

From Uganda to The Hague and Back

The ICC's *Ongwen* Case

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1. INTRODUCTION

On a cold February morning in 2021 in Trial Chamber IX in the Hague, Dominic Ongwen rose to hear the judgment for his crimes committed far away in the savanna grassland of northern Uganda almost 20 years ago, when he was a brigade commander of the Lord's Resistance Army (LRA) rebel group. The orderly proceedings of the Hague courtroom stood in stark contrast to the four attacks, crimes against child soldiers and gender-based crimes of which the Chamber found him guilty: attacks in which his soldiers surrounded camps sheltering civilians displaced by the war and indiscriminately shot them, burning more inside their tents and grass huts. Such LRA violence did not start with these crimes, nor did it stop after them. Ongwen had felt the effects of such violence himself, being taken on his way home from school and forced to commit atrocities as a child against other abductees. The judgment delivered that cold February morning and its confirmation on appeal the following winter brought to an end years of trial proceedings, but did it represent justice more broadly?

To what extent did this case before the International Criminal Court (ICC) provide justice for the tens of thousands of people whose lives were torn apart by the conflict in Uganda? To what extent can international criminal proceedings, which necessarily individualize criminal responsibility and address only a fraction of crimes committed in a given conflict, ever deliver meaningful justice to victims and survivors? Will the promise of \$750 in reparations to each of the nearly 50,000 victims be able to remedy any of the harm they have suffered, or create tensions with the other two million victims affected by the conflict? Clearly, the *Ongwen* trial raises fundamental questions about the aspirations and limitations of international criminal justice — a deeper introspection that goes beyond the immediate question facing the court in this trial: the defendant's liability for the charged crimes within the terms of the Rome Statute?

As many readers will know, the defendant in this case, Dominic Ongwen, is a former LRA commander who was abducted and forcibly recruited as a child by the group before rising

through its ranks. In 2021, he was convicted of 61 out of 70 war crimes and crimes against humanity charges committed in Uganda between 2002 and 2005, with the conviction upheld on appeal.¹ His case is compelling for many reasons. It included the widest range of charges of any ICC trial to date and spanned virtually the whole of the Court's history, tracking across all three Prosecutors' terms.² Throughout the proceedings, the defendant's own experience of violence within the LRA raised weighty legal and moral questions about his responsibility for crimes he committed in adulthood as a brigade commander: questions that were widely discussed by scholars, civil society and affected communities, as well as within the courtroom itself. The moral paradox of the case is most apparent in Mr Ongwen being charged and convicted of war crimes of which he was also a victim: the conscription, enlistment, and use of children as active participants in hostilities. It was also a precedent-setting case, legally speaking. Mr Ongwen was the first ICC defendant to raise the defences of duress and mental defect: defences which, if accepted, would have resulted in a full acquittal.³ He was also the first person in any international criminal tribunal to be charged with forced pregnancy,⁴ and the first ICC defendant to be charged with forced marriage, following jurisprudence from the Special Court for Sierra Leone and Extraordinary Chambers in the Courts of Cambodia on that crime.⁵

When we initiated this special issue in early 2023, *Ongwen* was also the sole case from the ICC's Uganda situation to proceed past the arrest warrant stage. There was (and is) no public record of any ICC case concerning crimes committed by other parties to the conflict, including especially the Ugandan armed forces.⁶ As for the other LRA cases, they have been either terminated due to the suspects' death or, in the case of LRA leader Joseph Kony, stalled for almost two decades while the arrest warrant remained unexecuted. However, over the course of the special issue's creation, Prosecutor Khan applied for confirmation of charges against Kony *in absentia* — another 'first' for the ICC — and following observations of the defence, prosecution, and the office of the public counsel for victims, and jurisprudence from the Trial and Appeals Chambers of the ICC, the confirmation of charges hearing is currently scheduled to start on 9 September 2025.⁷ The proposed charges in *Kony* build upon the jurisprudence set down in *Ongwen*, as seen, for example, in the charges for forced pregnancy and forced marriage, showing that the *Ongwen* case is already having ripple effects within the Court.⁸

¹ Trial Judgment, *Ongwen* (ICC-02/04-01/15-1762-Red), Trial Chamber IX, 4 February 2021; Judgment on the appeal of Mr Ongwen against the decision of Trial Chamber IX of 4 February 2021 entitled 'Trial Judgment', *Ongwen* (ICC-02/04-01/15-2022-Red), Appeals Chamber, 15 December 2022.

² The proceedings began in 2005 when Prosecutor Moreno Ocampo applied for arrest warrants concerning alleged LRA leader Joseph Kony and four other LRA members, including Mr Ongwen. It was then severed from the *Kony et al.* case in 2015 following Mr Ongwen's voluntary appearance at the ICC, with the charges confirmed in 2016, during Prosecutor Bensouda's term. The judgment was delivered in 2021, with the conviction and sentence upheld on appeal in 2022, during Prosecutor Khan's term.

³ Art. 31(1)(a) and (d) ICCSt.

⁴ R. Grey, 'The ICC's First "Forced Pregnancy" Case in Historical Perspective', 15 *Journal of International Criminal Justice* (2017) 905–930.

⁵ K.M. Maloney, M. O'Brien and V. Oosterveld, 'Forced Marriage as the Crime Against Humanity of "Other Inhumane Acts" in the International Criminal Court's Ongwen Case', 23 *International Criminal Law Review* (2023) 705–730.

⁶ See Human Rights Watch, *Unfinished Business Closing Gaps in the Selection of ICC Cases* (2011), available online at <https://www.hrw.org/report/2011/09/15/unfinished-business/closing-gaps-selection-icc-cases> (visited 3 October 2024); S. Nouwen and W. Werner, 'Doing Justice to the Political: The International Criminal Court in Uganda and Sudan', 21 *European Journal of International Law* (2010) 941–965.

⁷ Decision Postponing the Confirmation of Charges Hearing, *Kony* (ICC-02/04-01/05-526), Pre-Trial Chamber III, 12 September 2024. Judgment on the appeal of Mr Joseph Kony against the decision of Pre-Trial Chamber III of 29 October 2024 entitled 'Decision on the criteria for holding confirmation of charges proceedings in absentia', *Kony* (ICC-02/04-01/05 OA4), Appeals Chamber, 3 June 2025.

⁸ Document Containing the Charges, *Kony* (ICC-02/04-01/05-474), Pre-Trial Chamber II, 19 January 2024.

The *Ongwen* case also has its own afterlife in Uganda. The ICC Prosecutor's initiation of an investigation into the Uganda situation in 2004, following President Museveni's 2003 referral of the 'situation concerning the LRA' to the ICC, had a mixed impact on Uganda.⁹ Some suggest that the unsealing of the arrest warrants in 2005 pushed the LRA to seek peace and avoid prosecution, in turn prompting the Sudanese government to stop arming them.¹⁰ Since 2006, the LRA has been kept outside Uganda, allowing some displaced civilians to return to their homes and rebuild their lives. The resulting peace process and ceasefire vastly improved the security situation in northern Uganda, but the outstanding arrest warrants also caused the LRA to continue its violence against civilians in the Democratic Republic of the Congo, the Central African Republic and Sudan.¹¹ The imposition of external justice efforts through the ICC was also seen by some as contrary to local justice practices and the 2000 Amnesty Act, which was intended to allow those abducted by the LRA to return home and be rehabilitated without the fear of prosecution.¹²

In legal terms, the Ugandan government passed its domesticating act of the Rome Statute in 2010, as well as creating the International Crimes Division (ICD) in the Ugandan high court in 2008,¹³ which saw another LRA commander, Thomas Kwoyelo, convicted of 44 war crimes in August 2024. While on the face of these developments the intervention of the ICC has a positive complementarity impact on Uganda, below the surface efforts to incorporate accountability within the peace agreement and the stalling of the implementation of the 2019 transitional justice measures have all underscored the merely performative nature of domestic justice for crimes committed by both the LRA and Uganda army during the conflict.¹⁴ As the adage says, 'when two elephants fight, it is the grass who suffers' — while the intervention of the ICC did contribute to the LRA being dislodged from Uganda, justice for the Ugandan government's crimes remains unaccounted for, and civilians continue to bear the burden of the war's consequences.

These and other notable aspects of the *Ongwen* case are discussed in this special issue of the *Journal*. In selecting submissions to include, we strove for diversity in terms of authors' gender, geography and career stage, with a particular interest in including Ugandan perspectives. To that end, we issued an open call for papers as well as sending targeted invitations and offered editorial guidance on submissions alongside the *Journal's* standing practice of double-blind peer review. Diversity of views was also important, as demonstrated in our inclusion of a range of scholarly opinions, as well as reflections from representatives of the defence, prosecution, and victims in the case. We remained open to perspectives in tension with each other (and sometimes, in tension with our own), provided that the authors

⁹ ICC, 'ICC — President of Uganda refers situation concerning the Lord's Resistance Army (LRA) to the ICC', 29 January 2004, available online at [https://www.icc-cpi.int/news/icc-president-uganda-refers-situation-concerning-lords-resistance-army-lra-icc#:~:text=Press%20Release,President%20of%20Uganda%20refers%20situation%20concerning%20the,Army%20\(LRA\)%20to%20the%20ICC&text=In%20December%202003%20the%20President,of%20the%20International%20Criminal%20Court](https://www.icc-cpi.int/news/icc-president-uganda-refers-situation-concerning-lords-resistance-army-lra-icc#:~:text=Press%20Release,President%20of%20Uganda%20refers%20situation%20concerning%20the,Army%20(LRA)%20to%20the%20ICC&text=In%20December%202003%20the%20President,of%20the%20International%20Criminal%20Court) (visited 3 October 2024); ICC, 'Prosecutor of the International Criminal Court opens an investigation into Northern Uganda', 29 July 2004, available online at <https://www.icc-cpi.int/news/icc-prosecutor-international-criminal-court-opens-investigation-northern-uganda> (visited 3 October 2024).

¹⁰ N. Grono and A. O'Brien, 'Justice in Conflict? The ICC and Peace Processes', in N. Waddell and P. Clark (eds), *Courting Conflict? Justice, Peace and the ICC in Africa* (Royal African Society 2008) 13–20, at 15; see also M. Wierda and M. Otim, 'Justice at Juba: International Obligations and Local Demand in Northern Uganda', in Waddell and Clark *ibid.*, 21–28, at 22.

¹¹ M. Schomerus, *The Lord's Resistance Army: Violence and Peacemaking in Africa* (Cambridge University Press, 2021), at 262–263.

¹² M. Ssenyonjo, 'Accountability of Non-State Actors in Uganda for War Crimes and Human Rights Violations: Between Amnesty and the International Criminal Court', 10 *Journal of Conflict and Security Law* (2005) 405–434.

¹³ See J. Ndagire, 'A Critical Assessment of the International Crimes Division of the High Court of Uganda', in E. Lubaale and N. Dyani-Mhango (eds), *National Accountability for International Crimes in Africa* (Palgrave, 2022) 395–426.

¹⁴ See A. MacDonald, 'In the interests of justice?' The International Criminal Court, peace talks and the failed quest for war crimes accountability in northern Uganda', 11 *Journal of Eastern African Studies* (2017) 628–648.

delineated between fact and opinion, and adequately substantiated their claims. The result is a rich and hopefully thought-provoking collection of contrasting viewpoints. Below, we map out some of the key themes to give readers a sense of the shape of the symposium as a whole.

2. ONGWEN IN THE UGANDAN CONTEXT

In our call for papers, we were keen to include Ugandan perspectives on the *Ongwen* case and were pleased to receive a number of excellent contributions from some of the key practitioners and commentators who have closely worked with LRA victims and followed the *Ongwen* case. These contributions are intended to widen the discussion on the impact of the *Ongwen* case, and as such, their format is more suggestive of concise reflection pieces.

In the first piece, Dennis Jjuuko and Francis Opio reflect on the Court's outreach in northern Uganda. They highlight that any communication strategy needs to be contextualized to the local communication infrastructure and the needs of the victim population. These insights reflect some of the frustrations of affected communities in northern Uganda and often one directional ICC communication with them, which provide important lessons for other contexts and improving the Court's outreach.

Tonny Kirabira's brief reflection goes beyond the *Ongwen* case to take a wider view of transitional justice mechanisms in the whole region to note that justice still remains elusive for thousands of other victims of the LRA. It looks first at institutional reform within criminal justice mechanisms in Uganda, focusing specifically on the domestic judicial framework on war crimes. Secondly, it discusses the socio-economic elements of transitional justice, in particular the housing, land, and property-related rights of internally displaced communities as well as of children born of war and the peculiar challenges they face in post-war settings. Based on the temporal realities of post-war Uganda, Kirabira considers it important to back the development and reform of institutions that support transgenerational rights of communities affected by the conflict. In this connection, the ICC's decision to hold the *in absentia* proceedings against Kony is seen as a welcome development, providing some fresh impetus for thinking about transitional justice.

Brian Kalenge and Zoe Mauki also attempt to determine the existing gaps within the domestic legal and institutional framework to ensure effective administration of justice for atrocity crimes. They critically examine the work of the International Crimes Division within the High Court of Uganda, which, 12 years since its foundation, has successfully completed merely a single case: that of Thomas Kwoyelo. While acknowledging the complex legal, political, and cultural constraints the ICD faces in bringing about efficient domestic prosecution of international crimes within Uganda, it is the authors' view Uganda has not complemented the ICC's work, and that within official quarters there seems to be no political will or commitment towards really seeking justice for victims of atrocity crimes. Is it time, then, they ask, for the ICC to open further investigations into crimes covered by the ICD? And will the *Kony* case serve part of this purpose?

In the final piece in this section, Sarah Kasande, Head of Office of the International Centre for Transitional Justice and an Advocate in the Courts of Judicature in Uganda, offers some reflections on the broader justice landscape in Uganda. She highlights the lack of accountability for Ugandan government forces, who engaged in brutal counter-insurgency tactics against the LRA that caused the deaths of thousands of civilians. She also discusses the yet unimplemented transitional justice policy that aimed to take a more comprehensive approach to justice in Uganda, and which acknowledges at least the Ugandan government's obligation to deal with the past and the consequences of the war in northern Uganda.

3. ONGWEN'S PERSONAL CIRCUMSTANCES

In *Ongwen*, the Defence argued that the defendant was affected by duress and mental incapacitation during the period relevant to the charges, as a result of his abduction by the LRA as a boy, his exposure to violence within that group, and his domination by Kony. Our aim in this special issue was not to relitigate these claims, which were rejected at trial and on appeal after the evidence was carefully considered, but to open up critical analysis of these defences in the particular context of the *Ongwen* case.

A reflection by Mr Ongwen's defence counsel, Charles Taku and Beth Lyons, offers readers an in-depth view of the Defence's arguments on duress and mental defect.¹⁵ Provocatively titled 'A Stain on International Criminal Justice', the authors critique what they describe as the 'white' and 'Western' gaze of the ICC. Drawing on critical race theory,¹⁶ they argue that 'legal racism' at the institutional level (as opposed to individual racism on the Bench) coloured the Court's assessment of duress and mental defect in this case. In their contention Ongwen became a 'scapegoat' for Kony and the other senior LRA leaders who remained beyond the reach of the ICC.

On duress, Paul Behrens argues that the ICC should adopt an 'objective individualized approach' when assessing the first limb of the 'duress' test, that is whether the defendant acted in response to a threat of imminent death or of continuing or imminent serious bodily harm. This approach considers the viewpoint of Ongwen's social circle, thereby acknowledging the influence of cultural and social factors on the defendant's perception of threat, while maintaining a degree of objectivity. Behrens argues that this approach provides a more balanced assessment in cases such as Ongwen's, where a defendant's perception of threat is said to be influenced by spiritual beliefs.

Beatrice Parentella's article highlights the place of culture in international criminal justice. She focused on the place of cultural defences and how the *Ongwen* case offered a first and unique opportunity to address these. She argues that the trial and appeals judgment in the *Ongwen* case goes beyond the traditional binary debate of universality of international justice and cultural relativism in incorporating local perspectives to reflect a nuanced approach to cultural defences that opens the door to future development of their place in international criminal law.

Vasiliki Zoe Festa's article critiques the portrayal of victimhood and perpetratorship in the *Ongwen* case. Applying an 'expressivist' analysis — which focuses on the values and messages conveyed by a court's decisions — she contends that the *Ongwen* trial judgment and sentence prioritize Mr Ongwen's perpetratorship, including by silencing his own testimony of his victimhood in the LRA, while erasing or obscuring his identity as a victim.

4. VICTIM PARTICIPATION AND REPARATION

The special issue includes a reflection on this topic by Paolina Massidda and Joseph Akwenyu, two of the victims' legal representatives in the *Ongwen* case, co-authored with Luke Moffett. Based on interviews and interactions with their clients, they argue that participating victims in the *Ongwen* case felt heard and well-represented by their lawyers, who, in one participant's words, 'stood for what we wanted from the Court'. Some even credited

¹⁵ C.A. Taku and B.S. Lyon, 'The *Ongwen* Judgments: A Strain on International Justice', <https://academic.oup.com/jicj/advance-article-abstract/doi/10.1093/jicj/mqae044/7876435>.

¹⁶ E.g. K.M. Clarke, 'Negotiating Racial Injustice: How International Criminal Law Helps Entrench Structural Inequality', *JustSecurity*, 24 July 2020, available online at [Negotiating Racial Injustice: How International Criminal Law Helps Entrench Structural Inequality](https://www.justsecurity.org/60442/negotiating-racial-injustice-how-international-criminal-law-helps-entrench-structural-inequality/) (justsecurity.org) (visited 18 August 2024) (power and role of white supremacy re Rome Statute); On how racism manifest in US laws, statutes, and jurisprudence, see D.A. Bell, Jr., *Race, Racism and American Law* (2nd edn., Little, Brown and Company, 1990).

their lawyers with being their ‘voice’ to the ICC, for providing emotional support, and connecting them with medical assistance.

Jackline Atingo, Tim Allen, and Anna McDonald’s piece offers a more complex portrayal of victim and witness experiences. Combining interviews and ethnography, and enriched by Atingo’s perspective as a survivor of LRA crimes, they highlight the complexities of victimhood in the *Ongwen* case. Their focus is on the diverse reactions of the ‘wives’ of Ongwen who testified in the case: reactions that range from relief at his conviction to concerns about his ability to provide while in prison for the welfare of children that he fathered in the context of forced marriage and forced impregnation, and a perception that it was ‘unfortunate’ that Ongwen was prosecuted when Kony was not. The article offers a rare viewpoint into the trial from the perspective of those who took the stand: their experiences of testifying and being cross-examined, of watching the verdict in Uganda, and their responses to the ICC’s particular form of justice.

Victims are also central to Kirsten Fisher’s piece, although here, the cohort concerned did *not* achieve formal victim status in the ICC. Indeed, her article foregrounds the disappointment felt by victims/survivors of the LRA’s 2004 attack on the Barlonyo internally displaced persons camp — an attack which was *not* prosecuted in the *Ongwen* case. The omission of this massacre from the charges caused significant distress and disillusionment among the survivors, who believed they had compelling evidence of Mr Ongwen’s leadership in this attack. In particular, the Barlonyo survivors felt let down about their lack of access to ICC reparations, as a result of the exclusion of the Barlonyo attack from the charges in his case. In this way, Fisher’s piece recalls past scholarship on the unintended hierarchy of victimization resulting from the ICC Prosecutor’s selection of charges, and its implications for access to reparation.¹⁷

5. GENDER CRIMES

As touched on above, the *Ongwen* case was particularly effective in its recognition of sexual, gender-based, and reproductive crimes. Although the Office of the Prosecutor (OTP) did not list any such crimes on Mr Ongwen’s arrest warrant application in 2005, he was later charged with and convicted of a wide range of these crimes, including sexual, gender-based, and reproductive crimes that he committed personally against women and girls assigned to him as ‘wives’, as well as similar crimes committed against women and girls by LRA soldiers in his brigade. This expansion in the charges was enabled by further investigations following Ongwen’s surrender to the ICC in 2015 and by the OTP’s increased capability and policy framework for prosecuting these crimes.¹⁸

According to OTP Trial Attorney Pubudu Sachithanandan, writing in his personal capacity, the addition of charges for sexual, gender-based, and reproductive crimes was also one of the several advances enabled by positive team dynamics that allowed the prosecution to successfully navigate the volatility, uncertainty, complexity, and ambiguity of the case.

¹⁷ E.g. L. Chappell, ‘The Gender Injustice Cascade: “Transformative” Reparations for Victims of Sexual and Gender-based Crimes in the Lubanga Case at the International Criminal Court’, 21 *International Journal of Human Rights* (2017) 1223–1242; L. Moffett and C. Sandoval, ‘Tilting at Windmills: Reparations and the International Criminal Court’, 34 *Leiden Journal of International Law* (2021) 749–769; and S. Gilmore, ‘Better Late than Never: Reparations for Sexual Violence in the Ntaganda case before the International Criminal Court’, 2 *Journal of Human Trafficking, Enslavement and Conflict-Related Sexual Violence* (2021) 27–47.

¹⁸ ICC Office of the Prosecutor, *Policy Paper on Sexual and Gender-Based Crimes* (2014), available online at https://www.icc-cpi.int/sites/default/files/iccdocs/otp/Policy_Paper_on_Sexual_and_Gender-Based_Crimes-20_June_2014-ENG.pdf (visited 20 June 2025). More recently, see ICC Office of the Prosecutor, *Policy on Gender-Based Crimes* (2023), available online at <https://www.icc-cpi.int/sites/default/files/2023-12/2023-policy-gender-en-web.pdf> (visited 20 June 2025).

A significant legal departure was considered to have been made when judges in the *Ongwen* case first categorized the phenomenon of bush wives as forced marriage under the residual category of 'other inhumane act' (OIA). Ligeia Quackelbeen takes a nuanced but critical view of the setting of this legal precedent. Based on a systematic examination of the transcripts of the *Ongwen* case, and in particular on the questioning of the 'wives' of Dominic Ongwen in pre-trial proceedings, the article seeks to understand how a set of properties led the judges to characterize the bush wives phenomenon as the OIA of forced marriage. Drawing from philosophy of language and cognitive science, she evaluates the 'Aristotelian Approach' — a generic way of labelling fact-patterns — that had been used to characterize the bush wives phenomenon in *Ongwen* and reaches the conclusion that a 'Prototype Approach' allowing judges to more freely interpret the OIA category in light of local practices may in fact provide for a sensitive reading of forced marriage in factual terms.

In the next article, Judy Mionki explores a theme raised by Tonny Kirabira. She examines specific cases, including of *Ongwen*, of children born of conflict-related sexual violence (CRSV) to understand the precise nature of their harm, making them a unique category of victims under international criminal law. For a long time, children born of CRSV were seen as secondary victims. Mionki instead seeks to identify the nature, intent and impact of their victimhood by surfacing direct crimes under ICC's jurisdiction, and positions them firmly within investigative, prosecutorial, and judicial attention as direct victims before the ICC.

6. AGE

Issues relating to age arose in numerous pieces, which was an unexpected yet compelling theme to explore. In their reflection, Taku and Lyons' critique Article 26 of the Rome Statute, which gives the ICC power to prosecute defendants provided they were 18 or more at the time of the alleged crimes. In their view, this approach is an artificial way to measure a person's moral development and fails to recognize the ongoing implications of childhood trauma into adulthood.

Fifteen was another critical age in the *Ongwen* case, because the charges included the war crimes of conscripting or enlisting children under the age of 15 years, or using them to participate actively in hostilities. When adjudicating these war crimes, the Court must assess the age of the relevant children — a question that is difficult where birth records are unavailable or unreliable, and which raises philosophical questions about whether age should be assessed in chronological, biological, or social terms. Rodrigo Bastias Crudo and Marcelo Molina Villalobos grapple with such questions in their article. They argue that while the ICC's approach to determining the age of child soldiers in the *Ongwen* case was somewhat innovative, there remain challenges in terms of the validity, reliability, and potential bias of age determination methods.

7. FINAL REMARKS

From the range of articles in the special issue, it is clear to see diverse perspectives and at times contrary positions on the *Ongwen* case. The many submissions we received — those that we could include and those we could not — demonstrated an interest in exploring the novel or complex aspect of the ICC's legal case against Mr Ongwen, as well as broader questions about the strengths and pitfalls of international criminal justice that this case provoked. The *Ongwen* case, like many before the ICC, has had its procedural, substantial, and contextual controversies. The legacy of the case and of ICC intervention in the midst of ongoing armed conflict and peacebuilding efforts demonstrate that the Court has firmly established

that impunity for international crimes is no longer absolute, though justice for victims remains debatable. While Joseph Kony remains at large and the LRA is continuing to commit violence across the Great Lakes Region, there has been *some* accounting of their crimes. More fundamentally, justice has dropped slowly: the pursuit of accountability has persisted for international crimes in Uganda, some two decades later from the initial referral. While not complete justice, nor balanced for the atrocities committed by the government's forces, a substantive number of victims of the LRA are now eligible and will hopefully soon receive their entitled redress.

We are pleased to present this special issue on the ICC's *Ongwen* case, undoubtedly one of the most complex cases in the ICC so far, in accordance with the *Journal's* continuing mission to dig deeply, but also investigate from as many different angles as possible, problems of concern to the international criminal law community. The gestation period for the issue has been long: and for this delay, we apologize. We are grateful to all who contributed to this collection, our authors, and our fellow editors, and, in particular, the peer reviewers for their careful and constructive feedback to each submission.