles and Functions [286:1131 to 1152]	This photograph cannot be accepted at face value as being authentic without, at a minimum, adducing evidence from the photographer. The photograph is unreliable and unsuitable to prove facts it purports to prove, and it is inadmissible pursuant to Rule 87(3)(c). Further, the photographer is not presently scheduled to testify in Case 002/01. Because Mr. IENG Sary has not been afforded his absolute right under Rule 84(1) to confront the photographer, this document is also inadmissible pursuant to Rule 87(3)(d). For further argument, <i>see</i> IENG Sary's Objections to the Admissibility of Certain Categories of Documents, 6 September 2011, E114, para. 1 (Standards for the admission of documentary evidence set by the Establishment Law), 7-9 (Reliability), 11 (Relevance), 18-19 (Reports, articles and non-contemporaneous documents).
174	Photograph	1977	Photograph depicting Khamtai and KHIEU Samphan	E190.1.133 P 00513409-00513409	Photograph from Lao News Agency Photo Archive via Martin Rathie depicting Laotian leader Khamtai with KHIEU Samphan alias Haem.	C. KHIEU SAMPHAN [284:1126 to 1200], Roles and Functions [286:1131 to 1152]	This photograph cannot be accepted at face value as being authentic without, at a minimum, adducing evidence from the photographer. The photograph is unreliable and unsuitable to prove facts it purports to prove, and it is inadmissible pursuant to Rule 87(3)(c). Further, the photographer is not presently scheduled to testify in Case 002/01. Because Mr. IENG Sary has not been afforded his absolute right under Rule 84(1) to confront the photographer, this document is also inadmissible pursuant to Rule 87(3)(d). For further argument, <i>see</i> IENG Sary's Objections to the Admissibility of Certain Categories of Documents, 6 September 2011, E114, para. 1 (Standards for the admission of documentary evidence set by the Establishment Law), 7-9 (Reliability), 11 (Relevance), 18-19 (Reports, articles and non-contemporaneous documents).

175	Photograph	1977	Photograph depicting Khamtai and KHIEU Samphan	E190.1.132 P 00513408- 00513408	Photograph from Lao News Agency Photo Archive via Martin Rathie depicting Laotian leader Khamtai pinning medal on KHIEU Samphan alias Haem.	C. KHIEU SAMPHAN [284:1126 to 1200], Roles and Functions [286:1131 to 1152]	This photograph cannot be accepted at face value as being authentic without, at a minimum, adducing evidence from the photographer. The photograph is unreliable and unsuitable to prove facts it purports to prove, and it is inadmissible pursuant to Rule 87(3)(c). Further, the photographer is not presently scheduled to testify in Case 002/01. Because Mr. IENG Sary has not been afforded his absolute right under Rule 84(1) to confront the photographer, this document is also inadmissible pursuant to Rule 87(3)(d). For further argument, <i>see</i> IENG Sary's Objections to the Admissibility of Certain Categories of Documents, 6 September 2011, E114, para. 1 (Standards for the admission of documentary evidence set by the Establishment Law), 7-9 (Reliability), 11 (Relevance), 18-19 (Reports, articles and non-contemporaneous documents).
176	Photograph	1977	Photograph depicting KHIEU Samphan	E190.1.138 P 00513622- 00513622	Photograph from Lao News Agency Photo Archive via Martin Rathie depicting toast at Siem Reap banquet with KHIEU Samphan alias Haem.	C. KHIEU SAMPHAN [284:1126 to 1200], Roles and Functions [286:1131 to 1152]	This photograph cannot be accepted at face value as being authentic without, at a minimum, adducing evidence from the photographer. The photograph is unreliable and unsuitable to prove facts it purports to prove, and it is inadmissible pursuant to Rule 87(3)(c). Further, the photographer is not presently scheduled to testify in Case 002/01. Because Mr. IENG Sary has not been afforded his absolute right under Rule 84(1) to confront the photographer, this document is also inadmissible pursuant to Rule 87(3)(d). For further argument, <i>see</i> IENG Sary's Objections to the Admissibility of Certain Categories of Documents, 6 September 2011, E114, para. 1 (Standards for the admission of documentary evidence set by the Establishment Law), 7-9 (Reliability), 11 (Relevance), 18-19 (Reports, articles and non-contemporaneous documents).
177	Photograph	1977	Photograph depicting KHIEU Samphan	E190.1.136 P 00513426- 00513426	Photograph from Lao News Agency Photo Archive via Martin Rathie depicting KHIEU Samphan alias Haem giving a speech.	C. KHIEU SAMPHAN [284:1126 to 1200], Roles and Functions [286:1131 to 1152]	This photograph cannot be accepted at face value as being authentic without, at a minimum, adducing evidence from the photographer. The photograph is unreliable and unsuitable to prove facts it purports to prove, and it is inadmissible pursuant to Rule 87(3)(c). Further, the photographer is not presently scheduled to testify in Case 002/01. Because Mr. IENG Sary has not been afforded his absolute right under Rule 84(1) to confront the photographer, this document is also inadmissible pursuant to Rule 87(3)(d). For further argument, <i>see</i> IENG Sary's Objections to the Admissibility of Certain Categories of Documents, 6 September 2011, E114, para. 1 (Standards for the admission of documentary evidence set by the Establishment Law), 7-9 (Reliability), 11 (Relevance), 18-19 (Reports, articles and non-contemporaneous documents).

178	Photograph	1977	Photograph depicting KHIEU Samphan	E190.1.137 P 00513533-00513533	Photograph from Lao News Agency Photo Archive via Martin Rathie depicting KHIEU Samphan alias Haem at a Phnom Penh Banquet.	C. KHIEU SAMPHAN [284:1126 to 1200], Roles and Functions [286:1131 to 1152]	This photograph cannot be accepted at face value as being authentic without, at a minimum, adducing evidence from the photographer. The photograph is unreliable and unsuitable to prove facts it purports to prove, and it is inadmissible pursuant to Rule 87(3)(c). Further, the photographer is not presently scheduled to testify in Case 002/01. Because Mr. IENG Sary has not been afforded his absolute right under Rule 84(1) to confront the photographer, this document is also inadmissible pursuant to Rule 87(3)(d). For further argument, <i>see</i> IENG Sary's Objections to the Admissibility of Certain Categories of Documents, 6 September 2011, E114, para. 1 (Standards for the admission of documentary evidence set by the Establishment Law), 7-9 (Reliability), 11 (Relevance), 18-19 (Reports, articles and non-contemporaneous documents).
179	Photograph	1977	Photograph depicting KHIEU Samphan	E190.1.135 P 00513523-00513523	Photograph from Lao News Agency Photo Archive via Martin Rathie depicting KHIEU Samphan alias Haem at a banquet with a Lao delegation.	C. KHIEU SAMPHAN [284:1126 to 1200], Roles and Functions [286:1131 to 1152]	This photograph cannot be accepted at face value as being authentic without, at a minimum, adducing evidence from the photographer. The photograph is unreliable and unsuitable to prove facts it purports to prove, and it is inadmissible pursuant to Rule 87(3)(c). Further, the photographer is not presently scheduled to testify in Case 002/01. Because Mr. IENG Sary has not been afforded his absolute right under Rule 84(1) to confront the photographer, this document is also inadmissible pursuant to Rule 87(3)(d). For further argument, <i>see</i> IENG Sary's Objections to the Admissibility of Certain Categories of Documents, 6 September 2011, E114, para. 1 (Standards for the admission of documentary evidence set by the Establishment Law), 7-9 (Reliability), 11 (Relevance), 18-19 (Reports, articles and non-contemporaneous documents).
180	Photograph	1977	Photograph depicting KHIEU Samphan	E190.1.134 P 00513564-00513564	Photograph from Lao News Agency Photo Archive via Martin Rathie depicting KHIEU Samphan alias Haem at a Siem Reap banquet in honor of visiting Lao delegation.	C. KHIEU SAMPHAN [284:1126 to 1200], Roles and Functions [286:1131 to 1152]	This photograph cannot be accepted at face value as being authentic without, at a minimum, adducing evidence from the photographer. The photograph is unreliable and unsuitable to prove facts it purports to prove, and it is inadmissible pursuant to Rule 87(3)(c). Further, the photographer is not presently scheduled to testify in Case 002/01. Because Mr. IENG Sary has not been afforded his absolute right under Rule 84(1) to confront the photographer, this document is also inadmissible pursuant to Rule 87(3)(d). For further argument, <i>see</i> IENG Sary's Objections to the Admissibility of Certain Categories of Documents, 6 September 2011, E114, para. 1 (Standards for the admission of documentary evidence set by the Establishment Law), 7-9 (Reliability), 11 (Relevance), 18-19 (Reports, articles and non-contemporaneous documents).

181	Photograph	1977	Photograph depicting KHIEU Samphan and IENG Sary	E190.1.144 P 00513398-00513398	Photograph from Lao News Agency Photo Archive via Martin Rathie depicting Lao leader Kaysone toasting KHIEU Samphan alias Haem and IENG Sary alias Van.	B. IENG SARY [250:994 to 1125], Roles and Functions [251:1001 to 1017], C. KHIEU SAMPHAN [284:1126 to 1200], Roles and Functions [286:1131 to 1152]	This photograph cannot be accepted at face value as being authentic without, at a minimum, adducing evidence from the photographer. The photograph is unreliable and unsuitable to prove facts it purports to prove, and it is inadmissible pursuant to Rule 87(3)(c). Further, the photographer is not presently scheduled to testify in Case 002/01. Because Mr. IENG Sary has not been afforded his absolute right under Rule 84(1) to confront the photographer, this document is also inadmissible pursuant to Rule 87(3)(d). For further argument, <i>see</i> IENG Sary's Objections to the Admissibility of Certain Categories of Documents, 6 September 2011, E114, para. 1 (Standards for the admission of documentary evidence set by the Establishment Law), 7-9 (Reliability), 11 (Relevance), 18-19 (Reports, articles and non-contemporaneous documents).
182	Photograph	1977	Photograph depicting KHIEU Samphan and IENG Sary	E190.1.142 P 00513338-00513338	Photograph from Lao News Agency Photo Archive via Martin Rathie depicting KHIEU Samphan alias Haem and IENG Sary alias Van with Laotian President Souphanouvong at Angkor Wat.	B. IENG SARY [250:994 to 1125], Roles and Functions [251:1001 to 1017], C. KHIEU SAMPHAN [284:1126 to 1200], Roles and Functions [286:1131 to 1152]	This photograph cannot be accepted at face value as being authentic without, at a minimum, adducing evidence from the photographer. The photograph is unreliable and unsuitable to prove facts it purports to prove, and it is inadmissible pursuant to Rule 87(3)(c). Further, the photographer is not presently scheduled to testify in Case 002/01. Because Mr. IENG Sary has not been afforded his absolute right under Rule 84(1) to confront the photographer, this document is also inadmissible pursuant to Rule 87(3)(d). For further argument, <i>see</i> IENG Sary's Objections to the Admissibility of Certain Categories of Documents, 6 September 2011, E114, para. 1 (Standards for the admission of documentary evidence set by the Establishment Law), 7-9 (Reliability), 11 (Relevance), 18-19 (Reports, articles and non-contemporaneous documents).
183	Photograph	1977	Photograph depicting KHIEU Samphan and IENG Sary	E190.1.139 P 00513566-00513566	Photograph from Lao News Agency Photo Archive via Martin Rathie depicting Siem Reap talks with KHIEU Samphan alias Haem and IENG Sary alias Van.	B. IENG SARY [250:994 to 1125], Roles and Functions [251:1001 to 1017], C. KHIEU SAMPHAN [284:1126 to 1200], Roles and Functions [286:1131 to 1152]	This photograph cannot be accepted at face value as being authentic without, at a minimum, adducing evidence from the photographer. The photograph is unreliable and unsuitable to prove facts it purports to prove, and it is inadmissible pursuant to Rule 87(3)(c). Further, the photographer is not presently scheduled to testify in Case 002/01. Because Mr. IENG Sary has not been afforded his absolute right under Rule 84(1) to confront the photographer, this document is also inadmissible pursuant to Rule 87(3)(d). For further argument, <i>see</i> IENG Sary's Objections to the Admissibility of Certain Categories of Documents, 6 September 2011, E114, para. 1 (Standards for the admission of documentary evidence set by the Establishment Law), 7-9 (Reliability), 11 (Relevance), 18-19 (Reports, articles and non-contemporaneous documents).

184	Photograph	1977	Photograph depicting KHIEU Samphan and IENG Sary	E190.1.143 P 00513532- 00513532	Photograph from Lao News Agency Photo Archive via Martin Rathie depicting Phnom Penh banquet anthem with KHIEU Samphan alias Haem and IENG Sary alias Van.	B. IENG SARY [250:994 to 1125], Roles and Functions [251:1001 to 1017], C. KHIEU SAMPHAN [284:1126 to 1200], Roles and Functions [286:1131 to 1152]	This photograph cannot be accepted at face value as being authentic without, at a minimum, adducing evidence from the photographer. The photograph is unreliable and unsuitable to prove facts it purports to prove, and it is inadmissible pursuant to Rule 87(3)(c). Further, the photographer is not presently scheduled to testify in Case 002/01. Because Mr. IENG Sary has not been afforded his absolute right under Rule 84(1) to confront the photographer, this document is also inadmissible pursuant to Rule 87(3)(d). For further argument, <i>see</i> IENG Sary's Objections to the Admissibility of Certain Categories of Documents, 6 September 2011, E114, para. 1 (Standards for the admission of documentary evidence set by the Establishment Law), 7-9 (Reliability), 11 (Relevance), 18-19 (Reports, articles and non-contemporaneous documents).
185	Photograph	1977	Photograph depicting KHIEU Samphan and IENG Sary	E190.1.140 P 00513344- 00513344	Photograph from Lao News Agency Photo Archive via Martin Rathie depicting KHIEU Samphan alias Haem and IENG Sary alias Van with Laotian leaders including President Souphanouvong at the Bayon temple.	B. IENG SARY [250:994 to 1125], Roles and Functions [251:1001 to 1017], C. KHIEU SAMPHAN [284:1126 to 1200], Roles and Functions [286:1131 to 1152]	This photograph cannot be accepted at face value as being authentic without, at a minimum, adducing evidence from the photographer. The photograph is unreliable and unsuitable to prove facts it purports to prove, and it is inadmissible pursuant to Rule 87(3)(c). Further, the photographer is not presently scheduled to testify in Case 002/01. Because Mr. IENG Sary has not been afforded his absolute right under Rule 84(1) to confront the photographer, this document is also inadmissible pursuant to Rule 87(3)(d). For further argument, <i>see</i> IENG Sary's Objections to the Admissibility of Certain Categories of Documents, 6 September 2011, E114, para. 1 (Standards for the admission of documentary evidence set by the Establishment Law), 7-9 (Reliability), 11 (Relevance), 18-19 (Reports, articles and non-contemporaneous documents).
186	Photograph	1977	Photograph depicting KHIEU Samphan and IENG Sary	E190.1.141 P 00513345- 00513345	Photograph from Lao News Agency Photo Archive via Martin Rathie depicting KHIEU Samphan alias Haem and IENG Sary alias Van sipping coconut juice with Laotian President Souphanouvong and his delegation during a tour of Angkor Wat.	B. IENG SARY [250:994 to 1125], Roles and Functions [251:1001 to 1017], C. KHIEU SAMPHAN [284:1126 to 1200], Roles and Functions [286:1131 to 1152]	This photograph cannot be accepted at face value as being authentic without, at a minimum, adducing evidence from the photographer. The photograph is unreliable and unsuitable to prove facts it purports to prove, and it is inadmissible pursuant to Rule 87(3)(c). Further, the photographer is not presently scheduled to testify in Case 002/01. Because Mr. IENG Sary has not been afforded his absolute right under Rule 84(1) to confront the photographer, this document is also inadmissible pursuant to Rule 87(3)(d). For further argument, <i>see</i> IENG Sary's Objections to the Admissibility of Certain Categories of Documents, 6 September 2011, E114, para. 1 (Standards for the admission of documentary evidence set by the Establishment Law), 7-9 (Reliability), 11 (Relevance), 18-19 (Reports, articles and non-contemporaneous documents).

187	Photograph	1977	Photograph depicting KHIEU Samphan and Sithon	E190.1.146 P 00513435-00513435	Photograph from Lao News Agency Photo Archive via Martin Rathie depicting KHIEU Samphan alias Haem toasting Laotian leader Sithon.	C. KHIEU SAMPHAN [284:1126 to 1200], Roles and Functions [286:1131 to 1152]	This photograph cannot be accepted at face value as being authentic without, at a minimum, adducing evidence from the photographer. The photograph is unreliable and unsuitable to prove facts it purports to prove, and it is inadmissible pursuant to Rule 87(3)(c). Further, the photographer is not presently scheduled to testify in Case 002/01. Because Mr. IENG Sary has not been afforded his absolute right under Rule 84(1) to confront the photographer, this document is also inadmissible pursuant to Rule 87(3)(d). For further argument, <i>see</i> IENG Sary's Objections to the Admissibility of Certain Categories of Documents, 6 September 2011, E114, para. 1 (Standards for the admission of documentary evidence set by the Establishment Law), 7-9 (Reliability), 11 (Relevance), 18-19 (Reports, articles and non-contemporaneous documents).
188	Photograph	1977	Photograph depicting KHIEU Samphan and Sithon	E190.1.145 P 00513431-00513431	Photograph from Lao News Agency Photo Archive via Martin Rathie depicting exchange of gifts between KHIEU Samphan alias Haem and Laotian leader Sithon.	C. KHIEU SAMPHAN [284:1126 to 1200], Roles and Functions [286:1131 to 1152]	This photograph cannot be accepted at face value as being authentic without, at a minimum, adducing evidence from the photographer. The photograph is unreliable and unsuitable to prove facts it purports to prove, and it is inadmissible pursuant to Rule 87(3)(c). Further, the photographer is not presently scheduled to testify in Case 002/01. Because Mr. IENG Sary has not been afforded his absolute right under Rule 84(1) to confront the photographer, this document is also inadmissible pursuant to Rule 87(3)(d). For further argument, <i>see</i> IENG Sary's Objections to the Admissibility of Certain Categories of Documents, 6 September 2011, E114, para. 1 (Standards for the admission of documentary evidence set by the Establishment Law), 7-9 (Reliability), 11 (Relevance), 18-19 (Reports, articles and non-contemporaneous documents).
189	Photograph	1977	Photograph depicting KHIEU Samphan and Souphanouvong	E190.1.147 P 00513437-00513437	Photograph from the Lao News Agency Photo Archives depicting KHIEU Samphan alias Haem greeting Lao President Souphanouvong as IENG Sary alias Van watches.	B. IENG SARY [250:994 to 1125], Roles and Functions [251:1001 to 1017], C. KHIEU SAMPHAN [284:1126 to 1200], Roles and Functions [286:1131 to 1152]	This photograph cannot be accepted at face value as being authentic without, at a minimum, adducing evidence from the photographer. The photograph is unreliable and unsuitable to prove facts it purports to prove, and it is inadmissible pursuant to Rule 87(3)(c). Further, the photographer is not presently scheduled to testify in Case 002/01. Because Mr. IENG Sary has not been afforded his absolute right under Rule 84(1) to confront the photographer, this document is also inadmissible pursuant to Rule 87(3)(d). For further argument, <i>see</i> IENG Sary's Objections to the Admissibility of Certain Categories of Documents, 6 September 2011, E114, para. 1 (Standards for the admission of documentary evidence set by the Establishment Law), 7-9 (Reliability), 11 (Relevance), 18-19 (Reports, articles and non-contemporaneous documents).

190	Photograph	1977	Photograph depicting KHIEU Samphan and Souphanouvong	E190.1.148 P 00513425-00513425	Photograph from Lao News Agency Photo Archive via Martin Rathie depicting KHIEU Samphan alias Haem and Laotian President Souphanouvong at the beach.	C. KHIEU SAMPHAN [284:1126 to 1200], Roles and Functions [286:1131 to 1152]	This photograph cannot be accepted at face value as being authentic without, at a minimum, adducing evidence from the photographer. The photograph is unreliable and unsuitable to prove facts it purports to prove, and it is inadmissible pursuant to Rule 87(3)(c). Further, the photographer is not presently scheduled to testify in Case 002/01. Because Mr. IENG Sary has not been afforded his absolute right under Rule 84(1) to confront the photographer, this document is also inadmissible pursuant to Rule 87(3)(d). For further argument, <i>see</i> IENG Sary's Objections to the Admissibility of Certain Categories of Documents, 6 September 2011, E114, para. 1 (Standards for the admission of documentary evidence set by the Establishment Law), 7-9 (Reliability), 11 (Relevance), 18-19 (Reports, articles and non-contemporaneous documents).
191	Photograph	1977	Photograph depicting KHIEU Samphan, IENG Sary and IENG Thirith	E190.1.149 P 00513502-00513502	Photograph from Lao News Agency Photo Archive via Martin Rathie depicting official talks between a Lao delegation lead by President Souphanouvong and depicting IENG Sary alias Van, KHIEU Samphan alias Haem, IENG Thirith alias Phea and THIOUNN Prasith alias San.	B. IENG SARY [250:994 to 1125], Roles and Functions [251:1001 to 1017], C. KHIEU SAMPHAN [284:1126 to 1200], Roles and Functions [286:1131 to 1152], D. IENG THIRITH [304:1201 to 1298], Roles and Functions [305:1207 to 1226]	This photograph cannot be accepted at face value as being authentic without, at a minimum, adducing evidence from the photographer. The photograph is unreliable and unsuitable to prove facts it purports to prove, and it is inadmissible pursuant to Rule 87(3)(c). Further, the photographer is not presently scheduled to testify in Case 002/01. Because Mr. IENG Sary has not been afforded his absolute right under Rule 84(1) to confront the photographer, this document is also inadmissible pursuant to Rule 87(3)(d). For further argument, <i>see</i> IENG Sary's Objections to the Admissibility of Certain Categories of Documents, 6 September 2011, E114, para. 1 (Standards for the admission of documentary evidence set by the Establishment Law), 7-9 (Reliability), 11 (Relevance), 18-19 (Reports, articles and non-contemporaneous documents).
192	Photograph	1977	Photograph depicting KHIEU Samphan, IENG Sary and KANG Chap	E190.1.161 P 00513361-00513361	Photograph from Lao News Agency Photo Archive via Martin Rathie depicting KHIEU Samphan alias Haem, IENG Sary alias Van and North Zone Secretary KANG Chap alias Sae at the Bayon temple with Laotian delegation including President Souphanouvong.	B. IENG SARY [250:994 to 1125], Roles and Functions [251:1001 to 1017], C. KHIEU SAMPHAN [284:1126 to 1200], Roles and Functions [286:1131 to 1152]	This photograph cannot be accepted at face value as being authentic without, at a minimum, adducing evidence from the photographer. The photograph is unreliable and unsuitable to prove facts it purports to prove, and it is inadmissible pursuant to Rule 87(3)(c). Further, the photographer is not presently scheduled to testify in Case 002/01. Because Mr. IENG Sary has not been afforded his absolute right under Rule 84(1) to confront the photographer, this document is also inadmissible pursuant to Rule 87(3)(d). For further argument, <i>see</i> IENG Sary's Objections to the Admissibility of Certain Categories of Documents, 6 September 2011, E114, para. 1 (Standards for the admission of documentary evidence set by the Establishment Law), 7-9 (Reliability), 11 (Relevance), 18-19 (Reports, articles and non-contemporaneous documents).

193	Photograph	1977	Photograph depicting KHIEU Samphan, IENG Sary and Sophanouvong	E190.1.151 P 00513343- 00513343	Photograph from Lao News Agency Photo Archive via Martin Rathie depicting KHIEU Samphan alias Haem and IENG Sary alias Van with Laotian President Sophanouvong at Banteay Srey.	B. IENG SARY [250:994 to 1125], Roles and Functions [251:1001 to 1017], C. KHIEU SAMPHAN [284:1126 to 1200], Roles and Functions [286:1131 to 1152]	This photograph cannot be accepted at face value as being authentic without, at a minimum, adducing evidence from the photographer. The photograph is unreliable and unsuitable to prove facts it purports to prove, and it is inadmissible pursuant to Rule 87(3)(c). Further, the photographer is not presently scheduled to testify in Case 002/01. Because Mr. IENG Sary has not been afforded his absolute right under Rule 84(1) to confront the photographer, this document is also inadmissible pursuant to Rule 87(3)(d). For further argument, <i>see</i> IENG Sary's Objections to the Admissibility of Certain Categories of Documents, 6 September 2011, E114, para. 1 (Standards for the admission of documentary evidence set by the Establishment Law), 7-9 (Reliability), 11 (Relevance), 18-19 (Reports, articles and non-contemporaneous documents).
194	Photograph	1977	Photograph depicting KHIEU Samphan, IENG Sary and Sophanouvong	E190.1.152 P 00513387- 00513387	Photograph from Lao News Agency Photo Archive via Martin Rathie depicting KHIEU Samphan alias Haem and IENG Sary alias Van with Laotian President Sophanouvong at a Kampong Som warehouse.	B. IENG SARY [250:994 to 1125], Roles and Functions [251:1001 to 1017], C. KHIEU SAMPHAN [284:1126 to 1200], Roles and Functions [286:1131 to 1152]	This photograph cannot be accepted at face value as being authentic without, at a minimum, adducing evidence from the photographer. The photograph is unreliable and unsuitable to prove facts it purports to prove, and it is inadmissible pursuant to Rule 87(3)(c). Further, the photographer is not presently scheduled to testify in Case 002/01. Because Mr. IENG Sary has not been afforded his absolute right under Rule 84(1) to confront the photographer, this document is also inadmissible pursuant to Rule 87(3)(d). For further argument, <i>see</i> IENG Sary's Objections to the Admissibility of Certain Categories of Documents, 6 September 2011, E114, para. 1 (Standards for the admission of documentary evidence set by the Establishment Law), 7-9 (Reliability), 11 (Relevance), 18-19 (Reports, articles and non-contemporaneous documents).
195	Photograph	1977	Photograph depicting KHIEU Samphan, IENG Sary and Sophanouvong	E190.1.153 P 00513524- 00513524	Photograph from Lao News Agency Photo Archive via Martin Rathie depicting KHIEU Samphan alias Haem and IENG Sary alias Van with Laotian President Sophanouvong.	B. IENG SARY [250:994 to 1125], Roles and Functions [251:1001 to 1017], C. KHIEU SAMPHAN [284:1126 to 1200], Roles and Functions [286:1131 to 1152]	This photograph cannot be accepted at face value as being authentic without, at a minimum, adducing evidence from the photographer. The photograph is unreliable and unsuitable to prove facts it purports to prove, and it is inadmissible pursuant to Rule 87(3)(c). Further, the photographer is not presently scheduled to testify in Case 002/01. Because Mr. IENG Sary has not been afforded his absolute right under Rule 84(1) to confront the photographer, this document is also inadmissible pursuant to Rule 87(3)(d). For further argument, <i>see</i> IENG Sary's Objections to the Admissibility of Certain Categories of Documents, 6 September 2011, E114, para. 1 (Standards for the admission of documentary evidence set by the Establishment Law), 7-9 (Reliability), 11 (Relevance), 18-19 (Reports, articles and non-contemporaneous documents).

196	Photograph	1977	Photograph depicting KHIEU Samphan, IENG Sary and Souphanouvong	E190.1.155 P 00513506-00513506	Photograph from Lao News Agency Photo Archive via Martin Rathie depicting Phnom Penh banquet with KHIEU Samphan alias Haem, IENG Sary alias Van and Lao President Souphanouvong.	B. IENG SARY [250:994 to 1125], Roles and Functions [251:1001 to 1017], C. KHIEU SAMPHAN [284:1126 to 1200], Roles and Functions [286:1131 to 1152]	This photograph cannot be accepted at face value as being authentic without, at a minimum, adducing evidence from the photographer. The photograph is unreliable and unsuitable to prove facts it purports to prove, and it is inadmissible pursuant to Rule 87(3)(c). Further, the photographer is not presently scheduled to testify in Case 002/01. Because Mr. IENG Sary has not been afforded his absolute right under Rule 84(1) to confront the photographer, this document is also inadmissible pursuant to Rule 87(3)(d). For further argument, <i>see</i> IENG Sary's Objections to the Admissibility of Certain Categories of Documents, 6 September 2011, E114, para. 1 (Standards for the admission of documentary evidence set by the Establishment Law), 7-9 (Reliability), 11 (Relevance), 18-19 (Reports, articles and non-contemporaneous documents).
197	Photograph	1977	Photograph depicting KHIEU Samphan, IENG Sary and Souphanouvong	E190.1.154 P 00513362-00513362	Photograph from Lao News Agency Photo Archive via Martin Rathie depicting KHIEU Samphan alias Haem and IENG Sary alias Van with Lao President Souphanouvong atop Angkor Wat.	B. IENG SARY [250:994 to 1125], Roles and Functions [251:1001 to 1017], C. KHIEU SAMPHAN [284:1126 to 1200], Roles and Functions [286:1131 to 1152]	This photograph cannot be accepted at face value as being authentic without, at a minimum, adducing evidence from the photographer. The photograph is unreliable and unsuitable to prove facts it purports to prove, and it is inadmissible pursuant to Rule 87(3)(c). Further, the photographer is not presently scheduled to testify in Case 002/01. Because Mr. IENG Sary has not been afforded his absolute right under Rule 84(1) to confront the photographer, this document is also inadmissible pursuant to Rule 87(3)(d). For further argument, <i>see</i> IENG Sary's Objections to the Admissibility of Certain Categories of Documents, 6 September 2011, E114, para. 1 (Standards for the admission of documentary evidence set by the Establishment Law), 7-9 (Reliability), 11 (Relevance), 18-19 (Reports, articles and non-contemporaneous documents).
198	Photograph	1977	Photograph depicting KHIEU Samphan, IENG Sary, IENG Thirith and YUN Yat	E190.1.156 P 00513504-00513504	Photograph from Lao News Agency Photo Archive via Martin Rathie depicting KHIEU Samphan alias Haem, IENG Sary alias Van, IENG Thirith alias Phea and YUN Yat alias At at a pennant ceremony.	B. IENG SARY [250:994 to 1125], Roles and Functions [251:1001 to 1017], C. KHIEU SAMPHAN [284:1126 to 1200], Roles and Functions [286:1131 to 1152], D. IENG THIRITH [304:1201 to 1298], Roles and Functions [305:1207 to 1226]	This photograph cannot be accepted at face value as being authentic without, at a minimum, adducing evidence from the photographer. The photograph is unreliable and unsuitable to prove facts it purports to prove, and it is inadmissible pursuant to Rule 87(3)(c). Further, the photographer is not presently scheduled to testify in Case 002/01. Because Mr. IENG Sary has not been afforded his absolute right under Rule 84(1) to confront the photographer, this document is also inadmissible pursuant to Rule 87(3)(d). For further argument, <i>see</i> IENG Sary's Objections to the Admissibility of Certain Categories of Documents, 6 September 2011, E114, para. 1 (Standards for the admission of documentary evidence set by the Establishment Law), 7-9 (Reliability), 11 (Relevance), 18-19 (Reports, articles and non-contemporaneous documents).

199	Photograph	1977	Photograph depicting KHIEU Samphan, IENG Sary, IENG Thirith, YUN Yat and Souphanouvong	E190.1.157 P 00513521-00513521	Photograph from Lao News Agency Photo Archive via Martin Rathie depicting KHIEU Samphan alias Haem, IENG Sary alias Van, IENG Thirith alias Phea, and YUN Yat alias At with Laotian President Souphanouvong.	B. IENG SARY [250:994 to 1125], Roles and Functions [251:1001 to 1017], C. KHIEU SAMPHAN [284:1126 to 1200], Roles and Functions [286:1131 to 1152], D. IENG THIRITH [304:1201 to 1298], Roles and Functions [305:1207 to 1226]	This photograph cannot be accepted at face value as being authentic without, at a minimum, adducing evidence from the photographer. The photograph is unreliable and unsuitable to prove facts it purports to prove, and it is inadmissible pursuant to Rule 87(3)(c). Further, the photographer is not presently scheduled to testify in Case 002/01. Because Mr. IENG Sary has not been afforded his absolute right under Rule 84(1) to confront the photographer, this document is also inadmissible pursuant to Rule 87(3)(d). For further argument, <i>see</i> IENG Sary's Objections to the Admissibility of Certain Categories of Documents, 6 September 2011, E114, para. 1 (Standards for the admission of documentary evidence set by the Establishment Law), 7-9 (Reliability), 11 (Relevance), 18-19 (Reports, articles and non-contemporaneous documents).
200	Photograph	1977	Photograph depicting KHIEU Samphan, IENG Sary, IENG Thirith, YUN Yat, So Hong and SAM San	E190.1.158 P 00513420-00513420	Photograph from Lao News Agency Photo Archive via Martin Rathie depicting KHIEU Samphan alias Haem, IENG Sary alias Van, IENG Thirith alias Phea, YUN Yat alias At, SALOTH Ban alias SO Hong alias LOTH Nitya alias SA Lothya alias Bien alias Phat and SAM San with a Laotian delegation including President Souphanouvong.	B. IENG SARY [250:994 to 1125], Roles and Functions [251:1001 to 1017], C. KHIEU SAMPHAN [284:1126 to 1200], Roles and Functions [286:1131 to 1152], D. IENG THIRITH [304:1201 to 1298], Roles and Functions [305:1207 to 1226]	This photograph cannot be accepted at face value as being authentic without, at a minimum, adducing evidence from the photographer. The photograph is unreliable and unsuitable to prove facts it purports to prove, and it is inadmissible pursuant to Rule 87(3)(c). Further, the photographer is not presently scheduled to testify in Case 002/01. Because Mr. IENG Sary has not been afforded his absolute right under Rule 84(1) to confront the photographer, this document is also inadmissible pursuant to Rule 87(3)(d). For further argument, <i>see</i> IENG Sary's Objections to the Admissibility of Certain Categories of Documents, 6 September 2011, E114, para. 1 (Standards for the admission of documentary evidence set by the Establishment Law), 7-9 (Reliability), 11 (Relevance), 18-19 (Reports, articles and non-contemporaneous documents).
201	Photograph	1977	Photograph depicting KHIEU Samphan, IENG Sary, NUON Chea, VON Vet, VAN Rith and THIOUNN Prasith	E190.1.159 P 00513417-00513417	Photograph from Lao News Agency Photo Archive via Martin Rathie depicting KHIEU Samphan alias Haem, IENG Sary alias Van, NUON Chea, PENH Thuok alias VON Vet, VAN Rith alias Reut and THIOUNN Prasith alias San at Pochentong Airport.	A. NUON CHEA [214:862 to 993], Roles and Functions [215:869 to 894], B. IENG SARY [250:994 to 1125], Roles and Functions [251:1001 to 1017], C. KHIEU SAMPHAN [284:1126 to 1200], Roles and Functions [286:1131 to 1152]	This photograph cannot be accepted at face value as being authentic without, at a minimum, adducing evidence from the photographer. The photograph is unreliable and unsuitable to prove facts it purports to prove, and it is inadmissible pursuant to Rule 87(3)(c). Further, the photographer is not presently scheduled to testify in Case 002/01. Because Mr. IENG Sary has not been afforded his absolute right under Rule 84(1) to confront the photographer, this document is also inadmissible pursuant to Rule 87(3)(d). For further argument, <i>see</i> IENG Sary's Objections to the Admissibility of Certain Categories of Documents, 6 September 2011, E114, para. 1 (Standards for the admission of documentary evidence set by the Establishment Law), 7-9 (Reliability), 11 (Relevance), 18-19 (Reports, articles and non-contemporaneous documents).

202	Photograph	1977	Photograph depicting LENG Sim Hak	E190.1.162 P 00513458- 00513458	Photograph from Lao News Agency Photo Archive via Martin Rathie depicting LENG Sim Hak alias Sei farewell at conclusion of mission to Laos.	S-21 Security Centre [108:415 to 475], D. IENG THIRITH [304:1201 to 1298], Roles and Functions [305:1207 to 1226]	This photograph cannot be accepted at face value as being authentic without, at a minimum, adducing evidence from the photographer. The photograph is unreliable and unsuitable to prove facts it purports to prove, and it is inadmissible pursuant to Rule 87(3)(c). Further, the photographer is not presently scheduled to testify in Case 002/01. Because Mr. IENG Sary has not been afforded his absolute right under Rule 84(1) to confront the photographer, this document is also inadmissible pursuant to Rule 87(3)(d). For further argument, <i>see</i> IENG Sary's Objections to the Admissibility of Certain Categories of Documents, 6 September 2011, E114, para. 1 (Standards for the admission of documentary evidence set by the Establishment Law), 7-9 (Reliability), 11 (Relevance), 18-19 (Reports, articles and non-contemporaneous documents).
203	Photograph	1977	Photograph depicting LENG Sim Hak	E190.1.160 P 00513449- 00513449	Photograph from Lao News Agency Photo Archive via Martin Rathie depicting LENG Sim Hak alias Sei at nursery in Laos.	S-21 Security Centre [108:415 to 475], D. IENG THIRITH [304:1201 to 1298], Roles and Functions [305:1207 to 1226]	This photograph cannot be accepted at face value as being authentic without, at a minimum, adducing evidence from the photographer. The photograph is unreliable and unsuitable to prove facts it purports to prove, and it is inadmissible pursuant to Rule 87(3)(c). Further, the photographer is not presently scheduled to testify in Case 002/01. Because Mr. IENG Sary has not been afforded his absolute right under Rule 84(1) to confront the photographer, this document is also inadmissible pursuant to Rule 87(3)(d). For further argument, <i>see</i> IENG Sary's Objections to the Admissibility of Certain Categories of Documents, 6 September 2011, E114, para. 1 (Standards for the admission of documentary evidence set by the Establishment Law), 7-9 (Reliability), 11 (Relevance), 18-19 (Reports, articles and non-contemporaneous documents).
204	Photograph	1977	Photograph depicting LENG Sim Hak	E190.1.161 P 00513446- 00513446	Photograph from Lao News Agency Photo Archive via Martin Rathie depicting LENG Sim Hak alias Sei arriving in Laos leading Democratic Kampuchea Women's Association delegation.	S-21 Security Centre [108:415 to 475], D. IENG THIRITH [304:1201 to 1298], Roles and Functions [305:1207 to 1226]	This photograph cannot be accepted at face value as being authentic without, at a minimum, adducing evidence from the photographer. The photograph is unreliable and unsuitable to prove facts it purports to prove, and it is inadmissible pursuant to Rule 87(3)(c). Further, the photographer is not presently scheduled to testify in Case 002/01. Because Mr. IENG Sary has not been afforded his absolute right under Rule 84(1) to confront the photographer, this document is also inadmissible pursuant to Rule 87(3)(d). For further argument, <i>see</i> IENG Sary's Objections to the Admissibility of Certain Categories of Documents, 6 September 2011, E114, para. 1 (Standards for the admission of documentary evidence set by the Establishment Law), 7-9 (Reliability), 11 (Relevance), 18-19 (Reports, articles and non-contemporaneous documents).

205	Photograph	1977	Photograph depicting LENG Sim Hak alias Sei at S-21	E190.1.163 P 00004774- 00004774	Photograph from S-21 depicting LENG Sim Hak alias Sei alias Sei, Head of Po-17 and Ministry of Social Affairs Committee Member, at the time of her arrest.	"Purges" [52:192 to 204], S-21 Security Centre [108:415 to 475], Arrests and detentions [110:423 to 472], Composition of the Incarcerated Population [110:423 to 1298], Roles and Functions [305:1207 to 1226], Participation in the Common Purpose [309:1227to1295], Security Centres and Execution Sites [313:1247 to 1287], Links to S-21 through the Ministry of Social Affairs [318:1273 to 1287]	This photograph cannot be accepted at face value as being authentic without, at a minimum, adducing evidence from the photographer. The photograph is unreliable and unsuitable to prove facts it purports to prove, and it is inadmissible pursuant to Rule 87(3)(c). Further, the photographer is not presently scheduled to testify in Case 002/01. Because Mr. IENG Sary has not been afforded his absolute right under Rule 84(1) to confront the photographer, this document is also inadmissible pursuant to Rule 87(3)(d). For further argument, <i>see</i> IENG Sary's Objections to the Admissibility of Certain Categories of Documents, 6 September 2011, E114, para. 1 (Standards for the admission of documentary evidence set by the Establishment Law), 7-9 (Reliability), 11 (Relevance), 18-19 (Reports, articles and non-contemporaneous documents).
206	Photograph	1977	Photograph depicting LENG Sim Hak and KHAMPHENG	E190.1.164 P 00513469- 00513469	Photograph from Lao News Agency Photo Archive via Martin Rathie depicting LENG Sim Hak alias Sei with Khampheng in Laos.	S-21 Security Centre [108:415 to 475], D. IENG THIRITH [304:1201 to 1298], Roles and Functions [305:1207 to 1226]	This photograph cannot be accepted at face value as being authentic without, at a minimum, adducing evidence from the photographer. The photograph is unreliable and unsuitable to prove facts it purports to prove, and it is inadmissible pursuant to Rule 87(3)(c). Further, the photographer is not presently scheduled to testify in Case 002/01. Because Mr. IENG Sary has not been afforded his absolute right under Rule 84(1) to confront the photographer, this document is also inadmissible pursuant to Rule 87(3)(d). For further argument, <i>see</i> IENG Sary's Objections to the Admissibility of Certain Categories of Documents, 6 September 2011, E114, para. 1 (Standards for the admission of documentary evidence set by the Establishment Law), 7-9 (Reliability), 11 (Relevance), 18-19 (Reports, articles and non-contemporaneous documents).
207	Photograph	1977	Photograph depicting LENG Sim Hak and MEAK Touch alias Kaem	E190.1.165 P 00513479- 00513479	Photograph from Lao News Agency Photo Archive via Martin Rathie depicting LENG Sim Hak alias Sei and MEAS Touch during a mission in Laos.	S-21 Security Centre [108:415 to 475], D. IENG THIRITH [304:1201 to 1298], Roles and Functions [305:1207 to 1226]	This photograph cannot be accepted at face value as being authentic without, at a minimum, adducing evidence from the photographer. The photograph is unreliable and unsuitable to prove facts it purports to prove, and it is inadmissible pursuant to Rule 87(3)(c). Further, the photographer is not presently scheduled to testify in Case 002/01. Because Mr. IENG Sary has not been afforded his absolute right under Rule 84(1) to confront the photographer, this document is also inadmissible pursuant to Rule 87(3)(d). For further argument, <i>see</i> IENG Sary's Objections to the Admissibility of Certain Categories of Documents, 6 September 2011, E114, para. 1 (Standards for the admission of documentary evidence set by the Establishment Law), 7-9 (Reliability), 11 (Relevance), 18-19 (Reports, articles and non-contemporaneous documents).

208	Photograph	1977	Photograph depicting LENG Sim Hak, BO Ven, LENG Sei, YOUK Koler and SO Se	E190.1.166 P 00513478-00513478	Photograph from Lao News Agency Photo Archive via Martin Rathie depicting LENG Sim Hak alias Sei, BO Ven, SO Se and YOUK Koler applauding performers during a mission to Laos.	S-21 Security Centre [108:415 to 475], D. IENG THIRITH [304:1201 to 1298], Roles and Functions [305:1207 to 1226]	This photograph cannot be accepted at face value as being authentic without, at a minimum, adducing evidence from the photographer. The photograph is unreliable and unsuitable to prove facts it purports to prove, and it is inadmissible pursuant to Rule 87(3)(c). Further, the photographer is not presently scheduled to testify in Case 002/01. Because Mr. IENG Sary has not been afforded his absolute right under Rule 84(1) to confront the photographer, this document is also inadmissible pursuant to Rule 87(3)(d). For further argument, <i>see</i> IENG Sary's Objections to the Admissibility of Certain Categories of Documents, 6 September 2011, E114, para. 1 (Standards for the admission of documentary evidence set by the Establishment Law), 7-9 (Reliability), 11 (Relevance), 18-19 (Reports, articles and non-contemporaneous documents).
209	Photograph	1977	Photograph depicting LENG Sim Hak, BO Ven, MEAK Touch alias Kaem, SINGKAPO, KOU, KHEMPHET and YOUK Koler	E190.1.167 P 00513477-00513477	Photograph from Lao News Agency Photo Archive via Martin Rathie depicting LENG Sim Hak alias Sei, BO Ven, MEAS Touch alias Kaem, Sing Kapo, Kou KHEMPHET Phonsena and YOUK Koler.	S-21 Security Centre [108:415 to 475], D. IENG THIRITH [304:1201 to 1298], Roles and Functions [305:1207 to 1226]	This photograph cannot be accepted at face value as being authentic without, at a minimum, adducing evidence from the photographer. The photograph is unreliable and unsuitable to prove facts it purports to prove, and it is inadmissible pursuant to Rule 87(3)(c). Further, the photographer is not presently scheduled to testify in Case 002/01. Because Mr. IENG Sary has not been afforded his absolute right under Rule 84(1) to confront the photographer, this document is also inadmissible pursuant to Rule 87(3)(d). For further argument, <i>see</i> IENG Sary's Objections to the Admissibility of Certain Categories of Documents, 6 September 2011, E114, para. 1 (Standards for the admission of documentary evidence set by the Establishment Law), 7-9 (Reliability), 11 (Relevance), 18-19 (Reports, articles and non-contemporaneous documents).
210	Photograph	1977	Photograph depicting LENG Sim Hak, KHAMPHENG, BO VEN and KHAMSOUK	E190.1.168 P 00513480-00513480	Photograph from Lao News Agency Photo Archive via Martin Rathie depicting LENG Sim Hak alias Sei and KHAMPHANG Boupha during a mission to Laos.	S-21 Security Centre [108:415 to 475], D. IENG THIRITH [304:1201 to 1298], Roles and Functions [305:1207 to 1226]	This photograph cannot be accepted at face value as being authentic without, at a minimum, adducing evidence from the photographer. The photograph is unreliable and unsuitable to prove facts it purports to prove, and it is inadmissible pursuant to Rule 87(3)(c). Further, the photographer is not presently scheduled to testify in Case 002/01. Because Mr. IENG Sary has not been afforded his absolute right under Rule 84(1) to confront the photographer, this document is also inadmissible pursuant to Rule 87(3)(d). For further argument, <i>see</i> IENG Sary's Objections to the Admissibility of Certain Categories of Documents, 6 September 2011, E114, para. 1 (Standards for the admission of documentary evidence set by the Establishment Law), 7-9 (Reliability), 11 (Relevance), 18-19 (Reports, articles and non-contemporaneous documents).

211	Photograph	1977	Photograph depicting LENG Sim Hak, KHAMSOUK VONGVICHIT, YOUK Koler and SANAN	E190.1.169 P 00513481-00513481	Photograph from Lao News Agency Photo Archive via Martin Rathie depicting LENG Sim Hak alias Sei, Khamsouk, VONG Vichit, YOUK Koler and Sanan during a mission to Laos.	S-21 Security Centre [108:415 to 475], D. IENG THIRITH [304:1201 to 1298], Roles and Functions [305:1207 to 1226]	This photograph cannot be accepted at face value as being authentic without, at a minimum, adducing evidence from the photographer. The photograph is unreliable and unsuitable to prove facts it purports to prove, and it is inadmissible pursuant to Rule 87(3)(c). Further, the photographer is not presently scheduled to testify in Case 002/01. Because Mr. IENG Sary has not been afforded his absolute right under Rule 84(1) to confront the photographer, this document is also inadmissible pursuant to Rule 87(3)(d). For further argument, <i>see</i> IENG Sary's Objections to the Admissibility of Certain Categories of Documents, 6 September 2011, E114, para. 1 (Standards for the admission of documentary evidence set by the Establishment Law), 7-9 (Reliability), 11 (Relevance), 18-19 (Reports, articles and non-contemporaneous documents).
212	Photograph	1977	Photograph depicting LENG Sim Hak, KHAMSOUK, NOUHAK, MEAK Touch alias Kaem, BO Ven, KHAMPHENG, YOUK Koler and KHAMPHON PHIMMASENG	E190.1.170 P 00513482-00513482	Photograph from Lao News Agency Photo Archive via Martin Rathie depicting LENG Sim Hak alias Sei, KHAMSOUK, Nouhak, MEAS Touch alias Kaem, BO Ven, KHAMPHANG Bouphe, YOUK Koler, and KHAMPHON Phimmaseng during a mission to Laos.	S-21 Security Centre [108:415 to 475], D. IENG THIRITH [304:1201 to 1298], Roles and Functions [305:1207 to 1226]	This photograph cannot be accepted at face value as being authentic without, at a minimum, adducing evidence from the photographer. The photograph is unreliable and unsuitable to prove facts it purports to prove, and it is inadmissible pursuant to Rule 87(3)(c). Further, the photographer is not presently scheduled to testify in Case 002/01. Because Mr. IENG Sary has not been afforded his absolute right under Rule 84(1) to confront the photographer, this document is also inadmissible pursuant to Rule 87(3)(d). For further argument, <i>see</i> IENG Sary's Objections to the Admissibility of Certain Categories of Documents, 6 September 2011, E114, para. 1 (Standards for the admission of documentary evidence set by the Establishment Law), 7-9 (Reliability), 11 (Relevance), 18-19 (Reports, articles and non-contemporaneous documents).
213	Photograph	1977	Photograph depicting LENG Sim Hak, NOUHAK and MEAK Touch alias Kaem	E190.1.171 P 00513466-00513466	Photograph from Lao News Agency Photo Archive via Martin Rathie depicting LENG Sim Hak alias Sei toasting with Lao leader Nouhak and MEAS Touch alias Kaem during a mission to Laos.	S-21 Security Centre [108:415 to 475], D. IENG THIRITH [304:1201 to 1298], Roles and Functions [305:1207 to 1226]	This photograph cannot be accepted at face value as being authentic without, at a minimum, adducing evidence from the photographer. The photograph is unreliable and unsuitable to prove facts it purports to prove, and it is inadmissible pursuant to Rule 87(3)(c). Further, the photographer is not presently scheduled to testify in Case 002/01. Because Mr. IENG Sary has not been afforded his absolute right under Rule 84(1) to confront the photographer, this document is also inadmissible pursuant to Rule 87(3)(d). For further argument, <i>see</i> IENG Sary's Objections to the Admissibility of Certain Categories of Documents, 6 September 2011, E114, para. 1 (Standards for the admission of documentary evidence set by the Establishment Law), 7-9 (Reliability), 11 (Relevance), 18-19 (Reports, articles and non-contemporaneous documents).

214	Photograph	1977	Photograph depicting MAHA KHAMPHAN and KHIEU Samphan	E190.1.172 P 00513487-00513487	Photograph from Lao News Agency Photo Archive via Martin Rathie depicting Laotian leader Maha KHAM Phan chatting with KHIEU Samphan alias Haem.	C. KHIEU SAMPHAN [284:1126 to 1200], Roles and Functions [286:1131 to 1152]	This photograph cannot be accepted at face value as being authentic without, at a minimum, adducing evidence from the photographer. The photograph is unreliable and unsuitable to prove facts it purports to prove, and it is inadmissible pursuant to Rule 87(3)(c). Further, the photographer is not presently scheduled to testify in Case 002/01. Because Mr. IENG Sary has not been afforded his absolute right under Rule 84(1) to confront the photographer, this document is also inadmissible pursuant to Rule 87(3)(d). For further argument, <i>see</i> IENG Sary's Objections to the Admissibility of Certain Categories of Documents, 6 September 2011, E114, para. 1 (Standards for the admission of documentary evidence set by the Establishment Law), 7-9 (Reliability), 11 (Relevance), 18-19 (Reports, articles and non-contemporaneous documents).
215	Photograph	1977	Photograph depicting MAHA KHAMPHAN, IENG Sary and KHIEU Samphan	E190.1.173 P 00513489-00513489	Photograph from Lao News Agency Photo Archive via Martin Rathie depicting Maha Khamphan toasting with IENG Sary alias Van and KHIEU Samphan alias Haem.	B. IENG SARY [250:994 to 1125], Roles and Functions [251:1001 to 1017], C. KHIEU SAMPHAN [284:1126 to 1200], Roles and Functions [286:1131 to 1152]	This photograph cannot be accepted at face value as being authentic without, at a minimum, adducing evidence from the photographer. The photograph is unreliable and unsuitable to prove facts it purports to prove, and it is inadmissible pursuant to Rule 87(3)(c). Further, the photographer is not presently scheduled to testify in Case 002/01. Because Mr. IENG Sary has not been afforded his absolute right under Rule 84(1) to confront the photographer, this document is also inadmissible pursuant to Rule 87(3)(d). For further argument, <i>see</i> IENG Sary's Objections to the Admissibility of Certain Categories of Documents, 6 September 2011, E114, para. 1 (Standards for the admission of documentary evidence set by the Establishment Law), 7-9 (Reliability), 11 (Relevance), 18-19 (Reports, articles and non-contemporaneous documents).
216	Photograph	1977	Photograph depicting NOUHAK and KHIEU Samphan	E190.1.174 P 00513499-00513499	Photograph from Lao News Agency Photo Archive via Martin Rathie depicting Laotian leader Nouhak with KHIEU Samphan alias Haem.	C. KHIEU SAMPHAN [284:1126 to 1200], Roles and Functions [286:1131 to 1152]	This photograph cannot be accepted at face value as being authentic without, at a minimum, adducing evidence from the photographer. The photograph is unreliable and unsuitable to prove facts it purports to prove, and it is inadmissible pursuant to Rule 87(3)(c). Further, the photographer is not presently scheduled to testify in Case 002/01. Because Mr. IENG Sary has not been afforded his absolute right under Rule 84(1) to confront the photographer, this document is also inadmissible pursuant to Rule 87(3)(d). For further argument, <i>see</i> IENG Sary's Objections to the Admissibility of Certain Categories of Documents, 6 September 2011, E114, para. 1 (Standards for the admission of documentary evidence set by the Establishment Law), 7-9 (Reliability), 11 (Relevance), 18-19 (Reports, articles and non-contemporaneous documents).

217	Photograph	1977	Photograph depicting NOUHAK, SITHON, KHIEU Samphan, IENG Sary and IENG Thirith	E190.1.175 P 00513500-00513500	Photograph from Lao News Agency Photo Archive via Martin Rathie depicting Laotian leaders Nouhak and Sithon with KHIEU Samphan alias Haem, IENG Sary alias Van and IENG Thirith alias Phea.	B. IENG SARY [250:994 to 1125], Roles and Functions [251:1001 to 1017], C. KHIEU SAMPHAN [284:1126 to 1200], Roles and Functions [286:1131 to 1152], D. IENG THIRITH [304:1201 to 1298], Roles and Functions [305:1207 to 1226]	This photograph cannot be accepted at face value as being authentic without, at a minimum, adducing evidence from the photographer. The photograph is unreliable and unsuitable to prove facts it purports to prove, and it is inadmissible pursuant to Rule 87(3)(c). Further, the photographer is not presently scheduled to testify in Case 002/01. Because Mr. IENG Sary has not been afforded his absolute right under Rule 84(1) to confront the photographer, this document is also inadmissible pursuant to Rule 87(3)(d). For further argument, <i>see</i> IENG Sary's Objections to the Admissibility of Certain Categories of Documents, 6 September 2011, E114, para. 1 (Standards for the admission of documentary evidence set by the Establishment Law), 7-9 (Reliability), 11 (Relevance), 18-19 (Reports, articles and non-contemporaneous documents).
218	Photograph	1977	Photograph depicting NUON Chea, KHIEU Samphan, Souphanouvong and Phoune	E190.1.176 P 00513494-00513494	Photograph from Lao News Agency Photo Archive via Martin Rathie depicting NUON Chea and KHIEU Samphan alias Haem welcoming Laotian leaders Souphanouvong and Phoune.	A. NUON CHEA [214:862 to 993], Roles and Functions [215:869 to 894], C. KHIEU SAMPHAN [284:1126 to 1200], Roles and Functions [286:1131 to 1152]	This photograph cannot be accepted at face value as being authentic without, at a minimum, adducing evidence from the photographer. The photograph is unreliable and unsuitable to prove facts it purports to prove, and it is inadmissible pursuant to Rule 87(3)(c). Further, the photographer is not presently scheduled to testify in Case 002/01. Because Mr. IENG Sary has not been afforded his absolute right under Rule 84(1) to confront the photographer, this document is also inadmissible pursuant to Rule 87(3)(d). For further argument, <i>see</i> IENG Sary's Objections to the Admissibility of Certain Categories of Documents, 6 September 2011, E114, para. 1 (Standards for the admission of documentary evidence set by the Establishment Law), 7-9 (Reliability), 11 (Relevance), 18-19 (Reports, articles and non-contemporaneous documents).
219	Photograph	1977	Photograph depicting Phoune and IENG Sary	E190.1.177 P 00513508-00513508	Photograph from Lao News Agency Photo Archive via Martin Rathie depicting IENG Sary conferring with Laotian leader Phoune.	B. IENG SARY [250:994 to 1125], Roles and Functions [251:1001 to 1017]	This photograph cannot be accepted at face value as being authentic without, at a minimum, adducing evidence from the photographer. The photograph is unreliable and unsuitable to prove facts it purports to prove, and it is inadmissible pursuant to Rule 87(3)(c). Further, the photographer is not presently scheduled to testify in Case 002/01. Because Mr. IENG Sary has not been afforded his absolute right under Rule 84(1) to confront the photographer, this document is also inadmissible pursuant to Rule 87(3)(d). For further argument, <i>see</i> IENG Sary's Objections to the Admissibility of Certain Categories of Documents, 6 September 2011, E114, para. 1 (Standards for the admission of documentary evidence set by the Establishment Law), 7-9 (Reliability), 11 (Relevance), 18-19 (Reports, articles and non-contemporaneous documents).

220	Photograph	1977	Photograph depicting Phoune, Souphanouvong, THHOUN Prasith, KHIEU Samphan and NUON Chea	E190.1.178 P 00513511-00513511	Photograph from Lao News Agency Photo Archive via Martin Rathie depicting Laotian leaders Phoune and Souphanouvong with THIOUNN Prasith alias San, KHIEU Samphan alias Haem and NUON Chea.	A. NUON CHEA [214:862 to 993], Roles and Functions [215:869 to 894], C. KHIEU SAMPHAN [284:1126 to 1200], Roles and Functions [286:1131 to 1152]	This photograph cannot be accepted at face value as being authentic without, at a minimum, adducing evidence from the photographer. The photograph is unreliable and unsuitable to prove facts it purports to prove, and it is inadmissible pursuant to Rule 87(3)(c). Further, the photographer is not presently scheduled to testify in Case 002/01. Because Mr. IENG Sary has not been afforded his absolute right under Rule 84(1) to confront the photographer, this document is also inadmissible pursuant to Rule 87(3)(d). For further argument, <i>see</i> IENG Sary's Objections to the Admissibility of Certain Categories of Documents, 6 September 2011, E114, para. 1 (Standards for the admission of documentary evidence set by the Establishment Law), 7-9 (Reliability), 11 (Relevance), 18-19 (Reports, articles and non-contemporaneous documents).
221	Photograph	1977	Photograph depicting POL Pot, NUON Chea, IENG Sary, VON Vet and Sophanouvong	E190.1.179 P 00513522-00513522	Photograph from Lao News Agency Photo Archive via Martin Rathie depicting SALOTH Sar alias POL Pot, NUON Chea, IENG Sary alias Van and PENH Thuok alias VON Vet shaking hands with Lao President Sophanouvong.	A. NUON CHEA [214:862 to 993], Roles and Functions [215:869 to 894], B. IENG SARY [250:994 to 1125], Roles and Functions [251:1001 to 1017]	This photograph cannot be accepted at face value as being authentic without, at a minimum, adducing evidence from the photographer. The photograph is unreliable and unsuitable to prove facts it purports to prove, and it is inadmissible pursuant to Rule 87(3)(c). Further, the photographer is not presently scheduled to testify in Case 002/01. Because Mr. IENG Sary has not been afforded his absolute right under Rule 84(1) to confront the photographer, this document is also inadmissible pursuant to Rule 87(3)(d). For further argument, <i>see</i> IENG Sary's Objections to the Admissibility of Certain Categories of Documents, 6 September 2011, E114, para. 1 (Standards for the admission of documentary evidence set by the Establishment Law), 7-9 (Reliability), 11 (Relevance), 18-19 (Reports, articles and non-contemporaneous documents).
222	Photograph	1977	Photograph depicting SISANA, Phoune and IENG Sary	E190.1.180 P 00513569-00513569	Photograph from Lao News Agency Photo Archive via Martin Rathie depicting IENG Sary alias Van conferring with Laotian leaders Sisana and Phoune.	B. IENG SARY [250:994 to 1125], Roles and Functions [251:1001 to 1017]	This photograph cannot be accepted at face value as being authentic without, at a minimum, adducing evidence from the photographer. The photograph is unreliable and unsuitable to prove facts it purports to prove, and it is inadmissible pursuant to Rule 87(3)(c). Further, the photographer is not presently scheduled to testify in Case 002/01. Because Mr. IENG Sary has not been afforded his absolute right under Rule 84(1) to confront the photographer, this document is also inadmissible pursuant to Rule 87(3)(d). For further argument, <i>see</i> IENG Sary's Objections to the Admissibility of Certain Categories of Documents, 6 September 2011, E114, para. 1 (Standards for the admission of documentary evidence set by the Establishment Law), 7-9 (Reliability), 11 (Relevance), 18-19 (Reports, articles and non-contemporaneous documents).

223	Photograph	1977	Photograph depicting Sisavath and KHIEU Samphan	E190.1.181 P 00513574- 00513574	Photograph from Lao News Agency Photo Archive via Martin Rathie depicting Laotian leader Sisavath toasting KHIEU Samphan alias Haem.	C. KHIEU SAMPHAN [284:1126 to 1200], Roles and Functions [286:1131 to 1152]	This photograph cannot be accepted at face value as being authentic without, at a minimum, adducing evidence from the photographer. The photograph is unreliable and unsuitable to prove facts it purports to prove, and it is inadmissible pursuant to Rule 87(3)(c). Further, the photographer is not presently scheduled to testify in Case 002/01. Because Mr. IENG Sary has not been afforded his absolute right under Rule 84(1) to confront the photographer, this document is also inadmissible pursuant to Rule 87(3)(d). For further argument, <i>see</i> IENG Sary's Objections to the Admissibility of Certain Categories of Documents, 6 September 2011, E114, para. 1 (Standards for the admission of documentary evidence set by the Establishment Law), 7-9 (Reliability), 11 (Relevance), 18-19 (Reports, articles and non-contemporaneous documents).
224	Photograph	1977	Photograph depicting SITHON, NOUHAK, IENG Sary and KHIEU Samphan	E190.1.182 P 00513578- 00513578	Photograph from Lao News Agency Photo Archive via Martin Rathie depicting KHIEU Samphan alias Haem and IENG Sary alias Van greeting Laotian leaders Sithon and Nouhak.	B. IENG SARY [250:994 to 1125], Roles and Functions [251:1001 to 1017], C. KHIEU SAMPHAN [284:1126 to 1200], Roles and Functions [286:1131 to 1152]	This photograph cannot be accepted at face value as being authentic without, at a minimum, adducing evidence from the photographer. The photograph is unreliable and unsuitable to prove facts it purports to prove, and it is inadmissible pursuant to Rule 87(3)(c). Further, the photographer is not presently scheduled to testify in Case 002/01. Because Mr. IENG Sary has not been afforded his absolute right under Rule 84(1) to confront the photographer, this document is also inadmissible pursuant to Rule 87(3)(d). For further argument, <i>see</i> IENG Sary's Objections to the Admissibility of Certain Categories of Documents, 6 September 2011, E114, para. 1 (Standards for the admission of documentary evidence set by the Establishment Law), 7-9 (Reliability), 11 (Relevance), 18-19 (Reports, articles and non-contemporaneous documents).
225	Photograph	1977	Photograph depicting Souphanouvong and KHIEU Samphan	E190.1.185 P 00513587- 00513587	Photograph from Lao News Agency Photo Archive via Martin Rathie depicting Laotian President Souphanouvong and KHIEU Samphan alias Haem.	C. KHIEU SAMPHAN [284:1126 to 1200], Roles and Functions [286:1131 to 1152]	This photograph cannot be accepted at face value as being authentic without, at a minimum, adducing evidence from the photographer. The photograph is unreliable and unsuitable to prove facts it purports to prove, and it is inadmissible pursuant to Rule 87(3)(c). Further, the photographer is not presently scheduled to testify in Case 002/01. Because Mr. IENG Sary has not been afforded his absolute right under Rule 84(1) to confront the photographer, this document is also inadmissible pursuant to Rule 87(3)(d). For further argument, <i>see</i> IENG Sary's Objections to the Admissibility of Certain Categories of Documents, 6 September 2011, E114, para. 1 (Standards for the admission of documentary evidence set by the Establishment Law), 7-9 (Reliability), 11 (Relevance), 18-19 (Reports, articles and non-contemporaneous documents).

226	Photograph	1977	Photograph depicting Souphanouvong and KHIEU Samphan	E190.1.186 P 00513589- 00513589	Photograph from Lao News Agency Photo Archive via Martin Rathie depicting Laotian President Souphanouvong and KHIEU Samphan alias Haem at the beach.	C. KHIEU SAMPHAN [284:1126 to 1200], Roles and Functions [286:1131 to 1152]	This photograph cannot be accepted at face value as being authentic without, at a minimum, adducing evidence from the photographer. The photograph is unreliable and unsuitable to prove facts it purports to prove, and it is inadmissible pursuant to Rule 87(3)(c). Further, the photographer is not presently scheduled to testify in Case 002/01. Because Mr. IENG Sary has not been afforded his absolute right under Rule 84(1) to confront the photographer, this document is also inadmissible pursuant to Rule 87(3)(d). For further argument, <i>see</i> IENG Sary's Objections to the Admissibility of Certain Categories of Documents, 6 September 2011, E114, para. 1 (Standards for the admission of documentary evidence set by the Establishment Law), 7-9 (Reliability), 11 (Relevance), 18-19 (Reports, articles and non-contemporaneous documents).
227	Photograph	1977	Photograph depicting Souphanouvong and KHIEU Samphan	E190.1.184 P 00513591- 00513591	Photograph from Lao News Agency Photo Archive via Martin Rathie depicting Laotian President Souphanouvong and KHIEU Samphan alias Haem.	C. KHIEU SAMPHAN [284:1126 to 1200], Roles and Functions [286:1131 to 1152]	This photograph cannot be accepted at face value as being authentic without, at a minimum, adducing evidence from the photographer. The photograph is unreliable and unsuitable to prove facts it purports to prove, and it is inadmissible pursuant to Rule 87(3)(c). Further, the photographer is not presently scheduled to testify in Case 002/01. Because Mr. IENG Sary has not been afforded his absolute right under Rule 84(1) to confront the photographer, this document is also inadmissible pursuant to Rule 87(3)(d). For further argument, <i>see</i> IENG Sary's Objections to the Admissibility of Certain Categories of Documents, 6 September 2011, E114, para. 1 (Standards for the admission of documentary evidence set by the Establishment Law), 7-9 (Reliability), 11 (Relevance), 18-19 (Reports, articles and non-contemporaneous documents).
228	Photograph	1977	Photograph depicting Souphanouvong and KHIEU Samphan	E190.1.183 P 00513609- 00513609	Photograph from Lao News Agency Photo Archive via Martin Rathie depicting Laotian President Souphanouvong being welcomed by KHIEU Samphan alias Haem.	C. KHIEU SAMPHAN [284:1126 to 1200], Roles and Functions [286:1131 to 1152]	This photograph cannot be accepted at face value as being authentic without, at a minimum, adducing evidence from the photographer. The photograph is unreliable and unsuitable to prove facts it purports to prove, and it is inadmissible pursuant to Rule 87(3)(c). Further, the photographer is not presently scheduled to testify in Case 002/01. Because Mr. IENG Sary has not been afforded his absolute right under Rule 84(1) to confront the photographer, this document is also inadmissible pursuant to Rule 87(3)(d). For further argument, <i>see</i> IENG Sary's Objections to the Admissibility of Certain Categories of Documents, 6 September 2011, E114, para. 1 (Standards for the admission of documentary evidence set by the Establishment Law), 7-9 (Reliability), 11 (Relevance), 18-19 (Reports, articles and non-contemporaneous documents).

229	Photograph	1977	Photograph depicting Souphanouvong and KHIEU Samphan	E190.1.187 P 00513605-00513605	Photograph from Lao News Agency Photo Archive via Martin Rathie depicting Laotian President Souphanouvong giving a speech in Phnom Penh with KHIEU Samphan alias Haem.	C. KHIEU SAMPHAN [284:1126 to 1200], Roles and Functions [286:1131 to 1152]	This photograph cannot be accepted at face value as being authentic without, at a minimum, adducing evidence from the photographer. The photograph is unreliable and unsuitable to prove facts it purports to prove, and it is inadmissible pursuant to Rule 87(3)(c). Further, the photographer is not presently scheduled to testify in Case 002/01. Because Mr. IENG Sary has not been afforded his absolute right under Rule 84(1) to confront the photographer, this document is also inadmissible pursuant to Rule 87(3)(d). For further argument, <i>see</i> IENG Sary's Objections to the Admissibility of Certain Categories of Documents, 6 September 2011, E114, para. 1 (Standards for the admission of documentary evidence set by the Establishment Law), 7-9 (Reliability), 11 (Relevance), 18-19 (Reports, articles and non-contemporaneous documents).
230	Photograph	1977	Photograph depicting Souphanouvong, KHIEU Samphan and IENG Sary	E190.1.188 P 00513610-00513610	Photograph from Lao News Agency Photo Archive via Martin Rathie depicting Lao President Souphanouvong observing a child welder with KHIEU Samphan alias Haem and IENG Sary alias Van.	B. IENG SARY [250:994 to 1125], Roles and Functions [251:1001 to 1017], C. KHIEU SAMPHAN [284:1126 to 1200], Roles and Functions [286:1131 to 1152]	This photograph cannot be accepted at face value as being authentic without, at a minimum, adducing evidence from the photographer. The photograph is unreliable and unsuitable to prove facts it purports to prove, and it is inadmissible pursuant to Rule 87(3)(c). Further, the photographer is not presently scheduled to testify in Case 002/01. Because Mr. IENG Sary has not been afforded his absolute right under Rule 84(1) to confront the photographer, this document is also inadmissible pursuant to Rule 87(3)(d). For further argument, <i>see</i> IENG Sary's Objections to the Admissibility of Certain Categories of Documents, 6 September 2011, E114, para. 1 (Standards for the admission of documentary evidence set by the Establishment Law), 7-9 (Reliability), 11 (Relevance), 18-19 (Reports, articles and non-contemporaneous documents).
231	Photograph	1977	Photograph depicting Souphanouvong, KHIEU Samphan and KHAM Phan	E190.1.189 P 00513611-00513611	Photograph from Lao News Agency Photo Archive via Martin Rathie depicting Laotian President Souphanouvong with KHIEU Samphan alias Haem and KHAMPHAN/ at the beach.	C. KHIEU SAMPHAN [284:1126 to 1200], Roles and Functions [286:1131 to 1152]	This photograph cannot be accepted at face value as being authentic without, at a minimum, adducing evidence from the photographer. The photograph is unreliable and unsuitable to prove facts it purports to prove, and it is inadmissible pursuant to Rule 87(3)(c). Further, the photographer is not presently scheduled to testify in Case 002/01. Because Mr. IENG Sary has not been afforded his absolute right under Rule 84(1) to confront the photographer, this document is also inadmissible pursuant to Rule 87(3)(d). For further argument, <i>see</i> IENG Sary's Objections to the Admissibility of Certain Categories of Documents, 6 September 2011, E114, para. 1 (Standards for the admission of documentary evidence set by the Establishment Law), 7-9 (Reliability), 11 (Relevance), 18-19 (Reports, articles and non-contemporaneous documents).

232	Photograph	1977	Photograph depicting Souphanouvong, KHIEU Samphan, IENG Sary and SO Hong	E190.1.190 P 00513592-00513592	Photograph from Lao News Agency Photo Archive via Martin Rathie depicting Laotian President Souphanouvong arriving at the theatre with KHIEU Samphan alias Haem, IENG Sary alias Van and SALOTH Ban alias SO Hong alias LOTH Nitya alias SA Lothya alias Bien alias Phat.	B. IENG SARY [250:994 to 1125], Roles and Functions [251:1001 to 1017], C. KHIEU SAMPHAN [284:1126 to 1200], Roles and Functions [286:1131 to 1152]	This photograph cannot be accepted at face value as being authentic without, at a minimum, adducing evidence from the photographer. The photograph is unreliable and unsuitable to prove facts it purports to prove, and it is inadmissible pursuant to Rule 87(3)(c). Further, the photographer is not presently scheduled to testify in Case 002/01. Because Mr. IENG Sary has not been afforded his absolute right under Rule 84(1) to confront the photographer, this document is also inadmissible pursuant to Rule 87(3)(d). For further argument, <i>see</i> IENG Sary's Objections to the Admissibility of Certain Categories of Documents, 6 September 2011, E114, para. 1 (Standards for the admission of documentary evidence set by the Establishment Law), 7-9 (Reliability), 11 (Relevance), 18-19 (Reports, articles and non-contemporaneous documents).
233	Photograph	1977	Photograph depicting Souphanouvong, KHIEU Samphan, IENG Sary and Y Chhien	E190.1.191 P 00513593-00513593	Photograph from Lao News Agency Photo Archive via Martin Rathie depicting Lao President Souphanouvong at airport with KHIEU Samphan alias Haem, IENG Sary alias Van and Y Chhien.	B. IENG SARY [250:994 to 1125], Roles and Functions [251:1001 to 1017], C. KHIEU SAMPHAN [284:1126 to 1200], Roles and Functions [286:1131 to 1152]	This photograph cannot be accepted at face value as being authentic without, at a minimum, adducing evidence from the photographer. The photograph is unreliable and unsuitable to prove facts it purports to prove, and it is inadmissible pursuant to Rule 87(3)(c). Further, the photographer is not presently scheduled to testify in Case 002/01. Because Mr. IENG Sary has not been afforded his absolute right under Rule 84(1) to confront the photographer, this document is also inadmissible pursuant to Rule 87(3)(d). For further argument, <i>see</i> IENG Sary's Objections to the Admissibility of Certain Categories of Documents, 6 September 2011, E114, para. 1 (Standards for the admission of documentary evidence set by the Establishment Law), 7-9 (Reliability), 11 (Relevance), 18-19 (Reports, articles and non-contemporaneous documents).
234	Photograph	1977	Photograph depicting Souphanouvong, KHIEU Samphan, IENG Sary, IENG Thirith and YUN Yat	E190.1.192 P 00513604-00513604	Photograph from Lao News Agency Photo Archive via Martin Rathie depicting Laotian President Souphanouvong receiving a pennant from KHIEU Samphan alias Haem, IENG Sary alias Van, IENG Thirith alias Phea and YUN Yat alias At.	B. IENG SARY [250:994 to 1125], Roles and Functions [251:1001 to 1017], C. KHIEU SAMPHAN [284:1126 to 1200], Roles and Functions [286:1131 to 1152], D. IENG THIRITH [304:1201 to 1298], Roles and Functions [305:1207 to 1226]	This photograph cannot be accepted at face value as being authentic without, at a minimum, adducing evidence from the photographer. The photograph is unreliable and unsuitable to prove facts it purports to prove, and it is inadmissible pursuant to Rule 87(3)(c). Further, the photographer is not presently scheduled to testify in Case 002/01. Because Mr. IENG Sary has not been afforded his absolute right under Rule 84(1) to confront the photographer, this document is also inadmissible pursuant to Rule 87(3)(d). For further argument, <i>see</i> IENG Sary's Objections to the Admissibility of Certain Categories of Documents, 6 September 2011, E114, para. 1 (Standards for the admission of documentary evidence set by the Establishment Law), 7-9 (Reliability), 11 (Relevance), 18-19 (Reports, articles and non-contemporaneous documents).

235	Photograph	1977	Photograph depicting Souphanouvong, KHIEU Samphan, NUON Chea and VANN Rith	E190.1.193 P 00513600-00513600	Photograph from Lao News Agency Photo Archive via Martin Rathie depicting Lao President Souphanouvong meeting DK personnel including KHIEU Samphan alias Haem, NUON Chea and VAN Rith alias Reut.	B. IENG SARY [250:994 to 1125], Roles and Functions [251:1001 to 1017], C. KHIEU SAMPHAN [284:1126 to 1200], Roles and Functions [286:1131 to 1152]	This photograph cannot be accepted at face value as being authentic without, at a minimum, adducing evidence from the photographer. The photograph is unreliable and unsuitable to prove facts it purports to prove, and it is inadmissible pursuant to Rule 87(3)(c). Further, the photographer is not presently scheduled to testify in Case 002/01. Because Mr. IENG Sary has not been afforded his absolute right under Rule 84(1) to confront the photographer, this document is also inadmissible pursuant to Rule 87(3)(d). For further argument, <i>see</i> IENG Sary's Objections to the Admissibility of Certain Categories of Documents, 6 September 2011, E114, para. 1 (Standards for the admission of documentary evidence set by the Establishment Law), 7-9 (Reliability), 11 (Relevance), 18-19 (Reports, articles and non-contemporaneous documents).
236	Photograph	1977	Photograph depicting Souphanouvong, KHIEU Samphan, NUON Chea, IENG Sary, So Hong and Phoune	E190.1.194 P 00513612-00513612	Photograph from Lao News Agency Photo Archive via Martin Rathie depicting KHIEU Samphan alias Haem, NUON Chea, IENG Sary alias Van and SALOTH Ban alias SO Hong alias LOTH Nitya alias SA Lothya alias Bien alias Phat greeting Laotian leaders Souphanouvong and Phoune.	B. IENG SARY [250:994 to 1125], Roles and Functions [251:1001 to 1017], C. KHIEU SAMPHAN [284:1126 to 1200], Roles and Functions [286:1131 to 1152]	This photograph cannot be accepted at face value as being authentic without, at a minimum, adducing evidence from the photographer. The photograph is unreliable and unsuitable to prove facts it purports to prove, and it is inadmissible pursuant to Rule 87(3)(c). Further, the photographer is not presently scheduled to testify in Case 002/01. Because Mr. IENG Sary has not been afforded his absolute right under Rule 84(1) to confront the photographer, this document is also inadmissible pursuant to Rule 87(3)(d). For further argument, <i>see</i> IENG Sary's Objections to the Admissibility of Certain Categories of Documents, 6 September 2011, E114, para. 1 (Standards for the admission of documentary evidence set by the Establishment Law), 7-9 (Reliability), 11 (Relevance), 18-19 (Reports, articles and non-contemporaneous documents).
237	Photograph	1977	Photograph depicting THHION Prasith, KHIEU Samphan and NUON Chea	E190.1.195 P 00513537-00513537	Photograph from Lao News Agency Photo Archive via Martin Rathie depicting NUON Chea and KHIEU Samphan alias Haem introducing the diplomatic corps to Laotian President Souphanouvong.	C. KHIEU SAMPHAN [284:1126 to 1200], Roles and Functions [286:1131 to 1152]	This photograph cannot be accepted at face value as being authentic without, at a minimum, adducing evidence from the photographer. The photograph is unreliable and unsuitable to prove facts it purports to prove, and it is inadmissible pursuant to Rule 87(3)(c). Further, the photographer is not presently scheduled to testify in Case 002/01. Because Mr. IENG Sary has not been afforded his absolute right under Rule 84(1) to confront the photographer, this document is also inadmissible pursuant to Rule 87(3)(d). For further argument, <i>see</i> IENG Sary's Objections to the Admissibility of Certain Categories of Documents, 6 September 2011, E114, para. 1 (Standards for the admission of documentary evidence set by the Establishment Law), 7-9 (Reliability), 11 (Relevance), 18-19 (Reports, articles and non-contemporaneous documents).

238	Photograph	> 07 January 1979	Photograph depicting an exhumed mass grave	E190.1.198 P 00407228-00407228	Photograph from Tuol Sleng Museum depicting an exhumed mass grave.	VII. FACTUAL FINDINGS OF JOINT CRIMINAL ENTERPRISE [41:156 to 220], C. SECURITY CENTRES AND EXECUTION SITES [47:178 to 204], Widespread or Systematic [335:1352to1361]	This photograph cannot be accepted at face value as being authentic without, at a minimum, adducing evidence from the photographer. The photograph is unreliable and unsuitable to prove facts it purports to prove, and it is inadmissible pursuant to Rule 87(3)(c). Further, the photographer is not presently scheduled to testify in Case 002/01. Because Mr. IENG Sary has not been afforded his absolute right under Rule 84(1) to confront the photographer, this document is also inadmissible pursuant to Rule 87(3)(d). For further argument, <i>see</i> IENG Sary's Objections to the Admissibility of Certain Categories of Documents, 6 September 2011, E114, para. 1 (Standards for the admission of documentary evidence set by the Establishment Law), 7-9 (Reliability), 11 (Relevance), 18-19 (Reports, articles and non-contemporaneous documents).
239	Photograph	> 07 January 1979	Photograph depicting an exhumed mass grave	E190.1.197 P 00407262-00407262	Photograph from Tuol Sleng Museum depicting an exhumed mass grave.	VII. FACTUAL FINDINGS OF JOINT CRIMINAL ENTERPRISE [41:156 to 220], C. SECURITY CENTRES AND EXECUTION SITES [47:178 to 204], Widespread or Systematic [335:1352to1361]	This photograph cannot be accepted at face value as being authentic without, at a minimum, adducing evidence from the photographer. The photograph is unreliable and unsuitable to prove facts it purports to prove, and it is inadmissible pursuant to Rule 87(3)(c). Further, the photographer is not presently scheduled to testify in Case 002/01. Because Mr. IENG Sary has not been afforded his absolute right under Rule 84(1) to confront the photographer, this document is also inadmissible pursuant to Rule 87(3)(d). For further argument, <i>see</i> IENG Sary's Objections to the Admissibility of Certain Categories of Documents, 6 September 2011, E114, para. 1 (Standards for the admission of documentary evidence set by the Establishment Law), 7-9 (Reliability), 11 (Relevance), 18-19 (Reports, articles and non-contemporaneous documents).
240	Photograph	> 07 January 1979	Photograph depicting an exhumed mass grave	E190.1.196 P 00407229-00407229	Photograph from Tuol Sleng Museum depicting an exhumed mass grave.	VII. FACTUAL FINDINGS OF JOINT CRIMINAL ENTERPRISE [41:156 to 220], C. SECURITY CENTRES AND EXECUTION SITES [47:178 to 204], Widespread or Systematic [335:1352to1361]	This photograph cannot be accepted at face value as being authentic without, at a minimum, adducing evidence from the photographer. The photograph is unreliable and unsuitable to prove facts it purports to prove, and it is inadmissible pursuant to Rule 87(3)(c). Further, the photographer is not presently scheduled to testify in Case 002/01. Because Mr. IENG Sary has not been afforded his absolute right under Rule 84(1) to confront the photographer, this document is also inadmissible pursuant to Rule 87(3)(d). For further argument, <i>see</i> IENG Sary's Objections to the Admissibility of Certain Categories of Documents, 6 September 2011, E114, para. 1 (Standards for the admission of documentary evidence set by the Establishment Law), 7-9 (Reliability), 11 (Relevance), 18-19 (Reports, articles and non-contemporaneous documents).

241	Photograph	> 07 January 1979	Photograph depicting exhumation of mass grave	E190.1.199 P 00407126-00407126	Photograph from Tuol Sleng Museum depicting local villagers in the process of exhuming a mass grave.	VII. FACTUAL FINDINGS OF JOINT CRIMINAL ENTERPRISE [41:156 to 220], C. SECURITY CENTRES AND EXECUTION SITES [47:178 to 204], Widespread or Systematic [335:1352to1361]	This photograph cannot be accepted at face value as being authentic without, at a minimum, adducing evidence from the photographer. The photograph is unreliable and unsuitable to prove facts it purports to prove, and it is inadmissible pursuant to Rule 87(3)(c). Further, the photographer is not presently scheduled to testify in Case 002/01. Because Mr. IENG Sary has not been afforded his absolute right under Rule 84(1) to confront the photographer, this document is also inadmissible pursuant to Rule 87(3)(d). For further argument, <i>see</i> IENG Sary's Objections to the Admissibility of Certain Categories of Documents, 6 September 2011, E114, para. 1 (Standards for the admission of documentary evidence set by the Establishment Law), 7-9 (Reliability), 11 (Relevance), 18-19 (Reports, articles and non-contemporaneous documents).
242	Photograph	> 07 January 1979	Photograph depicting exhumation of mass grave	E190.1.200 P 00407165-00407165	Photograph from Tuol Sleng Museum depicting local villagers in the process of exhuming a mass grave.	VII. FACTUAL FINDINGS OF JOINT CRIMINAL ENTERPRISE [41:156 to 220], C. SECURITY CENTRES AND EXECUTION SITES [47:178 to 204], Widespread or Systematic [335:1352to1361]	This photograph cannot be accepted at face value as being authentic without, at a minimum, adducing evidence from the photographer. The photograph is unreliable and unsuitable to prove facts it purports to prove, and it is inadmissible pursuant to Rule 87(3)(c). Further, the photographer is not presently scheduled to testify in Case 002/01. Because Mr. IENG Sary has not been afforded his absolute right under Rule 84(1) to confront the photographer, this document is also inadmissible pursuant to Rule 87(3)(d). For further argument, <i>see</i> IENG Sary's Objections to the Admissibility of Certain Categories of Documents, 6 September 2011, E114, para. 1 (Standards for the admission of documentary evidence set by the Establishment Law), 7-9 (Reliability), 11 (Relevance), 18-19 (Reports, articles and non-contemporaneous documents).
243	Photograph	> 07 January 1979	Photograph depicting exhumation of mass grave	E190.1.201 P 00407155-00407155	Photograph from Tuol Sleng Museum depicting local villagers in the process of exhuming a mass grave.	VII. FACTUAL FINDINGS OF JOINT CRIMINAL ENTERPRISE [41:156 to 220], C. SECURITY CENTRES AND EXECUTION SITES [47:178 to 204], Widespread or Systematic [335:1352to1361]	This photograph cannot be accepted at face value as being authentic without, at a minimum, adducing evidence from the photographer. The photograph is unreliable and unsuitable to prove facts it purports to prove, and it is inadmissible pursuant to Rule 87(3)(c). Further, the photographer is not presently scheduled to testify in Case 002/01. Because Mr. IENG Sary has not been afforded his absolute right under Rule 84(1) to confront the photographer, this document is also inadmissible pursuant to Rule 87(3)(d). For further argument, <i>see</i> IENG Sary's Objections to the Admissibility of Certain Categories of Documents, 6 September 2011, E114, para. 1 (Standards for the admission of documentary evidence set by the Establishment Law), 7-9 (Reliability), 11 (Relevance), 18-19 (Reports, articles and non-contemporaneous documents).

244	Photograph	> 07 January 1979	Photograph depicting exhumation of mass grave	E190.1.202 P 00407232-00407232	Photograph from Tuol Sleng Museum depicting local villagers in the process of exhuming a mass grave.	VII. FACTUAL FINDINGS OF JOINT CRIMINAL ENTERPRISE [41:156 to 220], C. SECURITY CENTRES AND EXECUTION SITES [47:178 to 204], Widespread or Systematic [335:1352to1361]	This photograph cannot be accepted at face value as being authentic without, at a minimum, adducing evidence from the photographer. The photograph is unreliable and unsuitable to prove facts it purports to prove, and it is inadmissible pursuant to Rule 87(3)(c). Further, the photographer is not presently scheduled to testify in Case 002/01. Because Mr. IENG Sary has not been afforded his absolute right under Rule 84(1) to confront the photographer, this document is also inadmissible pursuant to Rule 87(3)(d). For further argument, <i>see</i> IENG Sary's Objections to the Admissibility of Certain Categories of Documents, 6 September 2011, E114, para. 1 (Standards for the admission of documentary evidence set by the Establishment Law), 7-9 (Reliability), 11 (Relevance), 18-19 (Reports, articles and non-contemporaneous documents).
245	Photograph	> 07 January 1979	Photograph depicting exhumed mass graves	E190.1.204 P 00407231-00407231	Photograph from Tuol Sleng Museum depicting local villagers at the site of recently exhumed mass graves.	VII. FACTUAL FINDINGS OF JOINT CRIMINAL ENTERPRISE [41:156 to 220], C. SECURITY CENTRES AND EXECUTION SITES [47:178 to 204], Widespread or Systematic [335:1352to1361]	This photograph cannot be accepted at face value as being authentic without, at a minimum, adducing evidence from the photographer. The photograph is unreliable and unsuitable to prove facts it purports to prove, and it is inadmissible pursuant to Rule 87(3)(c). Further, the photographer is not presently scheduled to testify in Case 002/01. Because Mr. IENG Sary has not been afforded his absolute right under Rule 84(1) to confront the photographer, this document is also inadmissible pursuant to Rule 87(3)(d). For further argument, <i>see</i> IENG Sary's Objections to the Admissibility of Certain Categories of Documents, 6 September 2011, E114, para. 1 (Standards for the admission of documentary evidence set by the Establishment Law), 7-9 (Reliability), 11 (Relevance), 18-19 (Reports, articles and non-contemporaneous documents).
246	Photograph	> 07 January 1979	Photograph depicting exhumed mass graves	E190.1.203 P 00407257-00407257	Photograph from Tuol Sleng Museum depicting recently exhumed mass graves.	VII. FACTUAL FINDINGS OF JOINT CRIMINAL ENTERPRISE [41:156 to 220], C. SECURITY CENTRES AND EXECUTION SITES [47:178 to 204], Widespread or Systematic [335:1352to1361]	This photograph cannot be accepted at face value as being authentic without, at a minimum, adducing evidence from the photographer. The photograph is unreliable and unsuitable to prove facts it purports to prove, and it is inadmissible pursuant to Rule 87(3)(c). Further, the photographer is not presently scheduled to testify in Case 002/01. Because Mr. IENG Sary has not been afforded his absolute right under Rule 84(1) to confront the photographer, this document is also inadmissible pursuant to Rule 87(3)(d). For further argument, <i>see</i> IENG Sary's Objections to the Admissibility of Certain Categories of Documents, 6 September 2011, E114, para. 1 (Standards for the admission of documentary evidence set by the Establishment Law), 7-9 (Reliability), 11 (Relevance), 18-19 (Reports, articles and non-contemporaneous documents).

247	Photograph	> 07 January 1979	Photograph depicting human skeletal remains	E190.1.285 P 00407124-00407124	Photographs from Tuol Sleng Museum depicting human skeletal remains piled in a makeshift memorial for victims of the DK regime.	VII. FACTUAL FINDINGS OF JOINT CRIMINAL ENTERPRISE [41:156 to 220], C. SECURITY CENTRES AND EXECUTION SITES [47:178 to 204], Widespread or Systematic [335:1352to1361]	This photograph cannot be accepted at face value as being authentic without, at a minimum, adducing evidence from the photographer. The photograph is unreliable and unsuitable to prove facts it purports to prove, and it is inadmissible pursuant to Rule 87(3)(c). Further, the photographer is not presently scheduled to testify in Case 002/01. Because Mr. IENG Sary has not been afforded his absolute right under Rule 84(1) to confront the photographer, this document is also inadmissible pursuant to Rule 87(3)(d). For further argument, <i>see</i> IENG Sary's Objections to the Admissibility of Certain Categories of Documents, 6 September 2011, E114, para. 1 (Standards for the admission of documentary evidence set by the Establishment Law), 7-9 (Reliability), 11 (Relevance), 18-19 (Reports, articles and non-contemporaneous documents).
248	Photograph	> 07 January 1979	Photograph depicting human skeletal remains	E190.1.279 P 00407160-00407160	Photograph from Tuol Sleng Museum depicting human skeletal remains on sand with personal effects including infant's clothing.	VII. FACTUAL FINDINGS OF JOINT CRIMINAL ENTERPRISE [41:156 to 220], C. SECURITY CENTRES AND EXECUTION SITES [47:178 to 204], Widespread or Systematic [335:1352to1361]	This photograph cannot be accepted at face value as being authentic without, at a minimum, adducing evidence from the photographer. The photograph is unreliable and unsuitable to prove facts it purports to prove, and it is inadmissible pursuant to Rule 87(3)(c). Further, the photographer is not presently scheduled to testify in Case 002/01. Because Mr. IENG Sary has not been afforded his absolute right under Rule 84(1) to confront the photographer, this document is also inadmissible pursuant to Rule 87(3)(d). For further argument, <i>see</i> IENG Sary's Objections to the Admissibility of Certain Categories of Documents, 6 September 2011, E114, para. 1 (Standards for the admission of documentary evidence set by the Establishment Law), 7-9 (Reliability), 11 (Relevance), 18-19 (Reports, articles and non-contemporaneous documents).
249	Photograph	> 07 January 1979	Photograph depicting human skeletal remains	E190.1.276 P 00407128-00407128	Photograph from Tuol Sleng Museum depicting a local villager mourning at exhumed mass grave, amid human skeletal remains.	VII. FACTUAL FINDINGS OF JOINT CRIMINAL ENTERPRISE [41:156 to 220], C. SECURITY CENTRES AND EXECUTION SITES [47:178 to 204], Widespread or Systematic [335:1352to1361]	This photograph cannot be accepted at face value as being authentic without, at a minimum, adducing evidence from the photographer. The photograph is unreliable and unsuitable to prove facts it purports to prove, and it is inadmissible pursuant to Rule 87(3)(c). Further, the photographer is not presently scheduled to testify in Case 002/01. Because Mr. IENG Sary has not been afforded his absolute right under Rule 84(1) to confront the photographer, this document is also inadmissible pursuant to Rule 87(3)(d). For further argument, <i>see</i> IENG Sary's Objections to the Admissibility of Certain Categories of Documents, 6 September 2011, E114, para. 1 (Standards for the admission of documentary evidence set by the Establishment Law), 7-9 (Reliability), 11 (Relevance), 18-19 (Reports, articles and non-contemporaneous documents).

250	Photograph	> 07 January 1979	Photograph depicting human skeletal remains	E190.1.264 P 00407193-00407193	Photograph from Tuol Sleng Museum depicting human skeletal remains in a makeshift memorial to victims of the DK regime.	VII. FACTUAL FINDINGS OF JOINT CRIMINAL ENTERPRISE [41:156 to 220], C. SECURITY CENTRES AND EXECUTION SITES [47:178 to 204], Widespread or Systematic [335:1352to1361]	This photograph cannot be accepted at face value as being authentic without, at a minimum, adducing evidence from the photographer. The photograph is unreliable and unsuitable to prove facts it purports to prove, and it is inadmissible pursuant to Rule 87(3)(c). Further, the photographer is not presently scheduled to testify in Case 002/01. Because Mr. IENG Sary has not been afforded his absolute right under Rule 84(1) to confront the photographer, this document is also inadmissible pursuant to Rule 87(3)(d). For further argument, <i>see</i> IENG Sary's Objections to the Admissibility of Certain Categories of Documents, 6 September 2011, E114, para. 1 (Standards for the admission of documentary evidence set by the Establishment Law), 7-9 (Reliability), 11 (Relevance), 18-19 (Reports, articles and non-contemporaneous documents).
251	Photograph	> 07 January 1979	Photograph depicting human skeletal remains	E190.1.281 P 00407151-00407151	Photograph from Tuol Sleng Museum depicting human skeletal remains scattered on forest floor.	VII. FACTUAL FINDINGS OF JOINT CRIMINAL ENTERPRISE [41:156 to 220], C. SECURITY CENTRES AND EXECUTION SITES [47:178 to 204], Widespread or Systematic [335:1352to1361]	This photograph cannot be accepted at face value as being authentic without, at a minimum, adducing evidence from the photographer. The photograph is unreliable and unsuitable to prove facts it purports to prove, and it is inadmissible pursuant to Rule 87(3)(c). Further, the photographer is not presently scheduled to testify in Case 002/01. Because Mr. IENG Sary has not been afforded his absolute right under Rule 84(1) to confront the photographer, this document is also inadmissible pursuant to Rule 87(3)(d). For further argument, <i>see</i> IENG Sary's Objections to the Admissibility of Certain Categories of Documents, 6 September 2011, E114, para. 1 (Standards for the admission of documentary evidence set by the Establishment Law), 7-9 (Reliability), 11 (Relevance), 18-19 (Reports, articles and non-contemporaneous documents).
252	Photograph	> 07 January 1979	Photograph depicting human skeletal remains	E190.1.259 P 00407184-00407184	Photograph from Tuol Sleng Museum depicting human skeletal remains in exhumed mass grave, showing bindings used to restrain prisoners.	VII. FACTUAL FINDINGS OF JOINT CRIMINAL ENTERPRISE [41:156 to 220], C. SECURITY CENTRES AND EXECUTION SITES [47:178 to 204], Widespread or Systematic [335:1352to1361]	This photograph cannot be accepted at face value as being authentic without, at a minimum, adducing evidence from the photographer. The photograph is unreliable and unsuitable to prove facts it purports to prove, and it is inadmissible pursuant to Rule 87(3)(c). Further, the photographer is not presently scheduled to testify in Case 002/01. Because Mr. IENG Sary has not been afforded his absolute right under Rule 84(1) to confront the photographer, this document is also inadmissible pursuant to Rule 87(3)(d). For further argument, <i>see</i> IENG Sary's Objections to the Admissibility of Certain Categories of Documents, 6 September 2011, E114, para. 1 (Standards for the admission of documentary evidence set by the Establishment Law), 7-9 (Reliability), 11 (Relevance), 18-19 (Reports, articles and non-contemporaneous documents).

253	Photograph	> 07 January 1979	Photograph depicting human skeletal remains	E190.1.228 P 00407191-00407191	Photograph from Tuol Sleng Museum depicting human skeletal remains piled in a memorial for victims of the DK regime, with local villagers surrounding the memorial.	VII. FACTUAL FINDINGS OF JOINT CRIMINAL ENTERPRISE [41:156 to 220], C. SECURITY CENTRES AND EXECUTION SITES [47:178 to 204], Widespread or Systematic [335:1352to1361]	This photograph cannot be accepted at face value as being authentic without, at a minimum, adducing evidence from the photographer. The photograph is unreliable and unsuitable to prove facts it purports to prove, and it is inadmissible pursuant to Rule 87(3)(c). Further, the photographer is not presently scheduled to testify in Case 002/01. Because Mr. IENG Sary has not been afforded his absolute right under Rule 84(1) to confront the photographer, this document is also inadmissible pursuant to Rule 87(3)(d). For further argument, <i>see</i> IENG Sary's Objections to the Admissibility of Certain Categories of Documents, 6 September 2011, E114, para. 1 (Standards for the admission of documentary evidence set by the Establishment Law), 7-9 (Reliability), 11 (Relevance), 18-19 (Reports, articles and non-contemporaneous documents).
254	Photograph	> 07 January 1979	Photograph depicting human skeletal remains	E190.1.280 P 00407120-00407120	Photographs from Tuol Sleng Museum depicting human skeletal remains piled in a makeshift memorial for victims of the DK regime.	VII. FACTUAL FINDINGS OF JOINT CRIMINAL ENTERPRISE [41:156 to 220], C. SECURITY CENTRES AND EXECUTION SITES [47:178 to 204], Widespread or Systematic [335:1352to1361]	This photograph cannot be accepted at face value as being authentic without, at a minimum, adducing evidence from the photographer. The photograph is unreliable and unsuitable to prove facts it purports to prove, and it is inadmissible pursuant to Rule 87(3)(c). Further, the photographer is not presently scheduled to testify in Case 002/01. Because Mr. IENG Sary has not been afforded his absolute right under Rule 84(1) to confront the photographer, this document is also inadmissible pursuant to Rule 87(3)(d). For further argument, <i>see</i> IENG Sary's Objections to the Admissibility of Certain Categories of Documents, 6 September 2011, E114, para. 1 (Standards for the admission of documentary evidence set by the Establishment Law), 7-9 (Reliability), 11 (Relevance), 18-19 (Reports, articles and non-contemporaneous documents).
255	Photograph	> 07 January 1979	Photograph depicting human skeletal remains	E190.1.224 P 00407130-00407130	Photograph from Tuol Sleng Museum depicting a local villager at makeshift memorial to DK victims, amidst human skeletal remains.	VII. FACTUAL FINDINGS OF JOINT CRIMINAL ENTERPRISE [41:156 to 220], C. SECURITY CENTRES AND EXECUTION SITES [47:178 to 204], Widespread or Systematic [335:1352to1361]	This photograph cannot be accepted at face value as being authentic without, at a minimum, adducing evidence from the photographer. The photograph is unreliable and unsuitable to prove facts it purports to prove, and it is inadmissible pursuant to Rule 87(3)(c). Further, the photographer is not presently scheduled to testify in Case 002/01. Because Mr. IENG Sary has not been afforded his absolute right under Rule 84(1) to confront the photographer, this document is also inadmissible pursuant to Rule 87(3)(d). For further argument, <i>see</i> IENG Sary's Objections to the Admissibility of Certain Categories of Documents, 6 September 2011, E114, para. 1 (Standards for the admission of documentary evidence set by the Establishment Law), 7-9 (Reliability), 11 (Relevance), 18-19 (Reports, articles and non-contemporaneous documents).

256	Photograph	> 07 January 1979	Photograph depicting human skeletal remains	E190.1.247 P 00407146-00407146	Photograph from Tuol Sleng Museum depicting fragments of human skeletal remains at the site of a mass grave exhumation.	VII. FACTUAL FINDINGS OF JOINT CRIMINAL ENTERPRISE [41:156 to 220], C. SECURITY CENTRES AND EXECUTION SITES [47:178 to 204], Widespread or Systematic [335:1352to1361]	This photograph cannot be accepted at face value as being authentic without, at a minimum, adducing evidence from the photographer. The photograph is unreliable and unsuitable to prove facts it purports to prove, and it is inadmissible pursuant to Rule 87(3)(c). Further, the photographer is not presently scheduled to testify in Case 002/01. Because Mr. IENG Sary has not been afforded his absolute right under Rule 84(1) to confront the photographer, this document is also inadmissible pursuant to Rule 87(3)(d). For further argument, <i>see</i> IENG Sary's Objections to the Admissibility of Certain Categories of Documents, 6 September 2011, E114, para. 1 (Standards for the admission of documentary evidence set by the Establishment Law), 7-9 (Reliability), 11 (Relevance), 18-19 (Reports, articles and non-contemporaneous documents).
257	Photograph	> 07 January 1979	Photograph depicting human skeletal remains	E190.1.209 P 00407109-00407109	Photograph from Tuol Sleng Museum depicting human skeletal remains piled in a makeshift memorial for victims of the DK regime.	VII. FACTUAL FINDINGS OF JOINT CRIMINAL ENTERPRISE [41:156 to 220], C. SECURITY CENTRES AND EXECUTION SITES [47:178 to 204], Widespread or Systematic [335:1352to1361]	This photograph cannot be accepted at face value as being authentic without, at a minimum, adducing evidence from the photographer. The photograph is unreliable and unsuitable to prove facts it purports to prove, and it is inadmissible pursuant to Rule 87(3)(c). Further, the photographer is not presently scheduled to testify in Case 002/01. Because Mr. IENG Sary has not been afforded his absolute right under Rule 84(1) to confront the photographer, this document is also inadmissible pursuant to Rule 87(3)(d). For further argument, <i>see</i> IENG Sary's Objections to the Admissibility of Certain Categories of Documents, 6 September 2011, E114, para. 1 (Standards for the admission of documentary evidence set by the Establishment Law), 7-9 (Reliability), 11 (Relevance), 18-19 (Reports, articles and non-contemporaneous documents).
258	Photograph	> 07 January 1979	Photograph depicting human skeletal remains	E190.1.267 P 00407162-00407162	Photograph from Tuol Sleng Museum depicting a local villager at memorial to DK victims	VII. FACTUAL FINDINGS OF JOINT CRIMINAL ENTERPRISE [41:156 to 220], C. SECURITY CENTRES AND EXECUTION SITES [47:178 to 204], Widespread or Systematic [335:1352to1361]	This photograph cannot be accepted at face value as being authentic without, at a minimum, adducing evidence from the photographer. The photograph is unreliable and unsuitable to prove facts it purports to prove, and it is inadmissible pursuant to Rule 87(3)(c). Further, the photographer is not presently scheduled to testify in Case 002/01. Because Mr. IENG Sary has not been afforded his absolute right under Rule 84(1) to confront the photographer, this document is also inadmissible pursuant to Rule 87(3)(d). For further argument, <i>see</i> IENG Sary's Objections to the Admissibility of Certain Categories of Documents, 6 September 2011, E114, para. 1 (Standards for the admission of documentary evidence set by the Establishment Law), 7-9 (Reliability), 11 (Relevance), 18-19 (Reports, articles and non-contemporaneous documents).

259	Photograph	> 07 January 1979	Photograph depicting human skeletal remains	E190.1.229 P 00407183-00407183	Photograph from Tuol Sleng Museum depicting human skeletal remains in an exhumed mass grave.	VII. FACTUAL FINDINGS OF JOINT CRIMINAL ENTERPRISE [41:156 to 220], C. SECURITY CENTRES AND EXECUTION SITES [47:178 to 204], Widespread or Systematic [335:1352to1361]	This photograph cannot be accepted at face value as being authentic without, at a minimum, adducing evidence from the photographer. The photograph is unreliable and unsuitable to prove facts it purports to prove, and it is inadmissible pursuant to Rule 87(3)(c). Further, the photographer is not presently scheduled to testify in Case 002/01. Because Mr. IENG Sary has not been afforded his absolute right under Rule 84(1) to confront the photographer, this document is also inadmissible pursuant to Rule 87(3)(d). For further argument, <i>see</i> IENG Sary's Objections to the Admissibility of Certain Categories of Documents, 6 September 2011, E114, para. 1 (Standards for the admission of documentary evidence set by the Establishment Law), 7-9 (Reliability), 11 (Relevance), 18-19 (Reports, articles and non-contemporaneous documents).
260	Photograph	> 07 January 1979	Photograph depicting human skeletal remains	E190.1.243 P 00407145-00407145	Photograph from Tuol Sleng Museum depicting human skeletal remains in a memorial to victims of the DK regime.	VII. FACTUAL FINDINGS OF JOINT CRIMINAL ENTERPRISE [41:156 to 220], C. SECURITY CENTRES AND EXECUTION SITES [47:178 to 204], Widespread or Systematic [335:1352to1361]	This photograph cannot be accepted at face value as being authentic without, at a minimum, adducing evidence from the photographer. The photograph is unreliable and unsuitable to prove facts it purports to prove, and it is inadmissible pursuant to Rule 87(3)(c). Further, the photographer is not presently scheduled to testify in Case 002/01. Because Mr. IENG Sary has not been afforded his absolute right under Rule 84(1) to confront the photographer, this document is also inadmissible pursuant to Rule 87(3)(d). For further argument, <i>see</i> IENG Sary's Objections to the Admissibility of Certain Categories of Documents, 6 September 2011, E114, para. 1 (Standards for the admission of documentary evidence set by the Establishment Law), 7-9 (Reliability), 11 (Relevance), 18-19 (Reports, articles and non-contemporaneous documents).
261	Photograph	> 07 January 1979	Photograph depicting human skeletal remains	E190.1.214 P 00407246-00407246	Photograph from Tuol Sleng Museum depicting human skeletal remains surrounding exhumed mass graves.	VII. FACTUAL FINDINGS OF JOINT CRIMINAL ENTERPRISE [41:156 to 220], C. SECURITY CENTRES AND EXECUTION SITES [47:178 to 204], Widespread or Systematic [335:1352to1361]	This photograph cannot be accepted at face value as being authentic without, at a minimum, adducing evidence from the photographer. The photograph is unreliable and unsuitable to prove facts it purports to prove, and it is inadmissible pursuant to Rule 87(3)(c). Further, the photographer is not presently scheduled to testify in Case 002/01. Because Mr. IENG Sary has not been afforded his absolute right under Rule 84(1) to confront the photographer, this document is also inadmissible pursuant to Rule 87(3)(d). For further argument, <i>see</i> IENG Sary's Objections to the Admissibility of Certain Categories of Documents, 6 September 2011, E114, para. 1 (Standards for the admission of documentary evidence set by the Establishment Law), 7-9 (Reliability), 11 (Relevance), 18-19 (Reports, articles and non-contemporaneous documents).

262	Photograph	> 07 January 1979	Photograph depicting human skeletal remains	E190.1.248 P 00407188-00407188	Photograph from Tuol Sleng Museum depicting human skeletal remains scattered on the ground.	VII. FACTUAL FINDINGS OF JOINT CRIMINAL ENTERPRISE [41:156 to 220], C. SECURITY CENTRES AND EXECUTION SITES [47:178 to 204], Widespread or Systematic [335:1352to1361]	This photograph cannot be accepted at face value as being authentic without, at a minimum, adducing evidence from the photographer. The photograph is unreliable and unsuitable to prove facts it purports to prove, and it is inadmissible pursuant to Rule 87(3)(c). Further, the photographer is not presently scheduled to testify in Case 002/01. Because Mr. IENG Sary has not been afforded his absolute right under Rule 84(1) to confront the photographer, this document is also inadmissible pursuant to Rule 87(3)(d). For further argument, <i>see</i> IENG Sary's Objections to the Admissibility of Certain Categories of Documents, 6 September 2011, E114, para. 1 (Standards for the admission of documentary evidence set by the Establishment Law), 7-9 (Reliability), 11 (Relevance), 18-19 (Reports, articles and non-contemporaneous documents).
263	Photograph	> 07 January 1979	Photograph depicting human skeletal remains	E190.1.265 P 00407187-00407187	Photograph from Tuol Sleng Museum depicting human skeletal remains scattered on the ground.	VII. FACTUAL FINDINGS OF JOINT CRIMINAL ENTERPRISE [41:156 to 220], C. SECURITY CENTRES AND EXECUTION SITES [47:178 to 204], Widespread or Systematic [335:1352to1361]	This photograph cannot be accepted at face value as being authentic without, at a minimum, adducing evidence from the photographer. The photograph is unreliable and unsuitable to prove facts it purports to prove, and it is inadmissible pursuant to Rule 87(3)(c). Further, the photographer is not presently scheduled to testify in Case 002/01. Because Mr. IENG Sary has not been afforded his absolute right under Rule 84(1) to confront the photographer, this document is also inadmissible pursuant to Rule 87(3)(d). For further argument, <i>see</i> IENG Sary's Objections to the Admissibility of Certain Categories of Documents, 6 September 2011, E114, para. 1 (Standards for the admission of documentary evidence set by the Establishment Law), 7-9 (Reliability), 11 (Relevance), 18-19 (Reports, articles and non-contemporaneous documents).
264	Photograph	> 07 January 1979	Photograph depicting human skeletal remains	E190.1.270 P 00407137-00407137	Photograph from Tuol Sleng Museum depicting the recovery of human skeletal remains from a well where victims of the DK regime had been dumped.	VII. FACTUAL FINDINGS OF JOINT CRIMINAL ENTERPRISE [41:156 to 220], C. SECURITY CENTRES AND EXECUTION SITES [47:178 to 204], Widespread or Systematic [335:1352to1361]	This photograph cannot be accepted at face value as being authentic without, at a minimum, adducing evidence from the photographer. The photograph is unreliable and unsuitable to prove facts it purports to prove, and it is inadmissible pursuant to Rule 87(3)(c). Further, the photographer is not presently scheduled to testify in Case 002/01. Because Mr. IENG Sary has not been afforded his absolute right under Rule 84(1) to confront the photographer, this document is also inadmissible pursuant to Rule 87(3)(d). For further argument, <i>see</i> IENG Sary's Objections to the Admissibility of Certain Categories of Documents, 6 September 2011, E114, para. 1 (Standards for the admission of documentary evidence set by the Establishment Law), 7-9 (Reliability), 11 (Relevance), 18-19 (Reports, articles and non-contemporaneous documents).

265	Photograph	> 07 January 1979	Photograph depicting human skeletal remains	E190.1.237 P 00407174-00407174	Photograph from Tuol Sleng Museum depicting human skeletal remains in a mass grave in the process of being exhumed.	VII. FACTUAL FINDINGS OF JOINT CRIMINAL ENTERPRISE [41:156 to 220], C. SECURITY CENTRES AND EXECUTION SITES [47:178 to 204], Widespread or Systematic [335:1352to1361]	This photograph cannot be accepted at face value as being authentic without, at a minimum, adducing evidence from the photographer. The photograph is unreliable and unsuitable to prove facts it purports to prove, and it is inadmissible pursuant to Rule 87(3)(c). Further, the photographer is not presently scheduled to testify in Case 002/01. Because Mr. IENG Sary has not been afforded his absolute right under Rule 84(1) to confront the photographer, this document is also inadmissible pursuant to Rule 87(3)(d). For further argument, <i>see</i> IENG Sary's Objections to the Admissibility of Certain Categories of Documents, 6 September 2011, E114, para. 1 (Standards for the admission of documentary evidence set by the Establishment Law), 7-9 (Reliability), 11 (Relevance), 18-19 (Reports, articles and non-contemporaneous documents).
266	Photograph	> 07 January 1979	Photograph depicting human skeletal remains	E190.1.219 P 00407168-00407168	Photograph from Tuol Sleng Museum depicting local villagers at the site of recently exhumed mass graves, with pile of human skeletal remains.	VII. FACTUAL FINDINGS OF JOINT CRIMINAL ENTERPRISE [41:156 to 220], C. SECURITY CENTRES AND EXECUTION SITES [47:178 to 204], Widespread or Systematic [335:1352to1361]	This photograph cannot be accepted at face value as being authentic without, at a minimum, adducing evidence from the photographer. The photograph is unreliable and unsuitable to prove facts it purports to prove, and it is inadmissible pursuant to Rule 87(3)(c). Further, the photographer is not presently scheduled to testify in Case 002/01. Because Mr. IENG Sary has not been afforded his absolute right under Rule 84(1) to confront the photographer, this document is also inadmissible pursuant to Rule 87(3)(d). For further argument, <i>see</i> IENG Sary's Objections to the Admissibility of Certain Categories of Documents, 6 September 2011, E114, para. 1 (Standards for the admission of documentary evidence set by the Establishment Law), 7-9 (Reliability), 11 (Relevance), 18-19 (Reports, articles and non-contemporaneous documents).
267	Photograph	> 07 January 1979	Photograph depicting human skeletal remains	E190.1.275 P 00407149-00407149	Photograph from Tuol Sleng Museum depicting fragments of human skeletal remains at the site of a mass grave exhumation.	VII. FACTUAL FINDINGS OF JOINT CRIMINAL ENTERPRISE [41:156 to 220], C. SECURITY CENTRES AND EXECUTION SITES [47:178 to 204], Widespread or Systematic [335:1352to1361]	This photograph cannot be accepted at face value as being authentic without, at a minimum, adducing evidence from the photographer. The photograph is unreliable and unsuitable to prove facts it purports to prove, and it is inadmissible pursuant to Rule 87(3)(c). Further, the photographer is not presently scheduled to testify in Case 002/01. Because Mr. IENG Sary has not been afforded his absolute right under Rule 84(1) to confront the photographer, this document is also inadmissible pursuant to Rule 87(3)(d). For further argument, <i>see</i> IENG Sary's Objections to the Admissibility of Certain Categories of Documents, 6 September 2011, E114, para. 1 (Standards for the admission of documentary evidence set by the Establishment Law), 7-9 (Reliability), 11 (Relevance), 18-19 (Reports, articles and non-contemporaneous documents).

268	Photograph	> 07 January 1979	Photograph depicting human skeletal remains	E190.1.238 P 00407142-00407142	Photograph from Tuol Sleng Museum depicting fragments of human skeletal remains at the site of a mass grave exhumation.	VII. FACTUAL FINDINGS OF JOINT CRIMINAL ENTERPRISE [41:156 to 220], C. SECURITY CENTRES AND EXECUTION SITES [47:178 to 204], Widespread or Systematic [335:1352to1361]	This photograph cannot be accepted at face value as being authentic without, at a minimum, adducing evidence from the photographer. The photograph is unreliable and unsuitable to prove facts it purports to prove, and it is inadmissible pursuant to Rule 87(3)(c). Further, the photographer is not presently scheduled to testify in Case 002/01. Because Mr. IENG Sary has not been afforded his absolute right under Rule 84(1) to confront the photographer, this document is also inadmissible pursuant to Rule 87(3)(d). For further argument, <i>see</i> IENG Sary's Objections to the Admissibility of Certain Categories of Documents, 6 September 2011, E114, para. 1 (Standards for the admission of documentary evidence set by the Establishment Law), 7-9 (Reliability), 11 (Relevance), 18-19 (Reports, articles and non-contemporaneous documents).
269	Photograph	> 07 January 1979	Photograph depicting human skeletal remains	E190.1.250 P 00407110-00407110	Photograph from Tuol Sleng Museum depicting human skeletal remains piled in a makeshift memorial for victims of the DK regime.	VII. FACTUAL FINDINGS OF JOINT CRIMINAL ENTERPRISE [41:156 to 220], C. SECURITY CENTRES AND EXECUTION SITES [47:178 to 204], Widespread or Systematic [335:1352to1361]	This photograph cannot be accepted at face value as being authentic without, at a minimum, adducing evidence from the photographer. The photograph is unreliable and unsuitable to prove facts it purports to prove, and it is inadmissible pursuant to Rule 87(3)(c). Further, the photographer is not presently scheduled to testify in Case 002/01. Because Mr. IENG Sary has not been afforded his absolute right under Rule 84(1) to confront the photographer, this document is also inadmissible pursuant to Rule 87(3)(d). For further argument, <i>see</i> IENG Sary's Objections to the Admissibility of Certain Categories of Documents, 6 September 2011, E114, para. 1 (Standards for the admission of documentary evidence set by the Establishment Law), 7-9 (Reliability), 11 (Relevance), 18-19 (Reports, articles and non-contemporaneous documents).
270	Photograph	> 07 January 1979	Photograph depicting human skeletal remains	E190.1.241 P 00407144-00407144	Photograph from Tuol Sleng Museum depicting human skeletal remains in a mass grave in the process of being exhumed.	VII. FACTUAL FINDINGS OF JOINT CRIMINAL ENTERPRISE [41:156 to 220], C. SECURITY CENTRES AND EXECUTION SITES [47:178 to 204], Widespread or Systematic [335:1352to1361]	This photograph cannot be accepted at face value as being authentic without, at a minimum, adducing evidence from the photographer. The photograph is unreliable and unsuitable to prove facts it purports to prove, and it is inadmissible pursuant to Rule 87(3)(c). Further, the photographer is not presently scheduled to testify in Case 002/01. Because Mr. IENG Sary has not been afforded his absolute right under Rule 84(1) to confront the photographer, this document is also inadmissible pursuant to Rule 87(3)(d). For further argument, <i>see</i> IENG Sary's Objections to the Admissibility of Certain Categories of Documents, 6 September 2011, E114, para. 1 (Standards for the admission of documentary evidence set by the Establishment Law), 7-9 (Reliability), 11 (Relevance), 18-19 (Reports, articles and non-contemporaneous documents).

271	Photograph	> 07 January 1979	Photograph depicting human skeletal remains	E190.1.233 P 00407161-00407161	Photograph from Tuol Sleng Museum depicting a local villager at makeshift memorial to DK victims, amidst human skeletal remains.	VII. FACTUAL FINDINGS OF JOINT CRIMINAL ENTERPRISE [41:156 to 220], C. SECURITY CENTRES AND EXECUTION SITES [47:178 to 204], Widespread or Systematic [335:1352to1361]	This photograph cannot be accepted at face value as being authentic without, at a minimum, adducing evidence from the photographer. The photograph is unreliable and unsuitable to prove facts it purports to prove, and it is inadmissible pursuant to Rule 87(3)(c). Further, the photographer is not presently scheduled to testify in Case 002/01. Because Mr. IENG Sary has not been afforded his absolute right under Rule 84(1) to confront the photographer, this document is also inadmissible pursuant to Rule 87(3)(d). For further argument, <i>see</i> IENG Sary's Objections to the Admissibility of Certain Categories of Documents, 6 September 2011, E114, para. 1 (Standards for the admission of documentary evidence set by the Establishment Law), 7-9 (Reliability), 11 (Relevance), 18-19 (Reports, articles and non-contemporaneous documents).
272	Photograph	> 07 January 1979	Photograph depicting human skeletal remains	E190.1.271 P 00407230-00407230	Photograph from Tuol Sleng Museum depicting human skeletal remains in a mass grave in the process of being exhumed.	VII. FACTUAL FINDINGS OF JOINT CRIMINAL ENTERPRISE [41:156 to 220], C. SECURITY CENTRES AND EXECUTION SITES [47:178 to 204], Widespread or Systematic [335:1352to1361]	This photograph cannot be accepted at face value as being authentic without, at a minimum, adducing evidence from the photographer. The photograph is unreliable and unsuitable to prove facts it purports to prove, and it is inadmissible pursuant to Rule 87(3)(c). Further, the photographer is not presently scheduled to testify in Case 002/01. Because Mr. IENG Sary has not been afforded his absolute right under Rule 84(1) to confront the photographer, this document is also inadmissible pursuant to Rule 87(3)(d). For further argument, <i>see</i> IENG Sary's Objections to the Admissibility of Certain Categories of Documents, 6 September 2011, E114, para. 1 (Standards for the admission of documentary evidence set by the Establishment Law), 7-9 (Reliability), 11 (Relevance), 18-19 (Reports, articles and non-contemporaneous documents).
273	Photograph	> 07 January 1979	Photograph depicting human skeletal remains	E190.1.211 P 00407132-00407132	Photograph from Tuol Sleng Museum depicting human skeletal remains in the process of being exhumed from a mass grave.	VII. FACTUAL FINDINGS OF JOINT CRIMINAL ENTERPRISE [41:156 to 220], C. SECURITY CENTRES AND EXECUTION SITES [47:178 to 204], Widespread or Systematic [335:1352to1361]	This photograph cannot be accepted at face value as being authentic without, at a minimum, adducing evidence from the photographer. The photograph is unreliable and unsuitable to prove facts it purports to prove, and it is inadmissible pursuant to Rule 87(3)(c). Further, the photographer is not presently scheduled to testify in Case 002/01. Because Mr. IENG Sary has not been afforded his absolute right under Rule 84(1) to confront the photographer, this document is also inadmissible pursuant to Rule 87(3)(d). For further argument, <i>see</i> IENG Sary's Objections to the Admissibility of Certain Categories of Documents, 6 September 2011, E114, para. 1 (Standards for the admission of documentary evidence set by the Establishment Law), 7-9 (Reliability), 11 (Relevance), 18-19 (Reports, articles and non-contemporaneous documents).

274	Photograph	> 07 January 1979	Photograph depicting human skeletal remains	E190.1.236 P 00407152-00407152	Photograph from Tuol Sleng Museum depicting local villagers exhuming mass grave, with human skeletal remains visible in the grave.	VII. FACTUAL FINDINGS OF JOINT CRIMINAL ENTERPRISE [41:156 to 220], C. SECURITY CENTRES AND EXECUTION SITES [47:178 to 204], Widespread or Systematic [335:1352to1361]	This photograph cannot be accepted at face value as being authentic without, at a minimum, adducing evidence from the photographer. The photograph is unreliable and unsuitable to prove facts it purports to prove, and it is inadmissible pursuant to Rule 87(3)(c). Further, the photographer is not presently scheduled to testify in Case 002/01. Because Mr. IENG Sary has not been afforded his absolute right under Rule 84(1) to confront the photographer, this document is also inadmissible pursuant to Rule 87(3)(d). For further argument, <i>see</i> IENG Sary's Objections to the Admissibility of Certain Categories of Documents, 6 September 2011, E114, para. 1 (Standards for the admission of documentary evidence set by the Establishment Law), 7-9 (Reliability), 11 (Relevance), 18-19 (Reports, articles and non-contemporaneous documents).
275	Photograph	> 07 January 1979	Photograph depicting human skeletal remains	E190.1.232 P 00407143-00407143	Photograph from Tuol Sleng Museum depicting human skeletal remains scattered in a field.	VII. FACTUAL FINDINGS OF JOINT CRIMINAL ENTERPRISE [41:156 to 220], C. SECURITY CENTRES AND EXECUTION SITES [47:178 to 204], Widespread or Systematic [335:1352to1361]	This photograph cannot be accepted at face value as being authentic without, at a minimum, adducing evidence from the photographer. The photograph is unreliable and unsuitable to prove facts it purports to prove, and it is inadmissible pursuant to Rule 87(3)(c). Further, the photographer is not presently scheduled to testify in Case 002/01. Because Mr. IENG Sary has not been afforded his absolute right under Rule 84(1) to confront the photographer, this document is also inadmissible pursuant to Rule 87(3)(d). For further argument, <i>see</i> IENG Sary's Objections to the Admissibility of Certain Categories of Documents, 6 September 2011, E114, para. 1 (Standards for the admission of documentary evidence set by the Establishment Law), 7-9 (Reliability), 11 (Relevance), 18-19 (Reports, articles and non-contemporaneous documents).
276	Photograph	> 07 January 1979	Photograph depicting human skeletal remains	E190.1.216 P 00407156-00407156	Photograph from Tuol Sleng Museum depicting human skeletal remains in a mass grave in the process of being exhumed.	VII. FACTUAL FINDINGS OF JOINT CRIMINAL ENTERPRISE [41:156 to 220], C. SECURITY CENTRES AND EXECUTION SITES [47:178 to 204], Widespread or Systematic [335:1352to1361]	This photograph cannot be accepted at face value as being authentic without, at a minimum, adducing evidence from the photographer. The photograph is unreliable and unsuitable to prove facts it purports to prove, and it is inadmissible pursuant to Rule 87(3)(c). Further, the photographer is not presently scheduled to testify in Case 002/01. Because Mr. IENG Sary has not been afforded his absolute right under Rule 84(1) to confront the photographer, this document is also inadmissible pursuant to Rule 87(3)(d). For further argument, <i>see</i> IENG Sary's Objections to the Admissibility of Certain Categories of Documents, 6 September 2011, E114, para. 1 (Standards for the admission of documentary evidence set by the Establishment Law), 7-9 (Reliability), 11 (Relevance), 18-19 (Reports, articles and non-contemporaneous documents).

277	Photograph	> 07 January 1979	Photograph depicting human skeletal remains	E190.1.223 P 00407251-00407251	Photograph from Tuol Sleng Museum depicting rows of human skulls at the edge of a recently exhumed mass grave.	VII. FACTUAL FINDINGS OF JOINT CRIMINAL ENTERPRISE [41:156 to 220], C. SECURITY CENTRES AND EXECUTION SITES [47:178 to 204], Widespread or Systematic [335:1352to1361]	This photograph cannot be accepted at face value as being authentic without, at a minimum, adducing evidence from the photographer. The photograph is unreliable and unsuitable to prove facts it purports to prove, and it is inadmissible pursuant to Rule 87(3)(c). Further, the photographer is not presently scheduled to testify in Case 002/01. Because Mr. IENG Sary has not been afforded his absolute right under Rule 84(1) to confront the photographer, this document is also inadmissible pursuant to Rule 87(3)(d). For further argument, <i>see</i> IENG Sary's Objections to the Admissibility of Certain Categories of Documents, 6 September 2011, E114, para. 1 (Standards for the admission of documentary evidence set by the Establishment Law), 7-9 (Reliability), 11 (Relevance), 18-19 (Reports, articles and non-contemporaneous documents).
278	Photograph	> 07 January 1979	Photograph depicting human skeletal remains	E190.1.244 P 00407153-00407153	Photograph from Tuol Sleng Museum depicting local villagers examining human skeletal remains scattered about the forest floor.	VII. FACTUAL FINDINGS OF JOINT CRIMINAL ENTERPRISE [41:156 to 220], C. SECURITY CENTRES AND EXECUTION SITES [47:178 to 204], Widespread or Systematic [335:1352to1361]	This photograph cannot be accepted at face value as being authentic without, at a minimum, adducing evidence from the photographer. The photograph is unreliable and unsuitable to prove facts it purports to prove, and it is inadmissible pursuant to Rule 87(3)(c). Further, the photographer is not presently scheduled to testify in Case 002/01. Because Mr. IENG Sary has not been afforded his absolute right under Rule 84(1) to confront the photographer, this document is also inadmissible pursuant to Rule 87(3)(d). For further argument, <i>see</i> IENG Sary's Objections to the Admissibility of Certain Categories of Documents, 6 September 2011, E114, para. 1 (Standards for the admission of documentary evidence set by the Establishment Law), 7-9 (Reliability), 11 (Relevance), 18-19 (Reports, articles and non-contemporaneous documents).
279	Photograph	> 07 January 1979	Photograph depicting human skeletal remains	E190.1.245 P 00407233-00407233	Photograph from Tuol Sleng Museum depicting local villagers exhuming mass grave, with human skeletal remains visible on the ground.	VII. FACTUAL FINDINGS OF JOINT CRIMINAL ENTERPRISE [41:156 to 220], C. SECURITY CENTRES AND EXECUTION SITES [47:178 to 204], Widespread or Systematic [335:1352to1361]	This photograph cannot be accepted at face value as being authentic without, at a minimum, adducing evidence from the photographer. The photograph is unreliable and unsuitable to prove facts it purports to prove, and it is inadmissible pursuant to Rule 87(3)(c). Further, the photographer is not presently scheduled to testify in Case 002/01. Because Mr. IENG Sary has not been afforded his absolute right under Rule 84(1) to confront the photographer, this document is also inadmissible pursuant to Rule 87(3)(d). For further argument, <i>see</i> IENG Sary's Objections to the Admissibility of Certain Categories of Documents, 6 September 2011, E114, para. 1 (Standards for the admission of documentary evidence set by the Establishment Law), 7-9 (Reliability), 11 (Relevance), 18-19 (Reports, articles and non-contemporaneous documents).

280	Photograph	> 07 January 1979	Photograph depicting human skeletal remains	E190.1.254 P 00407154-00407154	Photograph from Tuol Sleng Museum depicting local villagers exhuming a mass grave, with human skeletal remains in the grave.	VII. FACTUAL FINDINGS OF JOINT CRIMINAL ENTERPRISE [41:156 to 220], C. SECURITY CENTRES AND EXECUTION SITES [47:178 to 204], Widespread or Systematic [335:1352to1361]	This photograph cannot be accepted at face value as being authentic without, at a minimum, adducing evidence from the photographer. The photograph is unreliable and unsuitable to prove facts it purports to prove, and it is inadmissible pursuant to Rule 87(3)(c). Further, the photographer is not presently scheduled to testify in Case 002/01. Because Mr. IENG Sary has not been afforded his absolute right under Rule 84(1) to confront the photographer, this document is also inadmissible pursuant to Rule 87(3)(d). For further argument, <i>see</i> IENG Sary's Objections to the Admissibility of Certain Categories of Documents, 6 September 2011, E114, para. 1 (Standards for the admission of documentary evidence set by the Establishment Law), 7-9 (Reliability), 11 (Relevance), 18-19 (Reports, articles and non-contemporaneous documents).
281	Photograph	> 07 January 1979	Photograph depicting human skeletal remains	E190.1.251 P 00407241-00407241	Photograph from Tuol Sleng Museum depicting a local villager in the process of exhuming a mass grave, with human skeletal remains visible in the grave.	VII. FACTUAL FINDINGS OF JOINT CRIMINAL ENTERPRISE [41:156 to 220], C. SECURITY CENTRES AND EXECUTION SITES [47:178 to 204], Widespread or Systematic [335:1352to1361]	This photograph cannot be accepted at face value as being authentic without, at a minimum, adducing evidence from the photographer. The photograph is unreliable and unsuitable to prove facts it purports to prove, and it is inadmissible pursuant to Rule 87(3)(c). Further, the photographer is not presently scheduled to testify in Case 002/01. Because Mr. IENG Sary has not been afforded his absolute right under Rule 84(1) to confront the photographer, this document is also inadmissible pursuant to Rule 87(3)(d). For further argument, <i>see</i> IENG Sary's Objections to the Admissibility of Certain Categories of Documents, 6 September 2011, E114, para. 1 (Standards for the admission of documentary evidence set by the Establishment Law), 7-9 (Reliability), 11 (Relevance), 18-19 (Reports, articles and non-contemporaneous documents).
282	Photograph	> 07 January 1979	Photograph depicting human skeletal remains	E190.1.284 P 00407169-00407169	Photograph from Tuol Sleng Museum depicting human skeletal remains in a makeshift memorial to victims of the DK regime.	VII. FACTUAL FINDINGS OF JOINT CRIMINAL ENTERPRISE [41:156 to 220], C. SECURITY CENTRES AND EXECUTION SITES [47:178 to 204], Widespread or Systematic [335:1352to1361]	This photograph cannot be accepted at face value as being authentic without, at a minimum, adducing evidence from the photographer. The photograph is unreliable and unsuitable to prove facts it purports to prove, and it is inadmissible pursuant to Rule 87(3)(c). Further, the photographer is not presently scheduled to testify in Case 002/01. Because Mr. IENG Sary has not been afforded his absolute right under Rule 84(1) to confront the photographer, this document is also inadmissible pursuant to Rule 87(3)(d). For further argument, <i>see</i> IENG Sary's Objections to the Admissibility of Certain Categories of Documents, 6 September 2011, E114, para. 1 (Standards for the admission of documentary evidence set by the Establishment Law), 7-9 (Reliability), 11 (Relevance), 18-19 (Reports, articles and non-contemporaneous documents).

283	Photograph	> 07 January 1979	Photograph depicting human skeletal remains	E190.1.212 P 00407239-00407239	Photograph from Tuol Sleng Museum depicting two soldiers and a civilian observing human skeletal remains beside a recently exhumed mass grave.	VII. FACTUAL FINDINGS OF JOINT CRIMINAL ENTERPRISE [41:156 to 220], C. SECURITY CENTRES AND EXECUTION SITES [47:178 to 204], Widespread or Systematic [335:1352to1361]	This photograph cannot be accepted at face value as being authentic without, at a minimum, adducing evidence from the photographer. The photograph is unreliable and unsuitable to prove facts it purports to prove, and it is inadmissible pursuant to Rule 87(3)(c). Further, the photographer is not presently scheduled to testify in Case 002/01. Because Mr. IENG Sary has not been afforded his absolute right under Rule 84(1) to confront the photographer, this document is also inadmissible pursuant to Rule 87(3)(d). For further argument, <i>see</i> IENG Sary's Objections to the Admissibility of Certain Categories of Documents, 6 September 2011, E114, para. 1 (Standards for the admission of documentary evidence set by the Establishment Law), 7-9 (Reliability), 11 (Relevance), 18-19 (Reports, articles and non-contemporaneous documents).
284	Photograph	> 07 January 1979	Photograph depicting human skeletal remains	E190.1.234 P 00407250-00407250	Photograph from Tuol Sleng Museum depicting human skeletal remains in a mass grave in the process of being exhumed.	VII. FACTUAL FINDINGS OF JOINT CRIMINAL ENTERPRISE [41:156 to 220], C. SECURITY CENTRES AND EXECUTION SITES [47:178 to 204], Widespread or Systematic [335:1352to1361]	This photograph cannot be accepted at face value as being authentic without, at a minimum, adducing evidence from the photographer. The photograph is unreliable and unsuitable to prove facts it purports to prove, and it is inadmissible pursuant to Rule 87(3)(c). Further, the photographer is not presently scheduled to testify in Case 002/01. Because Mr. IENG Sary has not been afforded his absolute right under Rule 84(1) to confront the photographer, this document is also inadmissible pursuant to Rule 87(3)(d). For further argument, <i>see</i> IENG Sary's Objections to the Admissibility of Certain Categories of Documents, 6 September 2011, E114, para. 1 (Standards for the admission of documentary evidence set by the Establishment Law), 7-9 (Reliability), 11 (Relevance), 18-19 (Reports, articles and non-contemporaneous documents).
285	Photograph	> 07 January 1979	Photograph depicting human skeletal remains	E190.1.242 P 00407164-00407164	Photograph from Tuol Sleng Museum depicting local villagers at the site of recently exhumed mass graves, with pile of human skeletal remains.	VII. FACTUAL FINDINGS OF JOINT CRIMINAL ENTERPRISE [41:156 to 220], C. SECURITY CENTRES AND EXECUTION SITES [47:178 to 204], Widespread or Systematic [335:1352to1361]	This photograph cannot be accepted at face value as being authentic without, at a minimum, adducing evidence from the photographer. The photograph is unreliable and unsuitable to prove facts it purports to prove, and it is inadmissible pursuant to Rule 87(3)(c). Further, the photographer is not presently scheduled to testify in Case 002/01. Because Mr. IENG Sary has not been afforded his absolute right under Rule 84(1) to confront the photographer, this document is also inadmissible pursuant to Rule 87(3)(d). For further argument, <i>see</i> IENG Sary's Objections to the Admissibility of Certain Categories of Documents, 6 September 2011, E114, para. 1 (Standards for the admission of documentary evidence set by the Establishment Law), 7-9 (Reliability), 11 (Relevance), 18-19 (Reports, articles and non-contemporaneous documents).

286	Photograph	> 07 January 1979	Photograph depicting human skeletal remains	E190.1.240 P 00407133-00407133	Photograph from Tuol Sleng Museum depicting local official with large pile of human skeletal remains at a makeshift memorial for victims of the DK regime.	VII. FACTUAL FINDINGS OF JOINT CRIMINAL ENTERPRISE [41:156 to 220], C. SECURITY CENTRES AND EXECUTION SITES [47:178 to 204], Widespread or Systematic [335:1352to1361]	This photograph cannot be accepted at face value as being authentic without, at a minimum, adducing evidence from the photographer. The photograph is unreliable and unsuitable to prove facts it purports to prove, and it is inadmissible pursuant to Rule 87(3)(c). Further, the photographer is not presently scheduled to testify in Case 002/01. Because Mr. IENG Sary has not been afforded his absolute right under Rule 84(1) to confront the photographer, this document is also inadmissible pursuant to Rule 87(3)(d). For further argument, <i>see</i> IENG Sary's Objections to the Admissibility of Certain Categories of Documents, 6 September 2011, E114, para. 1 (Standards for the admission of documentary evidence set by the Establishment Law), 7-9 (Reliability), 11 (Relevance), 18-19 (Reports, articles and non-contemporaneous documents).
287	Photograph	> 07 January 1979	Photograph depicting human skeletal remains	E190.1.278 P 00407159-00407159	Photograph from Tuol Sleng Museum depicting local villagers at the site of recently exhumed mass graves, with pile of human skeletal remains.	VII. FACTUAL FINDINGS OF JOINT CRIMINAL ENTERPRISE [41:156 to 220], C. SECURITY CENTRES AND EXECUTION SITES [47:178 to 204], Widespread or Systematic [335:1352to1361]	This photograph cannot be accepted at face value as being authentic without, at a minimum, adducing evidence from the photographer. The photograph is unreliable and unsuitable to prove facts it purports to prove, and it is inadmissible pursuant to Rule 87(3)(c). Further, the photographer is not presently scheduled to testify in Case 002/01. Because Mr. IENG Sary has not been afforded his absolute right under Rule 84(1) to confront the photographer, this document is also inadmissible pursuant to Rule 87(3)(d). For further argument, <i>see</i> IENG Sary's Objections to the Admissibility of Certain Categories of Documents, 6 September 2011, E114, para. 1 (Standards for the admission of documentary evidence set by the Establishment Law), 7-9 (Reliability), 11 (Relevance), 18-19 (Reports, articles and non-contemporaneous documents).
288	Photograph	> 07 January 1979	Photograph depicting human skeletal remains	E190.1.249 P 00407167-00407167	Photograph from Tuol Sleng Museum depicting local villagers arranging human skeletal remains on a memorial to victims of the DK regime.	VII. FACTUAL FINDINGS OF JOINT CRIMINAL ENTERPRISE [41:156 to 220], C. SECURITY CENTRES AND EXECUTION SITES [47:178 to 204], Widespread or Systematic [335:1352to1361]	This photograph cannot be accepted at face value as being authentic without, at a minimum, adducing evidence from the photographer. The photograph is unreliable and unsuitable to prove facts it purports to prove, and it is inadmissible pursuant to Rule 87(3)(c). Further, the photographer is not presently scheduled to testify in Case 002/01. Because Mr. IENG Sary has not been afforded his absolute right under Rule 84(1) to confront the photographer, this document is also inadmissible pursuant to Rule 87(3)(d). For further argument, <i>see</i> IENG Sary's Objections to the Admissibility of Certain Categories of Documents, 6 September 2011, E114, para. 1 (Standards for the admission of documentary evidence set by the Establishment Law), 7-9 (Reliability), 11 (Relevance), 18-19 (Reports, articles and non-contemporaneous documents).

289	Photograph	> 07 January 1979	Photograph depicting human skeletal remains	E190.1.257 P 00407163-00407163	Photograph from Tuol Sleng Museum depicting long pile of human skeletal remains at the site of a mass grave in the process of being exhumed.	VII. FACTUAL FINDINGS OF JOINT CRIMINAL ENTERPRISE [41:156 to 220], C. SECURITY CENTRES AND EXECUTION SITES [47:178 to 204], Widespread or Systematic [335:1352to1361]	This photograph cannot be accepted at face value as being authentic without, at a minimum, adducing evidence from the photographer. The photograph is unreliable and unsuitable to prove facts it purports to prove, and it is inadmissible pursuant to Rule 87(3)(c). Further, the photographer is not presently scheduled to testify in Case 002/01. Because Mr. IENG Sary has not been afforded his absolute right under Rule 84(1) to confront the photographer, this document is also inadmissible pursuant to Rule 87(3)(d). For further argument, <i>see</i> IENG Sary's Objections to the Admissibility of Certain Categories of Documents, 6 September 2011, E114, para. 1 (Standards for the admission of documentary evidence set by the Establishment Law), 7-9 (Reliability), 11 (Relevance), 18-19 (Reports, articles and non-contemporaneous documents).
290	Photograph	> 07 January 1979	Photograph depicting human skeletal remains	E190.1.263 P 00407175-00407175	Photograph from Tuol Sleng Museum depicting local villagers exhuming mass grave, with human skeletal remains visible in the grave.	VII. FACTUAL FINDINGS OF JOINT CRIMINAL ENTERPRISE [41:156 to 220], C. SECURITY CENTRES AND EXECUTION SITES [47:178 to 204], Widespread or Systematic [335:1352to1361]	This photograph cannot be accepted at face value as being authentic without, at a minimum, adducing evidence from the photographer. The photograph is unreliable and unsuitable to prove facts it purports to prove, and it is inadmissible pursuant to Rule 87(3)(c). Further, the photographer is not presently scheduled to testify in Case 002/01. Because Mr. IENG Sary has not been afforded his absolute right under Rule 84(1) to confront the photographer, this document is also inadmissible pursuant to Rule 87(3)(d). For further argument, <i>see</i> IENG Sary's Objections to the Admissibility of Certain Categories of Documents, 6 September 2011, E114, para. 1 (Standards for the admission of documentary evidence set by the Establishment Law), 7-9 (Reliability), 11 (Relevance), 18-19 (Reports, articles and non-contemporaneous documents).
291	Photograph	> 07 January 1979	Photograph depicting human skeletal remains	E190.1.210 P 00407113-00407113	Photographs from Tuol Sleng Museum depicting large pile of human skeletal remains in a makeshift memorial to victims of the DK regime.	VII. FACTUAL FINDINGS OF JOINT CRIMINAL ENTERPRISE [41:156 to 220], C. SECURITY CENTRES AND EXECUTION SITES [47:178 to 204], Widespread or Systematic [335:1352to1361]	This photograph cannot be accepted at face value as being authentic without, at a minimum, adducing evidence from the photographer. The photograph is unreliable and unsuitable to prove facts it purports to prove, and it is inadmissible pursuant to Rule 87(3)(c). Further, the photographer is not presently scheduled to testify in Case 002/01. Because Mr. IENG Sary has not been afforded his absolute right under Rule 84(1) to confront the photographer, this document is also inadmissible pursuant to Rule 87(3)(d). For further argument, <i>see</i> IENG Sary's Objections to the Admissibility of Certain Categories of Documents, 6 September 2011, E114, para. 1 (Standards for the admission of documentary evidence set by the Establishment Law), 7-9 (Reliability), 11 (Relevance), 18-19 (Reports, articles and non-contemporaneous documents).

292	Photograph	> 07 January 1979	Photograph depicting human skeletal remains	E190.1.260 P 00407180-00407180	Photograph from Tuol Sleng Museum depicting local villagers exhuming a mass grave, with human skeletal remains in the grave.	VII. FACTUAL FINDINGS OF JOINT CRIMINAL ENTERPRISE [41:156 to 220], C. SECURITY CENTRES AND EXECUTION SITES [47:178 to 204], Widespread or Systematic [335:1352to1361]	This photograph cannot be accepted at face value as being authentic without, at a minimum, adducing evidence from the photographer. The photograph is unreliable and unsuitable to prove facts it purports to prove, and it is inadmissible pursuant to Rule 87(3)(c). Further, the photographer is not presently scheduled to testify in Case 002/01. Because Mr. IENG Sary has not been afforded his absolute right under Rule 84(1) to confront the photographer, this document is also inadmissible pursuant to Rule 87(3)(d). For further argument, <i>see</i> IENG Sary's Objections to the Admissibility of Certain Categories of Documents, 6 September 2011, E114, para. 1 (Standards for the admission of documentary evidence set by the Establishment Law), 7-9 (Reliability), 11 (Relevance), 18-19 (Reports, articles and non-contemporaneous documents).
293	Photograph	> 07 January 1979	Photograph depicting human skeletal remains	E190.1.217 P 00407236-00407236	Photograph from Tuol Sleng Museum depicting human skeletal remains in a mass grave.	VII. FACTUAL FINDINGS OF JOINT CRIMINAL ENTERPRISE [41:156 to 220], C. SECURITY CENTRES AND EXECUTION SITES [47:178 to 204], Widespread or Systematic [335:1352to1361]	This photograph cannot be accepted at face value as being authentic without, at a minimum, adducing evidence from the photographer. The photograph is unreliable and unsuitable to prove facts it purports to prove, and it is inadmissible pursuant to Rule 87(3)(c). Further, the photographer is not presently scheduled to testify in Case 002/01. Because Mr. IENG Sary has not been afforded his absolute right under Rule 84(1) to confront the photographer, this document is also inadmissible pursuant to Rule 87(3)(d). For further argument, <i>see</i> IENG Sary's Objections to the Admissibility of Certain Categories of Documents, 6 September 2011, E114, para. 1 (Standards for the admission of documentary evidence set by the Establishment Law), 7-9 (Reliability), 11 (Relevance), 18-19 (Reports, articles and non-contemporaneous documents).
294	Photograph	> 07 January 1979	Photograph depicting human skeletal remains	E190.1.286 P 00407177-00407177	Photograph from Tuol Sleng Museum depicting human skeletal remains in a mass grave in the process of being exhumed.	VII. FACTUAL FINDINGS OF JOINT CRIMINAL ENTERPRISE [41:156 to 220], C. SECURITY CENTRES AND EXECUTION SITES [47:178 to 204], Widespread or Systematic [335:1352to1361]	This photograph cannot be accepted at face value as being authentic without, at a minimum, adducing evidence from the photographer. The photograph is unreliable and unsuitable to prove facts it purports to prove, and it is inadmissible pursuant to Rule 87(3)(c). Further, the photographer is not presently scheduled to testify in Case 002/01. Because Mr. IENG Sary has not been afforded his absolute right under Rule 84(1) to confront the photographer, this document is also inadmissible pursuant to Rule 87(3)(d). For further argument, <i>see</i> IENG Sary's Objections to the Admissibility of Certain Categories of Documents, 6 September 2011, E114, para. 1 (Standards for the admission of documentary evidence set by the Establishment Law), 7-9 (Reliability), 11 (Relevance), 18-19 (Reports, articles and non-contemporaneous documents).

295	Photograph	> 07 January 1979	Photograph depicting human skeletal remains	E190.1.272 P 00407190-00407190	Photograph from Tuol Sleng Museum depicting large collection of human skulls in a memorial to victims of the DK regime.	VII. FACTUAL FINDINGS OF JOINT CRIMINAL ENTERPRISE [41:156 to 220], C. SECURITY CENTRES AND EXECUTION SITES [47:178 to 204], Widespread or Systematic [335:1352to1361]	This photograph cannot be accepted at face value as being authentic without, at a minimum, adducing evidence from the photographer. The photograph is unreliable and unsuitable to prove facts it purports to prove, and it is inadmissible pursuant to Rule 87(3)(c). Further, the photographer is not presently scheduled to testify in Case 002/01. Because Mr. IENG Sary has not been afforded his absolute right under Rule 84(1) to confront the photographer, this document is also inadmissible pursuant to Rule 87(3)(d). For further argument, <i>see</i> IENG Sary's Objections to the Admissibility of Certain Categories of Documents, 6 September 2011, E114, para. 1 (Standards for the admission of documentary evidence set by the Establishment Law), 7-9 (Reliability), 11 (Relevance), 18-19 (Reports, articles and non-contemporaneous documents).
296	Photograph	> 07 January 1979	Photograph depicting human skeletal remains	E190.1.266 P 00407245-00407245	Photograph from Tuol Sleng Museum depicting human skeletal remains surrounding exhumed mass graves, showing bindings used to restrain prisoners and blindfolds.	VII. FACTUAL FINDINGS OF JOINT CRIMINAL ENTERPRISE [41:156 to 220], C. SECURITY CENTRES AND EXECUTION SITES [47:178 to 204], Widespread or Systematic [335:1352to1361]	This photograph cannot be accepted at face value as being authentic without, at a minimum, adducing evidence from the photographer. The photograph is unreliable and unsuitable to prove facts it purports to prove, and it is inadmissible pursuant to Rule 87(3)(c). Further, the photographer is not presently scheduled to testify in Case 002/01. Because Mr. IENG Sary has not been afforded his absolute right under Rule 84(1) to confront the photographer, this document is also inadmissible pursuant to Rule 87(3)(d). For further argument, <i>see</i> IENG Sary's Objections to the Admissibility of Certain Categories of Documents, 6 September 2011, E114, para. 1 (Standards for the admission of documentary evidence set by the Establishment Law), 7-9 (Reliability), 11 (Relevance), 18-19 (Reports, articles and non-contemporaneous documents).
297	Photograph	> 07 January 1979	Photograph depicting human skeletal remains	E190.1.246 P 00407189-00407189	Photograph from Tuol Sleng Museum depicting a pile of recently exhumed human skeletal remains, including clothing and hair.	VII. FACTUAL FINDINGS OF JOINT CRIMINAL ENTERPRISE [41:156 to 220], C. SECURITY CENTRES AND EXECUTION SITES [47:178 to 204], Widespread or Systematic [335:1352to1361]	This photograph cannot be accepted at face value as being authentic without, at a minimum, adducing evidence from the photographer. The photograph is unreliable and unsuitable to prove facts it purports to prove, and it is inadmissible pursuant to Rule 87(3)(c). Further, the photographer is not presently scheduled to testify in Case 002/01. Because Mr. IENG Sary has not been afforded his absolute right under Rule 84(1) to confront the photographer, this document is also inadmissible pursuant to Rule 87(3)(d). For further argument, <i>see</i> IENG Sary's Objections to the Admissibility of Certain Categories of Documents, 6 September 2011, E114, para. 1 (Standards for the admission of documentary evidence set by the Establishment Law), 7-9 (Reliability), 11 (Relevance), 18-19 (Reports, articles and non-contemporaneous documents).

298	Photograph	> 07 January 1979	Photograph depicting human skeletal remains	E190.1.235 P 00407181-00407181	Photograph from Tuol Sleng Museum depicting pile of human skeletal remains near a tree.	VII. FACTUAL FINDINGS OF JOINT CRIMINAL ENTERPRISE [41:156 to 220], C. SECURITY CENTRES AND EXECUTION SITES [47:178 to 204], Widespread or Systematic [335:1352to1361]	This photograph cannot be accepted at face value as being authentic without, at a minimum, adducing evidence from the photographer. The photograph is unreliable and unsuitable to prove facts it purports to prove, and it is inadmissible pursuant to Rule 87(3)(c). Further, the photographer is not presently scheduled to testify in Case 002/01. Because Mr. IENG Sary has not been afforded his absolute right under Rule 84(1) to confront the photographer, this document is also inadmissible pursuant to Rule 87(3)(d). For further argument, <i>see</i> IENG Sary's Objections to the Admissibility of Certain Categories of Documents, 6 September 2011, E114, para. 1 (Standards for the admission of documentary evidence set by the Establishment Law), 7-9 (Reliability), 11 (Relevance), 18-19 (Reports, articles and non-contemporaneous documents).
299	Photograph	> 07 January 1979	Photograph depicting human skeletal remains	E190.1.230 P 00407227-00407227	Photograph from Tuol Sleng Museum depicting a local villager in the process of exhuming a mass grave, with human skeletal remains visible in the mass grave.	VII. FACTUAL FINDINGS OF JOINT CRIMINAL ENTERPRISE [41:156 to 220], C. SECURITY CENTRES AND EXECUTION SITES [47:178 to 204], Widespread or Systematic [335:1352to1361]	This photograph cannot be accepted at face value as being authentic without, at a minimum, adducing evidence from the photographer. The photograph is unreliable and unsuitable to prove facts it purports to prove, and it is inadmissible pursuant to Rule 87(3)(c). Further, the photographer is not presently scheduled to testify in Case 002/01. Because Mr. IENG Sary has not been afforded his absolute right under Rule 84(1) to confront the photographer, this document is also inadmissible pursuant to Rule 87(3)(d). For further argument, <i>see</i> IENG Sary's Objections to the Admissibility of Certain Categories of Documents, 6 September 2011, E114, para. 1 (Standards for the admission of documentary evidence set by the Establishment Law), 7-9 (Reliability), 11 (Relevance), 18-19 (Reports, articles and non-contemporaneous documents).
300	Photograph	> 07 January 1979	Photograph depicting human skeletal remains	E190.1.215 P 00407240-00407240	Photograph from Tuol Sleng Museum depicting a local villager in the process of exhuming a mass grave, with human skeletal remains visible in the mass grave.	VII. FACTUAL FINDINGS OF JOINT CRIMINAL ENTERPRISE [41:156 to 220], C. SECURITY CENTRES AND EXECUTION SITES [47:178 to 204], Widespread or Systematic [335:1352to1361]	This photograph cannot be accepted at face value as being authentic without, at a minimum, adducing evidence from the photographer. The photograph is unreliable and unsuitable to prove facts it purports to prove, and it is inadmissible pursuant to Rule 87(3)(c). Further, the photographer is not presently scheduled to testify in Case 002/01. Because Mr. IENG Sary has not been afforded his absolute right under Rule 84(1) to confront the photographer, this document is also inadmissible pursuant to Rule 87(3)(d). For further argument, <i>see</i> IENG Sary's Objections to the Admissibility of Certain Categories of Documents, 6 September 2011, E114, para. 1 (Standards for the admission of documentary evidence set by the Establishment Law), 7-9 (Reliability), 11 (Relevance), 18-19 (Reports, articles and non-contemporaneous documents).

301	Photograph	> 07 January 1979	Photograph depicting human skeletal remains	E190.1.227 P 00407173-00407173	Photograph from Tuol Sleng Museum depicting human skeletal remains in a mass grave in the process of being exhumed.	VII. FACTUAL FINDINGS OF JOINT CRIMINAL ENTERPRISE [41:156 to 220], C. SECURITY CENTRES AND EXECUTION SITES [47:178 to 204], Widespread or Systematic [335:1352to1361]	This photograph cannot be accepted at face value as being authentic without, at a minimum, adducing evidence from the photographer. The photograph is unreliable and unsuitable to prove facts it purports to prove, and it is inadmissible pursuant to Rule 87(3)(c). Further, the photographer is not presently scheduled to testify in Case 002/01. Because Mr. IENG Sary has not been afforded his absolute right under Rule 84(1) to confront the photographer, this document is also inadmissible pursuant to Rule 87(3)(d). For further argument, <i>see</i> IENG Sary's Objections to the Admissibility of Certain Categories of Documents, 6 September 2011, E114, para. 1 (Standards for the admission of documentary evidence set by the Establishment Law), 7-9 (Reliability), 11 (Relevance), 18-19 (Reports, articles and non-contemporaneous documents).
302	Photograph	> 07 January 1979	Photograph depicting human skeletal remains	E190.1.253 P 00407122-00407122	Photograph from Tuol Sleng Museum depicting large collection of long bones and iron shackles ("knoah") in a makeshift memorial to victims of the DK regime.	VII. FACTUAL FINDINGS OF JOINT CRIMINAL ENTERPRISE [41:156 to 220], C. SECURITY CENTRES AND EXECUTION SITES [47:178 to 204], Widespread or Systematic [335:1352to1361]	This photograph cannot be accepted at face value as being authentic without, at a minimum, adducing evidence from the photographer. The photograph is unreliable and unsuitable to prove facts it purports to prove, and it is inadmissible pursuant to Rule 87(3)(c). Further, the photographer is not presently scheduled to testify in Case 002/01. Because Mr. IENG Sary has not been afforded his absolute right under Rule 84(1) to confront the photographer, this document is also inadmissible pursuant to Rule 87(3)(d). For further argument, <i>see</i> IENG Sary's Objections to the Admissibility of Certain Categories of Documents, 6 September 2011, E114, para. 1 (Standards for the admission of documentary evidence set by the Establishment Law), 7-9 (Reliability), 11 (Relevance), 18-19 (Reports, articles and non-contemporaneous documents).
303	Photograph	> 07 January 1979	Photograph depicting human skeletal remains	E190.1.208 P 00407226-00407226	Photograph from Tuol Sleng Museum depicting human skeletal remains in a mass grave in the process of being exhumed.	VII. FACTUAL FINDINGS OF JOINT CRIMINAL ENTERPRISE [41:156 to 220], C. SECURITY CENTRES AND EXECUTION SITES [47:178 to 204], Widespread or Systematic [335:1352to1361]	This photograph cannot be accepted at face value as being authentic without, at a minimum, adducing evidence from the photographer. The photograph is unreliable and unsuitable to prove facts it purports to prove, and it is inadmissible pursuant to Rule 87(3)(c). Further, the photographer is not presently scheduled to testify in Case 002/01. Because Mr. IENG Sary has not been afforded his absolute right under Rule 84(1) to confront the photographer, this document is also inadmissible pursuant to Rule 87(3)(d). For further argument, <i>see</i> IENG Sary's Objections to the Admissibility of Certain Categories of Documents, 6 September 2011, E114, para. 1 (Standards for the admission of documentary evidence set by the Establishment Law), 7-9 (Reliability), 11 (Relevance), 18-19 (Reports, articles and non-contemporaneous documents).

304	Photograph	> 07 January 1979	Photograph depicting human skeletal remains	E190.1.258 P 00407182-00407182	Photographs from Tuol Sleng Museum depicting human skeletal remains in a makeshift memorial to victims of the DK regime.	VII. FACTUAL FINDINGS OF JOINT CRIMINAL ENTERPRISE [41:156 to 220], C. SECURITY CENTRES AND EXECUTION SITES [47:178 to 204], Widespread or Systematic [335:1352to1361]	This photograph cannot be accepted at face value as being authentic without, at a minimum, adducing evidence from the photographer. The photograph is unreliable and unsuitable to prove facts it purports to prove, and it is inadmissible pursuant to Rule 87(3)(c). Further, the photographer is not presently scheduled to testify in Case 002/01. Because Mr. IENG Sary has not been afforded his absolute right under Rule 84(1) to confront the photographer, this document is also inadmissible pursuant to Rule 87(3)(d). For further argument, <i>see</i> IENG Sary's Objections to the Admissibility of Certain Categories of Documents, 6 September 2011, E114, para. 1 (Standards for the admission of documentary evidence set by the Establishment Law), 7-9 (Reliability), 11 (Relevance), 18-19 (Reports, articles and non-contemporaneous documents).
305	Photograph	> 07 January 1979	Photograph depicting human skeletal remains	E190.1.218 P 00407178-00407178	Photograph from Tuol Sleng Museum depicting local official indicating human skeletal remains in a mass grave in the process of being exhumed.	VII. FACTUAL FINDINGS OF JOINT CRIMINAL ENTERPRISE [41:156 to 220], C. SECURITY CENTRES AND EXECUTION SITES [47:178 to 204], Widespread or Systematic [335:1352to1361]	This photograph cannot be accepted at face value as being authentic without, at a minimum, adducing evidence from the photographer. The photograph is unreliable and unsuitable to prove facts it purports to prove, and it is inadmissible pursuant to Rule 87(3)(c). Further, the photographer is not presently scheduled to testify in Case 002/01. Because Mr. IENG Sary has not been afforded his absolute right under Rule 84(1) to confront the photographer, this document is also inadmissible pursuant to Rule 87(3)(d). For further argument, <i>see</i> IENG Sary's Objections to the Admissibility of Certain Categories of Documents, 6 September 2011, E114, para. 1 (Standards for the admission of documentary evidence set by the Establishment Law), 7-9 (Reliability), 11 (Relevance), 18-19 (Reports, articles and non-contemporaneous documents).
306	Photograph	> 07 January 1979	Photograph depicting human skeletal remains	E190.1.274 P 00407260-00407260	Photograph from Tuol Sleng Museum depicting human skeletal remains in a mass grave in the process of being exhumed.	VII. FACTUAL FINDINGS OF JOINT CRIMINAL ENTERPRISE [41:156 to 220], C. SECURITY CENTRES AND EXECUTION SITES [47:178 to 204], Widespread or Systematic [335:1352to1361]	This photograph cannot be accepted at face value as being authentic without, at a minimum, adducing evidence from the photographer. The photograph is unreliable and unsuitable to prove facts it purports to prove, and it is inadmissible pursuant to Rule 87(3)(c). Further, the photographer is not presently scheduled to testify in Case 002/01. Because Mr. IENG Sary has not been afforded his absolute right under Rule 84(1) to confront the photographer, this document is also inadmissible pursuant to Rule 87(3)(d). For further argument, <i>see</i> IENG Sary's Objections to the Admissibility of Certain Categories of Documents, 6 September 2011, E114, para. 1 (Standards for the admission of documentary evidence set by the Establishment Law), 7-9 (Reliability), 11 (Relevance), 18-19 (Reports, articles and non-contemporaneous documents).

307	Photograph	> 07 January 1979	Photograph depicting human skeletal remains	E190.1.205 P 00407158-00407158	Photograph from Tuol Sleng Museum depicting human skeletal remains in an exhumed mass grave.	VII. FACTUAL FINDINGS OF JOINT CRIMINAL ENTERPRISE [41:156 to 220], C. SECURITY CENTRES AND EXECUTION SITES [47:178 to 204], Widespread or Systematic [335:1352to1361]	This photograph cannot be accepted at face value as being authentic without, at a minimum, adducing evidence from the photographer. The photograph is unreliable and unsuitable to prove facts it purports to prove, and it is inadmissible pursuant to Rule 87(3)(c). Further, the photographer is not presently scheduled to testify in Case 002/01. Because Mr. IENG Sary has not been afforded his absolute right under Rule 84(1) to confront the photographer, this document is also inadmissible pursuant to Rule 87(3)(d). For further argument, <i>see</i> IENG Sary's Objections to the Admissibility of Certain Categories of Documents, 6 September 2011, E114, para. 1 (Standards for the admission of documentary evidence set by the Establishment Law), 7-9 (Reliability), 11 (Relevance), 18-19 (Reports, articles and non-contemporaneous documents).
308	Photograph	> 07 January 1979	Photograph depicting human skeletal remains	E190.1.222 P 00407157-00407157	Photograph from Tuol Sleng Museum depicting large pile of human skeletal remains in a makeshift memorial to victims of the DK regime.	VII. FACTUAL FINDINGS OF JOINT CRIMINAL ENTERPRISE [41:156 to 220], C. SECURITY CENTRES AND EXECUTION SITES [47:178 to 204], Widespread or Systematic [335:1352to1361]	This photograph cannot be accepted at face value as being authentic without, at a minimum, adducing evidence from the photographer. The photograph is unreliable and unsuitable to prove facts it purports to prove, and it is inadmissible pursuant to Rule 87(3)(c). Further, the photographer is not presently scheduled to testify in Case 002/01. Because Mr. IENG Sary has not been afforded his absolute right under Rule 84(1) to confront the photographer, this document is also inadmissible pursuant to Rule 87(3)(d). For further argument, <i>see</i> IENG Sary's Objections to the Admissibility of Certain Categories of Documents, 6 September 2011, E114, para. 1 (Standards for the admission of documentary evidence set by the Establishment Law), 7-9 (Reliability), 11 (Relevance), 18-19 (Reports, articles and non-contemporaneous documents).
309	Photograph	> 07 January 1979	Photograph depicting human skeletal remains	E190.1.225 P 00407179-00407179	Photograph from Tuol Sleng Museum depicting human skeletal remains piled in a makeshift memorial for victims of the DK regime.	VII. FACTUAL FINDINGS OF JOINT CRIMINAL ENTERPRISE [41:156 to 220], C. SECURITY CENTRES AND EXECUTION SITES [47:178 to 204], Widespread or Systematic [335:1352to1361]	This photograph cannot be accepted at face value as being authentic without, at a minimum, adducing evidence from the photographer. The photograph is unreliable and unsuitable to prove facts it purports to prove, and it is inadmissible pursuant to Rule 87(3)(c). Further, the photographer is not presently scheduled to testify in Case 002/01. Because Mr. IENG Sary has not been afforded his absolute right under Rule 84(1) to confront the photographer, this document is also inadmissible pursuant to Rule 87(3)(d). For further argument, <i>see</i> IENG Sary's Objections to the Admissibility of Certain Categories of Documents, 6 September 2011, E114, para. 1 (Standards for the admission of documentary evidence set by the Establishment Law), 7-9 (Reliability), 11 (Relevance), 18-19 (Reports, articles and non-contemporaneous documents).

310	Photograph	> 07 January 1979	Photograph depicting human skeletal remains	E190.1.220 P 00407114-00407114	Photograph from Tuol Sleng Museum depicting human skeletal remains piled in a makeshift memorial for victims of the DK regime.	VII. FACTUAL FINDINGS OF JOINT CRIMINAL ENTERPRISE [41:156 to 220], C. SECURITY CENTRES AND EXECUTION SITES [47:178 to 204], Widespread or Systematic [335:1352to1361]	This photograph cannot be accepted at face value as being authentic without, at a minimum, adducing evidence from the photographer. The photograph is unreliable and unsuitable to prove facts it purports to prove, and it is inadmissible pursuant to Rule 87(3)(c). Further, the photographer is not presently scheduled to testify in Case 002/01. Because Mr. IENG Sary has not been afforded his absolute right under Rule 84(1) to confront the photographer, this document is also inadmissible pursuant to Rule 87(3)(d). For further argument, <i>see</i> IENG Sary's Objections to the Admissibility of Certain Categories of Documents, 6 September 2011, E114, para. 1 (Standards for the admission of documentary evidence set by the Establishment Law), 7-9 (Reliability), 11 (Relevance), 18-19 (Reports, articles and non-contemporaneous documents).
311	Photograph	> 07 January 1979	Photograph depicting human skeletal remains	E190.1.255 P 00407186-00407186	Photograph from Tuol Sleng Museum depicting human skeletal remains scattered about the floor of a forest, with what appear to be parts of military uniforms.	VII. FACTUAL FINDINGS OF JOINT CRIMINAL ENTERPRISE [41:156 to 220], C. SECURITY CENTRES AND EXECUTION SITES [47:178 to 204], Widespread or Systematic [335:1352to1361]	This photograph cannot be accepted at face value as being authentic without, at a minimum, adducing evidence from the photographer. The photograph is unreliable and unsuitable to prove facts it purports to prove, and it is inadmissible pursuant to Rule 87(3)(c). Further, the photographer is not presently scheduled to testify in Case 002/01. Because Mr. IENG Sary has not been afforded his absolute right under Rule 84(1) to confront the photographer, this document is also inadmissible pursuant to Rule 87(3)(d). For further argument, <i>see</i> IENG Sary's Objections to the Admissibility of Certain Categories of Documents, 6 September 2011, E114, para. 1 (Standards for the admission of documentary evidence set by the Establishment Law), 7-9 (Reliability), 11 (Relevance), 18-19 (Reports, articles and non-contemporaneous documents).
312	Photograph	> 07 January 1979	Photograph depicting human skeletal remains	E190.1.213 P 00407148-00407148	Photograph from Tuol Sleng Museum depicting local villager examining a pile of human skeletal fragments near a recently exhumed mass grave.	VII. FACTUAL FINDINGS OF JOINT CRIMINAL ENTERPRISE [41:156 to 220], C. SECURITY CENTRES AND EXECUTION SITES [47:178 to 204], Widespread or Systematic [335:1352to1361]	This photograph cannot be accepted at face value as being authentic without, at a minimum, adducing evidence from the photographer. The photograph is unreliable and unsuitable to prove facts it purports to prove, and it is inadmissible pursuant to Rule 87(3)(c). Further, the photographer is not presently scheduled to testify in Case 002/01. Because Mr. IENG Sary has not been afforded his absolute right under Rule 84(1) to confront the photographer, this document is also inadmissible pursuant to Rule 87(3)(d). For further argument, <i>see</i> IENG Sary's Objections to the Admissibility of Certain Categories of Documents, 6 September 2011, E114, para. 1 (Standards for the admission of documentary evidence set by the Establishment Law), 7-9 (Reliability), 11 (Relevance), 18-19 (Reports, articles and non-contemporaneous documents).

313	Photograph	> 07 January 1979	Photograph depicting human skeletal remains	E190.1.269 P 00407166-00407166	Photograph from Tuol Sleng Museum depicting villagers and livestock near recently exhumed mass grave, with human skeletal remains.	VII. FACTUAL FINDINGS OF JOINT CRIMINAL ENTERPRISE [41:156 to 220], C. SECURITY CENTRES AND EXECUTION SITES [47:178 to 204], Widespread or Systematic [335:1352to1361]	This photograph cannot be accepted at face value as being authentic without, at a minimum, adducing evidence from the photographer. The photograph is unreliable and unsuitable to prove facts it purports to prove, and it is inadmissible pursuant to Rule 87(3)(c). Further, the photographer is not presently scheduled to testify in Case 002/01. Because Mr. IENG Sary has not been afforded his absolute right under Rule 84(1) to confront the photographer, this document is also inadmissible pursuant to Rule 87(3)(d). For further argument, <i>see</i> IENG Sary's Objections to the Admissibility of Certain Categories of Documents, 6 September 2011, E114, para. 1 (Standards for the admission of documentary evidence set by the Establishment Law), 7-9 (Reliability), 11 (Relevance), 18-19 (Reports, articles and non-contemporaneous documents).
314	Photograph	> 07 January 1979	Photograph depicting human skeletal remains	E190.1.221 P 00407134-00407134	Photograph from Tuol Sleng Museum depicting the recovery of human skeletal remains from a well where victims of the DK regime had been dumped.	VII. FACTUAL FINDINGS OF JOINT CRIMINAL ENTERPRISE [41:156 to 220], C. SECURITY CENTRES AND EXECUTION SITES [47:178 to 204], Widespread or Systematic [335:1352to1361]	This photograph cannot be accepted at face value as being authentic without, at a minimum, adducing evidence from the photographer. The photograph is unreliable and unsuitable to prove facts it purports to prove, and it is inadmissible pursuant to Rule 87(3)(c). Further, the photographer is not presently scheduled to testify in Case 002/01. Because Mr. IENG Sary has not been afforded his absolute right under Rule 84(1) to confront the photographer, this document is also inadmissible pursuant to Rule 87(3)(d). For further argument, <i>see</i> IENG Sary's Objections to the Admissibility of Certain Categories of Documents, 6 September 2011, E114, para. 1 (Standards for the admission of documentary evidence set by the Establishment Law), 7-9 (Reliability), 11 (Relevance), 18-19 (Reports, articles and non-contemporaneous documents).
315	Photograph	> 07 January 1979	Photograph depicting human skeletal remains	E190.1.239 P 00407185-00407185	Photograph from Tuol Sleng Museum depicting human skeletal remains scattered in a field.	VII. FACTUAL FINDINGS OF JOINT CRIMINAL ENTERPRISE [41:156 to 220], C. SECURITY CENTRES AND EXECUTION SITES [47:178 to 204], Widespread or Systematic [335:1352to1361]	This photograph cannot be accepted at face value as being authentic without, at a minimum, adducing evidence from the photographer. The photograph is unreliable and unsuitable to prove facts it purports to prove, and it is inadmissible pursuant to Rule 87(3)(c). Further, the photographer is not presently scheduled to testify in Case 002/01. Because Mr. IENG Sary has not been afforded his absolute right under Rule 84(1) to confront the photographer, this document is also inadmissible pursuant to Rule 87(3)(d). For further argument, <i>see</i> IENG Sary's Objections to the Admissibility of Certain Categories of Documents, 6 September 2011, E114, para. 1 (Standards for the admission of documentary evidence set by the Establishment Law), 7-9 (Reliability), 11 (Relevance), 18-19 (Reports, articles and non-contemporaneous documents).

316	Photograph	> 07 January 1979	Photograph depicting human skeletal remains	E190.1.207 P 00407224-00407224	Photograph from Tuol Sleng Museum depicting human skeletal remains in an exhumed mass grave.	VII. FACTUAL FINDINGS OF JOINT CRIMINAL ENTERPRISE [41:156 to 220], C. SECURITY CENTRES AND EXECUTION SITES [47:178 to 204], Widespread or Systematic [335:1352to1361]	This photograph cannot be accepted at face value as being authentic without, at a minimum, adducing evidence from the photographer. The photograph is unreliable and unsuitable to prove facts it purports to prove, and it is inadmissible pursuant to Rule 87(3)(c). Further, the photographer is not presently scheduled to testify in Case 002/01. Because Mr. IENG Sary has not been afforded his absolute right under Rule 84(1) to confront the photographer, this document is also inadmissible pursuant to Rule 87(3)(d). For further argument, <i>see</i> IENG Sary's Objections to the Admissibility of Certain Categories of Documents, 6 September 2011, E114, para. 1 (Standards for the admission of documentary evidence set by the Establishment Law), 7-9 (Reliability), 11 (Relevance), 18-19 (Reports, articles and non-contemporaneous documents).
317	Photograph	> 07 January 1979	Photograph depicting human skeletal remains	E190.1.261 P 00407170-00407170	Photograph from Tuol Sleng Museum depicting a local villager mourning at exhumed mass grave, amid human skeletal remains.	VII. FACTUAL FINDINGS OF JOINT CRIMINAL ENTERPRISE [41:156 to 220], C. SECURITY CENTRES AND EXECUTION SITES [47:178 to 204], Widespread or Systematic [335:1352to1361]	This photograph cannot be accepted at face value as being authentic without, at a minimum, adducing evidence from the photographer. The photograph is unreliable and unsuitable to prove facts it purports to prove, and it is inadmissible pursuant to Rule 87(3)(c). Further, the photographer is not presently scheduled to testify in Case 002/01. Because Mr. IENG Sary has not been afforded his absolute right under Rule 84(1) to confront the photographer, this document is also inadmissible pursuant to Rule 87(3)(d). For further argument, <i>see</i> IENG Sary's Objections to the Admissibility of Certain Categories of Documents, 6 September 2011, E114, para. 1 (Standards for the admission of documentary evidence set by the Establishment Law), 7-9 (Reliability), 11 (Relevance), 18-19 (Reports, articles and non-contemporaneous documents).
318	Photograph	> 07 January 1979	Photograph depicting human skeletal remains	E190.1.206 P 00407176-00407176	Photograph from Tuol Sleng Museum depicting human skeletal remains in an exhumed mass grave.	VII. FACTUAL FINDINGS OF JOINT CRIMINAL ENTERPRISE [41:156 to 220], C. SECURITY CENTRES AND EXECUTION SITES [47:178 to 204], Widespread or Systematic [335:1352to1361]	This photograph cannot be accepted at face value as being authentic without, at a minimum, adducing evidence from the photographer. The photograph is unreliable and unsuitable to prove facts it purports to prove, and it is inadmissible pursuant to Rule 87(3)(c). Further, the photographer is not presently scheduled to testify in Case 002/01. Because Mr. IENG Sary has not been afforded his absolute right under Rule 84(1) to confront the photographer, this document is also inadmissible pursuant to Rule 87(3)(d). For further argument, <i>see</i> IENG Sary's Objections to the Admissibility of Certain Categories of Documents, 6 September 2011, E114, para. 1 (Standards for the admission of documentary evidence set by the Establishment Law), 7-9 (Reliability), 11 (Relevance), 18-19 (Reports, articles and non-contemporaneous documents).

319	Photograph	> 07 January 1979	Photograph depicting human skeletal remains	E190.1.268 P 00407118-00407118	Photograph from Tuol Sleng Museum depicting human skeletal remains in a makeshift memorial to victims of the DK regime.	VII. FACTUAL FINDINGS OF JOINT CRIMINAL ENTERPRISE [41:156 to 220], C. SECURITY CENTRES AND EXECUTION SITES [47:178 to 204], Widespread or Systematic [335:1352to1361]	This photograph cannot be accepted at face value as being authentic without, at a minimum, adducing evidence from the photographer. The photograph is unreliable and unsuitable to prove facts it purports to prove, and it is inadmissible pursuant to Rule 87(3)(c). Further, the photographer is not presently scheduled to testify in Case 002/01. Because Mr. IENG Sary has not been afforded his absolute right under Rule 84(1) to confront the photographer, this document is also inadmissible pursuant to Rule 87(3)(d). For further argument, <i>see</i> IENG Sary's Objections to the Admissibility of Certain Categories of Documents, 6 September 2011, E114, para. 1 (Standards for the admission of documentary evidence set by the Establishment Law), 7-9 (Reliability), 11 (Relevance), 18-19 (Reports, articles and non-contemporaneous documents).
320	Photograph	> 07 January 1979	Photograph depicting human skeletal remains	E190.1.256 P 00407150-00407150	Photograph from Tuol Sleng Museum depicting a local villager at the site of a mass grave in the process of being exhumed.	VII. FACTUAL FINDINGS OF JOINT CRIMINAL ENTERPRISE [41:156 to 220], C. SECURITY CENTRES AND EXECUTION SITES [47:178 to 204], Widespread or Systematic [335:1352to1361]	This photograph cannot be accepted at face value as being authentic without, at a minimum, adducing evidence from the photographer. The photograph is unreliable and unsuitable to prove facts it purports to prove, and it is inadmissible pursuant to Rule 87(3)(c). Further, the photographer is not presently scheduled to testify in Case 002/01. Because Mr. IENG Sary has not been afforded his absolute right under Rule 84(1) to confront the photographer, this document is also inadmissible pursuant to Rule 87(3)(d). For further argument, <i>see</i> IENG Sary's Objections to the Admissibility of Certain Categories of Documents, 6 September 2011, E114, para. 1 (Standards for the admission of documentary evidence set by the Establishment Law), 7-9 (Reliability), 11 (Relevance), 18-19 (Reports, articles and non-contemporaneous documents).
321	Photograph	> 07 January 1979	Photograph depicting human skeletal remains	E190.1.283 P 00407225-00407225	Photographs from Tuol Sleng Museum depicting local villagers showing human skeletal remains in exhumed mass graves.	VII. FACTUAL FINDINGS OF JOINT CRIMINAL ENTERPRISE [41:156 to 220], C. SECURITY CENTRES AND EXECUTION SITES [47:178 to 204], Widespread or Systematic [335:1352to1361]	This photograph cannot be accepted at face value as being authentic without, at a minimum, adducing evidence from the photographer. The photograph is unreliable and unsuitable to prove facts it purports to prove, and it is inadmissible pursuant to Rule 87(3)(c). Further, the photographer is not presently scheduled to testify in Case 002/01. Because Mr. IENG Sary has not been afforded his absolute right under Rule 84(1) to confront the photographer, this document is also inadmissible pursuant to Rule 87(3)(d). For further argument, <i>see</i> IENG Sary's Objections to the Admissibility of Certain Categories of Documents, 6 September 2011, E114, para. 1 (Standards for the admission of documentary evidence set by the Establishment Law), 7-9 (Reliability), 11 (Relevance), 18-19 (Reports, articles and non-contemporaneous documents).

322	Photograph	> 07 January 1979	Photograph depicting human skeletal remains	E190.1.252 P 00407111-00407111	Photograph from Tuol Sleng Museum depicting human skeletal remains piled in a makeshift memorial for victims of the DK regime.	VII. FACTUAL FINDINGS OF JOINT CRIMINAL ENTERPRISE [41:156 to 220], C. SECURITY CENTRES AND EXECUTION SITES [47:178 to 204], Widespread or Systematic [335:1352to1361]	This photograph cannot be accepted at face value as being authentic without, at a minimum, adducing evidence from the photographer. The photograph is unreliable and unsuitable to prove facts it purports to prove, and it is inadmissible pursuant to Rule 87(3)(c). Further, the photographer is not presently scheduled to testify in Case 002/01. Because Mr. IENG Sary has not been afforded his absolute right under Rule 84(1) to confront the photographer, this document is also inadmissible pursuant to Rule 87(3)(d). For further argument, <i>see</i> IENG Sary's Objections to the Admissibility of Certain Categories of Documents, 6 September 2011, E114, para. 1 (Standards for the admission of documentary evidence set by the Establishment Law), 7-9 (Reliability), 11 (Relevance), 18-19 (Reports, articles and non-contemporaneous documents).
323	Photograph	> 07 January 1979	Photograph depicting human skeletal remains	E190.1.262 P 00407195-00407195	Photographs from Tuol Sleng Museum depicting human skeletal remains in a memorial to victims of the DK regime.	VII. FACTUAL FINDINGS OF JOINT CRIMINAL ENTERPRISE [41:156 to 220], C. SECURITY CENTRES AND EXECUTION SITES [47:178 to 204], Widespread or Systematic [335:1352to1361]	This photograph cannot be accepted at face value as being authentic without, at a minimum, adducing evidence from the photographer. The photograph is unreliable and unsuitable to prove facts it purports to prove, and it is inadmissible pursuant to Rule 87(3)(c). Further, the photographer is not presently scheduled to testify in Case 002/01. Because Mr. IENG Sary has not been afforded his absolute right under Rule 84(1) to confront the photographer, this document is also inadmissible pursuant to Rule 87(3)(d). For further argument, <i>see</i> IENG Sary's Objections to the Admissibility of Certain Categories of Documents, 6 September 2011, E114, para. 1 (Standards for the admission of documentary evidence set by the Establishment Law), 7-9 (Reliability), 11 (Relevance), 18-19 (Reports, articles and non-contemporaneous documents).
324	Photograph	> 07 January 1979	Photograph depicting human skeletal remains	E190.1.282 P 00407235-00407235	Photograph from Tuol Sleng Museum depicting local villagers and a soldier in the process of exhuming a mass grave.	VII. FACTUAL FINDINGS OF JOINT CRIMINAL ENTERPRISE [41:156 to 220], C. SECURITY CENTRES AND EXECUTION SITES [47:178 to 204], Widespread or Systematic [335:1352to1361]	This photograph cannot be accepted at face value as being authentic without, at a minimum, adducing evidence from the photographer. The photograph is unreliable and unsuitable to prove facts it purports to prove, and it is inadmissible pursuant to Rule 87(3)(c). Further, the photographer is not presently scheduled to testify in Case 002/01. Because Mr. IENG Sary has not been afforded his absolute right under Rule 84(1) to confront the photographer, this document is also inadmissible pursuant to Rule 87(3)(d). For further argument, <i>see</i> IENG Sary's Objections to the Admissibility of Certain Categories of Documents, 6 September 2011, E114, para. 1 (Standards for the admission of documentary evidence set by the Establishment Law), 7-9 (Reliability), 11 (Relevance), 18-19 (Reports, articles and non-contemporaneous documents).

325	Photograph	> 07 January 1979	Photograph depicting human skeletal remains	E190.1.231 P 00407234-00407234	Photograph from Tuol Sleng Museum depicting human skeletal remains scattered about the floor of a forest.	VII. FACTUAL FINDINGS OF JOINT CRIMINAL ENTERPRISE [41:156 to 220], C. SECURITY CENTRES AND EXECUTION SITES [47:178 to 204], Widespread or Systematic [335:1352to1361]	This photograph cannot be accepted at face value as being authentic without, at a minimum, adducing evidence from the photographer. The photograph is unreliable and unsuitable to prove facts it purports to prove, and it is inadmissible pursuant to Rule 87(3)(c). Further, the photographer is not presently scheduled to testify in Case 002/01. Because Mr. IENG Sary has not been afforded his absolute right under Rule 84(1) to confront the photographer, this document is also inadmissible pursuant to Rule 87(3)(d). For further argument, <i>see</i> IENG Sary's Objections to the Admissibility of Certain Categories of Documents, 6 September 2011, E114, para. 1 (Standards for the admission of documentary evidence set by the Establishment Law), 7-9 (Reliability), 11 (Relevance), 18-19 (Reports, articles and non-contemporaneous documents).
326	Photograph	> 07 January 1979	Photograph depicting human skeletal remains	E190.1.277 P 00407138-00407138	Photograph from Tuol Sleng Museum depicting a local villager recovering human skeletal remains from a well where victims were dumped.	VII. FACTUAL FINDINGS OF JOINT CRIMINAL ENTERPRISE [41:156 to 220], C. SECURITY CENTRES AND EXECUTION SITES [47:178 to 204], Widespread or Systematic [335:1352to1361]	This photograph cannot be accepted at face value as being authentic without, at a minimum, adducing evidence from the photographer. The photograph is unreliable and unsuitable to prove facts it purports to prove, and it is inadmissible pursuant to Rule 87(3)(c). Further, the photographer is not presently scheduled to testify in Case 002/01. Because Mr. IENG Sary has not been afforded his absolute right under Rule 84(1) to confront the photographer, this document is also inadmissible pursuant to Rule 87(3)(d). For further argument, <i>see</i> IENG Sary's Objections to the Admissibility of Certain Categories of Documents, 6 September 2011, E114, para. 1 (Standards for the admission of documentary evidence set by the Establishment Law), 7-9 (Reliability), 11 (Relevance), 18-19 (Reports, articles and non-contemporaneous documents).
327	Photograph	> 07 January 1979	Photograph depicting human skeletal remains	E190.1.273 P 00407243-00407243	Photograph from Tuol Sleng Museum depicting human skeletal remains in an exhumed mass grave, showing bindings used to restrain prisoners and blindfolds.	VII. FACTUAL FINDINGS OF JOINT CRIMINAL ENTERPRISE [41:156 to 220], C. SECURITY CENTRES AND EXECUTION SITES [47:178 to 204], Widespread or Systematic [335:1352to1361]	This photograph cannot be accepted at face value as being authentic without, at a minimum, adducing evidence from the photographer. The photograph is unreliable and unsuitable to prove facts it purports to prove, and it is inadmissible pursuant to Rule 87(3)(c). Further, the photographer is not presently scheduled to testify in Case 002/01. Because Mr. IENG Sary has not been afforded his absolute right under Rule 84(1) to confront the photographer, this document is also inadmissible pursuant to Rule 87(3)(d). For further argument, <i>see</i> IENG Sary's Objections to the Admissibility of Certain Categories of Documents, 6 September 2011, E114, para. 1 (Standards for the admission of documentary evidence set by the Establishment Law), 7-9 (Reliability), 11 (Relevance), 18-19 (Reports, articles and non-contemporaneous documents).

328	Photograph	> 07 January 1979	Photograph depicting human skeletal remains	E190.1.226 P 00407255-00407255	Photograph from Tuol Sleng Museum depicting human skeletal remains in an exhumed mass grave.	VII. FACTUAL FINDINGS OF JOINT CRIMINAL ENTERPRISE [41:156 to 220], C. SECURITY CENTRES AND EXECUTION SITES [47:178 to 204], Widespread or Systematic [335:1352to1361]	This photograph cannot be accepted at face value as being authentic without, at a minimum, adducing evidence from the photographer. The photograph is unreliable and unsuitable to prove facts it purports to prove, and it is inadmissible pursuant to Rule 87(3)(c). Further, the photographer is not presently scheduled to testify in Case 002/01. Because Mr. IENG Sary has not been afforded his absolute right under Rule 84(1) to confront the photographer, this document is also inadmissible pursuant to Rule 87(3)(d). For further argument, <i>see</i> IENG Sary's Objections to the Admissibility of Certain Categories of Documents, 6 September 2011, E114, para. 1 (Standards for the admission of documentary evidence set by the Establishment Law), 7-9 (Reliability), 11 (Relevance), 18-19 (Reports, articles and non-contemporaneous documents).
329	Photograph	> 07 January 1979	Photograph depicting kiln used as mass grave	E190.1.287 P 00407116-00407116	Photograph from Tuol Sleng Museum depicting PRK investigators examining a kiln where victims of the DK regime were allegedly incinerated.	VII. FACTUAL FINDINGS OF JOINT CRIMINAL ENTERPRISE [41:156 to 220], C. SECURITY CENTRES AND EXECUTION SITES [47:178 to 204], Widespread or Systematic [335:1352to1361]	This photograph cannot be accepted at face value as being authentic without, at a minimum, adducing evidence from the photographer. The photograph is unreliable and unsuitable to prove facts it purports to prove, and it is inadmissible pursuant to Rule 87(3)(c). Further, the photographer is not presently scheduled to testify in Case 002/01. Because Mr. IENG Sary has not been afforded his absolute right under Rule 84(1) to confront the photographer, this document is also inadmissible pursuant to Rule 87(3)(d). For further argument, <i>see</i> IENG Sary's Objections to the Admissibility of Certain Categories of Documents, 6 September 2011, E114, para. 1 (Standards for the admission of documentary evidence set by the Establishment Law), 7-9 (Reliability), 11 (Relevance), 18-19 (Reports, articles and non-contemporaneous documents).
330	Photograph	> 07 January 1979	Photograph depicting well used as mass grave	E190.1.291 P 00407141-00407141	Photograph from Tuol Sleng Museum depicting well in which victims of DK regime were dumped.	VII. FACTUAL FINDINGS OF JOINT CRIMINAL ENTERPRISE [41:156 to 220], C. SECURITY CENTRES AND EXECUTION SITES [47:178 to 204], Widespread or Systematic [335:1352to1361]	This photograph cannot be accepted at face value as being authentic without, at a minimum, adducing evidence from the photographer. The photograph is unreliable and unsuitable to prove facts it purports to prove, and it is inadmissible pursuant to Rule 87(3)(c). Further, the photographer is not presently scheduled to testify in Case 002/01. Because Mr. IENG Sary has not been afforded his absolute right under Rule 84(1) to confront the photographer, this document is also inadmissible pursuant to Rule 87(3)(d). For further argument, <i>see</i> IENG Sary's Objections to the Admissibility of Certain Categories of Documents, 6 September 2011, E114, para. 1 (Standards for the admission of documentary evidence set by the Establishment Law), 7-9 (Reliability), 11 (Relevance), 18-19 (Reports, articles and non-contemporaneous documents).

331	Photograph	> 07 January 1979	Photograph depicting well used as mass grave	E190.1.294 P 00407136-00407136	Photograph from Tuol Sleng Museum depicting a well where victims of the DK regime had been dumped.	VII. FACTUAL FINDINGS OF JOINT CRIMINAL ENTERPRISE [41:156 to 220], C. SECURITY CENTRES AND EXECUTION SITES [47:178 to 204], Widespread or Systematic [335:1352to1361]	This photograph cannot be accepted at face value as being authentic without, at a minimum, adducing evidence from the photographer. The photograph is unreliable and unsuitable to prove facts it purports to prove, and it is inadmissible pursuant to Rule 87(3)(c). Further, the photographer is not presently scheduled to testify in Case 002/01. Because Mr. IENG Sary has not been afforded his absolute right under Rule 84(1) to confront the photographer, this document is also inadmissible pursuant to Rule 87(3)(d). For further argument, <i>see</i> IENG Sary's Objections to the Admissibility of Certain Categories of Documents, 6 September 2011, E114, para. 1 (Standards for the admission of documentary evidence set by the Establishment Law), 7-9 (Reliability), 11 (Relevance), 18-19 (Reports, articles and non-contemporaneous documents).
332	Photograph	> 07 January 1979	Photograph depicting well used as mass grave	E190.1.289 P 00407171-00407171	Photograph from Tuol Sleng Museum depicting the recovery of human skeletal remains from a well where victims of the DK regime had been dumped.	VII. FACTUAL FINDINGS OF JOINT CRIMINAL ENTERPRISE [41:156 to 220], C. SECURITY CENTRES AND EXECUTION SITES [47:178 to 204], Widespread or Systematic [335:1352to1361]	This photograph cannot be accepted at face value as being authentic without, at a minimum, adducing evidence from the photographer. The photograph is unreliable and unsuitable to prove facts it purports to prove, and it is inadmissible pursuant to Rule 87(3)(c). Further, the photographer is not presently scheduled to testify in Case 002/01. Because Mr. IENG Sary has not been afforded his absolute right under Rule 84(1) to confront the photographer, this document is also inadmissible pursuant to Rule 87(3)(d). For further argument, <i>see</i> IENG Sary's Objections to the Admissibility of Certain Categories of Documents, 6 September 2011, E114, para. 1 (Standards for the admission of documentary evidence set by the Establishment Law), 7-9 (Reliability), 11 (Relevance), 18-19 (Reports, articles and non-contemporaneous documents).
333	Photograph	> 07 January 1979	Photograph depicting well used as mass grave	E190.1.292 P 00407135-00407135	Photograph from Tuol Sleng Museum depicting the recovery of human skeletal remains from a well where victims of the DK regime had been dumped.	VII. FACTUAL FINDINGS OF JOINT CRIMINAL ENTERPRISE [41:156 to 220], C. SECURITY CENTRES AND EXECUTION SITES [47:178 to 204], Widespread or Systematic [335:1352to1361]	This photograph cannot be accepted at face value as being authentic without, at a minimum, adducing evidence from the photographer. The photograph is unreliable and unsuitable to prove facts it purports to prove, and it is inadmissible pursuant to Rule 87(3)(c). Further, the photographer is not presently scheduled to testify in Case 002/01. Because Mr. IENG Sary has not been afforded his absolute right under Rule 84(1) to confront the photographer, this document is also inadmissible pursuant to Rule 87(3)(d). For further argument, <i>see</i> IENG Sary's Objections to the Admissibility of Certain Categories of Documents, 6 September 2011, E114, para. 1 (Standards for the admission of documentary evidence set by the Establishment Law), 7-9 (Reliability), 11 (Relevance), 18-19 (Reports, articles and non-contemporaneous documents).

334	Photograph	> 07 January 1979	Photograph depicting well used as mass grave	E190.1.293 P 00407140-00407140	Photograph from Tuol Sleng Museum depicting the recovery of human skeletal remains from a well where victims of the DK regime had been dumped.	VII. FACTUAL FINDINGS OF JOINT CRIMINAL ENTERPRISE [41:156 to 220], C. SECURITY CENTRES AND EXECUTION SITES [47:178 to 204], Widespread or Systematic [335:1352to1361]	This photograph cannot be accepted at face value as being authentic without, at a minimum, adducing evidence from the photographer. The photograph is unreliable and unsuitable to prove facts it purports to prove, and it is inadmissible pursuant to Rule 87(3)(c). Further, the photographer is not presently scheduled to testify in Case 002/01. Because Mr. IENG Sary has not been afforded his absolute right under Rule 84(1) to confront the photographer, this document is also inadmissible pursuant to Rule 87(3)(d). For further argument, <i>see</i> IENG Sary's Objections to the Admissibility of Certain Categories of Documents, 6 September 2011, E114, para. 1 (Standards for the admission of documentary evidence set by the Establishment Law), 7-9 (Reliability), 11 (Relevance), 18-19 (Reports, articles and non-contemporaneous documents).
335	Photograph	> 07 January 1979	Photograph depicting well used as mass grave	E190.1.288 P 00407139-00407139	Photograph from Tuol Sleng Museum depicting a well where victims of the DK regime were dumped.	VII. FACTUAL FINDINGS OF JOINT CRIMINAL ENTERPRISE [41:156 to 220], C. SECURITY CENTRES AND EXECUTION SITES [47:178 to 204], Widespread or Systematic [335:1352to1361]	This photograph cannot be accepted at face value as being authentic without, at a minimum, adducing evidence from the photographer. The photograph is unreliable and unsuitable to prove facts it purports to prove, and it is inadmissible pursuant to Rule 87(3)(c). Further, the photographer is not presently scheduled to testify in Case 002/01. Because Mr. IENG Sary has not been afforded his absolute right under Rule 84(1) to confront the photographer, this document is also inadmissible pursuant to Rule 87(3)(d). For further argument, <i>see</i> IENG Sary's Objections to the Admissibility of Certain Categories of Documents, 6 September 2011, E114, para. 1 (Standards for the admission of documentary evidence set by the Establishment Law), 7-9 (Reliability), 11 (Relevance), 18-19 (Reports, articles and non-contemporaneous documents).
336	Photograph	> 07 January 1979	Photograph depicting well used as mass grave	E190.1.290 P 00407147-00407147	Photograph from Tuol Sleng Museum depicting a well where victims of the DK regime were dumped.	VII. FACTUAL FINDINGS OF JOINT CRIMINAL ENTERPRISE [41:156 to 220], C. SECURITY CENTRES AND EXECUTION SITES [47:178 to 204], Widespread or Systematic [335:1352to1361]	This photograph cannot be accepted at face value as being authentic without, at a minimum, adducing evidence from the photographer. The photograph is unreliable and unsuitable to prove facts it purports to prove, and it is inadmissible pursuant to Rule 87(3)(c). Further, the photographer is not presently scheduled to testify in Case 002/01. Because Mr. IENG Sary has not been afforded his absolute right under Rule 84(1) to confront the photographer, this document is also inadmissible pursuant to Rule 87(3)(d). For further argument, <i>see</i> IENG Sary's Objections to the Admissibility of Certain Categories of Documents, 6 September 2011, E114, para. 1 (Standards for the admission of documentary evidence set by the Establishment Law), 7-9 (Reliability), 11 (Relevance), 18-19 (Reports, articles and non-contemporaneous documents).

337	Photograph	> 07 January 1979	Photograph depicting well used as mass grave	E190.1.295 P 00407172-00407172	Photograph from Tuol Sleng Museum depicting the recovery of human skeletal remains from a well where victims of the DK regime had been dumped.	VII. FACTUAL FINDINGS OF JOINT CRIMINAL ENTERPRISE [41:156 to 220], C. SECURITY CENTRES AND EXECUTION SITES [47:178 to 204], Widespread or Systematic [335:1352to1361]	This photograph cannot be accepted at face value as being authentic without, at a minimum, adducing evidence from the photographer. The photograph is unreliable and unsuitable to prove facts it purports to prove, and it is inadmissible pursuant to Rule 87(3)(c). Further, the photographer is not presently scheduled to testify in Case 002/01. Because Mr. IENG Sary has not been afforded his absolute right under Rule 84(1) to confront the photographer, this document is also inadmissible pursuant to Rule 87(3)(d). For further argument, <i>see</i> IENG Sary's Objections to the Admissibility of Certain Categories of Documents, 6 September 2011, E114, para. 1 (Standards for the admission of documentary evidence set by the Establishment Law), 7-9 (Reliability), 11 (Relevance), 18-19 (Reports, articles and non-contemporaneous documents).
338	Photograph	> 07 January 1979	Photographs depicting kiln used as mass grave	E190.1.296 P 00407208-00407208	Photographs from Tuol Sleng Museum depicting a kiln in which the remains of victims of the DK regime were allegedly burnt.	VII. FACTUAL FINDINGS OF JOINT CRIMINAL ENTERPRISE [41:156 to 220], C. SECURITY CENTRES AND EXECUTION SITES [47:178 to 204], Widespread or Systematic [335:1352to1361]	This photograph cannot be accepted at face value as being authentic without, at a minimum, adducing evidence from the photographer. The photograph is unreliable and unsuitable to prove facts it purports to prove, and it is inadmissible pursuant to Rule 87(3)(c). Further, the photographer is not presently scheduled to testify in Case 002/01. Because Mr. IENG Sary has not been afforded his absolute right under Rule 84(1) to confront the photographer, this document is also inadmissible pursuant to Rule 87(3)(d). For further argument, <i>see</i> IENG Sary's Objections to the Admissibility of Certain Categories of Documents, 6 September 2011, E114, para. 1 (Standards for the admission of documentary evidence set by the Establishment Law), 7-9 (Reliability), 11 (Relevance), 18-19 (Reports, articles and non-contemporaneous documents).
339	S-21 Confession	Date not specified in document	S-21 Confession of NHIM Chhon alias HANG	E190.1.29	Confession of Sector 41 Deputy Chief of Security.	Purge of the Old and New North Zones [52:193 to 198], S-21 Security Centre [108:415 to 475], Arrests and detentions [110:423 to 472], Composition of the Incarcerated Population [110:423 to 433], Interrogations [115:448 to 456]	This document contains a confession. Confessions are torture-tainted material. Torture-tainted material is, under all its forms and in every circumstance (except against a person accused of torture as evidence that a statement was made), inadmissible in judicial proceedings before the ECCC. All preliminary biographical information and other derivative evidence contained in this document derived from torture-tainted material and is inadmissible. Torture-tainted material is not allowed under the law and it is inherently unreliable. The Trial Chamber must reject this document pursuant to Rule 87(3)(d). <i>See</i> Decision on Objections to Documents Proposed to be put before the Chamber on the Co-Prosecutors' Annexes A1-A5 and to Documents Cited in the Paragraphs of the Closing Order Relevant to the First Two Trial Segments of Case 002/01, 9 April 2012, E185, para. 21.

340	S-21 Confession	13 September 1975	S-21 Confession of LANG Pring alias LANG Phat	E190.1.25	Confession of a former worker of K-5 factory and former Khmer Republic captain. Contains annotations indicating torture.	VII. FACTUAL FINDINGS OF JOINT CRIMINAL ENTERPRISE [41:156 to 220], D. TREATMENT OF TARGETED GROUPS [55:205 to 215], S-21 Security Centre [108:415 to 475], Arrests and detentions [110:423 to 472], Composition of the Incarcerated Population [110:423 to 433], Interrogations [115:448 to 456]	<p>This document contains a confession. Confessions are torture-tainted material. Torture-tainted material is, under all its forms and in every circumstance (except against a person accused of torture as evidence that a statement was made), inadmissible in judicial proceedings before the ECCC. All preliminary biographical information and other derivative evidence contained in this document derived from torture-tainted material and is inadmissible. Torture-tainted material is not allowed under the law and it is inherently unreliable. The Trial Chamber must reject this document pursuant to Rule 87(3)(d). <i>See</i> Decision on Objections to Documents Proposed to be put before the Chamber on the Co-Prosecutors' Annexes A1-A5 and to Documents Cited in the Paragraphs of the Closing Order Relevant to the First Two Trial Segments of Case 002/01, 9 April 2012, E185, para. 21.</p> <p>This document is not an actual translation, but is a summary and analysis of a confession prepared by DC-Cam. The summary was made by an organization the Defence considers biased. The person at DC-Cam who prepared the summary is not named. The summary contains the preparer's own interpretations and conclusions, rather than simply the text of the confession itself. For example: "We have already seen such a style of notes on many documents..." This document must not be admitted since Mr. IENG Sary has had no opportunity to confront the preparer. The preparer's interpretations amount to witness statements collected by an entity external to the ECCC. They therefore enjoy no presumption of reliability (E96/7, para. 29).</p> <p>Finally, this document is only available in English. Unless it is made available in Khmer and French by 4 March 2013, it cannot be considered to have been put before the Chamber (pursuant to E185/1, para. 16, E246/1).</p>
341	S-21 Confession	26 September 1976	S-21 Confession of MEN San alias NEY Saran alias Ya (9th)	E190.1.28	Confession of former secretary of Northeast Zone. Contains annotations indicating torture.	VII. FACTUAL FINDINGS OF JOINT CRIMINAL ENTERPRISE [41:156 to 220], C. SECURITY CENTRES AND EXECUTION SITES [47:178 to 204], "Purges" [52:192 to 204], S-21 Security Centre [108:415 to 475], Arrests and detentions [110:423 to 472], Composition of the Incarcerated Population [110:423 to 433], Interrogations [115:448 to 456]	<p>This document contains a confession. Confessions are torture-tainted material. Torture-tainted material is, under all its forms and in every circumstance (except against a person accused of torture as evidence that a statement was made), inadmissible in judicial proceedings before the ECCC. All preliminary biographical information and other derivative evidence contained in this document derived from torture-tainted material and is inadmissible. Torture-tainted material is not allowed under the law and it is inherently unreliable. The Trial Chamber must reject this document pursuant to Rule 87(3)(d). <i>See</i> Decision on Objections to Documents Proposed to be put before the Chamber on the Co-Prosecutors' Annexes A1-A5 and to Documents Cited in the Paragraphs of the Closing Order Relevant to the First Two Trial Segments of Case 002/01, 9 April 2012, E185, para. 21.</p>

342	S-21 Confession	01 November 1976	S-21 Confession of CHEY Suon alias SAEN alias NON Suon	E190.1.14	Confession of former Minister of Agriculture, containing annotations by KAING Guek Eav alias Duch and KAING Guek Eav alias Duch's correspondence with the prisoner; also contains a note by HOEUNG Song Huor alias Pon stating that "Your detention was decided on by the Standing Committee of the Party Centre".	C. STANDING COMMITTEE [18:41 to 47], E. MINISTRIES (GOVERNMENT) OF DEMOCRATIC KAMPUCHEA [23:62 to 63], VII. FACTUAL FINDINGS OF JOINT CRIMINAL ENTERPRISE [41:156 to 220], C. SECURITY CENTRES AND EXECUTION SITES [47:178 to 204], S-21 Security Centre [108:415 to 475], Arrests and detentions [110:423 to 472], Composition of the Incarcerated Population [110:423 to 433], Interrogations [115:448 to 456], A. NUON CHEA [214:862 to 993], Security Centres and Execution Sites [228:916 to 974], Role in the Arrest of Centre Party and Centre Offices Cadres (Political Office 870 and Office S-71) [236:943 to 944], Involvement in the Process of Arrest and Transfer to S-21 [241:958 to 962], B. IENG SARY [250:994 to 1125], Participation in the Common Purpose [255:1018 to 1121], Security Centres and Execution Sites [262:1048 to 1104], Knowledge and Implementation of this Policy Generally [265:1061 to 1066]	This document contains a confession. Confessions are torture-tainted material. Torture-tainted material is, under all its forms and in every circumstance (except against a person accused of torture as evidence that a statement was made), inadmissible in judicial proceedings before the ECCC. All preliminary biographical information and other derivative evidence contained in this document derived from torture-tainted material and is inadmissible. Torture-tainted material is not allowed under the law and it is inherently unreliable. The Trial Chamber must reject this document pursuant to Rule 87(3)(d). <i>See</i> Decision on Objections to Documents Proposed to be put before the Chamber on the Co-Prosecutors' Annexes A1-A5 and to Documents Cited in the Paragraphs of the Closing Order Relevant to the First Two Trial Segments of Case 002/01, 9 April 2012, E185, para. 21.
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343	S-21 Confession	09 October 1977	S-21 Confession of TUOT Reth	E190.1.38	Confession of Chief of Compost Mixing Group in Sector 5. Contains annotation indicating that confession was sent to "Brother", likely NUON Chea.	S-21 Security Centre [108:415 to 475], Arrests and detentions [110:423 to 472], Composition of the Incarcerated Population [110:423 to 433], Interrogations [115:448 to 456], A. NUON CHEA [214:862 to 993], Participation in The Common Purpose [222:895 to 992], Security Centres and Execution Sites [228:916 to 974], S-21 Confessions [242:963 to 967]	<p>This document contains a confession. Confessions are torture-tainted material. Torture-tainted material is, under all its forms and in every circumstance (except against a person accused of torture as evidence that a statement was made), inadmissible in judicial proceedings before the ECCC. All preliminary biographical information and other derivative evidence contained in this document derived from torture-tainted material and is inadmissible. Torture-tainted material is not allowed under the law and it is inherently unreliable. The Trial Chamber must reject this document pursuant to Rule 87(3)(d). <i>See</i> Decision on Objections to Documents Proposed to be put before the Chamber on the Co-Prosecutors' Annexes A1-A5 and to Documents Cited in the Paragraphs of the Closing Order Relevant to the First Two Trial Segments of Case 002/01, 9 April 2012, E185, para. 21.</p> <p>This document is not an actual translation, but is a summary and analysis of a confession prepared by DC-Cam. The summary was made by an organization the Defence considers biased. The person at DC-Cam who prepared the summary is not named. The summary contains the preparer's own interpretations and conclusions, rather than simply the text of the confession itself. This document must not be admitted since Mr. IENG Sary has had no opportunity to confront the preparer. The preparer's interpretations amount to witness statements collected by an entity external to the ECCC. They therefore enjoy no presumption of reliability (E96/7, para. 29).</p>
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344	S-21 Confession	21 April 1977	S-21 Confession of KUN THON Thanarak alias Penh	E190.1.24	Confession of a combatant in Printing House K-25. Contains annotation of NUON Chea and an annotation indicating confession was sent to IENG Sary alias Van.	VII. FACTUAL FINDINGS OF JOINT CRIMINAL ENTERPRISE [41:156 to 220], C. SECURITY CENTRES AND EXECUTION SITES [47:178 to 204], S-21 Security Centre [108:415 to 475], Arrests and detentions [110:423 to 472], Composition of the Incarcerated Population [110:423 to 433], Interrogations [115:448 to 456], A. NUON CHEA [214:862 to 993], Participation in The Common Purpose [222:895 to 992], Security Centres and Execution Sites [228:916 to 974], S-21 Confessions [242:963 to 967], B. IENG SARY [250:994 to 1125], Participation in the Common Purpose [255:1018 to 1121], Security Centres and Execution Sites [262:1048 to 1104], Knowledge and Implementation of this Policy at S-21 [267:1067 to 1068]	<p>This document contains a confession. Confessions are torture-tainted material. Torture-tainted material is, under all its forms and in every circumstance (except against a person accused of torture as evidence that a statement was made), inadmissible in judicial proceedings before the ECCC. All preliminary biographical information and other derivative evidence contained in this document derived from torture-tainted material and is inadmissible. Torture-tainted material is not allowed under the law and it is inherently unreliable. The Trial Chamber must reject this document pursuant to Rule 87(3)(d). <i>See</i> Decision on Objections to Documents Proposed to be put before the Chamber on the Co-Prosecutors' Annexes A1-A5 and to Documents Cited in the Paragraphs of the Closing Order Relevant to the First Two Trial Segments of Case 002/01, 9 April 2012, E185, para. 21.</p> <p>This document is not an actual translation, but is a summary and analysis of a confession prepared by DC-Cam. The summary was made by an organization the Defence considers biased. The person at DC-Cam who prepared the summary is not named. The summary contains the preparer's own interpretations and conclusions, rather than simply the text of the confession itself. For example: "These notes were (presumably) written by Nuon Chea." This document must not be admitted since Mr. IENG Sary has had no opportunity to confront the preparer. The preparer's interpretations amount to witness statements collected by an entity external to the ECCC. They therefore enjoy no presumption of reliability (E96/7, para. 29).</p>
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345	S-21 Confession	24 April 1977	S-21 Confession of TEP Kap	E190.1.37	Confession of a cadre from Sector 31, West Zone. Contains annotations attributed to NUON Chea.	S-21 Security Centre [108:415 to 475], Arrests and detentions [110:423 to 472], Composition of the Incarcerated Population [110:423 to 433], Interrogations [115:448 to 456], A. NUON CHEA [214:862 to 993], Participation in The Common Purpose [222:895 to 992], Security Centres and Execution Sites [228:916 to 974], Knowledge and Implementation of this Policy at S-21 [238:949 to 974], S-21 Confessions [242:963 to 967], Interrogation at S-21 [244:968 to 969]	<p>This document contains a confession. Confessions are torture-tainted material. Torture-tainted material is, under all its forms and in every circumstance (except against a person accused of torture as evidence that a statement was made), inadmissible in judicial proceedings before the ECCC. All preliminary biographical information and other derivative evidence contained in this document derived from torture-tainted material and is inadmissible. Torture-tainted material is not allowed under the law and it is inherently unreliable. The Trial Chamber must reject this document pursuant to Rule 87(3)(d). <i>See</i> Decision on Objections to Documents Proposed to be put before the Chamber on the Co-Prosecutors' Annexes A1-A5 and to Documents Cited in the Paragraphs of the Closing Order Relevant to the First Two Trial Segments of Case 002/01, 9 April 2012, E185, para. 21.</p> <p>This document is not an actual translation, but is a summary and analysis of a confession prepared by DC-Cam. The summary was made by an organization the Defence considers biased. The person at DC-Cam who prepared the summary is not named. The summary contains the preparer's own interpretations and conclusions, rather than simply the text of the confession itself. For example: "Tep Kap might have been forced into a confession, based on the fact that..." This document must not be admitted since Mr. IENG Sary has had no opportunity to confront the preparer. The preparer's interpretations amount to witness statements collected by an entity external to the ECCC. They therefore enjoy no presumption of reliability (E96/7, para. 29).</p>
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346	S-21 Confession	24 April 1977	S-21 Confession of YANG Pov	E190.1.42	Confession of Security Chairman of Sector 106. Contains annotations by NUON Chea and indicating confession sent to KE Pauk.	Purge of the Old and New North Zones [52:193 to 198], S-21 Security Centre [108:415 to 475], Arrests and detentions [110:423 to 472], Composition of the Incarcerated Population [110:423 to 433], Interrogations [115:448 to 456], A. NUON CHEA [214:862 to 993], Participation in The Common Purpose [222:895 to 992], Security Centres and Execution Sites [228:916 to 974], Role in the purges in the Central (Old North) Zone and Sector 106 [234:936], Knowledge and Implementation of this Policy at S-2I [238:949 to 974], S-21 Confessions [242:963 to 967]	<p>This document contains a confession. Confessions are torture-tainted material. Torture-tainted material is, under all its forms and in every circumstance (except against a person accused of torture as evidence that a statement was made), inadmissible in judicial proceedings before the ECCC. All preliminary biographical information and other derivative evidence contained in this document derived from torture-tainted material and is inadmissible. Torture-tainted material is not allowed under the law and it is inherently unreliable. The Trial Chamber must reject this document pursuant to Rule 87(3)(d). <i>See</i> Decision on Objections to Documents Proposed to be put before the Chamber on the Co-Prosecutors' Annexes A1-A5 and to Documents Cited in the Paragraphs of the Closing Order Relevant to the First Two Trial Segments of Case 002/01, 9 April 2012, E185, para. 21.</p> <p>This document is not an actual translation, but is a summary and analysis of a confession prepared by DC-Cam. The summary was made by an organization the Defence considers biased. The person at DC-Cam who prepared the summary is not named. The summary contains the preparer's own interpretations and conclusions, rather than simply the text of the confession itself. For example: "For legal matter, the document is worth analyzing because..." This document must not be admitted since Mr. IENG Sary has had no opportunity to confront the preparer. The preparer's interpretations amount to witness statements collected by an entity external to the ECCC. They therefore enjoy no presumption of reliability (E96/7, para. 29).</p> <p>Finally, this document is only available in English. Unless it is made available in Khmer and French by 4 March 2013, it cannot be considered to have been put before the Chamber (pursuant to E185/1, para. 16, E246/1).</p>
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347	S-21 Confession	14 May 1977	S-21 Confession of EM Min alias SEN	E190.1.16	Confession of Sector 42 cadre. Contains annotation indicating that a copy of the confession was sent to KE Pauk.	Purge of the Old and New North Zones [52:193 to 198], S-21 Security Centre [108:415 to 475], Arrests and detentions [110:423 to 472], Composition of the Incarcerated Population [110:423 to 433], Interrogations [115:448 to 456]	<p>This document contains a confession. Confessions are torture-tainted material. Torture-tainted material is, under all its forms and in every circumstance (except against a person accused of torture as evidence that a statement was made), inadmissible in judicial proceedings before the ECCC. All preliminary biographical information and other derivative evidence contained in this document derived from torture-tainted material and is inadmissible. Torture-tainted material is not allowed under the law and it is inherently unreliable. The Trial Chamber must reject this document pursuant to Rule 87(3)(d). <i>See</i> Decision on Objections to Documents Proposed to be put before the Chamber on the Co-Prosecutors' Annexes A1-A5 and to Documents Cited in the Paragraphs of the Closing Order Relevant to the First Two Trial Segments of Case 002/01, 9 April 2012, E185, para. 21.</p> <p>This document is available only in English and actually has two separate English documents on the Case File. One is a selective translation of a confession which is not available on the Case File in its original language. It is impossible to tell why only certain portions were selected for translation and how such selective translation may have altered the meaning of the original text. The other English document is a summary/analysis of a confession prepared by DC-Cam. The summary was made by an organization the Defence considers biased. The person at DC-Cam who prepared the summary is not named. The summary contains the preparer's own interpretations and conclusions, rather than simply the text of the confession itself. For example: "Based on our recognition of script styles, these notes can be assumed as Khieu's." This document must not be admitted since Mr. IENG Sary has had no opportunity to confront the preparer. The preparer's interpretations amount to witness statements collected by an entity external to the ECCC. They therefore enjoy no presumption of reliability (E96/7, para. 29).</p> <p>Finally, this document is only available in English. Unless it is made available in Khmer and French by 4 March 2013, it cannot be considered to have been put before the Chamber (pursuant to E185/1, para. 16, E246/1).</p>
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348	S-21 Confession	07 May 1977	S-21 Confession of ENG Meng Heang alias CHHON (summary of confessions)	E190.1.17	Confessions' summaries of a Ministry of Commerce cadre. Contains annotations from SON Sen alias Khieu alias 47 and NUON Chea, one stating 'propose to take them out immediately', and a note from KAING Guek Eav alias Duch that an implicated cadre would be interrogated if Angkar approves.	S-21 Security Centre [108:415 to 475], Arrests and detentions [110:423 to 472], Composition of the Incarcerated Population [110:423 to 433], Interrogations [115:448 to 456], A. NUON CHEA [214:862 to 993], Participation in The Common Purpose [222:895 to 992], Security Centres and Execution Sites [228:916 to 974], Knowledge and Implementation of this Policy at S-21 [238:949 to 974], S-21 Confessions [242:963 to 967], Execution of Prisoners at S-21 [244:970 to 974], C. KHIEU SAMPHAN [284:1126 to 1200], Ministry of Commerce [288:1142 to 1144], Participation in the Common Purpose [291:1153 to 1199], Security Centres and Execution Sites [296:1172 to 1199], Knowledge and Implementation of this Policy at S-21 [298:1182 to 1183], Links to S-21 through Arrests and Killings [299:1184 to 1190]	<p>This document contains a confession. Confessions are torture-tainted material. Torture-tainted material is, under all its forms and in every circumstance (except against a person accused of torture as evidence that a statement was made), inadmissible in judicial proceedings before the ECCC. All preliminary biographical information and other derivative evidence contained in this document derived from torture-tainted material and is inadmissible. Torture-tainted material is not allowed under the law and it is inherently unreliable. The Trial Chamber must reject this document pursuant to Rule 87(3)(d). <i>See</i> Decision on Objections to Documents Proposed to be put before the Chamber on the Co-Prosecutors' Annexes A1-A5 and to Documents Cited in the Paragraphs of the Closing Order Relevant to the First Two Trial Segments of Case 002/01, 9 April 2012, E185, para. 21.</p> <p>This document is not an actual translation, but is a summary and analysis of a confession prepared by DC-Cam. The summary was made by an organization the Defence considers biased. The person at DC-Cam who prepared the summary is not named. The summary contains the preparer's own interpretations and conclusions, rather than simply the text of the confession itself. For example: "There is an underlined phrase... <i>It likely means</i> Khieu had proposed Nuon Chea for something..." This document must not be admitted since Mr. IENG Sary has had no opportunity to confront the preparer. The preparer's interpretations amount to witness statements collected by an entity external to the ECCC. They therefore enjoy no presumption of reliability (E96/7, para. 29).</p> <p>Finally, this document is only available in English. Unless it is made available in Khmer and French by 4 March 2013, it cannot be considered to have been put before the Chamber (pursuant to E185/1, para. 16, E246/1).</p>
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349	S-21 Confession	08 May 1977	S-21 Confession of TANN Try alias CHHOEURN	E190.1.36	Confession of an East Zone member of the Commerce Committee with annotations possibly belonging to NUON Chea.	Purge of the East Zone [54:199 to 204], S-21 Security Centre [108:415 to 475], Arrests and detentions [110:423 to 472], Composition of the Incarcerated Population [110:423 to 433], Interrogations [115:448 to 456], A. NUON CHEA [214:862 to 993], Participation in The Common Purpose [222:895 to 992], Security Centres and Execution Sites [228:916 to 974], Knowledge and Implementation of this Policy at S-21 [238:949 to 974], S-21 Confessions [242:963 to 967], C. KHIEU SAMPHAN [284:1126 to 1200], Ministry of Commerce [288:1142 to 1144], Participation in the Common Purpose [291:1153 to 1199], Security Centres and Execution Sites [296:1172 to 1199], Links to S-21 through Arrests and Killings [299:1184 to 1190]	<p>This document contains a confession. Confessions are torture-tainted material. Torture-tainted material is, under all its forms and in every circumstance (except against a person accused of torture as evidence that a statement was made), inadmissible in judicial proceedings before the ECCC. All preliminary biographical information and other derivative evidence contained in this document derived from torture-tainted material and is inadmissible. Torture-tainted material is not allowed under the law and it is inherently unreliable. The Trial Chamber must reject this document pursuant to Rule 87(3)(d). <i>See</i> Decision on Objections to Documents Proposed to be put before the Chamber on the Co-Prosecutors' Annexes A1-A5 and to Documents Cited in the Paragraphs of the Closing Order Relevant to the First Two Trial Segments of Case 002/01, 9 April 2012, E185, para. 21.</p> <p>This document is not an actual translation, but is a summary and analysis of a confession prepared by DC-Cam. The summary was made by an organization the Defence considers biased. The person at DC-Cam who prepared the summary is not named. The summary contains the preparer's own interpretations and conclusions, rather than simply the text of the confession itself. For example: "<i>These notes are likely to be the scripts of Nuon Chea.</i>" This document must not be admitted since Mr. IENG Sary has had no opportunity to confront the preparer. The preparer's interpretations amount to witness statements collected by an entity external to the ECCC. They therefore enjoy no presumption of reliability (E96/7, para. 29).</p>
350	S-21 Confession	11 May 1977	S-21 Confession of EM Min alias SEN	E190.1.15	Confession of Sector 42 cadre. Contains annotation indicating that a copy of the confession was sent to KE Pauk.	Purge of the Old and New North Zones [52:193 to 198], S-21 Security Centre [108:415 to 475], Arrests and detentions [110:423 to 472], Composition of the Incarcerated Population [110:423 to 433], Interrogations [115:448 to 456]	<p>This document contains a confession. Confessions are torture-tainted material. Torture-tainted material is, under all its forms and in every circumstance (except against a person accused of torture as evidence that a statement was made), inadmissible in judicial proceedings before the ECCC. All preliminary biographical information and other derivative evidence contained in this document derived from torture-tainted material and is inadmissible. Torture-tainted material is not allowed under the law and it is inherently unreliable. The Trial Chamber must reject this document pursuant to Rule 87(3)(d). <i>See</i> Decision on Objections to Documents Proposed to be put before the Chamber on the Co-Prosecutors' Annexes A1-A5 and to Documents Cited in the Paragraphs of the Closing Order Relevant to the First Two Trial Segments of Case 002/01, 9 April 2012, E185, para. 21.</p>

351	S-21 Confession	20 May 1977	S-21 Confession of MEN Mut	E190.1.27	Confession summary of logistics cadre from Division 502. Contains annotations possibly by NUON Chea.	S-21 Security Centre [108:415 to 475], Arrests and detentions [110:423 to 472], Composition of the Incarcerated Population [110:423 to 433], Interrogations [115:448 to 456], A. NUON CHEA [214:862 to 993], Participation in The Common Purpose [222:895 to 992], Security Centres and Execution Sites [228:916 to 974], S-21 Confessions [242:963 to 967]	<p>This document contains a confession. Confessions are torture-tainted material. Torture-tainted material is, under all its forms and in every circumstance (except against a person accused of torture as evidence that a statement was made), inadmissible in judicial proceedings before the ECCC. All preliminary biographical information and other derivative evidence contained in this document derived from torture-tainted material and is inadmissible. Torture-tainted material is not allowed under the law and it is inherently unreliable. The Trial Chamber must reject this document pursuant to Rule 87(3)(d). <i>See</i> Decision on Objections to Documents Proposed to be put before the Chamber on the Co-Prosecutors' Annexes A1-A5 and to Documents Cited in the Paragraphs of the Closing Order Relevant to the First Two Trial Segments of Case 002/01, 9 April 2012, E185, para. 21.</p> <p>This document is not an actual translation, but is a summary and analysis of a confession prepared by DC-Cam. The summary was made by an organization the Defence considers biased. The person at DC-Cam who prepared the summary is not named. The summary contains the preparer's own interpretations and conclusions, rather than simply the text of the confession itself. For example: "So, presumably the confession document relates to three people..." This document must not be admitted since Mr. IENG Sary has had no opportunity to confront the preparer. The preparer's interpretations amount to witness statements collected by an entity external to the ECCC. They therefore enjoy no presumption of reliability (E96/7, para. 29).</p>
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352	S-21 Confession	03 June 1977	S-21 Confession of POL Im alias POL Sieng LY, TUCH, IM, KHENG	E190.1.33	Confession of cook from the Ministry of Information. Contains annotations by NUON Chea that the "issue" had already been dealt with by Minister of Information YUN Yat alias At.	S-21 Security Centre [108:415 to 475], Arrests and detentions [110:423 to 472], Composition of the Incarcerated Population [110:423 to 433], Interrogations [115:448 to 456], A. NUON CHEA [214:862 to 993], Participation in The Common Purpose [222:895 to 992], Security Centres and Execution Sites [228:916 to 974], Knowledge and Involvement in the Arrests of "Enemies" [232:928 to 935], S-21 Confessions [242:963 to 967]	<p>This document contains a confession. Confessions are torture-tainted material. Torture-tainted material is, under all its forms and in every circumstance (except against a person accused of torture as evidence that a statement was made), inadmissible in judicial proceedings before the ECCC. All preliminary biographical information and other derivative evidence contained in this document derived from torture-tainted material and is inadmissible. Torture-tainted material is not allowed under the law and it is inherently unreliable. The Trial Chamber must reject this document pursuant to Rule 87(3)(d). <i>See</i> Decision on Objections to Documents Proposed to be put before the Chamber on the Co-Prosecutors' Annexes A1-A5 and to Documents Cited in the Paragraphs of the Closing Order Relevant to the First Two Trial Segments of Case 002/01, 9 April 2012, E185, para. 21.</p> <p>This document is not an actual translation, but is a summary and analysis of a confession prepared by DC-Cam. The summary was made by an organization the Defence considers biased. The person at DC-Cam who prepared the summary is not named. The summary contains the preparer's own interpretations and conclusions, rather than simply the text of the confession itself. This document must not be admitted since Mr. IENG Sary has had no opportunity to confront the preparer. The preparer's interpretations amount to witness statements collected by an entity external to the ECCC. They therefore enjoy no presumption of reliability (E96/7, para. 29).</p> <p>Finally, this document is only available in English. Unless it is made available in Khmer and French by 4 March 2013, it cannot be considered to have been put before the Chamber (pursuant to E185/1, para. 16, E246/1).</p>
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353	S-21 Confession	09 July 1977	S-21 Confession of YANG Sim alias HAK	E190.1.43	Confession of a Petroleum Storehouse Worker arrested on 2 February 1977. Contains an exchange of messages between SON Sen alias Khieu alias 47 and an individual identified as either NUON Chea or SALOTH Sar alias POL Pot concerning the measures to be taken relating to implicated persons.	S-21 Security Centre [108:415 to 475], Arrests and detentions [110:423 to 472], Composition of the Incarcerated Population [110:423 to 433], Interrogations [115:448 to 456], A. NUON CHEA [214:862 to 993], Participation in The Common Purpose [222:895 to 992], Security Centres and Execution Sites [228:916 to 974], Involvement in the Process of Arrest and Transfer to S-21 [241:958 to 962], S-21 Confessions [242:963 to 967]	<p>This document contains a confession. Confessions are torture-tainted material. Torture-tainted material is, under all its forms and in every circumstance (except against a person accused of torture as evidence that a statement was made), inadmissible in judicial proceedings before the ECCC. All preliminary biographical information and other derivative evidence contained in this document derived from torture-tainted material and is inadmissible. Torture-tainted material is not allowed under the law and it is inherently unreliable. The Trial Chamber must reject this document pursuant to Rule 87(3)(d). <i>See</i> Decision on Objections to Documents Proposed to be put before the Chamber on the Co-Prosecutors' Annexes A1-A5 and to Documents Cited in the Paragraphs of the Closing Order Relevant to the First Two Trial Segments of Case 002/01, 9 April 2012, E185, para. 21.</p> <p>This document is not an actual translation, but is a summary and analysis of a confession prepared by DC-Cam. The summary was made by an organization the Defence considers biased. The person at DC-Cam who prepared the summary is not named. The summary contains the preparer's own interpretations and conclusions, rather than simply the text of the confession itself. For example: "This document is presumably written by Nuon Chea or might have been Pol Pot." This document must not be admitted since Mr. IENG Sary has had no opportunity to confront the preparer. The preparer's interpretations amount to witness statements collected by an entity external to the ECCC. They therefore enjoy no presumption of reliability (E96/7, para. 29).</p> <p>Finally, this document is only available in English. Unless it is made available in Khmer and French by 4 March 2013, it cannot be considered to have been put before the Chamber (pursuant to E185/1, para. 16, E246/1).</p>
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354	S-21 Confession	12 July 1977	S-21 Confession of BOU Keo alias KHAV	E190.1.11	Confession of Sector 101 District Secretary, Northeast Zone. Contains annotations by NUON Chea indicating the confession had been sent to the Northeast Zone Office.	S-21 Security Centre [108:415 to 475], Arrests and detentions [110:423 to 472], Composition of the Incarcerated Population [110:423 to 433], Interrogations [115:448 to 456], A. NUON CHEA [214:862 to 993], Participation in The Common Purpose [222:895 to 992], Security Centres and Execution Sites [228:916 to 974], S-21 Confessions [242:963 to 967]	<p>This document contains a confession. Confessions are torture-tainted material. Torture-tainted material is, under all its forms and in every circumstance (except against a person accused of torture as evidence that a statement was made), inadmissible in judicial proceedings before the ECCC. All preliminary biographical information and other derivative evidence contained in this document derived from torture-tainted material and is inadmissible. Torture-tainted material is not allowed under the law and it is inherently unreliable. The Trial Chamber must reject this document pursuant to Rule 87(3)(d). <i>See</i> Decision on Objections to Documents Proposed to be put before the Chamber on the Co-Prosecutors' Annexes A1-A5 and to Documents Cited in the Paragraphs of the Closing Order Relevant to the First Two Trial Segments of Case 002/01, 9 April 2012, E185, para. 21.</p> <p>This document is not an actual translation, but is a summary and analysis of a confession prepared by DC-Cam. The summary was made by an organization the Defence considers biased. The person at DC-Cam who prepared the summary is not named. The summary contains the preparer's own interpretations and conclusions, rather than simply the text of the confession itself. This document must not be admitted since Mr. IENG Sary has had no opportunity to confront the preparer. The preparer's interpretations amount to witness statements collected by an entity external to the ECCC. They therefore enjoy no presumption of reliability (E96/7, para. 29).</p> <p>Finally, this document is only available in English. Unless it is made available in Khmer and French by 4 March 2013, it cannot be considered to have been put before the Chamber (pursuant to E185/1, para. 16, E246/1).</p>
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355	S-21 Confession	26 July 1977	S-21 Confession of KHEK Bin alias SOU	E190.1.19	Confession of Sector 4 Deputy Secretary, West Zone. Contains annotations attributed to NUON Chea by KAING Guek Eav alias Duch (D238).	S-21 Security Centre [108:415 to 475], Arrests and detentions [110:423 to 472], Composition of the Incarcerated Population [110:423 to 433], Interrogations [115:448 to 456], A. NUON CHEA [214:862 to 993], Participation in The Common Purpose [222:895 to 992], Security Centres and Execution Sites [228:916 to 974], S-21 Confessions [242:963 to 967]	<p>This document contains a confession. Confessions are torture-tainted material. Torture-tainted material is, under all its forms and in every circumstance (except against a person accused of torture as evidence that a statement was made), inadmissible in judicial proceedings before the ECCC. All preliminary biographical information and other derivative evidence contained in this document derived from torture-tainted material and is inadmissible. Torture-tainted material is not allowed under the law and it is inherently unreliable. The Trial Chamber must reject this document pursuant to Rule 87(3)(d). <i>See</i> Decision on Objections to Documents Proposed to be put before the Chamber on the Co-Prosecutors' Annexes A1-A5 and to Documents Cited in the Paragraphs of the Closing Order Relevant to the First Two Trial Segments of Case 002/01, 9 April 2012, E185, para. 21.</p> <p>This document is not an actual translation, but is a summary and analysis of a confession prepared by DC-Cam. The summary was made by an organization the Defence considers biased. The person at DC-Cam who prepared the summary is not named. The summary contains the preparer's own interpretations and conclusions, rather than simply the text of the confession itself. For example: "'Already skimmed through' is likely to be written by Nuon Chea." This document must not be admitted since Mr. IENG Sary has had no opportunity to confront the preparer. The preparer's interpretations amount to witness statements collected by an entity external to the ECCC. They therefore enjoy no presumption of reliability (E96/7, para. 29).</p> <p>Finally, this document is only available in English. Unless it is made available in Khmer and French by 4 March 2013, it cannot be considered to have been put before the Chamber (pursuant to E185/1, para. 16, E246/1).</p>
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356	S-21 Confession	01 August 1977	S-21 Confession of UM Tauy	E190.1.41	Confession of Sector 7 Chief, Northwest Zone. Contains annotation that confession was forwarded to SON Sen alias Khieu alias 47, NUON Chea and Northwest Zone.	S-21 Security Centre [108:415 to 475], Arrests and detentions [110:423 to 472], Composition of the Incarcerated Population [110:423 to 433], Interrogations [115:448 to 456], A. NUON CHEA [214:862 to 993], Participation in The Common Purpose [222:895 to 992], Security Centres and Execution Sites [228:916 to 974], Knowledge and Implementation of this Policy [230:923 to 927], S-21 Confessions [242:963 to 967]	<p>This document contains a confession. Confessions are torture-tainted material. Torture-tainted material is, under all its forms and in every circumstance (except against a person accused of torture as evidence that a statement was made), inadmissible in judicial proceedings before the ECCC. All preliminary biographical information and other derivative evidence contained in this document derived from torture-tainted material and is inadmissible. Torture-tainted material is not allowed under the law and it is inherently unreliable. The Trial Chamber must reject this document pursuant to Rule 87(3)(d). <i>See</i> Decision on Objections to Documents Proposed to be put before the Chamber on the Co-Prosecutors' Annexes A1-A5 and to Documents Cited in the Paragraphs of the Closing Order Relevant to the First Two Trial Segments of Case 002/01, 9 April 2012, E185, para. 21.</p> <p>This document is not an actual translation, but is a summary and analysis of a confession prepared by DC-Cam. The summary was made by an organization the Defence considers biased. The person at DC-Cam who prepared the summary is not named. The summary contains the preparer's own interpretations and conclusions, rather than simply the text of the confession itself. For example: "For verification, another person, such as Duch, should be made available for confirmation of these manuscripts because only he knows whose scripts they are." This document must not be admitted since Mr. IENG Sary has had no opportunity to confront the preparer. The preparer's interpretations amount to witness statements collected by an entity external to the ECCC. They therefore enjoy no presumption of reliability (E96/7, para. 29).</p> <p>Finally, this document is only available in English. Unless it is made available in Khmer and French by 4 March 2013, it cannot be considered to have been put before the Chamber (pursuant to E185/1, para. 16, E246/1).</p>
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357	S-21 Confession	24 August 1977	S-21 Confession of BUNG Kung alias SAMBOK (summary of confession)	E190.1.12	Confession of a cadre from Sector 22, East Zone. Contains annotations indicating NUON Chea received a copy.	Purge of the East Zone [54:199 to 204], S-21 Security Centre [108:415 to 475], Arrests and detentions [110:423 to 472], Composition of the Incarcerated Population [110:423 to 433], Interrogations [115:448 to 456], A. NUON CHEA [214:862 to 993], Participation in The Common Purpose [222:895 to 992], Security Centres and Execution Sites [228:916 to 974], Knowledge and Implementation of this Policy at S-2I [238:949 to 974], S-21 Confessions [242:963 to 967]	<p>This document contains a confession. Confessions are torture-tainted material. Torture-tainted material is, under all its forms and in every circumstance (except against a person accused of torture as evidence that a statement was made), inadmissible in judicial proceedings before the ECCC. All preliminary biographical information and other derivative evidence contained in this document derived from torture-tainted material and is inadmissible. Torture-tainted material is not allowed under the law and it is inherently unreliable. The Trial Chamber must reject this document pursuant to Rule 87(3)(d). <i>See</i> Decision on Objections to Documents Proposed to be put before the Chamber on the Co-Prosecutors' Annexes A1-A5 and to Documents Cited in the Paragraphs of the Closing Order Relevant to the First Two Trial Segments of Case 002/01, 9 April 2012, E185, para. 21.</p> <p>This document is not an actual translation, but is a summary and analysis of a confession prepared by DC-Cam. The summary was made by an organization the Defence considers biased. The person at DC-Cam who prepared the summary is not named. The summary contains the preparer's own interpretations and conclusions, rather than simply the text of the confession itself. For example: "There is an underlined phrase... <i>It likely means</i> Khieu had proposed Nuon Chea for something..." This document must not be admitted since Mr. IENG Sary has had no opportunity to confront the preparer. The preparer's interpretations amount to witness statements collected by an entity external to the ECCC. They therefore enjoy no presumption of reliability (E96/7, para. 29).</p>
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358	S-21 Confession	25 October 1977	S-21 Confession of SEANG Pouy alias Sean (summary)	E190.1.35	Confession summary containing annotation indicating confession was forwarded to NUON Chea, who then sent it to Northwest Zone Secretary Nhim.	VII. FACTUAL FINDINGS OF JOINT CRIMINAL ENTERPRISE [41:156 to 220], C. SECURITY CENTRES AND EXECUTION SITES [47:178 to 204], S-21 Security Centre [108:415 to 475], Arrests and detentions [110:423 to 472], Composition of the Incarcerated Population [110:423 to 433], Interrogations [115:448 to 456], A. NUON CHEA [214:862 to 993], Participation in The Common Purpose [222:895 to 992], Security Centres and Execution Sites [228:916 to 974], Communication and Circulation of Orders [238:950 to 957], S-21 Confessions [242:963 to 967]	<p>This document contains a confession. Confessions are torture-tainted material. Torture-tainted material is, under all its forms and in every circumstance (except against a person accused of torture as evidence that a statement was made), inadmissible in judicial proceedings before the ECCC. All preliminary biographical information and other derivative evidence contained in this document derived from torture-tainted material and is inadmissible. Torture-tainted material is not allowed under the law and it is inherently unreliable. The Trial Chamber must reject this document pursuant to Rule 87(3)(d). See Decision on Objections to Documents Proposed to be put before the Chamber on the Co-Prosecutors' Annexes A1-A5 and to Documents Cited in the Paragraphs of the Closing Order Relevant to the First Two Trial Segments of Case 002/01, 9 April 2012, E185, para. 21.</p> <p>This document is not an actual translation, but is a summary and analysis of a confession prepared by DC-Cam. The summary was made by an organization the Defence considers biased. The person at DC-Cam who prepared the summary is not named. The summary contains the preparer's own interpretations and conclusions, rather than simply the text of the confession itself. For example: "These notes are likely to be jotted down by Nuon Chea." This document must not be admitted since Mr. IENG Sary has had no opportunity to confront the preparer. The preparer's interpretations amount to witness statements collected by an entity external to the ECCC. They therefore enjoy no presumption of reliability (E96/7, para. 29).</p> <p>Finally, this document is only available in English. Unless it is made available in Khmer and French by 4 March 2013, it cannot be considered to have been put before the Chamber (pursuant to E185/1, para. 16, E246/1).</p>
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359	S-21 Confession	30 August 1977	S-21 Confession of SAO Leng alias REN	E190.1.34	Confession summary of Secretary of Regiment 70, Division 2. Contains annotations by NUON Chea.	S-21 Security Centre [108:415 to 475], Arrests and detentions [110:423 to 472], Composition of the Incarcerated Population [110:423 to 433], Interrogations [115:448 to 456], A. NUON CHEA [214:862 to 993], Participation in The Common Purpose [222:895 to 992], Security Centres and Execution Sites [228:916 to 974], S-21 Confessions [242:963 to 967]	<p>This document contains a confession. Confessions are torture-tainted material. Torture-tainted material is, under all its forms and in every circumstance (except against a person accused of torture as evidence that a statement was made), inadmissible in judicial proceedings before the ECCC. All preliminary biographical information and other derivative evidence contained in this document derived from torture-tainted material and is inadmissible. Torture-tainted material is not allowed under the law and it is inherently unreliable. The Trial Chamber must reject this document pursuant to Rule 87(3)(d). <i>See</i> Decision on Objections to Documents Proposed to be put before the Chamber on the Co-Prosecutors' Annexes A1-A5 and to Documents Cited in the Paragraphs of the Closing Order Relevant to the First Two Trial Segments of Case 002/01, 9 April 2012, E185, para. 21.</p> <p>This document is not an actual translation, but is a summary and analysis of a confession prepared by DC-Cam. The summary was made by an organization the Defence considers biased. The person at DC-Cam who prepared the summary is not named. The summary contains the preparer's own interpretations and conclusions, rather than simply the text of the confession itself. For example: "'Angkar' here might be referred by Son Sen to a particular person." This document must not be admitted since Mr. IENG Sary has had no opportunity to confront the preparer. The preparer's interpretations amount to witness statements collected by an entity external to the ECCC. They therefore enjoy no presumption of reliability (E96/7, para. 29).</p> <p>Finally, this document is only available in English. Unless it is made available in Khmer and French by 4 March 2013, it cannot be considered to have been put before the Chamber (pursuant to E185/1, para. 16, E246/1).</p>
360	S-21 Confession	18 September 1977	S-21 Confession of KRUOCH Man	E190.1.23	Confession of a member of Platoon, Company 72, Battalion 322, Division 703, with annotations possibly by NUON Chea.	G. PARTICIPATION OF RAK IN PURGES [39:146 to 149], S-21 Security Centre [108:415 to 475], Arrests and detentions [110:423 to 472], Composition of the Incarcerated Population [110:423 to 433], Interrogations [115:448 to 456], A. NUON CHEA [214:862 to 993], Participation in The Common Purpose [222:895 to 992], Security Centres and Execution Sites [228:916 to 974], S-21 Confessions [242:963 to 967]	<p>This document contains a confession. Confessions are torture-tainted material. Torture-tainted material is, under all its forms and in every circumstance (except against a person accused of torture as evidence that a statement was made), inadmissible in judicial proceedings before the ECCC. All preliminary biographical information and other derivative evidence contained in this document derived from torture-tainted material and is inadmissible. Torture-tainted material is not allowed under the law and it is inherently unreliable. The Trial Chamber must reject this document pursuant to Rule 87(3)(d). <i>See</i> Decision on Objections to Documents Proposed to be put before the Chamber on the Co-Prosecutors' Annexes A1-A5 and to Documents Cited in the Paragraphs of the Closing Order Relevant to the First Two Trial Segments of Case 002/01, 9 April 2012, E185, para. 21.</p>

361	S-21 Confession	21 September 1977	S-21 Confession of TUY Pheng alias PHAI (confession summary)	E190.1.39	Confession of Secretary of Koh Soten District, East Zone, with a DC-Cam analysis indicating that NUON Chea annotated the confession.	Purge of the East Zone [54:199 to 204], S-21 Security Centre [108:415 to 475], Arrests and detentions [110:423 to 472], Composition of the Incarcerated Population [110:423 to 433], Interrogations [115:448 to 456], A. NUON CHEA [214:862 to 993], S-21 Security Centre and S-24 Worksite (Prey Sar) [218:877 to 879], Participation in The Common Purpose [222:895 to 992], Security Centres and Execution Sites [228:916 to 974], Role in the Purge of the East Zone [235:937 to 942], Involvement in the Process of Arrest and Transfer to S-21 [241:958 to 962], S-21 Confessions [242:963 to 967]	<p>This document contains a confession. Confessions are torture-tainted material. Torture-tainted material is, under all its forms and in every circumstance (except against a person accused of torture as evidence that a statement was made), inadmissible in judicial proceedings before the ECCC. All preliminary biographical information and other derivative evidence contained in this document derived from torture-tainted material and is inadmissible. Torture-tainted material is not allowed under the law and it is inherently unreliable. The Trial Chamber must reject this document pursuant to Rule 87(3)(d). <i>See</i> Decision on Objections to Documents Proposed to be put before the Chamber on the Co-Prosecutors' Annexes A1-A5 and to Documents Cited in the Paragraphs of the Closing Order Relevant to the First Two Trial Segments of Case 002/01, 9 April 2012, E185, para. 21.</p> <p>This document is not an actual translation, but is a summary and analysis of a confession prepared by DC-Cam. The summary was made by an organization the Defence considers biased. The person at DC-Cam who prepared the summary is not named. The summary contains the preparer's own interpretations and conclusions, rather than simply the text of the confession itself. For example: "This is maybe a report sent to Angkar." This document must not be admitted since Mr. IENG Sary has had no opportunity to confront the preparer. The preparer's interpretations amount to witness statements collected by an entity external to the ECCC. They therefore enjoy no presumption of reliability (E96/7, para. 29).</p>
362	S-21 Confession	09 October 1977	S-21 Confession of HANG Oeun alias PON	E190.1.18	Confession of Under-Secretary of Battalion 901, Division 164.	G. PARTICIPATION OF RAK IN PURGES [39:146 to 149], S-21 Security Centre [108:415 to 475], Arrests and detentions [110:423 to 472], Composition of the Incarcerated Population [110:423 to 433], Interrogations [115:448 to 456]	<p>This document contains a confession. Confessions are torture-tainted material. Torture-tainted material is, under all its forms and in every circumstance (except against a person accused of torture as evidence that a statement was made), inadmissible in judicial proceedings before the ECCC. All preliminary biographical information and other derivative evidence contained in this document derived from torture-tainted material and is inadmissible. Torture-tainted material is not allowed under the law and it is inherently unreliable. The Trial Chamber must reject this document pursuant to Rule 87(3)(d). <i>See</i> Decision on Objections to Documents Proposed to be put before the Chamber on the Co-Prosecutors' Annexes A1-A5 and to Documents Cited in the Paragraphs of the Closing Order Relevant to the First Two Trial Segments of Case 002/01, 9 April 2012, E185, para. 21.</p> <p>This document is not an actual translation, but is a summary and analysis of a confession prepared by DC-Cam. The summary was made by an organization the Defence considers biased. The person at DC-Cam who prepared the summary is not named. The summary contains the preparer's own interpretations and conclusions, rather than simply the text of the confession itself. This document must not be admitted since Mr. IENG Sary has had no opportunity to confront the preparer. The preparer's interpretations amount to witness statements collected by an entity external to the ECCC. They therefore enjoy no presumption of reliability (E96/7, para. 29).</p>

363	S-21 Confession	10 October 1977	S-21 Confession of UM Chhoeun alias MAI	E190.1.40	Confession of former Ministry of Foreign Affairs cadre. DC-Cam analysis identifies annotation by NUON Chea.	S-21 Security Centre [108:415 to 475], Arrests and detentions [110:423 to 472], Composition of the Incarcerated Population [110:423 to 433], Interrogations [115:448 to 456], A. NUON CHEA [214:862 to 993], Participation in The Common Purpose [222:895 to 992], Security Centres and Execution Sites [228:916 to 974], S-21 Confessions [242:963 to 967], B. IENG SARY [250:994 to 1125], Participation in the Common Purpose [255:1018 to 1121], Links to S-21 through B-1 [267:1069 to 1089]	<p>This document contains a confession. Confessions are torture-tainted material. Torture-tainted material is, under all its forms and in every circumstance (except against a person accused of torture as evidence that a statement was made), inadmissible in judicial proceedings before the ECCC. All preliminary biographical information and other derivative evidence contained in this document derived from torture-tainted material and is inadmissible. Torture-tainted material is not allowed under the law and it is inherently unreliable. The Trial Chamber must reject this document pursuant to Rule 87(3)(d). <i>See</i> Decision on Objections to Documents Proposed to be put before the Chamber on the Co-Prosecutors' Annexes A1-A5 and to Documents Cited in the Paragraphs of the Closing Order Relevant to the First Two Trial Segments of Case 002/01, 9 April 2012, E185, para. 21.</p> <p>There are 2 English versions of this document on the Case File. One is not an actual translation, but is a summary and analysis of a confession prepared by DC-Cam. The summary was made by an organization the Defence considers biased. The person at DC-Cam who prepared the summary is not named. The summary contains the preparer's own interpretations and conclusions, rather than simply the text of the confession itself. For example: "Son Sen's notes are likely to have been sent to Nuon Chea." This document must not be admitted since Mr. IENG Sary has had no opportunity to confront the preparer. The preparer's interpretations amount to witness statements collected by an entity external to the ECCC. They therefore enjoy no presumption of reliability (E96/7, para. 29).</p>
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364	S-21 Confession	14 October 1977	S-21 Confession of PECH Phan alias MAI Pho	E190.1.30	Confession of the Chief of Communications at the East Zone Rubber Plantation. Contains annotations by NUON Chea.	Purge of the East Zone [54:199 to 204], S-21 Security Centre [108:415 to 475], Arrests and detentions [110:423 to 472], Composition of the Incarcerated Population [110:423 to 433], Detention conditions [114:441 to 447], Interrogations [115:448 to 456], A. NUON CHEA [214:862 to 993], Participation in The Common Purpose [222:895 to 992], Security Centres and Execution Sites [228:916 to 974], S-21 Confessions [242:963 to 967], Interrogation at S-21 [244:968 to 969]	<p>This document contains a confession. Confessions are torture-tainted material. Torture-tainted material is, under all its forms and in every circumstance (except against a person accused of torture as evidence that a statement was made), inadmissible in judicial proceedings before the ECCC. All preliminary biographical information and other derivative evidence contained in this document derived from torture-tainted material and is inadmissible. Torture-tainted material is not allowed under the law and it is inherently unreliable. The Trial Chamber must reject this document pursuant to Rule 87(3)(d). <i>See</i> Decision on Objections to Documents Proposed to be put before the Chamber on the Co-Prosecutors' Annexes A1-A5 and to Documents Cited in the Paragraphs of the Closing Order Relevant to the First Two Trial Segments of Case 002/01, 9 April 2012, E185, para. 21.</p> <p>This document is not an actual translation, but is a summary and analysis of a confession prepared by DC-Cam. The summary was made by an organization the Defence considers biased. The person at DC-Cam who prepared the summary is not named. The summary contains the preparer's own interpretations and conclusions, rather than simply the text of the confession itself. For example: "It is likely to be written by Nuon Chea." This document must not be admitted since Mr. IENG Sary has had no opportunity to confront the preparer. The preparer's interpretations amount to witness statements collected by an entity external to the ECCC. They therefore enjoy no presumption of reliability (E96/7, para. 29).</p>
365	S-21 Confession	21 October 1977	S-21 Confession of KOAM Chan alias CHORN	E190.1.21	Confession of Secretary of Sector 43. Contains annotation indicating that implicated cadre had been identified for KE Pauk, and a report from the interrogator describing the use of torture.	Purge of the Old and New North Zones [52:193 to 198], S-21 Security Centre [108:415 to 475], Arrests and detentions [110:423 to 472], Composition of the Incarcerated Population [110:423 to 433], Interrogations [115:448 to 456]	<p>This document contains a confession. Confessions are torture-tainted material. Torture-tainted material is, under all its forms and in every circumstance (except against a person accused of torture as evidence that a statement was made), inadmissible in judicial proceedings before the ECCC. All preliminary biographical information and other derivative evidence contained in this document derived from torture-tainted material and is inadmissible. Torture-tainted material is not allowed under the law and it is inherently unreliable. The Trial Chamber must reject this document pursuant to Rule 87(3)(d). <i>See</i> Decision on Objections to Documents Proposed to be put before the Chamber on the Co-Prosecutors' Annexes A1-A5 and to Documents Cited in the Paragraphs of the Closing Order Relevant to the First Two Trial Segments of Case 002/01, 9 April 2012, E185, para. 21.</p> <p>There are two versions of the document on the Case File in Khmer. Documents should not be admitted unless they are available and identical in each language.</p>

366	S-21 Confession	3 December 1977	S-21 Confession of KOAM Chan alias CHORN (Summary)	E190.1.22	Confession of Secretary of Sector 43. Contains annotation indicating that implicated cadre had been identified for KE Pauk, and a report from the interrogator describing the use of torture.	Purge of the Old and New North Zones [52:193 to 198], S-21 Security Centre [108:415 to 475], Arrests and detentions [110:423 to 472], Composition of the Incarcerated Population [110:423 to 433], Interrogations [115:448 to 456]	<p>This document contains a confession. Confessions are torture-tainted material. Torture-tainted material is, under all its forms and in every circumstance (except against a person accused of torture as evidence that a statement was made), inadmissible in judicial proceedings before the ECCC. All preliminary biographical information and other derivative evidence contained in this document derived from torture-tainted material and is inadmissible. Torture-tainted material is not allowed under the law and it is inherently unreliable. The Trial Chamber must reject this document pursuant to Rule 87(3)(d). <i>See</i> Decision on Objections to Documents Proposed to be put before the Chamber on the Co-Prosecutors' Annexes A1-A5 and to Documents Cited in the Paragraphs of the Closing Order Relevant to the First Two Trial Segments of Case 002/01, 9 April 2012, E185, para. 21.</p> <p>This document is not an actual translation, but is a summary and analysis of a confession prepared by DC-Cam. The summary was made by an organization the Defence considers biased. The person at DC-Cam who prepared the summary is not named. The summary contains the preparer's own interpretations and conclusions, rather than simply the text of the confession itself. This document must not be admitted since Mr. IENG Sary has had no opportunity to confront the preparer. The preparer's interpretations amount to witness statements collected by an entity external to the ECCC. They therefore enjoy no presumption of reliability (E96/7, para. 29).</p>
367	S-21 Confession	16 November 1977	S-21 Confession of PHENG Sun alias CHEY	E190.1.31	Confession of Chief of the Central Zone Commercial Section. Contains annotations indicating a copy was submitted to NUON Chea.	Purge of the Old and New North Zones [52:193 to 198], S-21 Security Centre [108:415 to 475], Arrests and detentions [110:423 to 472], Composition of the Incarcerated Population [110:423 to 433], Interrogations [115:448 to 456], A. NUON CHEA [214:862 to 993], Participation in The Common Purpose [222:895 to 992], Security Centres and Execution Sites [228:916 to 974], Knowledge and Implementation of this Policy at S-21 [238:949 to 974], S-21 Confessions [242:963 to 967], C. KHIEU SAMPHAN [284:1126 to 1200], Ministry of Commerce [288:1142 to 1144], Participation in the Common Purpose [291:1153 to 1199], Security Centres and Execution Sites [296:1172 to 1199], Links to S-21 through Arrests and Killings [299:1184 to 1190]	<p>This document contains a confession. Confessions are torture-tainted material. Torture-tainted material is, under all its forms and in every circumstance (except against a person accused of torture as evidence that a statement was made), inadmissible in judicial proceedings before the ECCC. All preliminary biographical information and other derivative evidence contained in this document derived from torture-tainted material and is inadmissible. Torture-tainted material is not allowed under the law and it is inherently unreliable. The Trial Chamber must reject this document pursuant to Rule 87(3)(d). <i>See</i> Decision on Objections to Documents Proposed to be put before the Chamber on the Co-Prosecutors' Annexes A1-A5 and to Documents Cited in the Paragraphs of the Closing Order Relevant to the First Two Trial Segments of Case 002/01, 9 April 2012, E185, para. 21.</p> <p>It appears that the English version of this document may be missing several pages of translation. It is uncertain how this might affect the meaning of the translation or what might have been omitted. The document should not be considered for admission until full translations in all languages are available on the Case File.</p>

368	S-21 Confession	29 January 1978	S-21 Confession of PHON Yim alias KHA	E190.1.32	Confession of staff member of Hospital 17 April.	S-21 Security Centre [108:415 to 475], Arrests and detentions [110:423 to 472], Composition of the Incarcerated Population [110:423 to 433], Interrogations [115:448 to 456], D. IENG THIRITH [304:1201 to 1298], Participation in the Common Purpose [309:1227to1295], Security Centres and Execution Sites [313:1247 to 1287], Knowledge and Implementation of this Policy at the Ministry of Social Affairs [316:1265 to 1272], Links to S-21 through the Ministry of Social Affairs [318:1273 to 1287]	<p>This document contains a confession. Confessions are torture-tainted material. Torture-tainted material is, under all its forms and in every circumstance (except against a person accused of torture as evidence that a statement was made), inadmissible in judicial proceedings before the ECCC. All preliminary biographical information and other derivative evidence contained in this document derived from torture-tainted material and is inadmissible. Torture-tainted material is not allowed under the law and it is inherently unreliable. The Trial Chamber must reject this document pursuant to Rule 87(3)(d). <i>See</i> Decision on Objections to Documents Proposed to be put before the Chamber on the Co-Prosecutors' Annexes A1-A5 and to Documents Cited in the Paragraphs of the Closing Order Relevant to the First Two Trial Segments of Case 002/01, 9 April 2012, E185, para. 21.</p> <p>There are two English versions of this document on the Case File. One appears to be an actual translation of the Khmer document. However, it appears to be missing pages. It is unclear what has been omitted from translation and how these omissions may affect the meaning of the document. The document should not be considered for admission until all pages are translated.</p> <p>The other English version of this document is a summary/analysis prepared by an unknown person or organization. This document must not be admitted since Mr. IENG Sary has had no opportunity to confront the preparer. There is furthermore no reason to admit a summary when the full document is already available on the Case File.</p> <p>This document appears mainly to be relevant, according to the OCP's own annex, for Ms. Ieng Thirith. Since Ms. Ieng Thirith has been severed from this case, this document should be rejected as irrelevant pursuant to Rule 87(3)(a).</p>
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369	S-21 Confession	17 January 1978	S-21 Confession of LENG Sim Hak alias SEI	E190.1.26	Confession of IENG Thirith alias Phea's Deputy, Head of Po-17 Hospital, member of DK Ministry of Social Affairs Committee, and representative of the DK Women's Association. Indicates date of arrest as 17 December 1977.	S-21 Security Centre [108:415 to 475], Arrests and detentions [110:423 to 472], Composition of the Incarcerated Population [110:423 to 433], Interrogations [115:448 to 456], D. IENG THIRITH [304:1201 to 1298], Participation in the Common Purpose [309:1227to1295], Security Centres and Execution Sites [313:1247 to 1287], Knowledge and Implementation of this Policy at the Ministry of Social Affairs [316:1265 to 1272], Links to S-21 through the Ministry of Social Affairs [318:1273 to 1287]	<p>This document contains a confession. Confessions are torture-tainted material. Torture-tainted material is, under all its forms and in every circumstance (except against a person accused of torture as evidence that a statement was made), inadmissible in judicial proceedings before the ECCC. All preliminary biographical information and other derivative evidence contained in this document derived from torture-tainted material and is inadmissible. Torture-tainted material is not allowed under the law and it is inherently unreliable. The Trial Chamber must reject this document pursuant to Rule 87(3)(d). <i>See</i> Decision on Objections to Documents Proposed to be put before the Chamber on the Co-Prosecutors' Annexes A1-A5 and to Documents Cited in the Paragraphs of the Closing Order Relevant to the First Two Trial Segments of Case 002/01, 9 April 2012, E185, para. 21.</p> <p>It appears that the English version of this document may be missing several pages of translation. It is uncertain how this might affect the meaning of the translation or what might have been omitted. The document should not be considered for admission until full translations in all languages are available on the Case File.</p> <p>This document appears mainly to be relevant, according to the OCP's own annex, for Ms. Ieng Thirith. Since Ms. Ieng Thirith has been severed from this case, this document should be rejected as irrelevant pursuant to Rule 87(3)(a).</p>
370	S-21 Confession	11 November 1978	S-21 Confession of CHEY Rong	E190.1.13	Confession of Assistant to House Renovation Committee at Office S-8, Ministry of Public Works.	E. MINISTRIES (GOVERNMENT) OF DEMOCRATIC KAMPUCHEA [23:62 to 63], S-21 Security Centre [108:415 to 475], Arrests and detentions [110:423 to 472], Composition of the Incarcerated Population [110:423 to 433], Interrogations [115:448 to 456]	<p>This document contains a confession. Confessions are torture-tainted material. Torture-tainted material is, under all its forms and in every circumstance (except against a person accused of torture as evidence that a statement was made), inadmissible in judicial proceedings before the ECCC. All preliminary biographical information and other derivative evidence contained in this document derived from torture-tainted material and is inadmissible. Torture-tainted material is not allowed under the law and it is inherently unreliable. The Trial Chamber must reject this document pursuant to Rule 87(3)(d). <i>See</i> Decision on Objections to Documents Proposed to be put before the Chamber on the Co-Prosecutors' Annexes A1-A5 and to Documents Cited in the Paragraphs of the Closing Order Relevant to the First Two Trial Segments of Case 002/01, 9 April 2012, E185, para. 21.</p> <p>The English version of this document appears to be a partial translation of a confession prepared by DC-Cam. If this summary was made by DC-Cam, it was made by an organization the Defence considers biased. The person at DC-Cam who prepared the summary is not named. The summary contains (in footnotes) the preparer's own interpretations and conclusions, rather than simply the text of the confession itself. This document must not be admitted since Mr. IENG Sary has had no opportunity to confront the preparer. The preparer's interpretations amount to witness statements collected by an entity external to the ECCC. They therefore enjoy no presumption of reliability (E96/7, para. 29).</p>

371	S-21 Confession	25 December 1978	S-21 Confession of KING Han alias KING Pheang	E190.1.20	Confession of Chairman of the Orchards Section of the 17 April Hospital.	S-21 Security Centre [108:415 to 475], Arrests and detentions [110:423 to 472], Composition of the Incarcerated Population [110:423 to 433], Interrogations [115:448 to 456], D. IENG THIRITH [304:1201 to 1298], Participation in the Common Purpose [309:1227to1295], Security Centres and Execution Sites [313:1247 to 1287], Links to S-21 through the Ministry of Social Affairs [318:1273 to 1287]	<p>This document contains a confession. Confessions are torture-tainted material. Torture-tainted material is, under all its forms and in every circumstance (except against a person accused of torture as evidence that a statement was made), inadmissible in judicial proceedings before the ECCC. All preliminary biographical information and other derivative evidence contained in this document derived from torture-tainted material and is inadmissible. Torture-tainted material is not allowed under the law and it is inherently unreliable. The Trial Chamber must reject this document pursuant to Rule 87(3)(d). <i>See</i> Decision on Objections to Documents Proposed to be put before the Chamber on the Co-Prosecutors' Annexes A1-A5 and to Documents Cited in the Paragraphs of the Closing Order Relevant to the First Two Trial Segments of Case 002/01, 9 April 2012, E185, para. 21.</p> <p>This document appears mainly to be relevant, according to the OCP's own annex, for Ms. Ieng Thirith. Since Ms. Ieng Thirith has been severed from this case, this document should be rejected as irrelevant pursuant to Rule 87(3)(a).</p>
372	S-21 Execution Log	10 May 1977	S-21 Execution log entitled "List of Prisoners to Be Taken Out"	E190.1.10	List of 21 prisoners to be "taken out", including mainly teachers and students. Compiled by Chairman of Prey Sar, NUN Huy alias HUY Sre	VII. FACTUAL FINDINGS OF JOINT CRIMINAL ENTERPRISE [41:156 to 220], Purge of the Old and New North Zones [52:193 to 198], D. TREATMENT OF TARGETED GROUPS [55:205 to 215], Prey Sar Worksite (S-24) [104:400 to 414], S-21 Security Centre [108:415 to 475], Composition of the Incarcerated Population [110:423 to 433], Arrest and transfer to S-21 [112:434 to 436], Execution Prisoner 119460 to 462	<p>Torture-tainted material is, under all its forms and in every circumstance (except against a person accused of torture as evidence that a statement was made), inadmissible in judicial proceedings before the ECCC. All preliminary biographical information and other derivative evidence contained in this document derived from torture-tainted material and is inadmissible. Torture-tainted material is not allowed under the law and it is inherently unreliable. The Trial Chamber must reject this document pursuant to Rule 87(3)(d). <i>See</i> Decision on Objections to Documents Proposed to be put before the Chamber on the Co-Prosecutors' Annexes A1-A5 and to Documents Cited in the Paragraphs of the Closing Order Relevant to the First Two Trial Segments of Case 002/01, 9 April 2012, E185, para. 21.</p>
373	S-21 Prisoner List	17 April 1975 to 07 January 1979	S-21 Prisoner List	E190.1.9	List of 17 prisoners arrested from the People's Assembly Office, Ministry of Foreign Affairs, Land & Water Transportation and documents produced by them.	S-21 Security Centre [108:415 to 475], Arrests and detentions [110:423 to 472], Composition of the Incarcerated Population [110:423 to 433], Interrogations [115:448 to 456], B. IENG SARY [250:994 to 1125], Participation in the Common Purpose [255:1018 to 1121], Security Centres and Execution Sites [262:1048 to 1104], Links to S-21 through B-1 [267:1069 to 1089]	<p>Torture-tainted material is, under all its forms and in every circumstance (except against a person accused of torture as evidence that a statement was made), inadmissible in judicial proceedings before the ECCC. All preliminary biographical information and other derivative evidence contained in this document derived from torture-tainted material and is inadmissible. Torture-tainted material is not allowed under the law and it is inherently unreliable. The Trial Chamber must reject this document pursuant to Rule 87(3)(d). <i>See</i> Decision on Objections to Documents Proposed to be put before the Chamber on the Co-Prosecutors' Annexes A1-A5 and to Documents Cited in the Paragraphs of the Closing Order Relevant to the First Two Trial Segments of Case 002/01, 9 April 2012, E185, para. 21.</p>

374	Video	1998	Video entitled "KHIEU Samphan and Nuon Chea's Press Conference"	E190.1.297 R	Depicts press conference with NUON Chea and KHIEU Samphan alias Haem in December 1998 after their surrender to the government, during which Khieu Samphan appealed to "let bygones be bygones" and NUON Chea apologized for all the animals that were killed during the DK regime.	A. NUON CHEA [214:862 to 993], Background [214:862 to 868], C. KHIEU SAMPHAN [284:1126 to 1200], Background [285:1126 to 1130], PART FOUR: CHARACTER INFORMATION [390:1577to1612], I. NUON CHEA [390:1577to1584], III. KHIEU SAMPHAN [393:1598to1604]	This video is not available in all three official languages and no transcript appears to be available to allow all parties to know what was said in the Khmer original. From the OCP's own summary of this video, it does not appear to be relevant to events at issue in Case 002. Further, Mr. IENG Sary has not had the opportunity to confront the filmmaker. It is unknown what statements the filmmaker may have chosen to omit from this video. Statements contained in the video were taken by an entity external to the ECCC. This video therefore enjoys no presumption of reliability (E96/7, para. 29). It is impossible to verify accuracy of the statements. Unless Mr. IENG Sary is permitted to confront the filmmaker at trial, this video must not be admitted. Should the Trial Chamber nonetheless find that the video is admissible, it should accord the video little or no weight.
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Ieng Sary's objections to Civil Parties list of new documents put on the Case File by TC Decision E190

	Type	Date	Title	Document number	Objections
1	Statement	9 January 2011	Statement by SOK Raon	E9/32.2.1	<p>This is a statement of a witness which does not appear to go to acts and conduct of the accused. It was taken by a Civil Party lawyer. No audio recording appears to be available. Since this statement was not taken under judicial supervision, it should be considered to have the same status as a statement taken by an entity external to the ECCC, which enjoys no presumption of reliability (E96/7, para. 29). Mr. IENG Sary was afforded no opportunity to confront this witness. The Trial Chamber should therefore give little or no weight to this statement, should it find that the statement is admissible pursuant to the criteria set out in Rule 87(3).</p> <p>Finally, this statement is not available in English or French. Unless it is made available in English and French by 4 March 2013, it cannot be considered to have been put before the Chamber (pursuant to E185/1, para. 16, E246/1).</p>
2	Statement	8 January 2011	Statement by SAR Seang	E9/32.2.2	<p>This is a statement of a witness which does not appear to go to acts and conduct of the accused. It was taken by a Civil Party lawyer. No audio recording appears to be available. Since this statement was not taken under judicial supervision, it should be considered to have the same status as a statement taken by an entity external to the ECCC, which enjoys no presumption of reliability (E96/7, para. 29). Mr. IENG Sary was afforded no opportunity to confront this witness. The Trial Chamber should therefore give little or no weight to this statement, should it find that the statement is admissible pursuant to the criteria set out in Rule 87(3).</p> <p>Finally, this statement is not available in English or French. Unless it is made available in English and French by 4 March 2013, it cannot be considered to have been put before the Chamber (pursuant to E185/1, para. 16, E246/1).</p>
3	Statement	10 January 2011	Statement by MOL Doeun	E9/32.2.3	<p>This is a statement of a witness which does not appear to go to acts and conduct of the accused. It was taken by a Civil Party lawyer. No audio recording appears to be available. Since this statement was not taken under judicial supervision, it should be considered to have the same status as a statement taken by an entity external to the ECCC, which enjoys no presumption of reliability (E96/7, para. 29). Mr. IENG Sary was afforded no opportunity to confront this witness. The Trial Chamber should therefore give little or no weight to this statement, should it find that the statement is admissible pursuant to the criteria set out in Rule 87(3).</p> <p>Finally, this statement is not available in English or French. Unless it is made available in English and French by 4 March 2013, it cannot be considered to have been put before the Chamber (pursuant to E185/1, para. 16, E246/1).</p>

4	Statement	10 January 2011	Statement by Phorn Met	E9/32.2.4	<p>This is a statement of a witness which does not appear to go to acts and conduct of the accused. It was taken by a Civil Party lawyer. No audio recording appears to be available. Since this statement was not taken under judicial supervision, it should be considered to have the same status as a statement taken by an entity external to the ECCC, which enjoys no presumption of reliability (E96/7, para. 29). Mr. IENG Sary was afforded no opportunity to confront this witness. The Trial Chamber should therefore give little or no weight to this statement, should it find that the statement is admissible pursuant to the criteria set out in Rule 87(3).</p> <p>Finally, this statement is not available in English or French. Unless it is made available in English and French by 4 March 2013, it cannot be considered to have been put before the Chamber (pursuant to E185/1, para. 16, E246/1).</p>
5	Statement	9 January 2011	Statement by HOENG Sambou	E9/32.2.5	<p>This is a statement of a witness which does not appear to go to acts and conduct of the accused. It was taken by a Civil Party lawyer. No audio recording appears to be available. Since this statement was not taken under judicial supervision, it should be considered to have the same status as a statement taken by an entity external to the ECCC, which enjoys no presumption of reliability (E96/7, para. 29). Mr. IENG Sary was afforded no opportunity to confront this witness. The Trial Chamber should therefore give little or no weight to this statement, should it find that the statement is admissible pursuant to the criteria set out in Rule 87(3).</p> <p>Finally, this statement is not available in English or French. Unless it is made available in English and French by 4 March 2013, it cannot be considered to have been put before the Chamber (pursuant to E185/1, para. 16, E246/1).</p>
6	Statement	8 January 2011	Statement by NGUON Hel	E9/32.2.6	<p>This is a statement of a witness which does not appear to go to acts and conduct of the accused. It was taken by a Civil Party lawyer. No audio recording appears to be available. Since this statement was not taken under judicial supervision, it should be considered to have the same status as a statement taken by an entity external to the ECCC, which enjoys no presumption of reliability (E96/7, para. 29). Mr. IENG Sary was afforded no opportunity to confront this witness. The Trial Chamber should therefore give little or no weight to this statement, should it find that the statement is admissible pursuant to the criteria set out in Rule 87(3).</p> <p>Finally, this statement is not available in English or French. Unless it is made available in English and French by 4 March 2013, it cannot be considered to have been put before the Chamber (pursuant to E185/1, para. 16, E246/1).</p>
7	Statement	20 January 2011	Statement by SOK Phe	E9/32.2.7	<p>This is a statement of a witness which does not appear to go to acts and conduct of the accused. It was taken by a Civil Party lawyer. No audio recording appears to be available. Since this statement was not taken under judicial supervision, it should be considered to have the same status as a statement taken by an entity external to the ECCC, which enjoys no presumption of reliability (E96/7, para. 29). Mr. IENG Sary was afforded no opportunity to confront this witness. The Trial Chamber should therefore give little or no weight to this statement, should it find that the statement is admissible pursuant to the criteria set out in Rule 87(3).</p> <p>Finally, this statement is not available in English or French. Unless it is made available in English and French by 4 March 2013, it cannot be considered to have been put before the Chamber (pursuant to E185/1, para. 16, E246/1).</p>
8	Statement	7 January 2011	Statement by SOK Sarath	E9/32.2.8	<p>This is a statement of a witness which does not appear to go to acts and conduct of the accused. It was taken by a Civil Party lawyer. No audio recording appears to be available. Since this statement was not taken under judicial supervision, it should be considered to have the same status as a statement taken by an entity external to the ECCC, which enjoys no presumption of reliability (E96/7, para. 29). Mr. IENG Sary was afforded no opportunity to confront this witness. The Trial Chamber should therefore give little or no weight to this statement, should it find that the statement is admissible pursuant to the criteria set out in Rule 87(3).</p> <p>Finally, this statement is not available in English or French. Unless it is made available in English and French by 4 March 2013, it cannot be considered to have been put before the Chamber (pursuant to E185/1, para. 16, E246/1).</p>
9	Statement	8 January 2011	Statement by CHIM Foun	E9/32.2.9	<p>This is a statement of a witness which does not appear to go to acts and conduct of the accused. It was taken by a Civil Party lawyer. No audio recording appears to be available. Since this statement was not taken under judicial supervision, it should be considered to have the same status as a statement taken by an entity external to the ECCC, which enjoys no presumption of reliability (E96/7, para. 29). Mr. IENG Sary was afforded no opportunity to confront this witness. The Trial Chamber should therefore give little or no weight to this statement, should it find that the statement is admissible pursuant to the criteria set out in Rule 87(3).</p> <p>Finally, this statement is not available in English or French. Unless it is made available in English and French by 4 March 2013, it cannot be considered to have been put before the Chamber (pursuant to E185/1, para. 16, E246/1).</p>

10	Statement	7 January 2011	Statement by MA Chandara	E9/32.2.10	<p>This is a statement of a witness which does not appear to go to acts and conduct of the accused. It was taken by a Civil Party lawyer. No audio recording appears to be available. Since this statement was not taken under judicial supervision, it should be considered to have the same status as a statement taken by an entity external to the ECCC, which enjoys no presumption of reliability (E96/7, para. 29). Mr. IENG Sary was afforded no opportunity to confront this witness. The Trial Chamber should therefore give little or no weight to this statement, should it find that the statement is admissible pursuant to the criteria set out in Rule 87(3).</p> <p>Finally, this statement is not available in English or French. Unless it is made available in English and French by 4 March 2013, it cannot be considered to have been put before the Chamber (pursuant to E185/1, para. 16, E246/1).</p>
11	Statement	21 December 2010	Statement by LE Yang Sour	E9/32.2.11	<p>This is a statement of a witness which does not appear to go to acts and conduct of the accused. It was taken by a Civil Party lawyer. No audio recording appears to be available. Since this statement was not taken under judicial supervision, it should be considered to have the same status as a statement taken by an entity external to the ECCC, which enjoys no presumption of reliability (E96/7, para. 29). Mr. IENG Sary was afforded no opportunity to confront this witness. The Trial Chamber should therefore give little or no weight to this statement, should it find that the statement is admissible pursuant to the criteria set out in Rule 87(3).</p> <p>Finally, this statement is not available in Khmer or French. Unless it is made available in Khmer and French by 4 March 2013, it cannot be considered to have been put before the Chamber (pursuant to E185/1, para. 16, E246/1).</p>
12	Statement	8 February 2011	Statement by PAO Chhun Leng	E9/32.2.12	<p>This is a statement of a witness which does not appear to go to acts and conduct of the accused. It was taken by a Civil Party lawyer. No audio recording appears to be available. Since this statement was not taken under judicial supervision, it should be considered to have the same status as a statement taken by an entity external to the ECCC, which enjoys no presumption of reliability (E96/7, para. 29). Mr. IENG Sary was afforded no opportunity to confront this witness. The Trial Chamber should therefore give little or no weight to this statement, should it find that the statement is admissible pursuant to the criteria set out in Rule 87(3).</p> <p>Finally, this statement is not available in English or French. Unless it is made available in English and French by 4 March 2013, it cannot be considered to have been put before the Chamber (pursuant to E185/1, para. 16, E246/1).</p>
13	Statement	11 February 2011	Statement by MIN Samon	E9/32.2.13	<p>This is a statement of a witness which does not appear to go to acts and conduct of the accused. It was taken by a Civil Party lawyer. No audio recording appears to be available. Since this statement was not taken under judicial supervision, it should be considered to have the same status as a statement taken by an entity external to the ECCC, which enjoys no presumption of reliability (E96/7, para. 29). Mr. IENG Sary was afforded no opportunity to confront this witness. The Trial Chamber should therefore give little or no weight to this statement, should it find that the statement is admissible pursuant to the criteria set out in Rule 87(3).</p> <p>Finally, this statement is not available in English or French. Unless it is made available in English and French by 4 March 2013, it cannot be considered to have been put before the Chamber (pursuant to E185/1, para. 16, E246/1).</p>
14	Statement	7 February 2011	Statement by CHUM Neou	E9/32.2.14	<p>This is a statement of a witness which does not appear to go to acts and conduct of the accused. It was taken by a Civil Party lawyer. No audio recording appears to be available. Since this statement was not taken under judicial supervision, it should be considered to have the same status as a statement taken by an entity external to the ECCC, which enjoys no presumption of reliability (E96/7, para. 29). Mr. IENG Sary was afforded no opportunity to confront this witness. The Trial Chamber should therefore give little or no weight to this statement, should it find that the statement is admissible pursuant to the criteria set out in Rule 87(3).</p> <p>Finally, this statement is not available in English or French. Unless it is made available in English and French by 4 March 2013, it cannot be considered to have been put before the Chamber (pursuant to E185/1, para. 16, E246/1).</p>
15	Statement	April 1975 - present	Documentary film, 'Cambodge, face au Génocide', David ARONOWITSCH and Staffan LINDBERG	E109/2.3R	<p>This video has not been transcribed. Further, Mr. IENG Sary has not had the opportunity to confront the filmmaker. It is unknown what statements the filmmaker may have chosen to omit from this video. Statements contained in the video were taken by an entity external to the ECCC. This video therefore enjoys no presumption of reliability (E96/7, para. 29). It is impossible to verify accuracy of the statements. Unless Mr. IENG Sary is permitted to confront the filmmaker at trial, this video must not be admitted. Should the Trial Chamber nonetheless find that the video is admissible, it should accord the video little or no weight.</p>

16	Statement	28 February 2011	Witness statement of CHOU Koeleng	E9/32.2.28	<p>This is a statement compiled by Civil Party lawyers from phone conversations with a witness. This is a statement that goes to the acts and conduct of the accused. It discusses Nuon Chea and Khieu Samphan's presence at a worksite. Mr. IENG Sary was afforded no opportunity to confront this witness. This statement must be regarded as "not allowed under the law" pursuant to Rule 87(3)(d) and E96/7, para. 22. No audio recording appears to be available. If admitted, since this statement was not taken under judicial supervision, it should be considered to have the same status as a statement taken by an entity external to the ECCC, which enjoys no presumption of reliability (E96/7, para. 29). Since Mr. IENG Sary was afforded no opportunity to confront this witness, the Trial Chamber should give little or no weight to this statement, should it find that the statement is admissible pursuant to the criteria set out in Rule 87(3).</p> <p>Finally, this statement is not available in Khmer or French. Unless it is made available in Khmer and French by 4 March 2013, it cannot be considered to have been put before the Chamber (pursuant to E185/1, para. 16, E246/1).</p>
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