## BEFORE THE CONTEMPT JUDGE SPECIAL TRIBUNAL FOR LEBANON

Case No: STL-14-05/PT/CJ

Before: Judge Nicola Lettieri, Contempt Judge

Registrar: Mr Daryl Mundis

Date: 13 March 2015

Filing Party: Amicus Curiae Prosecutor

Original language: English

Classification: Public

# IN THE CASE AGAINST AL JADEED [CO.] S.A.L. / NEW T.V. S.A.L. (N.T.V.) KARMA MOHAMED TAHSIN AL KHAYAT

#### TABLE OF AGREED FACTS

Amicus Curiae Prosecutor:

Mr Kenneth Scott

Counsel for Al Jadeed S.A.L and

Ms Karma Khayat:

Mr Karim A.A. Khan Q.C. Mr Rodney Dixon Q.C.

Ms Dato' Shyamala Alagendra

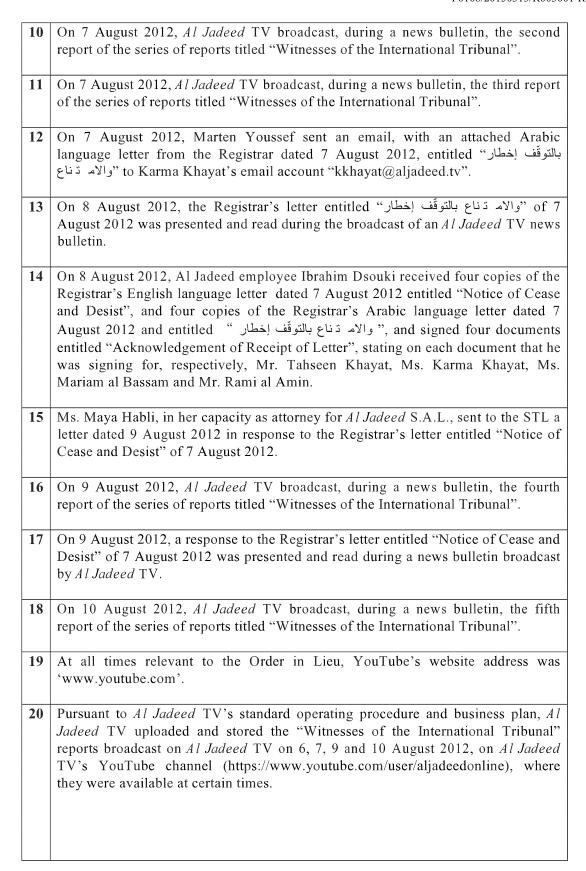


The Amicus Curiae Prosecutor ("Amicus") respectfully submits this Table of Agreed Facts. The parties agree as follows:

### TABLE OF AGREED FACTS

The parties make no agreement or admission about the circumstances in which the following facts occurred, nor about the inferences (if any) that may be drawn from them, individually or collectively. *Amicus* is not limited by the following facts and he may prove other facts or introduce other evidence related to these facts and their circumstances.

	Agreed Facts
1	At all times relevant to the Order in Lieu of an Indictment of 31 January 2014 ("Order in Lieu"), Al Jadeed S.A.L., registered before the Beirut Commercial Court on 13 December 1990, registration number 57693 (Beirut(B)/public/1990/57693), was licensed to own, manage and operate Al Jadeed TV, a television/establishment of category A as per provision of Lebanese law no. 382 dated 4/11/1994 (together and hereafter "Al Jadeed TV").
2	At all times relevant to the Order in Lieu, <i>Al Jadeed</i> TV was a television or media business broadcasting general interest programmes, including news bulletins.
3	Ms. Karma Mohamed Tahsin al Khayat was born in 1983, in Saida, Lebanon (hereinafter "Karma Khayat").
4	At all times relevant to the Order in Lieu, Karma Khayat was a shareholder of Al Jadeed S.A.L.
5	At all times relevant to the Order in Lieu, through at least the end of 2013, Karma Khayat was Deputy Head of News and Political Programs at Al Jadeed TV.
6	At all times relevant to the Order in Lieu, Ms. Mariam al Bassam was Head of News and Political Programs at Al Jadeed TV.
7	Rami al Amin is the Al Jadeed reporter credited for the 6, 7, 9 and 10 August 2012 series of reports titled "Witnesses of the International Tribunal" broadcast on Al Jadeed TV.
8	On 5 August 2012, <i>Al Jadeed</i> TV announced that it would broadcast a series of reports titled "Witnesses of the International Tribunal", to be broadcast starting the next day.
9	On 6 August 2012, <i>Al Jadeed</i> TV broadcast, during a news bulletin, the first report of the series of reports titled "Witnesses of the International Tribunal".



- Pursuant to Al Jadeed TV's standard operating procedure and business plan, Al Jadeed TV made available on its website (www.aljadeed.tv) at certain times the "Witnesses of the International Tribunal" reports broadcast on Al Jadeed TV on 6, 7, 9 and 10 August 2012 by embedding the videos from Al Jadeed TV's YouTube channel.
- Pursuant to Al Jadeed TV's standard operating procedure and business plan, the Facebook page on which Al Jadeed TV posted, up to a certain time, the links to the "Witnesses of the International Tribunal" reports broadcast on 6, 7, 9 and 10 August 2012 on Al Jadeed TV was AljadeedOnline (https://www.facebook.com/aljadeedonline).

#### RESPECTFULLY SUBMITTED THIS 13 MARCH 2015.

(Connected Switt

Mr Kenneth Scott

Amicus Curiae

**AGREED BY THE DEFENCE:** 

Mr Karim A.A. Khan Q.C.

Counsel for *Al Jadeed* S.A.L and Ms Karma Khayat:

